



**General Cable**

**ONE COMPANY**  
CONNECTING THE WORLD

## Supplier Code of Ethics & Business Conduct



# ETHICS & COMPLIANCE

PREVENT • DETECT • RESPOND

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# Introductory Statement



**Pradeep Menon**  
Senior Vice President, Chief  
Procurement Officer

We believe in doing the right thing and are committed to always operating with integrity. Our value of integrity places on each of us the obligation to conduct our business with the highest of ethical and compliance standards and expect our business partners to do the same. That is why we only partner with suppliers who share our values and commitment to General Cable's Supplier Code of Ethics and Business Conduct.

Our shared values are at the core of what we do, and our Supplier Code is derived from that foundation. By upholding our core values, our Company earns the trust of stakeholders and creates shared value. Suppliers are expected, in all their activities, to maintain high ethical standards, acting with integrity, and to operate in full compliance with applicable laws, rules and regulations of the countries in which they operate.



**Roberto A. Sacasa**  
Senior Vice President, Chief  
Compliance Officer

That's what makes this Code so important. It's not only a reflection of how we do business, but also of who we are as a company. Ultimately, General Cable's overall reputation is in your hands. We ask you to be vigilant for any conduct that seems suspicious, unusual or potentially a breach of our ethical and compliance standards. If you feel unsure about any business interaction, or if you view conduct in the company that doesn't seem to meet our high standards, we ask you to contact the General Cable [Global Legal Team](#), the [Global Compliance Office](#), or the [General Cable Helpline](#) (See page 10 for additional contact information).

We have developed this Code to assist you in understanding what it means to conduct business in an ethical manner as well as how to make the best decisions for the company. While this Code deals with areas of concern, it cannot cover every situation which may arise. Suppliers are expected to exercise their own best judgment and discretion within the parameters of this Code, keeping in mind the high standards to which the Company is committed. Thank you for your commitment to integrity and to safeguarding and enhancing our reputation for the highest of ethical and compliance standards.

Sincerely,

Handwritten signature of Pradeep Menon in black ink.

**Pradeep Menon**  
Senior Vice President &  
Chief Procurement Officer

Handwritten signature of Roberto A. Sacasa in black ink.

**Roberto A. Sacasa**  
Senior Vice President &  
Chief Compliance Officer

# OUR SUPPLIER CODE OF ETHICS & BUSINESS CONDUCT

General Cable places a strong emphasis on being a responsible citizen, and we expect the same from our suppliers. Together, we must strive to exceed the expectations of our collective customers, stakeholders and the communities we serve. We consider our suppliers to be an integral part of our supply chain and expect them to meet or exceed established performance targets for sourced materials and services. Unequivocal honesty, integrity, forthrightness and fair dealing are expected in all of our business relationships with suppliers, and we are committed to sourcing materials from suppliers who share our core values of Caring, Safety, Integrity, Customer Driven, Aspire to the Extraordinary and Teamwork. Our Supplier Code highlights each of our values and provides guidance on the expected behaviors that are necessary to embrace and demonstrate them. In addition to operating at all times in full compliance with all applicable laws, our suppliers are responsible for knowing the expectations set forth in this Supplier Code (as it may be updated from time to time) and for demonstrating a personal commitment to our values and ethical principles.



# CARING

We **respect** each other and succeed as One Company. We work together, with a shared mindset, toward a common goal. We seek to understand, demonstrate empathy, and embrace the diverse opinions and cultures of others.

## Supplier Diversity

At General Cable, we recognize and value the benefits a diverse supplier base adds to our business and remain committed to providing opportunities for historically disadvantaged businesses, including small, minority-owned, disabled veteran-owned, women-owned, among others. We expect our suppliers to provide fair and reasonable access to business opportunities to all potential subcontractors who are capable of meeting or exceeding our high-performance standards.

