

## **SUPPLIER CODE OF CONDUCT - PROCUREMENT POLICY**

### **I. Preface**

WireCo WorldGroup is committed to honesty and integrity with respect to our business conduct towards employees, customers, suppliers, competitors and other stakeholders. WireCo WorldGroup recognizes that legal and cultural requirements vary in a global market. WireCo WorldGroup expects all of its suppliers to act with the same fairness, honesty and responsibility in all aspects of their business. This Supplier Code of Conduct (hereinafter referred to as “Supplier Code”) highlights important standards that are consistent with WireCo WorldGroup’s company values and to which each supplier of WireCo WorldGroup must strictly adhere.

### **II. The Rules**

#### **1. Application**

This Supplier Code applies to any and all suppliers, consultants, vendors, brokers, merchants, dealers, contractors, agents and other providers of other goods and services to WireCo WorldGroup worldwide (hereinafter referred to as “Supplier”).

#### **2. Compliance with the Supplier Code**

The Supplier acknowledges and agrees to comply with the standards of the Supplier Code which is an integral component of the business relationship between the Supplier and WireCo WorldGroup and mandatory for the Supplier. The Supplier will be familiar with the business practices of its suppliers and sub-contractors and will require all such suppliers and sub-contractors to comply with this Supplier Code. To clarify any issues relating to the Supplier Code, the Supplier will contact the Procurement Department of WireCo WorldGroup.

#### **3. Compliance with Laws, Rules and Legal Regulations**

The Supplier will comply with any and all applicable laws, rules and legal regulations in the countries in which it operates and will maintain a system to monitor compliance with such laws, rules and legal regulations.

#### **4. Respect for Human Rights**

The Supplier will treat all individuals with respect and fairness and will observe basic human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations and the Tripartite Declaration of Principles concerning Multinational

Enterprises and Social Policy of the UN International Labor Organization (ILO), including, but not limited to, the prohibition of forced or child labor, and the provision of reasonable wages, social benefits, working hours, freedom of association and other fair working conditions in compliance with applicable laws. The Supplier will maintain an environment with no retaliation, free of discrimination and harassment on the basis of gender, age, race, skin color, ethnicity or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any other characteristics protected by applicable law.

#### 5. Antitrust and Competition Law Compliance

The Supplier will strictly comply with all applicable antitrust laws, trade practice laws and any other laws, rules and regulations dealing for example with monopolies, unfair competition, restraints of trade and competition, and relationships with competitors and customers. The Supplier will not enter into agreements with competitors and other acts, which may unfairly impact competition, including, but not limited to, price fixing or market allocations.

#### 6. Anti-Corruption

The Supplier will comply with applicable laws and regulations concerning anti-corruption, including those concerning foreign corrupt practices. The Supplier will not engage in nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company or government official for the purpose of influencing the decision-making process whether or not in violation of applicable laws. The Supplier will never offer, grant, demand or accept bribes, illegal payments, payoffs, kickbacks, incentives, gifts, entertainment, favors or other benefit of a value in exchange for business opportunities with or in any way related to the business operations of WireCo WorldGroup.

#### 7. Product Safety, Health, and Environment

The Supplier will be committed to manufacture and deliver safe products to WireCo WorldGroup and provide a safe working environment that supports accident prevention and minimizes exposure to health risks to the Supplier's employees. The Supplier will comply with applicable laws and regulations on environmental protection and will preserve resources and protect the environment as much as possible.

#### 8. Data Protection, Confidential Information and Intellectual Property

The Supplier will comply with all applicable laws concerning data protection. It is the Supplier's responsibility to ensure that any confidential business information or trade



secrets gained by virtue of the business activities with WireCo WorldGroup (hereinafter referred to as “Confidential Information”) is held in strict confidence and not improperly used or disclosed to third parties. Furthermore, the Supplier will protect and secure WireCo WorldGroup’s intellectual property as Confidential Information.

#### 9. Export and Import Regulations

Suppliers will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods and technology.

#### 10. Violations of the Supplier Code

The provisions of this Supplier Code are essential for the business relationship between WireCo WorldGroup and the Supplier. Therefore, if the Supplier does not comply with the Supplier Code, WireCo WorldGroup reserves the right to terminate the business relationship with the Supplier subject to applicable laws.