ENV-PL-001-EN

Sustainability Policy

BRUGG KABEL SERVICES AG
BRUGG KABEL AG
BRUGG KABEL MANUFACTURING AG

CEO Message

To our stakeholders,

At Brugg Cables, embedding sustainable practices across our operations while manufacturing the high-performance cables and accessories that power the energy transition and electrification is foundational to how we build for the future.

As part of the Terna Group, we are dedicated to developing reliable energy infrastructure, acting with integrity, and creating long-term value for our communities and partners. This ESG policy consolidates our environmental, procurement, social, and ethical commitments into a single, comprehensive framework guiding our entire value chain. We believe that true leadership requires accountability at every level, from our manufacturing plants to our supplier network.

Our responsibility extends across our entire value chain. We are firmly committed to safe, inclusive working conditions, prioritizing employee health and safety, and upholding human rights and high ethical standards. Guided by circular economy principles and science-based decarbonization pathways, we also strive to minimize our environmental impact, preserve natural resources, and lead the energy transition with sustainable products.

Our core values - integrity, respect, and responsibility - guide everything we do, ensuring that our growth is always aligned with the well-being of people and the planet.

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

Sincerely,

Gianluca Vettese

Brugg Cables CEO

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1. Introduction & Purpose

This document consolidates Brugg Cables Group's sustainability (ESG) commitments into formal, board-endorsed policy statements covering Environment, Sustainable Procurement, Social and Ethics topics. It is designed to:

- Give employees, suppliers and customers a single reference for the Group's ESG commitments;
- Provide the auditable policy evidence required by external ESG assessments.

Each policy section below follows a consistent structure - Scope, Governance & Responsibility, Objectives/Targets, Review & Update Mechanism, and Key Issues Covered - aligned with recognized policy-quality criteria (objectives, governance, review cadence, defined scope, and full coverage of the material sustainability issues identified for Brugg's industry, "Manufacture of Wiring and Wiring Devices").

2. Scope & Applicability

Unless otherwise stated, all policies in this Framework apply to Brugg Kabel Services AG, Brugg Kabel Manufacturing AG, and Brugg Kabel AG (including all the subsidiaries below, also referred to as “Brugg Cables Group” or “Brugg Cables”), all production sites, and all subsidiaries under operational control, and are binding on all employees, and - where noted - extended to suppliers and business partners through contractual clauses and the Supplier Code of Conduct.

3. Roles & Responsibilities

Brugg Cables Group's ESG governance structure allocates clear ownership for policy definition, implementation and oversight:

- Strategic direction: Management Board.
- Policy ownership: each policy in this document has a named accountable function (see individual sections).
- Coordination: a cross-functional ESG working group consolidates policy status, monitors implementation, and prepares periodic reporting to the Management.
- Data & reporting: ESG KPIs referenced in this document are consolidated annually and disclosed in Brugg's Sustainability Report and in relevant external assessments (EcoVadis, etc.).

This document and each policy within it are subject to a structured and cyclical monitoring and review process, which ensures its implementation, measurability, and continuous improvement across all thematic areas. The process is based on Brugg’s certified management systems and on a *Plan–Do–Check–Act* cycle.

Review Governance

- QHSE team: coordinates the monitoring of targets, KPIs, and the review process and reports directly to the CEO.
- Management: oversees the progress of the Plan, validates targets, and approves corrective actions.
- Operational Divisions: monitor KPIs within their respective remits and implement improvement actions.

Levels and Cadence of the Review

- Continuous (operational): QHSE Team continuously monitoring KPIs and risks and report to management during recurring meetings.
- Annual: Internal review of the quantitative targets, public reporting of the progress in the Sustainability Report.
- Bi-annual: review of management systems; review of the policies with Board approval.
- Periodic/multi-year: review of the materiality analysis with stakeholder engagement; third-party audit.

