



Code of Ethics

Version n° 3 – July 14th, 2023

APPLICATION

This Policy applies worldwide to all businesses in which the Group has an interest of more than 50% (each an "**Aliaxis Company**" and together "**Aliaxis**" or the "**Group**").

Within the framework of its corporate legal independence, each Aliaxis Company is required to implement this policy in its respective organization.

EXECUTIVE SUMMARY

This Code of Ethics outlines Aliaxis' approach and commitments on ethics & compliance. It defines how we operate and what we stand for.

Contents

1. Statement from our CEO	04
2. Our purpose & behaviours	05
3. Scope and use of this Code	06
4. Our commitment to our people	07
5. Our commitment to sustainability	09
6. Our commitment to comply with the law	10
7. Our commitment to protect our assets	12
8. Training, reporting & violations	13

1. Statement from our CEO

Dear colleagues,

At Aliaxis, our purpose is to bring solutions to the world's water challenges and accelerate the transition to clean energy.

Our *Growth with purpose* strategy was created so that we accelerate our growth, enhance our ability to meet our customers' needs, and create a positive impact on society.

Thanks for our knowledge and expertise, we have the ability to make a concrete difference and meet the climate challenge head-on.

Our individual actions are the building blocks of trust and credibility, for ourselves and for our company. People want to work with us because of the quality of our products, the relationships we've built with our customers, and our reputation. It's up to us to uphold these high standards through our behaviours:

We Dare: to challenge the status quo, to innovate and to learn fast.

We Care: for the environment, our customers and each other.

We Deliver: by taking accountability for our decisions and actions.

This Code of Ethics embodies these behaviours, acting as a guide for how we conduct ourselves at work. You may always refer to it in case of doubt or question.

It starts with each of us.

Thank you for applying our Code of Ethics, every day.

Eric Olsen

Chief Executive Officer



2. Our purpose & behaviours

OUR PURPOSE

Our purpose is to bring solutions to the world's water challenges and accelerate the transition to clean energy.

OUR STRATEGY

GROWTH
with Purpose

Our strategy is to:

- Achieve world-class **safety** as part of operational excellence
- Drive commercial performance and innovation for our **customers**
- Bring **sustainability** to the center of Aliaxis
- Attract, retain and develop the best **people**
- **Invest** in internal and external growth
- Expand in **adjacent and emerging markets**

OUR CULTURE enables all of us to deliver on our strategy and exceed our customers' needs.

WE DARE

to challenge the status quo,
to innovate, and to learn fast.

WE CARE

for the environment,
our customers, and each other.

WE DELIVER

by taking accountability
for our decisions and actions.

3. Scope and use of this code

3.1 Our People

This Code of Ethics (hereinafter the "**Code**") outlines Aliaxis standards of ethics and our commitments towards:

- employees, officers, directors, interns, or volunteers, whether working full time or part time for an Aliaxis Company ("collectively "**Aliaxis People**" and individually an "**Aliaxis Person**"); and
- all customers, vendors, contractors and other business partners of Aliaxis ("**Business Partners**").

The Code is the foundation for our policies and procedures. Each of these policies and procedures provide more accurate details on specific topics.

All our policies and procedures can be found on our Ethics & Compliance intranet.

As an Aliaxis Person, your individual actions influence the way we are perceived as a Group. You are required to comply with this Code, as it will help you to make the right decisions in your daily activities and contribute to our ethics and compliance culture.

If you have doubts, ask yourself:

- Which solution is best aligned with our purpose and behaviours (see **Section 2** above)?
- Which solution complies with:
 - Applicable laws and regulations?
 - Our policies and procedures?
 - Ethical conduct founded on honesty, integrity and transparency?

Remember that, in case of doubt, you can always find support and guidance from your manager, HR and legal teams.

3.2 Our suppliers

We are committed to promoting our behaviours and engagements as described in this Code.

We therefore require our suppliers to adhere to these principles which are embedded in our **Supplier Code of Conduct**.

4. Our commitment to our people

4.1 Human rights

We protect and promote human rights.

Our respect for human rights is fundamental to the way we manage our business.

Human rights are fundamental rights and freedoms that all people are entitled to, regardless of gender, color, belief, ancestry, ethnic or national origin, sexual orientation, age, disability, union or political opinion, family status, or any other classification.

Aliaxis is committed to protecting and promoting human rights and condemns any form of human rights abuse.

We support the rights expressed in the Universal Declaration of Human Rights, and the principles concerning fundamental rights as set out in the Declaration of the International Labour Organization on the Fundamental Principles and Rights at Work.

Every member of Aliaxis People and of our Business Partners must be treated with dignity and respect.

4.2 Health and safety

We protect our people's health and safety.

