



# Index of the Code of Ethics (CoE) and Code of Conduct (CoC)

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## Introduction to the Code of Ethics and Conduct

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### Purpose and Scope of the Code of Ethics and Conduct (CoE, CoC)

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The **Code of Ethics (CoE)** and **Code of Conduct (CoC)** for **OPENERS & CLOSERS** serve as the cornerstone of our commitment to maintaining the highest ethical standards in all aspects of our business. These codes provide a comprehensive framework for guiding the behavior, decisions, and actions of every individual within our organization. While the Code of Ethics outlines the fundamental principles and values that define **why** we operate in an ethical manner, the Code of Conduct specifies **how** these values are put into practice through specific behaviors, rules, and processes.

- **The Code of Ethics (CoE):** This document is the ethical compass of our organization, articulating the **core values** and **principles** that should inform every decision and action. It explains the philosophical underpinnings of **why** we prioritize integrity, respect, responsibility, and other core values in our business dealings. It answers the deeper question of why ethics is central to our identity as a company.

- **The Code of Conduct (CoC):** While the CoE lays the foundation, the CoC is the operational manual for ethical behavior in **daily activities**. It provides clear and actionable guidelines on **how** employees, leaders, and partners should behave in various scenarios, ensuring alignment with the values described in the CoE. The CoC gives practical, enforceable standards that help create consistency, transparency, and accountability throughout the organization.

Together, these two codes function synergistically to promote an environment where ethical decision-making and responsible conduct are at the heart of **OPENERS & CLOSERS'** corporate culture. The CoE emphasizes the **"why"** behind our actions---the values and purpose that drive us---while the CoC focuses on the **"how"**---the concrete behaviors and expectations that ensure ethical integrity across all operations.

## Importance of Ethical Leadership (CoE)

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At **OPENERS & CLOSERS**, we recognize that ethical leadership is essential to fostering a culture of integrity and accountability. Ethical leadership is not just about setting policies; it's about embodying the values and principles that define the company's ethical standards, inspiring others to do the same. Leaders within the company have a critical role to play in modeling ethical behavior, promoting a transparent and responsible culture, and ensuring that decisions are made in line with the organization's **core ethical values**.

**Ethical leadership** goes beyond compliance; it involves making decisions that consider long-term impacts, the well-being of all stakeholders, and the alignment with both the **CoE** and **CoC**. Leaders are expected to:

- **Lead by example:** Demonstrating ethical behavior in every action and decision, whether large or small.
- **Promote open dialogue:** Encouraging a culture where ethical concerns can be raised freely, without fear of retaliation, and discussed openly.
- **Support ethical decision-making:** Providing guidance and resources for employees to make ethical decisions, especially in complex situations.
- **Hold themselves and others accountable:** Ensuring that every action aligns with the company's ethical standards, and that any deviations are addressed appropriately.

The importance of ethical leadership cannot be overstated, as it ensures the integrity of our business practices and reinforces the trust of our employees, partners, customers, and the broader community. Leadership's commitment to these values serves as a constant reminder that ethics are central to **OPENERS & CLOSERS'** identity and success.

## OPENERS & CLOSERS' Ethical Commitments (CoE)

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As an industry leader, **OPENERS & CLOSERS** is committed to conducting business with the highest standards of ethical integrity. Our ethical commitments are rooted in a deep respect for:

- **Human Rights:** Ensuring fair labor practices, supporting diversity and inclusion, and maintaining a safe, inclusive work environment.
- **Sustainability:** Actively reducing our environmental footprint through sustainable product design, energy-efficient processes, and a commitment to responsible sourcing.
- **Transparency:** Maintaining open, honest communication with stakeholders and ensuring accountability in all of our business practices.
- **Innovation with Responsibility:** Pioneering new technologies and solutions that enhance customer experiences while adhering to ethical guidelines and sustainability principles.
- **Global Responsibility:** Upholding ethical standards not just within our organization, but across our supply chains and global operations, recognizing our impact on the wider community.

These ethical commitments are the foundation of our corporate identity and define **who we are** as a company. They are integral to building trust with all our stakeholders---employees, customers, partners, shareholders, and the communities in which we operate.

## How to Use the Code in Daily Activities (CoC)

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The **Code of Conduct (CoC)** is designed to be a practical guide for ensuring ethical behavior in every aspect of our daily work. It transforms the values outlined in the **Code of Ethics** into specific, actionable rules that help employees make decisions and behave in ways that reflect the company's ethical commitments. Here's how the CoC should be used on a day-to-day basis:

- **Decision-Making:** Employees should use the CoC as a reference when facing decisions, ensuring that choices are made in line with company values, regulations, and ethical principles. When in doubt, employees are encouraged to refer to the **Ethical Decision-Making Framework** to evaluate options and consider the broader impact of their actions.
- **Interactions with Colleagues and Stakeholders:** The CoC provides clear expectations for respectful, fair, and professional interactions, ensuring that all employees foster a positive work environment and maintain respectful relationships with customers, suppliers, and other stakeholders.
- **Compliance and Reporting:** The CoC outlines procedures for complying with relevant laws and regulations, as well as internal policies. It also establishes guidelines for reporting unethical behavior or any breach of the Code, providing avenues for whistleblowing and ensuring protection against retaliation.
- **Handling Conflicts of Interest:** The CoC gives specific guidance on how to recognize, disclose, and manage conflicts of interest in a way that maintains the company's integrity and reputation.