Updating Targets and Corrective Actions

At each review, results are compared against the dated targets; in the event of deviations, corrective actions are defined with assigned responsibilities and timelines. Targets may be updated or strengthened based on achieved results, regulatory developments, and stakeholder expectations, according to the principle of continuous improvement. Furthermore, Targets are also updated whenever:

(i) A material change occurs in regulation
(ii) A new material sustainability topic is identified, or
(iii) Findings from internal audits, external assessments (e.g. EcoVadis, customer audits) or stakeholder engagement indicate a gap.

Reporting and Transparency

The monitoring outcomes are communicated annually through the Sustainability Report, prepared according to GRI and ESRS standards, ensuring traceability and multi-year comparability of KPIs.

4. Policy Statement & Commitments

4.1. Environmental Policy

At Brugg Cables, environmental stewardship is a fundamental pillar of our corporate strategy and operational excellence, fully aligned with the sustainability commitments of the Terna Group. We are committed to minimizing our environmental impact across the entire lifecycle of our high-voltage and industrial cabling solutions. This Environmental Policy establishes our commitment to

decarbonizing our operations through responsible energy consumption and greenhouse gas (GHG) emissions reduction, protecting water resources, and optimizing the management of raw materials, chemicals, and industrial waste. Guided by circular economy principles, we design and produce cables that emphasize environmental performance during product use, support sustainable product end-of-life solutions through recyclability, and strictly guarantee customer health and safety at every stage. Through continuous innovation, certified management systems, and active stakeholder engagement, we strive to lead the energy transition with responsible, safe, and sustainable products.

To translate this vision into operational practice and in full compliance with ISO 14001 standards, Brugg Cables commits to:

- **Compliance Obligations**: Strictly comply with all applicable environmental laws, regulations, legal obligations, and voluntary agreements subscribed to by the organization and the Terna Group.
- **Environmental Protection & Pollution Prevention**: Protect the environment and proactively prevent pollution by controlling operational risks, implementing best available techniques (BAT), and applying life-cycle thinking to our cable manufacturing processes.
- **Continuous Improvement**: Continually improve our Environmental Management System (EMS) and environmental performance through measurable objectives, periodic performance tracking, and regular management reviews.

In line with ISO 14001 principles, the key environmental issues identified for our wiring and wiring devices industry operations are:

1. **Energy consumption & GHG emissions**: Decarbonizing production facilities, increasing energy efficiency, and aligning with group-level climate targets and science-based pathways (SBTi).;
2. **Water**: Minimizing water withdrawal, optimizing closed-loop cooling systems, and protecting water quality;
3. **Materials/chemicals/waste**: Driving resource efficiency, ensuring hazardous chemical compliance (REACH/RoHS), minimizing industrial waste, and prioritizing material recovery and recycling;
4. **Product use**: Designing high-efficiency cabling solutions that reduce line losses and environmental impacts during operation;
5. **Product end-of-life**: Promoting circular design, eco-design principles, and recyclability of metals and polymers at the end of product life;
6. **Customer Health & Safety**: Guaranteeing product safety, compliance with hazardous substance restrictions, and transparent environmental product declarations across the entire lifecycle.

- Energy Consumption & GHG Emissions

Scope	All Brugg production sites and corporate offices; Scope 1, 2 and Scope 3 emissions.
Governance & responsibility	Accountable function: QHSE. Reduction plans and targets are approved by the Executive Committee and aligned with Terna Group's SBTi-submitted trajectory.

Review & update mechanism	Annual review of the GHG inventory methodology and reduction plan; progress monitored and disclosed annually in sustainability reporting.
Key issues covered	• Energy consumption & GHG emissions

Objectives:

