

**Just be a  
good person**

The Halma Code  
of Conduct

**Halma**



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# Halma's purpose and DNA

Our purpose is to grow a **safer, cleaner, healthier** future for everyone, every day.

Our purpose drives every business decision we make, from choosing our markets to finding the right talent. Our companies are all aligned with our purpose. They develop technologies which help solve some of the world's most pressing issues, from air quality to clean water to road safety and preventable blindness.

We have a unique set of organisational and cultural genes which power our continued growth. We call this Halma's DNA. Halma's DNA runs through our business at all levels. It provides a competitive advantage and core stability, and allows us to continuously adapt to new market needs. We expect all employees of Halma and its companies to always act ethically and in alignment with Halma's purpose and DNA.

We have five unique cultural and behavioural principles that we require, protect and leverage to effectively optimise our organisational genes and deliver our purpose. These are to:

- **Live the purpose:** Be passionate about making the world safer, cleaner, and healthier. See real problems and create innovative solutions.
- **Embrace the adventure:** Continually grow and change, as individuals and collectively. Challenge assumptions and see opportunities. Seek insight from all directions and leverage diverse points of view.
- **Be an entrepreneur:** Be an owner, risk-taker, visionary. Transform bold ambitions into reality. Be agile and responsive in the face of constant change. Be successful through and with others.
- **Say yes, and...:** Choose Yes, and... to seemingly conflicting priorities. Build for tomorrow and deliver today. Have stability and constantly evolve. Enjoy autonomy and eagerly collaborate to accomplish our goals.
- **Just be a good person:** Play to win, but not at the expense of others. Operate with impeccable ethics, transparency and integrity in all that you do.



Just be a good  
person: Our code



# A message from our CEO

Welcome to 'Just be a good person', Halma's Code of Conduct.

As Halma continues to strive towards growing a safer, cleaner and healthier future for everyone, every day, our commitment to operating ethically and sustainably remains at the heart of all that we do. 'Just be a good person' is the title of our code of conduct because it is a crucial part of our DNA, and summarises our commitment: 'Play to win, but not at the expense of others. Operate with impeccable ethics, transparency and integrity in all that you do'. This sets out the standards by which we conduct our business. We expect our business partners to act with similarly high ethical standards.

We take 'Just be a good person' seriously. It enables us to live our purpose and deliver on our strategy. It also protects each of us, helping us to identify and avoid situations that fall beneath our expectations of each other or could be in breach of relevant laws. 'Just be a good person' sets out the standards that we expect will govern the activities of Halma, our companies, our employees and our business partners. It gives guidance on recognising when and where ethical problems exist, how to avoid them and what to do if they cannot be avoided.

Halma will never ask or expect an employee to compromise their commitment to ethical business and integrity to achieve a target or a commercial outcome.

We all share responsibility for ensuring that, individually and collectively, we commit to 'Just be a good person'. We all play a vital role in Halma's future. Only by working together in line with Halma's DNA and holding each other to account to the standards set out here will we fulfil our purpose and deliver our strategy.

Regards,



**Marc Ronchetti**  
Group Chief Executive



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

# Commitment to the code

Please read and comply with our Code and complete all mandatory compliance training provided by Halma and your company. If these do not give you enough guidance about how to deal with a particular situation, speak to your line manager or the contact set out in the relevant policy. If you see an employee or business partner behaving unethically or acting contrary to the Code, please speak up. We will listen.

Compliance with the Code is required by each and every employee of Halma and our companies worldwide. Non-compliance is a very serious matter and can have a variety of consequences. A failure to comply with our Code could expose both the business and you in your individual capacity to prosecution and fines. Just as importantly, it can lead our employees, customers, partners and investors to lose confidence in us.



# Our responsibilities



# We make the right decision

At Halma, we strive to make the best and most ethical decisions for our business, our stakeholders and the planet.

If you are ever confused as to what that decision should be, ask yourself the following questions:

1

## Do I have all the facts?

Gather all necessary information - if you are missing anything, ask for it.

2

## What will the consequence of the decision be?

Think about who or what it might positively or negatively impact.

3

## Am I making the decision in the best interest of the business?

Consider your motivations and check they are not influenced by personal biases or pressures.

4

## Is it consistent with our Code and our cultural DNA?

Ensure you understand our Code and cultural DNA.

5

## Is it legal? Is it permitted under Halma's policies?

Consider all Halma's requirements.

If you answer "no" or "don't know" to any of the above questions, **stop** and **discuss** with your line manager or reach out to subject matter experts.



# We speak up

## Our commitments

We believe in acting with integrity and doing the right thing. We all have a responsibility to speak up when we have concerns about conduct that could violate our Code, our policies or the law.