By integrating the **Code of Conduct** into everyday work practices, employees are empowered to make decisions confidently, knowing that they are contributing to an ethical and responsible company culture. The CoC is not a static document; it evolves as new ethical challenges emerge, and employees are encouraged to view it as a living resource that supports their ongoing commitment to **OPENERS & CLOSERS'** values.

## 1. ETHICAL DECISION-MAKING FRAMEWORK

The **Ethical Decision-Making Framework** is designed to provide guidance for identifying, analyzing, and resolving ethical dilemmas in alignment with the values and principles outlined in **OPENERS & CLOSERS' Code of Ethics (CoE)**. This structured approach ensures that decisions are consistent with our ethical standards, even in complex or ambiguous situations. By following this framework, individuals across the organization can confidently navigate ethical challenges, balancing the needs of the business with the company's commitment to integrity, responsibility, and fairness.

### Identifying Ethical Dilemmas (CoE)

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The first step in the ethical decision-making process is to **recognize when a dilemma exists**. Ethical dilemmas often arise when there is a conflict between competing values, such as loyalty to the company versus fairness to a customer, or when a decision could have negative consequences for one stakeholder group while benefiting another. Common signs that an ethical dilemma may be present include:

- **Conflicting Interests:** When business objectives clash with ethical values, or when personal interests conflict with professional duties.
- **Uncertainty or Ambiguity:** When it's unclear whether a certain action is right or wrong based on existing rules and standards.
- **Pressure to Compromise Values:** When there is internal or external pressure to make decisions that may compromise ethical standards.
- **Potential Harm to Stakeholders:** When a decision could have a negative impact on customers, employees, shareholders, or the community.

Recognizing these situations early is critical. Employees and leaders must stay vigilant, proactively asking themselves if a decision may present an ethical issue. If there is any doubt, it's essential to seek further guidance or consult the **Ethical Decision-Making Framework** to explore the situation in greater depth.

### Gathering Relevant Information (CoE)

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Once an ethical dilemma has been identified, the next step is to **gather all relevant information**. This involves seeking out facts and context that will provide a clearer understanding of the situation and the ethical implications of different courses of action. Key considerations include:

- **Stakeholder Perspectives:** Identifying who will be affected by the decision and understanding their needs, interests, and potential risks.
- **Regulatory and Legal Requirements:** Ensuring that any proposed actions are in compliance with applicable laws, regulations, and internal policies.
- **Company Policies and Ethical Guidelines:** Reviewing how the company's **Code of Ethics** and other policies apply to the situation.
- **Long-Term Consequences:** Considering the potential long-term effects of the decision on the company's reputation, stakeholder relationships, and sustainability goals.

At this stage, employees should also consult relevant internal or external experts to ensure they have a complete and accurate picture of the situation. The goal is to be as informed as possible before proceeding to the next step.

### Evaluating Options (CoE)

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With the necessary information in hand, the next step is to **evaluate the available options** for resolving the dilemma. This involves considering various courses of action and assessing each one based on how well it aligns with the company's ethical principles and long-term goals. To make an informed evaluation:

- **Analyze Each Option:** Examine each potential decision against the company's core values, such as **integrity, respect, and responsibility**.
- **Consider the Impact on Stakeholders:** Assess how each option will affect different stakeholders, including employees, customers, suppliers, and the broader community.
- **Weigh Short-Term Gains vs. Long-Term Consequences:** A decision that may seem beneficial in the short term could have negative long-term consequences for the company's reputation, financial health, or stakeholder relationships.
- **Use Ethical Principles as a Filter:** Apply key ethical principles, such as fairness, transparency, and sustainability, to evaluate the ethical merit of each option.

The evaluation should also consider alternative perspectives and solutions that may not have been initially obvious, ensuring that the final decision is both ethically sound and strategically beneficial.

### Making a Decision (CoE)

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After evaluating the available options, it's time to **make a decision** that is in line with the company's ethical standards. This step requires taking responsibility for the chosen course of action and ensuring that it upholds the integrity and values of **OPENERS & CLOSERS**. Key factors in making a decision include:

- **Choosing the Most Ethical Option:** Select the option that best aligns with the company's core values and ethical commitments, even if it requires a trade-off in short-term gains or expediency.
- **Consulting with Leadership or Ethics Committees:** If the situation is complex or high-stakes, seek input from senior leaders or an ethics committee to ensure that the decision is well-reasoned and supported by the broader organization.
- **Documenting the Decision:** Clearly record the decision-making process, including the reasoning behind the final choice, so that it can be reviewed if necessary and serves as a precedent for similar situations in the future.

The decision should reflect the company's commitment to transparency, fairness, and accountability, ensuring that it is defensible from an ethical perspective both internally and externally.

## Acting on the Decision (CoE)

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Once a decision has been made, it must be **implemented effectively**. This involves taking the necessary steps to ensure that the decision is carried out in a manner consistent with the company's ethical principles and that any potential risks are managed appropriately. Key actions in this phase include:

- **Communicating the Decision Clearly:** Ensure that all relevant stakeholders are informed of the decision and understand the rationale behind it.
- **Executing with Integrity:** Carry out the decision in a way that maintains the company's ethical commitments, ensuring that processes are transparent and that all legal and regulatory requirements are met.
- **Monitoring and Adjusting as Needed:** Keep track of how the decision unfolds and be prepared to make adjustments if unforeseen ethical issues arise.