## Diversity

A great deal of General Cable's innovative success is due to the value we place on the knowledge, skills and expertise of our team members. We respect our diverse workforce and are committed to making all employment decisions based on merit and without regard to race, color, national origin, religion, gender, age, marital status, disability, veteran status, pregnancy or maternity, sexual orientation or any other protected characteristic. General Cable expects our suppliers to make their employment decisions based upon merit as well, and without regard to these or any other legally protected characteristics. We feel that our workforce diversity – and that of our suppliers – makes us a stronger and more competitive global company working to succeed as One Company.

## Harassment

General Cable is committed to a workplace free from intimidation and harassment, encourages each of its team members to seek to understand and demonstrate empathy towards one another, and

expects the same of its suppliers. Suppliers shall not permit harassment - whether verbal, physical, or visual - towards another person which creates hostile and intimidating working conditions and undermines the integrity of the employment relationship. This may include harassment based on race, color, national origin, religion, gender, age, marital status, disability, veteran status, pregnancy or maternity, sexual orientation or any other protected characteristic under local law.

## Human Rights

General Cable strives to be a positive presence in the communities where we work. Our Company is committed to, and expects that same commitment from its suppliers, following all applicable labor laws, promoting human rights wherever applicable, and providing fair and equitable wages. We do not – and suppliers shall not – employ children and all applicable laws regarding these standards must be followed. We expect our suppliers and other business partners to comply with applicable labor and human rights laws. Our company does not use forced, indentured or involuntary labor, nor do we tolerate human trafficking. We expect the same from any of our suppliers or business partners.



# SAFETY

We **behave safely** in all that we do. We are committed to the safety of our people at all times. We understand and follow all safety rules and practices, and we highlight deficiencies we see. We assume personal responsibility for our individual safety as well as for the safety of others. We act safely on and off the job, and continuously recognize the positive impact of safe behavior on business results and on our personal well-being.

## Health and Safety

Suppliers shall provide a safe and healthy work environment for all team members and visitors.

Suppliers shall put in place procedures and systems to manage, track, and report occupational injury and illness, and supplier's employees shall receive training on the proper use of equipment, chemicals, and personal protective equipment. In cases where worker housing is provided, the housing shall be clean, safe, and sanitary.

## Environment

General Cable strives to operate its businesses in a sustainable and responsible way, and we are committed to achieving industry-leading standards and responding proactively to global environmental issues. We seek to do business with suppliers who share our concerns for and commitment to sustainable business practices. At a minimum, our suppliers shall produce and market products in an environmentally sound and responsible manner and comply with all applicable environmental laws. In addition, we encourage our suppliers to go beyond legal compliance and consistently look for new and better ways to conserve resources, reduce pollution and waste, and to enhance the communities in which they operate.

## Hazardous Substances

Any use, handling or transportation of hazardous substances shall comply with all applicable local and international standards and regulation. General Cable products adhere to environmental regulations established by the current European Union (EU) Restriction of Hazardous Substances (RoHS) Directive (2011/65/EU). This directive establishes acceptable limits of certain hazardous materials in electrical and electronic equipment.

The RoHS directive prohibits heavy metals such as lead, mercury, cadmium and hexavalent chromium, and flame retardants such as polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE) in electrical and electronic equipment, except where exempted.



# INTEGRITY

We work together with **integrity** and speak with truth and candor. We demonstrate teamwork and collaboration, and encourage the sharing of diverse opinions, ideas and views. We take personal responsibility to act with integrity, inspire trust with our suppliers and colleagues, and exhibit the courage to speak up and do the right thing.

## Anti-Corruption

Suppliers shall comply with all anti-corruption laws applicable to their operations, including the U.S. Foreign Corrupt Practices Act (FCPA). Suppliers may not offer bribes, kickbacks, improper payments or benefit of any kind to government officials or other third parties for the purpose of obtaining or retaining business or gaining an improper advantage.

## Gifts

While giving and receiving business courtesies such as gifts, favors and entertainment are common among some of our business partners, these can raise the appearance – if not the reality – of a conflict of interest. Suppliers may not offer any General Cable team member or representative gifts of more than token value, excessive entertainment or travel opportunities, loans, or other substantial favors in an effort to improperly influence the decisions of General Cable.

