



Code of Conduct



Introduction

What is the purpose of Havator's Code of Conduct?

In all its operations, Havator is committed to complying with laws and regulations. Havator also follows this Code of Conduct in its operations. It describes Havator's business culture and practices.

Who is covered by the Code of Conduct?

The Code of Conduct applies to all Havator employees and management in all countries. Employees and management must act according to ethical business culture and practices in their work in accordance with the Code of Conduct.

If you have concerns about applying this Code of Conduct in your own work, the concerns should be addressed by your supervisor. If necessary, the application of the Code will be decided upon case-by-case by the CEO or the Board of Directors of Havator Group.

In this Code of Conduct, Havator means all companies that belong to the Havator Group.

Havator requires that its partners and subcontractors also undertake to follow Havator's Code of Conduct.

Entry into force

The Board of Directors of Havator Group approved this Code of Conduct in December 2021.

Contents

Introduction	1
1. Respect for and treatment of people	2
2. Workers' rights	2
3. Occupational safety	2
4. Environment	2
5. Honesty and anti-bribery	2
5.1 General rules	2
5.2 Maximum and quality of benefits	2
5.3 People outside the business relationship	3
6. Sponsorship and donations	3
7. Conflicts of Interest	3
8. Confidentiality and integrity	4
9. Competition law	4
10. Sanctions	4
11. Reporting of violations	4

1. Respect for and treatment of people

Havator respects all people and treats them equally. Havator does not tolerate discrimination, harassment or bullying.

Havator does not tolerate inappropriate treatment of people due to gender, sexual orientation, age, origin, language, religion, belief, opinion, health condition, disability, or any other personal reason.

Havator is committed to acting in accordance with the UN Universal Declaration of Human Rights and the Charter of Fundamental Rights of the European Union. Havator promotes the sustainability principles of the UN Global Compact.

2. Workers' rights

Havator follows labor law.

Havator respects the freedom of association, freedom of expression and the freedom to organize professionally for all workers.

3. Occupational safety

Safety is always a priority in all Havator's operations. Every employee at Havator has an obligation to prevent and suspend activities that pose unnecessary safety risks and report such activities to their immediate supervisor. Havator does not

accept work routines that pose unnecessary danger or violate the rules of occupational safety.

4. Environment

Havator respects the environment, nature, and natural resources. Havator considers the business' environmental impact in decision-making and strives to choose alternatives that have the least impact on the environment and nature.

5. Honesty and anti-bribery

5.1 General rules

Havator works honestly and openly. Havator does not tolerate any form of bribery or inappropriate influence on work-related decision-making in its operations.

It is forbidden to provide or receive benefits, gifts, or hospitality if it may affect work-related decision-making in an inappropriate way. It is also forbidden to give advice to others about such proceedings.

Giving or receiving a benefit must not be kept secret but presented transparently.

5.2 Maximum and quality of benefits

Havator's employees and management may only provide or receive benefits of low and reasonable value that do not affect

work-related decision-making. Minor and reasonable benefits include gifts with a VAT-free value of up to EUR 100, and events with a VAT-free value of up to EUR 300 per participant. Giving or receiving money is always forbidden.

During a calendar year, Havator's employee or management can receive benefits from the same party up to a value of EUR 500 without VAT.

Havator pays for travel and accommodation costs for business trips.

5.3 People outside the business relationship

When Havator's employees and management participate in events together with a companion not employed by Havator, the companion must pay for the event themselves. It is forbidden to accept a benefit for a companion.

It is forbidden to provide benefits to people outside the business relationship, e.g., family members or relatives of a representative of the other party in the business relationship.

6. Sponsorship and donations

Havator's Board of Directors has decided on Havator's internal approval policy. The internal approval policy determines, which person or operating unit decides on the sponsorship that Havator takes on. Sponsorships must be honest, transparent and in accordance with good practice and must not be kept secret.

The internal approval policy also determines which person or operating unit decides on donations made by Havator. Havator can make small donations to non-profit organizations. Donations must be made transparently and must not be kept secret.

Havator does not financially support political parties, groups, or individual politicians.

7. Conflicts of interest

Havator's Board of Directors has decided on Havator's internal approval policy. Havator's employees must act loyally towards Havator and in every way in Havator's best interests. The pursuit of one's own or a close relative's interest is not allowed when deciding on Havator's affairs.

Pursuing one's own or a close relative's interest must not affect the choice of Havator's partners

and employees. Decisions may not be made if the decision is expected to benefit oneself or a close relative.

Any conflicts of interest between Havator and an employee must be openly reported to the HR department or supervisor. This must also be done even if the conflict of interest is only possible or uncertain.

8. Confidentiality and integrity

Havator protects its own and its partners' trade secrets and other confidential information. Such information may never be disclosed or used without permission.

Havator respects its employees', and everyone else's, integrity. The processing of personal data follows applicable rules and regulations.

9. Competition law

Havator competes fairly and transparently. Havator complies with competition law and does not tolerate any infringement.

10. Sanctions

Havator complies with international sanctions and the restrictions imposed by them.

11. Reporting of violations

If a Havator employee or partner discovers or suspects financial misconduct or other conduct that violates this Code of Conduct, he or she shall report such conduct.

The reporting is carried out via Havator's Whistleblowing Channel, available on Havator's websites.

A whistleblowing report can be sent in one's own name or anonymously. It is easier and more efficient to process reports made in one's own name. Havator treats the whistleblower's personal data and the personal data provided in the report confidentially and in accordance with the applicable law. Havator does not accept any form of inappropriate treatment towards a person reporting on misconduct as a result of such reporting.



HAVATOR

SAFETY FIRST