



# Nexans Code of Ethics and Business Conduct



# Summary

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*The companies in which the Company Nexans directly or indirectly owns investments are separate entities. In this publication, the expressions 'Nexans', 'Group' and 'Nexans Group' are sometimes used for convenience where references are made to Nexans companies in general. Likewise, the words 'we', 'us' and 'our' are also used to refer to Nexans companies in general or those who work for them. These expressions are also used where there is no purpose in identifying specific companies*

# CEO STATEMENT

## ON NEXANS' CODE OF ETHICS AND BUSINESS CONDUCT



While operating in many different countries, Nexans Group shares and upholds the same core values in the way it conducts its businesses around the world, with the highest levels and standards of safety, integrity, respect and value of the environment and of the people, customers, business partners and all our stakeholders.

Over the past years, in an ever more complex, fast-changing and highly regulated global business we operate in, we have reinforced our policies and processes in governance, ethics and compliance. Our commitment to excellence and integrity in the way we conduct our businesses is indispensable to secure Nexans' success and sustainable growth. Irrespective of our activity or our position in the Group, it is not only what we do – but how we do it – that wins the trust of our colleagues, customers, partners and all our stakeholders.

Nexans Code of Ethics and Business Conduct must be our guide and reference for applying our ethical standards and core values. This guide and its proper and effective implementation is also a reference for our client's choice.

Compliance with the Nexans Code of Ethics is everyone's responsibility and interest and there will be no tolerance for any violation. If you have any doubt or questions about what constitutes appropriate conduct, promptly discuss the issue with your manager or one of the contacts made available to you within the Group prior to acting.

You can count on me and the Management Board as we count on each of you to comply with this Code, to share and communicate our ethical rules and commitments which underpin Nexans' reputation and success.

**Christopher GUERIN**  
CHIEF EXECUTIVE OFFICER





# An everyday guide



The Nexans Code of Ethics and Business Conduct establishes the business principles applicable to all Group's employees. The rules and guidelines it contains are the boundaries within which every Nexans employee must adhere and operate every day. This Code sets practical guidelines which supplement the rules, procedures and standards defined in your countries which remain applicable.

## Compliance with laws: an absolute obligation



Compliance with the laws and regulations of the countries in which the Group operates is an obligation bearing no exception.

Any breach of the Code may trigger disciplinary sanctions and, in some cases, legal consequences such as fines and imprisonment.

The Nexans Code of Ethics and Business Conduct is designed to provide practical assistance and help us resolve the issues and dilemmas we can face in our work. How should certain customer or supplier requests be handled? How should we behave with our colleagues? As an employee of Nexans you also have a responsibility to accept personal invitations to training on topics highlighted in this Code.

The table of contents provides a quick way to find the subjects which are covered.

That being said, it is not possible to address every single situation that could occur. If you are confronted with an issue of ethical or business conduct, ask yourself the following questions:

- *Is it legal?*
- *Does it comply with the Nexans' Code of Ethics and Business Conduct?*
- *Am I certain of the appropriate conduct to be taken?*
- *Do I feel like I am making the right decision?*
- *What might people think if this became public?*

When in doubt, each of use must express his or her concerns and can seek advice. Several contact people are available to help you (see page 44).

### If you are a manager, you have more responsibilities, because:

- You set the tone, govern by example and promote ethical conduct.
- As a decision-maker you are confronted with matters that can be complex.
- Your team will come to you for assistance and advice, and you must be able to respond accordingly.

Potential disciplinary sanctions for breach of ethics and compliance obligations:

- warning / formal notice
- disciplinary layoff
- disciplinary transfer
- demotion / downgrading / rank reduction
- dismissal / termination
- dismissal without termination indemnities



# Human Rights Charter



Nexans is committed to respect human rights as set out in the UN Universal Declaration of Human Rights and has adopted the following Human Rights Charter to materialize this commitment.

This first Human Right Charter aims to provide guidelines of Nexans' policies and actions in terms of respect for human rights, an area in which the Group has been engaged for several years. This document is part of the Nexans Code of Ethics. Respect for all human beings, their diversity, dignity and safety are at the heart of Nexans values. This is what the Group wishes to illustrate through this Charter, which provides an overview of the principles that Nexans applies all along its value chain and within the communities in which it is present. In addition, the Group encourages all suppliers its works with to enforce the policy.

Our policy embraces and complies with global treaties such as the International Bill of Human Rights, the Universal Declaration of Human Rights and the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work and other ILO Standards. Nexans is a multi-national company, based in France where diligence on these topics is a legal obligation. The Nexans Human Rights Charter complies with the laws and regulations of all the countries in which the Group operates unless these laws and regulations are substandard to Nexans' commitments under international framework agreements, the Nexans Code of Ethics, other company policies and procedures and the minimum standards afforded by this Charter.

In addition, Nexans is a signatory of the United Nations Global Compact since December 2008. Since joining this initiative, our Group has made a commitment to support and implement ten fundamental principles in the areas of human rights and labour standards, within its sphere of influence.

## Human Right Policy Governance

The Human Rights charter is included in the Nexans Code of Ethics and its application is followed up every semester by the Governance & Social Committee, chaired jointly by the General Counsel and the Chief Human Resources Officer.

The Group's Code of Ethics (including this Human Rights Charter) is presented to every new employee upon joining Nexans. It is also displayed on the Intranet sites of CSR, Human Resources and Purchasing departments, and news / updates are relayed via the internal social media tool.





# 1. GLOBAL LABOUR STANDARDS



## A. LEGAL EMPLOYMENT

- The Human Resources function are responsible for the employment process.
- All Nexans employees receive an employment offer before they start working for the Group, with details on the job they are to perform, salary conditions and reference to reasonable notice periods.
- Each employee has access to information about their rights and obligations according to local legislation. Each member of the HR team and/or social partners are committed to support employees in order to obtain this information.
- When applicable under governmental regulations, employees in the Group are issued a work certificate when leaving the Company.



