SUPPLIER CODE OF CONDUCT OF CABLES DE COMUNICACIONES ZARAGOZA, S.L.

1. PURPOSE

This Supplier Code of Conduct sets out the minimum ethical, social, labour and environmental principles and requirements that suppliers and business partners of Cables de Comunicaciones Zaragoza, S.L. (hereinafter, "Cablescom") must comply with during their business relationships with the company.

Cablescom considers a responsible supply chain to be a fundamental element in the organisation's sustainable development. Accordingly, it expects its suppliers to conduct their activities responsibly, in compliance with applicable legislation and the principles set out in this Code.

The purpose of this document is to establish clear and consistent expectations for Cablescom suppliers and to promote the continuous improvement of their performance in sustainability, social responsibility and business ethics.

2. SCOPE

This Code applies to Cablescom suppliers of goods and services, including, where applicable, manufacturers, distributors, subcontractors and other business partners involved in supplying products or providing services to the company.

Cablescom also expects its suppliers to promote equivalent principles among their own suppliers and subcontractors, particularly where these may have a significant influence on the social, environmental or ethical aspects associated with the supply provided to Cablescom.

This Code provides a reference framework for the selection, approval, evaluation and management of Cablescom suppliers, considering the nature and risk level of each business relationship.

3. COMPLIANCE WITH LEGISLATION

Suppliers shall comply with all laws, regulations and legal requirements applicable to their activities, including those relating to:

- Labour rights and human rights.
- Occupational health and safety.
- The environment.
- Prevention of corruption and bribery.
- Competition.
- Data and information protection.
- Waste and chemical management.
- Working conditions.
- Taxation and applicable administrative obligations.

Where the requirements set out in this Code are more stringent than the applicable local legislation, suppliers are expected to take reasonable measures to comply with the principles established in this document.

4. HUMAN RIGHTS AND LABOUR PRACTICES

Cablescom expects its suppliers to respect internationally recognised human rights and provide decent and respectful working conditions.

4.1. Forced Labour

Suppliers shall not use any form of forced or compulsory labour, modern slavery, servitude or human trafficking.

Workers shall be free to leave their jobs in accordance with applicable legislation and shall not be subjected to threats, coercion or undue restrictions.

4.2. Child Labour

Suppliers shall not employ anyone below the legal minimum working age.

They shall also comply with the applicable legal provisions concerning the protection of young workers and minors.

4.3. Non-Discrimination and Equal Opportunities

Suppliers shall provide a working environment based on respect and equal opportunities.

Discrimination on grounds protected by applicable legislation shall not be tolerated, including, but not limited to, sex, age, disability, origin, nationality, social status, sexual orientation, religion or any other personal characteristic.

4.4. Harassment and Dignified Treatment

Suppliers shall promote a working environment in which the dignity of individuals is respected.

Harassment, intimidation, violence, physical or psychological abuse, or any other form of degrading treatment shall not be tolerated.

4.5. Freedom of Association and Collective Bargaining

Suppliers shall respect workers' rights relating to freedom of association, representation and collective bargaining, within the framework of applicable law.

Workers shall not suffer retaliation for legitimately exercising these rights.

4.6. Working Hours and Remuneration

Suppliers shall comply with applicable legislation on working hours, rest periods, holidays and overtime.

They shall also provide remuneration in accordance with applicable legal requirements and fulfil their obligations relating to wages, benefits and social security contributions.

5. OCCUPATIONAL HEALTH AND SAFETY

Suppliers shall provide a safe and healthy working environment and take the measures necessary to prevent accidents, injuries and occupational risks.

Among other measures, suppliers are expected to:

- Identify and manage risks associated with their activities.
- Provide appropriate personal protective equipment where necessary.
- Provide workers with appropriate training and information.
- Maintain facilities and equipment in safe condition.

- Comply with applicable occupational risk prevention legislation.
- Have appropriate procedures in place to respond to emergencies.

Cablescom considers the prevention of accidents and the protection of the health of workers involved in its supply chain to be particularly important.

6. THE ENVIRONMENT

Cablescom expects its suppliers to conduct their activities in an environmentally responsible manner and to comply with applicable environmental legislation.

Suppliers shall take reasonable measures to prevent and reduce the environmental impacts arising from their activities.

6.1. Waste Management

Suppliers shall properly manage the waste generated by their activities, prioritising the following options, where technically and economically feasible:

- Waste prevention.
- Reduction.
- Reuse.
- Recycling and recovery.
- Appropriate disposal as a last resort.

