



## Air Distribution Technologies, Inc. Code of Conduct

### 1. Letter from the CEO introducing the Code

Dear Team

Each one of us is a custodian of our company culture. Through our daily practices, we strive to build a culture of integrity that drives trust and fosters learning.

These practices reflect our commitment to our colleagues, customers, business partners, shareholders, and the larger society. Building a reputation as a trustworthy and ethical organization among our stakeholders is necessary to maintain a positive brand perception and drive positive customer experience and financial performance.

To achieve this, we must have a high-caliber workforce continuously maintaining the highest standards. The Air Distribution Technologies Code of Conduct is designed to support this goal and guide each of us in the practices that ensure our performance meets the highest ethical standards and recognize industry's best practices. It is our responsibility to understand and act upon the Code of Conduct as we conduct business day to day, adhering to all applicable industry standards and best practices.

If you are ever unsure of what to do, your managers and leaders will be happy to help you resolve doubts and ethical dilemmas. Thank you for contributing to the legacy of integrity we enjoy at Air Distribution Technologies.

Sincerely,

Doug Schuster  
President

## 2. Purpose

Air Distribution Technologies is built upon a foundation of strong corporate values and business practices. Our standards of business conduct serve as an important resource for us in support of day-to-day decision making. Our standards represent the core of how we create the solid foundation of trust and success that is reflected in our relationships with customers, suppliers, shareowners and each other. Our reputation comes from the sum of our individual actions. Misconduct by just one of us can overshadow hard work by thousands of us. Our Code of Business Conduct and Ethics is designed to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- A culture where we value our differences, treat one another with respect and encourage the sharing of ideas and opinions
- Full, fair, accurate, timely, and understandable disclosure in reports and documents we file with regulatory agencies and in our other public communications
- Compliance with applicable laws, rules, and regulations
- The prompt internal reporting of violations of this Code
- Accountability for adherence to this Code

This Code should help guide our conduct in the course of our business. Many of the principles described in this Code are, however, general in nature, and the Code does not cover every situation that may arise. Use common sense and good judgment in applying this Code. Of course, none of us has all the answers, and that's fine — provided we reach out to find the best answers available. This Code is not the exclusive source of guidance and information regarding the conduct of our business. We should consult applicable policies and procedures in specific areas as they apply.

## 3. Scope

This Code applies to everyone in the Company including our leadership and all officers and employees of the company and its subsidiaries when doing work for Air Distribution Technologies. The same high ethical standards apply to all, regardless of job or level in the company. This Code applies to contractors and temporary colleagues when they are performing work on behalf of Air Distribution Technologies or representing the company. It is the responsibility of each of us to be familiar with all policies and procedures relevant to our job functions.

## 4. Guidelines for Ethical Decision Making

We are responsible for recognizing ethical issues and doing the right thing in all Air Distribution Technologies business activities. But not all circumstances we encounter are straightforward. We must consider the following when faced with a difficult decision or situation:

- What feels right or wrong about the planned action?
- Is the planned action consistent with the Code and Company policies?
- Would I be comfortable if my actions were reported in the news or to my supervisor?
- How will the planned action appear to my manager, Company executives, or the general public?
- Could I justify my actions to my co-workers, friends and family?
- Would another person's input help to evaluate the planned action?

## 5. Employee Responsibilities

As a part of Air Distribution Technologies, we are expected to comply with both the letter and the spirit of our Code. This means we must understand and comply with all of the policies, laws and regulations that apply to our job, even if we feel pressured to do otherwise. The best way to ensure we are upholding our values and code of conduct is for each of us to take this as a personal responsibility.

Our Code also requires us to seek guidance if we have questions or concerns and to cooperate fully in any investigation of suspected violations of the Code that may arise in the course of our employment.

At least on an annual basis, we are required to provide a written certification that we have reviewed and understand Air Distribution Technologies Code of Conduct, comply with its standards, and are not personally aware of any violations of the Code by others. This certification is our pledge to live up to our Code and its expectations and to promptly raise concerns about any situation that we think may violate our Code. Additionally, all employees are required to undergo regular compliance training to ensure ongoing understanding and adherence to the Code of Conduct and related policies.

Employees who violate our Code put themselves, fellow employees, and Air Distribution Technologies at risk and are subject to disciplinary action up to and including termination of employment.

## 6. Compliance with Relevant Laws and Regulations

Air Distribution Technologies operations and employees are subject to the laws of the countries and jurisdictions in which we operate. It is important that we are aware of, and never intentionally violate, relevant laws and regulations.

Violating relevant laws, regulations, or this Code, or encouraging others to do so, exposes Air Distribution Technologies to risk, including risk to its reputation, and therefore may result in disciplinary action up to and including termination of employment. We should understand that violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, civil and criminal penalties that could affect us personally in addition to a risk of adverse consequences to Air Distribution Technologies. We should also be alert to changes in the law or new requirements that may affect our business unit.

## 7. Speaking Up & Reporting Channels – Introduction

At Air Distribution Technologies, we aim to conduct business with the highest standards of ethics, honesty and integrity. Each of us is responsible for preventing the violation of this Code and reporting concerns about any form of malpractice, improper action or wrongdoing by Air Distribution Technologies, its employees or other stakeholders.

Air Distribution Technologies believes that any employee with knowledge of wrongdoing should not remain silent. Even when we don't have all the details related to our concern, we are encouraged to report it with the reassurance that Air Distribution Technologies will treat it seriously, fairly and promptly.

While Air Distribution Technologies works hard to identify, incentivize and reward those who do the right thing, it also takes the necessary action, including notifying relevant violations to the authorities and invoking employment consequences against those who reject our values, allow violations of this Code of Conduct or engage in other unacceptable conduct. Where violations occur, then improvements shall be openly discussed and implemented, rather than buried or hidden.

## 8. Obligation to Report

We are obligated to report violations of the Code, the law, or any other company policy or procedure. If we have questions, concerns, or need to report a known or suspected violation, we must discuss it with our supervisor, any member of our management team, a Human Resources representative, our Legal and Compliance department or contact the Ethics Helpline where we can report our concern confidentially or anonymously. We

understand that we may be subject to discipline, up to and including termination, for our failure to do so.

## 9. Contact Information for Reporting Channels

If we think that an actual or possible violation has occurred, it's important to report our concerns immediately to our supervisor, the HR department or our Legal & Compliance department. We are encouraged to identify ourselves when reporting a possible violation and the Company will make every effort to protect our identity if we do so.

We may, however, report a suspected violation anonymously by connecting with the Ethics Help Line at

- Web intake form – <https://airdistribution.ethicspoint.com>
- Mobile intake form – <https://airdistributionmobile.ethicspoint.com>
- Hotline – phone numbers available on the web intake site

or by connecting with our Legal & Compliance Department, unless we are calling from one of the few countries where local laws restrict such practices. If we are not sure about anonymity restrictions in our location, we must ask the Helpline.

Air Distribution Technologies does NOT tolerate retaliation against ANY employee who reports or assists in the resolution of an investigation. If we believe we're experiencing retaliation, we must contact the Ethics Helpline immediately.

