

CABLES FOR A MOVING WORLD



TRATOS
CORPORATE SOCIAL
RESPONSABILITY

Foreword

Tratos's Corporate Social Responsibility (CSR) outlines the principles and standards that Tratos expects and requires all Tratos Group employees and directors to observe and uphold.

The Tratos Board of Directors, in consultation with the Executive Committee, have established the CSR and will continue to review the document as it sees fit. All employees will be informed of any changes to the CSR. The CSR is indicative of the importance Management attaches to the Group conducting business responsibly and with integrity.

The principles and standards detailed in the CSR are to characterise all the Group's relationships with customers, colleagues, investors, suppliers, business partners, regulatory authorities and the general public. As such, the CSR underpins all Tratos guidelines and statements pertaining to how Tratos employees conduct themselves.

Tratos personnel create the Tratos culture, its identity and its reputation. By respecting the CSR, Tratos personnel demonstrate their commitment to transparency and mutual respect that we believe must be inherent in our operations and across interactions with all our stakeholders.

Compliance with the CSR is compulsory. All Tratos employees are required to read and fully understand the CSR and its implications. Poor knowledge of, or ignorance of the CSR will be considered inadequate defence in the event of violation.

While the CSR may not provide guidance for every eventuality, Tratos expects its employees to exercise sound judgment. In essence, this requires that all Tratos employees act in the interests of the Group, our customers and our shareholders before personal interest.

The Board of Directors and the Executive Committee fully support the CSR and its implementation throughout the Group



Laws and regulations

All Tratos employees and Directors are required to comply with the laws and regulations of the jurisdictions in which the Group operates.

Tratos has an open and cooperative relationship with regulators and other relevant authorities.

The Group operates fairly, honestly and in good faith with customers, business partners, the wider community, competitors, and with each other. Tratos rejects all unethical or unfair practices and use legal and ethical methods in the collection of competitive information.

Tratos undertakes appropriate due diligence and monitoring to assist in the identification of illegal or unfair practice. If such activities are discovered, Management are to be swiftly alerted and are expected to then take appropriate action.

Tratos does not tolerate corruption or bribery in any form. This extends to 'facilitation' payments. Neither does Tratos provide or accept improper inducements in its relationships with others.

Tratos requires that employees understand the policies applicable to their activities when offering products or services, visiting, or otherwise soliciting business from customers outside our home jurisdictions and ensure such policies are enforced.

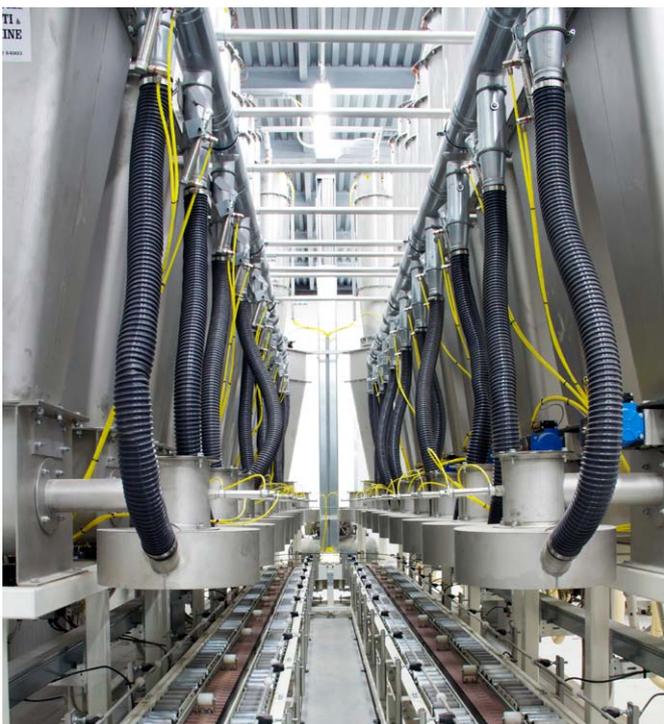
Ethical conduct

Tratos actively ensures that the highest ethical standards characterise all our activities and decisions around the world.