By taking a proactive and thoughtful approach to implementing ethical decisions, **OPENERS & CLOSERS** ensures that the company's values are consistently upheld in practice.

## Reviewing and Reflecting (CoE)

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After the decision has been implemented, it's essential to take time to **review the outcome** and **reflect on the decision-making process**. This final step is critical for continuous improvement and helps to strengthen the organization's ethical culture. Key questions to ask during this review include:

- **Did the Decision Achieve Its Ethical and Business Objectives?:** Assess whether the chosen solution effectively resolved the ethical dilemma while aligning with the company's values and goals.
- **Were There Unintended Consequences?:** Identify any unforeseen ethical issues or negative impacts that arose as a result of the decision.
- **What Can Be Learned from This Experience?:** Reflect on what went well and what could be improved in future decision-making processes.

By reviewing and reflecting on decisions, **OPENERS & CLOSERS** ensures that the organization continuously learns and adapts its ethical practices, building a stronger foundation for future decision-making.

## Ethical Decision-Making in Business Transactions (CoC)

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While the **Code of Ethics** guides the broader values behind decision-making, the **Code of Conduct** focuses on **practical application in business transactions**. This section outlines how ethical decision-making can be consistently applied in daily business activities, ensuring that all transactions are conducted with integrity, fairness, and respect for stakeholders.

- **Transparent Dealings:** Employees must ensure that all business transactions are transparent, with no hidden agendas, and fully comply with both legal standards and the company's ethical guidelines.
- **Fair Treatment of Partners and Customers:** Whether negotiating contracts, making financial decisions, or engaging with suppliers, employees are expected to treat all business partners fairly, avoiding any form of exploitation or unethical behavior.
- **Conflict of Interest Prevention:** Employees must avoid any conflicts of interest in business dealings, ensuring that decisions are made in the best interest of the company, not for personal gain.
- **Compliance with Regulations:** All business transactions must adhere to applicable laws and regulations, including anti-corruption, anti-bribery, and competition laws.
- **Long-Term Relationship Building:** Ethical decision-making should focus not just on short-term profits but on building long-term, trust-based relationships with customers, partners, and the community.

Through the practical application of ethical decision-making in business transactions, **OPENERS & CLOSERS** strengthens its reputation as a company that values integrity and fairness in all its dealings, contributing to long-term success and sustainability.

### 2. CORE ETHICAL VALUES

The **Core Ethical Values** of **OPENERS & CLOSERS** serve as the foundation of our ethical framework, guiding every decision and action we take as a company. These values are divided into two categories: **Timeless Ethical Values**, which represent fundamental moral principles that are consistently relevant, and **Ethical Values for the Future**, which reflect our commitment to addressing emerging challenges and responsibilities in an evolving global landscape. Together, these values form the bedrock of our ethical culture, ensuring that we remain accountable, trustworthy, and forward-thinking in all our endeavors.

## Timeless Ethical Values (CoE)

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**Timeless Ethical Values** are the enduring principles that have defined ethical behavior for centuries. These values are fundamental to how **OPENERS & CLOSERS** operates, and they reflect our commitment to acting with integrity, respect, and responsibility in all aspects of our business. These values transcend time, ensuring that our decisions and conduct remain rooted in strong moral convictions, regardless of the changing business environment.

- **Integrity:**  
Integrity is the cornerstone of our ethical principles. It involves being honest, transparent, and morally consistent in all that we do. At **OPENERS & CLOSERS**, integrity means doing the right thing, even when no one is watching. It requires accountability, a commitment to ethical behavior, and ensuring that every action reflects our dedication to honesty and fairness. Integrity is not only a personal responsibility but also a corporate one, and it permeates all our interactions, both internally and externally.
- **Respect:**  
Respect is fundamental to fostering a positive and inclusive environment. It means treating everyone---employees, customers, suppliers, and community members---with dignity, fairness, and understanding. At **OPENERS & CLOSERS**, respect is demonstrated by listening to diverse perspectives, valuing others' contributions, and ensuring that every individual is treated equitably. Respect also extends to the environment and the communities in which we operate, ensuring that our actions contribute to the greater good.
- **Responsibility:**  
Responsibility at **OPENERS & CLOSERS** means owning our actions and their consequences. We are committed to being responsible corporate citizens, taking accountability for the impact we have on our employees, customers, stakeholders, and the environment. This value reflects our commitment to ethical business practices, responsible innovation, and sustainability. Responsibility also means upholding the highest standards in safety, quality, and ethical decision-making across all levels of the organization.
- **Fairness:**  
Fairness ensures that all individuals and groups are treated equitably, without favoritism or discrimination. At **OPENERS & CLOSERS**, fairness means making unbiased decisions, promoting equal opportunities, and ensuring that all stakeholders are given a fair chance to succeed. This value is critical to building trust within the organization and with external partners, and it reinforces our commitment to justice in all business dealings.
- **Compassion:**  
Compassion represents our commitment to empathy, kindness, and understanding in our interactions with others. Whether it's caring for the well-being of employees, supporting customers, or engaging with the community, **OPENERS & CLOSERS** places great importance on creating a culture where people feel valued and supported. Compassion drives our approach to social responsibility and guides us in addressing the needs of those who are most vulnerable.
- **Loyalty:**  
Loyalty is about building lasting relationships based on trust and mutual commitment. At **OPENERS & CLOSERS**, loyalty means standing by our employees, customers, partners, and communities, fostering a sense of solidarity and shared purpose. It also entails being loyal to our values, even in the face of challenges, ensuring that we remain true to our ethical commitments in all circumstances.
- **Trustworthiness:**  
Trustworthiness is essential to maintaining the credibility and reliability of **OPENERS & CLOSERS** as a business partner and employer. Being trustworthy means fulfilling our promises, maintaining confidentiality, and acting with honesty at all times. Trust is the foundation of every relationship we build, and it is critical to our long-term success. Trustworthiness ensures that stakeholders have confidence in our ability to act ethically and deliver on our commitments.
- **Courage:**  
Courage at **OPENERS & CLOSERS** involves standing up for what is right, even when it is difficult. Ethical courage means making decisions that align with our core values, even when those decisions may be unpopular or come with significant challenges. Courage also entails innovation---embracing bold ideas and taking calculated risks to push the company forward, while always remaining committed to ethical practices. Courage empowers us to lead with integrity and face ethical dilemmas head-on.

