



CODE OF ETHICS AND COMPANY LIABILITY

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1 | Introduction

The Intercable Group (Intercable Srl, Intercable Tools Srl, Intercable Immo Srl and their affiliated companies) is a modern, international and diversified group of companies. Our recipe for success lies in the identification of market gaps in the technology sector and development with a high level of quality and innovation potential.

Our activity is characterized by innovation, speed, quality and cost consciousness.

In order to deliver quality to the customers, it is not enough to have powerful computers and modern machines and to control the production via optimized processes! It also includes commitment and passion. We encourage and challenge our employees with regard to their quality and environmental awareness. The zero-error goal is our top priority!

People as a factor of success: the interpersonal relationship inside and outside is our success factor and the basis of our actions.

(Co)workers = (Co)entrepreneurs = (Co) designers: the future social security of a globally operating company in a high-wage country depends on the value added per employee. State of the technology or degree of automation (right products and mature processes) as well as the qualification, efficiency and productivity of all participants (training, motivation and commitment) are crucial here. We create the conditions for a pleasant working environment and commit to compliance with legal and regulatory requirements to protect employees from injuries and occupational diseases.

Customer proximity and innovation in everything we do. Proximity and fairness to the customer is very important to us; this creates strong and long-term partnerships. These synergies promote individual solutions and create a continuous improvement of the integrated management system. Our competence and customer

proximity, as well as flexibility and adherence to deadlines are our top priority.

Innovation and the latest technologies are the key to success. Customer requirements and market requirements play an increasingly important role in this context. In cooperation with external partners and institutes or universities, we ensure ongoing product and process developments. In this regard, we always strive to provide the necessary resources and investments while respecting the sustainability of our actions.

Result and cost awareness, the recognition and development of synergies within the group or with external partners and the continuous improvement of the integrated management system are crucial prerequisites for the sustainable business development of our Group and as such they are lived by all employees.

We contribute to sustainability by balancing environmental protection and economic requirements, and by complying with legal and regulatory requirements.

Down-to-earthness, implementation and performance orientation, reliability, quality of life and nature, honest family and social ties, linguistic and cultural openness are an important legacy of our South Tyrolean tradition and unique selling points for our future international development.

The Code of Ethics reflects the Company's fundamental values and includes codes of conduct for the prevention of crime and, more generally, acts contrary to the core values of the Intercable Group.

The Code of Ethics complements applicable legal and statutory standards as well as internal policies and regulations issued separately in some important areas.

2 | Scope of Application

This Code of Ethics is applicable to Intercable Group and is mandatory for its employees, irrespective of the type of employment relationship, classification and integration.

The Code of Ethics is also mandatory for any natural or legal person who enters into contact or into a business relationship with the Company, regardless of the nature of the relationship and the underlying title.

The management level also has to take into account the values set out in the Code of Ethics when implementing the decisions taken by an administrative body, both internally with its employees and externally with regard to third parties who come into contact with the company.

All persons and entities mentioned above are referred to below as „beneficiaries“.

3 | Ethical Values

The ethical values of the company it is committed to, and which are designed to promote and strengthen good business practices, as well as to protect the company's trustworthiness and reputation, are set out below.

3.1 COMPLIANCE WITH APPLICABLE NORMATIVE REGULATIONS

In the course of the activities and within the existing business relationships, all applicable valid statutory provisions, the Code of Ethics, the defined internal processes and procedures as well as the issued instructions and other regulations must be observed and followed.

In any case, compliance with the statutory provisions takes precedence over conflicting instructions from a supervisor.

In no case does the promoting the interests of the company justify actions that are contrary to the principles of honesty and legality. For this reason, it is made abundantly clear that the violation of normative provisions is in no way in the interest of the company or constitutes an appropriate means of gaining an advantage or pursuing one's own interests.

3.2 PROHIBITION OF DISCRIMINATION AND RESPECT FOR HUMAN RIGHTS

In accordance with the applicable law, the Company avoids any form of discrimination, whether by gender, race, origin, language, religion, political affiliation, affiliation with political parties or trade unions, health, age, etc.