The Group's business decisions are always in compliance with laws and regulations in relevant jurisdictions and meet the CSR's requirements of openness and integrity.

Tratos is aware of the potential for conflicts of interest, and the Group takes all reasonable measures to identify and address such situations as they arise.

Tratos's success has been and will continue to be built on developing close relationships with our customers. Tratos is committed to treating our customers fairly and with respect.



Disclosure

Tratos provides regular, accurate and easily understandable information about the Group to shareholders, our markets, the relevant authorities and the general public.

The Group makes true, timely and clear disclosure in reports and other communications to regulatory authorities and the general public in accordance with applicable legal and regulatory requirements.

Independent external auditors, who have direct access to the Chairman of the Audit Committee, audit Tratos's financial statements ensuring compliance with applicable Generally Accepted Accounting Principles and International Financial Reporting Standards. Furthermore, the Audit Committee is committed to ensuring the independence of the Internal Audit function.



Client confidentiality

Tratos handles information with the utmost care. The Group upholds client confidentiality and goes to great lengths to protect client information.

Tratos guarantees the confidentiality of any information entrusted to us by our customers, with the exception of when disclosure of such information is authorised by the customer or required by applicable laws, rules and regulations.

The Group exercises due care when receiving, handling and storing sensitive information from customers and other sources, and adheres to the highest standards of data security to prevent unauthorised use, access, modification or destruction.

The Tratos working environment

Tratos provides equal employment and advancement opportunities for all individuals regardless of race, ethnicity, gender, national origin, age, disability, sexual orientation or religion. The Group is committed to developing and sustaining a diverse workplace. Tratos's staff are drawn from several countries and from a wide variety of backgrounds.

Tratos's open, non-hierarchical working environment encourages the free exchange of ideas and mutual respect between individuals that underpin the Group's unique capabilities as a leading engineering group.

The Group does not tolerate discrimination, bullying or harassment in any form. Any staff member with such concerns is encouraged to report these so appropriate steps can be taken.

Tratos ensures that intellectual property, commercially sensitive, or confidential information is properly handled to protect the interests of the Group and our customers, and to ensure compliance with regulatory and legal requirements.

Health and safety standards

Tratos is fully committed to providing a healthy and safe working environment for all staff.

The Group is responsible for maintaining standards in the workplace and to ensure that conditions meet all relevant applicable health and safety rules and practices.

The environment

Tratos is committed to conducting business in ways that reduce the Group's environmental impact. Tratos is dedicated to improving its environmental performance and its use of resources. For example, Tratos Group has got ISO 14001.

Human rights

Tratos supports and respects human rights wherever possible. The Group respects and supports human rights through our human resources policies and practices.

Tratos aims to promote the responsible use of our products and services by taking human rights standards into account when vetting prospective clients and executing transactions.

We consider the business practices of significant suppliers in light of human rights standards and integrate relevant aspects into our contractual relationships with them.



Tratos Cavi Spa

Via Stadio, 2
52036 - Pieve Santo Stefano
Arezzo - ITALY
Tel: +39 0575 7941
Fax: +39 0575 794246
e-mail: info@tratos.it

Tratos Ltd - United Kingdom

Park Road - Holmewood Industrial Park
Holmewood - Chesterfield - S42 5UW
United Kingdom
Tel: +44 1246 858000 - Fax: +44 1246 858001
e-mail: info@tratos.co.uk
web: www.tratos.co.uk

Tratos Ltd - Germany

Alter Bentheimer Weg 4
48465 - Schüttorf - Germany
Tel: +49 5923 969966
Fax: +49 5923 969967
e-mail: info@tratoscavi.de

Tratos Cavi Iberica S.L

Bloque 6 - 1ºD - Alcobendas
28109 Madrid - Spain
Tel: + 34 9162 55887
e-mail: info@tratos.com.es

Tratos Cavi SpA - China Office

Unit 3 - No.879 - Shenfu Road
Xinzhuang Industrial Zone
Shanghai - China (201108)
e-mail info.china@tratos.it