



CODE OF CONDUCT

A close-up photograph of a hand holding a black pen, positioned in the bottom left corner of the page. The hand is wearing a dark suit jacket and a white shirt cuff. A horizontal white line is drawn across the page, starting from the hand and extending to the right.

Vers. 1.0 June 2023

1. INTRODUCTION

Scankab is an independent company, wholly owned by the TOP CABLE GROUP. Headquartered in Denmark, Scankab is represented by sales offices and logistics centres strategically located across Scandinavia:

- Scankab Nordic A/S, Denmark
- Scankab Cables A/S, Denmark, including Germany & Export
- Scankab Systems A/S, Denmark
- Scankab Cables AS, Norway
- Scankab Cables AB, Sweden

TOP CABLE GROUP is a family-owned business with more than 35 years of experience in the manufacturing of electrical cables and is widely recognised as one of the leading companies in the global market.

We manufacture high-quality cables in an efficient, ethical and sustainable way, in full compliance with international and EU regulations and standards.

1.1. Mission

- To be a family-owned, globally recognised and innovative manufacturer that contributes positively to societal development.
- To cultivate a motivated team that shares the company's values and is proud to be part of the organisation.
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1.2. Vision

- To expand our global activities.
- To establish long-term partnerships with leading customers and suppliers.
- To offer a comprehensive portfolio of cables with high added value.
- To attract and retain a skilled and committed workforce that supports our growth.
- To maintain financial strength and long-term profitability.
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1.3. Our Values

Our corporate culture is rooted in:

- Honesty
- Professionalism
- Commitment
- Efficiency
- Responsibility

Scankab's most valuable asset is its highly qualified team of professionals who are committed to integrity, ethical conduct and professionalism in all business activities.

The purpose of this Code of Conduct is to uphold business ethics and promote corporate social responsibility as a foundation for the sustainable development of our company. This Code defines the behavioural standards expected of all employees in the performance of their duties.

2. OBJECTIVE

The Scankab Code of Conduct applies to all individuals working for or collaborating with Scankab, regardless of their hierarchical level, geographical location, functional role, or the specific Scankab entity to which they are assigned. Employees who are also subject to other internal rules or ethical frameworks derived from national legislation in the countries where they operate must likewise comply with those regulations.

All employees must be familiar with and acknowledge the contents of this Code of Conduct, and are required to comply with it from the moment they join the company. Scankab employees who manage or supervise others are responsible for ensuring that their team members understand and comply with the Code. They are expected to lead by example and act as role models for ethical behaviour.

Failure to comply with the Code of Conduct and its underlying behavioural principles may result in disciplinary action in accordance with applicable regulations, or legal proceedings when necessary, depending on the severity of the violation.

3. COMPLIANCE AND GOVERNANCE

The TOP CABLE GROUP has established an Ethics Committee responsible for overseeing compliance with the Code of Conduct. Any employee of the TOP CABLE GROUP, including Scankab, who has doubts regarding the interpretation of the Code or identifies a potential breach may contact the committee by email at etica@topcable.com.

The Ethics Committee will regularly report to Group Management on the measures taken to uphold compliance with the Code of Conduct, either annually or as required.

Group Management has overall responsibility for promoting and monitoring the company's ethical culture, assisted by the Ethics Committee. The Committee's responsibilities include:

- Promoting awareness, understanding and compliance with the Code of Conduct.
- Responding to questions, concerns or incidents related to ethical behaviour.
- Identifying and mitigating risks, implementing control measures to assess adherence to the Code, and acting in cases of potential non-compliance.
- Ensuring that employees or third parties who report violations are protected from any form of retaliation, while safeguarding their anonymity.
- Conducting an annual assessment of compliance with the Code of Conduct.
- Establishing the necessary procedures and action protocols to ensure effective enforcement of the Code.

4. ETHICAL PRINCIPLES

4.1. Respect for Human Rights

Scankab respects, upholds and promotes internationally recognised human rights conventions, as well as all applicable national legislation, both within the workplace and throughout its broader sphere of influence.

4.2. Compliance with Applicable Law

Scankab is fully committed to strict compliance with the laws and regulations of the countries in which it operates, including national transparency laws such as the Norwegian Åpenhetsloven. We ensure that no employee engages in any unlawful activity that could harm the company's reputation or interests, or in conduct which, even if not illegal, could damage Scankab's public standing.

Scankab strictly prohibits employees from establishing or maintaining business relations with customers or suppliers involved in illegal practices such as prostitution, drug trafficking, arms smuggling, human trafficking, extortion or bribery. We are committed to combating corruption in all its forms, including extortion and bribery.

4.3. Environmental Responsibility

Scankab is committed to conducting its operations in a manner that respects and promotes environmental stewardship and responsible business practices.