## 10. Investigating Misconduct Reports

Our Legal & Compliance Department has established processes and procedures to ensure that all internal investigations are conducted by qualified personnel who have been trained to conduct investigations lawfully, promptly, thoroughly, professionally, fairly and confidentially. Upon receiving a report, they:

- Engage only the necessary partners to evaluate the reported concern.
- Keep all information strictly confidential to the best extent that they can.
- Treat everyone involved in the internal investigations with dignity and respect.
- Provide regular updates to the reporter to the best extent that they can.
- Take prompt and appropriate action if the report is substantiated and notify those involved in the investigation.

- Conduct all investigations and any resulting corrective action in compliance with local law, applicable Air Distribution Technologies policies and any required workers' representative consultation requirements.

In addition, Air Distribution Technologies may, in appropriate cases and subject to applicable local laws, notify government authorities and cooperate with any resulting prosecution or other government action. In addition, when legally required or otherwise appropriate, Air Distribution Technologies will timely self-report compliance violations to applicable government authorities and cooperate with any resulting official proceedings. The determination of whether and when to refer a matter to government authorities, or to self-report compliance violations, will be made by the Legal & Compliance lead or their designees.

## 11. Employee Role

If we are involved in an investigation, we are expected to cooperate fully and candidly in the following ways:

- Report suspicious behavior instead of engaging in our own fact-finding and interfering in the investigation.
- Cooperate in internal investigations, audits, accounting reviews or directions from Air Distribution Technologies' lawyers in connection with lawsuits or government investigative proceedings.
- Provide any and all requested documents or records as soon as possible. Searches of company-provided physical and information technology resources may be required.
- Refrain from destroying or altering the requested documents or records in any way.
- Comply with all specified protocols for confidentiality and secure sharing of data during remote investigations.
- Report any employees or managers who display retaliatory behaviors against us or others.

## 12. Anonymity & Confidentiality

When we make a report to the Legal & Compliance Department or through the Ethics Hotline, we may choose to remain anonymous, although we are encouraged to identify ourselves to facilitate communication. If we make our identity known, the Legal & Compliance Department and investigators will take every reasonable precaution to keep our identity confidential and consistent with conducting a thorough and fair investigation. To help maintain confidentiality, we must avoid discussing these issues or any investigation with other employees. Because Air Distribution Technologies strives to

maintain strict confidentiality in all investigations, we may not be informed of the outcome of the investigation in some instances.

### 13. Making False Accusations

Air Distribution Technologies will protect any employee who raises a concern honestly, but it is a violation of the Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with a Code investigation. Honest reporting does not mean that we have to be right when we raise a concern; we have to believe that the information we are providing is accurate.

### 14. Non-Retaliation Statement

Air Distribution Technologies believes that it is essential to create a culture that empowers employees to speak up internally on matters of genuine concern without fear of retaliation and be assured that their concerns will be taken seriously, properly investigated, and kept confidential to the extent possible.

Air Distribution Technologies values the help of employees who identify potential problems that the company needs to address. Any employee who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reporting in good faith. Retaliation against anyone who provides information or otherwise assists in an investigation or proceeding regarding any conduct that the employee believes in good faith constitutes a violation of applicable laws or regulations, our Code of Conduct, or Air Distribution Technologies' related policies is prohibited and will, in itself, be treated as a violation of our Code of Conduct.

That an employee has raised a concern honestly, or participated in an investigation, cannot be the basis for any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.

If we work with someone who has raised a concern or provided information in an investigation, we should continue to treat the person with courtesy and respect. In case we are being subject to retaliation, we must report to the Legal & Compliance Department immediately.

## 15. Definition of “Good Faith”

Acting in "good faith" means we provide all the information we have and believe to be true at the time of reporting, even if it later turns out to be incorrect. Good faith reporting does not require absolute certainty of wrongdoing. Individuals who take action against a person for making a report or participating in an investigation in good faith will be subject to disciplinary action, up to and including termination, as local law permits.

## 16. Self-Reporting

Nothing in this Code of Conduct shall be construed as excusing any person from their own misconduct or protecting them from disciplinary action as a result of their self-reporting that misconduct. However, the fact that a person self-reported their own wrongdoing will be taken into consideration in determining an appropriate response.

## 17. Victims of Retaliation

If we have reasonable grounds to believe that we are being subjected to retaliation due to our disclosure of a legal or ethical compliance incident, or potential conflict of interest, we must immediately inform our Legal & Compliance Department.

## 18. General Manager Responsibilities

As a manager, you have the special responsibility for building a culture of trust and ethics within your teams. The way you display your commitment to company values and principles sets the standards for ethical behavior and trust for your team to follow. Your success depends upon promoting a team environment where compliance is expected, and ethical behavior is the norm. Under no circumstances can you ask your team to break the law, or go against the company's values, policies and procedures.

## 19. Manager Responsibilities – Serving as Ethical Role Models

As a leader, you are the ethical role model for your team members. Embodying the following will help you exemplify our corporate values and exhibit the highest standards of integrity:

- **Be Informative:** Help your team understand the seriousness of Air Distribution Technologies 's expectations for ethical conduct. Communicate your personal support for company values and purpose and be clear that you expect actions that are consistent with them.



- **Be Alert:** Always be on the lookout for situations or actions that may be unethical or potentially damaging to our reputation. Contact HR or Legal & Compliance immediately if you suspect such situations and be careful to avoid even the appearance of implicit approval.
- **Be Open:** Assure your team that you are willing to listen, even if they have something difficult to say. Foster an environment where your team members feel comfortable asking questions and expressing their ideas and opinions.

## 20. Manager Responsibilities – Handling Employee Reports

When your team member raises a concern, you must carry out the following actions to assure them that they have made the right decision in approaching you:

- **Listen Carefully:** Thank the person for taking the difficult decision of speaking up, even if you disagree with them. Listen closely to what they have to say and show that you're focused on resolving the issue.
- **Maintain Confidentiality:** To the extent possible, protect the employee's privacy. Avoid discussing the conversation with others on your team.
- **Be Objective:** Continue to treat all team members with the same degree of fairness even if they've reported a concern or are the subject of the report.
- **Escalate to the Right Channels:** While you may be tempted to take ownership of the concern, you must assess whether it needs to be escalated to HR or Legal & Compliance. If you have questions or aren't sure if you can resolve a concern on your own, consult your HR partner or Legal & Compliance Department.

## 21. Conflict of Interest - Introduction

Air Distribution Technologies believes business decisions should be made with integrity and not influenced by a conflict of interest. A conflict arises when our personal, social, political or financial interests, duties, obligations or activities, or those of a family member are, or may be, in conflict or incompatible with the interests of the Company.

Conflicts of interest expose our personal judgment and that of our company to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us. Having a conflict is not necessarily a problem, provided we promptly and fully disclose any situation that may involve an actual or potential conflict of interest. Employees should contact HR or the Legal & Compliance Department to make such disclosures or to report any questions, problems, or issues regarding conflicts of interest.

