

# CODE OF CONDUCT

OCTOBER 2023



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# THE WIRECO CODE OF CONDUCT

**01**

Be honest, fair and trustworthy in all of our WireCo activities and relationships.

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**02**

Obey applicable laws and regulations governing our business worldwide.

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**03**

Fulfill your obligation to be the Voice of Integrity and promptly report any concerns you have about compliance with law, WireCo policy or this Code.

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**04**

Simple compliance is more effective compliance. Effective compliance is a competitive advantage. We will work to run the Company in as competitive a way as possible – with speed, accountability and compliance.

# WHO SHOULD FOLLOW THIS CODE

This Code must be followed by anyone who works for or represents WireCo

## THIS INCLUDES >>

- WireCo directors, officers and employees.
- **Subsidiaries and controlled affiliates.** Entities in which WireCo owns more than 50 percent of voting rights or are under common control with WireCo are required to adopt and follow WireCo compliance policies.

Non-controlled affiliates should be encouraged to adopt and follow WireCo compliance policies.

WireCo employees working with third parties such as consultants, agents, sales representatives, distributors and independent contractors must:

- Require these parties to agree to comply with relevant aspects of WireCo's compliance policies.
- Provide these parties with education and information about policy requirements.
- Take action, up to and including terminating a contract, after learning that a third party failed to abide by WireCo's compliance policies.



## About This Code

This Code covers a wide range of business practices and procedures. While it does not cover every issue that may arise, it sets out our basic principles of ethics and business conduct. All of our directors, officers and employees must conduct themselves accordingly and seek to avoid even the appearance of improper behavior.

Go to WireCo's Employee Portal for detailed policy information and additional resources to help you.

# WHAT EMPLOYEES MUST DO

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## BE KNOWLEDGEABLE

Gain a basic understanding of this Code.

Learn the details of the Code that is relevant to your individual job responsibilities.

Learn about your detailed business and regional policies and procedures and understand how to apply them to your job.

If a law conflicts with a requirement in this Code or our policies, you must comply with the law; however, if a local custom or policy conflicts with this Code or our policies, you must comply with our policies. Consult with your manager and WireCo legal if you encounter a conflict between this Code, our policy, and local laws, customs or practices.

## BE AWARE

Stay attuned to and communicate developments in your area or industry that might impact WireCo's compliance with laws and regulations or reputation in the marketplace.

Understand WireCo may review, audit, monitor, intercept, access and disclose information processed or stored on WireCo equipment and technology, or on personally-owned devices which are permitted WireCo network access.

Company equipment should not be used for non-Company business, though incidental personal use may be permitted.

## BE COMMITTED

Promptly raise any concerns about potential violations of law or WireCo policy.

Cooperate fully and honestly in WireCo investigations related to integrity concerns. In the case of a violation of law, civil and/or criminal penalties may be imposed by a governmental agency or a court.

## THE COST OF NONCOMPLIANCE

Employees and leaders who do not fulfill their integrity responsibilities face disciplinary action up to and including the termination of their employment. The following examples of conduct can result in disciplinary action.

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### EXAMPLES>>

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- Violating law or WireCo policy or requesting that others do the same.
- Retaliating against another employee for reporting an integrity concern.
- Failing to promptly report a known or suspected violation of this Code or WireCo's policies.
- Failing to fully and honestly cooperate in WireCo investigations of possible policy violations.
- Failing as a leader to diligently ensure compliance with WireCo's integrity principles, policies and law.

# WHAT LEADERS MUST DO

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WireCo holds its leaders accountable for creating a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation. Leaders' responsibilities span prevention, detection and response to compliance issues.

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## PREVENT>>

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**Personally set the example for integrity**, not just through words, but more importantly, through actions.

**Ensure employees understand** that business results are never more important than ethical conduct and compliance with WireCo policies.