## Ethical Values for the Future (CoE)

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As **OPENERS & CLOSERS** continues to grow and evolve, we recognize the importance of preparing for future ethical challenges. Our **Ethical Values for the Future** reflect our commitment to addressing emerging global trends, including sustainability, technological advancements, and the increasing importance of transparency and inclusion. These values ensure that our company remains agile, adaptable, and responsible in a rapidly changing world.

- **Sustainability:**  
Sustainability is a core priority at **OPENERS & CLOSERS**, reflecting our commitment to minimizing our environmental footprint and creating long-term value for future generations. We strive to develop products and processes that reduce waste, conserve energy, and promote environmental stewardship. Sustainability extends beyond environmental concerns to encompass social and economic sustainability, ensuring that we contribute to a healthier, more equitable future for all.
- **Innovation with Responsibility:**  
As an industry leader, we are committed to fostering innovation that not only advances our business but also contributes positively to society. **Innovation with Responsibility** means developing cutting-edge technologies and solutions that enhance the safety, efficiency, and sustainability of our products, without compromising ethical standards. Responsible innovation ensures that we consider the social, environmental, and ethical implications of new technologies, promoting progress while safeguarding the well-being of all stakeholders.
- **Global Responsibility:**  
In an interconnected world, **OPENERS & CLOSERS** recognizes the importance of operating with a sense of **Global Responsibility**. This value reflects our commitment to ethical practices across our global supply chains, ensuring that we uphold human rights, labor standards, and environmental protections in every region where we operate. Global Responsibility also means contributing to the broader international community, engaging in philanthropic efforts, and addressing global challenges such as poverty, inequality, and climate change.



- **Ethical Leadership:**  
Ethical leadership is about leading by example, ensuring that our leaders at **OPENERS & CLOSERS** embody the company's core values in every decision they make. Ethical leaders are responsible for fostering an ethical culture, promoting transparency, and ensuring that the company's actions align with its ethical commitments. They play a crucial role in inspiring employees, building trust with stakeholders, and ensuring accountability throughout the organization.
- **Digital Ethics** (with a focus on AI, data privacy, and cybersecurity):  
As technology continues to advance, **Digital Ethics** has become a critical component of our ethical framework. At **OPENERS & CLOSERS**, we are committed to the responsible use of digital technologies, ensuring that AI, machine learning, and other emerging technologies are deployed ethically and transparently. This includes protecting user data, ensuring privacy, and safeguarding against cybersecurity threats. **Digital Ethics** also requires that we remain vigilant about the potential social and ethical impacts of technology, ensuring that our innovations serve the greater good.
- **Transparency:**  
Transparency is essential to building trust and fostering accountability. At **OPENERS & CLOSERS**, we are committed to being open and honest in all our communications, whether with employees, customers, shareholders, or the public. Transparency ensures that we provide clear, accurate, and timely information about our business practices, financial performance, and sustainability efforts. It also means being transparent about the challenges we face and the steps we are taking to address them.
- **Adaptability:**  
The ability to adapt is key to thriving in a rapidly changing world. At **OPENERS & CLOSERS**, adaptability means being flexible and open to change, continuously learning from new experiences, and responding effectively to emerging trends and challenges. Whether it's adapting to new market conditions, technological advancements, or evolving ethical expectations, we are committed to remaining agile and innovative while staying true to our core values.
- **Inclusion and Equity:**  
**Inclusion and Equity** are central to our commitment to creating a workplace and a business environment where everyone feels valued and has the opportunity to succeed. At **OPENERS & CLOSERS**, we are dedicated to fostering diversity, promoting equitable opportunities, and ensuring that all individuals, regardless of background, are treated with fairness and respect. This value extends beyond our organization to our relationships with customers, partners, and the broader community, ensuring that our business practices contribute to a more inclusive and equitable world.

These **Core Ethical Values**---both timeless and future-focused---form the ethical foundation of **OPENERS & CLOSERS**, ensuring that our company remains a responsible, trustworthy, and forward-thinking leader in the industry. By living these values every day, we strengthen our commitment to ethical excellence and contribute to a better, more sustainable world for all.