Objective	Type	Indicator (KPI)	Baseline year	Baseline value	Target year	Target value
Reduce absolute scope 1 and 2 GHG emissions 27.1% by 2030 from a 2024 base year (as part of the Terna Group SBTi validated target of 46.2% reduction from a 2019 base year)	*Quantitative*	Reduction of total Scope 1 and 2 GHG emissions vs. 2024 baseline	2024	2'461,7	2030	27.1%
Reduce absolute scope 3 GHG emissions 20.2% by 2030 from a 2024 base year (as part of the Terna Group SBTi validated target of 11.1% reduction from a 2021 base year)	*Quantitative*	Reduction of total Scope 3 GHG emissions vs. 2024 baseline	2024	140'425	2030	20.2%
Maintain and update a formal Scope 1, 2, & 3 governance model and GHG accounting methodology, and define a Scope 1, 2, & 3 emissions reduction plan for 2035, aligned with Terna's SBTi targets	*Qualitative*	-	-	-	-	-
Define a Net-Zero roadmap for 2050 covering Scope 1, 2 and 3 emissions, aligned with Group	*Qualitative*	-	-	-	-	-

SBTi targets (target: 2030)						

- Water

Scope	All Brugg production sites; process and cooling water used in wire extrusion and testing operations, water used in offices and ancillary processes.
Governance & responsibility	Accountable function: QHSE / Operations.
Review & update mechanism	Annual review of water consumption data and reduction measures; corrective actions tracked by site. Progress disclosed annually in sustainability reporting.
Key issues covered	• Water

Objectives:

Objective	Type	Indicator (KPI)	Baseline year	Baseline value	Target year	Target value
Reduce Water consumption through efficiency measures and closed-loop recycling systems across manufacturing lines	*Quantitative*	Reduction of total water consumption vs. 2025 baseline	2025	21'584	2030	10%
Strengthen baseline water consumption metrics across all operations to identify conservation and recycling opportunities.	*Qualitative*	-	-	-	-	-
Implement standardized monitoring, tracking and recording of process water consumption at key operational sites.	*Qualitative*	-	-	-	-	-

- Materials, Chemicals & Waste

Scope	Raw material sourcing (copper, aluminium, polymers), chemical inputs (PVC, silicone), and waste generated across all Brugg manufacturing operations.
Governance & responsibility	Accountable function: QHSE, with Procurement for supplier-side material/chemical data.
Review & update mechanism	Annual review; compliance verified against REACH and RoHS requirements. Progress disclosed annually in sustainability reporting.
Key issues covered	• Materials, Chemicals & Waste

Objectives:

Objective	Type	Indicator (KPI)	Baseline year	Baseline value	Target year	Target value
Reduce waste generation and increase resource circularity	*Quantitative*	Waste recovery rate (%) Waste recycling rate (%)	2025	Recovery 87,5% Recycling 66,4%	2030	Recovery 90% Recycling 75%
Implement a standardized waste management system and reduce waste generation while increasing resource circularity.	*Qualitative*	-	-	-	-	-
Define minimum requirements and progressive targets for recycled content in key raw materials (copper, aluminium, steel) and other materials.	*Qualitative*	-	-	-	-	-

- Product Use

Brugg is committed to minimizing the environmental impact generated by its products during customer use, notably through improved energy efficiency and reduced transmission losses.

Scope	All new cable products developed by Brugg in all its operational sites, from design through to market release.
Governance & responsibility	Accountable function: R&D with QHSE oversight.
Review & update mechanism	Reviewed annually as part of the product development governance process and updated as LCA/EPD coverage expands.
Key issues covered	• Product Use

Objectives:

Objective	Type	Indicator (KPI)	Baseline year	Baseline value	Target year	Target value
Define a roadmap to extend Environmental Product Declaration (EPD) coverage to all cable product portfolio of the relevant markets.	*Quantitative*	% of cable product portfolio covered by Environmental Product Declaration (EPD)	2025	0%	2030	80%
Develop a methodology to quantify avoided emissions generated by products when used by customers.	*Qualitative*	-	-	-	-	-
Embed life cycle assessment (LCA) metrics (e.g. product carbon footprint and use-phase energy losses) into product design and tendering processes, to prioritize lower-impact cable solutions.	*Qualitative*	-	-	-	-	-

- Product End-of-Life

Scope	All Brugg cable products, and associated primary packaging, at end-of-life.