**Create an open environment** in which every employee feels comfortable raising concerns.

**Communicate the importance of compliance** with sincerity and conviction at every appropriate opportunity.

**Commit adequate resources** to your business's compliance program.

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## DETECT>>

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**Lead compliance processes** along with the audit and legal teams.

**Conduct periodic compliance reviews** with the assistance of business compliance leaders and/or the Internal Audit team.

**Implement control measures** such as "dashboards" and "scorecards" to detect heightened compliance risks and violations.

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## RESPOND>>

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**Document and escalate** any employee's expressed concern through the appropriate channels.

**Take prompt corrective action** to address identified compliance weaknesses.

**Take appropriate disciplinary action** for non-conformance.

**Integrate employees' integrity contribution** into evaluations and recognition and reward programs.

# BE THE VOICE OF INTEGRITY



Being the Voice of Integrity at WireCo isn't always easy, but when we raise integrity concerns, we make our Company stronger and protect our colleagues from harm.

You do not need to be certain that a violation has occurred. You have an obligation to promptly raise concerns when you see a situation in which our integrity policies are not being followed.

Confidentiality is respected, and you may even choose to remain anonymous. However, if you identify yourself, we are able to follow up with you more easily and provide feedback. Your identity and information will only be shared on a "need-to-know" basis. Any retaliation – whether direct or indirect – against employees who raise a concern is grounds for discipline up to and including dismissal.

- Your human resources leader or internal auditor.
- The Company's general counsel.
- Next level of management.

## HOW WE HANDLE INTEGRITY CONCERNS>>

WireCo fairly examines every integrity concern, and managers are required to escalate employees' concerns to a compliance specialist.

During an investigation process, WireCo:

1. Forms an objective investigation team.
2. Determines the facts through interviews and/or the review of documents.
3. Recommends corrective action, if necessary.
4. Provides the person who raised the original concern (if that person is known) with feedback on the outcome.

## HOW TO RAISE AN INTEGRITY CONCERN>>

WireCo offers several channels for raising concerns. You can choose to speak to someone about a potential integrity issue or put it in writing. Generally, your supervisor or manager will be in the best position to resolve an integrity concern, but [other resources include:](#)



## Raise a concern

The WireCo EthicsPoint system allows you to voice your integrity questions and concerns, anonymously if you prefer.

### Call the toll-free number:

- U.S. – 800-371-2173
- Australia – 1-800-551-155 (Optus) or 1-800-881-011 (Telstra) / Then dial: 844-287-1890
- Brazil – 0800-892-0644
- China – 108-888 / Then dial 844-287-1890
- Denmark – 800-100-10 / Then dial 844-287-1890
- France - 0800-90-2876
- Germany – 0-800-225-5288 / Then dial 844-287-1890
- Mexico – 800-288-2872 / Then dial 844-287-1890
- Netherlands – 0800-022-9111 / Then dial 844-287-1890
- Poland – 00-800-151-0065
- Portugal - 800-800-128 / Then dial 844-287-1890
- Russia – 363-2400 / Then dial 844-287-1890
- Spain – 900-99-0011 / Then dial 844-287-1890
- United Arab Emirates – 8000-021 / Then dial 844-287-1890
- United Kingdom – 0-800-89-0011 / Then dial 844-287-1890

Send an email to: [wirecolegal@wireco.com](mailto:wirecolegal@wireco.com)

Report online at: <https://wireco.ethicspoint.com>

If you prefer to write, address your concerns to:

Legal Department  
WireCo WorldGroup Inc.  
2400 West 75th Street  
Prairie Village, Kansas 66208 USA

# REGULATORY EXCELLENCE

## RESPONSIBILITIES OF EMPLOYEES

- **Know and comply** with the laws and regulatory requirements that affect your job responsibilities. WireCo provides regular training sessions to promote compliance with various laws, rules and regulations, including anti-discrimination, anti-harassment, and anti-corruption laws.
- **Treat regulators professionally**, with courtesy, honesty and respect at all times.
- **Coordinate with business or Corporate experts** when working with or responding to requests from regulators.
- **Be the Voice of Integrity and promptly escalate any potential issues** that may lead to a regulatory compliance breach.