While it is impossible to list all activities that could pose a conflict of interest, the following are common examples:

- Financial Interest: Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business, or competes with our company.
- Outside Employment: Holding a second job that interferes with our ability to do our regular job, harms Air Distribution Technologies' business interests or breaks any employee agreements we have signed.
- Board Memberships: Employing, consulting, or serving on the board of a competitor, customer, supplier, or other service provider.
- Employment of Relatives & Friends: Hiring a supplier, distributor, or other agent managed or owned by a relative or close friend.
- Gifts & Entertainment: Soliciting or accepting any cash, gifts, entertainment, or benefits that are more than modest in value from any competitor, supplier, or customer.
- Corporate Opportunities: Taking personal advantage of corporate opportunities (e.g., leveraging client relationships for personal gains).

## 22. Financial Interest

Conflicts of interest may arise if either us or our family member has a substantial financial interest in an Air Distribution Technologies supplier, competitor or customer.

## 23. Outside Business and Other Interests

A conflict of interest exists if our outside business or other interests can affect our objectivity, motivation, or performance as an Air Distribution Technologies colleague. A second job or other affiliation with an Air Distribution Technologies competitor is not allowed (other than in connection with our work for Air Distribution Technologies, with appropriate approvals). A second job or other affiliation with an Air Distribution Technologies customer, supplier, or provider of goods or services is discouraged but may be allowed with proper approval. When outside employment is allowed, colleagues are still bound by all confidentiality agreements with Air Distribution Technologies and all Air Distribution Technologies policies and procedures relating to confidential or inside information.

## 24. Outside Director/Board Memberships, Officer, and Trustee Positions

Serving on the board of directors or an advisory committee of for-profit and non-profit organizations may present many opportunities for conflicts of interest. Before agreeing to become a member of the board of directors or an advisory committee of any for-profit organization, we should contact the Legal & Compliance Department to determine the relationship, if any, existing between our company and the for-profit organization.

To ensure activities relating to non-profit or community organizations do not create a conflict of interest or other problems, we should notify our supervisor of our prospective membership before agreeing to the board service. Air Distribution Technologies disallows all employees from serving on the board of directors of a company or organization, which raises the potential for a significant conflict of interest (e.g., certain competitive, supplier, or customer relationships).

If approved for serving on the board of directors of an outside company or organization, employees may not conduct outside business during working hours or use company assets or information in any work for another business.

## 25. Employment of Relatives & Friends

Air Distribution Technologies discourages us from hiring close personal friends or relatives in the same business unit, as it could lead to a potential conflict. The actions of family members and friends outside the workplace can also create a conflict if they affect our objectivity in the workplace.

Air Distribution Technologies considers the following as a 'relative':

- A husband or a wife, parents and stepparents; children and stepchildren; brothers and sisters; stepbrothers and stepsisters; nephews and nieces; aunts and uncles; grandparents; grandchildren; and in-laws.
- Domestic partners (whether or not officially recognized under local law) and romantic partners also count as relatives.
- If we are unsure whether a person is a relative, we must contact the Legal & Compliance Department for guidance.

## 26. Corporate Opportunities

We have a duty to our company to advance our legitimate interests should the opportunity arise. We should not take personal advantage of the opportunities or favors offered to us by virtue of our employment with Air Distribution Technologies.

We must be respectful of company property, information, and position, and make sure that neither we nor our family members use them for personal gain. We should not accept discounts on personal purchases of a supplier or customer's products or services unless such discounts are offered to all employees in general.

## 27. Confidential Information

We maintain trust with our investors and the public by respecting financial laws, which means we do not trade based on material nonpublic information. In our work, we may become aware of material, nonpublic information about Air Distribution Technologies or companies we do business with. Information is "material" if a reasonable investor would consider it important in deciding whether to buy or sell securities.

Information is "nonpublic" if it has not been broadly communicated to the investing public. Information is not considered public until the first business day after it has been disclosed to the public.

Trading or enabling others to trade stock or the stock of any other company – customer, supplier, competitor, potential acquisition or alliance – based on this information not only breaks trust with our investors and the public, but is also illegal, violates company policy, and is unfair to other investors. To use material non-public information in connection with buying or selling securities, including "tipping" others who might make an investment decision based on this information, is also unethical and illegal.

The prohibition against insider trading also applies to our family members or anyone else living in our household and any entities over whose transactions in Air Distribution Technologies we have influence or control.

## 28. Anti-Corruption/Anti-Bribery

No matter where in the world we work, there is an applicable anti-bribery law or policy, such the Foreign Corrupt Practices Act (FCPA) in the US.

As an Air Distribution Technologies employee, we cannot offer or provide bribes or other improper benefits to any officer, agent, or independent contractor acting on our behalf to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering, promising, giving, or authorizing anything of value (including but not limited to gifts, money, favors, or promises) to any person to influence or induce action, or to secure an improper advantage. In the USA, the FCPA and other laws prohibit payment of any money or anything of value to a foreign official, foreign political party (or official thereof), or any candidate for foreign political office to obtain, retain, or direct business. All employees, officers, agents, and independent contractors acting on behalf of Air Distribution Technologies are expected to strictly abide by these laws.

If we require help understanding any of these laws, we must contact the Legal & Compliance Department.

## 29. Bribes to Customers, Suppliers, and Government Agencies

Bribery and improper payments can also arise in situations that do not involve a government official. While exchanging modest gifts and entertainment may help build business relationships, we must ensure all such exchanges comply with applicable laws and company policies. However, we must conduct business with customers, suppliers, and government agencies (including U.S. and non-U.S. governments) without giving or accepting bribes including (but not limited to) commercial bribery and kickbacks.

- Commercial bribery involves a situation where something of value is given to a current or prospective business partner intending to obtain business or influence a business decision improperly.
- Kickbacks are agreements to return a sum of money to another party in exchange for making or arranging a business transaction.

We must avoid participating in commercial bribery and kickbacks, or even the appearance of them, in all our business dealings. Even in locations where such activity may not technically be illegal, it is absolutely prohibited by our company policy. Moreover, we must only work with business partners who have a reputation for integrity and report any signs that a representative is unethical or could be paying a bribe.

If we wish to report a bribery case or have questions regarding how anti-bribery applies to us, we must contact the Legal & Compliance Department.

## 30. Anti-Trust & Fair Competition

We believe in free and open competition. In addition, in most of the countries where we operate, strict laws, similar to antitrust laws in the United States, prohibit collusive or unfair business behavior that restricts free competition. United States antitrust and other countries' competition laws are quite complicated, and failure to adhere to these laws could result in significant penalties imposed on both Air Distribution Technologies and the employees who violated the law.

It is strictly prohibited by law to enter into any agreements or understandings with competitors, whether formal or informal, to fix prices, engage in bid rigging, set terms of sale, control production output, or divide markets or customers.

In addition, attempts to discriminate in prices or terms of sale among our customers, or to otherwise restrict the freedom of our customers to compete, may sometimes be illegal. Legal issues may also arise if we refuse to deal with certain customers or competitors.