Governance & responsibility	Accountable function: R&D, with QHSE and Procurement (packaging).
Review & update mechanism	Annual review of end-of-life and packaging KPIs; alignment with relevant regulations confirmed annually.
Key issues covered	• Product End-of-Life

Objectives:

Objective	Type	Indicator (KPI)	Baseline year	Baseline value	Target year	Target value
Define a roadmap to extend Environmental Product Declaration (EPD) coverage to all cable product portfolio of the relevant markets.	*Quantitative*	% of cable product portfolio covered by Environmental Production Declaration (EPD)	2025	0%	2030	80%
Enable traceability of key raw materials (e.g. copper, polymers) among the materials portfolio for the LV/MV/HV cable manufacturing, including conflict minerals, through source verification and collection of supporting documentation on origin and recycled content.	*Qualitative*	-	-	-	-	-
Define a sustainable packaging framework, including packaging reduction, reuse and recyclability, covering 100% of product categories by 2030.	*Qualitative*	-	-	-	-	-

- Customer Health & Safety

The company, according to external references (i.e. Ecovadis), classifies Customer Health & Safety within the Environment theme to better capture the connection between the environmental performances of the products and their impacts on customers health and safety during the use phase. To increase the awareness of the company and drive the improvement on Customer Health & Safety, the EPD will be deployed systemically in order to evaluate all the potential impacts the product can have during its lifetime, included the use-phase with final users interactions.

Scope	All Brugg wiring and cable products placed on the market, across all customer segments.
Governance & responsibility	Accountable function: QHSE / Operations.
Review & update mechanism	Annual review by QHSE; updated following any product safety incident or regulatory change.
Key issues covered	• Customer Health & Safety

Objectives:

Objective	Type	Indicator (KPI)	Baseline year	Baseline value	Target year	Target value
Define a roadmap to extend Environmental Product Declaration (EPD) coverage to all cable product portfolio of the relevant markets.	*Quantitative*	% of cable product portfolio covered by Environmental Product Declaration (EPD)	2025	0%	2030	80%
Continuously provide safety guidance to customers.	*Qualitative*	-	-	-	-	-
Monitor product safety during use-phase and assess potential health & safety improvement actions	*Qualitative*	-	-	-	-	-

4.2. Sustainable Procurement Policy

At Brugg Cables, embedding sustainability and ethics into our supply chain is a fundamental prerequisite for driving the global energy transition and creating long-term value, fully aligned with the strategic vision of the Terna Group. We recognize that our environmental and social impact extends beyond our manufacturing plants into our entire supply network. This Sustainable Procurement Policy outlines our commitment to engaging and partnering only with suppliers who share our dedication to responsible business practices. We systematically evaluate and foster supplier environmental practices, ensure strict adherence to supplier social practices and human rights, and enforce robust due diligence to guarantee the responsible sourcing of conflict minerals and critical raw materials. Through continuous supplier monitoring, capacity building, and transparent alignment, we ensure that every link in our value chain upholds the highest ethical, social, and environmental standards.

To systematically implement sustainable procurement across all sourcing activities, Brugg Cables applies a structured lifecycle approach to supplier relationship management:

- **End-to-End ESG Evaluation**: Integrate ESG criteria into every phase of vendor management, from initial self-assessment questionnaires to formal pre-qualification screening, tender evaluations, contractual agreements, and ongoing performance monitoring.
- **Proactive Risk & Performance Screening**: Require prospective and active suppliers to disclose their environmental impacts, human rights policies, and labor conditions during pre-qualification, establishing sustainability performance as a core condition for vendor qualification.
- **Continuous Monitoring & Audit Mechanisms**: Conduct periodic supplier ESG self-assessments, leverage third-party ESG evaluation platforms (such as EcoVadis), and perform targeted risk-based supplier audits to verify compliance and drive continuous improvement across our supply base.