## RESPONSIBILITIES OF LEADERS

- **Incorporate regulatory requirements** into business strategy and processes.
- **Assign owners to regulatory risk areas** and ask them to partner with appropriate affairs and regulatory experts.
- **Confirm you and your team have access to subject matter expertise** needed to manage regulatory risks.
- **Develop strong processes to anticipate risks**, including new and changing regulations.
- **Monitor regulatory compliance** on an ongoing basis and conduct periodic audits of key processes.



## What You Should Know

In every market in which WireCo operates, WireCo must comply with an ever-expanding array of laws and regulations that are often being enforced more aggressively than ever before. In some cases, laws made by one country seek to regulate activities that take place outside of that country. This environment demands that every employee and leader be committed to regulatory excellence.



# CONFLICTS OF INTEREST

**RULE TO REMEMBER >>** Always make business decisions based on what is best for WireCo, never what is best for you personally.

## OUR POLICY

You have a duty to ensure that nothing interferes with your ability to make all business decisions in the best interest of WireCo. This means that nothing you do should interfere, or appear to interfere, with your responsibility for objective and unbiased decision-making on behalf of the Company.

No activity at work or home should harm WireCo's reputation or good name.

You have a duty to disclose if your personal or financial activity may interfere or have the potential of interfering with your allegiance toward the Company.

Misusing WireCo resources or influence is prohibited. Even when nothing wrong is intended, the perception of a conflict of interest may have negative effects.

## YOUR ROLE

- Obtain prior approval from your manager, HR and general counsel before hiring, promoting or directly supervising a family member or close friend.
- Disclose financial interests you may have in a company where you could personally affect WireCo's business with that company.
- Do not accept gifts other than those of nominal value from suppliers, customers or competitors.
- Do not accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your peers.
- While incidental use may be acceptable, do not use WireCo resources, intellectual property, time or facilities for personal gain. Avoid any activity which creates the potential perception of a conflict between your personal interests and the interests of WireCo.



## What You Should Know

A potential conflict of interest must be promptly disclosed to the Company.

Disclosing potential conflicts of interest allows your manager to mitigate risks which may influence your business decisions.

It is almost always a conflict of interest for a Company employee to work simultaneously for a competitor, customer or supplier. You may not work for a competitor as a consultant or board member. The best policy is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except on our behalf.

If you are in a position to influence purchasing or procurement decisions or to retain outside firms on behalf of the Company, you must promptly disclose to your supervisor and to the Legal Department any relationship of any kind that you, your immediate family, or members of your household have with the Company's suppliers or individuals or entities that are seeking to become suppliers to the Company.

# INTERNATIONAL TRADE COMPLIANCE

**RULE TO REMEMBER >>** Always know what you're exporting, its destination, the end user, and the end use. Be sure to provide Customs with complete and accurate import documentation.

## OUR POLICY

WireCo will comply with all export control, economic sanctions and customs laws that regulate cross-border transfers of goods and technology.

## YOUR ROLE

### CUSTOMS >>

- Follow all business procedures relating to the import of goods.
- Only use WireCo-approved Customs agents.
- Report accurate, complete and timely information on import declarations, and provide accurate and complete product descriptions when classifying goods.

### EXPORT CONTROLS>>

- Follow all business procedures relating to the export of goods and technology.
- Follow "Know Your Customer/Know Your Supplier" procedures to ensure we do not do business with people or companies identified on government restricted party lists.
- Confirm all necessary licenses or authorizations are in place before any export transaction, and adhere to all export license or license exception requirements.
- Do not cooperate with any boycott of Israel or any other boycott or restrictive trade practice not authorized by the U.S. government. Seek legal counsel if a restrictive trade practice or boycott appears to conflict with the laws of another country.



