



REINVENTING COOLING TO SUSTAIN THE WORLD



Code of Conduct

for all business relations of, and affiliates and subsidiaries of BAC



REINVENTING COOLING TO SUSTAIN THE WORLD

OUR VALUES

Our values reflect who we are and how we work as a team of passionate, professional individuals. More than principles, these are daily practices: Ways of being and doing that we commit to pursuing to our highest standards at work and in life.



SHOW
COURAGE



DRIVE
INNOVATION



EMBRACE
RESPONSIBILITY



EARN
TRUST

OUR MISSION

To continually advance truly sustainable cooling — inspired by nature, powered by our people— for a world that depends on it to grow, succeed, and thrive.

This Code of Conduct sets forth and defines the principles and standards of BAC and all its subsidiaries (referred to as “BAC” hereafter) for all its suppliers, subcontractors, customers, and furthermore in general all business relations of and affiliates and subsidiaries of Baltimore Aircoil International NV for goods and services. BAC is committed to a world of sustainable progress and to continually advance cooling in all ways that keep us moving forward. BAC wants to partner with suppliers that will further develop sustainability performance in our company. At the minimum, we expect all suppliers and subcontractors to meet the standards and promote the values outlined below, to help with the advancement of BAC’s commitment to reinventing cooling to sustain the world.

Overall Commitment

Subjects must respect and obey laws in all countries where they operate, obtain and/or sell goods and services. Subjects must respect human rights and diminish environmental impacts produced by their company. Subjects are expected to adhere to internationally recognized environmental, social and corporate governance standards. In addition, subjects must put forth their best effort to implement these same principles with their suppliers and subcontractors.

Ethical Business Conduct

Anti-Bribery, Corruption, Extortion and Embezzlement Subjects shall comply with all applicable anti-bribery and corruption regulations. Our organizations adheres to a zero tolerance policy that includes any form of bribery, corruption, extortion or embezzlement.

Protection of Confidential Information

Subjects are expected to protect confidential information owned by BAC and its customers. Disclosing any confidential information is a violation of this Code of Conduct, BAC contractual requirements and potentially the law. Confidential information includes legal documents, contracts, intellectual property, trade secrets and information about an employee or customer.

Foreign Trade Regulations

Subjects shall take the appropriate measures to comply with the trade regulation laws of the country in which they operate. Subjects must not violate laws on tariffs, duties, subsidies, embargoes and quotas or the provisions concerning the international fight against terrorists.

Fair Competition

Subjects are required to know and comply with applicable antitrust and other competition laws. No price fixing, bid rigging, market allocation or other anti-competitive conduct will be allowed.

Labor Policies and Human Rights

No Child Labor

The unlawful use of child labor is forbidden under any circumstance. The minimum age for employment is the legal limit set by local, state, or national authority, or after completing compulsory education, whichever is greater. BAC respects the protection of children’s health, well-being and educational opportunities.

No Forced Labor (Anti-Slavery and Human Trafficking)

The exploitation or enforcement of involuntary labor by a subject is forbidden. Subjects will not tolerate slavery, human trafficking or involuntary prison labor. Workers shall be free to leave the company and terminate their employment at any time.

Working Hours

Subjects shall not require their workforce to work beyond daily and weekly work hour limits as defined and required by local, state/provin-cial and federal/national law. Working hours (including overtime) must comply with applicable laws and regulations, collective-bargaining agreements and international conventions.

Wages and Benefits

Subjects shall comply with all applicable laws and regulations, includ-ing those relating to minimum wages, overtime hours and legally man-dated benefits. Subjects shall inform their workforce members of the basis on which they are paid and in a timely manner. Deductions from wages as a disciplinary measure shall not be permitted.

Labor Policies and Human Rights (Continued)

Discrimination

Subjects shall not tolerate discrimination or harassment based on gender, color, race, national origin, religion, sexual orientation, age, veteran status, disability, social status, or gender identity. These, or any other non-job-related factor, shall not be used in hiring and employment practices, including wage decisions, benefits, or disciplinary actions.

Health and Safety (Safe Working Conditions)

Subjects should ensure that all workers receive training and regular communications regarding emergency planning and safe work practices. Subjects are required to have systems to prevent, detect and respond to potential risks to the safety, health and security of all employees. Personal Protective Equipment (PPE) will be provided so that employees can complete their jobs safely and warning signs will be posted to identify all potential hazards.

Freedom of Association

Subjects shall respect the right of workers to form and join workers organizations of their own choice and associate freely, as permitted by all applicable laws and regulations where operations occur.

Conflict Minerals

Conflict materials consist of tin, tantalum, tungsten and gold (3TGs). These minerals are often related to serious human rights violations and financing armed groups...more information [here](#). BAC expects all products delivered by subjects to be free of 3TGs. In the rare case a subject must deliver products with 3TGs, BAC must be informed of the conflict materials in writing. Additionally, the Conflict Mineral Reporting [Template](#) (CMRT) must be completed and sent to BAC.

Environment

Environmental Law

Subjects shall carry out operations in full compliance with all federal and local environmental laws and regulations regarding hazardous waste, GHG emissions, waste disposal, etc.

Sustainability

Subjects shall strive to reduce their environmental impacts by minimizing GHG emissions, reducing energy consumptions, reducing water consumption, generating less waste, reducing the use of raw materials and natural resources and reducing emissions to air, water and soil.

Water Quality

Subjects shall identify and implement policies to reduce waste and pollution entering waterways. Subjects will strive to participate in water conservation initiatives by reducing water usage in possible areas of work.

This Code of Conduct is equally applicable to all suppliers, subcontractors, customers and furthermore in general all business relations of and affiliates and subsidiaries of Baltimore Aircoil International NV.

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SUSTAIN THE
WORLD



BALTIMOREAIRCOIL.COM



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The undersigning subject confirms the following:

- (1) Receipt of the "BAC Code of Conduct for all business relations of, and affiliates and subsidiaries of BAC"
- (2) Recognition of and compliance with the principles of the "BAC Code of Conduct for all business relations of, and affiliates and subsidiaries of BAC"

Name

Address

Signature

Full Name

Function

Place

Date

This declaration must be signed by a person duly authorized to sign on behalf of the subject and returned to BAC within 1 month after receipt.