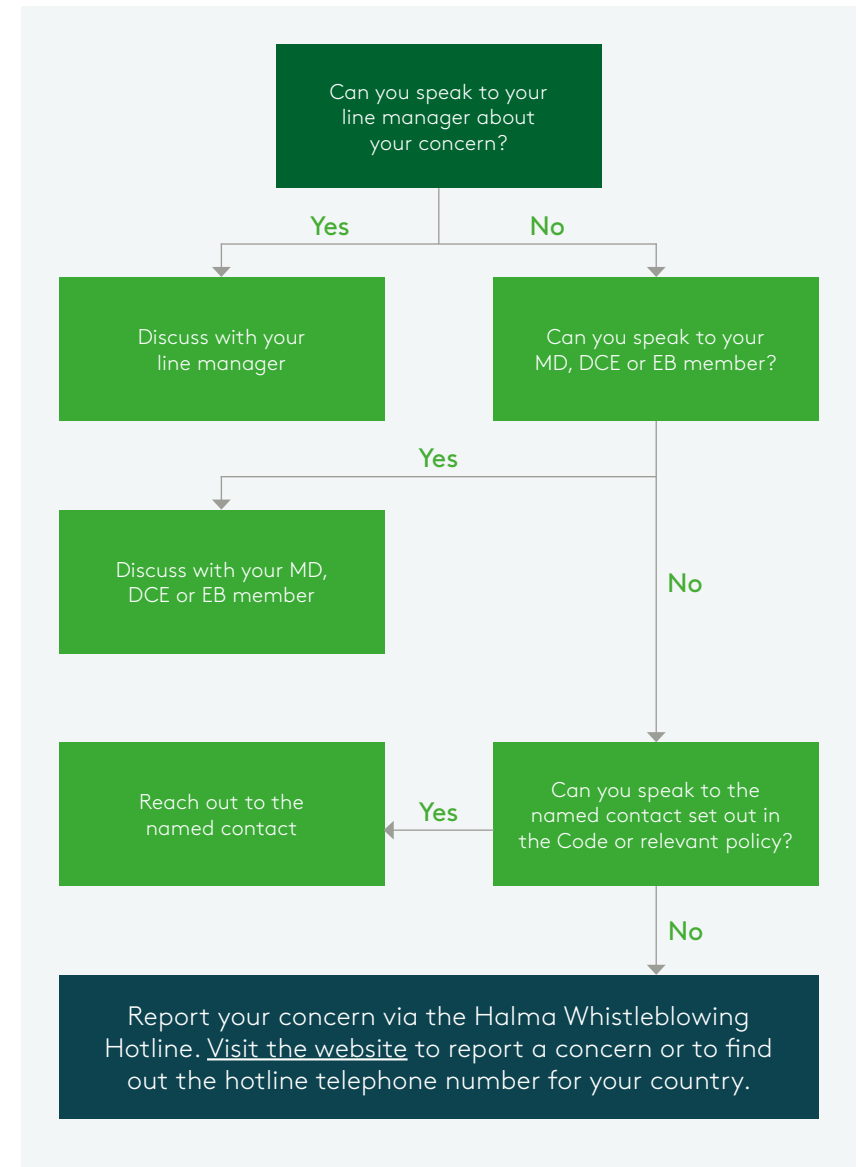
We listen to all concerns raised and treat them seriously. We don't tolerate retaliation or harassment in any form.

If you want to raise a concern, we have various reporting channels that you can use, including the Halma Whistleblowing hotline, which is available every day of the week, at any time.

All concerns will be investigated in accordance with local law.

## Your role and responsibilities

- Speak up and report any conduct that you believe violates our Code, policies or law or otherwise believe to be unethical;
- Act in good faith - provide honest and accurate information and do not deliberately make a false report;
- Co-operate fully with any investigation or review. Provide all information that is requested and ensure that your answers are true and not misleading in any form; and
- If your role is to investigate a concern, do so in a sensitive and thorough manner in line with [Halma's Investigation Policy](#).



# Integrity in business

“We strive to  
operate ethically,  
and with  
transparency and  
integrity in all  
that we do.”



# Anti-bribery and corruption

## Our commitments

At Halma we operate ethically, transparently, and with integrity in all that we do. Our success is propelled by our purpose and our DNA. Our companies live our purpose. Our DNA does not accommodate any form of bribery and corrupt practices and we consider such activity to be unethical and contrary to good corporate governance.

We are committed to ensuring adequate **Anti-Bribery and Corruption controls** are in place to comply with anti-bribery and corruption laws at all times. We expect the same behaviour from all our employees, **as well as third parties who represent us**, or that we do business with.

## Your role and responsibilities

- Never accept, request, offer or pay a bribe, kickback or any other kind of improper payment, including facilitation payments (unless there is an immediate threat to life and safety);
- Be aware of bribery and corruption risk factors (see box on the right-hand side);
- Keep **accurate books and records** so that payments are honestly described and not inadvertently used for unlawful purposes; and
- Comply with your local anti-bribery and corruption laws and regulations and Halma's **Anti-Bribery & Corruption Policy**.

### What is a bribe?

A bribe is a financial or non-financial advantage, promised, requested or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so. A bribe can include money, gifts, hospitality, expenses, reciprocal favours, political or charitable contributions. It can be anything of value, not just money.

### What is a facilitation payment?

A payment (cash or something of value, often known as a "grease payment") made to a public official to either expedite or guarantee the performance of a routine governmental action.