## B. CHILD LABOUR & YOUNG WORKERS

The Group ensures compliance with the legal working age set by local legislation and does not employ children under the age of 16. Apprenticeships may be carried out from the age of 16 respecting local legislation, as this professional experience is a pre-requisite for their education on condition that the health, safety and morals of the young persons concerned are fully protected and that the young persons have received adequate specific instruction or vocational training in the relevant branch of activity" (article 3) – Minimum Age Convention: [link](#)



## C. ELIMINATION OF ANY FORM OF FORCED OR BONDED LABOR

Nexans ensures the elimination of forced or bonded labour, prison labour and trafficking in persons within its direct and indirect operations. Nexans does not employ workers agencies or firms involved in human trafficking, child labour or bonded labour through agencies or firms involved in human trafficking, child labour or bonded labour.



#### D. SAFEGUARD OF FAIR REMUNERATION RIGHTS

- Nexans guarantees the minimum wages set by local legislation and ensures regular payment to the employee.
- Nexans abides by all local hiring a remuneration legislation and strives to ensure fair and equitable employment practices for all employees, at all hierarchical levels in the Group.



#### E. PROMOTING FAIR RECRUITMENT

- Recruitment in Nexans replies to a labour market need, and does not serve as a means to displace or diminish an existing workforce, to lower labour standards, wages, or working conditions or to otherwise undermine decent work.
- Nexans has a Diversity & Inclusion policy which upholds fairness and non-discrimination in all people processes, including recruitment.



#### F. TRAINING AND DEVELOPMENT

In order to develop the potential of each employee and to share best practices, Nexans wants to provide its employees with access throughout their career to the training necessary for them to be able to perform their job properly and to ensure their Employability.

## 2. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

Nexans wishes to develop constructive relations with its employees and their representatives. We respect the right of employees to freely express themselves, form or join the unions and workers organizations of their choice and to participate in collective negotiations. We recognize the role and responsibilities of our employee representatives and are committed to communicating, negotiating and bargaining collectively with them to address matters of collective interest.





## 3. WORK CONDITIONS



### A. WORKING CONDITIONS AND HOURS OF WORK

- The Group complies with local legislation on hours of work and ensures all employees have at least one day of rest per week and that break times are provided during the working day, and that the rate of pay for overtime is respected.
- The Group grants paid leave, sick leave and parental leave in accordance with local legislation.



### B. SECURITY

The Group does its utmost to ensure and provide safe and secure working conditions in the workplace for employees, and also takes into account the external security environment and employees who travel provided that security concerns are not discriminatory.



### C. HARASSMENT

- Nexans is committed to creating and maintain a work environment in which people (employees and third parties) are treated with dignity, decency and respect. We aim to for an environment characterized by mutual trust and the absence of intimidation, oppression, exploitation or harassment.
- The Group takes any form of harassment very seriously and has a zero-tolerance policy towards any form of harassment, violence or intimidation against our employees by their peers, supervisors, customers or vendors.
- A whistle blowing system is in place allowing employees to anonymously alert any improper behavior or conduct.
- Nexans promptly investigates all complaints of harassment and ensures swift and appropriate measures when applicable, and training where necessary.
- Nexans prohibits retaliation to an employee who reports or files a complaint of discrimination or harassment.



### D. HEALTH & SAFETY

- Nexans is committed to guaranteeing the safety of any person on site. Safety at work is based not only on the technical reliability of the facilities and equipment, but also on employee training and the strength of the Group's Health & Safety culture. Nexans is committed to providing a safe working environment with limited risk.
- We must all comply with the hygiene, health and safety rules, and help our colleagues, service providers, or any person on site to do the same.
- We are attentive to safety problems and ensure that our actions do not result in any risk for others or for ourselves.
- Safety is an absolute priority for Nexans. Regardless of the degree of urgency, safety comes first.
- Give workers representatives adequate information on measures taken by the employer to secure occupational safety and health.

# 4. EQUAL OPPORTUNITIES



## A. NON-DISCRIMINATION RIGHT

- Nexans is committed to creating an environment that guarantees equal opportunities for all forming a workplace where equality, respect and consideration for one another are the norm.
- Our decisions, in terms of attraction, recruitment, development, compensation, termination and working relationship are made to prevent discrimination, on the bases of (included but not limited to) race, color, ethnicity, gender, origin, sexual preferences, age, disability, health condition, pregnancy, religion, marital status, or the civil, social or political characteristics of the employee.



## B. DIVERSITY & INCLUSION

At Nexans, we recognize all the differences that make each employee valuable and unique. This diversity of experience, origin, personality, gender and disability are considered key to our global ambition to lead the world in energy transition towards a sustainable planet. We strive for an inclusive work environment where everyone can engage, speak up, flourish, and therefore contribute to our business results.

Our main Diversity & Inclusion commitment is to reach a level of gender equality that truly represents the diversities of our customers, suppliers and communities in which we serve.

We expect all employees to know and respect our Diversity & Inclusion policy, published in March 2021.

A young child with brown hair, wearing a dark blue jacket with yellow and green accents, stands in a field of yellow flowers. The child is holding two colorful pinwheels, one blue and one yellow. In the background, several large white wind turbines are visible against a clear blue sky.

## 5. LOCAL COMMUNITIES

Our responsibility is to be involved in communities:

- Nexans is committed to respect the cultures, customs and values of the people in the communities in which it operates, as long as it does not conflict with our Code of Ethics.
- Nexans, through its operations, contributes to the social and economic development in countries where it operates and pays particular attention to development opportunities for local communities.
- Through the Nexans Foundation and local sponsorship, Nexans supports the access to energy for under-privileged populations.
- Nexans also respects the rights of communities by identifying, preventing and mitigating impact to the local environment and way of life.
- Nexans seeks to establish regular dialogue and lasting relationships with these communities.



## 6. DATA PRIVACY

As set out in Nexans Data Protection Policy, Nexans is committed to protect the personal data of our employees and business partners. Privacy is not for sale, it's an asset to protect. It is therefore Nexans policy to mitigate risk of data breach, data losses or misuses.

Procedures and processes are governing the use of personal information to address the growing legitimate expectations about privacy and data protection, including with business partners.