Any form of violence or harassment, in particular mobbing and sexual harassment, is also prohibited. Respect for human rights is of fundamental importance to company.

Aware of the legal provisions, in particular criminal provisions, the company is opposed to all forms of child labor, human trafficking and slavery.

3.3 HONESTY AND AVOIDANCE OF CONFLICTS OF INTEREST

Subject to applicable law, beneficiaries shall act with the utmost honesty and avoid situations in which they may potentially be in a conflict of interest with the Company.

3.4 CONFIDENTIALITY OF INFORMATION

The Company guarantees the confidentiality and protection of the information in its possession and refrains from processing any confidential data, except in the case of a clear and express consent of the interested party, in accordance with the applicable data protection legislation.

All beneficiaries are required to refrain from using, processing and disseminating confidential information and data that they learn about in the course of their activities outside the respective field of work.

3.5 RELATIONS WITH THE CONTROL BODIES

Relations with the control and supervisory bodies (for example, the supervisory board) are based on the principles of transparency, completeness and accuracy. In any case, it is prohibited to conceal or withhold information which, according to the applicable legal provisions, is to be communicated to the controlling bodies or which is necessary and useful for the better performance of their respective duties.

3.6 EMPLOYEES

The company's employees, as mentioned above, are a fundamental building block of success. For this reason and under labor law, the company protects and promotes the physical and mental integrity of its employees in order to promote and enhance their satisfaction and competencies.

The company guarantees reasonable, safe and healthy working conditions in compliance with the provisions of labour law, collective agreements and social security law.

The company complies with legislation and collective bargaining on fair pay. The pay foreseen is expressly indicated in the employment contract. The payslips, which are distributed monthly to the workers, clearly show the details of the hours paid, as well as all the other responsibilities.

The company respects the working hours provided for by the laws in force and by the national and company contractual regulations, observing the scheduled rest periods and the maximum number of weekly, monthly and annual working hours. All workers are guaranteed the possibility of taking holidays and leave as provided for by the collective agreement, in line with the company's business plan.

The company does not accept any form of forced labour or the employment of illegal workers. Immigrant workers shall have the same rights as local workers.

The company shall not tolerate any form of harassment or discrimination in internal and external working relationships, such as creating a hostile working environment for individual employees or groups of employees, unjustified interference in the execution of the work of others or creating obstacles to the career prospects of others.

The company does not tolerate any form of sexual harassment, meaning the subordination of opportunities for professional growth or other advantage to the provision of sexual favours and any other behaviour of a sexual nature.

In this regard, no claims or threats shall be acceptable that are intended to result in employees violating the law or the Code of Ethics or engaging in actions that conflict with the beliefs of individuals.

3.7 CHILD LABOR

The company shall not tolerate any form of child labour. The company shall take all necessary measures to ensure that no workers below the age limit set by law and/or national collective agreements are employed. Any legal restrictions on the employment of persons under the age of 18 shall be respected. The company, in accordance with the United Nations Convention on the Rights of the Child, considers any person under the age of 18 to be a child. We recognise the rights of every child to be protected from economic exploitation and from any work that is dangerous or may interfere with their education, or that is harmful to their health or mental, physical, moral and social development.

3.8 RIGHT OF ASSOCIATION

Every worker has the right to form or join peaceful associations (e.g. trade unions) of his or her own choosing and in accordance with the law. Workers shall not be subject to disciplinary or discriminatory action by the company in respect of their rights of association.

3.9 TRANSPARENCY AND COMPLETENESS OF THE INFORMATION

Employees are required, in the awareness of the interests involved, to provide complete, transparent, understandable and accurate information in order to enable the respective beneficiary to make conscious decisions. This is done by showing possible alternatives and the possible, foreseeable consequences.

3.10 QUALITY OF THE SERVICES OFFERED

The company's activity is focused on customer satisfaction, protection and appreciation of the environment. For this reason, the activities and services offered are based on the highest quality standards, which is confirmed by various certifications.

