

Corporate Social Responsibility Charter 2026

Scope:

Tresse Métallique J. Forissier S.A.S. (France)
Italtrecce S.r.l. (Italy)
International Wire Polska Sp. z o.o. (Poland)
Special Corde S.r.l. (Italy)
EMS Elektro Metall Schwanenmühle (Germany)
EMS Elektro Metall Spezialprodukte (Poland)

Level:

CSR Charter

Application:

All relevant employees, sites, activities and partners
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Preamble

Creating long-term value is central to our mission. We pursue it while upholding our ethical values and supporting the well-being and professional development of our employees. To achieve this, we have established organizational processes and assigned clear responsibilities.

Our economic and management objectives are pursued with respect for all our stakeholders – employees, customers, suppliers, shareholders and the communities in which we operate – and with particular care for health, safety and the environment. As an international, multi-sector group in the field of electrical connectivity, while remaining firmly rooted in our local communities, the Group seeks, through its responsible development strategy, to uphold the following fundamental principles:

- Respect for human dignity and compliance with the laws and regulations governing labor rights;
- Sustainable development and environmental protection;
- Corporate integrity

These principles apply wherever we operate and whoever the stakeholders we deal with. The Group requires the same level of commitment from its customers, suppliers and subcontractors on all matters set out in this Charter.

Reference Frameworks

This Charter is guided by the following international standards:

- the UN Guiding Principles on Business and Human Rights (UNGPs) and the Universal Declaration of Human Rights;
- the ILO Declaration on Fundamental Principles and Rights at Work (1998, as amended in 2022) and the ILO core conventions;
- the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals;
- the Ten Principles of the UN Global Compact.

The Group implements this approach through an environmental policy and an environmental management system compliant with the DIN EN ISO 14001 standard, as well as the certification of the Tresse Métallique J. Forissier S.A.S. (France), Italtrecce S.r.l. (Italy), and Special Corde S.r.l. (Italy) sites.

1. Respect for Human Dignity

1.1 Human Rights and Due Diligence

The Group respects internationally recognized human rights and the ILO Declaration on Fundamental Principles and Rights at Work, and opposes all forms of modern slavery, human trafficking and forced or compulsory labour. We identify, prevent and mitigate the actual and potential adverse impacts of our activities and supply chain on people, through a risk-based due diligence process that is reviewed at least annually. Where we have caused or contributed to an adverse impact, we are committed to providing or cooperating in appropriate remediation.

1.2 Child Labour and Young Workers

The Group does not employ children and does not work with suppliers or subcontractors that use child labour. The minimum age for employment is 16 years, or the local legal minimum age if higher, except for work performed as part of a lawful internship or apprenticeship program. Workers under 18 years of age shall not perform hazardous work or night work.

1.3 Forced Labour and Undeclared Work

All work must be voluntary. The Group prohibits forced, bonded, compulsory or undeclared work. Workers must be free to leave their employment with reasonable notice, must not be required to surrender identity documents, and must not be charged recruitment fees or related costs.

1.4 Employees, Diversity and Non-Discrimination

The Group is committed to valuing and promoting diversity among candidates and teams, giving everyone the opportunity to join us and to develop through their skills, commitment, initiative and team spirit.

We do not tolerate any direct or indirect discrimination in recruitment, pay, training, promotion, discipline or termination, in particular on the grounds of sex, gender identity, sexual orientation, age, race, ethnic or national origin, religion or belief, disability, health status, pregnancy or maternity, marital or family status, political opinion, trade union membership or any other characteristic protected by law.

We support the return to work of people who have been away from employment and promote access to jobs for people with disabilities. We believe that differences enrich our teams and that the Group's international presence fosters cultural diversity and career opportunities. Because every employee brings added value and our strength lies in preserving our know-how, we invest in our human capital. We provide training at all levels of the organization, so that our employees have the skills required to perform their duties effectively and to excel in our field. Our approach is simple: recruit, train and support a wide range of profiles, while ensuring gender equality, including equal pay for work of equal value.

The pressure to achieve economic objectives must never lead anyone to disregard rules or to adopt behaviors or practices that are contrary to ethics, health or the physical and moral integrity of individuals.