4.4. Respect for Employee Rights

Scankab respects and guarantees the rights of all employees, regardless of status, and does not tolerate discrimination based on gender, race, religion, age or any other protected characteristic.

We uphold freedom of association and the right to collective bargaining, the prohibition of forced labour in all its forms, and the elimination of child labour. We ensure that no company activity contributes to the exploitation of minors.

We believe in equal opportunity and apply it consistently across all organisational processes. We strive to safeguard and promote workplace health and safety through preventative measures and by ensuring compliance with all applicable legislation.

All employees must conduct themselves in a way that protects the company's reputation and reflects accuracy, ethics and professionalism.

Employees are required to use company assets responsibly and protect all information concerning the organisation and its stakeholders.

4.5. Our Customers

Scankab is a customer-focused organisation that develops high-quality products and services which comply with all regulatory requirements and create long-term value.

We act with honesty, transparency and independence in all customer relations, providing accurate information and ensuring responsible decision-making.

4.6. Business Partners and Suppliers

We aim to be perceived by our suppliers as a trustworthy and reliable partner who meets contractual obligations and ensures timely payment. In return, we expect our suppliers and business partners to uphold our values and align with us socially, economically and environmentally.

4.7. Society and Local Communities

Scankab is committed to contributing positively to the communities in which we operate. We support economic and social development through job creation, knowledge-sharing and participation in relevant social initiatives.

5. GENERAL RULES

Scankab employees are required to comply with a set of general behavioural rules from the moment their employment begins.

5.1. Legality and Ethical Conduct

All Scankab employees must respect the company's ethical principles and comply with all applicable laws in the countries in which we operate. Employees are expected to act with integrity and ensure that their conduct reflects Scankab's commitment to legality and ethical business practice.

No employee may collaborate with, facilitate or participate in any actions that violate the law or undermine respect for legal behaviour.

5.2. Professionalism, Honesty and Integrity

All Scankab employees must perform their duties with the highest level of professionalism, honesty and integrity. Decisions and actions should always reflect responsible judgement and adherence to our corporate values.

5.3. Use of IT Systems, Email and Internet

Scankab provides employees with the IT tools and communication systems necessary to carry

out their professional tasks efficiently. Computers, mobile phones, terminals, email and internet access are company-owned resources provided exclusively for business purposes.

All employees must use these resources responsibly and appropriately, and must take reasonable steps to prevent misuse that could damage the company's interests or compromise the security of our communication systems.

5.4. Confidentiality of Information

All Scankab employees are required to maintain strict confidentiality regarding any information accessed in the course of their work. This includes, but is not limited to, personal data related to employees, partners, collaborators or subcontractors.

Such information may not be used for personal gain or disclosed to unauthorised third parties. The duty of confidentiality remains in force even after the termination of the employment relationship.

5.5. Conflicts of Interest

Employees must avoid all situations in which their personal interests may conflict, or be perceived to conflict, with the interests of Scankab. Any professional decision must be based on transparency, fairness and the best interest of the company, without influence from personal, family or external considerations.

5.6. Gifts and Hospitality

The giving or acceptance of gifts is generally prohibited. Exceptions may be allowed only when the gift is of symbolic or minimal value, represents customary business courtesy, and is not prohibited by law. Under no circumstances may employees offer or accept cash or cash equivalents.

No gift, favour or hospitality may be given or accepted if it may influence, could appear to influence, or could reasonably be perceived as influencing a business decision.

In cases of doubt, the gift should be declined, or guidance should be sought from the Ethics Committee.

5.7. Bribery, Fraud and Corruption

Scankab maintains a zero-tolerance policy toward bribery, fraud and corruption in any form. All business activity must be conducted with honesty and transparency, and no employee may engage in or conceal corrupt practices, either directly or indirectly.

5.8. Respect for People

All employees are expected to treat colleagues, supervisors, subordinates and third parties with dignity and respect. Any form of harassment, intimidation or discriminatory conduct is strictly prohibited.

5.9. Customers

Employees must treat customers with respect, honesty and professionalism. Communication, responsiveness and punctuality are essential, with the objective of consistently meeting – and where possible exceeding – customer expectations.

5.10. Suppliers

Supplier selection must be based on objective, professional and impartial criteria. Employees must avoid conflicts of interest, favouritism or preferential treatment. All supplier information and proposals must be handled with strict confidentiality and may only be shared with authorised parties or when required by law.

5.11. Partners and Collaborators

Relationships with business partners and collaborators must be grounded in mutual trust, transparency, professional integrity and respect for free competition.

6. VALIDITY

The current version of Scankab's Code of Conduct was last revised on 26 June 2023.

Scankab – Document traceability	
Document titel:	ENG_Scankab_Code_Of_Conduct_JuneV1_2023
Scope:	Applies globally to all companies within the Scankab Group
Version:	Version: 1.0 – June 2023