



OUR CODE OF CONDUCT



FOREWORD

At the SKB Group, we have a rich and successful history of over 130 years as a family-owned business. Our enduring success is rooted in our unwavering commitment to ethical and moral principles. We believe that the integrity we uphold in our daily operations and the personal accountability of each employee are integral to this commitment.

Our Code of Conduct aims to clearly articulate the responsibilities we must meet in today's world. These guidelines also offer straightforward instructions for adhering to these obligations. We have made the SKB Group Ethical Code available on our homepage for all our stakeholders, both internal and external. This includes our employees, suppliers, suppliers of our supplier, customers, and other third parties. By doing so, we aim to demonstrate that 'compliance' is not merely a catchphrase at SKB Group – it is a matter of utmost importance.

For our employees, a detailed set of internal regulations is readily accessible on the Intranet. We firmly believe in partnering only with companies that align with our values and adhere to our or to a similar Ethical Code. As the management and owners of SKB Group, we will neither accept nor tolerate any violation of the provisions of this Ethical Code or the internal regulations. We urge you to familiarize yourself with this Code of Conduct and the regulations. We expect your active participation in ensuring that SKB Group continues to uphold the highest ethical standards. Together, we can build a future that is not only prosperous but also rooted in integrity and respect. Thank you for being a part of this journey.

Let's continue to make a positive impact and strive for a sustainable future!

Alexander and Christoph Tremmel – Scheinost



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VISION AND MISSION

Our vision is to be a leading provider of energy cables in Europe, upholding a heritage of 130 years in family ownership, driven by a commitment to excellence, sustainability, and industry collaboration. Our products will be an essential success factor to electrify the continent and make therefore modern life possible in a sustainable way.

Our vision is to connect societies, people and businesses with our cables and therefore enable modern life in a sustainable way. The SKB Group is manufacturing and selling electrical cables for more than 130 years. In all these years we have served our European customers in utilities, wholesalers, electrical engineering, railways and industry with a versatile range of products showing proven performance. We are well positioned in our home markets (AT, CZ, SK, DE), and a substantial player in European niche markets. Our quality proven products serve the electrical grid, infrastructure of all sorts of buildings and the safety of people.



OUR VALUES

Leadership & Teamwork: We lead and work with teams by example, fostering a culture of integrity, innovation, and continuous improvement. Our leadership extends to all aspects of our business, from technical competence to sustainability. Collaboration and teamwork are essential to our success. We value diverse perspectives and work together seamlessly to achieve our goals.

Sustainable Responsibility: We are committed to sustainable responsible business practices, including ethical decision-making, and environmental stewardship.

Innovation: We foster a culture of creativity and innovation, pushing the boundaries of what's possible to develop cutting-edge cable solutions. We approach innovation with respect for tradition and a commitment to exploring new ideas that enhance customer experience and industry standards.

Trust & Transparency: Trust and Transparency are the foundation of all our relationships, both within our company and with our customers and partners. We treat every interaction with respect and integrity.

Empowerment & Joy: We believe in empowering us to our roles, fostering a sense of responsibility and accountability that drives excellence in everything we do. We believe that a positive and enjoyable work environment enhances creativity and productivity. We infuse fun and enthusiasm into our workplace.

Customer Intimacy: Our commitment to understanding our customers' needs, priorities, challenges, and aspirations allows us to provide tailored solutions and build lasting unique relationships. We exceed expectations.

Family Business: We take pride in our heritage as a family-owned business, where every employee is considered part of our extended family. This sense of belonging fosters a unique bond among our team members.

COMPLIANCE

‘Compliance’ relates to the adherence of companies, employees, and third parties to legal and internal specifications.

Our company does not tolerate any violations of the law and as such will not protect perpetrators from sanctions imposed by the authorities. Any breaches of the law, international standards or internal regulations may also have disciplinary consequences (including termination of the employment contract) and result in civil or criminal prosecution.

Violations of the law can almost always be avoided by seeking advice and further information at an early stage. In cases where there is doubt surrounding a particular conduct, especially in terms of whether this conduct is in breach of the law or other regulations, all employees and the third parties are required to consult the Compliance Officer or use designated communication channels to check the matter and specific behavior involved. Employees can also consult their line manager.

If a violation of law or company policy is suspected or confirmed, a notification—oral or written—should be promptly directed to the Compliance Officer. Notifications can be submitted in person, via email, through the secure mailbox, or by post, with anonymous submissions also accepted. All reports will be thoroughly investigated and treated confidentially. Intentionally providing false information is prohibited and may lead to disciplinary action.