Violence, harassment (including sexual and moral harassment) and bullying in the workplace are unacceptable. They are addressed through documented procedures and can be reported through the channels described in Section 5.

We expect everyone to act in line with the Group's values:

- Team spirit
- Ethics
- Know-how
- Innovation

We are committed to fostering among all employees:

- the Groups organisational culture
- awareness of economic performance
- professional individual and collective behavior
- everyone's involvement in the company's activities.

1.5 Health and Safety

We consider a healthy and safe working environment to be a fundamental right of every worker, as recognized by the ILO since 2022. Safety performance relies on both individual and collective responsibility, as we believe that all accidents can be prevented.

The health and safety of our employees, temporary workers, contractors and visitors are a priority in all our activities. We are committed to preventing occupational risks, maintaining ergonomically appropriate working conditions and complying with applicable regulations.

We ensure that people are informed and trained, that hazardous situations are identified and reduced, and that a culture of prevention and vigilance is promoted. Every worker has the right to stop, or refuse work they reasonably believe to be dangerous, without fear of reprisal, and is encouraged to report hazardous situations so that corrective actions can be implemented promptly.

The Group implements these commitments through a Health, Safety and Hygiene Policy, with annual objectives and indicators (e.g. accident frequency and severity rates).

1.6 Working Conditions and Social Dialogue

To support a healthy balance between professional and personal life, working time is organized in compliance with working hours, rest periods and public holidays. Flexible working arrangements are taken into account and are granted according to the employee's seniority and level of autonomy in their role.

Working hours comply with local law and collective agreements. Overtime is voluntary, compensated in accordance with the law and must not be excessive; employees are entitled to at least one day off in every seven.

Wages and benefits comply at a minimum with the legal requirements and applicable collective agreements of each country. We aim to pay a wage that allows workers to meet their basic needs. Wage deductions as a disciplinary measure are not permitted.

The Group fosters social dialogue and collective bargaining, and respects employees' freedom of expression and freedom of association, including the right to join or not to join a trade union. Because dialogue is essential, we listen to our employees and foster engagement through HSE and quality of working life (QWL) initiatives, recognizing that performance and motivation are linked to a positive social climate.

2. Sustainable Development and Environmental Protection

2.1 Environmental Management

At a time of major climate change and increasing pressure on natural environments, sustainable development and environmental protection through responsible design are more than a commitment: they are a necessity, a strategic factor for our business and a key element in strengthening the market position of our products.

Our approach integrates environmental considerations into our decisions, activities, and relationships with our partners, based on the principles of prevention, compliance, continuous improvement, and shared responsibility. The Group implements this approach through an environmental policy and an environmental management system compliant with the DIN EN ISO 14001 standard, as well as the certification of the Tresse Métallique J. Forissier S.A.S. (France), Italtrecce S.r.l. (Italy), and Special Corde S.r.l. (Italy) sites.

2.2 Climate and Energy

We measure our greenhouse gas emissions (Scopes 1, 2 and, progressively, 3) and are committed to reducing them. Our target is to reduce Scope 1 and 2 emissions by 20% by 2030 compared with 2024 in particular through energy efficiency and the use of renewable energy.

2.3 Resources, Circularity and Waste

We use raw materials, energy and water efficiently. We promote the circular economy, in particular by increasing the recycled content of copper and other metals, recovering production scrap and reducing packaging, including single-use plastics. We reduce, sort and recover waste, and dispose of hazardous waste through authorized channels.

2.4 Product Compliance and Responsible Sourcing of Minerals

We comply with applicable European and international regulations, particularly REACH, RoHS, and, when applicable, the Corporate Sustainability Due Diligence Directive (CSDDD), with a focus on continuous improvement.

We source the minerals used in our products responsibly, in line with the OECD Due Diligence Guidance and, where applicable, Regulation (EU) 2017/821 on conflict minerals. We refuse to source from suppliers suspected of contributing to the financing of armed conflict or to human rights abuses, and we expect our suppliers to do the same and to provide the relevant information using the RMI templates (CMRT, EMRT).

3. Corporate Integrity

3.1 Anti-Corruption and Extortion

The Group has zero tolerance for corruption in any form, active or passive, public or private, whether committed directly or through third parties. No employee or person acting on our behalf may:

- offer, promise, give, solicit or accept any undue advantage in order to obtain or retain business or to influence a decision;
- make facilitation payments, even if small or customary locally;
- coerce, threaten, manipulate or deceive any third party, including in connection with an audit, an inspection or the signing of a contract (extortion);
- use agents, intermediaries or consultants to do what they are not allowed to do themselves.