3.11 VRESPONSIBILITY TO THE GENERAL PUBLIC

The company is aware of its position and function, in particular the impact of its activities on conditions, economic and social development and overall prosperity. Social acceptance of the general public and its further increase are of fundamental significance and importance.

3.12 PROTECTION OF THE ENVIRONMENT

The company has always considered the environment as an area of special importance and is keen to protect it. In this context, the decisions which are important for future generations are aimed at keeping a balance between achieving own goals and environmental demands.

3.13 FAIR COMPETITION AND COMPLIANCE WITH ANTITRUST LAWS

The company directs its own activity towards the observance of the principles of a free market and a free, open and fair competition. The company is committed to upholding transparency, honesty and integrity in business conduct.

3.14 EXPORT/IMPORT REGULATIONS, ECONOMIC SANCTIONS

The company complies with regulatory provisions relating to the import and export of goods, services, technology and information, including re-exports and parallel trade.

Particular attention is paid to the applicable sanctions rules concerning direct or indirect (through third countries) importation from or into (including payments in both directions) sanctioned territories.

This should be achieved through correct customs classification and declaration of the goods.

4 | Code of Conduct

4.1 COMPLIANCE WITH THE LAW

The company considers compliance with valid country, regional, state laws as well as international standards and laws to be a fundamental and indispensable prerequisite for its own actions.

In carrying out their own activities, the beneficiaries must adhere to the principles of legality, honesty, correctness and transparency with regard to the prevention of criminal offenses within the meaning of the provisions of the decree. For this reason, they must comply with the laws, the statutory provisions and internally defined procedures and principles in the course of their work.

In no case does the pursuit of interests of the company justify acts contrary to the above values. For this reason, it is made abundantly clear that the violation of normative provisions is by no means in the interest of the company or constitutes an appropriate means of gaining an advantage or pursuing one's own interests.

4.2 CONFLICTS OF INTEREST

A conflict of interest exists when there is a potential relationship between personal interests and the professional activity. The beneficiaries are required to avoid conflicts of interest and to resolve or end them in the event of an existing conflict of interest.

A conflict of interest exists in (but is not limited to) the following cases. The list below serves purely as an example:

- obvious or hidden interest of an employee as supplier, customer and/or competitor;
- abuse of one's own position in order to achieve interests which are in conflict with those of the company;
- use of information obtained in the course of the exercise of the subject's activity for own benefit, for the benefit of third parties or at least against the interests of the company;
- performing activities of any kind in favor of customers, suppliers, competitors and/or third parties contrary to the interests of the company.

Without prejudice to applicable, legal and contractual obligations, beneficiaries should avoid situations that could lead to a potential conflict of interest. In this context, all possible interests that exist in the context of a business of the company for its own benefit or for the benefit of third parties must be disclosed. The achievement of personal benefits in the context of the activity carried out is to be avoided and prevented.

Employees must not even give the impression that they wanted to influence third parties in an incorrect way or that their decision or action was improperly influenced.

4.3 CONFIDENTIALITY OF INFORMATION AND DATA

The company protects the confidentiality of the information and data, in particular the personal data, in the context of its activity and guarantees that the confidentiality is also guaranteed by its own employees.

In this context, each employee has to:

- collect and process only the data necessary for the performance of his/her activity;

- keep data in such a way to prevent unauthorized third parties from accessing it;
- process data only within the framework of the established procedures or with the consent of an authorized person;
- classify the information as confidential according to the applicable procedures;
- ensure that no special confidentiality obligations exist in relation to business relationships with third parties.

The Company concludes confidentiality agreements with the third parties to whom confidential information is to be disclosed.

The company has issued its own instructions and measures to ensure the protection of personal data.

Confidential internal company data is fundamental to the success and development of the company. These include both verbal and written information of a financial, operational and technical nature about the companies, their members, customers and business partners, are secret and confidential, are not known to the public and form the know-how of the company.