### 3. LEADERSHIP RESPONSIBILITIES IN UPHOLDING ETHICS

The ethical foundation of **OPENERS & CLOSERS** is shaped and sustained by strong leadership. Leaders at every level of the company play a critical role in upholding and reinforcing our ethical principles, creating a culture where integrity, transparency, and accountability are prioritized. The actions and behaviors of our leaders set the tone for the entire organization, influencing how employees engage with the company's ethical standards and ensuring that those standards are maintained in all aspects of business operations.

Leaders are expected not only to comply with the **Code of Ethics (CoE)** and the **Code of Conduct (CoC)** but to actively promote and champion ethical behavior, serving as role models for others. This section outlines the core responsibilities of leadership in fostering an ethical workplace.

## Leading by Example (CoE)

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At **OPENERS & CLOSERS**, ethical leadership begins with **leading by example**. Leaders must embody the company's core ethical values in every decision they make and every action they take. Their behavior should reflect the highest standards of integrity, honesty, and fairness, demonstrating a personal commitment to the company's ethical principles.

- **Modeling Ethical Behavior:** Leaders must demonstrate ethical decision-making in their daily work, ensuring that their actions align with the company's values. Whether interacting with employees, customers, or partners, they should act with transparency and integrity, setting a positive example for others to follow.
- **Addressing Ethical Dilemmas:** Leaders must be proactive in identifying and addressing ethical dilemmas, using the company's **Ethical Decision-Making Framework** to guide their decisions. By openly discussing ethical challenges and how they are resolved, leaders help to normalize ethical behavior as a critical component of business success.
- **Consistency and Integrity:** Leadership integrity requires that actions align with words---what leaders say must be consistent with what they do. This consistency builds trust with employees and external stakeholders, reinforcing the company's reputation as an ethical organization.

When leaders visibly act with integrity and demonstrate ethical behavior, it encourages employees to do the same, creating a workplace where everyone feels responsible for upholding the company's values.

## Promoting an Ethical Culture (CoE)

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An ethical culture is one in which employees are empowered to act ethically, raise concerns, and contribute to a positive work environment. It is the responsibility of leaders to foster this culture within **OPENERS & CLOSERS**.

- **Creating an Inclusive, Values-Driven Environment:** Leaders are responsible for embedding the company's core values into the everyday culture. They must ensure that ethical behavior is recognized, valued, and supported, making it clear that doing the right thing is a non-negotiable part of the company's identity.
- **Incorporating Ethics into Business Practices:** Ethical leadership means integrating ethical considerations into all aspects of the business, from strategic decision-making to operational processes. Leaders must ensure that policies and practices reflect the company's ethical commitments, and they should

encourage employees to view ethics as integral to business success, not just a compliance requirement.

- **Championing Ethical Initiatives:** Leaders must take the lead in driving ethical initiatives, such as sustainability efforts, diversity and inclusion programs, and responsible innovation practices. By actively supporting these initiatives, leaders help to create an environment where ethics are central to the company's long-term goals.

By promoting an ethical culture, leaders at **OPENERS & CLOSERS** help to create a workplace where ethics are valued and rewarded, and where employees are motivated to act with integrity in all that they do.

## Ensuring Accountability (CoE, CoC)

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Accountability is a cornerstone of ethical leadership. Leaders must ensure that all employees, including themselves, are held accountable for their actions and that ethical standards are consistently enforced across the organization.

- **Establishing Clear Expectations:** Leaders must clearly communicate the company's ethical expectations to all employees, ensuring that everyone understands the standards they are required to meet. This includes providing guidance on how to apply the **Code of Ethics (CoE)** and **Code of Conduct (CoC)** in daily activities.
- **Monitoring Ethical Compliance:** Leaders must actively monitor compliance with the company's ethical policies, identifying any gaps or areas for improvement. This includes overseeing adherence to regulatory requirements, internal policies, and ethical guidelines, ensuring that ethical standards are consistently upheld.
- **Taking Action When Necessary:** When ethical breaches occur, leaders must take immediate and appropriate action. This may include investigating the issue, addressing non-compliance, and ensuring that corrective measures are taken. Accountability also means providing consequences for unethical behavior, as well as recognizing and rewarding ethical conduct.

By ensuring accountability, leaders maintain the integrity of **OPENERS & CLOSERS** and protect the company's reputation as an ethical organization. Accountability reinforces the message that ethics are not optional---they are essential to the way the company operates.

## Training and Mentoring for Ethical Leadership (CoE)

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Training and mentoring are essential tools for cultivating a new generation of ethical leaders within **OPENERS & CLOSERS**. Ethical leadership is not an innate skill; it must be learned and nurtured through education, guidance, and support.

- **Providing Ethics Training:** Leaders are responsible for ensuring that employees at all levels receive regular training on the company's ethical standards, decision-making frameworks, and compliance requirements. Ethics training should be practical and relevant, providing employees with the tools they need to navigate complex ethical dilemmas in their day-to-day work.
- **Mentoring Future Leaders:** Experienced leaders should mentor emerging leaders, helping them develop the skills and mindset necessary to lead with integrity. This mentoring should focus on building a strong ethical foundation, teaching future leaders how to balance business goals with ethical considerations, and encouraging them to take personal responsibility for upholding the company's values.
- **Encouraging Continuous Learning:** Ethical leadership is not static---it evolves in response to new challenges and changing business environments. Leaders must promote a culture of continuous learning, encouraging employees to stay informed about emerging ethical issues and best practices. This could include keeping abreast of changes in regulatory requirements, advancements in **Digital Ethics**, or new trends in corporate responsibility.