Intermediaries and other higher-risk business partners are subject to appropriate integrity checks before being engaged.

3.2 Gifts and Hospitality

Gifts, invitations, and other benefits may be offered or accepted only if they are modest, occasional, transparent, and not likely to influence—or give the impression of influencing—impartiality. Any gift or invitation valued at more than €50 per year by business partner must be approved in advance by the finance department and the manager and then recorded in a register. Cash or cash equivalents are not permitted under any circumstances.

3.3 Conflicts of Interest

The personal interests of employees and the interests of the Group must be kept strictly separate. Personal relationships or interests must not affect business relationships with customers, suppliers or any other partner. Any actual or potential conflict of interest must be disclosed in advance to the employee's line manager, so that it can be managed appropriately.

3.4 Fair Competition and Trade Compliance

The Group competes fairly and complies with competition law: we do not agree with competitors on prices, markets or customers, and we do not exchange commercially sensitive information with them. We also comply with applicable export control, customs and international sanctions regulations, and with anti-money-laundering rules.

3.5 Data Protection and Confidentiality

The Group protects the confidential information of its employees and business partners and honors any confidentiality agreement entered into with its stakeholders. This includes, without limitation, personal data, industrial property rights, project information, manufacturing process data and all commercial information. Personal data is processed lawfully, only for legitimate business purposes and in compliance with the EU General Data Protection Regulation (GDPR) and applicable local law. Confidential information may not be disclosed without authorization. We apply appropriate information security and cybersecurity measures.

3.6 Responsible Taxpayer

The Group pays all taxes, duties and levies owed in the countries where it operates, whether on a permanent or occasional basis, and does not engage in artificial arrangements aimed at tax avoidance.

3.7 Shareholders and Accurate Records

We honor the commitments we have made to our shareholders and to one another, and we take responsibility for our actions and results in a spirit of continuous improvement. Our books, records and reports are accurate, complete and prepared in accordance with applicable accounting rules.

4. Business Partners

The Group expects its suppliers, subcontractors and other business partners to comply with principles equivalent to those of this Charter and to apply them within their own supply chains. These requirements are set out in our Supplier Code of Conduct / General Conditions of Purchase.

We assess our suppliers on a risk basis, for example through self-assessment questionnaires, independent sustainability ratings (e.g. EcoVadis) and audits. Serious or persistent breaches that are not remedied may lead to the suspension or termination of the business relationship.

5. Speaking Up and Non-Retaliation

Any person, whether an employee, temporary worker, former employee, job applicant, supplier, customer, or any other third party—may report, in good faith, any actual or suspected violation of this Charter, the law, or our policies.

Reports may be submitted to a supervisor or the Human Resources department. Each company manages its reporting channel in accordance with the European Whistleblower Directive (EU) 2019/1937 as transposed into national law (notably Legislative Decree 24/2023 in Italy, the Sapin II and Wasserman laws in France, as well as the Act of June 14, 2024, on the Protection of Whistleblowers in Poland and the Whistleblower Protection Act (HinSchG) in Germany).

All reports are handled confidentially, impartially, and within the statutory timeframes. The Group prohibits any form of retaliation against anyone who reports an issue in good faith or who cooperates with an investigation.

6. Implementation, Monitoring and Review

General Management is responsible for this Charter. The HSE-CSR Department coordinates its implementation with Human Resources, Purchasing, Quality and the local management of each company. This charter will be communicated to all employees and business partners and published on our website. Employees will receive appropriate training, particularly on the topics of anti-corruption, health and safety, and reporting misconduct.

Breaches of this Charter may lead to disciplinary measures in accordance with applicable law and collective agreements. Progress is monitored through key indicators (e.g. safety, greenhouse gas emissions, training hours, reports received and handled, supplier assessments) and reported annually. This Charter is reviewed at least every two years, or earlier if required by legal or organizational changes.

Séverine Planche (HSE-CSR Director, International Wire Europe)

Alfredo Gambini (President, International Wire Europe)

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