The on-site Compliance Officer is the contact partner in all cases of violation of regulations and for all issues relating to this matter. The Chief Compliance Officer is responsible for establishing and maintaining the compliance system and informs the Managing Partner of any compliance-related issues arising in the business environment as part of a regular reporting process.

WHISTLEBLOWING

'Whistleblowing' is a form of communicating information and reporting misconduct, applicable to both employees and third parties. Whistleblowing measures form part of the internal control and compliance system in the employment relationship.

Acts of corruption, data misuse, and other breaches of this Code of Conduct are detrimental to both the company and society as a whole. Secure mailboxes are available for submitting anonymous notifications to the Compliance Officer, ensuring that any suspected legal or policy breaches within SKB Group companies can be reported securely.

The SKB Group will take appropriate action against any employees or third parties who are proven to have breached the Code of Conduct. Informants are advised to use the whistleblowing system responsibly and refrain from knowingly providing false information. Report forms are available for download on the intranet and can be submitted through secure mailboxes set up specifically for this purpose.

To ensure that notifications can be submitted anonymously, the secure mailboxes are situated in discrete areas without video surveillance. Secure mailboxes have been installed at the following sites:

Austria: SKB Industrieholding GmbH, Schwechater Kabelwerke GmbH

Czech Republic: PRAKAB Prazska Kabelovna s.r.o., KONEKA s.r.o.

Slovakia: ICS Industrial Cables Slovakia, spol. s r.o.

Detailed information on the various ways to report, including email addresses and locations of secure mailboxes, is available on the SKB Group website and the websites of our subsidiaries. This ensures that all relevant parties, including employees, partners, and third parties, have access to necessary resources for responsible and secure whistleblowing.

GIFTS AND INVITATIONS

Exchanging gifts and invitations with business partners is a widely recognized business practice. However, modern regulations impose more stringent restrictions on these practices than in the past.

The giving and receiving of gifts and invitations are allowed only when they are customary gestures of courtesy in general business settings and are in no way intended to influence business decisions or actions. This policy applies equally to gifts and invitations given or received at official company events or business conferences.

Offering, granting, soliciting, or accepting cash or any form of contributions that could be perceived as cash equivalents is strictly prohibited under all circumstances.

The SKB Group supports organizations and events through donations and sponsorships.

It is strictly prohibited to provide donations—whether in cash or in kind—or to grant sponsorships to individuals, political parties, or organizations whose goals conflict with our core corporate principles. All donations and sponsorship arrangements must be transparent, fully documented, and require prior approval from management.

CORRUPTION

The SKB Group adopts a zero tolerance policy as regards corruption. Our collaboration with our business partners is based on objective criteria such as quality, service, price, reliability and sustainability.

Due diligence assessments are conducted on new business partners to prevent associations with parties who do not adhere to the SKB Group Code of Conduct, especially its anti-corruption guidelines.

Any form of bribery—or attempted bribery—of SKB Group employees, trade representatives, or any individuals acting on behalf of the SKB Group is strictly prohibited. These individuals must not, under any circumstances, solicit or accept material benefits (such as cash, gifts, or personal advantages) that could be perceived as influencing business decisions. Likewise, employees from other companies, officials, or business partners must not be offered or promised personal benefits with the aim of securing a contract, business deal, or any unfair advantage for SKB Group. The promising and granting of personal benefits with the aim of securing a fair advantage (to which the SKB Group is legally entitled) is also punishable in many cases and therefore should be avoided at all costs.

CONFLICT OF INTEREST

The SKB Group expects all employees to make business decisions that prioritize the company's best interests and uphold its reputation in this regard. Employees should therefore avoid any situations that may lead to a conflict of interest.

Personal relationships or interests must not influence business activities in any way. This means that employees should ensure that personal interests do not conflict with those of the SKB Group, affect decision-making, or create even the appearance of such influence.

For instance, employees should refrain from making any investment, protecting any interest, or joining any organization that might lead third parties to question their fairness, integrity, or objectivity.



CARTEL LAW

The ban on cartels prohibits any agreements which have the purpose or effect of preventing, limiting or distorting competition. This applies to agreements made between companies at the same production or distribution level and to agreements made between companies at different production or distribution levels.

Cartel agreements are detrimental to competition, resulting in inflated prices, decreased innovation, and fewer choices for businesses and consumers.

Unlawful cartels include, in particular, agreements and concerted practices which have the purpose or effect of limiting or preventing competition. Unlawful practices include price fixing, quota agreements and the allocation of markets between competitors.

