BRUGG CABLES
Well connected.

Terna Energy Solutions



SUPPLIER CODE OF CONDUCT

供应商行为准则

Message from the CEO
首席执行官致辞



To our suppliers,
致：各位供应商

At Brugg Cables, sustainability is not just a responsibility – it is a commitment to future generations. We strive to continuously reduce our environmental footprint and integrate sustainable thinking into every decision we make.
在 Brugg Cables，可持续发展不仅是一份责任，更是我们对子孙后代的承诺。我们致力于持续降低对环境的影响，将可持续理念融入每一项决策之中。

As part of Terna, we are connected to a larger purpose: build a reliable, cutting-edge energy infrastructure to act with integrity and drive sustainable growth and create long-term value.
身为 Terna 的一员，我们肩负着更宏大的使命：构筑可靠前沿的能源基础设施，秉持诚信立身之本，推动可持续增长，共创长期价值。

Our responsibility extends beyond our own operations. We expect our partners to uphold the same principles we've embraced across their supply chain, ensuring transparency, accountability, and continuous improvement. Respect for human dignity is fundamental not just to our business, but also to who we aspire to be as individuals and members of our communities. Accordingly, we are committed to fair, safe, and inclusive working conditions and stand firmly against any form of discrimination, forced labour, or exploitation.
我们肩负的责任，从未止步于自身的运营范畴。我们期待所有合作伙伴在全供应链体系中践行与我们一脉相承的理念，确保全程透明、权责清晰、持续精进。对人格尊严的恪守，既是我们商业经营的立身之本，也是我们作为个体、作为社会一份子的处世底线。为此，我们全力打造公平、安全、包容的工作环境，对任何形式的歧视、强迫劳动与剥削行为零容忍。

We also recognize that protecting the environment is a shared responsibility. By working closely with our partners, we aim to minimize environmental impact, preserve natural resources, and continuously improve our performance.
我们同样深知，环境保护是一项共同责任。通过与合作伙伴紧密协作，我们力求最大限度降低环境影响，保护自然资源，持续提升环境绩效。

Our values - integrity, respect, and responsibility - guide everything we do. They are the foundation of trust and the basis for strong, lasting partnerships.
诚信、尊重、责任是我们的核心价值观，指引着我们的一切行动。它们是信任的基石，也是构建稳固、长久合作关系的基础。

Together, let us act responsibly, lead with integrity, and shape a well-connected future.
让我们携手同行，践行责任，坚守诚信，共筑互联互通的美好未来。

Sincerely,
此致

Gianluca Vettese
詹卢卡・韦泰塞
CEO Brugg Cables
Brugg Cables 首席执行官



Purpose

For the **Brugg Cables Group** (“the Company”) and its mother company **Terna,** ethical business conduct is of paramount importance. This guideline contains the principles we expect our suppliers to follow, along their own supply chain. The principles are based on Terna’s Code of Ethics (see www.terna.it) and the Company’s “Ethics Annex” (see www.bruggcables.com).

目的

对 Brugg Cables 集团（下称 “公司”）及其母公司 Terna 而言，恪守商业道德是经营的首要原则。本准则明确了供应商需在其自身全供应链中遵行的各项要求，其制定以 Terna《道德准则》（详见 www.terna.it）及公司《道德附件》（详见www.bruggcables.com）为基准。

Addressees

All suppliers, subcontractors, agents, consultants and joint ventures serving the **Brugg Cables Group** and its entities, worldwide.

适用对象

全球范围内为 Brugg Cables 集团及其下属实体提供服务的所有供应商、分包商、代理商、顾问及合资企业

Principles 核心原则

1. Compliance with the laws
遵守法律法规

Suppliers are expected to comply with all applicable rules and regulations, on a national and international level, wherever they operate, and along their entire supply chain.
供应商在其所有运营区域及整个供应链范围内，均应遵守各项适用的国家及国际规则与监管要求。

2. Fair competition
公平竞争

Suppliers are expected not to breach applicable fair competition principles, and to respect all applicable anti-trust legislation.
供应商不得违反适用的公平竞争原则，应遵守所有适用的反垄断法律法规。

3. Prevention of corruption, money laundering and conflicts of interest
反腐败、反洗钱与利益冲突防范

Suppliers shall not practice nor tolerate active or passive bribery or corruption, neither in their own supply chain nor vis-a-vis the Company. In particular, Suppliers shall refrain from offering a Company's employee any kind of advantages (monetary or non-monetary) and take adequate measures to prevent money laundering. Suppliers shall report any situation that could lead to a conflict of interest, thus interfering with a long-term, mutually beneficial relationship with the Company.
供应商不得实施或纵容任何主动或被动的贿赂及腐败行为，无论是在其自身供应链中，还是在与公司的业务往来中。供应商尤其不得向公司员工提供任何形式的利益（包括金钱与非金钱利益），并应采取充分措施防范洗钱行为。对于可能引发利益冲突、进而损害与公司长期互利合作关系的情形，供应商应及时上报。