### 31. Anti-trust and Fair Competition Violations Not Involving Competitors

Depending on business justification and the effect on competition, other practices that do not involve competitors may result in civil violations of antitrust and competition laws. These practices include:

- Exclusive dealing,
- Bundling/package offerings,
- Resale restrictions and
- Selective discounting.

We should contact our supervisor or the Legal department with questions about the legality of practices or conduct under the antitrust and competition laws. If we become aware of any potential violations, contact the Legal & Compliance Department or report anonymously through the Helpline at:

- Web intake site – <https://airdistribution.ethicspoint.com>
- Mobile intake site – <https://airdistributionmobile.ethicspoint.com>
- Hotline – phone numbers available on the web intake site

### 32. Competitive Intelligence

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice. Doing so helps us stay competitive in the marketplace; however, we must never use illegal or unethical means to get information about other companies.

Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the Internet. We may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) by obtaining a license to use the information or purchasing the ownership of the information. When working with consultants, vendors, and other partners, we must ensure they understand and follow Air Distribution Technologies policy on gathering competitive information.

### 33. Gifts & Entertainment

The two most common thresholds for gifts and entertainment provided to government officials include a blanket prohibition on all gifts or a "reasonableness standard" that is, a gift that a reasonable person would not consider excessive or have attached obligations or expectations (stated or implicit).

Modest gifts, favors, and entertainment are often used to strengthen business relationships. However, no gift, favor, or entertainment should be accepted or given if it obligates, or appears to obligate the recipient or if it might be perceived as an attempt to influence fair judgment. Unless we have supervisory approval, we should not provide any gift or entertainment to customers, suppliers, or others that we would not be able to accept from a customer, supplier, or other applicable parties.

- Never give or accept cash or its equivalent in connection with a business transaction.
- Never promise or make loans or investments of any kind without first fully complying with the prior authorization policy and applicable record keeping requirements.

Our employees, officers, directors, family members, agents or agent's family members are prohibited from offering, accepting, or receiving a gift or entertainment if it:

- Is in cash or cash equivalents (like prepaid or gift cards),
- Is not consistent with customary business practices,
- Is extravagant in value such as exceeding \$200 per individual gift or a cumulative total of \$500 from a single source within a calendar year.
- Can be construed as a kickback, bribe or payoff in violation of any law, including a bribe to a government official in violation of the U.S. Foreign Corrupt Practices Act,
- Violates any other laws or regulations, or
- Could cause embarrassment to or discredit our company if disclosed.

Specific laws apply to interactions with government officials and employees. For example, the USA and other countries have strict rules that prevent providing anything, including food or beverages, to a government employee. When doing business with government agents, employees, or officials, we must ensure we understand applicable laws as well as local customs and norms.

When we are not certain if any gift or proposed gifts are appropriate, we must discuss them with our supervisor or the Legal & Compliance Department.

### 34. Maintaining Accurate Financial Records - Introduction

Keeping accurate and reliable records is crucial to maintaining investor trust in our business, making good business decisions and meeting regulatory requirements. Investors rely on accurate and easily comprehensible information to understand our financial results and our business direction. Air Distribution Technologies is committed to recording, processing and analyzing financial information accurately and in accordance with legal and ethical business laws to earn investor trust. We also strive to ensure that this information is secure and readily available to those who need to access it.

Financial records include payroll, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business. All company records must be complete, accurate and reliable in all material respects. There is never a reason to make false or misleading entries. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited.

### 35. Maintaining Accurate Financial Records – List of Unacceptable Activities

To provide stakeholders with accurate information and help them make informed decisions, we must refrain from undertaking the following activities:

- Maintaining undisclosed or unrecorded funds or assets for any purpose.
- Making, or asking others to make, false, misleading or artificial entries on an expense report, time sheet or any other report.
- Giving false quality or safety results.
- Recording false sales or recording sales outside of the time period they actually occurred.
- Understating or overstating known liabilities and assets.
- Delaying the entry of items that should be current expenses.
- Hiding the true nature of any transaction.
- Providing inaccurate or misleading information for company benefit programs.

### 36. Maintaining Accurate Financial Records – Employee Responsibilities

Reporting accurate, complete and understandable information about our business and financial condition is an essential responsibility for each of us. We must ensure the following behaviors in our day-to-day activities:



- Comply with our records management policies and retention schedules for all business records (paper or electronic).
- Follow established corporate retention requirements before we dispose of any business record.
- Make open and full disclosure to, and cooperate fully with, outside accountants in connection with any audit or review of our company's financial statements.
- Review all expenses submitted by our team members and ensure they are accurate and truthful before approving them.

Additionally, we have the responsibility to report immediately to our manager, the Chief Financial Officer, the Controller, or the Legal & Compliance Department during the following circumstances:

- We have reason to believe that any of our company's books and records are being maintained in a materially inaccurate or incomplete manner.
- We are being pressured to prepare, alter, conceal, or destroy documents in violation of our company policy.
- We believe someone has made a misleading, incomplete, or false statement to an accountant, auditor, attorney or government official in connection with any investigation, audit, examination or filing with any government agency or regulatory body.

## 37. [Protection of Intellectual Property & Confidential Information - Introduction](#)

### [Confidential Information](#)

In carrying out the Air Distribution Technologies business, employees, officers and directors often learn confidential or proprietary information about our company, its customers, prospective customers, or other third parties. Confidential or proprietary information includes, among other things, any non-public information concerning Air Distribution Technologies, including its business, financial performance, results or prospects, and any nonpublic information provided by a third party with the expectation that the information will be kept confidential and used solely for the business purpose for which it was conveyed. Unauthorized disclosure of confidential information can result in serious harm to Air Distribution Technologies, including loss of competitive advantage, damage to business relationships, and potential legal liability. Hence, we must protect the confidentiality of all information entrusted to us, except when disclosure is authorized or legally mandated. Upon termination of employment or upon request by the company, all

confidential information must be returned to Air Distribution Technologies or destroyed in accordance with company policies and procedures.

### Intellectual Property & Protecting IP

Our intellectual property is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property. It also includes work products created by employees in connection to our work duties and/or or using company time, resources or information (e.g., inventions, discoveries, artwork, software, etc.). We must protect and, when appropriate, enforce our intellectual property rights. We also respect the intellectual property belonging to third parties. It is our policy to not knowingly infringe upon the intellectual property rights of others.

### 38. Trademarks, copyright, and patents

We value and encourage the protection of our intellectual property (such as patents, trade secrets, copyrights and trademarks) and proprietary information while simultaneously respecting the valid intellectual property rights of third parties. Intellectual property laws protect many materials that we may use during our employment.

Copyright laws protect materials such as computer software, music, artwork, audio, and videotapes, books, presentations, and training materials. Patent laws protect inventions, trade secret laws protect proprietary information, and trademark laws protect product and services names.

### 39. Sharing with Permission

Unless sharing information with external suppliers and customers is against the law or company or business practice, Air Distribution Technologies encourages sharing information when it may improve the quality or use of our products. If Air Distribution Technologies' proprietary information is to be given outside the company, we must ensure that a written confidentiality and nondisclosure agreement is prepared and that proper controls are established to manage the flow of information. Connect with the Legal & Compliance Department if you need a confidentiality agreement.