Practices by dominant companies may constitute market abuse if other companies or customers of companies are disadvantaged in any way. Unlawful practices in this context include the enforcement of excessive prices, discrimination against contractual partners, restrictions on sales and the selling of goods below cost price.

COMMITMENT TO HUMAN RIGHTS

The SKB Group is committed to fostering an inclusive and respectful environment, free from discrimination. We believe in equal value and dignity of all individuals, regardless of their race, gender, age, disability, sexual orientation, religion, or any other characteristic protected by law.

Our commitment to non-discrimination extends to all aspects of our business operations, including but not limited to hiring, training, promotions, and employee treatment.

We firmly stand against any form of discrimination, harassment, or bias. All employees, as well as our partners and third parties, are expected to uphold this principle in their interactions and professional conduct. Infringements of this policy are taken very seriously and will be promptly investigated and appropriately addressed, up to and including termination of employment or business relationships for violations.

We actively promote an environment where differences are respected and valued. Every member of the SKB Group is responsible for fostering a culture of equality and respect. Any concerns or incidents of discrimination should be reported immediately to a line manager, the Human Resources department, or through our established compliance channels.

COMMITMENT TO HUMAN RIGHTS

In adherence to our unwavering commitment to integrity and ethical conduct, the SKB Group categorically denounces all forms of slavery and child labour. We uphold the highest standards of human rights and dignity in every aspect of our operations and expect the same from our partners and suppliers.

We encourage the prompt reporting of any suspected breaches of this policy through our established compliance channels, ensuring swift investigation and action. The SKB Group remains steadfast in its dedication to continuously review and enhance our practices to prevent slavery and child labour, ensuring adherence to all relevant laws and international human rights standards.

Our stance against slavery and child labour is absolute; we do not tolerate any practices that involve forced labour, human trafficking, debt bondage, or any other forms of modern slavery. Consistent with international labour standards, we strictly prohibit the employment of individuals under the age at which compulsory schooling is completed, and under no circumstance do we employ children under the age of 15. As part of our supplier screening, we evaluate their policies on child labor and reject suppliers who employ children under 14 years old, even where local laws may permit it in line with International Labour Organization (ILO) conventions.

PROTECTION AND USE OF COMPANY PROPERTY

Every employee is required to adopt a responsible approach to company property and to protect the assets of the SKB Group against loss, damage, theft, misuse and unauthorized use. Intangible assets such as internal expertise, intellectual property rights and copyrighted works are also considered as company property and must be protected.

Any misuse of company property for non-business purposes is prohibited. Operating resources are intended for business purposes and not for personal use. Company property may therefore not be used for private purposes without the express written permission of the line manager. Private use of company property is in any case only to the extent permitted by law. Employees are also expected to adhere to the internal regulations governing company property use and to respect any relevant provisions outlined in employment contracts. Employees of the SKB Group are required to adopt a responsible approach to any operating resources entrusted to them.

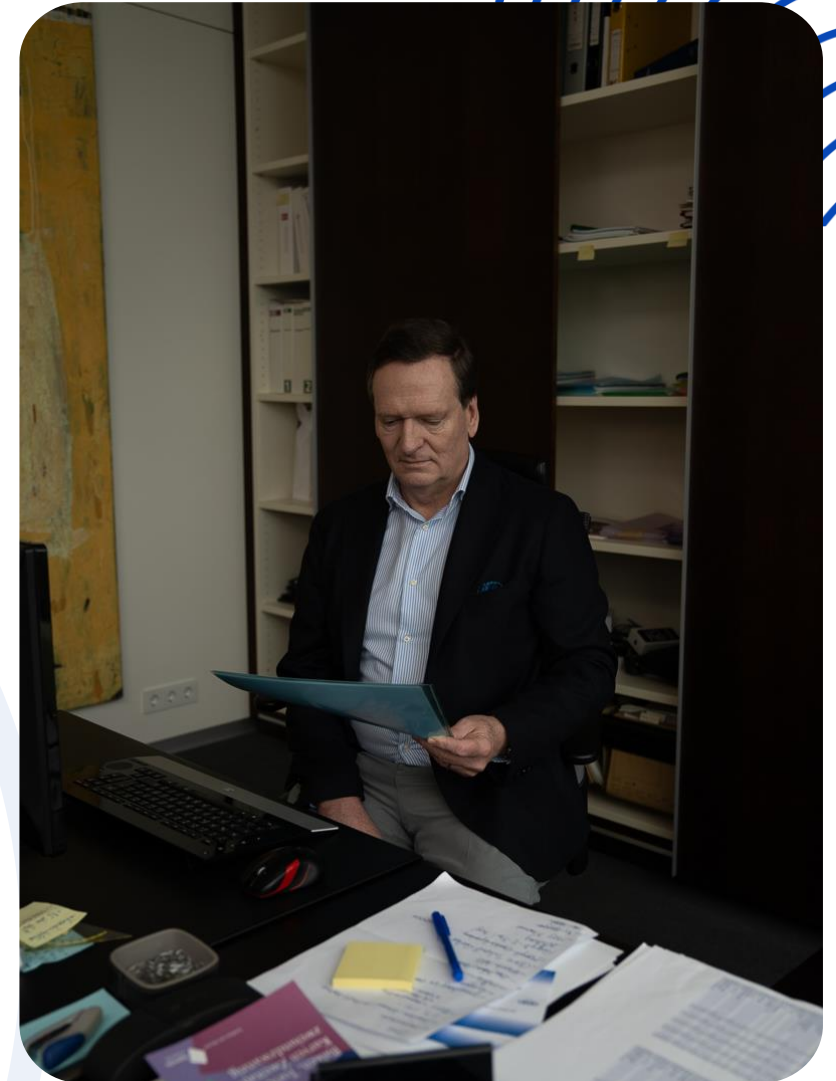
Company property may not be removed from the company premises without explicit approval of the line manager.