The dissemination and disclosure of such information and data is prohibited unless the disclosure is provided for by specific statutory or contractual agreements. The beneficiaries are required to handle the information carefully, to keep it safe and not to speak or discuss secret and confidential information in public.

4.4 ACCOUNTING

All transactions and operations performed must be based on appropriate accounting and financial reporting. The traceability of the relevant decision-making processes, approvals and the settlement of transactions and operations must be ensured.

It is necessary to follow the principles of transparency, truthfulness, correctness, accuracy and completeness.

All transactions and operations carried out must be sufficiently documented.

It is strictly prohibited, for whatever reason, to provide false or misleading information in accounting, invoicing and financial records, or to submit inaccurate information in reports for public authorities and care and prevention institutions and to conceal or withhold information.

The responsible employees must carefully store and maintain the documents and records entrusted to them, as well as to archive them properly, easily findable and according to objectively comprehensible criteria.

4.5 MONEY LAUNDERING

It is prohibited for beneficiaries to participate in activities related (or potentially related) to money laundering, i.e. to accept or use any means that may or could be derived from criminal activity in any way.

The beneficiaries must first of all check all available information, in particular financial information, about the business partners for their respectability and, if necessary, refrain from the business relationship.

4.6 INSIDER TRADING

Anyone who possesses secret or non-public information in relation to the Company or any other companies or legal entities shall not use it to his advantage or to the benefit of any third parties.

Examples of such non-public information are:

- non-published or yet unpublished annual or quarterly results;
- financial planning;
- information on significant, financial and economic development;
- information on possible upcoming mergers, joint ventures, etc.
- information about newly developed products or innovations.

These prohibitions remain valid until the publication of the aforementioned information.

4.7 TERRORISM AND TERRORIST FINANCING

In connection with the activities of its own employees and external consultants, the company prohibits:

- the support, creation, organization, management and financing (also indirect) of associations which are aimed at the establishment of international terrorist organizations or the exercise of violence against persons and property for the purpose of terrorism;
- to assist, host or provide any means of transport or communication to any person who is a member of a terrorist organization.

4.8 PROTECTION OF EMPLOYEES

The company's employees make an important and fundamental contribution to achieving the company's goals. They represent the company to the outside and thus have a significant share in its appearance and in public perception.

For this reason, the company is committed to selecting employees in the sense of equal treatment, without discrimination and based

solely on objective criteria, as well as to further develop, promote and enhance their skills and professional and social competence. The respective division and department heads must ensure the application of these principles and act as role models for their own employees through their behavior.

The company watches over to prevent any violence, coercion or behavior that violates human dignity.

4.9 SAFE WORKING ENVIRONMENT

The company guarantees its employees a healthy and safe working environment based on applicable occupational safety legislation.

Greatest attention is to be paid by beneficiaries to the prevention of accidents and related injuries for themselves and the other employees.

Employees are required to strictly comply with all occupational health and safety regulations and internally issued regulations and instructions and to promptly notify the competent authorities of any identified hazards or sources of danger so that they can take timely, appropriate action and measures to correct and/or mitigate them.

Goals are:

- prevention and control of existing risks and dangers;
- assessment of unavoidable risks;
- adapting working conditions to the needs of staff, tailored to the specific needs of each work area, to avoid or adverse health effects on individuals or minimize their consequences;
- attention to the respective technical condition;
- replacing dangerous items and equipment with non-dangerous or less dangerous ones;
- to ensure appropriate education and training of staff in this area;
- develop appropriate occupational safety and health measures taking into account technical factors, organization, working conditions and working environment;
- compliance with the existing alcohol ban

All actions shall avoid harmful effects on the environment and the public, with environmental sustainability, taking into account the rights of future generations.

4.10 PROTECTION OF CORPORATE ASSETS

The employees are responsible for the correct and careful handling of the goods entrusted to them. These are to be used for the purpose intended. Damage and theft of these goods and assets has to be avoided.

Employees have to deal responsibly with the assets provided, within the internally defined policies and regulations.

