

Summary

Huizenga Group Automation (the “Company”) supports the protection of international human rights within the realm of its existence and is committed to the highest ethical standards. This Code of Conduct and Basic Working Conditions policy (this “Code of Conduct”) represents the overarching principles guiding the business practices of the Company and its employees, and the Company expects the same of its Suppliers.

The Company’s principles and guiding business practices are consistent with the human rights frameworks identified in the following:

- The United Nations Universal Declaration of Human Rights
- The United Nations Global Compact
- The organization for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises
- The Global Sullivan Principles of Social Responsibility

Any suspected violations of this policy are to be reported promptly to the General Manager, who in turn will inform HR. Employees and non-employees are strongly encouraged to report any suspected violation of this policy (including Human Rights, Environmental & Unethical Business Practice complaints), so the Company can quickly address any concerning behavior and ensure that the safety of all staff members is always maintained. The complainant’s identity will be treated as confidential. Complaints will be reviewed within 24 hours. Complainant will be notified of receipt of complaint and may be consulted during the remediation process. Appropriate actions will be implemented within 5 business days. Huizenga Group Automation is committed to ensuring that there is no retaliation to complaints.

Policy/Scope**Ethical Recruiting**

Huizenga Group Automation should ensure that:

- The recruitment process is documented and transparent
- Recruitment is free from discrimination on factors not relating to job performance, such as gender, race, age and beliefs
- Workers should sign contracts and understand their terms of employment before starting work, or leaving their location of origin
- Recruitment fees and deposits are legal and reasonable
- Appropriate due diligence is performed on agents and third parties
- Huizenga Group Automation should aim to employ all workers on permanent contracts

Child Labor

Company will comply with local minimum age laws and requirements and in any case will not employ child labor (defined as any person under the age of 16). Age exceptions will be made where legally allowable for authorized job training or apprenticeship programs that bear a clear benefit to the participants.



Positions or activities that involve increased risk require appropriate safety training and require employees to be older than 18 years.

Work Authorization

Company will require that its employees and labor suppliers meet work permit compliance and global immigration requirements as well as legal status in the respective country of operation.

Compensation

Company will provide competitive wages and benefits to its employees, which meet or exceed the legally required minimum.

Working Hours

Company will comply with local applicable laws regulating work hours, allowing for alternate schedules to be utilized in meeting business needs so long as the schedule remains in compliance with local laws.

Forced Labor – Modern Slavery

Company will not tolerate inhumane treatment of its employees including, but not limited to, physical abuse, harassment, or the threat thereof. Company will not employ forced, bonded, or involuntary labor. All employment terms will be voluntary between the Company and its employees. In addition, Company will not tolerate acts of workplace violence committed by or against its employees or visitors or conduct that creates an intimidating or offensive environment.

Freedom of Association & Collective Bargaining

Company will not discriminate against employees based on specific associations that an employee may have and further must recognize an employee's right to associate with a legally sanctioned organization if s/he chooses.

Discrimination and Harassment Woman's Rights

Company is committed to providing a work environment where all employees and others who do business with the Company, regardless of position or status, and regardless of nationality and national origin, race, religion, gender, physical abilities, sexual orientation, age, or other characteristics, are treated with dignity, respect, and equality. Company will not tolerate behavior that undermines gender equality, reduces the quality of working life or jeopardizes the wellbeing of its employees, whether committed by or directed toward subordinates, coworkers, managers, suppliers, or customers. Company will be committed to providing a business environment in which we value and respect the differences that make individuals unique.

Health and Safety

Company will provide and maintain for all of its employees a safe and healthy work environment that meets or exceeds applicable standards for occupational safety and health. The Company's commitment to protect employees and the environment is a top priority. The Company consistently complies with applicable environmental, safety and health (ESH) regulations as well as customer, community and other requirements. The Company furthermore commits to continual improvement of its operations,

progressively reducing the potential ESH impact of its activities, by focusing on: the health, safety and productivity of employees and processes; efficient use of natural resources; and prevention of pollution.