#### 40. Communicating with External Parties

As employees of Air Distribution Technologies, we are not authorized to speak with the media on behalf of our company unless authorized by our Legal & Compliance Department or HR. We may also not give the impression that we are speaking on behalf of Air Distribution Technologies in any communication that may become public unless authorized. This includes posts to online forums, social media sites, blogs, chat rooms and bulletin boards. This policy also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services.

#### 41. Directions to Employees Regarding Outside Inquiries

To ensure professional handling, we must redirect any media requests to our Legal & Compliance Department.

#### 42. Protection of Company Assets & Resources

Air Distribution Technologies relies on us to act as an owner of company resources and use them honestly and efficiently so we can better serve our guests and maintain value for our stakeholders. We must use Air Distribution Technologies' assets — whether they are merchandise, vendor samples, corporate credit cards, cash or information — solely for the benefit of the company. These assets are not for personal gain or for the benefit of others outside of Air Distribution Technologies.

We must spend Air Distribution Technologies funds wisely and keep Air Distribution Technologies' assets safe from loss, theft, damage, inappropriate use or other forms of fraud.

In case we suspect theft in the workplace, or become aware of misuse of company assets, we must report it immediately to HR, the Legal & Compliance Department or the Ethics' Hotline:

- Web intake form – <https://airdistribution.ethicspoint.com>
- Mobile intake form – <https://airdistributionmobile.ethicspoint.com>
- Hotline – phone numbers available on the web intake site

#### 43. Records Management – Introduction

Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business. Records consist

of all forms of information created or received by Air Distribution Technologies, whether originals or copies, regardless of media. Examples of company records include paper documents, e-mail, electronic files stored on hard drive, disk or any other medium (CD, DVD, USB data storage devices, etc.) that contains information about our company or our business activities.

All records are the property of Air Distribution Technologies and should be retained in accordance with our Records Retention Policy. We are responsible for properly labeling and carefully handling confidential, sensitive, and proprietary information and securing it when not in use. We do not destroy official company documents or records before the retention time expires but do destroy documents when they no longer have useful business purpose.

For more specific retention and destruction guidelines, we may refer to Air Distribution Technologies Records Retention Schedule.

#### 44. Records Management – Employee Responsibilities

We must retain or discard Air Distribution Technologies' records in accordance with the record retention policies. Air Distribution Technologies Legal & Compliance Department occasionally may issue notices regarding retention of records in the case of actual or threatened litigation or government investigation. We must abide by the directions contained in these notices, as failure to do so could subject the Company and employees to serious legal risks.

If we have questions about the record-keeping requirements that apply to our jobs, we must contact the Legal & Compliance Department.

#### 45. Data Privacy – Introduction

Air Distribution Technologies respects the privacy of all its employees, business partners and consumers. We must handle personal data responsibly and in compliance with all applicable privacy laws and company policies (including our records retention requirements). Personal data is information that can directly or indirectly identify an individual, such as name, contact information, and health-related information. As employees who handle the personal data of others, we must:

- Act in accordance with applicable laws;
- Act in accordance with any relevant contractual obligations;
- Collect, use and process such information only for legitimate business purposes;

- Provide clear and accurate privacy notices when collecting or processing personal data.
- Limit access to the information to those who have a legitimate business purpose for seeing the information;
- Securely store, transmit and destroy personal information in accordance with applicable policies and laws; and
- Take care to prevent unauthorized disclosure.

We should refer to Air Distribution Technologies' Privacy Policy for additional guidance on handling personal data and a description of protected information.

#### 46. Employee Information

Air Distribution Technologies respects the confidentiality of employees' personal information. This includes employee medical and personnel records. Access to personal information is only authorized when there is a legitimate and lawful reason, and access is only granted to appropriate personnel. Requests for confidential employee information from anyone outside our company under any circumstances must be approved following our policies. However, it is important to remember that employees should have no expectation of privacy concerning everyday course workplace communication or any personal property brought onto Air Distribution Technologies premises or used for Air Distribution Technologies business.

#### 47. Privacy Laws

Protecting the privacy and security of personal information is a growing global concern. Many countries are enacting or strengthening privacy laws that govern the use of personal information and holding violators accountable. Air Distribution Technologies is committed to complying with applicable privacy laws in the countries where we conduct business, including laws regarding the cross-border transfer of certain personal information. For more information on Air Distribution Technologies' commitment to privacy and to understand what types of information are considered personal or sensitive according to applicable local laws, please refer to our Privacy Notice or contact the Legal & Compliance Department.

#### 48. Our Commitment to Equal Employment Opportunity– Introduction

At Air Distribution Technologies, we believe we perform at our best when our work environment welcomes individuals with different perspectives, characteristics, values,

and backgrounds. Such an environment also helps us attract and retain the best talents and reach even higher employee and customer satisfaction levels.

At Air Distribution Technologies, we do not discriminate against anyone because of their race, color, age, sex, national origin, genetic information, disability, sexual orientation, religion, veteran status, marital status, political belief, gender identity, ancestry, socioeconomic status, and other factors protected by federal, state or local law.

- We support each other to embody respectful behaviors in our day-to-day duties and interactions.
- We are committed to hiring people from all walks of life and to providing reasonable accommodation for employee needs, such as pregnancy, nursing, disability and religious needs.
- We do not tolerate discrimination or harassment when directed at anyone because of any characteristic protected by federal, state or local law.

#### 49. Equal Employment Opportunity is our Responsibility

Having a workforce made up of team members who bring a wide variety of skills, abilities, experiences and perspectives is essential to our success. We are committed to the principles of equal employment opportunity through the following ways:

- We base all employment-related decisions purely on company needs, job requirements and individual qualifications. We do not consider any protected classifications when making employment-related decisions.
- We comply with all applicable employment laws, rules and regulations.
- We observe equal employment opportunities in all aspects of employment, including activities relating to recruiting, hiring, benefits, leaves of absence, training, transfer, promotion, job assignments, compensation, corrective action and termination.
- We provide reasonable accommodation to qualified employees who have protected disabilities, and/or needs related to religion, pregnancy and/or breastfeeding. We remove any artificial barriers to success.
- We comply with laws regarding employment of immigrants and noncitizens and provide equal employment opportunity to everyone who is legally authorized to work in the applicable country.

If we believe equal opportunity is not being followed, we must contact our manager or Human Resources, or follow the Speak Up Process, by reporting using the following tools:

- Web intake form – <https://airdistribution.ethicspoint.com>

- Mobile intake form – <https://airdistributionmobile.ethicspoint.com>
- Hotline – phone numbers available on the web intake site

If we wish to request reasonable accommodation, we must contact our manager or Human Resources and provide information which may be needed to support our request.

