

Ethics Charter

Hager Group's prosperity and sustainable development are reliant on the trust it inspires in its customers, suppliers and all the stakeholders – and this trust also needs to exist in the relationships between the company and its staff members, as well as between those staff members themselves. In order for that trust to develop and endure it requires, at all levels of the company, compliance with a number of principles and rules of conduct. The purpose of this Ethics Charter is to outline those principles and thereby guide the company members as they come face to face with sometimes complex concrete situations.

The Ethics Charter applies to the entire group workforce and that of its subsidiaries throughout the world. It also concerns all Corporate Officers, members of the Hager Group Management Team and Senior Management of its subsidiaries throughout the world. Each employee is required to comply with these conduct rules in their everyday actions.

The requirements set out in this Ethics Charter are not intended to replace those set out by the laws and regulations in effect in countries where Hager Group is present, nor those set out by existing internal local rules and regulations, but they are complimentary to them, so that all members of Hager Group can uphold a set of principles and rules that must be applied at all times. Practical guidelines and specific policies can be drawn up and used to respond to specific issues, such as the Financial Manual or the Procurement Policy which already exist. We count on the commitment of each and every one of you, so that the Ethics Charter becomes jointly shared, understood and enforced.

Chapter I - 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 we made as signatories of the UN Global Compact.

We apply the laws and regulations of the countries where we operate and act, wherever possible, in keeping with local customs and practices.

Chapter II - Open Competition, Competitive Intelligence

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.

Chapter III - Personal Safety and Protection of Property

Product safety and quality

Our reputation as an upright company hinges on our ability to provide flawless reliability and quality in all products and systems. Each Hager Group employee shall be committed to achieve total product quality, from design to distribution.

The Crisis Management Unit is the only one empowered to decide on the course of action, should a problem arise on a series of products. It can, in particular, decide to arrange for a product recall when a flaw is suspected, in particular when the products involved are intended to protect personal safety and property.

Health and Safety of individuals at Hager Group:

Any individual working at a group site, whatever the capacity, must be able to conduct their activity in safe and healthy working conditions. Based on this principle, we have developed a Policy on Health and Safety in the Workplace, compliance with and support of is mandatory for all.

In the event of a situation affecting the health of a broader population, an epidemic or a pandemic arising, the Crisis Management Unit must be contacted in order to minimise its consequences, using the alert procedure.

Protection of immaterial property at Hager Group:

We have opted for great transparency and widely-ranging internal communication on business data and information. In exchange, it is our shared responsibility to protect that data and information from theft, loss, distortion, misappropriation, disclosure, copying, misrepresentation and any form of misuse.

Chapter IV - Equal Opportunity, Diversity and Dignity

We implement a Human Resources policy designed to:

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

All employees shall work together in an open and respectful manner. Any behaviour or action infringing upon these rights is not accepted.

Chapter V - Responsible Partnership and Humanitarian Action

Responsible partnership:

As a manufacturer, our desire is to actively support the sustainable development of the Electrical Manufacturing industry. Our action is in full compliance with the principles set out by the UN Global Compact, which we strive to promote throughout the value chain, from the supplier up to the customer-installer.

Humanitarian action:

In the event of natural or humanitarian disaster, Hager Group or one of its subsidiaries may decide to take part in action programmes designed to help the impacted populations. Should this be the case, the Ethics Committee (see Chapter X) shall set out the policy and approve the action programme, using the following as its key criteria:

- The company has an establishment in the country impacted and employs staff there
- A humanitarian aid project is submitted and supported by an employee or group of employees from the Company
- The project is concrete and of recognised public interest

The company participates as a partner, not taking on any responsibility as project designer or operator. Each employee is free to take part in humanitarian aid programmes of this kind by making donations, on an individual basis. The donations collected across the group will be put into a special account and released as the project progresses, under the supervision of the Ethics Committee.

Chapter VI - Environmental Protection

Our Environment Policy forms an integral part of the Sustainable Development Policy to which Hager Group has committed. The company constantly strives, wherever it operates, to mitigate and over its environmental impact.

We pledge that all actions will be carried out in line with environmental protection principles and implement management systems based on international standards (such as ISO 14001). We promote a sense of environmental responsibility throughout the value chain and encourage both our suppliers and customers to abide by these principles.

Chapter VII - Conflicts of Interest

Our work methods are interwoven with the principles of transparency and sensible cooperation. We must, of our own accord, report to our managers or the local Human Resources Department any situation in which our personal interests or those of the people around us might be impacted by a decision made by a Company department or entity. This applies not only to conflicts of interest, but also undue influence or favouritism.

Chapter VIII - Invoicing, Settlement and Expenses

No fund transfer may be made outside the company's official financial channels. 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 item in question is not specifically described in contractual and/or accounting documents referenced in the Hager Group's 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 IX - Corruption, Gifts, Undue Benefit

We base our development solely on the quality of the 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 or employees) are based solely on objectivity, integrity and transparency.

Gifts/invitations:

Only gifts/invitations of modest value shall be tolerated, 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 appears to induce a relationship of indebtedness to the donor party.

Undue benefit:

Only the material benefit set out officially by working contracts or collective company agreements shall be allowed; these official benefits shall be reported to the relevant authorities, in particular the tax authorities.

Chapter X - Alert procedure – Addressing Breaches

Hager Group's success depends on the trust it inspires in its stakeholders. 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 employees of Hager Group, 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 the Code of Conduct Anti-Corruption.

The Group Ethics Officer assesses the admissibility of all claims and ensures their processing. Legitimate concerns expressed and information reported in good faith are encouraged. Slandorous accusations or unfounded rumours may result in disciplinary sanctions. Good faith means that employees have provided information they believe to be comprehensive, honest 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 Hagernet (Sustainable Development-Ethics-Integrity Alert System), Hager Group live and hagergroup.com, as well as being posted at all production sites.

hagergroup.com



Daniel Hager
Chief Executive Officer

Philippe Ferragu
Chief Group
Resources Officer

Franck Houdebert
Chief Group Human
Resources Officer

François Lhomme
Chief Technical Officer

Mike Elbers
Chief Marketing Officer