

Code of Conduct for Business Partners of the Hawa Group

PREAMBLE

This Code of Conduct shall apply for all suppliers, dealers and resellers (hereinafter referred to as **Business Partners**) of Hawa Holding AG, Hawa Sliding Solutions AG and any future members of the Hawa Group (hereinafter collectively referred to as the **Hawa Group**).

The Hawa Group runs its business based on the values of integrity and fairness and expects the same from its Business Partners. Sustainability is an integral part of the Hawa Group's strategy. Our actions and measures contribute to a more sustainable planet. This Code of Conduct intends to ensure that our relationships with Business Partners reflect and support the same high ethical and sustainable standards.

The directives listed in this document describe the Hawa Group's approach to law-abiding conduct, integrity, fair competitive practices, social responsibility towards employees, and the environment. This document is an integral component of any contracts concluded between Hawa Group companies and their Business Partners. Hawa Group companies expect their Business Partners and their employees to adhere to these directives and to engage in a continuous dialogue to promote compliance with these standards in their own operations and supply chains.

1 General directives

Business Partners undertake to meet their social, civil, and ecological responsibilities in all of their corporate activities. Business Partners undertake to adhere to all local, national and international laws that apply to their Business Partners and their area of activity in all commercial transactions and decisions. This Code of Conduct represents a minimum standard. Insofar as the applicable law contains any provisions that go beyond the minimum standards in this Code of Conduct, Business Partners undertake to adhere to any such provision.

2 Integrity when dealing with official authorities and business partners

Business Partners interacting with the Hawa Group must ensure that there is a clear separation between commercial and personal interests. Actions and decisions must not be influenced by any factors not related to the matter in question or any personal interests. In particular, Business Partners must adhere strictly to any applicable legislation related to corruption and bribery. The following principles also apply independently to any applicable legislation:

The granting of personal benefits to public officers is prohibited.

During the course of day-to-day business, Business Partners are not permitted to offer, demand or grant any gifts, payments, invitations or services with the intention to influence a business relationship in an unlawful manner.

Business Partners are not permitted to grant any personal benefits exceeding a minor value to Hawa Group employees. Business Partners are generally prohibited from granting benefits to Hawa Group employees in direct relation to a procurement or decision-making process.

3 Fair competitive practices

Business Partners observe fair competitive practices and adhere to the applicable provisions related to competition law.

Regardless of any local legislation, Business Partners are prohibited from colluding with competitors or taking part in other similar activities which involve prices being arranged or sales regions and customers being distributed between competitors.

Business Partners must also refrain from entering into agreements with any of their suppliers or customers that require products to be sold on for an agreed minimum or fixed price. Any agreements containing provisions that restrict sales activities to a particular group of customers or customers in a particular region must be checked for legality under competition law. Agreements found to be unlawful must be rejected.

It is often very difficult to determine what is and is not permitted under competition law without possessing the relevant expert knowledge. Business Partners must therefore ensure that their employees have access to a qualified contact person for such issues, either directly or via the management team.

4 Social responsibility

a. Observance of human rights

- b.** Business Partners shall treat their employees with dignity, fairness and respect and commit to a safe working environment that is free from and offers protection against human trafficking and slavery, including forced labour. Business Partners undertake to support the protection and observance of fundamental human rights as set out in the United Nations Universal Declaration of Human Rights. **No discrimination**

Business Partners undertake to treat employees with dignity, fairness and respect during the recruitment process and during their professional activities, not to discriminate against employees and to take a firm stance against any form of discrimination. This refers particularly to putting employees at a disadvantage on grounds of their gender, race, skin colour, ethnic, cultural, national or social background, language, religion, age, disability, sexual orientation, gender identity, gender expression, political beliefs or any other beliefs.

Business Partners take into account their employees' special requirements related to their gender, age, or physical or mental disability. Wherever possible, they shall encourage and support the employment of people with such special requirements.

