

PARTNER CODE OF CONDUCT

Effective as of 1 January 2022

Filtech Nederland BV, Filtech France SAS and Filtech Swiss SA, following referred as Filtech, are committed to creating energy-efficient solutions for a healthy and comfortable indoor climate. Our brands are synonymous with innovation, design and reliability. Over the years, Filtech has built a reputation as a reliable, secure and successful company and is one of the most respected companies in the world.

In conducting our business, Filtech is committed to implementing best practices, particularly in terms of ethics, social responsibility and environmental protection, and pays close attention to compliance with applicable laws, regulations, national and international conventions. All Filtech employees strictly and unreservedly apply the provisions of this Code of Conduct.

Filtech therefore expects its partners to show the same respect for the applicable legislation and ethical principles in the management of their own businesses. The term "partners" refers to both our service providers and our customers. Their level of commitment is a determining factor in the Filtech's selection of partners.

We therefore ask our Partners to comply strictly and unreservedly with the principles set out in this Code of Conduct, and to ensure that they are respected, both within their own companies and by their own Partners, whether they are subcontractors or suppliers.

The Partner authorises Filtech to monitor compliance with these principles and to conduct compliance audits at its premises and/or those of its own suppliers and subcontractors. In this context, it undertakes to cooperate fully, providing all necessary information and facilitating access for the persons in charge of the audit. The Partner undertakes to improve or correct any deficiencies detected.

In the event of a breach of the principles of this code of conduct, refusal to cooperate during an inspection, or failure to correct any deficiencies detected, either by the Partner itself or by its partners, Filtech may terminate its business relationship with the Partner without notice and without prejudice to any damages and other rights or remedies that the Filtech may exercise.

The principles that the Partner undertakes to comply with are as follows:

- **RESPECT FOR EMPLOYEE RIGHTS**
- **RESPECT FOR HEALTH AND SAFETY AT WORK**
- **RESPECT FOR ETHICS**
- **ENVIRONMENTAL COMMITMENT**

➤ **RESPECT FOR EMPLOYEE RIGHTS**

Filtech requires all Partners to demonstrate exemplary behaviour in terms of social responsibility. In particular, all Partners undertake to comply with the rules set out below:

- **Absence and combating of child labour:** the employment of children under the age of 16 is strictly prohibited. In countries where local legislation stipulates a higher working age or extends compulsory schooling beyond the age of 16, the higher age applies. Any type of work that is likely to compromise the health, safety or morals of children must not be performed by anyone under the age of 18. Our Partners undertake to take all measures to combat child labour.
- **Absence and combating forced labour:** the use of forced labour, slavery, servitude or human trafficking, as well as the retention of identity documents or work permits, the requirement for workers to provide any kind of security deposit, or the use of any other form of coercion, are strictly prohibited. All workers have the right to freely accept or leave a job. Partners may not force workers to work to repay a debt owed to them or to a third party. Our Partners undertake to take all measures to combat forced labour.
- **Absence and combating illegal, clandestine and undeclared work:** our Partners must comply with all applicable regulations to eliminate and prevent illegal, clandestine and undeclared work. They undertake to take all measures to combat illegal, clandestine or undeclared work.

- **Absence of harassment and other abuse:** we expect our Partners to treat their workers with respect and dignity. Our Partners shall not tolerate or engage in any form of corporal punishment, physical, sexual, verbal or psychological harassment, or any other form of abuse. Our Partners undertake to take all measures to combat all forms of harassment and abuse.
- **Non-discrimination:** We expect our Partners to treat all workers equally and fairly. Our Partners may not discriminate in any way – particularly with regard to pay, hiring, access to training, promotion, maternity protection and dismissal – based on criteria such as gender, race or ethnic origin, religion, age, disability, sexual orientation, political affiliation, trade union membership, nationality, gender identity or social origin. Our Partners undertake to take all measures to combat any form of discrimination.
- **Payment of wages and benefits:** our Partners must pay at least a regular monthly wage, remunerate overtime at the legal rate, and comply with all legal requirements relating to employee benefits. Where there is no legal minimum wage or overtime rate in the country concerned, the Partner must ensure that wages are at least equal to the average minimum for the relevant industry and that overtime pay is at least equal to the usual hourly rate. No deductions from wages shall be made for disciplinary reasons. We expect our Partners to guarantee all workers the benefits provided for in any collective agreement, company agreement and any other applicable individual or collective agreement.
- **Compliance with working hours:** With regard to working hours, our Partners must comply with applicable local laws and regulations, which may not exceed the maximums set by internationally recognised standards such as those of the International Labour Organisation. Our Partners may not impose excessive overtime. The total number of hours worked per week, including overtime, may not exceed legal limits. Workers are entitled to the minimum number of days off established by applicable legislation and must have at least one day off per seven-day period.
- **Respect for freedom of association:** our Partners recognise and respect the right of workers to bargain collectively and to form or join trade unions of their choice without penalty, discrimination or harassment.

