

# Halma Supplier Code of Conduct



# Halma

Version 1.1 - November 2025

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# Introduction



# A message from our CEO

Welcome to Halma's Supplier Code of Conduct.

Halma's purpose is to grow a safer, cleaner, healthier future for everyone, every day. Our commitment to operating ethically and sustainably remains at the heart of all that we do and is within the cultural DNA of Halma companies. As such, Halma and its operating companies base supplier relationships on lawful, fair and ethical business conduct and practices.

Our Supplier Code of Conduct sets out the standards by which we expect our suppliers and business partner to conduct their business, and is aligned to Halma's own Code of Conduct, entitled ["Just be a Good Person"](#). As highlighted there, we all share a responsibility to ensure ethical business practices and as Halma we are committed to ensuring we never knowingly compromise ethics or integrity to achieve a commercial outcome.

Our intent is that by upholding the standards contained within our own, and our Supplier Code of Conduct, and holding each other accountable, we can ensure a sustainable and ethical foundation for our collective success.

Regards,



**Marc Ronchetti**  
Group Chief Executive



**"We operate ethically,  
transparently and with  
integrity in all that we do."**

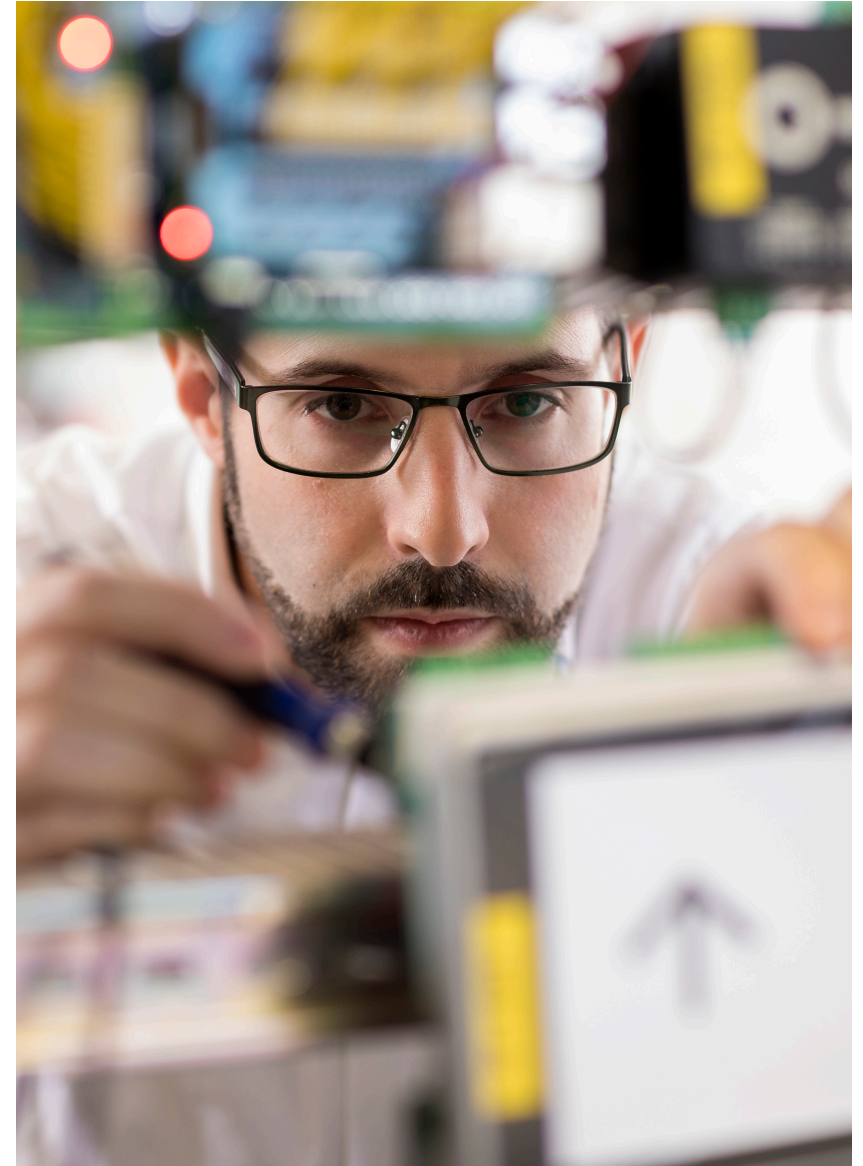


# Purpose and Scope

This Halma Supplier Code of Conduct ("Code" or "Supplier Code of Conduct") sets out the minimum standards expected of Halma, and its subsidiary companies (i.e. "Halma's") suppliers and business partners as well as their employees. It covers legal, ethical, social and environmental responsibilities. This Code sits alongside, and is aligned to, Halma's own Code of Conduct ("Just be a Good Person").

We expect our suppliers to adhere to all applicable legal and regulatory requirements in all of their dealings with us. Where there is divergence between local laws and regulations and the standards set out in this Code, suppliers should adopt the higher standard, unless the local law does not allow for this.

Halma operates a decentralised business model, therefore individual Halma operating companies may have additional requirements of their suppliers, depending on their unique operating context. This document outlines the core, minimum standards we expect all suppliers to meet or exceed.



**Integrity towards  
people and the  
planet**





# Human Rights and Labour Standards

Halma is committed to respecting human rights wherever we do business. We will give effect to this commitment by working to implement and strengthen practices and procedures to prevent, mitigate and, where appropriate, remedy adverse human rights impacts that may result directly from our operations or that may be linked directly to our business through our relationships with suppliers<sup>1</sup>.

Halma expects suppliers to uphold the principles of the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work including the conventions relating to:

