



# Holland Heater Pocket Guide

to ethics and business conduct for  
business partners

## Content

1. Integrity in all things.
2. What is FCPA?
3. What is expected of you as a business partner of Holland Heater?
4. Examples of illegal or unethical behavior.
5. How to report illegal or unethical conduct.

## 1. Integrity in all things

Integrity is one of the core values of Holland Heater.

All third parties doing business with Holland Heater are expected to conduct themselves in accordance with the highest legal, moral and ethical standards. These standards require laws that apply to Holland Heater's business, as well as abiding by all Holland Heater policies and procedures.

This pocket guide serves as a brief reference guide to policies addressed more thoroughly in CTB's Business Conduct Policy, which is applicable to Holland Heater. This guide does not replace the policy, and individuals are responsible for being familiar with the policy and promoting Holland Heater values, standards of conduct, the policies and guidelines. Copies of the Business Conduct Policy may be obtained on our website or through your regular contact at Holland Heater.

Any individual with information about illegal or unethical behavior has a responsibility to promptly report such information.

## 2. What is FCPA?

The Foreign Corrupt Practices Act (FCPA) makes it illegal for companies and their supervisors to influence anyone with any personal payments or rewards.

This is being accomplished in two ways:

1. Through anti-bribery provisions.
2. Through accounting and record-keeping provisions.

The act applies to:

- / Any citizen or resident of the USA and to any company - and its subsidiaries - that is organized under the laws of the USA.
- / Any person who has a certain degree of connection to the United States and engages in foreign corrupt practices, whether or not they are physically present in the USA.
- / The acts of US businesses and nationals in supporting of unlawful payments anywhere in the world — even payments that take place wholly outside the USA.

This means that the FCPA is also applicable to companies like Holland Heater and its business partners.

### 3. What is expected of you as a business partner of Holland Heater?

All business partners should behave at all times in a manner that reflects the spirit and intent of Holland Heater's policies and values.

This means that the following conduct is prohibited:

- / Theft, fraud, embezzlement, misappropriation and/or conversion of Holland Heater property.
- / Bribery.
- / Falsification of documents.
- / Destruction of documents (except where authorized by Holland Heater policy).
- / Disclosure of confidential information (except where legally authorized).
- / Misuse, disclosure or distribution of proprietary information of Holland Heater or others.
- / Failure to use safety procedures and equipment.
- / Harassment and/or violence.
- / Discrimination.
- / Conflicts of interest.
- / Noncompliance with antitrust, competition and/or securities laws.
- / Dishonesty, abuse of privileged information, misrepresentation of facts or any other unfair practices.

### 4. Examples of illegal or unethical behavior

- / A company provides someone with money (or some other benefit) in order to gain an unfair business advantage.
- / A company sells a Holland Heater product in a country that is in violation of US or EU embargo
- / A company participates in a business transaction on behalf of Holland Heater, where the companies' relationships and/or activities outside of Holland Heater create an appearance of impropriety.
- / A company provides incorrect information about its organization.

### 5. How to report illegal or unethical conduct?

Please contact your regular contact at Holland Heater.

### Contact Holland Heater

#### **Holland Heater De Lier B.V.**

Leehove 2, 2678 MC De Lier  
NETHERLANDS

Telephone: +31 174 - 516741  
E-mail: [info@hollandheater.nl](mailto:info@hollandheater.nl)



a company of the Roxell Group