➤ RESPECT FOR HEALTH AND SAFETY AT WORK

Filtech expects its Partners to guarantee health, safety and hygiene at work and to take all necessary measures to maintain a high level of safety at work at all times.

- Our Partners must provide their workers with a safe and healthy working environment.
- They undertake to take all necessary measures to ensure health and safety at work, complying at all times with all applicable local and international regulations and laws in this regard.
- They establish procedures for identifying and preventing risks to the health, hygiene and safety of personnel.
- They undertake to inform Filtech of any dangers or risks associated with their products or interventions. They also immediately inform Filtech of any incidents that occur.

➤ ETHICAL CONDUCT

Filtech requires its Partners to behave in an exemplary manner in terms of ethics and professional integrity. Partners therefore undertake to:

- **Prohibit all forms of corruption:** Filtech has a zero-tolerance policy on corruption and influence peddling. We expect our Partners to comply with all applicable laws on corruption and to take appropriate measures to prevent, detect and punish any acts directly or indirectly related to corruption or influence peddling within the scope of their activities.
- **Preventing conflicts of interest:** we require our Partners to comply with all applicable conflict of interest legislation and to endeavour to prevent situations arising that could create a conflict of interest in the context of their collaboration with Filtech.
- **Prohibition of money laundering:** our Partners undertake to take all appropriate measures to prevent their operations from being used as a vehicle for money laundering (when action is taken to conceal the true origin of sums or assets linked to criminal activities).
- **Respect for competition:** our Partners undertake to comply with the competition law applicable in the countries in which they operate. This includes, in particular, the prohibition of abuse of a dominant position, concerted practices or illegal agreements between competitors.
- **Respect for confidentiality:** our Partners undertake to take all necessary measures to ensure the confidentiality of professional secrets and other non-public information communicated in the course of their business relationship with Filtech.
- **Prevention of insider trading:** our Partners must comply with applicable insider trading laws and refrain from selling or purchasing, directly or indirectly, securities of Filtech companies or related financial instruments based on inside information.
- **Personal data protection:** we require our Partners to comply with applicable laws and regulations regarding personal data protection, in particular the European General Data Protection Regulation.

- **Compliance with customs regulations:** our Partners must comply with applicable customs legislation, including with regard to imports and the prohibition of transshipment of goods in the country of import.
- **Compliance with trade restrictions and international sanctions:** we require our Partners to comply with trade restrictions and international sanctions, taking into account any changes thereto, as well as laws and regulations relating to export controls. They shall refrain from selling to countries under embargo.
- **Limitation on gifts and invitations:** our Partners shall refrain from any form of corruption. Gifts and invitations may constitute acceptable expressions of courtesy in the context of established business relationships if their scope and value are limited, if they are offered openly and transparently, if local law or custom permits such practice, if they are intended to reflect consideration and recognition, and if they are not offered in expectation of something in return. In all other cases, such practices may fall under corruption provisions or other local legal rules and are strictly prohibited.
- **Protection of intellectual property rights:** our Partners undertake to respect the intellectual property rights of Filtech and refrain from any infringement or parasitic acts.
- **Public statements:** we expect our Partners to exercise the utmost caution when making public statements, particularly on the internet and social media. They shall ensure that their statements are not attributed to Filtech and comply with the employee's commitment to confidentiality and professional secrecy.
- **Transparency of information:** our Partners must provide clear and accurate information about the methods and resources used, production sites and characteristics of the products or services provided, and must refrain from making any misleading claims.

➤ ENVIRONMENTAL COMMITMENT

Our Partners are committed to complying with local and international environmental regulations and standards, and to implementing action plans aimed at reducing the environmental impact of their activities, in particular through the use of green technologies. These action plans focus in particular on:

- Reducing the impact of their activities on ecosystems and biodiversity
- Optimising their consumption of natural resources and energy,
- Reducing their emissions of greenhouse gases, pollutants and volatile organic compounds,
- Reducing the quantities of waste produced and implementing recycling and recovery solutions. They identify and quantify the significant environmental issues associated with their activities, products and services.
- Implementing traceability for raw materials, materials and components required to provide services or goods.
- Monitoring and optimising/reducing their consumption of water and energy, as well as greenhouse gases.
- Adopting a "total life cycle" approach to product design, striving to reduce the environmental impact of its activities and products.
- The labelling and communication of all relevant information when hazardous products are used.