Through training and mentoring, **OPENERS & CLOSERS** ensures that future leaders are equipped to carry forward the company's ethical commitments and inspire others to do the same.

## Encouraging Open Communication (CoE)

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Open communication is critical for building a culture of trust and transparency within **OPENERS & CLOSERS**. Leaders must foster an environment where employees feel comfortable speaking up about ethical concerns and where issues are addressed openly and constructively.

- **Creating a Safe Environment for Raising Concerns:** Leaders must establish open channels of communication, where employees can raise ethical concerns without fear of retaliation. This includes providing multiple avenues for reporting issues, whether through direct communication with supervisors or through anonymous reporting mechanisms, such as a **whistleblowing policy**.
- **Listening and Responding:** Leaders should actively listen to employees, taking their concerns seriously and responding in a timely and transparent manner. Ethical leadership means not only being open to feedback but also acting on it, ensuring that concerns are addressed and that corrective actions are taken when necessary.
- **Encouraging Ethical Dialogue:** Ethical leaders promote ongoing dialogue about ethics and values, encouraging employees to discuss ethical dilemmas and share their perspectives. This open exchange of ideas helps to build a stronger ethical culture, where employees feel empowered to act with integrity and support each other in making the right decisions.

By encouraging open communication, leaders ensure that ethical issues are identified and addressed promptly, helping to prevent small problems from escalating into larger challenges.

## Recognizing and Rewarding Ethical Behavior (CoE)

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One of the most effective ways to reinforce ethical behavior within **OPENERS & CLOSERS** is to **recognize and reward** those who demonstrate a strong commitment to the company's ethical values.

- **Celebrating Ethical Leadership:** Leaders must actively recognize individuals and teams who exemplify ethical behavior, whether through formal awards, public recognition, or other incentives. By celebrating ethical leadership, the company sends a clear message that ethical behavior is not only expected but valued and rewarded.
- **Incorporating Ethics into Performance Reviews:** Ethical conduct should be a key component of employee performance evaluations, ensuring that individuals are not only assessed on their business achievements but also on their commitment to the company's ethical standards. This integration of ethics into performance management helps to ensure that ethical behavior is consistently prioritized and rewarded.
- **Creating a Culture of Positive Reinforcement:** Leaders must ensure that ethical behavior is reinforced at every level of the organization. This involves providing continuous feedback, offering coaching and support to employees who face ethical dilemmas, and recognizing those who go above and beyond to uphold the company's values.

By recognizing and rewarding ethical behavior, leaders create a positive feedback loop that encourages all employees to prioritize ethics in their decision-making, helping to build a stronger, more ethical organization.

Through these responsibilities---leading by example, promoting an ethical culture, ensuring accountability, providing training and mentoring, encouraging open communication, and recognizing ethical behavior---leaders at **OPENERS & CLOSERS** play a pivotal role in maintaining the company's ethical integrity. Their commitment to ethical leadership ensures that the company's values are not just ideals but are actively practiced and reinforced throughout the organization.

#### 4. COMMITMENT TO STAKEHOLDERS

At **OPENERS & CLOSERS**, we recognize that our success is deeply intertwined with the well-being and trust of our stakeholders. Whether it's our employees, customers, suppliers, shareholders, or the broader community, each stakeholder plays a critical role in shaping our business. Our commitment to them is rooted in our ethical principles and reflected in both the **Code of Ethics (CoE)** and **Code of Conduct (CoC)**. These commitments are more than promises; they are guiding principles that inform how we operate and engage with each of our stakeholders.

### Commitment to Employees (CoE, CoC)

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Employees are the heart of **OPENERS & CLOSERS**, and our commitment to them is central to our ethical framework. We strive to create a supportive, inclusive, and safe work environment where every employee can thrive and contribute meaningfully to the company's success. Our ethical obligations to employees are outlined in both the **Code of Ethics** and **Code of Conduct**, ensuring that we uphold the highest standards of fairness, respect, and responsibility in all interactions.

- **Respect and Dignity:** We are committed to treating every employee with respect and dignity, regardless of their background, role, or tenure. This includes fostering a work environment that values diversity and inclusion, promotes equal opportunities, and ensures that every individual's voice is heard.
- **Fair Compensation and Benefits:** We ensure that employees are fairly compensated for their work, with wages, benefits, and recognition that reflect their contributions and align with industry standards. Our policies on pay equity, transparency, and benefits support this commitment.
- **Health, Safety, and Well-Being:** **OPENERS & CLOSERS** is dedicated to providing a safe and healthy workplace. We adhere to stringent health and safety standards and offer programs that support employees' mental and physical well-being. We are committed to proactively identifying and mitigating workplace risks, ensuring that every employee can work in a safe and supportive environment.
- **Professional Growth and Development:** We support our employees' personal and professional growth by offering opportunities for learning, development, and career advancement. Ethical leadership includes providing employees with the resources and training they need to succeed while encouraging a culture of continuous improvement.
- **Work-Life Balance:** We recognize the importance of work-life balance and are committed to providing flexible work arrangements where possible. We believe that employees perform at their best when they are able to balance their personal and professional responsibilities.

Our commitment to employees ensures that we not only attract but also retain top talent, creating a work environment where everyone feels valued and empowered to contribute to the company's success.

