



Code of Conduct for Suppliers

H+H
PARTNERS IN WALL BUILDING

H+H Code of Conduct for Suppliers

H+H and any entity in the H+H Group are committed to conduct business in a fair, ethical, and socially responsible manner and we expect our suppliers to share the same commitment. For this we have adopted a Code of Conduct for Suppliers, which supplements the H+H Group Code of Conduct, available at www.HplusH.com.

Specifically, we expect our suppliers, service agents, or other third-party service suppliers acting on behalf of H+H, to be committed to compliance in the following areas:

People

- To support and respect the protection of human rights within their areas of influence
- To respect freedom of association and the effective recognition of the right to collective bargaining by employees
- To comply as a minimum with all applicable health & safety legislation
- To not accept the use of forced or compulsory labour or the use of child labour
- To support the principles of equality, fairness, inclusion and respect when dealing with the recruitment and selection of employees
- EU General Data Protection regulations and requirements

Business Ethics

- To comply with all relevant legislation including but not exclusively:
 - All relevant anti-bribery and anti-corruption legislation in respect of their dealings with H+H
 - US and EU trade sanctions requirements
 - All relevant anti-money laundering legislation

Environment & Climate

- To comply with all applicable environmental legislation and supporting a proactive approach to environmental challenges

People

Workplace health & safety

Safety first! Our most valued asset and therefore our primary responsibility is our employees and stakeholders. We believe that everyone shall be entitled to a safe and secure workplace and expect all suppliers to share the same dedication to health and safety. Suppliers should as a minimum comply with all relevant and applicable laws and regulations and ideally continually strive to improve health & safety performance towards best industry practice.

When present on any H+H sites, suppliers are asked to read, follow, and sign any health and safety protocols and procedures.

Basic employee rights

H+H strongly supports the human rights and employee rights as set out in the UN Universal Declaration of Human Rights and the International Labour Organization's eight fundamental conventions.

As a supplier to H+H, we expect you to:

- Respect freedom of association and the right to collective bargaining
- Support the principle of equal opportunity
- Not accept the use of forced or compulsory labour or the use of child labour
- Ensure that there is no modern slavery or human trafficking in any part of your supply chain and take all reasonably practical steps to prevent modern slavery

Equality, non-discrimination, and respect for privacy

Everyone deserves to be treated with proper respect regardless of race, gender including gender expression or gender identity, age, national origin or citizenship, religious or political convictions, sexual orientation, marital status, disability or genetic information, or any other legally protected categories. We will not tolerate any kind of harassment or abuse and we expect our suppliers to do the same. We all have the responsibility to treat each other in a fair and respectful manner.

H+H collects personal data about you as a supplier, for example your vendor details such as company information, telephone number and postal or email address and retains only the relevant personal data in compliance with GDPR and/or other applicable personal data protection legislation. Suppliers should ensure collection and further processing of employees' and other stakeholders' personal data are done in compliance with the applicable data privacy legislation and best practices.

Business Ethics

Fair and lawful competition

H+H wants to compete on equal and fair terms – no deal is good enough to be achieved by unethical or illegal means! Unlawful and anti-competitive arrangements may not only damage our business and reputation, but also result in severe penalties as well as imprisonment for individuals. H+H expects our suppliers to respect free and fair competition and to comply with all applicable competition laws.

- Do not participate in any price fixing or market sharing or enter into anti-competitive agreements
- Do not abuse a possible dominant position in the market.

Bribery and corruption

H+H condemns corruption and bribery, and it is therefore not acceptable for any employee or supplier to:

- Promise or offer a bribe in any form to a public official
- Solicit, accept, promise, or offer a bribe or kickback in any business relationship
- Violate any relevant anti-bribery and anti-corruption legislation in the countries which they operate
- Comply with all relevant US and EU trade sanctions requirements

Conflicts of interest

We expect our suppliers to disclose if there are any potential or actual conflicts of interest that would concern their dealings with H+H. A conflict of interest can occur when a supplier's private interests influence or have the potential to influence the decisions they make while working for H+H. It can be difficult for suppliers to make decisions impartially when they have two opposing interests. Conflicts of interests can create an uneven playing field (or the perception of one), and if not managed have the potential to evolve into corruption.

Money laundering

Watch out for unusual payments! Money laundering is disguising illegal sources of money ("dirty money") so that the money looks like it came from legal sources ("clean money" or "white money"), e.g., by using money earned from criminal activities to buy legal products such as e.g., H+H products. Money laundering is a serious crime, and no employee or supplier shall accept any payment which is likely to stem from criminal activities.

Sanctions

Sanction requirements imposed by the European Union have to be followed by all persons and entities doing business in the European Union, including nationals of non-EU countries, and also by European Union nationals and entities incorporated or constituted under the law of an EU-member state when doing business outside the European Union. The Relevant Sanctions contain restrictive measures targeting regimes, governments, countries, industries, legal entities and/or natural persons.

Human rights

We extend our strong support for human rights to safeguard the basic employee rights (see the Employee section above) to also encompass a general obligation that our suppliers commit to respect the protection of internationally proclaimed human rights and to report any human rights abuse within H+H or our suppliers.

Environment & Climate

Doing business in a sustainable way is an integral part of all of H+H's activities. We are each responsible for keeping the environment, sustainability, and our community in mind when making business decisions. To help ensure that sustainability is always considered when H+H does business, we have stated a clear Sustainability Strategy in our Sustainability Report, and we further expect suppliers to:

- As a minimum comply with all environmental legislation
- To support a proactive approach to environmental challenges including
 - Energy optimisation
 - Resource efficiency
 - Waste management and recycling
 - Committing to proactively undertake initiatives to protect the climate and environment

Violations of the Code of Conduct for suppliers

H+H will not tolerate any breach of this Code of conduct for Suppliers. It is therefore very important that you speak up immediately if you become aware of or suspect any violations, so we can act in due time. This includes, for example, breaches of health & safety procedures, bribery, corruption, fraud, or anti-competitive arrangements. H+H wants to promote an open dialogue, and we therefore encourage you to report your concerns to your point of contact within the H+H Group. However, if circumstances are such that you prefer to report in confidence, you may also report your concerns – anonymously or non-anonymously – through our [online whistleblower system](#) available from all H+H websites.

Please note that H+H may terminate a contract with a supplier who violates this Code of Conduct for Suppliers or refuses, if asked, to take part in a remediation plan. H+H will also exclude suppliers who do not demonstrate that they meet our high ethical and CSR standards or show compliance with relevant laws.