## What You Should Know

**Customs laws** regulate the movement (import and export) of goods across national borders or customs territories, even in the absence of a commercial transaction or import duties.

**Sanctions** (including embargoes and boycotts) can restrict trade in some or most goods and services.

**Contact the Legal Department** if you are unsure about a transaction.

# COMPETITION LAW

**RULE TO REMEMBER >>** Do not enter into any agreement with competitors that deprives customers of the benefits of competition.

## OUR POLICY

Every WireCo employee has a responsibility to comply with all applicable competition laws, regulations, decrees and orders.

WireCo must never collude with other companies on price or terms to be offered to customers; agree with competitors to allocate markets or customers; or manipulate the bidding process.

## YOUR ROLE

- Do not propose or enter into any agreement or understanding with any competitor about any aspect of competition between WireCo and a competitor, including agreements on pricing, bidding, deal terms, wages or the allocation of markets or customers.
- Do not propose or enter into any agreement with any other party regarding whether or how to bid. Only submit bids if the purpose is to compete for and win a particular piece of business.
- Avoid contacts of any kind with competitors that could create the appearance of improper agreements or understandings. Actively disassociate yourself from any situations in which improper agreements or information sharing between competitors are raised, and promptly inform the general counsel.
- Do not provide, receive or exchange any of the following types of information with a competitor or its representatives, whether in person, electronically or at an industry meeting:
  - Prices.
  - Bids.
  - Customers, supplies, sales territories or product lines.
  - Terms or conditions of sale.
  - Production, sales capacity or volume.
  - Costs, profits or margins.
  - Market share.
  - Sales, marketing or development strategies for products or services.
  - Distribution methods.



## Talk to the Company's General Counsel

Before implementing any of the following:

- Sale of multiple WireCo products in “bundles”.
- Exclusive arrangements.
- Technology licenses that restrict the freedom of the licensee or licensor.
- Price discounts that depend on loyalty or volume or are offered only to certain customers.
- Pricing initiatives.
- Distribution or supply arrangements with competitors.
- Policies concerning access of customers and third parties to parts, software and other inputs for the servicing of WireCo equipment.
- Any proposed merger, acquisition or joint venture.

# IMPROPER PAYMENTS

**RULE TO REMEMBER** >> Do not permit or engage in bribery or corruption of any kind.

## OUR POLICY

WireCo prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector.

WireCo prohibits even small facilitation payments to expedite routine administrative actions, except in extraordinary circumstances and with the prior approval of WireCo's compliance team or general counsel, or where an employee's safety or security is at stake.

We maintain strong controls aimed at preventing and detecting bribery. This includes a process for appointing and managing third parties acting on WireCo's behalf in business dealings.

We maintain accurate books, records, and accounts that correctly reflect the true nature of all transactions.

Never offer, promise, make, or authorize a payment or the giving of anything of value to anyone in order to obtain an improper business advantage.

## YOUR ROLE

- Remember that providing gifts, entertainment or anything else of value to government employees is highly regulated and often prohibited. Do not provide such gifts and entertainment unless you have received prior WireCo counsel approval.
- The purpose of business entertainment, meals and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with or to unduly influence any current or prospective customers, suppliers, or other parties seeking to do business with the Company. No gift or entertainment should ever be offered, given, provided or accepted by any WireCo employee, family member of an employee or agent unless it: (1) is not a cash gift, (2) is consistent with customary business practices and reasonable in frequency and cost, (3) complies with the WireCo's Anti-Corruption Policy, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws or regulations, including the FCPA and the UK Bribery Act.



## What You Should Know

**Bribery** means giving, offering or promising anything of value to gain an improper business advantage.

**Facilitation payments** are small customary amounts paid to government employees to expedite routine clerical or administrative actions such as issuing permits.