Aliaxis is committed to promoting the physical and mental wellbeing in the workplace, ensuring that our operations are safe for our people, and preventing work related injury and illness.

This commitment extends not only to our People, but also to suppliers, visitors on our sites and all communities impacted by our activities.

We have the goal to be a world-class safety leader, with ambitious targets as we know nothing is more important than providing a safe work environment.

Here are our **Go for Zero Principles**:

1. Compliance with laws and regulations governing workplace safety and health is the minimum for us
2. Operating responsibly is the only way for us to be financially successful in the longer term
3. Health & Safety and Environment Sustainability ("HSE") is a line management responsibility, and HSE results are an indicator of leadership
4. Excellence in HSE requires a proactive and collaborative approach
5. Robust management of risks & impacts requires a management system approach
6. We can positively impact HSE beyond our own operations, up and down our value chain
7. One incident is one too many – we are going for zero harm

The above principles are embedded in our **Global Labour Standards Policy** and our **Health, Safety, and Environmental Sustainability Policy**.

4.3 Fair working hours and remuneration

We offer fair working hours and compensation to our people.

Aliaxis People are a key factor of the reputation, success and growth of the Group.

Aliaxis is committed to creating fair working conditions for our People. This includes, among others, paying adequate and equal remuneration for equal work or work of equal value, avoiding excessive working hours, and developing flexible solutions that promote a sound work-life balance.

Aliaxis establishes working and compensation conditions that are in line with labour laws, regulations and market practices applicable in the relevant jurisdictions and sectors of employment, including in relation to minimal wages.

The above principles are embedded in our **Global Labour Standards Policy**.

4.4 No child, forced or compulsory labour

We prohibit child, forced or compulsory labour.

Aliaxis strictly prohibits all forms of child labour and forced or compulsory labour, including but not limited to servitude, human trafficking, slavery, bonded or forced prison labour.

We promote and respect these principles by implementing controls and measures aimed at ensuring that child labour or forced or compulsory labour is not taking place anywhere within Aliaxis or its supply chain.

The above principles are embedded in our **Global Labour Standards Policy**.

4.5 Diversity, equity and inclusion

We promote diversity, equity and inclusion.

Diversity and inclusion are a source of strength for Aliaxis.

We are convinced that the diversity of our workforce, markets and stakeholders benefits our People's wellbeing and Aliaxis' business growth and performance.

We encourage and support diversity and inclusion at all levels of the Group by providing equal opportunities, respect and trust to all Aliaxis People (see below **4.6** and **4.7**).

The above principles are embedded in our **Diversity, Equity and Inclusion Policy**.

4.6 No discrimination

We provide equal opportunities and treatment to our people.

The fair and equitable treatment of Aliaxis People, Business Partners and any other persons is critical to fulfilling Aliaxis' purpose and behaviours.

We believe that employment and career development decisions must be based only on the merits; we respect the rights, culture, diversity and dignity of all our people, and do not consider any of those to treat them differently.

Aliaxis is committed to offering all its people equal opportunities with respect to – but not limited to – practices and policies on hiring, compensation, training, development and promotion.

We conduct our business without discrimination on age, disability (physical or mental), medical condition, gender (including gender identity, fluidity, transition, or expression), nationality, ethnic background, or ethnic origin, religious or political beliefs, sex (including sexual orientation), pregnancy (including childbirth, breastfeeding), parental leave, maternity leave, and paternity leave, social origin, military service, family or marital status, or any other protected ground (characteristic or activity) of discrimination under applicable law. We adopt an inclusive and meritocratic approach, basing our decisions only on objective factors like skills, qualifications, performance and business needs.

Aliaxis does not tolerate and responds seriously to any form of discrimination, including but not limited to discrimination based on any of the above classifications.

These principles are embedded in our **Global Labour Standards Policy**.

4.7 No harassment

We do not tolerate any form of harassment.

Aliaxis has zero-tolerance towards and strictly prohibits any form of harassment in the workplace.

Harassment can be defined as any conduct that creates an intimidating, hostile or offensive work environment.

Harassment can be verbal, physical, visual or sexual in nature. It includes but is not limited to intimidation, threats, bullying, slurs or derogatory comments, sharing offensive material, or making offensive or suggestive jokes or comments, including unwelcome sexual requests, advances or touching.

The above principles are embedded in our **Global Labour Standards Policy**.

4.8 Freedom of association and right to collective bargaining

We protect our people's rights to freedom of association and to collective bargaining.

All Aliaxis People benefit from freedom of association and are entitled to form and join trade unions. They also have the right to engage in collective bargaining.

The above principles are embedded in our **Global Labour Standards Policy**.

5. Our commitment to sustainability

Aliaxis' purpose is to bring solutions to the world's water challenges and accelerate the transition to clean energy.