# 7. BUSINESS PARTNERS

Nexans commits to respect the CSR (Corporate Social Responsibility) 3E principles:



**EMPLOYEES WITH HUMAN RIGHTS**



**ENVIRONMENT WITH THE ENVIRONMENT LAWS**



**ETHICS WITH ETHICAL BUSINESS**

Nexans respects the 3E principles not only internally with its employees, but also requests its suppliers and sub-contractors to respect the same CSR principles

*(<https://www.nexans.com/csr/Supplier-CSR-Charter.html>)*

By signing Nexans Supplier CSR Charter, Nexans suppliers commit to implement the 3E principles towards their employees and ensure that their own suppliers adhere to equivalent principles.

Moreover, to secure its supplier CSR performance continuous improvement, Nexans requests also its key suppliers to provide their CSR scorecard, reflecting their CSR performance. The CSR scorecard is issued by EcoVadis or equivalent internationally recognized CSR expert, after doing the assessment of the supplier's CSR management.



# 8. PRACTICAL IMPLEMENTATION



The principles listed in the present Charter are to be implemented by all the entities of Nexans Group, wherever they are located. The respect of such principles is monitored through various Key Performance Indicators (KPIs) and processes:

- all newly hired employees who have an individual professional computer must complete an Ethics & Compliance training as part of their compulsory onboarding course. This training highlights that Nexans upholds the highest level of integrity in all the countries it operates: it does not matter if lower standards are considered acceptable in some countries or by some of our business partners, as Nexans levels UP and applies identical standards for all activities, everywhere
- all top executives, managers and key personnel throughout the Group must complete the Compliance Week course every year. This course contains reminders about the basic ethics & human rights rules and encourages anyone, whether potential victim or witness, to report any suspicion or violation through the whistleblowing tool
- a human rights questionnaire is circulated to a sample selection of the Group's HR community every year, on a rotating basis, to perform a risk assessment, measure the maturity level of every site and help adopt any remediation measure when needed.
- signature of Nexans Supplier CSR Charter
- thorough due diligence is conducted before contracting with sales intermediaries, including adverse media coverage mentioning any potential human rights violation
- the Group Audit department controls the safety at work and human rights aspects in the framework of audits performed
- human rights aspects systematically assessed when auditing our business partners
- Nexans' CSR performance, including human rights aspects, is assessed every year by independent CSR experts internationally recognized, as well as financial and non-financial rating agencies

*Sanction: this Charter contains fundamental principles for the protection of basic human rights. Hence, any willful violation of the above principles, or any breach which is not remedied, will trigger disciplinary sanctions up to dismissal, and in some cases legal consequences such as fines and imprisonment.*



# Nexans has signed up to the UN Global Compact

# NEXANS HAS SIGNED UP TO THE UN GLOBAL COMPACT



Nexans signed the United Nations Global Compact in December 2008. By joining this initiative, our Group has made a commitment to support and implement ten fundamental principles in the areas of human rights, labour standards, the environment and anti-corruption, within its sphere of influence.

## HUMAN RIGHTS

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses

## LABOUR STANDARDS

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

## ENVIRONMENT

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

## ANTI-CORRUPTION

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery

For more information: [www.unglobalcompact.org](http://www.unglobalcompact.org)

# Fighting Corrupt Practices



Nexans Group wishes to make a positive contribution to the countries and communities in which it operates by creating wealth and jobs and developing skills.

Nexans does therefore not tolerate corruption and is committed to showing transparency in its transactions and lobbying practices.



## BRIBERY AND CORRUPTION

Bribery and corruption is incompatible with the ethics of Nexans and its support for the Global Compact. The violation of anti-corruption laws is sanctioned by heavy fines for companies and prison sentences for individuals.

### ACTIVE CORRUPTION

None of us should directly or indirectly make or offer to make payments to government officials or customers, whether public or private entities, to obtain contracts or other advantages. This includes indirect payment through intermediaries such as agents, freight forwarders, commissioners and others. It includes facilitation payments even though, in some countries, facilitation payments are legal as they may still be illegal in the country of origin. In some legal systems, simply turning a blind eye on suspicions of bribery and corruption can result in liability for Nexans and for you personally.

### PASSIVE CORRUPTION

None of us should directly or through an intermediary, request or receive gifts, promises or undue advantages of any kind whatsoever, for ourselves or to the benefit of a third party, to act or refrain from acting in the exercise of our functions at Nexans, or to grant an advantage or favor to a third party thanks to our position at Nexans.



## GIFTS AND INVITATIONS

We must not offer gifts or make favors in return for favorable treatment or to gain any business advantage. When we offer gifts or invitations, we must remain within the **reasonable limits**, which the Group policy sets at EUR 100. This threshold may only be adapted pursuant to applicable laws and customary commercial practices.

Nexans discourages its employees from accepting gifts and invitations from business partners. Group policy sets the acceptable gift-receiving value at EUR 50. In any case, we must not accept any gift that could influence (or be considered as intended to influence) our judgment or which may undermine our **duty of loyalty** to Nexans.

Any gifts offered or received must comply with the above principles and we may never accept gifts in **cash**. When in doubt, discuss it with your manager.



## INFLUENCE PEDDLING

Nexans employees must not solicit a person who has, or claims to have, influence on the decision-making of a public official, in order to obtain, through the improper influence of such person, an undue advantage from a public official, to the benefit of Nexans.

Any request, receipt or the acceptance of the offer or the promise to use such improper influence is prohibited, whether or not the influence is exerted or whether or not the supposed influence leads to the intended result.

The difference between trading in influence and bribery is that, for influence peddling, the recipient of the advantage is not the decision-maker/official and the latter may be unaware of the crime.

Conversely, it is also prohibited for Nexans employees to uphold themselves as someone close to power and to offer to Nexans' commercial partners to exert improper influence on public officials in their favor, to obtain undue advantages of any type whatsoever.





## CONFLICTS OF INTEREST

A conflict of interest can arise when social, economic or political activities of employees, or those close to them, influence or could influence their **objectivity** and **loyalty** to Nexans.

Working in a position or function or holding a financial interest in a competing organization, customer, supplier or commercial partner of Nexans, when your duties within the Nexans allow you to have an influence over this relationship, constitutes a conflict of interest.