## 50. Day-to-day activities

We are responsible for creating a culture of trust and respect that promotes a positive and respectful work environment every day. This means treating each other fairly and courteously in all our interactions in the on-site and virtual workplace. In our day-to-day activities, we embody the following values:

- We treat others with courtesy, respect, understanding and forgiveness
- We encourage others to share their perspectives and opinions confidently, even when they differ from our own.
- We are open to our colleagues' perspectives and opinions and take full advantage of what they have to offer. We understand that openness to different perspectives helps us make informed work decisions.
- We understand that we are all individuals with different experiences and struggles, and we are always willing to listen to and help each other regardless of our differences. We listen to others with curiosity to learn and to understand their perspectives.
- Speak Up: We speak up when we think we or our colleagues are being harassed or discriminated against.

## 51. Anti – discrimination / Anti – harassment

Intimidating or abusive behavior can seriously damage the victims, our work environment, and our reputation. At Air Distribution Technologies, we do not tolerate any form of unlawful discrimination or harassment. Prohibited harassment is defined as: unwelcome and offensive conduct directed at anyone based on race, color, age, sex, national origin, genetic information, disability, sexual orientation, religion, veteran status, marital status, political belief, gender identity, gender expression, ancestry, socio-economic status, pregnancy, or other factors protected by law. Harassment means unwelcome conduct that becomes a condition of continued employment or conduct that is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile or abusive. While the legal definition of harassment may vary by jurisdiction, our company prohibits such conduct regardless of whether it rises to the level of unlawfulness.

Harassment is not limited to the physical workplace. It can occur in the virtual workspace, or when employees are travelling for business or at employer or industry-sponsored events. Calls, texts, emails and social media usage can contribute to unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices, during video platform meetings or during non-work hours.

We consider the following non-exhaustive list to be unacceptable behavior:

- Unwelcome behavior, such as verbal or physical conduct that threatens, intimidates or coerces
- Verbal taunting (including racial and ethnic slurs, inappropriate jokes or language)
- Negative stereotyping
- Racial, ethnic, gender or religious slurs
- Biased jokes and gestures directed at or about a person because of characteristics protected by law, for example, jokes about someone's sexual prowess, promiscuity, masculinity, femininity, religion, skin color, nationality and the like.
- Bullying, yelling, name-calling
- Forcing impromptu interactions, during non-working hours
- Displaying pornography or offensive pictures, graffiti, posters and the like.

Along with these, Air Distribution Technologies prohibits all forms of sexual harassment, including but not limited to:

- Unwelcome sexual comments, advances, requests for sexual favors
- Unwelcome repeated requests for dates, gift-giving, romantic gestures
- Physical acts of a sexual nature, such as touching, kissing, hugging, grabbing, poking.
- Sexual assault, sharing of sexually oriented messages, emails or media
- Dressing unprofessionally, including clothing with sexually demeaning content or innuendo
- Accessing inappropriate or insensitive material during company time, on company devices or involving company personnel, or sharing such conduct
- Taking pictures /screen captures, for example, during video calls without permission or circulating such images on social media
- Other verbal or physical conduct of a sexual nature that either: (1) involves submission to the conduct as either an explicit or implicit term or condition of employment, or submission to or rejection of the conduct is used as the basis for making employment decisions affecting an individual (known as "quid pro quo" harassment); or (2) has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment (known as "hostile work environment" harassment).



If we believe our rights have been violated or if we have any other workplace concerns, we should consult our supervisor, another member of our management chain, or contact a Human Resources representative directly.. If we do not receive a clear explanation or believe we may not receive an objective or adequate review of the issue from our supervisor or Human Resources, we can call the Ethics Helpline We may also submit complaints anonymously through established reporting channels. Air Distribution Technologies recognizes the sensitive nature of these claims and will work to ensure confidential treatment of the allegations in order to protect all involved. Of course, retaliation against any employee who reports harassment will not be tolerated.

Supervisors and managers have a responsibility to prevent unlawful harassment and discrimination. All supervisors and managers who receive a complaint or information about suspected harassment, observe what may be harassment, or otherwise suspect that harassment may be occurring, should act to communicate the expectation of non-discriminatory workplace behavior, and should contact Human Resources to ensure that the company responds to prevent further problems.

## 52. Personal Political Activity with Ethical Guidelines

Air Distribution Technologies encourages personal participation in the political process in a manner consistent with all relevant laws and Company guidelines.

We may support candidates or organizations of our choice through personal contributions or by volunteering so long as we separate our personal political activities from our work. This ensures that we maintain transparency, honesty and integrity with our stakeholders and each other. To continue lawful participation in politics:

- We respect the political opinions of all our colleagues, even if they are different from ours, and do not force our views on them.
- We do not conduct political activities on company time or use company resources such as telephones, computers, or other supplies.
- We do not use Air Distribution Technologies letterhead, company e-mail, or reference our business address or title when we express a personal view in a public forum (such as a letter to the newspaper).
- We do not expect Air Distribution Technologies to reimburse us for personal political activity.
- We must inform and obtain prior approval from the Legal & Compliance Department when we run for office or get appointed or elected to office

- We never contact lawmakers on behalf of the Company or lobby with lawmakers for the Company's interests without explicit approval from the Legal & Compliance Department.

### 53. Compliance with Relevant Laws and Regulations (Political)

We recognize the need to engage in politics and socio-political issues as a Company and understand that our political contributions must be made following local law, approved per the Delegation of Authority, and properly recorded.

We may also communicate information or company opinion on socio-political issues that affect our company, employees, and the larger community. Additionally, we may make political contributions that must be approved by Legal & Compliance Department. However, we ensure that:

- We do not pressure employees to adopt the political beliefs or causes the Company supports.
- We ensure that jobs are not affected by employees' personal political views or choices in political contributions.
- We treat all employees equally, regardless of their political beliefs.
- We seriously consider employee sentiment around socio-political issues that we are expected to act on.

### 54. Environmental Commitment

Air Distribution Technologies is committed to conducting business in an environmentally responsible manner and strives to improve our performance to benefit our employees, customers, communities, shareholders and the environment. To do so:

- We use energy wisely and efficiently and employ technology to minimize any risk of environmental impact.
- We comply with all applicable environmental, health, and safety laws and regulations that apply to our operations.
- We educate and train employees on environmental, health, and safety matters, including compliance with relevant permits, laws, and regulations that apply to their work.
- We educate and engage our employees and inform external stakeholders in our environmental efforts
- We contribute to and partner with organizations that work towards environmental goals.
- We engage our supply chain in supporting our sustainability efforts

- We work with suppliers with demonstrable environmental commitments, to the extent we can.
- We have established and maintain comprehensive emergency response procedures and protocols to ensure the safety of our employees, protect the environment, and minimize potential impacts in case of unforeseen events. These procedures are regularly reviewed, updated, and communicated to all relevant personnel.

## 55. Community Involvement and Charity

Air Distribution Technologies is a vital part of the communities that host our facilities. We support development in the communities in which we work and throughout the world. We participate in many humanitarian and charitable endeavors through community partnerships, volunteer efforts, cash donations, charity drives and mentoring programs. We partner with community organizations that focus on building strong communities and helping under resourced communities earn and save more.

We encourage employees to actively participate and care for their communities through volunteering, donating, and conserving.