DATA PROTECTION AND CONFIDENTIALITY

Personal data may only be collected, processed and used within the scope of the applicable data protection laws of the relevant countries and only to the extent required for specified and legitimate purposes.

The SKB Group takes great care to protect to secure personal data against any unauthorized access and guarantees the highest of standards in this regard. Each employee is responsible for safeguarding their access credentials and ensuring data security in their role. The use of personal data must always remain transparent for those involved.

The rights of data subjects such as the right to access, modify or delete personal data must be respected.

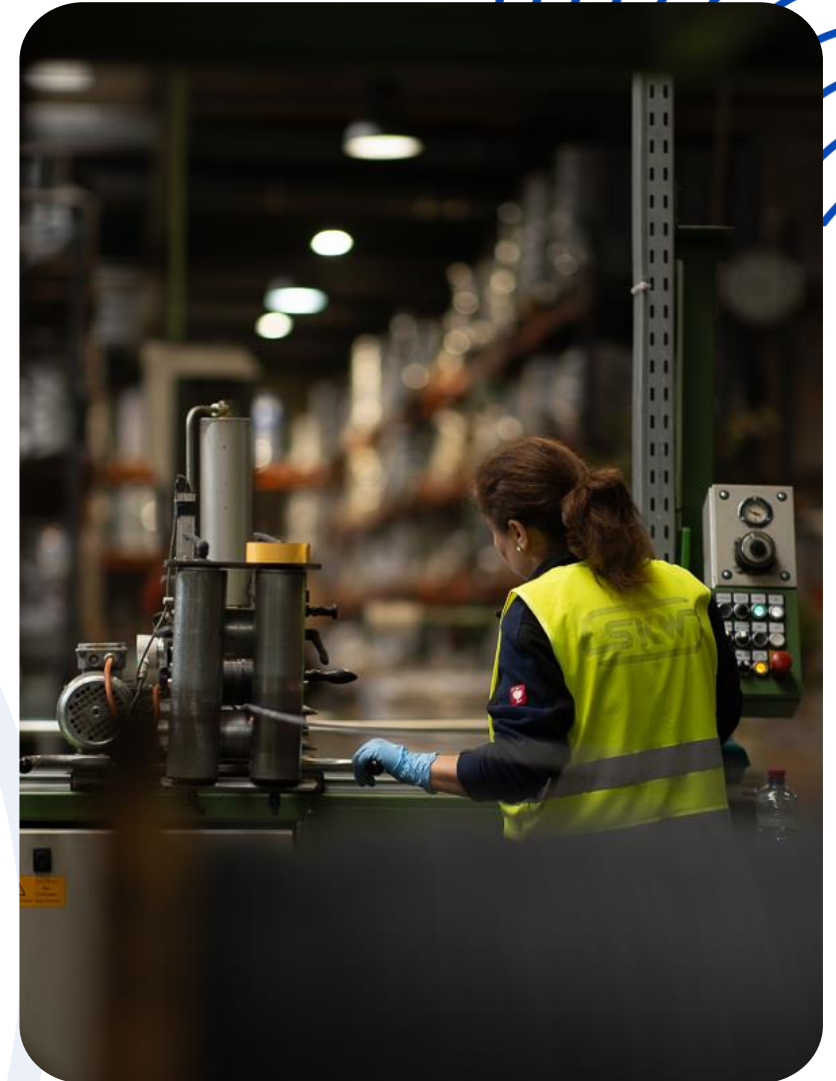


SAFETY AND ACCIDENT PREVENTION

Protecting the health and well-being of employees and avoiding accidents are key concerns of the SKB Group.

