### Code of Ethics

## Integrity in Action

Our Code of Business Ethics is Who We Are, Every Day.

#### **Preface**

This code of ethics forms the core shared principles for all Gardex employees for the protection of the company's image and credibility and to ensure responsible behavior.

The formulation of a shared code of ethics thus aims to encourage and guarantee responsible behaviors on the part of management and employees, as well as to protect Gardex and its employees against improper behavior that is not consistent with the values of the company.

It is important to formulate clearly the principles, values and responsibilities that guide Gardex's behavior on the market, in relation to the communities in which it is commercially active, and in relation to people and all others affected.

Gardex's employees are urged to observe the laws and regulations that apply in countries where Gardex is active and to adopt the ethical principles laid down here as their own.

The code of ethics is the tangible symbol of responsibility that Gardex accepts in relation to its employees and all those affected. Gardex's behavior complies with the statutory requirements, professional ethos and its internal guidelines. The pursuit of Gardex's interests does not justify any dishonest behavior or behavior that contravenes the principles set out.

#### **Ethical Principles**

**Putting people first**: In placing trust in our people, Gardex sees the expression and foundation of its culture and identity. Gardex encourages human diversity in all its forms.

**Comply with laws**: We comply with all laws, whether local, regional or national – and ensure all stakeholders do the same.

**Eyeing positive impact**: We are constantly thinking on how we can run more efficiently by reducing energy and water consumption, waste generation and carbon emissions.

**Integrity is key**: Our team is honest, transparent and truthful – unwilling to sacrifice principle for expediency and wrongdoing, and committed to transparency in communications.

**Concern for all**: Awareness for the individual and the protection of a person's physical and moral integrity are the core values that guide Gardex's approach.

#### **Quality Policy**

#### The company's choices are based on the following:

- Maximum quality of commercial striking and hand tools, steel files and horseshoe nails.
- Customer Satisfaction
- Continuous improvement, innovation and growth
- Pursuit of company's mission in responsible manner and in line with sustainable development.

#### Consequently, the management endeavors to:

- Introduce and implement a quality culture with clear and specific support.
- Encourage the customer to be proactive so that products can be developed in accordance.
- Promote research and development and encourage innovation of products and processes.
- Ensure the safety of the product's end users, by assuring strict controls on the entire manufacturing chain starting from the raw materials upto the distribution of finished goods.
- Correct any deviations according to standards and implement preventive measures to avoid their recurrence.
- Seek to optimize processes and maximize efficacy-efficiency while protecting the environment.
- Advocate competence and knowledge of staff, by appropriate training.
- Encourage internal communication at all levels of the company.
- Promote continuous improvement of the working environment and staff well-being.
- Share and spread at all company levels its own code of ethics.

#### **Our Partners**

At Gardex, we expect high standards of performance and integrity from our partners. All operation and mutual relationships are based on quality, competitive prices, sustainability and integrity.

The company, therefore, based on these principles, aims to establish long-lasting relationships with mutual benefits of its partners. It is the responsibility of each partner to be aligned and consistent with the laws, regulations and codes on industrial application. In the choice of suppliers, we are looking for innovative resources that contribute to the dynamic growth of the company. Therefore, we identify suppliers who share the commitment to sustainability by developing long-term relationships with the aim of improving mutual business, as well as the world around them.

# gardex