### Commitment to Customers (CoE, CoC)

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Customers are at the core of our business, and **OPENERS & CLOSERS** is committed to building long-term relationships based on trust, transparency, and ethical service. We understand that our success is directly linked to our ability to meet the needs and exceed the expectations of our customers, and we strive to deliver high-quality products and services that reflect our commitment to excellence.

- **Customer-Centric Innovation:** We are dedicated to developing innovative solutions that address the evolving needs of our customers. This includes investing in research and development to create products that are safe, reliable, and sustainable. Our innovation process is guided by ethical considerations, ensuring that we deliver products that not only meet but exceed industry standards.
- **Transparency and Honesty:** We believe in being open and honest with our customers in all communications, from marketing and product information to pricing and service agreements. Transparency builds trust, and we are committed to providing customers with clear, accurate, and timely information about our products and services.
- **Privacy and Data Protection:** **OPENERS & CLOSERS** takes the privacy and security of customer data seriously. We are committed to protecting personal and sensitive information, ensuring compliance with data privacy regulations, and maintaining the highest standards of cybersecurity to safeguard customer data.

- **Responsiveness and Accountability:** We value feedback from our customers and are committed to addressing concerns, complaints, and inquiries in a timely and respectful manner. Our customer service practices reflect our dedication to accountability, ensuring that we continuously improve our products and services based on customer input.
- **Sustainability and Social Responsibility:** We are committed to offering products that are not only innovative but also environmentally responsible. Our sustainable product design and manufacturing practices ensure that we minimize our impact on the environment while delivering high-quality solutions to our customers.

Through our commitment to customers, we ensure that **OPENERS & CLOSERS** remains a trusted partner, delivering value, quality, and ethical service in every interaction.

## Commitment to Suppliers and Partners (CoE, CoC)

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Our suppliers and partners play a crucial role in helping **OPENERS & CLOSERS** deliver high-quality products and services. We are committed to building ethical, transparent, and mutually beneficial relationships with our supply chain partners, ensuring that all parties operate in alignment with our values and ethical standards.

- **Fair and Transparent Dealings:** We engage with our suppliers and partners in a manner that is fair, transparent, and based on mutual respect. We ensure that all agreements are clear, and we uphold our commitments, fostering long-term relationships built on trust.
- **Ethical Sourcing:** We are committed to sourcing materials and products ethically, ensuring that our suppliers adhere to labor rights, environmental sustainability, and ethical business practices. This includes conducting due diligence on our supply chain to ensure compliance with international human rights standards and environmental regulations.
- **Collaboration and Innovation:** We believe that our suppliers and partners are key to driving innovation. We work collaboratively to find new ways to improve our products, enhance sustainability, and optimize operational efficiency, always with an eye toward ethical considerations and responsible growth.
- **Accountability and Compliance:** We hold our suppliers and partners to high ethical standards and expect them to comply with all applicable laws and regulations. We conduct regular assessments to ensure compliance and address any areas of concern swiftly and transparently.

By maintaining strong, ethical relationships with our suppliers and partners, **OPENERS & CLOSERS** ensures that our supply chain reflects the same values of integrity, sustainability, and responsibility that define our business.

## Commitment to Shareholders (CoE)

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As a company dedicated to ethical leadership and responsible business practices, **OPENERS & CLOSERS** is committed to delivering long-term value to our shareholders. We recognize that our shareholders trust us to operate the business with integrity, accountability, and financial prudence, and we are dedicated to meeting and exceeding their expectations.

- **Financial Integrity:** We are committed to maintaining financial transparency, ensuring that all financial reporting is accurate, complete, and compliant with regulatory requirements. Ethical financial practices are at the core of our business operations, and we strive to provide our shareholders with clear and timely information about the company's financial performance.
- **Sustainable Growth:** Our commitment to shareholders includes a focus on sustainable, long-term growth. We are dedicated to making strategic decisions that ensure the company's continued success while considering the broader impact of our operations on society and the environment.
- **Risk Management:** We take a proactive approach to risk management, identifying and mitigating potential risks that could impact the company's financial health or reputation. By managing risks effectively, we protect the interests of our shareholders and ensure the company's resilience in a rapidly changing business environment.
- **Ethical Governance:** **OPENERS & CLOSERS** is committed to maintaining the highest standards of corporate governance, ensuring that our board of directors and leadership team uphold their fiduciary responsibilities with integrity and accountability. This includes adhering to ethical decision-making processes that prioritize the long-term interests of the company and its shareholders.

Through our commitment to ethical governance, transparency, and sustainable growth, we aim to build long-term value for our shareholders, ensuring their continued trust and support.

## Commitment to the Broader Community (CoE, CoC)

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As a responsible corporate citizen, **OPENERS & CLOSERS** is committed to making a positive impact on the broader community. We understand that our actions affect not only our business but also the communities in which we operate, and we take our responsibility to contribute to social and environmental well-being seriously.

- **Corporate Social Responsibility:** We are dedicated to engaging in initiatives that benefit the broader community, including philanthropy, volunteerism, and partnerships with local organizations. Our corporate social responsibility (CSR) programs are designed to address pressing social issues, promote education and skill development, and support community health and well-being.
- **Environmental Stewardship:** As part of our commitment to sustainability, **OPENERS & CLOSERS** actively seeks to reduce our environmental footprint and contribute to a healthier planet. This includes efforts to minimize waste, conserve energy, and reduce greenhouse gas emissions across our operations. We also promote environmental awareness and responsibility in the communities where we operate.