- Supplier Environmental Practices

Scope	All suppliers, with priority focus on raw material suppliers (copper, aluminium, polymers, chemicals).
Governance & responsibility	Accountable function: Procurement, supported by QHSE for technical/environmental criteria.
Review & update mechanism	Annual review by Procurement and QHSE.
Key issues covered	• Supplier Environmental Practices

Objectives:

Objective	Type	Indicator	Baseline	Baseline	Target	Target

		(KPI)	year	value	year	value
Progressively increase the share of recycled content in key raw materials used for LV/MV/HV cable manufacturing (e.g., copper, aluminium and polymers), considering market availability, technical feasibility, and product performance requirements.	*Quantitative*	Weighted average recycled content (%) in conductive metals (Copper and Aluminium wire rod) Recycled content (%) in Polyethylene (PE) used in technically feasible applications	2025	Metals: 31.01% PE: 4.23%	2030	Metals >40% PE >10%
Systematically integrate environmental criteria into every phase of supplier relationship management, from initial self-assessment questionnaires to formal pre-qualification screening and continuous performance monitoring.	*Qualitative*	-	-	-	-	-
Map and assess the presence of PFAS substances within raw materials used across the product portfolio, establishing supplier data collection and monitoring processes.	*Qualitative*	-	-	-	-	-
Improve the GHG Scope 3 emissions calculation accuracy by collecting primary	*Qualitative*	-	-	-	-	-

activity data from suppliers.						

- Supplier Social Practices & Human Rights

Scope	All suppliers and subcontractors, including personnel involved in on-site cable installation.
Governance & responsibility	Accountable function: Procurement, with QHSE and Legal & Compliance support
Review & update mechanism	Annual review by Procurement and QHSE.
Key issues covered	• Supplier Social Practices

Objectives:

Objective	Type	Indicator (KPI)	Baseline year	Baseline value	Target year	Target value
Conduct ESG risk assessments and monitoring activities on key suppliers	*Quantitative*	% of key suppliers assessed for ESG risks	2025	0%	2027	100%
Systematically integrate ESG (including Labour, human rights and DE&I) criteria into every phase of supplier relationship management, from initial self-assessment questionnaires to formal pre-qualification screening and continuous performance monitoring.	*Qualitative*	-	-	-	-	-

Enhance and monitor human rights compliance across the supply chain, leveraging existing codes of conduct, terms, and supplier contracts to drive continuous improvement.	*Qualitative*	-	-	-	-	-
Monitor and ensure the acceptance of all suppliers to Brugg Cables Suppliers Code of Conduct	*Qualitative*	-	-	-	-	-

- Responsible Sourcing of Conflict Minerals

Scope	All suppliers and subcontractors, including personnel involved in on-site cable installation.
Governance & responsibility	Accountable function: Procurement, with QHSE and Legal & Compliance support
Review & update mechanism	Annual review by Procurement and Legal & Compliance.
Key issues covered	• Conflict Minerals

Objectives:

Objective	Type	Indicator (KPI)	Baseline year	Baseline value	Target year	Target value
Establish a structured due diligence approach on conflict minerals, including traceability requirements	*Qualitative*	-	-	-	-	-
Systematically integrate ESG (including Conflict	*Qualitative*	-	-	-	-	-

minerals) criteria into every phase of supplier relationship management, from initial self-assessment questionnaires to formal pre-qualification screening and continuous performance monitoring.						
Require that, if 3TG materials are present in supplied products, suppliers must source exclusively from smelters and refiners certified as conformant with recognized independent audit programs, such as the RMI Responsible Minerals Assurance Process (RMAP).	*Qualitative*	-	-	-	-	-

4.3. Social Policy

At Brugg Cables, our commitment to sustainability and corporate responsibility is deeply rooted in our core values and aligned with the strategic vision of the Terna Group. We believe that our people are our most valuable asset and the cornerstone of our long-term success. The Social Policy outlines our firm commitment to fostering a safe, inclusive, and empowering working environment across our operations and value chain. We are dedicated to ensuring the highest standards of Employee Health & Safety, encouraging continuous growth through dedicated career management and training programs, supporting fair working conditions, and promoting active social dialogue. Furthermore, we actively cultivate Diversity, Equity, and Inclusion (DEI) while upholding an uncompromised zero-tolerance stance against child labor, forced labor, and human trafficking, ensuring that human rights and human dignity are strictly safeguarded at every step.