4.11 COPYRIGHT, INTELLECTUAL AND INDUSTRIAL PROPERTY

The company is aware of the importance of copyright, intellectual and industrial property and therefore respects and protects the content of any form of its own and that of others, e.g. copyright, patents, trademarks.

For this purpose, it is expressly forbidden:

- to use for any reason whatsoever, or to make available to the public, without being entitled to do so, a protected intellectual property, or part of it, for any purpose and in any form whatsoever;
- to use equipment, products or components for any reason, or provide services that have the purpose of circumventing technological measures aimed at protecting intellectual property;
- to use the business secrets of others;
- to illegally reproduce, imitate, tamper with trademarks, distinctive signs, patents, industrial designs or models of third parties;
- to make use, in an industrial and/or commercial context, of trademarks, distinctive signs, patents, industrial designs or models counterfeited by third parties.

4.12 UNAUTHORIZED APPROPRIATION OF PROPERTY OF THE COMPANY

It is forbidden to acquire the property of the company for personal use. In addition, it is forbidden to charge personal expenses and expenses to the company, unless there are separate fringe benefit agreements.

Upon termination of employment, all goods are the property of the company and the confidential and secret data, documents and information are to be returned to the company.

4.13 SOFTWARE OF THE COMPANY

The unauthorized appropriation, making copies, as well as use of software of the company or third parties is prohibited. The soft-

ware must be used within the scope of the respective license terms. The handling of the electronic systems by the employees must be done in a responsible, professional, ethical and permissible way.

In this context, the internal service instructions and guidelines must be followed strictly and the instructions of the system administrators or other specialized staff must be followed. It is prohibited to install foreign or unauthorized software on the computer or to download it from the Internet without the prior consent of the Company's authorities. The acquisition of licenses can only be done by the competent departments. The Company condemns all unlawful conduct and misuse of electronic systems, in particular the use of networks for the use and exchange of pornographic, pedophile-pornographic, racist, violent and discriminatory content.

4.14 PROTECTION OF THE ENVIRONMENT

The company is committed to environmental compliance. In addition, the company promotes the adoption of behaviors and a policy of sustainability and environmental protection among employees, members and contractors and raising awareness on social issues and environmental issues. Everyone is required to carefully separate the waste and make their contribution to the efficient use and saving of energy.

4.15 RELATIONSHIP WITH AUTHORITIES AND PUBLIC ADMINISTRATIONS

Empfänger die im Namen des Unternehmens Beziehungen zu Behörden, öffentlichen Verwaltungen, Amtsträgern, öffentlichen Be-Beneficiaries who, on behalf of the Company, have relationships with public authorities, public administrations, public officials, civil servants, and national and international organizations must adhere to the principles of legality, transparency, truthfulness, and legality, without compromising or harming the integrity and reputation of the Company in any way.

The company condemns any kind of bribery, abuse of authority, embezzlement, fraud, repudiation, and takes all necessary measures to prevent such crimes.

The beneficiaries are prohibited:

- to make or receive payments, gifts or benefits of any kind that could be of use to the Company;
- undertake actions that could cause a public servant or official to violate applicable law;
- prevent or obstruct the control and surveillance activities of public servants;
- to mislead the public administration bodies through incorrect or fraudulent conduct, so as to obtain certain behavior;

Dealing with public administrations and their employees must be correct and transparent.

4.16 DEALING WITH THE MEDIA

The company recognizes the fundamental role of the media in disseminating information and news. For this reason, relations with the representatives of the various media must be transparent.

It is important for the company to disseminate appropriate information about its own activities in order to give the public an insight into the activity and future developments. The information is provided via own communication channels or by forwarding them to the various media. Due to the importance and sensitivity of this area, communications or the dissemination of information are reserved exclusively to the competent internal departments of the company.

It is therefore forbidden to all beneficiaries to publicize and disseminate information about the company without prior express permission. It is also prohibited to disseminate or publish false or misleading information.

4.17 CUSTOMERS

The ultimate goal of the company is to answer the wishes and questions of the customers in the best possible way, on the basis of the individual requirements. Legal relationships with customers and business partners are governed by separate contracts and agreements, which should be as clear, comprehensible and understandable as possible.