1. The effective abolition of child labour;
2. The elimination of all forms of forced or compulsory labour;
3. Freedom of association and the effective recognition of the right to collective bargaining;
4. The elimination of discrimination in respect of employment and occupation; and
5. A safe and healthy working environment.

Halma also expects its suppliers to conduct business activities in a manner which is compliant with local employment laws and minimum standards ensuring appropriate compensation and working hours.

## Prohibit the use of child labour

Suppliers must always adhere to the minimum age limit for work, as defined by national laws and/or regulations, and comply with relevant International Labor Organization (ILO) standards. No children under the age of 18 are permitted to perform hazardous work that exposes them to health, safety or moral danger or harm, or that improperly interferes with their educational development.

<sup>1</sup> Our commitment and implementing practices and procedures are informed by international instruments, including the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and by the guidance set forth in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.



# Human Rights and Labour Standards

## Prohibit all Forms of Forced or Compulsory Labor

Suppliers must not, under any circumstances, participate in human trafficking; forced, involuntary, or slave labour; or purchase materials or services from companies using forced, involuntary, or slave labour. All work must be voluntary, and workers must be free to leave their employment after reasonable notice. Workers should not be required to lodge “deposits” or their identity papers with their employer.

## Freedom of Association and Collective Bargaining

Where in conformance with local law, it is expected that suppliers must respect and adopt a non-discriminatory attitude towards the activities of trade unions and their organisational activities. Workers’ representatives must not be discriminated against and must have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the supplier will facilitate and not hinder the development of parallel means for independent and free association and bargaining.

## Non-discrimination

Suppliers must commit to a workplace free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination or harassment based on race, marital status, caste, national origin, religion, age, disability, gender, sexual orientation, union membership or political affiliation in hiring and employment practices such as wages, promotions, rewards, and access to training, promotion, termination or retirement.





# Human Rights and Labour Standards

## Safe Working Conditions

Suppliers must provide workers with a safe and healthy work environment in accordance with all applicable health and safety laws, regulations and standards and must provide access to safe and clean sanitation facilities as well as potable water. Suppliers must take proactive measures that support accident prevention and minimize health and safety risk exposure in their operations.