- Follow Corporate and business guidelines regarding gifts and entertainment and other business courtesies.
- Never contribute Company funds or other WireCo assets for political purposes without obtaining prior approval from a Company officer or WireCo counsel, as applicable.
- Watch out for commissions that seem too large in relation to the services provided.

# FAIR EMPLOYMENT PRACTICES

**RULE TO REMEMBER >>** Treat all employees fairly and with respect.

## OUR POLICY

WireCo bases employment decisions on job qualifications and merit which include education, experience, skills, ability, performance, and the WireCo Business System (WBS) behaviors.

Employment decisions should also be made without considering a person's race, color, religion, national or ethnic origin, sex (including pregnancy), sexual orientation, gender identity or expression, age, disability, veteran status or other characteristic protected by law.

We respect human rights everywhere we work and do business with others.

WireCo will comply with all laws pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages and hours, as well as laws prohibiting forced, compulsory and child labor, trafficking in persons and employment discrimination.

## YOUR ROLE

- You may not refuse to work or cooperate with others because of characteristics covered by this policy such as race, religion, sex, age, or other characteristic protected by law.
- Create a work environment free from harassment on the basis of any protected characteristic, and free from bullying.
- Never make an unwelcome sexual advance to an employee or other person with whom you work.
- Never disclose employment data to a person who does not have a business need, the authority, or where required, the subject's consent.
- Consult with your manager and the legal department if you encounter a conflict between this Code, the Company's policies, and local laws, customers or practices.



## What You Should Know

WireCo absolutely prohibits taking adverse action against an employee because they have raised a concern about a violation of policy or law.

Go to WireCo's Employee Portal for detailed policy information and resources to help you.

# ENVIRONMENT, HEALTH & SAFETY

**RULE TO REMEMBER >>** Follow EHS procedures and be alert to environmental and safety hazards in your workplace.

## OUR POLICY

WireCo strictly complies with all environmental, health, and safety (EHS) laws that apply to our operations.

We develop and follow safe work procedures to ensure workplace safety and prevent injuries.

We install, maintain, and monitor environmental controls to ensure our emissions meet legal limits.

We assess the EHS risks of any new activity, whether designing a new product, selling in a new market, making a capital investment, or buying a new business.

Our EHS principles apply to everything we do – from making or servicing products and buying businesses to driving vehicles and disposing of waste.

## YOUR ROLE

- Understand and comply with all the EHS policies that apply to you, including Corporate policies, business policies, and any specific policies that apply to your site, position, or operation.
- Implement WireCo management tools and processes to find and fix EHS concerns at your site.
- Follow Corporate and business policies for managing, shipping, transporting, importing/exporting and disposing of hazardous materials and chemicals.
- Question unsafe or improper operations, and insist on a “stop work” if necessary to address them.



## Be the voice of integrity

Eliminating or guarding against hazards starts with identifying them. You must alert supervisors or EHS leaders if you are aware of hazards or standards that are being ignored or hidden.

### Red flags include:

- Failure to obtain or comply with regulatory permits.
- Deviations from written work practices – even if these deviations have become “routine”.
- Lapses in security or emergency preparedness.
- Inadequately maintained tools or equipment.
- Missing machine guards or faulty protective equipment.
- Unsafe driving.
- Failure to use lock-out, tag-out procedures or fall protection.

# RECORDKEEPING & FINANCIAL REPORTING

**RULE TO REMEMBER >>** Be honest, complete and accurate in our accounting, communications and decision-making.

## OUR POLICY

WireCo accounting and reporting will faithfully reflect the economic substance of the Company's business activities, consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.

We will prepare timely, accurate and complete financial information for use in reports to management, investors, regulators and other stakeholders.

We will ensure that management decisions are based on sound economic analysis based on complete facts with appropriate consideration of short- and long-term risks.

We will comply with all Company policies and applicable laws and regulations relating to the preservation of documents and records.