### Things to watch out for:

- **Identity verification** – your customer, supplier or partner is reluctant to provide documents to verify their legal status or provides unusual or inconsistent information.
- **Country risk** – take extra care when doing business in a high-risk country from a bribery and corruption perspective.
- **Transaction structure** – if you're selling through a third-party intermediary such as a distributor or reseller, be curious about the final customer.
- **State-owned entities** – public officials and entities are subject to more restrictions from an anti-bribery and corruption perspective.
- **Reputation** – consider it a red flag if your business contact is known or suspected to have engaged in criminality previously.
- **Behaviour** – report internally if your business contact demands a commission or fee payment e.g. before signing an agreement or to 'facilitate' moving goods through customs.

# Gifts and entertainment

## Our commitments

Halma and its companies do not accept or provide gifts, entertainment or hospitality if the intent is to influence a decision or to gain a business advantage, or confidential information.

Gifts and hospitality are a positive way of building a business relationship. What we need to avoid is any perception that they are being used as a means of influencing or rewarding the recipient, whether that's you offering or receiving them.

## Your role and responsibilities

- Never ask for any gift, hospitality, favour or preferential treatment;
- Never offer, give or receive gifts, entertainment or hospitality that could be seen as a way to influence a decision;
- Never give or receive any gifts, entertainment or hospitality during a tender or contractual negotiation;
- Never give or receive a gift in cash or other monetary forms;
- Never give a gift, benefit or entertainment of any kind to a government official;
- Comply with [Halma's Anti-Bribery and Corruption Policy](#); and
- Ensure all gifts, entertainment and hospitality are properly authorised and recorded in the [Gifts, Entertainment, Hospitality and Charitable Donations Register](#).

## Key questions

Before giving and/or receiving any gift or hospitality, ask yourself these four questions:

- Will it be seen as influencing the recipient's business decision?
- Does the value or nature make me feel uncomfortable offering or accepting it?
- Is it prohibited by Halma's Anti-Bribery and Corruption Policy and Code of Conduct?
- Is it prohibited by local laws or the recipient's Code of Conduct?

If the answer to any of these questions is **yes**, you must not give and/or receive the gift and/or hospitality.



# Political and charitable activity and donations

## Our commitments

As a group of life-saving technology companies, we are driven by a deep respect for human rights and doing all that we can to grow a safer, cleaner, healthier future for everyone, every day. We are therefore supportive of our companies making charitable donations subject to set criteria.

Halma is a non-political organisation, and we do not support or align with any particular political party. Our companies are therefore not permitted to make political payments of any kind. Our companies may however, in accordance with applicable law, openly convey the Group's views and concerns to policy makers on relevant issues through the use of bona fide independent lobbying firms who have received the Group CEO approval.

## Your role and responsibilities

- Ensure that any charitable donation is made in compliance with the Halma Anti-Bribery & Corruption Policy;
- Never make any form of political payment by or on behalf of a Halma company or utilise any of your company's assets to do so;
- Never pressure anyone you work with to contribute to or support particular political activities; and
- Before engaging in any lobbying activities ensure that the lobbying organisation meets the criteria set out in the [Halma Anti-Bribery and Corruption Policy](#).

### Can I make a company charitable donation?

If you have any doubts about whether it is appropriate to make a charitable donation, ask yourself these six questions:

- Am I satisfied that it is a legitimate charity?
- Does the purpose of the charity benefit a wide section of the population rather than a few specific individuals?
- Is the charity independent of any business relationship?
- Is the donation allowed by local legislation?
- Is the donation value within the recommended financial threshold set out in the Halma Anti-Bribery and Corruption Policy?
- Do I have the necessary pre-approvals?

If the answer to any of these questions is **no**, then you should not offer the donation.

### What is a political payment?

A contribution, in cash or in kind, aimed at supporting a political cause. It could for example include loans, a payment to a charity that funnels funds to a particular political party, expensing the cost of a ticket to a fundraising event for a particular political party or providing services at a discounted rate to political parties or individuals.

# Conflicts of interest

## Our commitments

At Halma we are focused on fulfilling the Group's purpose and always promote the best interests of the Group and our stakeholders.

To ensure that all business decisions are made in the best interest of our business, we expect our people to avoid a conflict with all personal interests that could affect our ability to make fair, objective business decisions.

Trust is integral to all our business relationships.

## Your role and responsibilities

- Know and try to avoid a conflict of interest when you see one;
- If a conflict of interest is absolutely unavoidable ensure it is disclosed and managed in line with the [Halma Conflicts of Interest Policy](#);
- Maintain the highest possible standard of integrity in all your business relationships, both inside and outside the organisation in which you work;
- Never use your authority or position for personal gain; and
- Avoid being, or giving the appearance of being, in a position which may result in an actual or perceived detriment to any Halma company's reputation and/or interests.

### Examples of possible conflict of interest situations:

- Recruiting, managing or appraising a close friend or family member.
- Undertaking an additional role, outside of Halma, which is for a competitor.
- Taking part in any decision-making process involving any Halma company and another business that employs a friend or close family member. For example, a tender for a key supply contract.

