

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 suppliers, dealers and resellers (**Business Partners**).

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 forms 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 implement any necessary organisational structures to ensure that they are complied with.

1 General directives

Business Partners undertake to meet their social and civil responsibilities in all of their corporate activities.

Business Partners undertake to adhere to all local, national and international laws that apply to their business and 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 other business partners

Business Partners acting on behalf of 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 local legislation related to corruption and bribery. The following principles also apply independently to any local 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 a view to influencing 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 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

Business Partners respect and support the protection of internationally recognised human rights in all of their business activities (see in particular the Universal Declaration of Human Rights issued by the United Nations on 10 December 1948).

b. No discrimination

Business Partners undertake not to discriminate against employees during the recruitment process and during their professional activities 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, ethnic, cultural, national or social background, language, religion, age, disability, sexual orientation, 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 implement suitable measures to prevent sexual harassment at work and make sure that any such conduct is never tolerated and any offenders are penalised accordingly.

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 and child protection

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.

Business Partners 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.

5 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.

6 Trade secrets

Business Partners ensure that industrial secrets, trade secrets and any other confidential information belonging to the Hawa Group, of which a Business Partner becomes aware of, are treated as confidential and are not passed on to a third party, made accessible to third parties or published without prior written approval from a Hawa Group company.

7 Execution of this Code of Conduct

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]