## YOUR ROLE

- Maintain effective processes and internal controls that fairly reflect transactions or events, as well as prevent or detect inappropriate transactions. Document and report all business expenses accurately in accordance with our policies.
- Protect WireCo's physical, financial and IP assets. Any suspected incident of fraud, theft, or misuse should be immediately reported for investigation.
- Maintain complete, accurate and timely records and accounts to appropriately reflect all business transactions.
- Create documents that are factual, accurate and complete, and follow Company policies in deciding when to retain and dispose of them.
- Avoid transactions that diminish share-owner value even if they enhance near-term financial performance.



## Be the voice of integrity

Raise a concern if you become aware of actions, transactions, accounting or reporting that are inconsistent with our controllable values and the protection of WireCo's reputation.

### Red flags include:

- Financial results that seem inconsistent with underlying performance.
  - Circumventing review and approval procedures.
  - Incomplete or misleading communications about the substance or reporting of a transaction.
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- Never engage in inappropriate transactions, including those that misrepresent the reporting of other parties such as customers or suppliers. Avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood.
  - Do not attempt to interfere with or seek to improperly influence, either directly or indirectly, the auditing of WireCo's financial statements.

# SECURING WIRECO OPERATIONS GLOBALLY

**RULE TO REMEMBER >>** WireCo has no greater responsibility than to protect its people and operations.

## OUR POLICY

We implement contingency and emergency response plans designed to ensure the security of our people and operations globally. Our plans include a process for identifying, and protecting against, the risks posed by man-made or natural incidents that affect our people, facilities, information technology assets and systems, or products, services and supply chain.

## YOUR ROLE

- **Maintain situational awareness.** Help us protect you, your colleagues, and visitors; know your surroundings.
- **Follow all entry/exit procedures.** Keep your badge on you at all times. Do not grant access to anyone who is not a guest of yours or being accompanied by a WireCo employee.
- **Conduct rigorous background checks** on new hires and contractors as permitted by law.
- **Comply with WireCo travel policies.** Make travel arrangements through the WireCo travel websites. Make use of the Travel Advisory System when planning travel. Obtain pre-clearances to designated countries.
- **Create and maintain a safe working environment.** Violence and threatening behavior are not permitted. Identify and report indicators or incidents of workplace violence to your manager, HR, or site leadership.
- **Employees should report to work in condition to perform their duties,** free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace are not tolerated.
- **Observe global immigration rules** by ensuring your employees and invited guests comply with global immigration regulations when traveling.
- **Be an active participant** in contingency, emergency response plan, and workplace violence prevention drills and security awareness sessions to ensure you have the knowledge to remain safe at work, home and on the road.



## Be the voice of integrity

Involve WireCo site management if you encounter security concerns (for example, thefts, assaults, missing employees or data loss). Report these events, or any other unusual or suspicious activity, to your manager or site leadership.



# INTELLECTUAL PROPERTY

**RULE TO REMEMBER >>** Every WireCo employee has a responsibility to safeguard WireCo's intellectual property.

## OUR POLICY

WireCo aggressively protects its intellectual property (IP) and enforces its rights against others who take or use WireCo IP without proper authorization.

WireCo respects valid IP rights and avoids unauthorized use of IP that belongs to other people or organizations.

WireCo must own the IP created by its employees as part of their employment.

## YOUR ROLE

- Classify, label, store and share all WireCo data, information and documents in accordance with WireCo's policies, and ensure that access to information and documents is granted only to individuals with a legitimate need.
- Only use or distribute WireCo proprietary information for the benefit of WireCo, and not for personal gain.
- Do not take, access, provide access to, or use any of WireCo's proprietary information or other IP without authorization after leaving WireCo.
- Do not bring, access, keep, share or use a third party's proprietary information, especially proprietary information from a previous employer, without first consulting with and receiving prior approval from your manager or general counsel.
- Do not provide WireCo's proprietary information to a third party without the proper internal approval and the necessary confidentiality agreement with the third party.
- Do not use any source code or software from a third party in any WireCo products or systems or as a tool without obtaining prior approval.
- WireCo's name, logos, brands, patents, copyrights and trademarks are all valuable assets, recognized around the world. Use them consistently in accordance with Company standards, and take steps to protect these assets from misuse by others.