## Key questions

What if I am unsure as to whether a personal interest conflicts with Halma's interest? Ask yourself these key questions:

- Can this situation put me in a position of potential personal benefit?
- Can this personal relationship/situation be perceived as influencing my business decision?
- Could it result in my family or friends receiving an unfair benefit?
- Do I have to choose between Halma and something or someone else when making this decision?
- Would disclosing the relationship to my work colleagues cause me embarrassment?

If the answer to any of the above is **yes** you should discuss the position with your line manager in the first instance.

# International trade laws

## Our commitments

As a global business, we believe in fully complying with international trade laws (including anti-money laundering laws, economic sanctions, import and export laws and controls and anti-boycott laws) in all jurisdictions where we operate. We may also take account of global trade laws even if these are not directly applicable to us where it is the right thing for us to do.

Halma and its companies are committed to implementing appropriate controls, policies and procedures to help support the lawful export of all goods, services, information and technologies.

## Your role and responsibilities

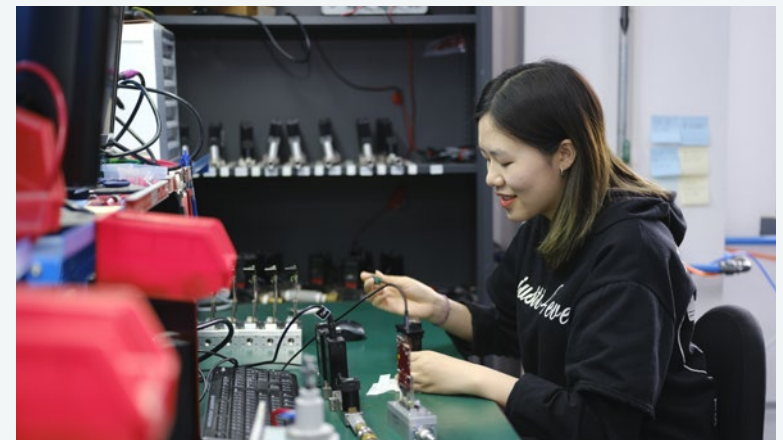
- Know and comply with all applicable trade laws;
- Know which countries Halma and its companies are allowed to operate in/with;
- Know what you are importing or exporting and ensure you have all the necessary licences and approvals;
- Only make and receive payments for goods and services via approved payment methods. Report any red flags (such as unusual third party requests). If in doubt, consult the [Halma Anti-Money Laundering and Counter Terrorism Policy](#);
- Comply, at all times, with the [Halma Trade Compliance Protocol](#) and any company internal trade compliance policies and procedures; and
- Reach out to the Halma Director of Risk and Compliance if you have any queries in relation to international trade law.

## Key questions

Ask yourself these four key questions:

- **What?** Determine whether the item(s) involved in the transaction require an export license.
- **Where?** Check the Halma Trade Compliance Protocol to confirm if sales and exports to the relevant country are permitted.
- **Who?** Ensure you have carried out 3rd party due diligence, including sanction screening, before entering into the relevant arrangement.
- **Why?** Assess if the product can be used for military purposes or involve military end-use concerns. If this might be the case, pause your transaction and escalate to the Halma Director of Risk & Compliance.

Refer to the [Sanctions and Export Control Decision Tree](#) for further guidance.



# Competing fairly

## Our commitments

Halma and its companies believe in fair competition and are committed to complying fully with all applicable competition laws.

Halma and its companies are committed to maintaining adequate controls to help ensure that its personnel remain compliant with competition laws at all times.

## Your role and responsibilities

- Know who is an actual or potential competitor;
- Do not discuss or agree to any kind of arrangement with competitors to fix prices, rig bids, allocate customers or markets, limit supply or otherwise restrain trade or prevent others from competing;
- Do not exchange any commercially sensitive information, particularly pricing information, with competitors;
- Leave any meeting or discussion where you believe anti-competitive discussions are taking place and inform your Managing Director;
- If a competition authority arrives at your company premises call one of the lawyers on the Dawn Raid List for your country; and
- Comply with the [Halma Competition Policy](#).

### What is commercially sensitive information?

Information in respect of prices, sales volumes, customers, territories, ongoing bids, terms and conditions of sale, product development or design, costs or project margins or any other price sensitive information. This information should not be shared with anyone you would consider a competitor.

**What if a sales representative of one of Halma's competitors approaches you with the following offer: "If you leave customer X to us, then we will leave customer Y to you."**

You should say **no** to this, as this offer constitutes an illegal attempt at market sharing. You should also report the conversation to your Managing Director.

**What if you are at a trade association meeting, and one of your competitors starts to discuss potential price increases relating to the introduction of new product regulations?**

Discussions relating to such a topic would be considered unlawful as they constitute commercially sensitive information. You should refuse to discuss the matter, leave the conversation and report what happened to your Managing Director.

# Working with our business partners

## Our commitments

We are careful about who we work with. We only want to work with business partners that share our commitment to ethics and integrity. We complete due diligence checks on all third parties to try and ensure we know who they are and have assessed key risk factors.

We expect all our business partners to share similar values to Halma, and to act consistently with the Halma Code of Conduct. As set out in the Halma Supplier Code of Conduct which is being introduced on a phased basis, we expect our suppliers to reduce negative environmental and social impacts where relevant and to ensure lawful, fair and ethical business practices. We value the relationships our companies have with their business partners and treat them the way we expect to be treated.

