

1 November 2017

The Halton Code of Conduct

Halton Group (“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, labor, 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 that our suppliers and subcontractors 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 December 14th, 2016.

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Halton's Code of Conduct

1. Compliance with Laws

We comply with all applicable laws and regulations in the countries in which we operate. Where differences exist between local laws, regulations, customs or norms and this Code, Halton strives to apply which ever sets the highest standard. In addition to following formal legal norms, we make no compromise in 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 must know the laws, regulations and agreements concerning own work. Supervisors are responsible for the required training and for monitoring compliance.

2. 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 labor and insist on the same from our business partners. We endorse the International Labour Organization's Declaration of Fundamental Principles and Rights at Work.

3. Employees

We value innovation and curiosity and encourage the professional and personal growth of our employees. We recognize the value of diversity and do not accept any form of discrimination, harassment or other offensive or inappropriate behavior from or towards our employees. We are committed to providing a safe working environment and require the same from our business partners.

4. Anti-Corruption

We maintain a zero tolerance approach towards all forms of corruption and abide by the anti-corruption laws applicable in the countries in which we operate. 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, must 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 do not support political parties, organizations or individual candidates. More detailed employee guidance is given in "Halton Way" document.

5. 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 must avoid and report events or circumstances where their personal interests may be in direct or indirect conflict with the

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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.

6. Competition

We recognize the importance of healthy competition in the marketplace and encourage fair competition worldwide. We comply with all laws and regulations concerning competition and expect the same from our competitors and business partners. Business practices we renounce include participating in cartels, abusing one's dominant position in the market place and fixing prices with competitors.

7. Environment

Our investment in and commitment to sustainable business practices demonstrates our ambition to be a good corporate citizen. The environment is a key stakeholder for us, and we comply with all generally accepted international environmental standards and often seek to exceed those standards. In addition, we constantly seek to include a sustainability element in our products and services.

8. Implementation and Monitoring

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 (fairplayforum@halton.com) which provides anonymity. Violating this Code will lead to appropriate corrective action, up to and including the termination of employment or business relationship.