

Code of Ethics and Business Practices Thermaflex

1. Purpose

The Code of Ethics and Business Practices is a source indicating principles of conduct for all employees, customers, suppliers, local communities and other stakeholders. Thermaflex is committed to respecting human rights as defined in the eight fundamental conventions of the International Labor Organization and its policies are guided by the United Nations Guiding Principles on Business and Human Rights and the International Bill of Human Rights.

In the event of a discrepancy between Local law and international human rights standards, Thermaflex is guided by the higher standard; in the event of a conflict between the two, Thermaflex strives to respect internationally recognized human rights to the greatest extent possible.

The Code was written in the spirit of open communication between all company employees. Any action against an employee making a report in good faith is an action against company policy.

2. General stipulations

The success of every employee, as well as the company, depends on the trust we have in ourselves and the trust that customers, shareholders, suppliers, the local community and other stakeholders place in us. The basic requirements necessary to earn this trust are honesty in action, compliance with the law and adherence to this code are.

We require that all employees read, understand and accept the Thermaflex Code of Ethics and Business Practices. Failure to comply with the code may result in appropriate disciplinary action.

No reason, including the desire to pursue business plans or make a profit, can explain behaviour that is contrary to the Code. No one is permitted to induce third parties to engage in conduct contrary to the code. Everyone is encouraged to notify management, HR or their immediate supervisor of any activities that violate the code, and to cooperate in efforts to detect unethical practices.

3. Special responsibility of managers

Every manager acts as a role model and guide for employees and is therefore expected to create an ethical work environment. An ethical workplace requires open communication with each other and alerting to situations where illegal or unethical behaviour occurs.

4. Employees

We value each employee's contribution and treat each other with integrity, dignity and respect.

a. Equal opportunities

Personnel policies are based on the criterion of ability and efficiency, including employee recruitment, promotion, training and development, remuneration and disciplinary actions. Employment decisions are made in accordance with applicable laws and without regard to an employee's sex, age, national origin, religion or disability.

We provide the legal minimum wage and all legally required benefits, including social security contributions. We strive to provide a minimum wage that covers the basic necessities of life in accordance with local conditions.



b. Diversity

The diversity of our workforce is a tremendous asset to the company. Evaluating each employee as a unique and talented individual leads to a more productive and efficient work environment. This diversity consists of age, culture, education or experience, job status, family status, gender, abilities, lifestyle and thinking, among others.

c. Safety and health in the workplace

The company is committed to maintaining a safe and healthy work environment based on a system using standard operating procedures. We are committed to systematically identifying, evaluating and eliminating health and safety risks. To promote attention to health and safety in the workplace, employees are expected to comply with health, safety and fire regulations and notify management of potential hazards.

We recognize the fundamental human right to safe and accessible water, sanitation and hygiene (WASH).

Potential emergency situations and events should be identified and assessed, and their impact should be minimized by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, employee training and drills.

We protect the health and safety of all employees through appropriate procedures for handling hazardous materials, minimizing the risk of contamination and ensuring compliance with applicable laws and regulations.

We ensure the safety of all persons on Thermaflex premises, minimize the risk of accidents and damage, and comply with applicable building, electrical and fire safety laws.

d. Alcohol and drugs

We expect employees not to be under the influence of alcohol or drugs in the workplace. The possession, sale, manufacture, use and distribution of intoxicants in the workplace is strictly prohibited.

e. Employee confidentiality and privacy

Protect the privacy and confidentiality of any employee's personal, medical and financial information. Never abuse an employee's confidence by disclosing confidential information to anyone inside or outside the company, except for that information whose disclosure is legally justified and necessary for business.

f. Harassment

All employees have the right to work in an environment free of any form of harassment and discrimination, where the privacy and dignity of the individual are respected and protected from aggression or threat.

The company will not tolerate any form of discrimination based on gender, origin, religion, age, physical disability or any other reason.

Company policy and laws specifically prohibit sexual harassment of any kind, including unwelcome sexual propositions, questions about sexual preferences or other conduct that has the purpose or effect of creating an atmosphere of embarrassment, humiliation or hostility. Those who are uncomfortable with the behaviour of co-workers should respond immediately. If the offensive behaviour does not change or discussion of the issue seems fruitless, then the supervisor or human resources department should be contacted. All complaints will be promptly resolved and, when found to be justified, will result in appropriate disciplinary action. All complaints will be kept confidential.

g. Forced labour

We have a zero-tolerance policy against any form of forced or compulsory labour, including any activity that could lead to such practices. We recognize our responsibility to ensure that our employees are free from any form of coercion, exploitation or human trafficking.



h. Prohibition of child labour and protection of juveniles

This policy prohibits child labour and provides adequate protection for juvenile employees (under the age of 18) in all aspects of our business. We are committed to complying with all applicable laws regarding child labour and protection of young workers.

i. Excessive working hours

We recognize that excessive working hours can adversely affect well-being, safety and productivity. Therefore, we are obligated to apply the provisions of the Labor Code in this regard.

j. Freedom of association

We recognize and respect the right to freedom of association and collective bargaining. We are committed to building positive and constructive relationships with our employees and their elected representatives and will facilitate them to carry out their representation.

