BRUGG CABLES
Well connected.

Terna Energy Solutions



SUPPLIER CODE OF CONDUCT

Message from the CEO



To our suppliers,

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.

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.

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.

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.

Our values - integrity, respect, and responsibility - guide everything we do. They are the foundation of trust and the basis for strong, lasting partnerships.

Together, let us act responsibly, lead with integrity, and shape a well-connected future.

Sincerely,

Gianluca Vettese
CEO Brugg Cables



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).

Addressees

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

Principles

1. **Compliance with the laws**
   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.

2. **Fair competition**
   Suppliers are expected not to breach applicable fair competition principles, and to respect all applicable anti-trust legislation.

3. **Prevention of corruption, money laundering and conflicts of interest**
   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.

4. **Protection of sensitive information and intellectual property**
   Suppliers shall ensure adequate protection of Company's sensitive, personnel and confidential information and shall respect Company's intellectual property rights.

5. **Human rights and equal opportunities; prohibition of discrimination**
   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.

6. **Prohibition of mobbing, harassing and any form of physical abuse**
   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.

7. **Prohibition of forced and child labour**
   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.

8. **Freedom of association**
   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.

9. **Fair remuneration and working hours**
   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.

10. **Protection of health and safety**
    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.

11. Environmental protection

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.

12. Responsible sourcing and traceability

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.

13. Organizational Model

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.**

14. Compliance verification

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.

15. Duty to improve and report

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/.

16. Trade Compliance

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.

17. Duty to assure compliance along the entire supply chain

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.



BRUGG CABLES
Well connected.

Terna
Energy
Solutions

www.bruggcables.com