

# Ethics Charter

Our prosperity and sustainable development at Hager Group depend on the trust we inspire in our customers, partners, suppliers and stakeholders. This trust is also important in the relationship between the company and our employees and between employees. For this trust to develop and continue, everyone, at all levels of the group, should comply with a number of principles and rules of conduct.

This Ethics Charter outlines these principles thus guiding all employees if they are to face complex situations. It applies to the entire population of Hager Group; employees, Corporate Officers, members of Management Teams, Senior Management and the Board of Directors. On a daily basis, we are all required to comply with these rules of conduct.

The requirements set out in this Ethics Charter do not replace the laws and regulations in effect in countries where Hager Group is present, and they can be complemented, but never overruled, by internal local rules, guidelines, or policies covering specific issues.

We count on the commitment of each and every one, to understand, share and apply this Ethics Charter.

# hagergroup

## Chapter I – Business Ethics

We consider business ethics, including, but not limited to corruption, human rights abuses, fraud and/or discrimination, in everything we do. We implement and continuously improve our Ethics Program where we formalise our ethical principles (Ethics Charter, Codes of Conduct, Policies, Guidelines ...) and inform, sensitise and train our employees on business ethics and applicable laws & regulations.

## Chapter II – International Treaties, National Legal Provisions, Local Practices

We operate in compliance with international treaties, as well as with the Directives of the European Union and in keeping with the commitments made as signatories of the United Nations Global Compact. We apply the laws and regulations of the countries where we are present and operate, wherever possible, in keeping with local customs and practices. We request our business partners comply with the same rules and principles.

## Chapter III – Open Competition, Competitive Intelligence, Intellectual Property

We comply with European and International competition law, as well as with the legal provisions specific to each of the countries where we operate.

### Competitive Intelligence

We refuse to engage in any form of unfair competition toward our competitors and commit to limiting the collection and use of information related to our competitors' sales and industrial activities, in full compliance with legal provisions.

### Intellectual Property and Assets

We protect the Intellectual Property (IP) and Assets of Hager Group (HG) and enforce its rights against others who take or use HG IP without proper authorisation. Every employee is accountable and responsible for these IP and Assets and protects them from theft, loss, distortion, misappropriation, disclosure, copying, misrepresentation and any other form of misuse. We respect valid IP rights of third parties and avoid unauthorised use of IP or copyrighted materials that belong to other people or organisations.

## Chapter IV – Communication

We communicate and present all Hager Group products, solutions and services in an honest manner ensuring that all advertising and promotional material highlight established performance and features. In our communication, we do not denigrate our customers, suppliers, partners or competitors. When we communicate either as individuals or representatives of Hager Group, we ensure there is no confusion between personal opinions and the position of Hager Group. All employees are responsible for preserving the reputation and image of Hager Group.

### Privacy and Data Protection

We take data protection and data security very seriously and pay special attention to the protection of sensitive personal data. We respect the confidentiality of all personal information of our stakeholders be they employees, customers, consumers and/or business partners. Only the data necessary for effective operations at Hager Group is acquired and retained. All employees are responsible for protecting sensitive data and documentation, including but not limited to confidential information.

## Chapter V – Product Quality and Personal Safety

**Product safety and quality**  
We are committed to providing flawless reliability and quality in all products, solutions and systems from design to distribution. The majority of our production sites and our quality management systems are certified ISO 9001. Only the Group Alert Cell ("GAC") can decide on the course of action, should a problem arise on a series of products. It can, in particular, request a product recall when a flaw is suspected, in particular when the products involved are for personal safety and property protection.

## Health and safety of individuals at Hager Group

We strive to guarantee that all employees at Hager Group sites are able to conduct their activity in safe and healthy working conditions. Based on this principle and ISO 45001 standards, we have developed a Sustainability Policy including a section on Health and Safety in the Workplace, its compliance and support is mandatory for all.

## Chapter VI – Equal Opportunity, Inclusion, Social Dialogue and Talent Development

We implement our Human Resources policy in compliance with the Universal Declaration of Human Rights and the Labour Code of the International Labour Organisation to:

- promote Human Rights,
- offer everyone equal career development opportunities,
- deter all forms of discrimination or undermining of human dignity,
- respect the identity and physical & moral integrity of all individuals.

