Halton's Supplier Code of Conduct

Oy Halton Group Ltd. and its affiliates ("Halton") are committed to high ethical standards and encourage a culture of sustainability amongst its suppliers, partners, distributors and representatives. This Supplier Code of Conduct outlines the minimum expectations regarding ethical principles and business practices for all Halton's suppliers.

- 1. **Compliance with laws and regulations** The Supplier will abide by all applicable international and national laws, directives and regulations.
- 2. Respect for human rights and labor conditions The Supplier will respect internationally recognized human rights and ensure fair labor conditions. The Supplier will refrain from any harassment and discrimination which is based on race, color, age, gender, sexual orientation, ethnic origin, disability, pregnancy, religion, political affiliation, union membership or marital status in all employment practices, and will respect the employees' freedom of association and collective bargaining. The Supplier will not use forced or child labor of any kind (the term "child" refers here to persons under the minimum legal working age as determined by local laws and regulations). The Supplier will also comply with the applicable laws and regulations regarding maximum working hours, minimum wage and other elements of compensation.
- 3. Endorsement of occupational health and safety standards The Supplier will provide its employees a healthy and safe place to work ensuring, at a minimum, that adequate procedures are established for preventing and managing emergencies and occupational hazards, and that employees have reasonable access to potable water, sanitary facilities, adequate ventilation and lighting.
- 4. Adherence to ethical standards The Supplier will engage in only legitimate, ethical and transparent business practices and record all business dealings accurately. The Supplier will adhere to all laws governing competitive practices, and will not engage



in any kind of corruption, extortion, bribery or offering of extensive gifts or entertainment to Halton associates. Any potential conflict of interest must be promptly reported to Halton. The Supplier must also protect the intellectual property rights and any confidential information provided by Halton and its business partners with appropriate safeguards.

- 5. Commitment to environmental responsibility The Supplier is committed to environmental protection and will endorse efforts to monitor and minimize waste, emissions, and the use of finite resources (including energy, water and raw materials). Furthermore, the Supplier will adhere to applicable laws, regulations and Halton requirements regarding prohibition or restriction of specific substances.
- 6. Commitment to management The Supplier will maintain management system(s) to ensure sufficient identification and mitigation of business risks, and to ensure compliance with applicable laws, regulations and Halton's requirements regarding this Code, the Supplier's operations and products. The Supplier will also strive to continuously improve the ethical performance specified in this Code and the competence to provide Halton reliable, innovative and cost-effective products and services.
- 7. Application to sub-suppliers The Supplier will ensure that its own supplier(s) comply with this Code, and obtain confirmation of compliance from sub-suppliers if requested. If parts or products supplied to Halton by the Supplier contain tin, tantalum, tungsten or gold, the Supplier must ensure responsible sourcing of these materials by implementing a Conflict Minerals policy that prohibits the purchase and use of minerals financing conflicts.
- 8. **Monitoring of compliance** The Supplier will monitor the compliance with this Code of Conduct, and immediately provide Halton with information on any activities, which might violate the compliance. The Supplier will also provide Halton with documentation regarding any of the elements listed in this Code of Conduct on



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request, and allow Halton or person(s) authorized by Halton to perform compliance monitoring, including on-site audits at a mutually agreed date and time.

9. Event of violation In the event of violation, the Supplier must present Halton with a corrective action plan, which must be implemented and documented within a specific time frame. The Supplier will acknowledge that Halton may discontinue its relationship with suppliers who fail to comply with this Code of Conduct. If a Supplier or any other persons or groups have reason to believe, that any of the aspects listed in the Halton Supplier Code of Conduct have been violated, this may be reported strictly confidentially to:

fairplayforum@halton.com

Halton

Fair play forum

Corporate Communications

Esterinportti 2

FI-00240 Helsinki

Finland

The Supplier Code of Conduct reflects Halton's values and the Halton Code of Conduct, and is based on principles created by the International Labor Organization (ILO) and the United Nations Global Compact initiative.