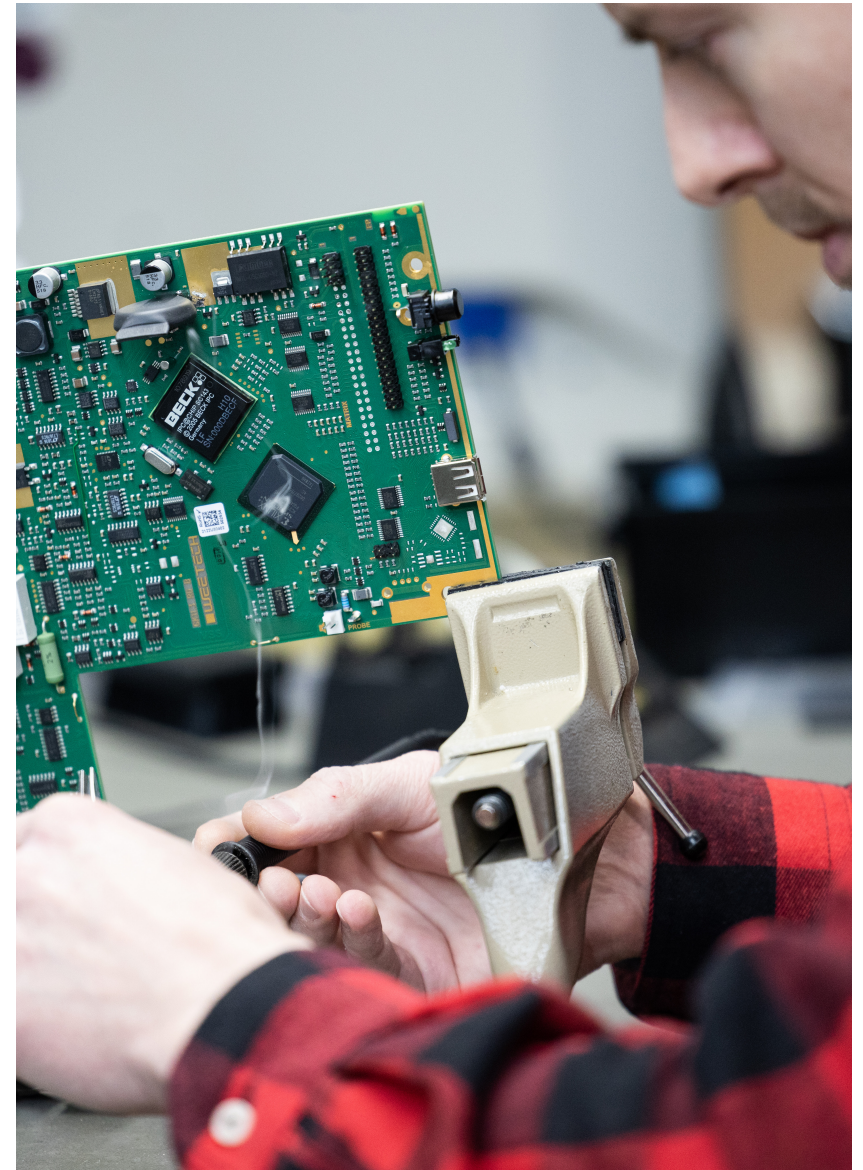
Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

## Compensation and Working Hours

Employees of our suppliers shall be paid wages and benefits that meet or exceed minimum national legal requirements. Employees of our suppliers shall work hours that do not exceed national laws.

## Conflict minerals

Suppliers that provide Halma with goods containing tin, tantalum, tungsten or gold must exercise due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to determine whether those metals have directly or indirectly financed or benefited armed groups and security forces. Suppliers must be able to provide us with their policies, procedures and due diligence reports.



# Environmental Responsibility

Suppliers are expected to conduct their operations in a way which minimises the impact on the environment, protect and reduce the use of natural resources through their operations and supply chain, and strive for continual improvement in environmental protection. Suppliers must ensure their operations comply with all environmental laws and regulations and international conventions on environmental standards. Suppliers must ensure that all required environmental permits, approvals, and registrations are obtained and maintained.

## Greenhouse Gas Emissions

In particular, suppliers should take steps to reduce their greenhouse gas emissions and support Halma's decarbonisation ambition to reach Net Zero for all emissions by 2050. Halma wishes to work with suppliers that proactively strive to create low carbon products and facilities. Suppliers are expected to share their efforts to minimise their carbon footprint.

