



THE HALTON'S SUPPLIER CODE OF CONDUCT

Enabling Wellbeing

Halton

The Halton Supplier's Code of Conduct

Oy Halton Group Ltd. and its affiliates ("Halton") are committed to high ethical standards and sustainable business practices. This Supplier Code of Conduct ("Code") sets out the minimum expectations of Halton for all of its suppliers, partners, distributors, and representatives in terms of such practices. This code reflects Halton's values and aligns with international standards, including the UN Global Compact, ILO Conventions, and OECD Guidelines.

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



Compliance with Laws and Regulations

Suppliers shall comply with all applicable international and national laws, directives, rules and regulations. Where differences exist between applicable laws or regulations, this Code and the Supplier's Code of Conduct, the more stringent requirements shall apply.



Human Rights and Labor Conditions

Suppliers shall respect internationally recognized human rights and ensure fair labor conditions, including:

- No use of forced, bonded, or child labour (child defined as a person under the minimum legally permitted working age).
- No discrimination or harassment based on race, colour, age, gender, sexual orientation, ethnic origin, disability, pregnancy, religion, political affiliation, union membership, or marital status.
- Respect for employees' freedom of association and collective bargaining.
- Compliance with laws on working hours, wages, and compensation.
- No retention of IDs, no recruitment fees (employer pays), or no worker-paid deposits
- Human disciplinary practices, equal pay for equal work, and similar expectations for responsible labour agencies/contractors.
- Suppliers shall comply with legal wage requirements and work progressively toward paying a living wage.



Occupational Health and Safety

Suppliers shall provide a safe and healthy workplace and working environment, including:

- Setting up procedures for preventing and managing emergencies and occupational hazards.
- Providing access to potable water, sanitary facilities, adequate ventilation, and lighting.
- Complying with all applicable health and safety laws and relevant standards.



Ethical Business Practices and Anti-Corruption

Suppliers shall:

- Engage only in legitimate, ethical, and transparent business practices.
- Record all business dealings accurately.
- Prohibit all forms of corruption, extortion, bribery, and improper gifts or entertainment.
- Not offer or accept gifts, hospitality, or other benefits that could be perceived as influencing business decisions; only occasional business courtesies with nominal value without trying to gain improper advantage. All potential conflicts must be disclosed to Halton in advance.
- Promptly report any potential conflicts of interest to Halton.
- Monitor and protect Halton's intellectual property rights and confidential information provided by Halton and its business partners with appropriate safeguards and inform Halton about any potential infringements immediately.



Environmental Responsibility

Suppliers shall:

- Comply with all applicable environmental laws regulations.
- Monitor and minimize waste, emissions, and use of finite resources (energy, water, raw materials).
- Support Halton's climate goals, including e.g., measuring and annually reporting Scope 1–2, and material Scope 3 categories; moreover, suppliers are encouraged to set climate targets for the near term and net zero aligned with the Paris Agreement.
- Identify and manage hazardous substances in accordance with applicable regulatory requirements, and actively work to eliminate substances of very high concern and PFAS wherever possible.



Trade Compliance & Fair Competition

Suppliers must comply with all applicable trade, and export control laws and regulations, as well as all sanctions imposed by European Union or international organizations applying to Halton or suppliers.

Suppliers shall:

- Not interact with sanctioned parties or operate within or with restricted countries,
- Screen transactions and partners for compliance
- Maintain accurate records
- Promptly notify Halton of any potential or actual breaches of sanctions.

Suppliers shall comply with all applicable competition and antitrust laws and avoid anti-competitive practices, including cartels and abuse of dominant position.



Anti Money Laundering & Tax Evasion Facilitation

Suppliers shall comply with all anti-money laundering, counter-terrorist financing, and anti-tax evasion laws and regulations.

Suppliers shall:

- Maintain risk-based controls
- Conduct due diligence on the compliance by intermediaries
- Ensure transparent payments
- Promptly report any suspicious activity and potential or actual breaches to Halton.



Information Security & Data Protection

Suppliers shall implement appropriate technical and organizational measures consistent with recognized standards and regulation (e.g., ISO/IEC 27001 controls and GDPR) to safeguard Halton information and personal data. Suppliers shall promptly (within 72 hours) notify Halton of any suspected or actual information security or personal data incident affecting Halton data and cooperate fully in investigation and remediation.



Management Systems and Continuous Improvement

Suppliers shall maintain appropriate management systems to:

- Identify and mitigate business risks.
- Have in place effective risk management policies, quality control measures, disaster recovery plans and appropriate back-up procedures for information and data,
- Maintain in force normally expected insurance protection with credible insurance companies, including without limitation liability insurances,
- Ensure compliance with this Code and all applicable laws and regulations.
- Continuously improve ethical, environmental, and social performance of the supplier.



Supply Chain Responsibility

Suppliers shall:

- Ensure that their own suppliers and subcontractors comply with this Code.
- Take corrective action at their own cost, without delay, in case of any of the suppliers in the supply chain is not complying with this Code
- Obtain confirmation of compliance from such sub-suppliers and subcontractors if requested.
- Implement responsible sourcing practices for minerals (tin, tantalum, tungsten, gold) and prohibit use of conflict minerals.
- Suppliers shall transfer these requirements contractually to sub suppliers and sub-contractors, verify adherence for high-risk tiers, and on request provide evidence of sub tier due diligence.
- Upon request of Halton, Suppliers shall complete a supplier assessment , or share a similar assessment with Halton, and implement corrective action plans for identified risks.



Monitoring, Audits, and Corrective Action

Suppliers shall monitor compliance with this Code and provide Halton with information or documentation upon request.

Halton or its authorized representatives may conduct compliance monitoring, including on-site audits.

In the event of a violation, suppliers must present and implement a corrective action plan within a timeframe specified by Halton.

Halton may discontinue relationships with suppliers who fail to comply with this Code.



Reporting Concerns

Concerns can be reported at any time via Halton's Fair Play Forum: <https://www.firstwhistle.fi/halton> (anonymous reporting available). Halton prohibits retaliation against anyone who raises concerns in good faith.

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.