Waste shall be managed in accordance with applicable legislation.

6.2. Efficient Use of Resources

Suppliers are expected to promote the efficient use of natural resources, raw materials, water and energy.

They are also encouraged to adopt measures aimed at reducing unnecessary consumption and improving the efficiency of their processes.

6.3. Energy and Emissions

Suppliers shall comply with applicable legislation on emissions and pollution.

Cablescom encourages its suppliers to identify and progressively reduce their greenhouse gas emissions and improve their energy efficiency.

Where possible, suppliers are encouraged to set emissions reduction targets and implement corresponding measures.

6.4. Pollution Prevention

Suppliers shall take reasonable measures to prevent air, water and soil pollution arising from their operations.
They shall hold the environmental permits and authorisations legally required for their activities.

6.5. Hazardous Substances and Chemicals

Suppliers shall appropriately manage the chemicals and hazardous materials used in their activities and comply with applicable legal requirements.

Where relevant, they shall provide Cablescom with the necessary information on the composition and hazards of the products supplied, as well as the requirements for their handling.

6.6. Climate Change and Environmental Improvement

Cablescom encourages its suppliers to identify the main environmental impacts associated with their activities and establish improvement measures.

The existence of environmental management systems, environmental certifications, emissions reduction targets, energy efficiency initiatives and other verifiable environmental improvement measures will be viewed favourably.

6.7. Land Protection and Land Rights

Cablescom is committed to respecting the property, tenure and legitimate use rights over land, forests and water resources of local communities, Indigenous Peoples and other persons affected by its business activities or those of its suppliers. The Company rejects all forms of illegal or illegitimate land acquisition (land grabbing) and will ensure that legitimate rights over natural resources are not infringed.

7. BUSINESS ETHICS

Cablescom expects its suppliers to conduct their business activities with integrity, transparency and responsibility.

7.1. Anti-Corruption and Bribery

Suppliers shall comply with applicable legislation on the prevention of corruption and bribery.

They shall not offer, promise, authorise, request or accept undue advantages intended to influence a business decision.

7.2. Conflicts of Interest

Suppliers shall avoid situations that could give rise to conflicts of interest in their dealings with Cablescom.

Any situation that may constitute an actual or potential conflict of interest shall be disclosed to Cablescom transparently.

7.3. Gifts, Invitations and Hospitality

Suppliers shall refrain from offering gifts, invitations, payments or other forms of hospitality that may influence, or could reasonably be perceived as intended to influence, purchasing decisions or the business relationship with Cablescom.

7.4. Fair Competition

Suppliers shall conduct their activities in compliance with applicable competition rules and avoid anti-competitive practices.

7.5. Information and Confidentiality

Suppliers shall protect the confidential information provided by Cablescom and use it exclusively for the purposes for which it was supplied.

They shall also take reasonable measures to prevent unauthorised access to, use of or disclosure of such information.

8. RESPONSIBLE SUPPLY CHAIN

Cablescom recognises that social and environmental impacts may occur at different levels of the supply chain.

Suppliers are therefore expected to:

- Communicate social and environmental responsibility principles to their own suppliers where relevant.
- Identify and manage the social, environmental and ethical risks associated with their supply chain.
- Promote compliance with principles equivalent to those set out in this Code among their suppliers and subcontractors.
- Provide, where reasonably possible, information relating to the origin and characteristics of the products supplied.

For certain purchasing categories, or where a significant risk has been identified, Cablescom may request additional information from the supplier about its supply chain.

9. PRODUCT QUALITY, SAFETY AND RESPONSIBILITY

Suppliers shall ensure that the products and services supplied to Cablescom comply with the applicable specifications, legal requirements and contractual conditions.

Where relevant, they shall provide appropriate information on:

- Technical characteristics.
- Legal and regulatory requirements.
- Product safety.
- Composition and materials.
- Restricted substances.
- Applicable environmental requirements.

Suppliers shall inform Cablescom of any circumstance that may significantly affect the quality, safety, legal compliance or sustainability of the products or services supplied.

10. COMMUNICATION AND ACCEPTANCE OF THE CODE

Cablescom shall communicate this Code to the suppliers to whom it applies, in accordance with the criteria established by the Purchasing Department.
Suppliers may be required to:

- Confirm receipt of the Code.
- Declare their commitment to the principles set out therein.
- Provide information or documentation enabling verification of compliance with specific requirements.
- Report any significant non-compliance identified.