## Substances of Concern

All suppliers should provide, on request, product compliance information, including (but not limited to) EU REACH, RoHS and PFAS compliance declarations.





# Integrity in business





# Governance Standards

We strive to operate ethically, and with transparency and integrity in all that we do. As a global business, we are committed to complying with international trade laws. We only want to work with business partners that share our commitment to ethics and integrity and therefore expect our suppliers to have similar policies in place to ensure trade is ethical as per the policies outlined in Halma's Code of Conduct available on [Halma's website](#), including in relation to:

## Anti-Bribery and Corruption

Suppliers must be made aware of Halma's anti-bribery and corruption policies and procedures and are expected to comply with Halma's anti-bribery and corruption principles as set out in Halma's Code of Conduct as well as all applicable anti-bribery and corruption laws.

## Conflicts of Interest

Suppliers must promptly disclose to us any actual or potential conflicts of interest and take proactive measures to avoid situations that could compromise, or appear to compromise, their objectivity or the integrity of their business relationship with us.

## Data Privacy and Protection

Suppliers must safeguard all intellectual property and confidential information entrusted to them, ensuring it is used solely for authorized business purposes, protected against unauthorized access or disclosure, and handled with the highest standards of security and discretion.

All suppliers must comply with Halma's data protection principles as set out in Halma's Code of Conduct as well as all applicable GDPR and data protection laws when handling Group personal data.



# Governance Standards

## International Trade Laws, Anti-Money Laundering and Anti-Tax Evasion

All suppliers are required to comply with applicable trade and export controls and must inform us if items they are supplying to us are controlled.

All suppliers are required to comply with all applicable Anti-Money Laundering, Counter-Terrorism and Anti-Tax Evasion laws and regulations and notify us if they become aware of any such offence being committed by one of our associates or personnel.

## Anti-fraud

All suppliers must ensure compliance with all applicable anti-fraud laws and regulations and ensure they, and their employees, understand key principles around fraud prevention and detection and have adequate procedures in place. Instances of actual or suspected fraud involving one of our associates or personnel must be disclosed to us. The supplier must cooperate fully and in good faith with any investigation conducted by us, including providing access to relevant records, personnel, and information, subject to applicable data protection and confidentiality obligations.

## Competing fairly

Suppliers must comply with all applicable competition and antitrust laws.





# Due diligence and risk management





# Due Diligence and Risk Management Expectations

This code is being introduced for suppliers on a phased basis by Halma companies. Our companies are working towards ensuring appropriate checks are in place to ensure that suppliers meet or exceed the requirements contained herein. Recognising the diversified and global nature of Halma's business, this Code may be updated from time to time to reflect evolving legal and best practice requirements.

Halma expects suppliers to support requests to obtain documentation for the purposes of assessing performance against this Code and reserves the right to request and/or perform supplier audits. Depending on the severity of impact or non-compliance, this may result in contract suspension and legal action, although we are committed to working with our suppliers in the first instance.

Suppliers shall comply with all laws regarding public reporting or disclosure on human rights and environmental due diligence (e.g. conflict minerals, modern slavery and child labour). Suppliers shall maintain relevant documentation of their due diligence and provide this to Halma upon request.

Where not explicitly required by law, suppliers are also encouraged to conduct their own social and environmental due diligence within their supply chains, to cascade the principles contained in this Code to their own suppliers, and to establish accessible grievance mechanisms for workers and stakeholders and cooperate in remediation efforts where adverse impacts are identified.

## Reporting concerns

Suppliers must notify us of any actual breach of this Code in a timely manner and agree with Halma a plan for corrective action to remediate any adverse impacts.

Anyone may report a suspected violation of Halma's Supplier Code of Conduct confidentially via Halma's online [Whistleblowing Hotline](#). Please refer to Halma's Whistleblowing Policy, and all other applicable policies available on [Halma's website](#).



## Halma Supplier Code of Conduct

We, the Supplier, acknowledge receipt of Halma's Supplier Code of Conduct version 1.1 (2025) and hereby confirm that we have read, understood, and agree to comply with its requirements.

**Supplier company name**

.....

**Name of authorised signatory**

.....

**Position/job title**

.....

**Signature**

.....

**Date**

.....



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