The handling and the negotiations with customers and business partners must be carried out correctly and in compliance with the applicable legal provisions. The Company monitors compliance with the defined business policy, applicable internal policies and instructions, and any existing framework agreements and contracts with customers and business partners.

4.18 SUPPLIERS

When designing business relationships with current and potential suppliers, continuous analysis and market reviews are required. Supplier selection should be based on internal procedures, processes and planning tools, and on the basis of objective criteria, the profitability and usefulness of the products as well as the supplier's market position, capabilities and reliability.

In particular, the selection is based on the following criteria:

- financial soundness;

- experience in the respective market segment;
- reliability in the previous business relationships;
- resources and technical skills;
- production capacities;
- the existence of quality management systems and systems for inspection of the safety of products;
- respect for human rights, in particular as regards the protection of the rights of minors (such as child labor).

Legal relationships with suppliers are governed by separate contracts and agreements, which must be formulated as clearly and understandably as possible.

4.19 EXTERNAL CONSULTANTS, SERVICE PROVIDERS AND TEMPORARY EMPLOYEES

Relations with external consultants, service providers, professionals and temporary employees are governed by the principles of legality, correctness, honesty and transparency, and are based on separate contracts and agreements, which should be as clear, comprehensible and understandable as possible. The selection is based on the criteria of honesty, reliability, competence, and work experience as well as economic efficiency.

5 | Compliance with and Monitoring of the Code of Ethics

The Company emphasizes the importance of clear and efficient communication of the values and principles contained in this Code of Ethics. The Code of Ethics will be made available to all beneficiaries in an appropriate form, e.g. by handing over in copy, publication on the Internet, Intranet, appropriate references in the contracts and agreements to be concluded etc.

5.1 NOTES

Beneficiaries may, at any time, notify (even anonymously) the legal department of any violation or suspicion of violation of the Code of Ethics and the ethical values contained therein by e-mail to rechtsabteilung@intercable.com, or in paper form by putting it in the mailbox of the legal department on the ground floor of the registered office of the company.

It is the task of the legal department to check in due time the manner and content of the notices and to hear the sender, if known, the supposed person responsible for the violation and all other potentially involved subjects.

In compliance with the data protection regulations, the legal department treats the report with absolute confidentiality and keeps the identity of the reporter secret.

Pursuant to Act No. 179/2017 (Measures to protect whistleblowers), any direct or indirect action of retaliation or discrimination against the reporter in connection with the notice is prohibited.

Notices that turn out to be unfounded, as intent or gross negligence on the part of the reporting party, have the disciplinary and labor law consequences provided for in the following chapter.

After completing the investigations, the legal department will write a report. If the notices prove to be well founded, the legal department informs the competent company bodies and:

- proposes appropriate organizational measures;
- proposes disciplinary or labor legal measures;
- takes appropriate action if there is a reasonable suspicion of the existence of a criminal offense.

6 | Violations and Sanctions

Compliance with the provisions of this Code of Ethics constitutes an integral part of the contractual obligations of the employees and, in general, of all beneficiaries in accordance with Articles 2104 and 2106 of the Civil Code.

Failure by employees to comply with the provisions of the Code of Ethics may constitute a failure to comply with obligations under the employment contract or an inadmissible act under Art. 7, Act No. 300/1970, and may have the consequences prescribed by law, including as regards maintaining the employment relationship, and may lead to putting a claim for all incurred and resulting damages.

The imposition of any penalties for violations of this Code of Ethics under labor and other provisions shall be in accordance with the principles of consistency, impartiality, uniformity, equity and proportionality.

7 | Validity

The Code of Ethics enters into force with its publication.

Date	Edition	Typ and reason of change
16.02.2021	00	First edition EN
20.01.2022	01	Update & clarifications SAQ 4.0
14.11.2022	02	Definition Intercable Group
05.06.2023	03	Definition Intercable Group
08.02.2024	04	Definition Intercable Group