4. Protection of sensitive information and intellectual property
敏感信息与知识产权保护

Suppliers shall ensure adequate protection of Company's sensitive, personnel and confidential information and shall respect Company's intellectual property rights.
供应商应确保对公司的敏感信息、人事信息及保密信息进行充分保护，并尊重公司的知识产权。

5. Human rights and equal opportunities; prohibition of discrimination
人权与机会平等；禁止歧视

Suppliers shall respect the universal human and workers' rights as defined in the UNO's Universal Declaration of Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work. In accordance with these principles, suppliers undertake to respect the personal dignity, physical integrity and privacy of each individual and avoid any form of discrimination, be it based on race, colour, gender, sexual orientation, language, religion, political opinion, nationality, social background or status, union or party membership, age, state of health, disability or the like.
供应商应遵守联合国《世界人权宣言》及国际劳工组织《工作中的基本原则和权利宣言》所确立的普遍人权与劳工权利。依据上述原则，供应商承诺尊重每一个人的人格尊严、人身安全与隐私，杜绝任何形式的歧视，无论其基于种族、肤色、性别、性取向、语言、宗教、政治主张、国籍、社会出身或地位、工会或党派身份、年龄、健康状况、残疾或其他类似因素。

6. Prohibition of mobbing, harassing and any form of physical abuse
禁止职场霸凌、骚扰及任何形式的身体虐待

Suppliers shall not allow nor tolerate any form of verbal, physical or psychological abuse including mobbing, any form of harassing, molesting, threatening, intimidating, inhuman or degrading treatment, and any form of corporal punishment.
供应商不得允许或纵容任何形式的言语、身体或心理虐待，包括职场霸凌、各类骚扰、猥亵、威胁、恐吓、不人道或有辱人格的待遇，以及任何形式的体罚。

7. Prohibition of forced and child labour
禁止强迫劳动与童工

Suppliers shall not allow nor tolerate any form of modern-day slavery, forced or child labour, or any form of undeclared or exploitative work. Any employment of adolescents must be based on applicable law and a written labour contract granting the youth adequate work, health and learning conditions and supervision by qualified personnel.
供应商不得允许或纵容任何形式的现代奴役、强迫劳动、童工，以及任何未申报的剥削性用工行为。未成年工的聘用必须符合适用法律规定，并签订书面劳动合同，保障未成年人享有适宜的工作、健康与学习条件，并由合格人员进行监督管理。

8. Freedom of association
结社自由

Suppliers are expected to grant their employees and associated temporary workers the right to associate freely, bargain collectively, and join union associations, to the extent permitted by local law.
在当地法律允许的范围内，供应商应保障其员工及相关临时工享有自由结社、集体谈判及加入工会组织的权利。

9. Fair remuneration and working hours
公平薪酬与工作时长

Suppliers shall grant their employees and associated temporary workers fair compensation in accordance with applicable local law or collective agreements in place. Equal work shall be compensated equally. The required working hours shall not exceed the maximum number of working hours as permitted by applicable local law or collective agreements in place.
供应商应依据适用的当地法律或现行集体协议，向其员工及相关临时工支付公平薪酬，实行同工同酬。工作时长不得超出适用当地法律或现行集体协议规定的最高时限。

10. Protection of health and safety
健康与安全保护

Suppliers shall grant their employees and associated temporary workers a safe, healthy work environment. They shall comply with applicable occupational health and hygiene standards and implement all required measures to prevent occupational injury or illness. To continuously improve the working conditions, suppliers are expected to organize regular trainings and audits and implement management systems that document and certify their health and safety efforts.
供应商应为其员工及相关临时工提供安全、健康的工作环境，遵守适用的职业健康与卫生标准，落实各项必要措施，预防职业伤害与职业病。为持续改善工作条件，供应商应定期组织培训与审计，并建立管理体系，对其健康与安全工作进行记录与认证。

11. Environmental protection
环境保护

Suppliers shall strive to minimise any negative impact of their operations, products or services on the environment, by means of sustainable use of natural resources, reliance on renewable energy sources, proper waste disposal, reduction of greenhouse gas emissions, and responsible handling of biodiversity and ecosystems. For such purpose, they organize regular trainings and audits and implement management systems that document and certify their environmental protection efforts along their entire supply chain and product life cycle. Suppliers shall contribute to climate objectives by monitoring, reporting and continuously reducing greenhouse-gas emissions across their operations and value chain.
供应商应通过可持续利用自然资源、使用可再生能源、规范废弃物处置、减少温室气体排放、负责任地维护生物多样性与生态系统等方式，力求最大限度降低其运营、产品或服务对环境的负面影响。为此，供应商应定期组织培训与审计，并建立管理体系，对其整个供应链及产品生命周期内的环境保护工作进行记录与认证。供应商应通过对其运营及价值链中的温室气体排放进行监测、报告与持续削减，助力气候目标的实现。



