



THE HALTON CODE OF CONDUCT

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Oy Halton Group Ltd (“Halton”) specializes in indoor climate products, services and solutions. Halton’s goal is to create comfortable and safe indoor environments that have energy-efficient and sustainable life cycle.

We aim at growing and conducting long-term profitable business in a responsible manner. Since we operate in the international market, we also take into account international agreements, commitments and recommendations relevant to our operations. The most important of them are:

- UN Universal Declaration of Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- ILO Declaration on Fundamental Principles and Rights at Work and other relevant ILO Conventions

We endorse the United Nations Global Compact strategic initiative for sustainable business practices and support the Global Compact’s Ten Principles which are derived from the areas of human rights, labour, environment and anti-corruption.

This Code of Conduct (“Code”) sets forth the most important principles and practices guiding Halton and its employees in all of their actions. As Halton’s reputation is reliant on the conduct of its employees, each Halton employee is expected to comply with the requirements set forth in this Code without exception.

Halton’s business partners are required to endorse the principles of this Code as part of their contractual relationship with Halton. We have a separate Supplier Code of Conduct in which we require and strive to ensure that our direct and indirect suppliers and subcontractors throughout our supply chain meet the standards and requirements set forth in the Supplier Code of Conduct.

This Code has been approved by Halton’s Board of Directors on October 23rd, 2025.

Compliance with Laws

We are committed to comply with all applicable laws and regulations affecting our business operations. Where differences exist between local laws, regulations or market practices and this Code, Halton strives to apply which ever sets the highest standard while maintaining compliance with any applicable laws and regulations and acting in a responsible manner. Our ambition is to be a good corporate citizen and let our commitment to integrity show through in all our actions. Each of us has to comply with the applicable laws, regulations and agreements and supervisors are responsible for the required training and for monitoring compliance together with our legal advisors.

Human Rights

We respect human rights as defined in the United Nations' Universal Declaration of Human Rights and we seek to promote them in our conduct and practices. In particular, we refrain from using any form of forced or child labour and insist the same from our business partners. We endorse the International Labour Organization's Declaration of Fundamental Principles and Rights at Work. We are committed to conducting thorough due diligence to identify, prevent, and mitigate adverse impacts on human rights. In our due diligence process we include regular risk assessments across our operations and value chain, implementing corrective actions and monitoring their effectiveness as well as reporting on our due diligence activities and outcomes.

Employees

We comply with applicable laws, industry standards and collective bargaining agreements on working hours, including overtime and overtime compensation, to ensure adequate time for rest and leisure. We are committed to providing a safe, healthy and fair working environment and require the same from our business partners.

We value innovation and curiosity and encourage the professional and personal growth of our employees. We are dedicated to fostering a diverse, equitable, and inclusive workplace. We do not accept any form of discrimination, harassment or other offensive or inappropriate behaviour from or towards our employees. We strive to create an inclusive culture where all employees feel valued and respected. We also regularly monitor the development by measuring employee wellbeing and taking appropriate actions based on the results.



Anti-Corruption

We maintain a zero-tolerance approach towards all forms of corruption and abide by the anti-corruption laws affecting our business operations. Our reputation as an honest and reliable company is of paramount importance to us, and each employee is expected to safeguard this reputation. The monetary value of any gifts, entertainment or other types of hospitality offered to clients or business partners, or received by Halton's employees, shall be reasonable and appropriate under the circumstances. Making any offers to public officials or other business partners with an intent to improperly influence their decisions is strictly prohibited. We avoid and mitigate situations which create or have an appearance of a conflict of interest. We do not support political parties, organizations or individual candidates. Prior to entering into a legally binding agreement, our Sales are expected to ensure customer compliance through our Sales check list. More detailed employee guidance is given in "Halton Way" document.operations.



Use of Halton's Funds and Assets

Halton's funds and assets are to be used for the benefit of Halton only, and they may not be used for any unlawful or improper purpose. Employees shall avoid and report events or circumstances where their personal interests may be in direct or indirect conflict with the interests of Halton. Such scenarios could include a situation where a Halton employee holds a financial interest in a competing entity or in a business partner other than publicly listed company. Halton's investment decisions are guided by our commitment to sustainability and ethical business practices.



Competition

We are committed to promoting fair competition and complying with all applicable competition and antitrust laws. We also expect the same from our competitors, suppliers, customers and business partners, and encourage fair competition worldwide. We compete fairly and ethically in all our business dealings in a transparent manner by ensuring that all agreements with our contractual parties are in compliance with applicable competition or antitrust laws. We do not conduct any business practices that could be perceived as anti-competitive including without limitation cartels and abuse of dominant position within any relevant market. We also provide training to employees on competition laws and ethical business practices.



Environment

The environment is a key stakeholder for us, and we comply with all generally recognised international environmental standards and often seek to exceed those standards. In addition, our products and services are guided by our set of Sustainable Design Principles, recognising that our main environmental contribution comes from our sustainable solutions and new technologies that we can provide to our customers. We are focusing on keeping production emissions as low as possible and we have invested significantly in production facilities' energy efficiency and renewable energy sources.

We are committed to mitigating climate change and aligning our operations with the goals of the Paris Agreement supported by a Climate Transition Plan.



Stakeholder Engagement

We believe in the importance of engaging with our stakeholders to build trust and ensure informed decision-making. Our approach includes regular consultations with employees, customers, suppliers, and community members. We practice transparent communication of our sustainability goals, progress, and challenges and also provide channels for stakeholders to share their feedback and concerns.

Under our Supplier Code of Conduct, we require our suppliers to adhere to the same high standards of human rights and environmental protection. This includes conducting regular audits of our suppliers, providing training and support to help suppliers meet our standards and terminating relationships with suppliers who fail to comply with our requirements.



Implementation and Monitoring of this Code

We implement this Code by training our employees and requiring periodical acknowledgements of their compliance with this Code. Further, compliance with this Code is continuously monitored by business area / regional heads and immediate supervisors. If any Halton employee becomes aware of or suspects a violation of this Code, they are required to report their concerns either to their unit management or through the internal communication channel (Halton Fair Play Forum) at <https://www.firstwhistle.fi/halton> (anonymous reporting available). Violating this Code will lead to appropriate corrective action, up to and including the termination of employment or business relationship.

ABOUT US

Halton Group specializes in indoor environment solutions, ranging from public and commercial buildings to foodservice facilities. Founded in Finland in 1969, Halton operates today in over 35 countries around the world, with annual sales of ca. 316 MEUR and over 1900 employees. The company has production facilities in Brazil, Canada, China, France, Finland, Germany, Malaysia, the United Kingdom, and the USA.