## Your role and responsibilities

- Carry out appropriate due diligence on all third parties before entering into any form of arrangement with them;
- Clearly communicate Halma's expectations to business partners;
- Speak up if you notice or suspect that a business partner is not complying with the Halma Code of Conduct, and the Halma Supplier Code of Conduct, where relevant, all applicable laws or their contractual obligations;
- Anyone may report a suspected violation of Halma's Supplier Code of Conduct confidentially via [Halma's Whistleblowing Hotline](#);
- Treat all your business partners fairly and with respect; and
- Consult the [Halma Third Party Due Diligence Guidance](#) document when undertaking third party due diligence.

### Who are our business partners?

Our business partners are anyone we engage in business with, including suppliers, vendors, contractors, consultants, representatives, agents, intermediaries, distributors and customers.

### Key aspects to assess during the third-party due diligence process:

- **Identification verification** – is the party who it says it is?
- **Location** – is the party in a high risk country from a sanctions, corruption, money laundering, terrorist financing and tax evasion perspective?
- **Transaction structure** – is the party operating in a high risk sector e.g. military and arms or money transfer and exchange? Is the party selling through a third party intermediary such as a distributor or reseller?
- **Sanction** – is the party itself sanctioned or connected to a party that is?
- **Government exposure** – is the party a Politically Exposed Person or State-Owned Enterprise?
- **Reputation** – does the party have a good reputation? Has it been engaged in criminality previously?
- **Behaviour** – is the party showing behavioural red flags?
- **IT/Cyber security** – does the party have controls to mitigate the risk of a data breach?
- **Environmental and social** – does the party strive to reduce negative environmental and social impact where relevant?

# Integrity towards people and the planet

"Our purpose is  
to grow a safer,  
cleaner, healthier  
future for everyone,  
every day."



# Environment and sustainability

## Our commitments

Halma's purpose of growing a safer, cleaner, healthier future for everyone, every day is central to who we are as a business and the foundation of our approach to sustainability. It drives us to grow our positive impact by protecting the planet with our companies' technologies and improving people's lives, while we continue our work to minimise our environmental footprint.

Our companies are committed to our sustainability goals and have developed their own sustainability plans and targets to help us deliver on those goals. We encourage our companies to improve efficiency, reduce waste and emissions, build responsible, resilient and sustainable supply chains, and strive to go beyond mandatory environmental and regulatory requirements.

## Your role and responsibilities

- Be aware of Halma's and your company's sustainability goals and play your part in helping Halma and your company to reach them;
- Meet and, where appropriate, go beyond mandatory environmental legal and regulatory requirements;
- Strive to operate in ways that minimise the impact on the environment, protecting and reducing the use of natural resources in operations and supply chains; and
- **Report** any actual or suspected breach of applicable environmental policies and any environmental incident.

### What is Halma's approach to sustainability?

Our growth strategy has sustainability at its core. Driven by our purpose and organisational model, we acquire and grow businesses which have sustainability opportunities – to deliver positive impact by supporting people and protecting the planet through our companies' technologies.

We encourage our companies to innovate to address sustainability-related growth opportunities, designing solutions to solve their customers' sustainability challenges and where possible, using digital as a lever of growth.

Our companies are also working to operate and innovate in a more sustainable manner by focusing on sustainable design and waste reduction, reducing emissions, and creating inclusive and diverse workplaces.

You can find out more about our approach to sustainability on our website at [www.halma.com/sustainability](http://www.halma.com/sustainability) or on [Halma Home](#).



# Health and safety

## Our commitments

The health and safety of our people and the people we work with are our first priority.

Halma and its companies are committed to providing a safe and secure working environment and upholding the highest health and safety standards.

Our companies also contribute to enhancing health and safety through their products, in line with Halma's purpose of growing a safer, cleaner, healthier future for everyone, every day.

## Your role and responsibilities

- Comply with all applicable health, safety and security policies and laws relevant to your role and your company;
- Complete any health and safety training required for your role;
- Help maintain a safe workplace - stop your work or that of another if you believe it is unsafe;
- Make sure your performance is not in any way impaired, including by alcohol, drugs (including prescription or over-the-counter medication) or lack of sleep;
- Communicate any applicable health and safety standards to business partners; and
- Promptly report any accident, injury or unhealthy condition or any threats, intimidation or acts of violence in line with the [Group Health and Safety Policy](#) and relevant company policies and procedures.

**How should our companies ensure the highest standards of Health & Safety in their working environment? They should:**

- Carry out regular health and safety risk assessments;
- Have appropriate policies and procedures in compliance with applicable health and safety laws and regulations;
- Provide welfare facilities and a working environment that is healthy and safe for everyone in the workplace;
- Provide appropriate health and safety training and instruction;
- Carry out regular audits of the company safety management system; and
- Implement a suitable process to ensure that all unsafe conditions, near misses and accidents are reported.

It is everyone's individual responsibility to ensure that they are fully aware of and compliant with both their company health and safety policy and the [Group Health and Safety Policy](#).