All employees of the SKB Group have a high level of responsibility for the operating equipment entrusted to them. Employees of the SKB Group are also responsible for the safety of their colleagues and customers. For this reason, the SKB Group expects its employees to demonstrate high standards when it comes to their sense of responsibility, assumption of responsibility and discipline in the workplace. Safety in the workplace, the health and well-being of employees and prevention of accidents are a top priority across the SKB Group.

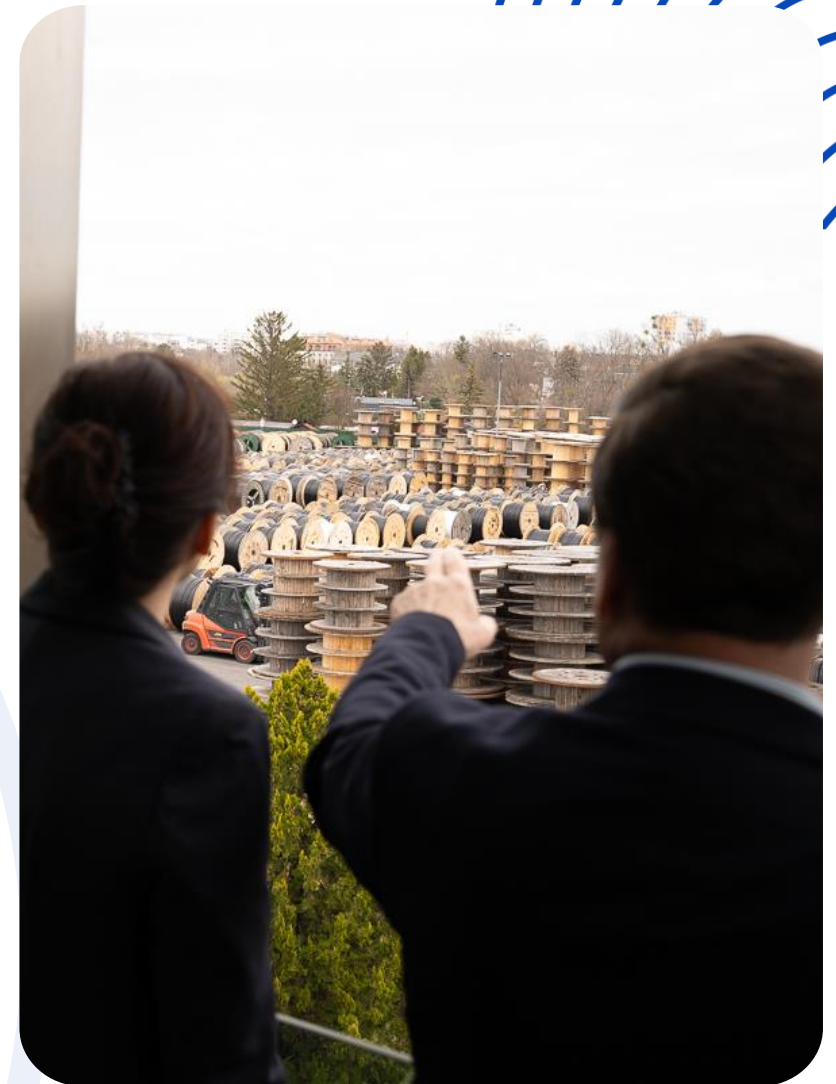
The misuse and consumption of alcohol, drugs and other intoxicants or narcotics is strictly prohibited during working hours.



VALIDITY AND CHANGES TO THE CODE OF CONDUCT

The Code of Conduct takes effect on the day of its publication and is therefore binding. It will be published both on the internet and intranet. The SKB Group is exclusively responsible for approving and publishing the Code of Conduct.

Further details about the compliance program of the SKB Group can be found on the intranet, where all documents are available for download. Any changes to the Code of Conduct will be announced on the intranet and in notices at the mailboxes.





**WE MAKE
MODERN LIFE
POSSIBLE.**