



WindowMaster Code of Conduct for Suppliers of Materials, Components, and Services for WindowMaster Products

May 2023

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CEO Message



At WindowMaster Group, we are committed to being a Good Global Citizen and conduct business activities with integrity and in a responsible manner. With this policy, we want to encourage commitment to responsible manufacturing between WindowMaster Group and all organizations that provide goods or services to us. Thus, the purpose of the Supplier Code of Conduct is to ensure that all our products are manufactured in a way that characterizes us as a company acting responsibly in relation to all our stakeholders. We aim to establish long-lasting relationships with our suppliers for our mutual benefit and when signing the Supplier Code of Conduct we welcome a constructive dialogue

with our suppliers as part of the implementation process.

The Group is a signatory to the United Nations Global Compact. We encourage suppliers to become signatories or at least comply with the ten principles of the UN Global Compact within the four focus areas of Human Rights, Labor, Anti-corruption, and Environment. The Group expects suppliers to uphold similar standards, ideally described in the supplier policy.

We endorse the guidelines and recommendations of the World Trade Organization (WTO) and will, therefore, other things being equal, prefer suppliers from member countries. WindowMaster constantly works to improve the sustainability of our business operations, internal working, and our supply of goods and services and we request the support of our suppliers in these initiatives in the interest of sustainable progress.

" We are striving to be a good corporate citizens and act fairly and with integrity for mutual benefit. We ask the same of our clients, suppliers and partners."

Our vendors are subject to the WindowMaster Group Supplier Code of Conduct. Suppliers are responsible for making sure that any sub-suppliers and any third parties working on their behalf abide by the rules of this Code.

A handwritten signature in black ink, appearing to read 'Erik Boyter'. The signature is stylized and fluid.

Erik Boyter
Chief Executive Officer

Environment & Climate

At WindowMaster Group, we work to provide sustainable solutions to our customers and society. We prioritize efficient operations that minimize waste and energy consumption and reduce carbon emissions and depend on our suppliers to achieve that.

- We expect suppliers to have a written environmental policy or statement appropriate for the size of their operations
- We expect suppliers to comply with local environmental laws and to limit the consumption of resources
- We urge suppliers to establish carbon and waste targets and monitor and report performance against those targets. We urge suppliers to join the Science Based Targets Initiative to reduce greenhouse gas emissions in line with what the latest science deems necessary to meet the goals of the Paris Agreement – limiting global warming to 1.5 degrees Celsius
- Suppliers should avoid unnecessary product packaging, favoring recycled and recyclable materials with low environmental impact
- We encourage suppliers to choose environmentally responsible materials, methods, and technology to ensure a more sustainable supply chain.





Human Rights & Labour Rights

Human Rights

WindowMaster Group expects suppliers to respect and comply with international labor standards as defined by core conventions of the International Labor Organization (ILO), the United Nations Universal Declaration of Human Rights and commits to respecting the UN Guiding Principles on Business and Human Rights.

- Suppliers shall treat their employees with dignity and respect. There cannot be any discrimination in employment with the supplier based on a person's race, color, country, affiliation with a particular religion or political party, gender, age, sexual orientation, or marital status.
- Suppliers are expected to respect the rights of local communities and poorly protected groups, such as Indigenous people, and consider the impact of their operations on the human rights of these communities. This includes fair hiring practices, the security of employee data, and equal pay for equal work.

- Suppliers shall respect freedom of association and the right to form interest groups. They grant their employees the right to articulate their interests within the framework of the labor laws in force in their country.

Where national law and these international human rights standards differ, suppliers shall follow the higher standard; In case they are in conflict, suppliers shall seek to respect internationally recognized human rights to the greatest extent possible.

Labor conditions and child labor

WindowMaster Group committed to upholding the fundamental rights of workers in the supply chain in line with internationally agreed human rights and labor rights conventions. WindowMaster has zero-tolerance for any child labor.