# Human rights and modern slavery

## Our commitments

We respect the human rights of everyone (regardless of their nationality, sex, ethnic origin, religion or any characteristic or circumstance) and are committed to complying with all applicable laws pertaining to human rights and modern slavery. We 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: The effective abolition of child labour; The elimination of all forms of forced or compulsory labour; Freedom of association and the effective recognition of the right to collective bargaining; The elimination of discrimination in respect of employment and occupation; and a safe and healthy working environment.

We are committed to implementing and strengthening 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.

## Your role and responsibilities

- Complete all modern slavery and human rights training required for your role;
- Comply with all applicable human rights and modern slavery laws relevant to your role;
- Treat everyone with respect and fairness and ensure that your actions do not impair the human rights of others;
- **Report** any suspected human rights violations in our operations or in the operations of our business partners in line with [Halma's Modern Slavery Policy](#) and [Halma's Human Rights and Labour Conditions Policy](#);
- Include specific anti-slavery clauses in sale and distribution terms and conditions;
- Carry out appropriate human rights and modern slavery due diligence on any third party that you are considering engaging with; and
- Comply with [Halma's Modern Slavery Policy](#), [Conflict Minerals Policy](#) and [Halma's Human Rights and Labour Conditions Policy](#).

### What are the warning signs and risk factors for potential human rights violations and modern slavery?

- **Age** – workers who appear very young.
- **Behaviour** – workers who exhibit signs of anxiety or fear.
- **Health** – workers who show signs of poor health or regime.
- **Industries** – certain industries are more exposed to modern slavery and human rights violations including electronics and mining.
- **Location** – there is a higher risk of modern slavery and human rights violations in certain countries (see [www.globalslaveryindex.org](http://www.globalslaveryindex.org) for further details).
- **Living conditions** – workers who live together on site or in accommodation provided by the employer, often under poor living conditions.
- **Overtime** – workers who appear to be extremely fatigued and working unreasonable hours with little to no breaks.
- **Payment** – workers who are paid in cash rather than through a documented system detailing rates, hours worked etc.
- **Restricted movement and security** – workplaces with unusual security such as bars on the window or barbed wire fencing and/or workers who have had their identity documents taken away and so are powerless to leave.
- **Subcontracting** – workers who are subcontracted throughout the supply chain might be at higher exposure to poor regulation and worker exploitation.

# Diversity, equity and inclusion

## Our commitments

We are committed to building diverse, equitable and inclusive businesses. We believe that everyone should be treated with fairness, respect and dignity and have the right to feel welcome at work and supported to bring their full and authentic self with no fear or consequences.

Inclusion at Halma is an enabler to connect diverse perspectives and unleash the power of our people, our partners and our businesses. We do not tolerate any form of unfair discrimination or harassment for any reason, including on the basis of race, ethnicity, disability, gender, religion, age or sexual orientation or any other characteristic protected by applicable law.

Halma has implemented a diversity, equity and inclusion strategy framework to enable all at Halma to accelerate their efforts and continue to foster a diverse and inclusive mindset. Our companies work within this framework to ensure equal opportunities for all regardless of characteristics or circumstances. We are committed to complying with all applicable employment, labour and immigration laws and expect our business partners to do the same.

## Your role and responsibilities

- Treat everyone with respect and fairness and help create an inclusive and diverse workplace which is free from discrimination and harassment;
- Respect cultural differences, seek insights from different perspectives and leverage diverse points of view;
- Comply with all applicable employment, labour and immigration laws and [Halma's Diversity and Inclusion Policy](#);
- Play your part and be an ally; and
- Promptly report any bullying, discriminatory or inappropriate behaviour to your line manager or Talent Partner.

### **What if I witnessed one of my colleagues being bullied by their line manager? Should I say something?**

**Yes.** It is important to report any concerns regarding bullying to your Talent Partner. If you feel comfortable, you should also speak to your colleague to check that they are okay.

### **What if one of my team members emailed me an inappropriate joke which made me feel uncomfortable? Should I say something?**

**Yes.** It is important to report any inappropriate behaviour to your manager or Talent Partner and, if you feel comfortable, let your team member know how you felt about this email.

### **What can I do to make a difference?**

- We're all biased - because we're all human. But there's an important difference between unconscious bias, which is biologically wired into us, and conscious prejudice, where we deliberately discriminate against others. Learn more about how to uncover your biases.
- The way our bias leaks out is through everyday micro messages which can be more harmful than overt prejudice, so it's our responsibility to spot it and stop it. Find out steps to address it.
- Inclusion can be built by the small interactions we have with our colleagues, day in and day out. Learn some ways you can do that.

At Halma, we celebrate the contributions of our diverse community and showcase how we're building inclusive businesses year-round. Have a look at all the ways we are gaining from the cultural and performance benefits of diversity.

# Data ethics

## Our commitments

We respect the privacy of individuals and understand that holding personal data (or personally identifiable information) is a privilege and responsibility.

Halma and its companies are committed to collecting personal information only when necessary and using it both in an ethical manner and in compliance with all applicable data privacy laws. When developing digital technologies, we take necessary steps to ensure that data is always handled ethically.

