

**HunterDouglas** 

CODE OF BUSINESS CONDUCT



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# 1 INTRODUCTION AND PURPOSE

At Hunter Douglas, we aspire to help people live beautifully in a connected, energy-efficient space. Our dream is to be the fastest growing, most loved, and most efficient window coverings company in the world. To achieve our dream, we must not only ensure that the organization is effective (driving growth) and efficient (profitable) but also, above all, ethical (we do the right thing and lead by example).

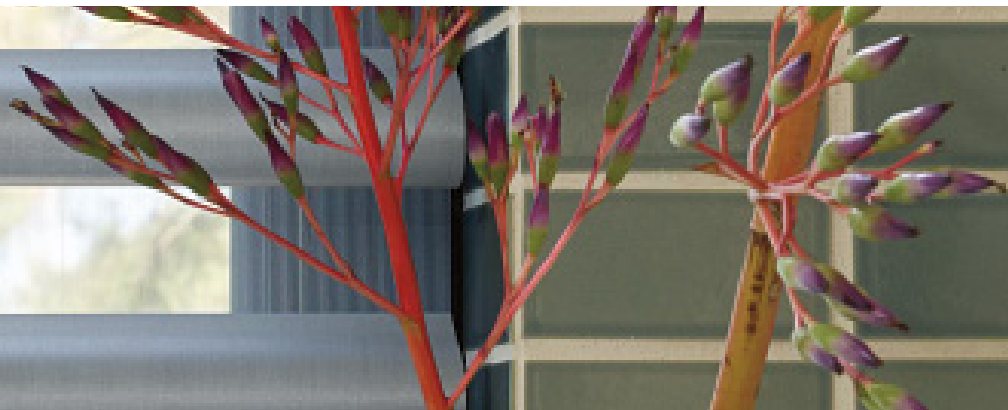
In support of this goal, the Code of Business Conduct (“Code”) serves as a practical guide to ethical decision-making that will ensure the safety of our people, the sustainability of our products, and the highest level of confidence and respect from our stakeholders.

# 2 COMPLIANCE AND OWNERSHIP

Hunter Douglas has always been a company of owners. You are the owner of your decisions, and no one has the authority to require you to do anything unethical or illegal. In uncertain or challenging situations, it is your responsibility to ask for guidance.

Under all circumstances, we must comply with laws and regulations where we operate. Where the Code conflicts with an applicable law or regulation, you should comply with that law or regulation. Where the Code is more stringent than an applicable law or regulation, you should comply with the Code.

This Code applies to employees of Hunter Douglas and its direct and indirect subsidiaries (together, “Hunter Douglas” or the “Company”). Consultants, agents, third-party business partners, contract or temporary workers, or any individuals acting on behalf of Hunter Douglas are also expected to comply with the Code. Together, we can ensure that Hunter Douglas successfully holds itself to its own high standards in cultivating an inclusive, respectful, and compliant work environment.





## 3 PEOPLE AND PRODUCT

### A. Diversity and Inclusion

Hunter Douglas seeks to attract, hire, develop, and promote the best talent in the world. This requires each of us to assist in creating a work environment where unique backgrounds, experiences, and perspectives are respected and valued and, as a result, all employees can reach their full potential. Hunter Douglas takes complaints of harassment and discrimination very seriously, as neither should ever be part of a work environment.

### B. Human Rights

Hunter Douglas is committed to business practices that respect human rights in every jurisdiction in which we operate and throughout our global operations and supplier networks.

### C. Responsible Innovation and Product Quality

We strive to maintain high standards of health and safety across our organization. All employees should endeavor to prevent accidents, injuries, and occupational illnesses across our operations.

Our products help our customers live beautifully within their spaces. We continually strive to develop more energy-efficient, high-quality, and innovative products and services to enhance our customers' living experience. Following the principles of this Code and complying with applicable environmental laws and regulations is a crucial step in our continuing journey of safe and sustainable innovation.