When we elect to participate in a community project and utilize limited employee time and company resources, site management communicates to employees in advance that the effort is a company-sponsored project.

We will continually challenge ourselves to define what being a responsible company means to us, and work to translate our definition into behavior and improvements at Air Distribution Technologies. We seek to align our social and environmental efforts with our business goals and continue to develop both qualitative and quantitative metrics to assess our progress.

## 56. Employee Volunteering and Contribution

Air Distribution Technologies encourages employees to give back to our communities by volunteering with organizations, donating to causes or participating in company outreach efforts. To ensure our contribution is legal and beneficial:

- We ensure all contributions and charity efforts are legal and ethical
- We do not use company resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by Air Distribution Technologies.
- We seek approval before using company resources, acting as a company representative or donating anything in the Company's name.

- We take advantage of opportunities at Air Distribution Technologies to give back, such as volunteer initiatives and matching gift programs.
- We encourage each other to volunteer for and support worthy causes
- We seek approval before assuming a Board position at any charitable or other non-profit institutions to determine the relationship, if any, existing between our company and the for-profit organization.

We must consult the Legal & Compliance Department or the Helpline if we have questions about permissible use of company resources.

## 57. Promoting Workplace Safety and Health

Air Distribution Technologies strives to provide a safe and healthy workplace for employees, customers and visitors to its premises. All managers have the responsibility of ensuring proper safety and health conditions for their employees. Management is committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene, ergonomics and safety. To support this commitment, we are responsible for observing all safety and health rules, practices and laws that apply to our jobs, and for taking precautions necessary to protect ourselves, our co-workers and visitors. We are also responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions to our supervisors. Threats, acts of violence and physical intimidation are strictly prohibited. Possession of weapons on the job or on Air Distribution Technologies premises is strictly prohibited, regardless of any weapons permits or licenses, unless previously and expressed authorized by Procurement or Legal & Compliance and strictly for security services.

No talk of violence or jokes about violence will be tolerated.

As is the case with any violation of the Code, we have a responsibility to report any unsafe behavior or condition regardless of whether we are directly involved or a witness.

## 58. Proper Use and Protection of Electronic Communications

Air Distribution Technologies' information technology and communications systems are vital to enable us to conduct our business and reach out to our consumers. If we have access to our information systems and computer networks, we are responsible for using the highest standards of behavior in all our usage and communications. When we access our networks from remote locations (for example, at home or from other non-company locations), we are subject to the same standards of use as are employees who access our networks while on company premises.

The data transmitted, received and stored by or within those systems, such as telephones, personal computers, data storage units, email, or pagers, are valuable assets that we must protect to ensure that these resources are accessible for business purposes, that Air Distribution Technologies' reputation is protected, and that we minimize the potential for legal risk. Limited personal use of company IT resources may be acceptable if it is authorized by our work location, does not interfere with our job responsibilities, complies with all company policies and security protocols, and does not create security risks or compromise company data. All personal use must comply with applicable data protection and privacy laws.

We must safeguard the following:

- **Passwords:** We are responsible for our corporate credentials. Passwords must meet corporate standards and must be kept private, and therefore not shared, coded into programs or written down. IT Security must be informed in the event that a password is suspected of having been compromised. We must not share our passwords with anyone at any time.
- **Mobile Security:** We must protect Air Distribution Technologies assets. It is extremely important that we treat our mobile device like any other Corporate IT device. Mobile device security can be breached and infected just like a PC, laptop, etc. We must never click links, download files, or execute programs on our mobile device unless it is required, and we are certain of the source and legitimacy of the content. We must always protect such items from loss, theft or damage.
- **Acceptable Usage:** We are not permitted to use Air Distribution Technologies information technology and communications systems (including email, instant messaging, the Internet or intranet) for activities that are harmful, unlawful, unethical, immoral or otherwise contrary to the Code.

## 59. Example of Inappropriate Computer Use

We must adhere to computer usage guidelines by refraining from the following:

- Using electronic media to initiate, save, or send items that are hostile, harassing, offensive, threatening, or otherwise inappropriate.
- Using electronic media to initiate, save, or send chain letters or other widespread non-business distributions.
- Using electronic media to initiate or participate in any malicious, unauthorized, or fraudulent use of company resources.

- Using Air Distribution Technologies electronic media for non-business purposes, in ways that don't comply with the policies of our business unit.

Remember: The unauthorized transmission of company data, access to inappropriate internet sites, and the transmission of inappropriate e-mails are examples of misuse of technology.

## 60. Anti-Boycott

U.S. anti-boycott laws prohibit individuals and entities from participating in a boycott that the U.S. does not support. Antiboycott laws help prevent U.S. companies from being used to implement foreign policies of other nations which run counter to U.S. policy.

Air Distribution Technologies does not cooperate with foreign boycotts that are not approved by the U.S. government. If we receive a request related to any boycott, we must not respond to the request and immediately contact the Legal & Compliance Department.

Additionally, doing business with certain countries may result in imposed economic sanctions. We must perform due diligence before any transaction that has an international element to determine whether such parties are on the U.S. government's restricted list.

We must contact the Legal department to ensure that all such transactions are properly evaluated to prevent potential violations.

## 61. Trade Compliance

Air Distribution Technologies is responsible for complying with national and global regulations, such as U.S. federal import and export laws, that relate to trading activities and the import and export of products, services and technology. These regulations are complex and may change quickly as governments adjust to new political and security issues. If our work involves international trade compliance, it is our responsibility to know, understand and follow the laws that apply to our work and the movement of our goods. We also expect all our vendors to know and understand the laws that apply to their products.

If we work in our supply chain, we (and our vendors) must provide accurate product descriptions, correct tariff classifications, valuation information and country of origin statements for all items we import or export, whenever required. If we have a question or concern, we must report it immediately.

## 62. Social Media

Social media is of growing importance in the marketplace. It enables us to learn from and share information with our stakeholders, as well as communicate with the public about our company. While doing so, we must be mindful that our social media posts may have unintended consequences that could impact both us and Air Distribution Technologies.

We must be mindful not to disclose confidential and/or proprietary information about our business, our suppliers or our customers. If we discuss Air Distribution Technologies-related matters on social media, we must make it clear that we are speaking for ourselves and not on behalf of Air Distribution Technologies.

If we publish content to any web site outside of Air Distribution Technologies and it has something to do with work we do or subjects associated with Air Distribution Technologies, we must use a disclaimer.

We may contact the Legal & Compliance Department to get further information.

## 63. Selection and Use of Third Parties

We believe in doing business with third parties that embrace and demonstrate high principles of ethical business behavior. We rely on suppliers, contractors, and consultants to help us accomplish our goals. They are part of the Air Distribution Technologies team and should be treated according to our values.

To create an environment where our suppliers, contractors, and consultants have an incentive to work with Air Distribution Technologies, they must be confident that they will be treated ethically. We offer fair opportunities for prospective third parties to compete for our business. How we select our suppliers and the character of the suppliers we select reflect how we conduct business.