## Your role and responsibilities

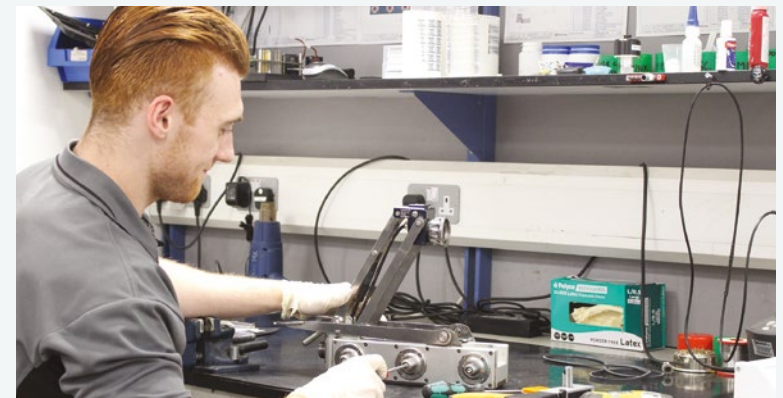
- Only collect and use personal data for lawful and ethical purposes and be transparent about its use;
- Keep all data in your possession safe and secure – do not share it with anyone without a legitimate reason;
- Delete the data whenever it is no longer required, in line with applicable data retention guidelines;
- Report any data breaches as soon as possible to your line manager and any other named contacts in the [Halma Data Protection Policy](#) and at least within 24 hours of discovery; and
- Comply with all applicable Data Privacy regulations and the [Halma Data Protection Policy](#).

### What is personal information?

Personal data means any information which relates to an identifiable living individual. This includes a person's name, contact information, bank account information, card details, salary and more. A piece of information that alone does not identify an individual (such as marital status) could still be personal data if it can be coupled with other information about that person that could identify them. It is safest to assume that all information relating to individuals is personal data.

### What constitutes a data breach?

A data breach is when personal data is stolen, lost and/or accessed by unauthorised individuals. It is important to remember that data breaches are not just caused by hacking. An email sending out personal data to the wrong person, leaving a cabinet in the office with personal data inside unlocked or leaving a laptop on a train could lead to a data breach.



# Product quality and safety

## Our commitments

Our companies take pride in the quality of their work and are committed to the highest levels of quality and safety standards at every stage of the product life cycle. Our companies are a group of life-saving technology companies where quality and safety are core to both their operation and purpose. All at Halma understand the need for customers to be able to rely on the safety and quality of their products.

Our companies are committed to implementing appropriate quality and safety management systems to comply with quality control standards and health and safety laws and regulations relevant to their operation. We also encourage our companies to obtain relevant ISO certifications where appropriate.

## Your role and responsibilities

- Do not compromise on quality and safety standards and keep quality as a core objective of every stage of the product life cycle;
- Comply with all applicable internal and external product quality control standards and health and safety laws and regulations, and internal processes and procedures;
- Review and monitor the systems and procedures in place to ensure that they maximise product quality and safety; and
- Promptly report any quality or safety concerns in line with your company procedures and with Halma's policies.

### How is product quality and product safety managed at Halma?

Our companies manufacture and assemble a wide variety of product types across different geographies and end markets. They are therefore experts in their trade and carry the responsibility for complying with relevant product safety and quality requirements, obtaining relevant accreditations and all necessary product certifications.

### **Halma's companies have adopted customised sets of controls to achieve high-quality standards – these might include but are not limited to:**

- Product development and testing procedures.
- Clear requirements for suppliers to ensure safety and quality.
- Quality checks on products received from suppliers.
- Monitoring of defects and warranty returns.
- Traceability of product.
- Product compliance with regulations is checked as part of due diligence for any new acquisition.
- Ensuring employees have appropriate quality-related skills.

# Financial integrity

"We play to win, but not at the expense of others."



# Protecting our assets

## Our commitments

We understand the importance of our assets to our business – they are part of our unique infrastructure and help our companies to grow. We strive to protect our assets and to safeguard them from any form of damage, misuse, fraud or loss. We have a zero-tolerance approach to fraud.

Our assets are both tangible and intangible. They include physical property, technological equipment, office supplies, financial information, intellectual property, patents, confidential information, trade secrets, documents, information systems, product designs and drawings and any form of data.

Halma and its companies are committed to maintaining appropriate controls, policies and procedures to secure their assets and treat third party assets in their possession with similar standards of care.

## Your role and responsibilities

- Act appropriately to protect and maintain company assets, including being vigilant against theft, cyber-attacks and scams such as phishing emails;
- Only use software and applications which have been authorised by your company;
- Do not share Halma or third-party information externally unless it is already in the public domain;
- Never engage nor facilitate any fraudulent activity;
- Contribute to maintaining adequate controls to prevent and detect fraud;
- Comply with the [Halma Cyber Security](#) and [Halma Fraud](#) policies, including the obligation to prevent fraud;
- Comply with all applicable Halma IT policies where using Halma IT equipment and devices (including the [Acceptable Use policy](#)); and
- Report any instances of damage, misuse, fraud or loss in line with these policies.