To ensure the effective execution, oversight, and continuous improvement of our social commitments across all facilities and operational activities, Brugg Cables establishes the following governance framework:

- **ISO 45001 Management System Integration**: Operational health and safety commitments are managed, monitored, and audited under our certified ISO 45001 Occupational Health & Safety Management System, ensuring rigorous risk assessments and continuous safety performance evaluations.
- **Human Rights Due Diligence & Auditing**: Evaluate conducting internal and supply chain risk assessments to identify, prevent, and mitigate potential human rights impacts, guaranteeing compliance with core ILO (International Labour Organization) conventions and international human rights frameworks.
- **Whistleblowing & Grievance Mechanisms**: Provide secure, confidential, and accessible speak-up channels for all employees and external stakeholders to report social, safety, or human rights concerns without fear of retaliation or penalty.

- Employee Health & Safety

Scope	All Brugg employees, across all operational sites.
Governance & responsibility	Accountable function: QHSE.
Objectives / targets	• Ensure the effective application of the Health and Safety Policy • Reduce the Injury rate (Lost Time Injury Frequency Rate, LTFIR, 1000 hours worked) below 10 by 2030 from a 2024 baseline value of 12,17 • Update and enhance the risk assessment framework to strengthen risk identification, evaluation, and management processes. • Reduce occupational injuries; strengthen near-miss management, safety-save reporting (QR-code system) and incident root-cause analysis.
Review & update mechanism	Annual review by QHSE; updated following any product safety incident or regulatory change.
Key issues covered	• Employee Health & Safety

- Working Conditions & Social Dialogue

Scope	All Brugg employees, across all operational sites.
Governance & responsibility	Accountable function: HR.
Objectives / targets	• Guarantee fair compensation, reasonable working hours, and competitive benefits that strictly comply with or exceed local labor laws and industry standards. • Foster a culture of open communication, respecting workers' rights to freedom of association, collective bargaining, and active engagement

	with worker representatives on wages, working conditions and career development. • Ensure that all compensation structures, as defined and covered by the Brugg Cables Salary Policy, not only strictly comply with local legal minimums and collective bargaining agreements, but guarantee a true living wage that enables employees and their families to maintain a decent standard of living through fair, transparent, and equitable pay systems.
Review & update mechanism	Annual review by HR
Key issues covered	• Working Conditions • Social Dialogue

- Career Management & Training

Scope	All Brugg employees, across all operational sites.
Governance & responsibility	Accountable function: HR.
Objectives / targets	• Invest in lifelong learning by providing tailored training programs, skill enhancement opportunities, and technical upskilling aligned with the evolving energy transition. • Maintain structured performance management processes and clear internal progression frameworks to support equitable professional growth and leadership development.
Review & update mechanism	Annual review by HR
Key issues covered	• Career Management & Training

- Diversity, Equity & Inclusion

Scope	All Brugg employees, across all operational sites.
Governance & responsibility	Accountable function: HR, with Legal & Compliance support.
Objectives / targets	• Ensure equal treatment in recruitment, hiring, training, promotion, and compensation regardless of gender, age, ethnicity, nationality, religion, disability, or sexual orientation.

	• Actively cultivate an inclusive workplace culture that values diverse perspectives, eliminates bias, and enforces zero tolerance for discrimination, bullying, or harassment. • Improve the representation of women in management positions, maintaining it at least above 33%.
Review & update mechanism	Annual review by HR
Key issues covered	• Discrimination & Harassment

- Child Labor, Forced Labor & Human Trafficking

Scope	All Brugg own operations and, via the Supplier Code of Conduct, the upstream supply chain.
Governance & responsibility	Accountable function: HR, with Legal & Compliance support.
Objectives / targets	• Maintain and monitor the policy on child labor, forced labor and human trafficking, aligned with ILO fundamental conventions. • Prohibit all forms of child labor, forced or compulsory labor, debt bondage, and human trafficking across all internal operations and facilities. • Enforce strict compliance through rigorous supply chain screening, regular audits, and contractual mandates to ensure third-party partners uphold identical ethical labor standards.
Review & update mechanism	Annual review by HR / Legal & Compliance
Key issues covered	• Child Labor, Forced Labor & Human Trafficking Policy