You must avoid conflicts of interest as your decisions at Nexans shall not be influenced by personal or private considerations.

But if you find yourself in a situation that could represent a conflict of interest or give the impression of influencing your judgment and actions, you must disclose it online, through the dedicated process available in your personal profile, or inform your line manager in writing if you do not have access to the intranet. Your disclosure will be assessed by your line manager, your human resources manager and / or the legal / compliance team. Pending the conclusion of the assessment, you must withdraw from decision-making that creates or could be perceived to create a conflict of interest so as to remain impartial, professional and competitive in your dealings with contractors and suppliers.



## POLITICALLY EXPOSED PERSONS (PEP)

Any Nexans employee who could be perceived as « politically exposed » must disclose it to his / her line manager as well as through the Nexans intranet process for employees who have a personal online profile.

Will be considered as a politically exposed person any Nexans employee who:

- has or has been entrusted with prominent political, governmental, military, judicial or administrative function or held a senior executive functions within a state-owned corporation or important political party, whichever the country ;

or

- of whom a business associate, an immediate family member or close friend holds or has held such a position.

Your disclosure will lead to an internal assessment of your position by your line manager your human resources manager and / or the legal / compliance team to determine if you are, indeed, deemed politically exposed. In such case, it will be assessed whether your personal situation may have an influence on your functions within Nexans. If so, specific remediation measures will be implemented, such as a confidentiality ring, dual decision-making process, reallocation within the Group to a position at least equivalent.





## POLITICAL ACTIVITIES

The general policy of Nexans is that we do not make contributions to political parties, organizations or committees. In any event, any payment made must comply with the law and have the prior written agreement of the Area Management.

The Group respects the right of its employees to participate in political activities **personally** as long as it is clear that they do not represent the company or act on its behalf. Employees must not engage in political activities during work hours or use the company's resources.



## COMMUNITY RELATIONS

Nexans supports a dialogue with communities and representatives of civil society.

Support for local initiatives in favor of solidarity, health, education, economic and social development, the environment, culture and sports is the responsibility of each entity after receiving approval from the Area's Management.



## MONEY LAUNDERING PREVENTION

Money laundering occurs when the illicit origin or nature of money or assets is covered up by legitimate business dealings. The opposite, which consists in the use of legitimate funds to support illicit activities (including the financing of terrorism or counterfeiting) is also prohibited.

Nexans undertakes to comply with all international laws on money laundering and financing of illegal activities. The Group only deals with customers whose commercial activities and source of funding are legal.

Each company of the Group implements customer **identification** procedures.

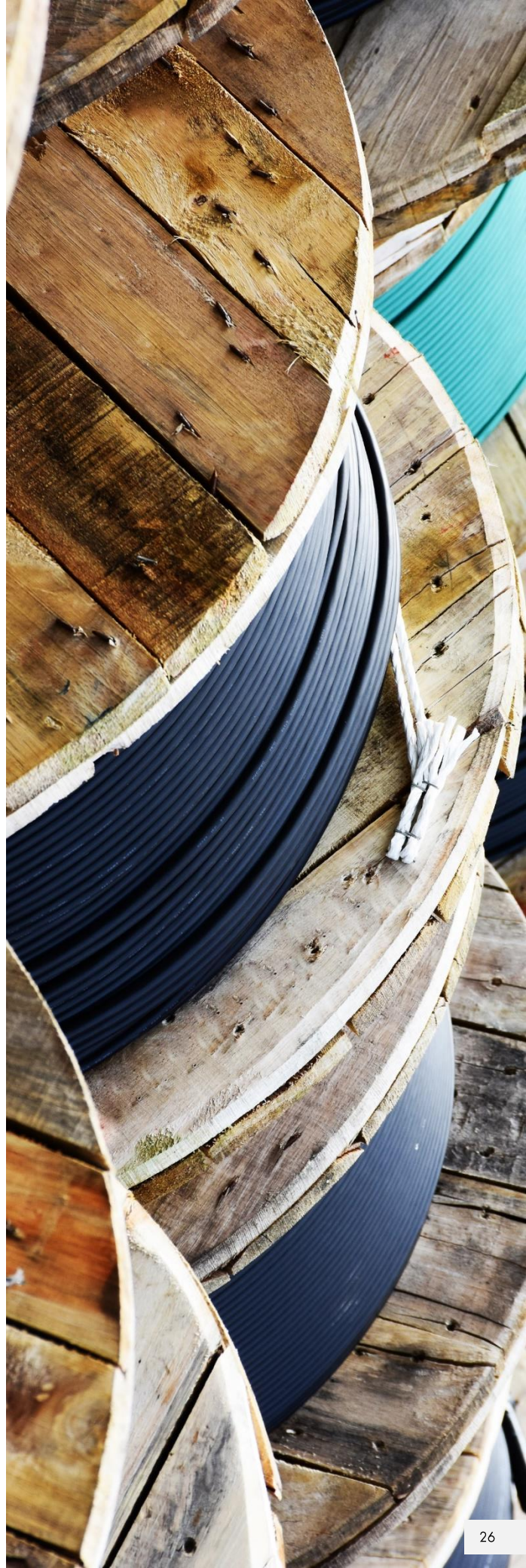
Each of us must be vigilant with regard to orders or **unusual payments**, particularly **complex** exchange structures and fund transfers to or from countries unrelated to the transaction or tax havens.

> If credited funds are of unknown origin (i.e. if the crediting entity is not registered within Nexans' database), then you must:

- **Request the bank to withhold the funds**, which is technically possible only in case of early detection of the payment (i.e. before the transfer value date is recorded);
- **Run the necessary due diligence investigations** to check the legal entity which credited the funds (Dow Jones + Internet),
- Request and obtain a **written affidavit from the client** explaining and demonstrating the link between the client company and the entity which made the payment;
- If possible, **detain shipment** until doubts are lifted;
- **Bring the situation to the attention** of the General Counsel and CFO of the Business Group.

> All instances where payment is received from a legal entity which differs from the corporate entities registered as clients and agreed recipients of the order / agreed invoiced entities may raise **legal and accounting issues**. This type of situation may turn out to be highly detrimental to the Group and expose us to money laundering accusations if we are not in a position to demonstrate the origin of the funds received.