All our employees work together in an open and respectful manner. Any behaviour or action infringing upon these rights is not accepted. We take strong and affirmative action where necessary to increase employment opportunities and inclusion. We strive to mirror society's diversity in our workforce.

### Social dialogue

We value the direct expression of all our employees and promote honest and open dialogue with Work's Councils and employees' representatives following local procedures and Labour Laws.

### Talent development

We develop talents and improve employability of all our employees with our Human Resources policy.

## Chapter VII – Environmental Protection

We commit to our Environment Policy, which is part of our Sustainability Policy. We constantly strive, wherever we operate, to reduce our environmental impact. All our actions are carried out in line with environmental protection principles and management systems implemented based on international standards, such as ISO 14001 and ISO 50001. We promote a sense of environmental responsibility throughout the value chain and encourage both our suppliers and customers to abide by these principles.

## Chapter VIII – Conflicts of Interest

We promote the principle of transparency and sensible cooperation as fundamentals of our work methods. We are responsible for reporting to our managers or our local Human Resources department any situation in which our personal interests or those of the company and/or people around us may be impacted by a decision made by a group department or entity. This applies not only to conflicts of interest, but also undue influence or favouritism.

## Chapter IX – Invoicing, Settlement and Expenses

We do not allow the transfer of funds outside the official financial channels of Hager Group. For every fund transfer, a substantiating accounting statement must be available; no invoice, settlement or reimbursement may be made to or received from a third-party, if the said item is not specifically described in contractual and/or accounting documents referenced in the Hager Group Financial Manual. Every amount payable or receivable must match exactly with a material item, in other words, an actual service or actual expenses; any amounts payable as reimbursement of expenditure must be substantiated by accounting documentation.

## Chapter X – Corruption, Gifts and Undue Benefit

We base our development solely on the quality of industrial, sales and administrative expertise found across the group. As such, the relationships we maintain with our stakeholders (customers, suppliers, partners, utilities,

public authorities, shareholders, employees...) are based solely on objectivity, integrity and transparency. The award, negotiation and execution of public or private contracts or agreements must not give rise to conduct or facts that may be qualified as active or passive corruption or complicity in traffic of influence or favouritism.

### Gifts and Invitations

We only tolerate accepting gifts and/or invitations of modest value, provided that they are in line with an accepted tradition of courteous business relations whether the employee is the donor or recipient. It is our shared responsibility to show common sense and decline any gift or invitation that could encourage indebtedness to the donor party.

### Undue Benefit

We only allow the material benefit set out officially by working contracts or collective group agreements; these official benefits must be reported to the relevant authorities, in particular the tax authorities.

## Chapter XI – Political Activities and Lobbying

We, as a group of companies with business and economic activities, do not finance, support or fund any political parties and strictly maintain political and religious neutrality. However, each Hager Group employee is free to take part in political activities, as long as participation remains a personal commitment and does not in any way refer to or impact Hager Group or its brands. As a leading supplier of solutions and services for electrical installations, we believe it is our duty to take part in public decision-making processes which concern our fields of activities. We want to develop, communicate and share our vision and our technical expertise with the community in its best interests.

## Chapter XII – Integrity Alert Procedure Let's Talk

We aspire to have the trust of our stakeholders, our success depends upon it. The key to this trust is our integrity. Raising an integrity alert allows us to reduce risks for the group and the individual(s) involved. All Hager Group employees, as well as external or occasional workers and all business partners, are invited to report any practice, action or request they deem inappropriate or out of line with the principles stated in this Ethics Charter and/or in any of our Codes of Conduct. Our Group Ethics Officer assesses the admissibility of all claims and ensures their processing. Legitimate concerns expressed and information reported in good faith are encouraged. Slanderous accusations or unfounded rumours may result in disciplinary sanctions. Good faith means that employees have provided information they believe to be comprehensive, truthful and accurate at all times, even if they are later proven to be mistaken. We ensure a fair process in the case of an investigation, respecting the principles of confidentiality and presumption of innocence. To this end, informants may confide their alerts to a trustworthy external service provider guaranteeing confidentiality and anonymity.

Contact details as well as extensive information about the alert and investigation procedure are provided on our intranet and hagergroup.com, and posted at all production sites.

[hagergroup.com](http://hagergroup.com)



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