## What You Should Know

IP is among WireCo's most valuable assets.

Every employee creates, uses, accesses or has access to IP every day.

IP includes patents, trade secrets, trademarks, copyrights and designs and helps protect WireCo's inventions, manufacturing processes, brands, business plans, marketing documents and graphics, software, product shapes, proprietary information and many other things.

Proprietary information is information that is undisclosed, for example, not publicly known or generally available, and that is held in confidence.

- Consult with your manager, HR or general counsel if you have any questions or concerns regarding how to identify, handle and protect WireCo's IP.

# WORKING WITH GOVERNMENTS

**RULE TO REMEMBER >>** Never take shortcuts when dealing with governments – be transparent, always comply.

## OUR POLICY

WireCo follows the highest ethical standards in conducting business with governments.

WireCo commits to comply with all contract terms and conditions, laws, and regulations applicable to WireCo when working with governments.

We must be truthful and accurate when dealing with governments.

We maintain controls and procedures that target our government business activities specifically to ensure compliance in this highly regulated environment.

## YOUR ROLE

- Government business is different – do not pursue government business without first engaging WireCo general counsel.
- Before submitting a proposal to a government, review the requirements with all applicable stakeholders and only accept those terms with which WireCo can comply.
- Do not accept internal government information about its selection process nor information about a competitor’s proposal unless the government contracting officer has specifically and lawfully authorized its release.
- After award, perform all contract obligations strictly in accordance with the terms of the agreement. For example, do not make any substitutions for the goods and services to be delivered, or deviate from requirements, without the written approval of the authorized government official.
- Do not offer, promise, make or authorize the giving of anything of value to a government employee that is inconsistent with Corporate and business guidelines.



## Be Aware

**Government Employee** and **Government Official** mean an employee, official, or an elected or appointed member of an executive, legislative, or administrative body of a federal, national, state/provincial, or local government from any country. This includes an employee of any public agency/department, state instrumentality, or State-owned or –controlled enterprise. Outside the U.S., employees of public international organization, candidates for elective office, political party officials, family members of government employees, and members of a royal family ay also be considered Government Officials.

**State-owned or –controlled enterprises** may include, for example, hospitals, oil companies, public utilities, railroads, airlines, TV stations, public universities, sovereign wealth funds, central banks, and pension funds.

# SUPPLIER RELATIONSHIPS

**RULE TO REMEMBER >>** Work only with suppliers that uphold WireCo's values and high integrity standards.

## OUR POLICY

WireCo relationships with suppliers must be based on lawful and fair practices.

WireCo provides suppliers a fair opportunity to earn a share of WireCo's purchasing volume, including small businesses, and businesses owned by the disadvantaged, minorities, women and disabled veterans.

WireCo only does business with suppliers that comply with all applicable legal requirements and WireCo guidelines relating to labor, employment and environment, health and safety and that treat workers and others fairly and with respect.

WireCo, as a business enterprise, promotes respect for human rights within our supply chain.

WireCo safeguards information, including confidential and proprietary information and personal data, of both WireCo and suppliers.

## YOUR ROLE

- Follow the procedures set out in WireCo's Supplier Responsibility Guidelines.
- Protect WireCo's confidential and proprietary information including, where appropriate, with a confidentiality agreement. Also, safeguard any confidential information or personal data that a supplier provides to WireCo.
- Avoid potential conflicts of interest when you select a supplier, and never accept improper gifts or other items of value.
- Follow government acquisition regulations when purchasing materials and services for use in fulfilling government contracts.
- If you observe a suspected human rights violation in WireCo's supply chain, elevate the concern to your manager or general counsel.