Our Environmental, Social, and Governance program ("ESG") helps us to:

- **E:** protect the environment with climate resilient solutions and live up to our commitment to reduce our environmental footprint
- **S:** embrace social issues and make a lasting positive impact for a better society
- **G:** ensure the right decisions are taken at all levels of the organization, including through Aliaxis' leadership teams, policies and processes, by embedding sustainability in everything we do

5.1 Environment

We comply with all applicable environmental laws, rules, regulations. Furthermore, we are committed to reducing waste, the use of energy, preserving water, and increasing our efforts to decarbonize our operations and make our production circular.

These principles are notably embedded in the following policies and standards:

- [Health, Safety and Environmental Sustainability Policy](#)
- [Energy and Green House Gases Standard](#)
- [Waste Management Standard](#)

This list is evolving as Aliaxis is committed to adopting further policies to provide strong foundations to its commitment to sustainability.

5.2 Social

We are committed to dedicating our activities to improving water access for local communities in the regions in which we operate.

We are committed to our people (see [Section 4](#) above) and empower our teams to make a positive impact on local communities through various programs.

5.3 Governance

We are committed to doing business with integrity and high compliance standards (see also [Section 6](#) below). Additionally, we are committed to embedding ethics in every process of our value chain.

6. Our commitment to comply with the law

6.1 Compliance and business ethics

We conduct all our activities in compliance with all applicable laws and regulations.

Compliance is part of our license to do business.

We are committed to dealing fairly and honestly with our People, Business Partners and competitors. We behave in an ethical manner and do not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair business practice.

Our culture of compliance and integrity is supported and enforced by all Aliaxis Companies and members of management. Any conflict between local laws and regulations and this Code of Ethics should be brought to the attention of the legal department.

Each of us is responsible for complying with applicable laws and internal policies, nurturing and perpetuating our high ethical standards throughout our activities.

6.2 Fair competition

We are committed to compete fairly.

Competition and antitrust laws and regulations protect enterprises and consumers by safeguarding fair competition.

Aliaxis competes in global markets based on the good reputation and quality of its products and services. We always conduct our business honestly and fairly.

Aliaxis strictly prohibits engaging in anti-competitive practices. This includes but is not limited to aligning

prices or allocating markets with competitors, restricting output, rigging bids, or coercing Business Partners.

Aliaxis implemented a **Competition Law Policy** to prevent unlawful conduct in this context.

6.3 Anti-bribery and corruption

We are committed to fighting bribery and corruption.

We operate a zero-tolerance policy towards bribery and corruption events or attempts in all business dealings and transactions. Local custom and practice, or absence of local regulation, are never a justification for departing from such zero-tolerance policy and our commitment to fight corruption.

Facilitation payments, which consist of small unofficial payments made to expedite or secure routine governmental action, are also prohibited, no matter if they are allowed by local laws.

Aliaxis implemented an **Anti-Bribery and Corruption Policy** designed to prevent, detect and report any event of bribery or corruption.

We exercise caution and good judgment when offering or accepting gifts or hospitality.

6.4 Conflicts of interest

We are committed to preventing, managing and resolving conflicts of interest.

A conflict of interests arises where personal interests (could) conflict or interfere with an Aliaxis interest. A personal interest may be financial or non-financial, for ourselves or a family member or associate.

We must ensure that our personal activities do not conflict with the interests of Aliaxis Companies and that we always act objectively, transparently, fairly, and in the interest of Aliaxis.

Aliaxis aims to prevent conflicts of interest, and, if they arise, to deal with them in an ethical and responsible way, in order to mitigate related risks and protect the interests of the Group and its companies.

Aliaxis People must disclose any actual or potential conflict of interest, in accordance with our **Conflicts of Interest Policy**.

6.5 Trade compliance

We are committed to complying with trade compliance laws and regulations.

This includes rules governing economic and financial sanctions and trade controls, such as embargoes and restrictions on the import and export of goods and services across national borders. We operate our business activities in accordance with such applicable laws and regulations.

We do not conduct unauthorized business with countries, regions, governments or Business Partners that are subject to trade embargoes or economic or financial sanctions.

Aliaxis implemented a **Trade Compliance Policy** to provide guidance in this context and ensure we comply with trade related laws and regulations.

6.6 Anti-money laundering

We take measures to avoid being used for money laundering purposes.

Money laundering is the process where funds generated through criminal activity are moved through legitimate businesses to hide their criminal origin.

Aliaxis strictly prohibits Aliaxis People from participating in money laundering.

We take measures to prevent the risk of being used by criminals for money laundering purposes.

6.7 Prohibition of market abuse

We prohibit disclosing unlawfully inside information and trading on such information.

In the course of our work, we may learn material non-public information about Aliaxis or a publicly traded company with which we conduct business. Such information must be kept confidential and not be used for transacting in related securities.