Business Partners do not tolerate any behaviour or actions that are violent, intimidating, hostile, degrading, humiliating or offensive and amount to discrimination, harassment or violence. Such behaviour will be sanctioned appropriately and without exception.

c. Health and safety at work

Business Partners make every effort to ensure that their employees are safe and healthy at work. They draw up suitable measures to prevent accidents and damage to health.

d. Fair working conditions

Business Partners' employees perform their duties at their own free will and are informed about the conditions of their employment contract before starting work. Employees receive suitable remuneration for their work and reserve the right to terminate their employment contract observing a suitable notice period.

Business Partners observe their employees' freedom of association in relation to trade unions.

e. Prohibition of child labour

Business Partners shall ensure that all applicable laws and regulations relating to the prevention of child labour are complied with. In particular, they undertake to observe the international conventions and recommendations on child labour issued by the United Nations (UN) and International Labour Organisation (ILO), in particular ILO Convention No. 138 concerning the minimum age for admission to employment issued on 26 June 1973 and ILO Convention No. 182 concerning the ban and immediate elimination of the worst forms of child labour issued on 17 June 1999. In particular, no workers under the age of 15 shall be employed unless there is an exception recognised by the ILO. In addition, persons under the age of 18 shall not perform work which, by its nature or the conditions in which it is performed, is likely to be dangerous to life, health or morals.

5 Raw materials and conflict minerals and metals

The Business Partners comply with the specifications for regulated substances and product contents and all relevant laws prohibiting or restricting the use, contents and handling of certain substances, in particular the RoHS Directives of the EU (RoHS Directive 2011/65/EU [RoHS 2] of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment, supplemented by Directive (EU) 2015/863 [RoHS 3], taking into account all further amendments) and the REACH Regulation of the EU (EU Chemicals Regulation EC 1907/2006 REACH of 18 December 2006, taking into account all amendments) as well as applicable laws and regulations with similar regulatory content.

We require our Business Partners to manage their supply chains responsibly for all minerals, especially for so-called conflict minerals for example tin, tungsten, tantalum, gold and cobalt. Business Partners must comply with applicable laws and regulations and establish processes in line with the OECD Due Diligence Guidance for Promoting Responsible Supply Chains for Minerals from Conflict and High-Risk Areas.

6 Environment

Business Partners are committed to protecting the environment. In particular, they strive to use natural resources in an efficient manner and implement suitable measures to minimise the negative impact of their business activities on the environment. Business Partners comply with all legal requirements and industry standards in the area of environmental protection.

a. Resource consumption

Hawa's Business Partners shall, wherever possible, support a precautionary approach to environmental issues, take initiatives to promote greater environmental responsibility and encourage the dissemination of environmentally friendly technologies.

b. Hazardous substances

Business Partners shall minimize the use of hazardous substances and ensure that all hazardous substances are transported, stored, used, processed and disposed of in a safe and environmentally sound manner. Business Partners shall inform employees of relevant safety procedures and ensure that they receive appropriate training in the handling of hazardous substances.

c. Emissions and waste disposal

Business Partners are continuously committed – beyond the minimum legal standards – to reducing environmentally harmful emissions. In particular, greenhouse gas emissions are to be kept as low as possible. Materials used are reused wherever possible. Waste and waste water are to be disposed of in a safe and environmentally friendly manner in order to avoid pollution of air, water and soil.

7 Protection of sensitive, confidential and protected information

Business Partners ensure that all sensitive, confidential and protected information related to products, services and contractual agreements, as well as personal data, is adequately protected. This includes protecting this information from unauthorised access, destruction, use, modification and disclosure through appropriate physical and electronic security procedures. Business Partners must mitigate emerging risks to information systems by implementing appropriate IT cyber security programmes. Business Partners must report any suspected or actual security incident to the Hawa Group as soon as it becomes known. Any disclosure of Hawa Group information to third parties requires the prior written consent of a Hawa Group company.

8 Execution

The Hawa Group reserves the right to verify the execution of this Code of Conduct and/or to request its Business Partners to submit evidence of its observance.

Any violation of this Code of Conduct by the Business Partner shall be treated as a breach of contract and authorises Hawa Group companies to terminate the contractual relationship subject to any other agreements and without a Hawa Group company becoming liable to pay the Business Partner any damages resulting from the termination of the contract and its consequences.

Place, date

[Company, name of the Business Partner's authorised signatory]