## Conflicts of Interest

General Cable's suppliers must avoid involvement in actual or apparent conflicts of interest between the supplier's interests and the interests of General Cable. Any actual or apparent conflict of interest should be disclosed.

## Anti-Competition

General Cable expects its suppliers to compete fairly in the marketplace. Suppliers shall comply with all applicable anti-competition laws and may not enter into formal or informal agreements that may limit competition.

## Confidential Information, Data Security, and Privacy

Suppliers shall protect General Cable's proprietary and confidential information that General Cable has a legitimate business interest in protecting. This includes, but is not limited to, specifications, operational data, models, prototypes, designs, materials, inventions, improvements, manufacturing methods and techniques, quality control and test methods and data, costs and pricing, financial information, marketing and sales data and plans, and product applications and includes any notes, summaries, reports, analyses, or other material derived in whole or in part from such information. Suppliers must follow all applicable data privacy laws that govern the handling of information and data provided by General Cable. This may include private and sensitive personal information, whether about the Company, its employees or its customers. Suppliers shall protect General Cable's confidential information and may not reveal such information to any other party unless properly authorized by General Cable's Global Legal Office or legally required to do so. Suppliers shall take all appropriate precautions to safeguard confidential and proprietary information under their control.

## Anti-Money Laundering

General Cable is committed to complying fully with global anti-money laundering and anti-terrorism laws. General Cable conducts business only with reputable suppliers involved in legitimate business activities using funds from legitimate sources. General Cable's suppliers are required to comply with applicable laws relating to money laundering and counter terrorist financing.

## Conflict Minerals

General Cable supports the humanitarian goal of ending the violence and human rights violations resulting from the mining of cassiterite (for tin), columbite-tantalite (for tantalum), gold ore, and wolframite (for tungsten) – these are the most commonly mined - (collectively “Conflict Minerals”) from the Democratic Republic of the Congo (DRC) and adjoining countries (the “covered countries”).<sup>1</sup> All suppliers of metals used in the manufacture of our products shall certify that no materials sold to us contain Conflict Minerals from the covered countries.

## Supply Chain Security

General Cable is committed to the security of its cargo importing into countries in which General Cable operates. General Cable maintains membership in the U.S. Customs Program Customs Trade Partnership against Terrorism (CTPAT). The international supplier is expected to maintain a secure facility and cooperate with General Cable by implementing and utilizing proper security procedures when preparing and handling General Cable’s merchandise and cargo.

General Cable encourages our business partners to become familiar with the CTPAT, AEO or similar security programs and their minimum-security criteria and if eligible consider becoming a member of a similar program available in your country of operation.

Suppliers must also take appropriate measures to safeguard the details of its security program and to protect sensitive data and information in all forms.

## Global Trade Compliance

General Cable’s suppliers are required to comply with all applicable international trade laws and regulations, including import, export, and re-export control regulations, as well as applicable embargoes, sanctions, and anti-boycott laws.



<sup>1</sup> **Covered Countries:** Angola; Burundi; Central African Republic; Democratic Republic of the Congo; Republic of Congo; Rwanda; South Sudan; Uganda; Zambia; Zimbabwe

# CUSTOMER-DRIVEN

We anticipate and **respond to customer needs**. We view all we do through the eyes of our customer, continuously striving to understand their business and anticipate and address their evolving needs. We focus on being value-added, innovative, timely and responsive with our customers and we sell, produce and deliver with quality. We expect our suppliers to share our commitment to our customers.

## Quality Products

General Cable selects suppliers who are committed to producing safe, quality products. Suppliers shall ensure the safety and performance of their products and services, as well as continuously improving their products by focusing on design, manufacturing, technology and quality control.

## Accurate Billing

Suppliers shall fairly represent the terms of sale on all records, including billing, time cards, invoices and quality testing reports. Suppliers shall keep accurate records and accountings. All billings shall comply with the negotiated terms and conditions of our agreements.