Aliaxis People are prohibited from interfering with the free and fair operation of the market, e.g., by disseminating or transmitting confidential, misleading or false information on a listed company.

Aliaxis implemented a **Market Abuse Policy** to prevent any such unlawful conduct and comply with its own obligations in this context.

6.8 Privacy and data protection

We protect privacy and personal data.

Aliaxis takes seriously its responsibility and obligation to handle the personal data of its People, Business Partners and stakeholders, in a lawful, professional and ethical way. By protecting their personal data, we demonstrate our commitment to respect their privacy.

We only collect, use, process and store personal data and information that is necessary for legitimate business purposes. We do so in accordance with applicable privacy and data protection laws and regulations.

Aliaxis implemented a **Privacy Policy** to provide guidance on the above.

6.9 Accurate records and prevention of fraud

We maintain accurate business and financial records.

We are committed to preparing financial records with care and honesty, in compliance with applicable laws and accounting principles. This includes, for instance, account books, financial reports, expense reports, disclosure statements, and regulatory filings.

Aliaxis has zero-tolerance towards false or misleading business or financial statements. Undisclosed or unrecorded operation such as off-book accounts are strictly prohibited. We take measures to detect, prevent, and respond to fraud.

7. Our commitment to protect our assets

7.1 Intellectual property

We protect intellectual property.

Intellectual property includes, among others, patents, trademarks, designs, copyrights, trade secrets, and research and development – such as ideas, drawings, samples, models, know-how and notes.

All intellectual property rights generated by Aliaxis People within the scope of their work belong to Aliaxis.

Protecting Aliaxis' intellectual property is crucial to safeguard the value, development and future of our Group and our People. Such intellectual property can only be used for legitimate business purposes and for the performance of our business activities.

In addition, we are responsible for respecting and protecting the intellectual property of our Business Partners in the conduct of our activities.

Aliaxis implemented an **Intellectual Property Policy** providing further guidance on the matter.

7.2 Confidential information

We protect confidential information.

Confidential information is any information that is not available to the public or has not been published or widely disseminated. This includes non-public information about Aliaxis as well as certain information about our Business Partners.

Aliaxis People may have knowledge of confidential and proprietary information about the products, services and business of the Group and its Business

Partners. This information is vital to Aliaxis' success and must be protected.

We maintain, as a rule, the confidentiality of the information entrusted to us within the course of business. We take all reasonable efforts to safeguard confidential information in our possession, refrain from sharing it with third parties, protect it from inadvertent disclosure, and comply with non-disclosure obligations imposed by Aliaxis or its Business Partners.

7.3 Physical property

We care for and protect the assets of Aliaxis.

Aliaxis entrusts its People with physical property and resources to help us do our jobs.

This includes, among others, the buildings we work in, the equipment and materials we work with, but also the inventory, vehicles, computers and mobile devices we use.

We use them to conduct our business activities and must protect them from damage, loss, theft and misuse.

8. Training, reporting & violations

8.1 Training

We are committed to training our People.

Aliaxis provides regular training to its People regarding the Code and our regulatory obligations (including competition law, anti-bribery and corruption, privacy, etc.) to improve our People's know-how and competences and to ensure that Aliaxis' commitments are well understood and followed by Aliaxis People.

8.2 Reporting

We encourage our People to report any concerns.

Aliaxis values honesty, integrity, and efforts made by its People to protect Aliaxis Companies, Aliaxis People and the Group.

Each of us is required to report immediately any (even suspected) violation of laws, regulations or internal policies. This includes but is not limited to reporting any violation of this Code.

Aliaxis provides secure and confidential channels to report concerns internally, including but not limited via managers and the Global Alert Channel.

Our **Whistleblowing Policy** provides additional guidance on the matter.

Aliaxis protects member of its People, who reports concerns or misconduct in good faith, from any form of discrimination or retaliation.

By reporting a misconduct, you are doing the right thing!

8.3 Violations

Aliaxis will deal with any instance of (suspected) violations of the Code seriously.

Any Aliaxis Person who violates the Code or any internal policy, procedure or rule referred to in the Code may be subject to disciplinary action, up to and including termination of employment or contract.

Depending on the circumstances, Aliaxis may also refer them to competent regulatory and/or criminal authorities, taking into account applicable local laws and internal rules.



See misconduct or violations at work?
Shed some light on it ...

...if you believe there is a fraud, abuse or any other misconduct in the workplace. At Aliaxis, we expect all employees to comply with the applicable laws and group policies.

Global Alert Channel
(available anonymously)



Online form via the QR Code or aliaxis.com/alert
Email: alert@aliaxis.com

More information on our Whistleblowing policy available on the Ethics and Compliance Intranet



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