5. Customers

Our customers are important to us, and we serve them by developing and selling quality products and services with fairness and equality to all.

a. Dealing with customers

There is one simple tip for working with customers: treat them the way we would want to be treated ourselves if we were in their shoes. Let's always be honest with customers.

b. Sales and advertising

The company is committed to providing truthful and accurate advertising, promotional materials, presentations and customer communications. All advertising materials must be approved by the marketing department before publication or distribution. Approved materials may not be modified without appropriate approval. Providing confidential information to customers is a violation of the company's trust in its employees. It is unacceptable to violate laws, regulations, or to act contrary to company policy to satisfy customers.

c. Customer's right to privacy and confidentiality

The privacy and confidentiality of personal, financial and complaint records must be protected. Under no circumstances should the customer's confidence be damaged by disclosing confidential information to any person within the company or from outside who has not justified the need for the information.

d. Lawful sale

A sale can only be made if an actual transaction has taken place. Sales representatives especially should demonstrate ethics in their dealings with customers in order not to expose themselves, the customer and the organisation to the consequences of an illegal transaction.

e. Giving gifts and offering entertainment

The giving of modest gifts, which are a reasonable form of appreciation for business relationships, are generally permitted. During the relationship, we expect suppliers to abide by our gift-giving policy. We, too, will not give any gifts if it is against the rules or policies of the receiving company. Bribes and bribery attempts are illegal and unacceptable. During the relationship, we expect suppliers to comply with our gift-giving policy.



6. Suppliers and other stakeholders

We expect suppliers and other stakeholders to introduce and adhere to codes of ethics based on the same principles as the Thermaflex Code. This counts for, but does not limit to, all our first-tier suppliers in Europe.

7. The company

We care about our reputation for all our production facilities. We incorporate our values in every transaction we conduct and in every business relationship we build.

a. Business records and financial reports

All information must be recorded and reported accurately and honestly. This includes reporting on hours worked, legitimate expenses incurred by the company, sales made, complaints and any other business related to the company. Financial reports must accurately reflect actual transactions and be in accordance with company policy. It is forbidden to make any entries in the company's books intended to conceal or distort the true nature of the transactions carried out. We do not permit non-disclosure or non-recording of accounts, funds and assets.

b. Business communication

All records and communications should be clear, truthful and accurate. Company business records and communications often become public through court cases, inspections by authorized bodies or the media. Exaggeration, coloration or inappropriate language, conjecture, judgment and derogatory remarks or characterization of people and companies should be avoided.

c. Illegal, dishonest and fraudulent acts

We require employees to notify the company of convictions for fraud and other acts of dishonesty within 30 days.

d. Company assets

All employees have a special duty to take care of the company assets entrusted to them; especially important are checks, drafts, cash and financial documents. The proper use of equipment, buildings, data and software is also the responsibility of every employee. It is inappropriate to use company assets - including office supplies, letterhead and telecommunications services - for private purposes. Company equipment should not be used to access, collect and distribute illegal, discriminatory or offensive content.

e. Confidential information

Confidential information is a material asset of the company and should not be disclosed to any person inside or outside the company unless there is a legitimate business need to disclose the information. For example, information regarding products, financial data not made public, financial or strategic plans, and marketing is a competitive advantage for the company and must be protected.

The privacy and confidentiality of personal or financial records of customers and employees are also protected. Never abuse the trust people place in a company. Protecting confidential information is an important responsibility. Securing computer passwords, documents and shredding confidential information are examples of thoughtful protection. Employees should also be on the lookout for inadvertent disclosure of confidential information.

f. Risk assessment

We identify, analyse and minimize potential risks to legal compliance, ethics and business practices, including risks related to human rights and environmental impact.



g. Environment

Thermaflex is committed to make all reasonable efforts to limit air pollutant emissions by implementing available technologies and maintaining compliance with air quality standards to protect human health and the environment.

8. Non-work activities

Employees are not allowed to conduct private business or distribute products or information during working hours and in the workplace. Exceptions may include company-sponsored charitable activities.

a. Authorization

A company's brand has a market value. To protect brand value, use the name and logo only on approved services and products. Do not use the company's name or publicly authorize third-party products or services without approval from the marketing department.

b. Competitors

We value fair and legitimate market competition.

Employees should not discuss or disclose to competitors, directly or indirectly, any of the following topics: prices, offers, price reductions, promotions, profits, costs, terms and conditions of sale, refusals to deal and choice of customers or markets.

If there is a formal or informal discussion of prices, price reductions, costs, terms and conditions of sale or market allocation at any meeting where competitors are present, employees should leave the meeting and inform their supervisor.

