



## Overview

AHI Carrier FZC including each of its divisions, business units and subsidiaries (collectively, “AHI Carrier”) is committed to the highest standards of ethics and business conduct. AHI Carrier employees must comply with the law, honour their commitments, act in good faith, uphold AHI Carrier’s values, seek to advance the interests of stakeholders, communicate openly and effectively, and hold themselves accountable.

Our distributors, dealers, contractors, suppliers and other business partners are critical to our success and, in order to provide superior products and services in a responsible manner, we require you to meet our expectations for ethics and compliance.

This Code of Conduct (the “Code”) sets forth our expectations for each of our partners and aligns with the expectations we maintain for our own directors, officers, employees and representatives. AHI Carrier understands and expects that our partners will have their own internal codes of ethics and conduct. Therefore, this Code is not intended to be an exhaustive list of all ethical and business conduct requirements.

You are responsible for ensuring that your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.

**General Disclaimer:** The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of your contracts with AHI Carrier. If a contract requirement is more restrictive than this Code, you must comply with the more restrictive contract requirement.

## Compliance with Laws

At a minimum, you must maintain full compliance with all laws and regulations applicable to the operation of your business and your relationship with AHI Carrier.

## Quality & Environmental Health and Safety

Your products and services must be designed, produced, and delivered with the paramount consideration being the safety and health of your employees and consumers. You must have in place quality assurance processes to detect, communicate to AHI Carrier and correct defects to ensure delivery of products and services that meet or exceed contractual quality and legal and regulatory requirements. All required inspection and testing operations must be completed properly by appropriately authorized and qualified individuals, and any required certifications must be completed accurately.

You must comply with all applicable environmental, health and safety laws, regulations and directives; and also conduct your operations in a manner that safeguards the environment, minimizes waste, emissions, energy consumption, and the use of materials of concern. You must also assure safe and healthy work environments for your employees and business invitees.

A robust health and safety management system should be implemented to ensure workplace safety, prevent injuries or threats to anyone on Company premises or jobsites, and investigate all reported incidents. This means (a) Follow all safety guidelines, policies, and laws, including local rules and regulations regarding maximum hours worked per day and week, along with required time-off from work to rest -- in line with the principles of applicable International Labour Organization (ILO) conventions; (b) Look out for each other and help others to work safely; (c) Prohibit drugs, alcohol, weapons, or violence in the workplace; (d) Respect all physical security procedures, including access to facilities and use of employee badges; and (e) Promptly report all injuries, hazards, threats, and close calls so they can be investigated, addressed, and prevented in the future.

## **Competition on the Merits and Fair Play**

You must compete strictly on the basis of the merits of your products and services.

You must not pay a bribe in any amount, to anyone, anywhere, for any reason whatsoever, whether on AHI Carrier's behalf, your behalf, or on behalf of others. Accordingly, you must never offer, promise, authorize, or provide, directly or indirectly, anything of value (including business gifts or courtesies) with the intent or effect of inducing anyone (including a AHI Carrier customer, AHI Carrier employee, or higher tier or sub-tier supplier) to forego their duties and provide unfair business advantage to AHI Carrier, you, or others.

You must not engage in any anti-competitive conduct for any reason whatsoever, whether on AHI Carrier's behalf, your behalf, or on behalf of others. Accordingly, you must never rig bids, fix prices, or allocate customers or markets, or exchange AHI Carrier's or your competitively sensitive information (e.g., price, cost, output, etc.) with AHI Carrier's competitors or your competitors. You must also refrain from abusing your market power, whether for your benefit or for the benefit of others, by refusing to deal, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a particular product or service with that of another product or service, or undertaking similar abusive tactics.

You must not engage in other deceptive or unfair market practices, whether on AHI Carrier's behalf, your behalf, or on behalf of others. Accordingly, you must never make misrepresentations regarding AHI Carrier's products or services, your products or services, or the products or services of others.

## **Conflict of Interest**

You must avoid all conflicts of interest or situations giving the appearance of a conflict of interest in your dealings with AHI Carrier. You must report to AHI Carrier any instances involving actual or apparent conflicts of interest between your interests and those of AHI Carrier, such as when one

of your employees (or someone close to one of your employees) has a personal relationship with a AHI Carrier employee who can make decisions impacting your business, or when a AHI Carrier employee has an ownership or financial interest in your business.

## **International Trade Compliance**

You must conduct business in strict compliance with all applicable laws and regulations governing (a) the export, re-export and retransfer of goods, technical data, software and services; (b) import of goods; (c) economic sanctions and embargoes; and (d) U.S. antiboycott requirements.

## **Government Procurement**

You must take special care to comply with the unique and special rules that apply to contracting with any Government. If you support a AHI Carrier contract with a Government, you must at all times follow the Government’s rules for competing fairly, honour restrictions applying to Government employees (e.g., receipt of gifts and employment), deliver products and services that conform to specifications, laws and regulations, adhere to government accounting and pricing requirements, claim only allowable costs, ensure the accuracy of data submitted and comply with all other applicable Government requirements.

## **Information Protection**

You must respect the legitimate proprietary rights and intellectual property rights of AHI Carrier and others. You must take proper care to protect sensitive information, including confidential, proprietary and personal information. You should not use such information for any purpose other than the business purpose for which it was provided, unless the owner of the information provided prior authorization.

## **Accuracy of Records and Submissions**

You must maintain books and records that accurately and completely reflect all transactions related to AHI Carrier business and each of your submissions to AHI Carrier and regulatory authorities must be accurate and complete. You must never make any entry in your books and records or alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction related to AHI Carrier business.

## **Child Labor**

You must ensure that child labor is not used in the performance of your work, whether or not related to AHI Carrier business. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

## **Human Trafficking**

You must comply with laws and regulations prohibiting human trafficking.

## Harassment and Abusive Behavior

You must share our commitment to providing a workplace free from harassment, bullying, threats, and violence. Harassment refers to words or actions that create an intimidating, hostile, or offensive work environment. Whether it's in person or online, harassment isn't just what's intended, but how others perceive it. It can be (a) What a person says or writes, including racial, ethnic, or gender-based slurs, jokes, or stereotypes as well as threatening, loud, or abusive language; (b) What a person does, such as unwelcome touching, making sexual advances; intentionally blocking someone's path, ignoring someone, or deliberately humiliating someone, (c) What a person displays, such as placing lewd photos or derogatory slogans on a workstation or sharing them electronically.

## Anonymous Reporting & Reporting Misconduct

We expect you to provide your employees and your business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of this Code by you or your business partners, without fear of retaliation, including opportunities for anonymous reporting.

In the event that you become aware of misconduct related to AHI Carrier business undertaken by any AHI Carrier employee, any of your employees, or any employees of your business partners, we expect you to promptly notify AHI Carrier. You may contact AHI Carrier's Ethics & Compliance Office, or, if you prefer to contact AHI Carrier anonymously, you may use our Anonymous Reporting Program. Scan the following QR Code to access the Program and enter **AHI Carrier** in the Company Name text box.



You must promptly investigate reports of legal or ethical issues or concerns.

## Code Compliance

You will permit AHI Carrier and/or its representative to assess your compliance with the expectations set forth in this Code in performing work for AHI Carrier, including on-site inspection of facilities and review of associated books, records and other documentation. You must also provide AHI Carrier, upon request, with additional information and certifications evidencing compliance. In the event of any wrongdoing, you will fully cooperate with any related investigation conducted by AHI Carrier.