> All commercial transactions must go through the preliminary due diligence process established in the Group Tender Review and Contract Risk Management Procedure (**GMP8**), which includes reputational background check of the commercial partner, transportation / invoicing / payment conditions, etc. This step is fundamental : indeed, if a payment from unknown origin were to be credited on the Group's accounts, the situation would be critical in terms of compliance and recovery.





# Fair competition



Nexans is committed to **loyal and open competition** in strict compliance with antitrust laws. These laws apply to every level of business.

Nexans does not tolerate any breach to antitrust laws. Antitrust and competition laws prohibit competitors from entering into any form of agreement, from concerted action, whether express or tacit understanding or collusive action that may have as their object or effect the restriction of free competition. Such violations may be complex and can give rise to severe civil and criminal penalties, which can apply to private individuals in addition to legal entities. Competition rules apply to all hierarchy levels within the Nexans Group.

Each of us must be very careful not to entertain relations, even informal ones, with competitors which may be qualified as an **illegal agreement or arrangement**.

In particular, Nexans employees must not participate in:

- price-fixing arrangements,
- market sharing or customer allocation,
- production restrictions or sales quota agreements,
- bid-rigging with other companies replying to a tender,
- unfair trade practices,
- arrangements or agreements to exclude a competitor from the market or to restrict market access for new competitors through unlawful means.

Details are provided in the General Management Procedure "Nexans Antitrust Guidelines" (**GMP6**) as well as in the Guidelines for when distributors / clients are also our competitors.

When in doubt, the Legal Department should be consulted early enough and prior to acting to avoid any risk of non-compliance.





# Export control and trade sanctions



It is Nexans policy to ensure that its trade operations worldwide comply with export and import control laws and with regulations establishing trade sanctions and embargoed countries ("trade regulations").

Before exporting or importing a product, software, technology, or any related document, its category and classification must be verified in order to determine whether special authorization is necessary. A background check must similarly be run on all our commercial and financial partners to ensure that they do not appear on lists of entities or individuals under sanction

Accordingly, it is the responsibility of all Nexans employees to know and follow the applicable Trade Regulations. Please also consult the Export Control Guidelines for more details (GMP7).

Failure to observe export and import control laws may result in restrictions or prohibitions on the way Nexans conduct business. Non-compliance with trade regulations can result for Nexans in charges, fines and impact on operating our business: difficulties in obtaining licenses, risk of being blacklisted by governments, disruption or termination of relations with banks and suppliers, restrictions on travel.

For Nexans employees such failure can result in serious consequences including fines and/or imprisonment.



# Our commercial partners



To build solid, long-lasting relationships Nexans is committed to honesty, trust and mutual interest with its customers, suppliers and subcontractors. Commitments to third parties are made by duly authorized employees.

We respect the tangible and intangible **property rights** of our commercial partners in respect of any items that they entrust to us.

We preserve the **confidentiality** of information entrusted to us.

We manage the personal data of our commercial partners responsibly and in compliance with the laws governing **privacy protection**.



## CUSTOMER RELATIONS

Nexans treats its customers with integrity and fairness whatever their size.

We are committed to promoting our products and services in a manner that is honest and fair. We ensure that any statements, communications and presentations that we make are accurate and reliable.



## AGENTS, CONSULTANTS, DISTRIBUTORS AND BUSINESS PARTNERS

Contracts establishing commercial relationships between the Group's entities and agents, representatives, consultants and distributors are signed exclusively by two authorized Senior Officers of the Nexans contracting Company.

Contracts are only signed once **all required integrity due diligence** has been completed and all required approvals have been obtained.



Details are provided in the General Management Procedure “Preventing corruption when dealing with Agents, Consultants, Distributors and Business Partners” (**GMP4**).

We require our agents, consultants, distributors and Business Partners to commit to comply with business and ethics rules, particularly with regard to anti-bribery laws, comply with competition laws and import and export control regulations.

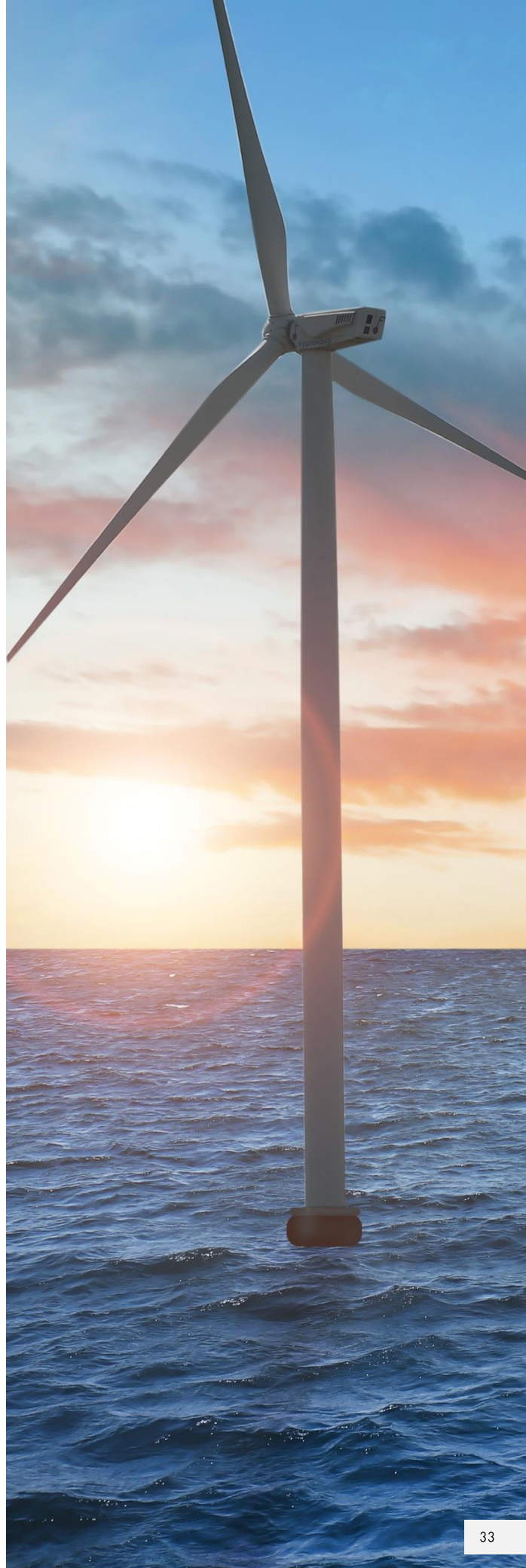


## SUPPLIER AND SUBCONTRACTOR RELATIONS

We are judged on the quality of the relationships that we maintain with our suppliers. In particular, our customers and rating agencies evaluate us on the basis of our **selection criteria** as well as the commitment of our suppliers to conduct their business responsibly.