## 64. Fair Dealing with Customers, Suppliers and Competitors

Air Distribution Technologies is committed to dealing fairly with its employees, customers, suppliers, and competitors. We are expected to promote Air Distribution Technologies products and services in a manner consistent with the customer's expressed financial needs and goals and to provide sufficient information to allow customers to make informed decisions voluntarily and without any form of coercion or undue influence.

We are prohibited from taking unfair advantage of anyone through manipulation,

concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

## 65. Truth in Advertising/Marketing

It is our responsibility to accurately represent Air Distribution Technologies and our products in our marketing, advertising and sales materials. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees are inconsistent with our values.

Sometimes it is necessary to make comparisons between our products and our competitors. When we do so, we make factual and accurate statements that can be easily verified or reasonably relied upon.

## 66. Providing Best Quality in Service and Products

We are dedicated to quality and take personal pride in all the products and services we provide. Our intense, acute focus on the needs of our customers continuously drives us to improve. Our continued success depends on exceeding the expectations of our customers and standing behind everything we do.

## 67. Government Customer and Contracting

When doing business with federal, state, or local governments, we must ensure all statements and representations to government procurement officials are accurate and truthful, including costs and other financial data. If our assignment directly involves the government or if we are responsible for someone working with the government on behalf of Air Distribution Technologies, we must be alert to the special rules and regulations applicable to our government customers. We must take additional steps to understand and comply with these requirements and avoid any conduct that could appear improper when dealing with government officials and employees. Payments, gifts, or other favors given to government officials or employees are strictly prohibited, as such actions may constitute or appear to constitute improper influence or bribery under applicable anti-corruption laws.

Failure to avoid these activities may expose the government agency, the government employee and us to substantial fines and penalties. For these reasons, any sale of our products or services to any federal, state, or local government entity must be in accordance with our Company policy.



## 68. Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate. It is important to note that this practice is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose Air Distribution Technologies and individuals to severe sanctions.

Our Company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

We must be alert for the following red flags:

- Requests for cash payment, traveler checks or checks from an unknown third party
- Complex payment patterns
- Unusual transfers to or from countries not related to the transaction
- Customers who seem eager to avoid recordkeeping requirements
- Transactions involving locations previously associated with money laundering or tax evasion
- Transactions which are inconsistent with usual business practices, or which do not match the customer's or client's normal pattern of activity.

## 69. Government Request and Subpoenas

We should immediately contact the Legal & Compliance Department if we are contacted by law enforcement or other government officials with respect to our duties in most circumstances.

Notwithstanding any other provisions in this Code, employees are not required to disclose to Air Distribution Technologies if any governmental or regulatory entity has contacted them regarding possible violations of federal, state, or local laws, rules, or regulations. do

not need the prior authorization of Air Distribution Technologies to disclose to any governmental or regulatory entity information regarding possible violation of any federal, state, or local law, rule, or regulation; and do not need to disclose to Air Distribution Technologies that the associate has made such a disclosure.

Any information we provide to law enforcement or government officials must be completely honest and truthful.

If we receive a subpoena related to Air Distribution Technologies or our work, we must immediately contact the Legal & Compliance Department.

If we become aware of pending, imminent or contemplated litigation or a government examination or investigation, we must immediately contact the Legal & Compliance Department.

Pursuant to the Legal Hold Order Policy, we must also save all records and documents that may be relevant to the subpoena, litigation or investigation, including any records that may otherwise be automatically destroyed or erased (such as e-mail and voice mail messages)

## 70. Substance Abuse/Drug and Alcohol-Free Workplace

Air Distribution Technologies strives to maintain a workplace that is free from illegal use, possession, sale, or distribution of alcohol or controlled substances.

Legal or illegal substances shall not be used in a manner that impairs a person's performance of assigned tasks.

Air Distribution Technologies reserves the right, in accordance with applicable state and federal laws, to require drug or alcohol testing of any employee when there is reasonable suspicion that they are under the influence of drugs or alcohol in the workplace. If we are using prescription or non-prescription drugs that may impair alertness or judgment or witness an employee impaired and therefore possibly jeopardizing the safety of others or Air Distribution Technologies business interests, we must report it immediately. If we have a problem related to alcohol or drugs, we may seek assistance from the Employee Assistance Program or other qualified professionals and review the Air Distribution Technologies Substance Abuse Policy.

## 71. Workplace Violence

To preserve employee safety and security, weapons, firearms, ammunition, explosives and incendiary devices are forbidden on Air Distribution Technologies premises or in our company vehicles.

In addition, we do not tolerate acts or threats of violence, including extreme or inappropriate verbal or physical threats, intimidation, harassment and/or coercion.

Behavior that threatens the safety of people or property, or has the potential to become violent, should be immediately reported to our supervisor, Security, HR, or the Air Distribution Technologies Ethics Hotline.

## 72. Fraud

It is never acceptable to take any part, no matter how small our role, in any activity that involves theft, fraud, embezzlement, extortion or misappropriation of property. An employee participates in a fraud any time helps conceal, alters, falsifies or omits information in Air Distribution Technologies records either for their benefit or at the direction of any others.

We must refuse to engage in any questionable activities and must follow up any suspicions.

## 73. Human Rights & Fair Labor

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect.

We require our suppliers and direct contractors to demonstrate a serious commitment to the health and safety of their workers and operate in compliance with all applicable human rights laws, including but not limited to modern slavery legislation (such as the UK Modern Slavery Act 2015, California Transparency in Supply Chains Act, Australia Modern Slavery Act 2018, Mexico's Federal Labor Law provisions against forced labor, India's Bonded Labour System (Abolition) Act, China's Labor Law and Criminal Law provisions against forced labor, Thailand's Anti-Trafficking in Persons Act, and UAE Federal Law No. 51 of 2006 on Combating Human Trafficking) and conflict minerals regulations (including Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act). Air Distribution Technologies strictly prohibits and does not condone the use of forced labor, slave labor, human trafficking, or child labor in any form. We denounce any degrading treatment of individuals or unsafe working conditions, and we are committed to ensuring our supply chain and products are free of conflict minerals as defined by applicable laws

and regulations. We maintain appropriate due diligence processes to verify compliance with these requirements.

We are committed to following all applicable wage and hour laws and regulations. Anyone who is paid based on hours worked must report and record all the time worked accurately, including overtime hours, in accordance with established local procedures, applicable regional requirements, and federal and state wage and hour laws. False or misleading timekeeping records are strictly prohibited.

#### 74. Waiver Provision

Air Distribution Technologies will waive the application of the policies outlined in this Code only in exceptional circumstances where: (i) the waiver is necessary to comply with applicable laws or regulations, (ii) the waiver would not violate any applicable laws or regulations, (iii) the waiver is determined to be in the best interests of Air Distribution Technologies and its stockholders, and (iv) appropriate alternative compliance measures are implemented.

Any waiver for an employee must be approved in writing by both the Legal & Compliance Department and the Chief Executive Officer and documented with a detailed explanation of the circumstances and justification for the waiver.

Waivers of the Code for directors and executive officers may be made only by those members of the Executive Leadership team not involved in the possible waiver and must be promptly disclosed as required by law or regulation.