Anti-Corruption & Anti-Money Laundering

Huizenga Group Automation shall maintain the necessary internal controls, security measures, and technological safeguards to detect and prevent bribery, corruption, money laundering, embezzlement, extortion and fraud, including in countries or regions where the local customs may appear to make it seem allowable. Both as a matter of sound procurement practice and basic business integrity, Huizenga Group Automation will make purchase decisions solely on the basis of which suppliers offer the best value for the goods or services needed. Huizenga Group Automation will avoid any conduct that suggests that its purchase decisions may be influenced by any irrelevant or improper consideration, whether illegal, such as a kickback or bribe, or technically legal, such as personal friendship, favors, gifts, or free entertainment. Based upon the National Association of Purchasing Management (NAPM) “Principles & Standards of Purchasing Practice” guidelines, any ‘grey’ area in purchasing decisions will be address by using common sense and good judgment.

Export Controls & Economic Sanctions

Huizenga Group Automation does not conduct activities nor assist any other party in violating applicable economic sanctions or export control laws and regulations. Huizenga Group Automation will comply with applicable economic sanctions and export control laws and regulations and avoid doing anything that would position ourselves in violation of applicable economic sanctions and export controls.

Fair Competition & Anti-Trust

Huizenga Group Automation will comply with all applicable competition and antitrust laws and regulations. In addition to adherence to applicable laws and regulations, Huizenga Group Automation must not discuss or agree with any competitors to (1) fix or control prices; (2) coordinate during a bidding process; (3) boycott suppliers or customers; (4) divide or allocate markets, territories, products, customers, or suppliers; or (5) limit the production or sale of products or product lines. Huizenga Group Automation will only use legal means to gather information about sellers of products that compete within the Automation industry.

Conflict of Interest

A conflict of interest exists when a person’s or business’ private interest interferes in any way with the interests of Huizenga Group Automation. Employees must disclose any actual or potential conflicts of interest due to either personal or business relationships with anyone, including but not limited to suppliers, business associates, competitors of Huizenga Group Automation or Supplier/Customer employees.

Intellectual Property

Huizenga Group Automation shall respect intellectual property rights of third parties and safeguard customer confidential information. Huizenga Group Automation shall manage technology and know-how that it receives in a manner that protects those intellectual property and confidentiality rights. Employees will not make public any reference to or details of its business transactions with Huizenga Group Automation, without Huizenga Group Automation’s prior consent.

Counterfeit Parts

Huizenga Group Automation shall ensure the existence of methods and processes to: minimize the risk of introduction of counterfeit parts into final products; detect counterfeit parts and materials; provide notification to recipients of counterfeit products; and remove any counterfeit parts from the final products.

Use of Public and Private Security Forces

Huizenga Group Automation shall ensure, if engaging private or public security forces for the protection of their production facilities, operating sites and other premises, that the security forces are appropriately trained and controlled so that they observe the prohibition of torture and cruel, inhuman or degrading treatment, do not harm life and limb and do not infringe on the freedom of association and trade union.

Environment & Sustainability

Huizenga Group Automation strives to meet or exceed applicable environmental laws and standards, and to continually improve environmental health and safety management systems, including implementing practices to prevent pollution and minimize waste. Huizenga Group Automation is committed to protecting the environment as a top priority.

Land, Forest and Water Rights & Forced Evictions

Huizenga Group Automation will avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

Data Protection and Data Security

Huizenga Group Automation will protect the privacy of individuals and the security of confidential assets and information. Huizenga Group Automation will design and maintain processes to provide appropriate protections for this information, in compliance with all applicable local laws.

Financial Responsibility & Disclosure of Information

Huizenga Group Automation required to accurately record and disclose information regarding its business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices. Additionally, Huizenga Group Automation must use sound financial practices and ensure transparency in financial dealings by implementing and maintaining adequate internal controls.

Whistleblowing & Protection from Retaliation

Huizenga Group Automation shall maintain whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith and shall refuse an order that is in violation of Huizenga Group Automation's Code of Conduct. Moreover, Huizenga Group Automation must prohibit retaliation against employees who raise complaints regarding company policies against discrimination and harassment, participate in the investigation of any complaint, or engage in any other protected activity under federal, state and local laws.

Administration/Responsibilities



All of Huizenga Group Automation's employees are committed to implementing and adhering to these requirements.