

SCHEDULE SR2 TO THE SALES REPRESENTATIVE AGREEMENT

Alimak Hek Code of Conduct for Distributors and Sales Representatives

Alimak Hek is committed to high standards of business ethics and integrity. Therefore, Alimak Hek expects all of its distributors and sales representatives (“**Representative**” or “**Representatives**”) to adhere to equally good working standards and business ethics.

This Code of Conduct sets forth Alimak Hek’s expectations in relation to a distributor and sales representative relationship. It is built on the UN Global Compact’s ten fundamental principles which Alimak Hek endorses and works systematically to observe and promote.

This Code of Conduct applies to all Representatives irrespective of country and territory, but if local laws, regulations or standards in the respective territory are stricter than this Code of Conduct, the Representative is required to follow such stricter rules.

A. Human Rights

In accordance with the aforementioned ethics and standards, Alimak Hek requests the following general business practices from Representatives:

- to respect the personal dignity, privacy and rights of each individual;
- to refuse to employ or make anyone work against his or her will;
- to prohibit unsuitable behavior including gestures, language and physical contact that is sexual, coercive, threatening, abusive and/or exploitative in nature.

B. Fair Labor Conditions

The Representative will ensure fair labor conditions. In particular, it will

- not engage in or support discrimination on the basis of race, color, gender, language, religion, political or other opinion, caste, national or social origin, union affiliation, sexual orientation, age or disability.
- provide pay and benefits that comply with all applicable local laws and regulations including those relating to minimum wages, overtime hours and other elements of compensation.
- only allow disciplinary measures which are necessary, legitimate and fully transparent and which are proportional to the offence committed.
- not use nor condone the use of bodily punishment, physical or mental compulsion or verbal abuse and/or threats.

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C. Forced labor and child labor

Employment with the Representative should be an expression of free choice and there must be no forced or involuntary labor as well as no child labor under any circumstances.

D. Freedom of association

The Representative's employees must have the opportunity to join or refrain from joining worker associations, including trade unions.

E. Occupational Health and Safety

The Representative will provide a safe and healthy workplace for all of its employees ensuring that employees shall have appropriate protective equipment and be sufficiently trained to perform their tasks and must obey all applicable laws and regulations in relation to it.

F. Environmental Responsibility

Alimak Hek is committed to a clean environment.

The Representative is committed to environmental protection and will conduct its business in an environmentally responsible manner.

G. Anti-corruption

Alimak Hek is committed to conducting its business free from extortion, bribery and all unlawful, unethical or fraudulent activity. Representatives must not offer, give, promise or authorize any bribe, gift, loan, fee, reward or other advantage to any government official or employee, any customer, any Alimak Hek employee or any other person to obtain any business advantage or improperly influence any action or decision. The Representative must comply with all applicable local and international anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. The Representative must ensure that it and its personnel and other persons working on its behalf are aware of and will take all necessary steps to comply with such laws and regulations.

H. Fair competition

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Alimak Hek is committed to the principle of fair, open, undistorted and unrestricted competition. Competition laws enacted in certain countries are designed to ensure that competition remains vigorous and free from restriction. Even the perception of improper conduct must be avoided. The Representative is required to comply with all applicable competition and antitrust laws and regulations.

I. Fraud

Alimak Hek has a zero tolerance to fraud, which is the act or intent of cheating, tricking, stealing, deceiving, misrepresenting or lying for any personal or professional advantage. Fraud is dishonest and incompatible with Alimak Hek's values and culture. Allegations of fraud will be investigated and referred to law enforcement for criminal prosecution when warranted.

J. Confidentiality, insider trading and intellectual property

Alimak Hek's business information is very valuable and must be protected. The Representative is expected to respect Alimak Hek's proprietary and confidential information, not to disclose it to any unauthorized third party, and only use it for Alimak Hek's legitimate business. In addition, information provided to Alimak Hek or the Representative in good faith by its customers and business partners must be treated with the same degree of confidentiality.

The Representative must ensure that non-public information obtained in the course of its business relationship with Alimak Hek is not used for the personal benefit of the Representative, its employees or other persons. The Representative shall respect intellectual property rights and confidential information belonging to third parties and must not infringe upon the intellectual property of others.

K. Data protection

Representative must ensure respect of data privacy of both employees and customers. When obtaining and processing personal data, the Representative must observe any applicable laws and regulations on the processing of personal data and pay specific attention to compliance with applicable laws and regulations on the processing of sensitive personal data.

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L. Conflicts of interest

The Representative is required to identify and avoid situations where there is an actual conflict of interest or even the appearance of a conflict of interest. It is important that business decisions are not improperly influenced by personal interests or relationships. This applies also to the Representative's interactions with Alimak Hek employees.

M. Export control and trade restrictions

The Representative must comply with all applicable laws and regulations which restrict trade with and export to certain countries, organizations and individuals.

N. Change of original documents issued by Alimak Hek

The Representative must never change, revise or adjust original documents such as brochures, drawings, technical drawings, pictures or invoices and shipping documents issued by Alimak Hek.

O. Failure to Comply

Failure to observe this Code of Conduct will be reported to the Representative's management for their attention and corrective action. Non-compliance will always be considered a material breach of the Distribution Agreement and may lead to termination of the Distribution Agreement.