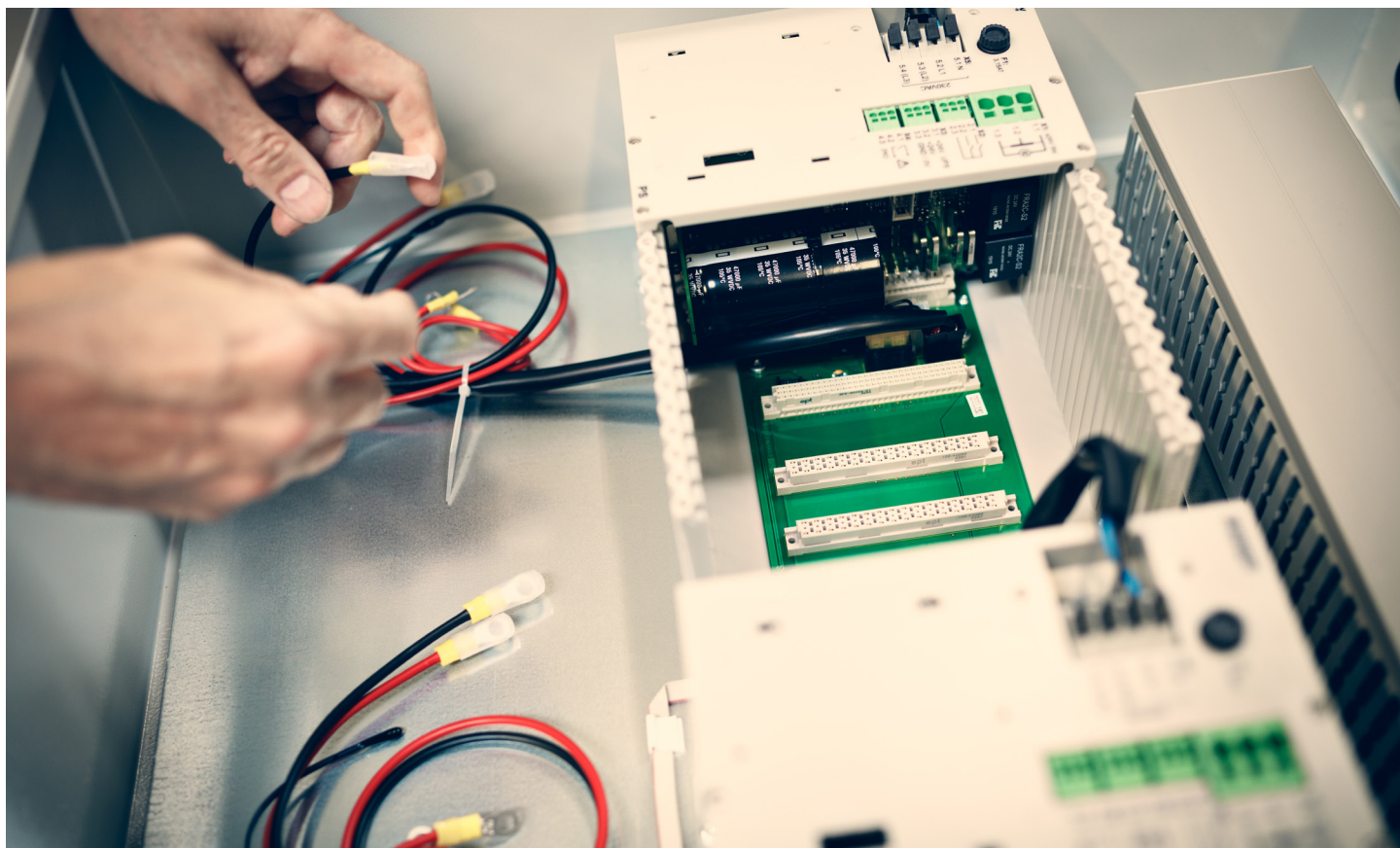
- All legal and ILO-recognized minimum age requirements for work must be complied with by suppliers. Suppliers must always be able to confirm an employee's age.
- Suppliers shall treat all employees with dignity and in accordance with all applicable international, national, and local laws.
- Suppliers are not allowed to use child, bonded, coerced, or forced labour.
- Suppliers shall adhere to all applicable laws and industry standards on working hours, including overtime, as well as wage laws and the right to collective bargaining. Payroll deductions cannot be used as a form of punishment.
- Suppliers are required to comply with the social laws and regulations applicable in each of the countries in which they operate, with respect to maximum daily working hours and overtime, wages and benefits, minimum age, and respect for privacy.
- Suppliers shall acknowledge the employees' right to join associations and unionisation.



Occupational health and safety

For WindowMaster Group, health and safety are top priorities. All the workers and contractors of suppliers must work in a safe and healthy environment. We expect our suppliers to comply with below mentioned requirements. If the local laws are poorly enforced, occupational health and safety requirements or international standards should be used.

- Suppliers shall ensure systems in place to create, implement, and track health and safety policies that are appropriate for business operations.
- Suppliers shall put in place suitable control measures to prevent worker accidents, as well as hazards and risks related to their activities.
- The right tools and equipment for the job should be available, and workers should have access to personal protective equipment and sufficient knowledge of when and how to use it.



Ethics

Anti-bribery and Anti-corruption

WindowMaster Group has a zero-tolerance towards all kinds of bribery and corruption, regardless of local laws and practices.