4.4. Ethics Policy

At Brugg Cables, conducting our business with uncompromising integrity, transparency, and fairness is the foundation of our corporate reputation and long-term success, fully aligned with the ethical standards of the Terna Group. We foster a culture of compliance and accountability where ethical behaviour is non-negotiable across all operational and commercial decisions. This Ethics Policy sets forth our zero-tolerance approach to bribery and corruption, establishes guidelines to prevent and manage conflicts of interest, and mandates strict vigilance against fraud and money laundering in all transactions. Furthermore, we are committed to responsible information management, safeguarding sensitive data, intellectual property, and

privacy with the highest levels of security and confidentiality. Through continuous training, robust governance, and clear reporting channels, we empower every employee and business partner to uphold the highest standards of corporate ethics.

To guarantee strict compliance, independent oversight, and systemic enforcement of business ethics across all internal operations and commercial dealings, Brugg Cables establishes the following governance framework:

- **Ethical Code & Risk Assessments**: The implementation of this policy is driven by the Terna Ethical Code. Brugg Cables performs periodic, business-wide risk assessments covering corruption, fraud, financial compliance, and cybersecurity threats across all operating sites and geographies.
- **Whistleblowing & Speak-Up Mechanisms**: Maintain secure, confidential, and multi-channel whistleblowing procedures (including an anonymous reporting tool) that enable employees and third parties to report suspected misconduct. An annual review of reported cases is conducted, strictly enforcing a zero-tolerance policy against any form of retaliation.
- **Mandatory Training & Awareness**: Ensure 100% employee coverage for ethics, anti-corruption, and cybersecurity awareness training during onboarding and through periodic refresher programs.

- Anti-Corruption & Business Ethics

Scope	All Brugg employees, all business units and geographies; extended to business partners through contractual clauses.
Governance & responsibility	Accountable function: Legal & Compliance.
Objectives / targets	• Ensure the effective application of the Terna Ethical Code, including a bi-annual review of its awareness and compliance. • Conduct periodic corruption risk assessments covering all business units and geographies, assuring targeted training of risk-exposed employees and mandated third parties. • Ensure the effective application of the existing whistleblowing procedures, including an annual review of the reports. • Promote awareness and effective use of internal speak-up channels through training programs, assuring full employee coverage. • Maintain and effectively apply clear rules to prevent conflict of interests to ensure that personal interests or secondary activities never compromise independent business judgment or corporate integrity. • Embed robust internal financial controls and fraud detection mechanisms into business processes to safeguard company assets and financial reporting accuracy.

	• Implement risk-based monitoring of financial transactions and payment structures to detect, prevent, and report unusual or suspicious cash flows and potential money laundering activities.
Review & update mechanism	Annual review by Legal & Compliance
Key issues covered	• Corruption • Conflict of Interest • Fraud • Money Laundering

- Responsible Information Management

Scope	All information systems and data processed by Brugg, including third-party/customer data.
Governance & responsibility	Accountable function: ICT, with Legal & Compliance support.
Objectives / targets	• Conduct annual information security risk assessments, including definition of mitigation measures. • Ensure strict compliance with global data privacy regulations (such as GDPR and Swiss FADP) by embedding Privacy by Design/Default in all systems, managing data subject rights, and conducting regular Data Protection Impact Assessments (DPIAs). • Maintain a robust Information Security Management System (ISMS) to protect the confidentiality, integrity, and availability of critical infrastructure, commercial IP, and employee data against unauthorized access, cyber threats, and data leakage. • Establish clear data classification, retention, and secure disposal protocols for both physical documents and digital assets to prevent unauthorized exposure or retention beyond legal requirements.
Review & update mechanism	Annual review by ICT and Legal & Compliance
Key issues covered	• Responsible Information Management

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