Price calculations, marketing and similar competitive information should be obtained primarily from such sources as published articles, advertisements, brochures, research and customers. If directly contacting a competitor for such information, the contacting employee should make it clear who he or she works for and ask only for information that is made public.

c. Competitive information

Information about competitors, customers and suppliers is a valuable resource in a competitive market. However, we will not tolerate unlawful or unethical methods of obtaining such information.

Do not seek, obtain or use any information that is inconsistent with fair competition laws or data protection laws. Possessing information that is a trade secret and has been obtained without the owner's consent and soliciting current and former employees of other companies to disclose such information, is prohibited.

9. Local community

We value the quality of life in our local communities and strive to improve it.

a. Community action and development initiatives

To act well in a community is to support the environment in which the company does business. The company supports local initiatives that stimulate social development and address basic needs in the fields of culture or education.

b. Community of people and political action

Employees are encouraged to participate in the community. In conducting civic or political activities, employees should make it clear that these are their own views and actions and not those of the company. Employees should ensure that their outside activities do not interfere with work performance.



c. Media

Only management and the marketing and sales department are authorized to communicate with the media on behalf of or to explain the business practices, procedures and policy positions of the company's management. Employees receiving questions from the media should immediately contact the marketing department.

d. Environment

Every employee of the company is encouraged to act responsibly in relation to the environment. Minimize, reuse and recycle waste by using company equipment whenever possible. Try to conserve energy in all equipment. Thermaflex commits to taking all reasonable measures to reduce greenhouse gas (GHG) emissions throughout the value chain, prioritizing renewable energy and efficient processes, in compliance with climate-related regulations.

10. Conflict of interest

We value ethical decision-making and trust employees to make choices in the best interests of our customers and the company.

a. General guidance

Avoid any situation that may create, or even just appear to create, a conflict between personal interests and company interests. It is a good and practical principle to disclose any questionable cases to the board of directors, HR department as soon as such situations arise.

b. Gifts and Favours

No gifts may be requested or accepted from the company or any person who trades with, is a competitor of, does business with, or intends to do business with the company. This includes favours not available to all employees, such as special discounts or loans at low interest rates. Common courtesies or gifts of minimal value may be accepted if they are related to normal business practice. Care should be taken to avoid accepting frequent gifts or favours from the same person or organization.

It is not acceptable to accept money in cash or cash equivalents. During our contract negotiations, we strive to obtain the best price for the products and services we purchase from vendors. Gifts or entertainment provided by a vendor are ultimately charged to us as their customers.

Employees who may influence vendor selection or contract negotiations are prohibited from accepting any gifts, favours or entertainment from vendors.

Those given prohibited gifts should notify their supervisor and return the gift with a letter explaining the company's policy in this regard. If the gift is perishable or not returnable, it should be donated to a charitable organization.

c. Entertainment

To determine whether it is appropriate to accept the entertainment offered, ask your supervisor if the entertainment is appropriate and reasonable. How would the entertainment be perceived by others?

An invitation to have a meal or go to a restaurant with the host after a business meeting is usually accepted. On the other hand, invitations to particularly attractive events or exclusive resorts may be too expensive and affect the objectivity of the supplier's evaluation. Frequent attendance at entertainment events with the same supplier may also raise questions and concerns that should be brought to the attention of management.

It is inappropriate to accept invitations from vendors or suppliers to events that last for several days when the host is paying for travel, hotel and other expenses. From time to time, for commercial purposes, it may be desirable to accept invitations to such trips. In such cases, Thermaflex should pay for travel, lodging and other expenses. If in doubt, contact management or the human resources department.



d. Family members

Conflicts of interest can arise when a company does business with companies that employ or are owned by family members of employees. The key issue then is disclosure. Before doing business with family members, first get written approval from management.

e. Relations with suppliers

Suppliers will be treated fairly and in accordance with the law. Products and services are to be purchased solely for the value they provide to the company. If possible, buy from recognized suppliers and try to check their status.

f. External business activities

Employees may not work for or accept benefits from the company's competitors. Employees may work for or conduct their small-scale activities with companies that do business with the company only if they have prior written approval from the CEO of the Thermaflex Group.

11. Personnel department

We value openness and honesty in mutual communication. Most problems encountered by employees can be resolved through good communication with management or the HR department. Questions and other information about employee dishonesty can be submitted anonymously by dropping the information into the "HR Box", which is available to employees in the social area of the building. Those interested in the progress of the problems are asked to sign with their unique number. The return response will cite the number indicated (envelope left within the box). This Code is also violated when false or misleading information is knowingly and intentionally reported. It is strictly forbidden to draw consequences against an employee who informs the company of irregularities in good faith.

12. Summary

The key to solving problems is open communication. If you ever feel pressured to perform an unlawful or unethical act, or if you know of a situation that is unethical or illegal, contact your supervisor or Human Resources.

This Code of Ethics is effective at Thermaflex as of February 26, 2025. All obligations under this document apply to all company employees and representatives of cooperating companies that act on behalf of Thermaflex.

Hans de Haas - CEO