- All suppliers are required to act in compliance with applicable anti-corruption and competition laws and regulations both on a national and international level.
- We expect our suppliers to renounce giving or accepting improper offerings and receive hospitality or gifts to influence decision-making or obtain an undue advantage. Suppliers shall ensure that the employees whose job roles carry a higher level of risk in ethical business practices such as sales, purchasing, logistics, are trained on what action to take in the event of an issue arising.
- We expect suppliers to carry out all reasonable due diligence to detect and prevent any act of corruption in bribery from employees, suppliers, etc., and to have reporting in place of fraud, corruption, or other corporate wrongdoing.
- Suppliers are expected to work against corruption and bribery in all its forms, including extortion and bribery and have relevant policies and processes in place to ensure that.

Conflict of Interests

When signing a contract with WindowMaster Group, suppliers shall ensure that it has no conflict of interest which would prevent the supplier from acting in the best interest of WindowMaster Group. Suppliers are expected to avoid situations where existing or potential business relationships may appear to compromise their responsibilities or ability to make sound, impartial and objective business decisions in connection with their contractual commitments to WindowMaster Group.

Competition law

At WindowMaster Group, we welcome free and open competition with our zero-tolerance policy of anti-competitive practices. We wish to compete with integrity and fairness.

- Suppliers shall ensure compliance with relevant competition laws and regulations of the countries where they operate



Data Protection

WindowMaster Group ensures the protection of intellectual property rights of its employees and all associated business partners. Our suppliers must also share the same interest regarding data protection. WindowMaster Group's drawings, patents, trademarks, and copyrights are to be safeguarded and our suppliers must ensure that they comply with the terms of usage of such drawings, patents, trademarks, and copyrights.

- Suppliers are also expected to preserve and protect the privacy expectations of all entities they are associated with conducting business with. They must comply with all privacy and data protection laws where any information related to business partners or employees is stored, processed, or shared.

Whistleblower system

- Suppliers shall provide access to a suitable grievance mechanism to report human-rights violations and environmental breaches that could have resulted from the direct or indirect actions of an enterprise or a supplier.
- The complaint procedure must be impartial, non-retaliatory and must maintain confidentiality of identity.
- The employees of the enterprise shall be informed of the establishment of such complaint procedures and the responsibility of addressing grievances must be entrusted to an appropriate person or a group of people.

We expect our suppliers to consider the grievances of their employees in high regard and to take appropriate measures to address such grievances.



Compliance

Compliance with applicable laws and standards

The WindowMaster Group expects suppliers to comply with all international, national and local laws and standards relating to employment, environmental, purchasing and manufacturing practices.

The list of regulations below is not complete.

Area	Legislation
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EU	Electromagnetic Compatibility directive 2014/30/EU
UK	Electromagnetic Compatibility Regulations 2016
EU	Low Voltage directive 2014/35/EU
UK	Electrical Equipment (Safety) Regulations 2016
EU	Radio equipment directive 2014/53/EU
UK	Radio Equipment Regulations 2017
EU	Machinery directive 2006/42/EC
UK	Supply of Machinery (Safety) Regulations 2008
EU	Construction product regulation
UK	Construction product regulation 2019
EU	Restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS) directive 2011/65/EU
UK	The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012
EU	Registration, evaluation, authorization of chemicals REACH 1907/2006
EU	Battery directive 2006/42/EC
EU	Packaging directive 94/62/EC
EU	Waste of electrical and electronic products 2012/19/EU
DE	Lieferkettensorgfaltspflichtengesetz – LkSG (Supply Chain Due Diligence Act)

Compliance, Verification and Audit

Compliance with these guidelines is seen as the basis of a good, constructive and professional working relationship between companies. Any deviation from these guidelines could detrimentally affect this relationship and the. WindowMaster Group reserves the right to check performance with the provisions of this Supplier Code of Conduct and to conduct compliance audits. We expect our suppliers to provide the necessary information and documentation upon request.

Suppliers collaborating or wishing to collaborate with WindowMaster Group acknowledge having received, read, understood, and complied with the requirements set out in this Suppliers Code of Conduct. The person whose signature appears below guarantees that he/she is duly authorized to sign this Suppliers Code of Conduct in the name and on behalf of the supplier indicated below.

Supplier

Address

Zip code

City

First name

Last name

Title

Signature

Date

(dd/mm/yy)

WindowMaster aspires to protect people and the environment by creating a healthy and safe indoor climate, automatically ventilating spaces with fresh air through facade and roof windows in buildings. We offer the construction industry foresighted, flexible and intelligent window actuators and control systems for natural ventilation, mixed-mode ventilation, and smoke ventilation – of the highest quality.

WindowMaster employs highly experienced cleantech specialists in Denmark, Norway, Germany, United Kingdom, Ireland, Switzerland, and the United States of America. In addition, we work with a vast network of certified partners. With our extensive expertise built up since 1990, WindowMaster is ready to help the construction industry meet its green obligations and achieve their architectural and technical ambitions.

windowmaster.com