## Origin of Products

For products it provides to General Cable, supplier shall provide a statement of certificate of origin at the beginning of each year and inform General Cable in writing of any changes in origin of goods during the year.

## Records Management and Cooperation with Inspections, Audits, and Investigations

Suppliers shall maintain business records that are accurate, complete, fair, timely, and understandable, and in accordance with all applicable laws. Business records include, but are not limited to: accounts, quality reports, time records, expense reports, and submissions to General Cable, regulatory authorities, or others.

This also includes documentation necessary to demonstrate compliance with law and this Supplier Code or relevant to any pending litigation, audit, or investigation. Suppliers must cooperate with requests for inspections, audits, and investigations by General Cable or any of its authorized agents relating to compliance with this Supplier Code.



# ASPIRE TO THE EXTRAORDINARY

We **act responsibly** for our individual and collective actions and results. We embrace teamwork and assume responsibility for our actions and their consequences, both to the company and the communities in which we operate. We strive to perform, take ownership for successes and failures, and learn through continuous improvement. We expect our suppliers to represent our company with professionalism and create long-term shared value for our company and the communities where we live and work.

## Compliance with Code

Suppliers are responsible for ensuring that this Supplier Code is understood and applied at all levels of their organization. Suppliers shall monitor their adherence to this Supplier Code and ensure that all subcontractors providing goods or services to the supplier also comply with this Supplier Code. Suppliers shall promptly report all violations to General Cable and implement corrective actions to address any violation.

## Intellectual Property

Suppliers are required to respect intellectual property rights, both during their contract with General Cable and thereafter. Patents, copyrights, and trademarks belonging to others may not be used without express permission from the owner. Any transfer or sharing of technology or know-how must be done on a need-to-know basis and in a manner that protects intellectual property rights and is in compliance with local law.



## Non-Retaliation

Suppliers may not retaliate against any employee for reporting concerns in good faith about compliance with this Supplier Code.

## Corporate Social Responsibility

We encourage suppliers to develop sustainable and responsible practices, in line with our Corporate Social Responsibility philosophy ([www.generalcablecsr.com](http://www.generalcablecsr.com)), such as: eco-designed products, innovation, partnerships with their own strategic suppliers, and being good corporate citizens.

## Inside Information

If you possess inside information about General Cable, you may not trade in General Cable securities if the information you possess may influence your decision to invest or divest and this information is not available to the investing public. Further, you may not share inside information with any persons unauthorized to hold this information, including family and friends. Note that unauthorized persons may also include General Cable team members and executives.

# SUPPLIER CERTIFICATION OF COMPLIANCE

By its acceptance of any purchase order from General Cable, or any of its affiliates and subsidiaries, the supplier acknowledges its acceptance of the Supplier Code and intention to comply with its requirements.

## REPORT CONCERNS

For questions or to report concerns or violations of this Supplier Code, please contact:

### Contact Information

#### Global Legal Team

legal@generalcable.com

### Global Compliance HelpLine

#### BY PHONE:

- U.S. Toll Free +1 877 256 8862
- U.S. Direct +1 605 444 2360
- Non-U.S.

#### BY EMAIL:

TheGCHelpLine@generalcable.com

#### VIA THE WEB:

www.TheGCHelpLine.com

Country/Provider	Toll-Free Number
Australia	0011-800-1777-9999
Brazil	0-800-591-2077
Canada	1 877 256 8862
Chile	800-914-277
China	00 400-120-3062
Colombia	57-13816576
Costa Rica	506-40001845
Ecuador	1-800-000-599
France	0805-080258
Germany	0800-180-0873
Honduras	800-2791-9501
Mexico	01-800-681-6737
Norway	00 800 1777 9999
Peru	0800-78176
Portugal	800-180-253
Spain	900-839239
United Arab Emirates	8000 3570 2714
United Kingdom	00 800 1777 9999
United States	1 877 256 8862

\* For the most current list of AT&T Access Codes, visit [www.business.att.com/bt/access.jsp](http://www.business.att.com/bt/access.jsp)