We select suppliers through **open and competitive invitations to tender**. We must ensure that all tenders are given equal consideration.

Through the signature of our CSR Supplier Charter, we request our suppliers to **share our commitments**, particularly with regard to labor conditions, respect for human rights and respect for the environment.





# Our shareholders and financial partners



Nexans ensures **equal treatment** for all its shareholders. We communicate regularly, **openly** and **transparently** with our shareholders and our financial partners.

Nexans complies with strict standards in respect of **corporate governance**, **internal control** and **risk management**.



## ACCURACY AND COMPLETENESS OF FINANCIAL DATA

It is essential that all financial, legal, economic, industrial, commercial, social and environmental information provided is accurate and not misleading to ensure compliance with our legal obligations, particularly towards our shareholders, our partners and the authorities, to justify decisions we make and to preserve the credibility and reputation of our Group.

All obligations, procedures and guidelines laid down by your legal entity with respect to internal reporting and the recording, safeguarding and archiving of information, must be complied with.

We must ensure that all transactions and operations are recorded accurately and in full detail and we must cooperate fully with the internal and external auditors responsible for verifying them.

When in doubt, you should share your questions, seek advice, and, if necessary, immediately report any irregularity or violation of these rules to your manager or the Group's Legal Department.

Falsifying a document or creating misleading information constitutes fraud.

Nexans does not tolerate fraud of any kind. All our data must accurately reflect the relevant situation, operation and transaction.



## INSIDER TRADING

Using inside information to buy or sell securities listed on the stock exchange or sharing inside information with someone else who then trades securities listed on the stock exchange is subject to sanctions for “insider trading”. These sanctions can include significant fines and prison sentences.

Inside information is information of a precise nature which has not been made public, which, if it were to be made public, and which, if it were made public, would be likely to have a significant effect on the prices of a listed security. A reasonable investor would also be likely to use such information as part of the basis of his or her investment decisions.

Inside information is notably:

- regular or periodic information regarding financial and accounting data of the company
- specific information relating to one-off projects and events (notably acquisitions, divestments, claims, contracts, significant investigations, etc.)

A General Management Procedure deals with the “Prevention of Insider trading” and sets forth the procedure for maintaining the “List of insiders”, both permanent and occasional (GMP2).

Only authorized individuals may disclose confidential information outside the Group. The Legal Procedure “Public Disclosure of significant information” sets out the appropriate methods.

**Anyone having inside information about Nexans or its commercial partners must refrain from buying or selling shares or other securities in Nexans or the partner.**





# Environment & Product Responsibility



Nexans is committed to minimizing the impact on the environment of its activities and its products and offering solutions contributing positively to the global environmental and energy issues (rise of energy demand, increase in mobility needs, climate change, urbanization, resources scarcity, ...). The Group is committed to ensuring the safety of installers, operators and users of infrastructures, buildings, means of transport, equipment and machines equipped with its cables and cabling systems.



## PROTECTION OF THE ENVIRONMENT

Regardless of where we operate, we strive to reduce the impact of our activities on the environment through **risk and accident prevention** measures, by controlling our consumption and by decreasing, treating, and recycling our waste and managing our pollution risks. We must each make our own contribution according to our function by:

- the strict application of all regulatory obligations as well as Group obligations regarding the environment,
- taking all necessary measures to implement the Group's **environmental management system** (described in the Group Environmental Manual) and contributing to improving the results,
- participating in energy saving programs and **reducing consumption through raw materials** programs, and managing pollution risks (prevention and control).

The Group's environmental policy is available on the Industrial Management intranet website.





## PRODUCT RESPONSIBILITY

The trust of our customers is based primarily on the **quality and safety** of our products. We must all contribute to this. Each of us, depending on our responsibilities, must:

- regulatory and internal standards, favoring the most demanding ones in terms of safety,
- ensure the strict application of quality controls at each stage of production; quickly report or react to any quality problem in order to correct it,
- ensure that the technical documentation and installation and safety instructions that accompany our products are perfectly clear to prevent any risk of accidents,
- take into account all safety or quality problems reported by installers and customers.

We work closely with our customers to develop sustainable cabling solutions to transport energies and data efficiently and safely. Nexans aims to improve the quality of life of all the final users.

We strive to satisfy our customers to the extent possible by providing them with **accurate information** about the composition of our products and their environmental impact throughout the **life cycle**. We provide them with solutions for handling and recycling their end-of-life cables.

# Safeguarding information and assets





Nexans respects the private life of its employees and does not interfere in their conduct outside the workplace.



## PROTECTION OF COMPANY RESOURCES

We must all act with integrity, vigilance and common sense to ensure that the Group's resources and opportunities are not misappropriated, wasted, lost, damaged, misused, theft or infringed. These resources include work time, intangible assets and confidential information.

All equipment, information, ideas and data that you use or to which you have access in your work belong to the Group or its partners. The Group's resources must be used solely for professional purposes. The same is true for opportunities identified as part of your duties.



## COMPLIANCE WITH CONFIDENTIALITY RULES

Intellectual property, industrial know-how, strategic analyses and plans, financial, technical and commercial information and all confidential information are highly valuable assets and the Group could suffer considerable damage if they were disclosed without authorization.

All confidential information, and particularly data regarding customers and suppliers, must be kept secure and returned upon departure from the Group.

We must avoid discussing or working on confidential information in public places where conversations can be overheard and the safety of the data can be compromised.