**What if a colleague called me whilst I was travelling on the train to discuss a new confidential project. Am I okay to take the call?**

You should never discuss company confidential information in public places such as trains, restaurants and hotel lobbies where someone might overhear you. If you answer the call you should suggest calling your colleague back when you are able to speak without fear of anyone listening.

**What if I am speaking at a conference for aspiring product designers. Am I able to talk through the proprietary intellectual property behind one of the company's key products?**

**No.** Company intellectual property can be the result of significant work and investment and should only be shared with those who need to know it. Publicly sharing intellectual property could undermine the validity of patents which have been put in place to protect the product.



# Records and transactions

## Our commitments

We are committed to ensuring that all our records and reports (in whatever form) are accurate and understandable. There is never any justification for mis-recording or mis-reporting. We are committed to providing our stakeholders and the public with accurate and transparent disclosures.

We commit not to engage in any unlawful transactions, including those that facilitate tax evasion or utilise property derived from illegal conduct or that support crime or terrorism. Halma and our companies have policies, procedures and controls in place to ensure accurate, complete and transparent reporting and compliance with applicable money laundering, counter terrorism and tax evasion laws and regulations.

## Your role and responsibilities

- Record and report all information accurately and correctly;
- Do not disguise or omit material information;
- Be aware of risk factors in relation to money laundering, fraud, terrorism and tax evasion;
- Ensure strong internal controls over financial reporting and adequate fraud prevention procedures are in place;
- Maintain supporting documentation for all transactions; and
- Immediately report any irregularities or concerns in line with [Halma's Fraud Policy](#), [Halma's Anti-Money Laundering and Counter Terrorism Policy](#), and [Halma's Anti-Facilitation of Tax Evasion Policy](#).

**What if my line manager asks me to make some adjustments to the financial reporting to show more sales?**

This would constitute mis-recording company records and could be illegal. You should say **no** and report the matter in line with the [Halma Whistleblowing Policy](#).

**What if I discover that a colleague has been manipulating the health and safety data for our company? The data does not include figures in relation to accidents resulting in time off work.**

Health and safety data is material non-financial information which should be accurately recorded. You should report the matter in line with the [Halma Whistleblowing Policy](#).

**What if I am not sure about the accounting treatment of a transaction?**

You should seek further guidance from your line manager or seek internal expert advice to prevent mis-recording or mis-reporting.

**What if a customer pays a large sum to my company and then requests it back for no valid reason? Should I transfer the money back?**

Making a payment and then requesting it back for no valid reason could be a sign of intended money laundering. Speak to your line manager before making any payments.

# Insider dealing

## Our commitments

We believe that all trade should be conducted fairly and ethically. Inside information should not be used by employees or companies to gain an unfair advantage by dealing in shares affected by it or by sharing insider information with others.

Halma and its companies are committed to complying with all applicable laws and regulations regarding the control of inside information and restrictions on dealing in shares on the basis of such information.

## Your role and responsibilities

- Know what constitutes inside information;
- Do not deal in shares based on inside information (including not only Halma's shares but also the shares of any public company);
- Do not share inside information with family members, friends or anyone inside or outside of Halma unless you have prior written approval;
- Never engage in any activities intended to manipulate the price of listed securities, including spreading false information; and
- If you are a PDMR or Restricted Person (see definition in the right hand side box) ensure that you comply with the [Halma Share Dealing Code](#). If you are unsure as to whether you are a PDMR or Restricted Person please check with your line manager or see the [Halma Share Dealing Code](#) for guidance.

### What constitutes inside information?

Information which relates to a company or company securities, which is not publicly available, which is likely to have a material effect on the price of company securities and which an investor would be likely to use as part of the basis of his or her investment decision.

Examples include information as to: proposed mergers or acquisitions, new products or services, projections of future earnings or losses, changes to the executive leadership team and potential or existing legal proceedings.

### What is a PDMR or Restricted Person?

A PDMR is a person discharging managerial responsibilities such as a director of Halma plc, a member of Halma plc's Executive Board, or any other person who has been told that they are a PDMR.

A Restricted Person is a person who is a PDMR or anyone that falls within the following categories: (i) is a personal or executive assistant of a PDMR; (ii) has access to Halma plc's financial results or who works on the annual/half year report; (iii) is a Halma plc function or department head; or (iv) is a Divisional Chief Executive or other sector board member.

### What if I leave my role at Halma, am I allowed to share information about a potential M&A target I was working on before leaving?

**No**, the rules regarding sharing inside information continue to apply even when you are no longer a Halma employee.



## Halma Code of Conduct

I acknowledge that I have received and read a copy of the Halma Code of Conduct (2025).

I understand the importance of the Code as a way of communicating Halma's commitment to ethical business activity and agree to comply with the Code's requirements at all times.

**Name**

.....

**Company**

.....

**Position**

.....

**Signed**

.....

**Date**

.....



# Halma

Misbourne Court  
Rectory Way  
Amersham  
Bucks HP7 0DE

Tel +44 (0)1494 721111  
Web [www.halma.com](http://www.halma.com)