12. Responsible sourcing and traceability
负责任采购与可追溯性

Suppliers shall source strategic raw materials responsibly, with particular attention to conflict minerals, including tin, tantalum, tungsten and gold (3TG), and other minerals originating from conflict-affected and high-risk areas and implement risk-based supply chain due diligence to identify, prevent, mitigate and address risks of human rights abuses, financing of armed groups and other adverse impacts associated with mineral extraction, trade and processing. Suppliers shall establish and maintain traceability of material origins, including countries of origin and, where applicable, extraction sites, smelters and refiners, supported by reliable records across their operations and value chain.

供应商应以负责任的方式采购战略性原材料，尤其关注冲突矿产 —— 包括锡、钽、钨和金（3TG）—— 以及源自受冲突影响和高风险地区的其他矿产。供应商应实施基于风险的供应链尽职调查，以识别、预防、减轻和处理与人权侵害、资助武装团体以及矿产开采、贸易和加工所附带的其他不利影响相关的风险。供应商应建立并维护原材料来源的可追溯性，涵盖原产国及（如适用）开采地点、冶炼厂和精炼厂，并以其运营及价值链中的可靠记录作为支撑。

13. Organizational Model
组织模式

By adopting this guideline, suppliers acknowledge **Terna's** Organizational & Management Model (OMM) in accordance with the provisions of Italian Legislative Decree 231/2001 (see www.terna.it). The OMM aims at preventing offences, both inside and outside Italy, identified in the decree, including bribery and corruption. **Terna** is Italy's transmission systems operator and the owner of **Brugg Cables Group.**

供应商采纳本准则，即视为认可 Terna 依据意大利第 231/2001 号立法令制定的《组织与管理模式》（OMM）（详见 www.terna.it）。该模式旨在防范该法令所列的境内外各类违法行为，包括贿赂与腐败。Terna 是意大利输电系统运营商，同时也是 Brugg Cables 集团的母公司。

14. Compliance verification
合规核查

Suppliers acknowledge that the Company reserves the right to verify compliance with the principles of this guideline at any time, with particular focus on EHS (environmental, health and safety) and sustainability requirements. Suppliers agree to cooperate with Company in the context of sustainability assessments, supplier performance monitoring and continuous improvement initiatives to support the ongoing enhancement of ESG performance. Suppliers acknowledge the Company's right to request corrective measures in case of non-compliance and to propose remedial action in case of identified gaps or terminate cooperation in case of serious non-compliance.

供应商确认，公司保留随时核实其对本准则各项原则合规情况的权利，尤其聚焦于 EHS（环境、健康与安全）及可持续发展要求。供应商同意配合公司开展此类可持续发展评估、供应商绩效监测及持续改进计划，以支持 ESG 绩效的不断提升。供应商确认，若发生不合规情形，公司有权要求其采取纠正措施；若发现差距，公司有权提出补救行动；若出现严重不合规，公司有权终止合作。

15. Duty to improve and report
改进与上报义务

Suppliers shall implement their own compliance programs, conduct periodic (self-)assessments, and document their improvement efforts continuously. Suppliers shall invite their employees and associated temporary workers to report any breach of the principles listed in this guideline to the Company (whistleblowing@bruggcables.com) or Terna (whistleblowing@terna.it). Reports may also be submitted online, at https://whistleblowing.terna.it/.

供应商应建立自身的合规管理体系，定期开展自我评估，并持续记录改进工作进展。供应商应鼓励其员工及相关临时工，就任何违反本准则所列原则的行为，向公司（举报邮箱：whistleblowing@bruggcables.com）或 Terna（举报邮箱：whistleblowing@terna.it）进行举报。举报人也可通过线上渠道提交举报，网址为：https://whistleblowing.terna.it/。

16. Trade Compliance
贸易合规

Suppliers shall inform the Company transparently and correctly about the customs and export control classification of their goods, especially if such goods are subject to special trade regulations (dual-use, dangerous substances, or the like). Suppliers shall assure adequate due diligence checks along their own supply chain, in compliance with applicable sanctions and embargo regulations.

供应商应就其货物的海关及出口管制归类向公司作出透明、准确的说明，尤其当货物受特殊贸易法规管制时（如两用物项、危险物质等）。供应商应遵守适用的制裁与禁运法规，在其自身供应链内开展充分的尽职调查。

17. Duty to assure compliance along the entire supply chain
全供应链合规保障义务

Suppliers shall promote the principles of this guideline broadly, among their employees and associated temporary workers as well as among their own suppliers and subcontractors.

供应商应在其员工、相关临时工以及其自身供应商与分包商范围内，广泛宣导本准则的各项原则。

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www.bruggcables.com