Acceptance of the Code may be formalised by means of a declaration of adherence, signature of the document itself, electronic acceptance or any other mechanism established by Cablescom.

Cablescom shall maintain appropriate records of the communication and acceptance of the Code by suppliers, in accordance with its internal procedures.

11. MONITORING AND VERIFICATION

Cablescom may monitor compliance with the principles set out in this Code using different mechanisms, depending on the level of risk and the nature of the business relationship, including:

- Sustainability questionnaires.

- Supplier assessments.
- Requests for documentation or evidence.
- Review of certifications.
- Information provided directly by the supplier.
- Performance indicators.
- Other assessment tools deemed appropriate by Cablescom.

Suppliers shall cooperate in good faith with reasonable requests for information relating to the aspects covered by this Supplier Code of Conduct.

The scope and frequency of monitoring may vary depending on factors such as supplier criticality, the type of product or service, the associated risk and the potential impact on the supply chain.

12. NON-COMPLIANCE AND CORRECTIVE ACTIONS

Where Cablescom becomes aware of a significant breach of the principles set out in this Code, it may request additional information from the supplier and, where appropriate, a corrective action plan.

Where appropriate, corrective actions shall specify:

- The non-compliance identified.
- The cause of the non-compliance.
- The corrective measures planned.
- The person responsible for implementation.
- The planned implementation deadline.
- Evidence that the action has been closed.

Cablescom shall promote the improvement and rectification of non-compliances whenever reasonably possible.

However, serious or repeated breaches, particularly those relating to human rights, forced labour, child labour, corruption, safety or serious environmental damage, may be taken into account in decisions concerning the continuation of the business relationship, in accordance with the applicable contracts and internal procedures.

13. TRANSPARENCY AND REPORTING OF INCIDENTS

Suppliers shall notify Cablescom of any circumstance of which they become aware that may constitute a serious breach of the principles set out in this Code and may significantly affect the business relationship or Cablescom's supply chain.

Cablescom encourages suppliers to have appropriate mechanisms in place to enable their workers to responsibly report potential legal, ethical, labour or environmental breaches.

Reports made in good faith shall be handled responsibly and without retaliation contrary to applicable legislation.

14. CONTINUOUS IMPROVEMENT

Cablescom considers supply chain sustainability to be a process of continuous improvement.

Suppliers are therefore encouraged to:

- Set environmental and social improvement targets.
- Measure and review their performance.
- Implement management systems where appropriate.
- Train their workers on relevant matters.
- Reduce their environmental impacts.
- Improve working conditions.
- Promote responsible business practices.
- Share sustainability initiatives and good practices with Cablescom.

Cablescom may view these initiatives favourably in its supplier assessment and development processes.

15. RESPONSIBILITIES OF CABLES DE COMUNICACIONES ZARAGOZA, S.L.

Cablescom is committed to promoting a responsible and transparent relationship with its suppliers. In this context, the company will endeavour to:

- Communicate its sustainability expectations to suppliers.
- Promote social, environmental and ethical criteria in supplier management.
- Provide appropriate information on applicable requirements.
- Promote continuous improvement throughout the supply chain.
- Handle information provided by suppliers responsibly.
- Assess sustainability aspects in accordance with the nature and risk level of each business relationship.

16. SUPPLIER DECLARATION

The supplier declares that it has received and understood this Supplier Code of Conduct of Cables de Comunicaciones Zaragoza, S.L.

The supplier undertakes to comply with the principles and requirements set out in this document and to promote equivalent principles within its own supply chain where applicable.

The supplier also undertakes to cooperate with Cablescom in responding to reasonable requests for information or documentation relating to the aspects covered by this Code.

Acceptance of this Code does not replace the obligations established in contracts, purchase orders, technical specifications or applicable legal requirements, all of which shall remain fully enforceable.

17. DOCUMENT CONTROL AND REVIEW

This Code shall be reviewed periodically by the Purchasing Department and may be updated whenever significant changes occur in:

- Applicable legislation.
- Customer requirements.
- Stakeholder expectations.
- Supply chain risks.
- Cablescom's internal policies.
- The company's sustainability objectives.
- Best practices in sustainable procurement.

Significant amendments shall be communicated to suppliers where appropriate.

May 2026

Qiang Wang
Chairman of the Board of Directors
Zaragoza, May 2026

Cables de Comunicaciones Zaragoza, S.L.