## THIRD PARTY'S INTELLECTUAL PROPERTY

The Group respects the intellectual property and protected information of third parties.

Confidential information belonging to a third party can only be used under an agreement approved by the Legal Department.

The loading of unlicensed software on to the Group's computers is prohibited.



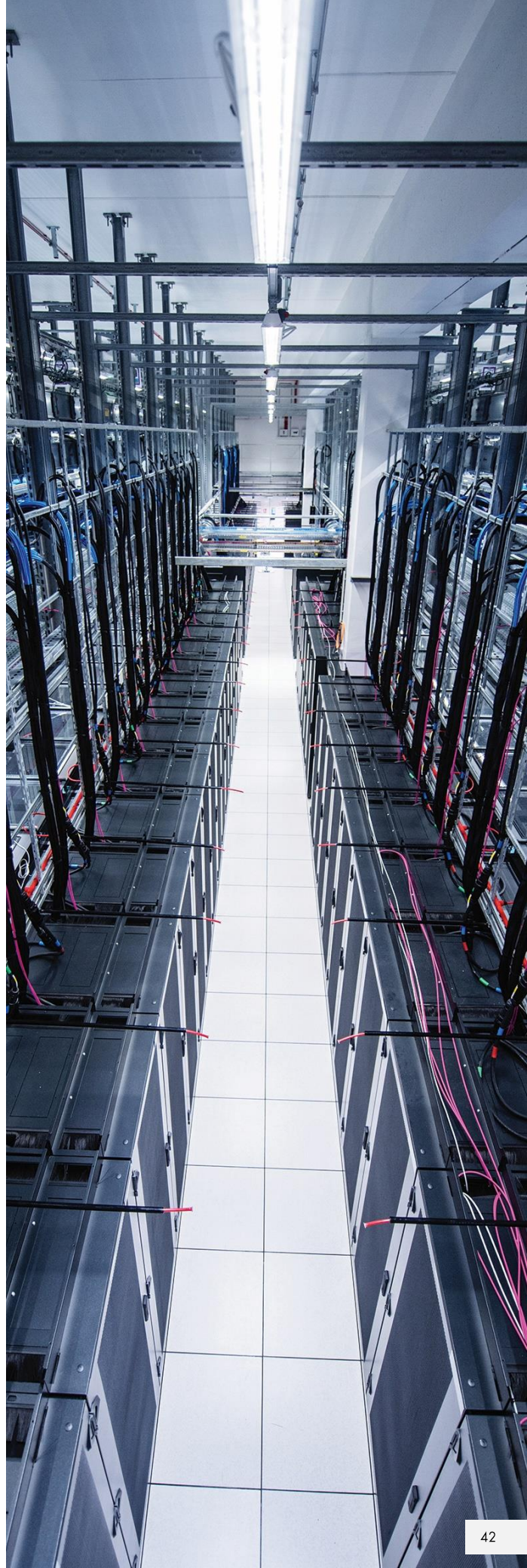
## PROTECTION OF PERSONAL DATA

The loss or misuse of personal data may bear substantial adverse consequences for individuals concerned. Fully aware of its responsibility, Nexans Group and its employees are committed to protect personal data of employees, clients or any third party. In addition, Nexans commits to protect the enforcement of rights by such individuals pursuant to the European Union Data Protection Regulation ("GDPR") and applicable national or local laws and regulations.

In this framework, Nexans collects and processes personal data for legitimate purposes only and ensures, through appropriate technical and organization measures, that such data is protected against loss, modification, misuse or unauthorized disclosure.

To this end, Nexans has issued a « Personal Data Protection Policy» which applies to all Group entities worldwide and establishes principles and guidelines that shall govern data processing, in particular for those employees whose functions within the Group may involve personal data processing.

A network of Local Data Protection Correspondents has been appointed in over 30 countries where the Group operates to coordinate Group actions. Similarly, personal data protection Correspondents were appointed within key functions of the Group (in particular HR, IS, Sales & Marketing functions).





Local Data Protection Correspondents are notably entrusted with the following missions :

- Keep a register of notified personal data processing operations up to date, with Information related to the purposes of the processing, the categories of personal data processed, the duration of data retention, the recipients of these data (internal and external), IS security measures implemented...;
- Ensure, with the data controller, that a data processing agreement is executed with external providers in case of data processing by a third party provider on behalf of Nexans Group;
- Train staff handling personal data;
- Inform employees of their rights and obligations with regard to personal data protection;
- Immediately inform the Group Data Protection Officer and the Group IS Security Service in case of breach of the personal data protection Policy;
- Provide advice and recommendation in the framework of privacy impact assessments designed to enable organizations to analyze the risks that are inherent in proposed data processing activities before those activities commence.



# Whistleblowing system



Any Nexans employee, but also any client, supplier, sub-contractor or shareholder and more generally, any third party, may report a compliance breach directly to the Group Ethics Correspondent through the online whistleblowing system made available by the Group (phone line available as well), which can be found under the following address:

<https://nexans.speakup.report/en-GB/alert/home>

The online whistleblowing system is also available (i) on the Group's website, (ii) on main search , or (iii) through the Group's intranet page accessible to all employees.

Local hotlines offering a local language service have been set up to cover a large number of countries where the Group operates. Local phone numbers are displayed on the online platform.

Group employees may also use other existing reporting channels in the Group such as hierarchical management of Human Resources contacts.



## WHICH INCIDENTS SHOULD BE REPORTED?

Incident reporting may be made for the following matters covered by the Code of Ethics and Business Conduct:

- accounting irregularities;
- financial and banking irregularities;
- any case of corruption or influence peddling, whether potential or effective;
- fraud;
- conflict of interest situations;
- violation of competition law;
- harassment and discrimination at work;
- violation of health, safety and hygiene regulations at work;

- child labor;
- infringement of the right of employees to form or join the unions of their choice and to participate in collective negotiations;
- violation of human rights;
- disregard for the environment or any other breach to the Corporate Duty of Vigilance;
- violation of confidential information and Group's intellectual property;

The Group Ethics Correspondent will treat each incident report with the highest degree of confidentiality and will guarantee the confidentiality of the person making the incident report as well as all personal confidential data as they are collected, communicated and stored.