# 4

## PROTECTION OF INFORMATION AND PROPERTY

### A. Confidentiality

Information and data are instrumental to our success and growth. As information is a valuable asset, we must exercise care and discretion before sharing it with third parties. Our customers, business partners, and employees expect us to safeguard their data appropriately.

We must strictly maintain the confidentiality of private, sensitive, or proprietary information about Hunter Douglas, our employees, customers, suppliers, joint venture parties, or former employers, except when disclosure is authorized or otherwise required by law. Confidential or proprietary information includes any inside or non-public information that, if disclosed, could harm or compromise its owner. Using such information for your personal benefit violates this Code.

### B. Personal Data and Privacy

Hunter Douglas respects the privacy of individuals and their personal data, including digital information held by the Company. For that reason, we must always ensure that the personal data of our employees and customers is secured and processed in an ethical and compliant manner. The collection and use of personal data must not only comply with local laws and regulations but also with the principle that privacy is a fundamental right.

### **C. Social Media**

Social media plays a critical role in building our reputation and relationships with one another, customers, design professionals, and the broader community. However, the disclosure of sensitive or inappropriate information through social media has the potential to damage our reputation and our people. Social media posts, whether through Hunter Douglas or personal accounts, should not include confidential or proprietary information or any personal opinion on behalf of the Company. Always be courteous and respectful on social media.

### **D. Information Systems and Company Devices**

All electronic data received or stored on Company information systems or devices, whether it constitutes a business record, personal communication, or another file category, is Company property and should be treated accordingly.



# 5 ETHICAL CONDUCT

## A. Anti-Corruption and Anti-Bribery

Hunter Douglas is committed to conducting business with the highest level of integrity. We have a zero-tolerance approach toward bribery and corruption, regardless of local business customs or practices. This applies to both public and commercial bribery.

Corruption or bribery can include any benefit received or paid to improperly influence a business decision, including a payment, gift, or favor given to an individual to influence how he or she makes a professional decision. Violations of anti-corruption laws can result in criminal or civil liability for the Company or for you personally. In addition, the Company can be liable for actions taken by our agents, consultants, and other service providers who act on our behalf.

Hunter Douglas employees are expected to share our zero-tolerance approach toward bribery with any third parties acting for the benefit of Hunter Douglas and take steps to ensure their compliance with this Code.

## B. Conflicts of Interest

Your personal interests should never conflict, or even appear to conflict, with the interests of Hunter Douglas. An activity or relationship should not affect your objectivity in doing your job, and you should never seek an advantage for yourself or others through your position.

Although it is not possible to delineate every individual action that could conflict with the Company's interests, conflicts may arise in a myriad of ways, including through: (1) allowing personal or romantic relationships to influence your business decisions, including through hiring a close friend or using Company resources for the benefit of others; (2) engaging in activities outside of Hunter Douglas that interfere with your Company responsibilities or otherwise disadvantage the Company; or (3) providing services to, having a financial interest in, or receiving a personal benefit from a current or potential Company business relationship, such as a supplier or a dealer.

When an actual, perceived, or potential conflict of interest arises, you should disclose it to your line manager, a compliance or human resources professional, or via the Ethics Helpline so that we can determine the best way to manage the situation. If you are not sure whether a particular issue gives rise to a conflict of interest, you should disclose it. In some cases, a potential conflict of interest can be addressed simply by making certain functions within Hunter Douglas aware of its existence; in other instances, further action will be required to address or mitigate risks associated with the conflict. In all cases, it is important that we work promptly and with transparency to reach the appropriate outcome, taking into account the Company's best interests.





### **C. Political Contributions**

Any direct or indirect contribution to a political party, committee, or candidate for public office on behalf of the Company or with Company funds is prohibited without formal preapproval of Hunter Douglas' Board of Directors. This restriction applies to cash donations and donations in kind, e.g., providing free materials or services.

### **D. Gifts and Hospitality**

Hospitality can be instrumental to building relationships with third parties. However, the acceptance or giving of gifts can be subject to abuse. You should ensure that any gifts you give or accept are part of legitimate business activity and are not excessive.