## What You Should Know

WireCo's reputation for integrity can be significantly affected by those whom we select to act as our suppliers.

# ANTI-MONEY LAUNDERING

**RULE TO REMEMBER >>** Always know your customer and be alert to possible illegal activity.

## OUR POLICY

WireCo is committed to complying with applicable anti-money laundering, corruption and terrorist financing laws and regulations.

WireCo conducts business only with customers involved in legitimate business activities, with funds derived from legitimate sources.

We adhere to risk-based “Know Your Customer” due diligence process on prospective customers.

WireCo has controls to detect, investigate and report suspicious activity.

We recognize anti-money laundering risks introduced by third party and business partner relationships and mitigate those risks by, for example, performing watch list screening.

## YOUR ROLE

- Collect and understand documentation about **prospective customers**, agents and business partners to ensure that they are involved in legitimate business activities and that their funds come from legitimate sources.
- Follow your **Know Your Customer** procedures and rules on collecting and verifying information from our customers and related parties.
- Follow your **business rules concerning acceptable forms of payment**. Learn the types of payments that have become associated with money laundering (for example, payments on behalf of a customer from an unknown person).
- Be alert and **escalate** any signs of potential money laundering or other illegal activity.



## What You Should Know

**Money laundering** is the process of hiding the proceeds of crime or making the source appear legitimate.

The term **“Customer”** applies to any party contracted to obtain goods, services, credit or who opens an account with WireCo.

# CYBER SECURITY & PRIVACY

**RULE TO REMEMBER >>** Respect privacy rights and protect against cyber risks to WireCo information, networks and products.

## OUR POLICY

WireCo respects individual privacy rights. WireCo is committed to collecting, handling and protecting Personal Information responsibly, and in compliance with applicable privacy and information security laws.

WireCo may transfer Personal Information globally, consistent with applicable law.

WireCo seeks to protect its networks, systems, devices and information in our possession. It is our policy to use information only for legitimate purposes and to maintain appropriate access controls.

## YOUR ROLE

- Limit access to WireCo information to authorized individuals who need it for legitimate business purposes.
- Consult with your manager before implementing new or significantly modified processes that use Personal Information.

- Prevent unauthorized access, accidental loss, disclosure or destruction of WireCo information.
- Use only WireCo-approved systems and tools for storage, transmission and backup of WireCo information. Do not use personal email, unapproved devices or software to conduct WireCo business. All data should be securely stored exclusively on pre-approved WireCo systems. Any external applications (SaaS) must receive prior approval from the VP of IT and the Legal Department. The use of systems such as Dropbox, Google Drive or any similar external storage services is also prohibited without prior approval.
- When posting information online, do not disclose Personal Information, trade secrets, proprietary or other commercially sensitive information.
- Know the signs of phishing and recognize efforts to improperly acquire WireCo information.



## Be Aware

**Personal Information** is any information relating to a directly or indirectly identifiable person (or in some cases, a company); examples include name, address, email, phone, national identifier and credit card number.

Also, Cyber Security & Privacy incidents can happen in a number of ways. Report any risks or incidents to your manager or site leadership.

- Possible loss or theft of data, including lost laptops and other computing equipment.
  - Loss, misuse or improper access to data.
  - Security issues involving a WireCo product or system.
- Secure physical copies and storage areas.
  - Use strong passwords; don't share your password with anyone.



# KEY QUESTIONS OF INTEGRITY

This Code is not a substitute for your good judgment, and it cannot cover every conceivable situation. You should be alert to signs that you or your colleagues are in an integrity gray area and ask yourself three simple questions if you have any doubts about what you should do.

## 01 >>

How would this decision look to others within WireCo and externally?

## 02 >>

Am I willing to be held accountable for this decision?

## 03 >>

Is this consistent with WireCo's Code of Conduct?

### **Remember:**

Act if you see an issue.  
Ask if you're not sure.



**WIRECO**

*A World Ahead*