Nexans guarantees that the good-faith use of this procedure in compliance with local applicable law will not expose the reporting individual to any sanction even if the facts are not conclusive or do not lead to any investigation or sanction. However, abuse of this procedure for malicious or defamatory purposes may result in disciplinary sanctions and/or even prosecution.

In case of any uncertainty or doubt regarding the interpretation of any clauses of this Code, you may consult your **direct manager**, the **Human Resources Department** or the **Legal Department** or the **Ethics Correspondent**. Any client, supplier, sub-contractor, shareholder and any third-party stakeholder may consult the Ethics Correspondent. They will advise you about the best way to proceed.

#### Management of incident reports under the Nexans' Code of Ethics and Business Conduct



### POSSIBILITY TO REMAIN ANONYMOUS

Anonymous incident reports must be sufficiently detailed and contain enough material information to allow to warrant effective and appropriate investigation.





## NOTIFICATION OF GROUP ETHICS CORRESPONDENT

Any incident report which has been made either through regular hierarchal reporting channels existing in the Group or the online whistleblowing platform will be transferred immediately to the Group Ethics Correspondent, who in turn, in strict compliance with the law and depending on the subject of the incident report, on a need-to-know basis, will inform the General Management, the Secretary General & General Counsel, the Human Resources Director, and the Audit Director.

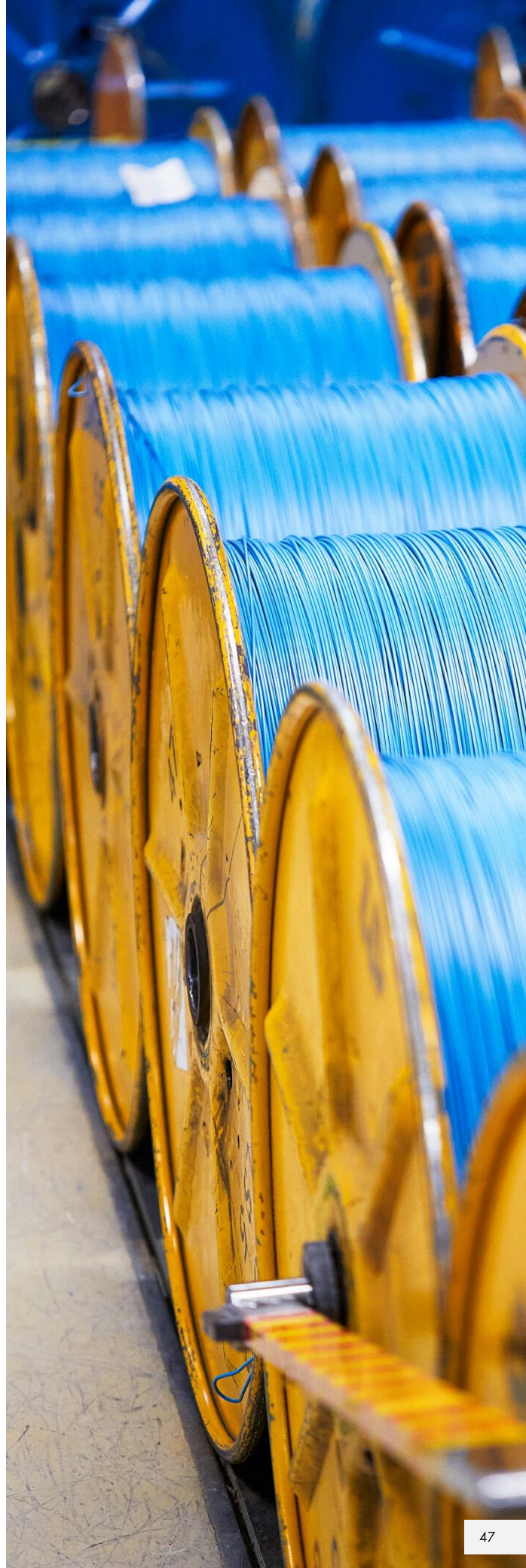


## PROTECTION OF INDIVIDUAL RIGHTS

Author of an incident report: Individuals who make incident reports or use the whistleblowing system are assured that precautions will be taken to protect them and guarantee confidential treatment by those who receive their personal information.

The good-faith use of this incident report process, even if the facts are not conclusive or do not lead to any discovery, will not expose the reporting individual to any sanction.

Whistleblowers will also benefit from the protection granted to them by laws and regulations to which the Group is subject, notably protection standards set by the European Union. In accordance with the law, Nexans will shield whistleblowers from any type of retaliation measure : dismissal, demotion, civil / criminal or administrative prosecution.





## INFORMATION ABOUT THE INDIVIDUALS NAMED IN A REPORT

Any person who is the object of an incident report and who is subject to the verification process hereunder report will be presumed innocent. The person will be informed by the management, heard in the frame of the verification process unless the process is abandoned.

When provisional protective measures are necessary, in particular to prevent the destruction of evidence, the person who is the object of a report will be informed after the adoption of these measures.

The Group Ethics Correspondent: bound by an enhanced obligation of confidentiality, the Group Ethics Correspondent will recall this obligation of confidentiality to any person of the concerned Departments or Business Divisions who, in accordance with the present procedure, may receive personal data when necessary for the handling of the report at certain stages.



## DATA SECURITY AND DATA RECTIFICATION

The Group Ethics Correspondent will take every necessary precaution to preserve the security of the data as it is collected, communicated and preserved. In accordance with French data protection law, any individual identified hereunder will have a right of access and of rectification of any personal information related to him/her by contacting the Group Ethics Correspondent:

[ethics.correspondent@nexans.com](mailto:ethics.correspondent@nexans.com)



The image features a dark blue background with a cityscape at night. The city lights are blurred into streaks of light, creating a sense of motion and energy. The Nexans logo is prominently displayed in the upper center. The logo consists of a stylized red 'N' followed by the word 'exans' in white lowercase letters. Below the logo, the tagline 'ELECTRIFY THE FUTURE' is written in white uppercase letters.

**Nexans**  
ELECTRIFY THE FUTURE