### **E. Financial Reporting and Records**

We must always maintain the accuracy and integrity of our business and financial records. All payments must be recorded honestly, completely, and promptly. Falsifying or creating misleading information is never permitted and may be considered fraud.

You must follow any direction to retain records that are subject to a legal hold or relevant to an ongoing audit or investigation.

## F. Economic Sanctions and Anti-Money Laundering

The European Union, the United States, the United Kingdom, and other countries and organizations have economic sanctions in place that may restrict certain international transactions or dealings. Business transactions with certain countries or listed individuals or their representatives are prohibited under these regimes.

Money laundering is the criminal offense of receiving the proceeds of criminal activity, even where it is through legitimate means.

Hunter Douglas is committed to complying with all applicable sanctions regimes and anti-money laundering regulations. Consult a compliance professional if you are aware of any business activities involving Iran, Russia, Myanmar, or Cuba or if you believe that a transaction may involve criminal proceeds.

## G. Fair Competition and Antitrust

Hunter Douglas employees must be aware of all applicable competition and antitrust laws and seek advice from a compliance professional to ensure adherence to them. Market practices should comply with competition laws in countries where Hunter Douglas operates. Infringing these laws may carry severe penalties, including litigation, imprisonment, and reputational damage.

A non-inclusive list of prohibited activities include: (1) participating in a cartel, including by formally or informally agreeing with competitors to restrict competition (e.g., raising prices) or limit competition in a specific market (e.g., creating exclusive territories); (2) exchanging confidential information with competitors, except in certain narrow, preapproved circumstances; or (3) restricting customers' ability to ship and sell goods throughout the EU. In addition, some market practices may be restricted in certain jurisdictions, such as those relating to discounts and sales conditions.



# 6 CONFIDENTIAL REPORTING

Hunter Douglas encourages you to raise any questions or concerns that you may have in relation to potential violations of this Code, our policies, or applicable laws or regulations. Reports can be made to internal resources, such as your line manager or a compliance or human resources professional, or via the Ethics Helpline that is available anywhere in the world, 24/7.

The Ethics Helpline is a confidential and secure means of reporting in your language that is managed by a third party. Where local laws permit, you can file and follow up on reports anonymously. To reach the Ethics Helpline, visit [hdethics.listeningline.com](https://hdethics.listeningline.com).

We handle any information that employees report with the utmost confidentiality, and we only share it to the extent necessary to investigate, resolve, and remediate the relevant issue. In certain circumstances, we may require your cooperation to carry out a thorough and expeditious investigation.

## A. Mandatory Reporting

Hunter Douglas requires managers to report any issue of harassment promptly to a compliance or human resources professional or through the Ethics Helpline. Similarly, any employee with concerns that the human rights of a person in our Company or supplier networks have been violated must promptly report their concerns through one of these channels.

The Company does not restrict an employee's rights or ability to report any violations of law or policy to any government or regulatory body.

## B. Commitment to Non-Retaliation

Intimidation or retaliation against anyone who speaks up to report a potential or actual violation of this Code, Company policies, or any law or regulation is strictly prohibited. Similarly, intimidation or retaliation against anyone who assists with an inquiry or investigation of any such violation will not be tolerated. Retaliation in any form will be considered a violation of this Code.

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## LEADERSHIP AND ENFORCEMENT

Although all employees must follow this Code, managers have the heightened responsibilities to lead by example, empower others to act ethically, and evenly enforce this Code and its related policies, including by distributing and making them available to their teams. Managers must also ensure that they review this Code on an annual basis to confirm that they are not aware of any breach or violation of the Code.

Any colleague who violates this Code, or authorizes or allows a direct report to violate it, will be subject to disciplinary action, which may include termination of employment, clawback of deferred compensation, or other measures deemed appropriate by Hunter Douglas.

This Code is reviewed and updated periodically. Please direct any questions about the Code, Company policies, or any applicable law or regulation to the Compliance team.