- **Supporting Local Economies:** We are committed to supporting local economies by creating jobs, sourcing from local suppliers, and investing in community development initiatives. By contributing to the economic well-being of the regions in which we do business, we help to foster sustainable growth and prosperity.
- **Advocating for Human Rights: OPENERS & CLOSERS** is committed to upholding human rights across our operations and supply chains. This includes supporting fair labor practices, ensuring safe working conditions, and promoting diversity and inclusion both within our company and in the communities we serve.

Through our commitment to the broader community, we demonstrate our dedication to being a responsible and ethical corporate citizen, contributing to the well-being of society and the environment.

By upholding our commitments to employees, customers, suppliers and partners, shareholders, and the broader community, **OPENERS & CLOSERS** reinforces our core values of integrity, responsibility, and fairness. These commitments guide our business practices, ensuring that we remain a trusted and ethical organization in all our relationships and operations.

## 5. HANDLING CONFLICTS OF INTEREST

Conflicts of interest can arise in any organization and, if not managed properly, can undermine trust, integrity, and decision-making processes. At **OPENERS & CLOSERS**, we are committed to identifying, addressing, and preventing conflicts of interest to maintain the highest ethical standards. A conflict of interest occurs when personal interests or relationships interfere with, or appear to interfere with, the ability to make decisions that are in the best interest of the company, its stakeholders, and the broader community.

The following guidelines on **Handling Conflicts of Interest** are integral to both the **Code of Ethics (CoE)** and the **Code of Conduct (CoC)** and apply to all employees, managers, and leadership within **OPENERS & CLOSERS**. By adhering to these guidelines, we ensure that personal interests never compromise our professional responsibilities or the trust others place in our organization.

### Identifying Conflicts of Interest (CoE, CoC)

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The first and most important step in handling conflicts of interest is the ability to **identify potential or actual conflicts** when they arise. Conflicts of interest can take many forms, and it is essential that employees are trained to recognize them early.

- **Financial Conflicts:** These occur when personal financial interests, such as investments, ownership, or contracts, may benefit an individual at the expense of the company's interests. For example, an employee holding stock in a competitor or supplier presents a conflict that must be addressed.
- **Personal Relationships:** Personal relationships, whether familial or social, can influence decision-making and create a perception of bias. For example, hiring a close relative or awarding contracts to a company owned by a friend could result in a conflict of interest.
- **Gifts and Hospitality:** Receiving or giving gifts, favors, or hospitality can create conflicts of interest, especially when these might influence, or be perceived to influence, business decisions. At **OPENERS & CLOSERS**, we strictly limit and regulate the acceptance of gifts to prevent any undue influence or appearance of favoritism.
- **Outside Employment or Business Interests:** Employees who engage in outside employment, consulting, or who have ownership stakes in other businesses must ensure that these activities do not conflict with their responsibilities to **OPENERS & CLOSERS**.

By actively identifying these and other types of conflicts, employees and managers can take the necessary steps to ensure that decisions remain impartial and in the best interests of the company.

### Disclosing Conflicts (CoE, CoC)

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Once a potential or actual conflict of interest has been identified, it must be **disclosed immediately**. Disclosure is critical in ensuring transparency and accountability, allowing the company to take appropriate actions to manage the situation.

- **Mandatory Disclosure:** Employees are required to disclose any personal, financial, or professional relationships that could result in a conflict of interest. This includes any relationships with suppliers, competitors, or other entities that could compromise objective decision-making.
- **Timing of Disclosure:** Conflicts must be disclosed as soon as they are recognized. Early disclosure enables the company to assess and address the conflict before it impacts business decisions or creates ethical concerns.
- **How to Disclose:** Disclosures should be made through the appropriate channels, as outlined in the company's **Code of Conduct**. This often involves submitting a conflict of interest disclosure form to the human resources department, legal department, or ethics committee. Employees should provide as much detail as possible about the nature of the conflict to ensure a thorough evaluation.

Open and honest disclosure of conflicts is essential to maintaining the integrity of **OPENERS & CLOSERS** and ensuring that all decisions are made in the company's best interest.

### Evaluating the Conflict (CoE)

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After a conflict of interest is disclosed, the next step is to **evaluate the potential impact of the conflict** on the company, its stakeholders, and its operations. This evaluation is typically conducted by an ethics committee, legal department, or designated leadership team.

- **Assessing Materiality:** The evaluation process involves determining whether the conflict is material and has the potential to affect decision-making. Not all conflicts require action, but those that could influence business decisions or harm the company's reputation must be addressed.

- **Determining Risk:** The company assesses the potential risks associated with the conflict. This includes considering whether the conflict could lead to biased decision-making, financial harm to the company, or damage to stakeholder relationships. The evaluation also includes assessing whether the conflict could be perceived as unethical by external parties.
- **Consulting with Key Stakeholders:** In some cases, it may be necessary to consult with key stakeholders, including employees, managers, or external partners, to gather information and ensure a balanced evaluation. The goal is to understand the full scope of the conflict and its potential consequences.

A thorough evaluation is essential to ensure that the company addresses the conflict in a way that upholds its ethical commitments and protects the interests of all parties involved.

## Mitigating or Resolving the Conflict (CoE)

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Once a conflict has been evaluated, appropriate actions must be taken to **mitigate or resolve the conflict**. The resolution should be designed to eliminate or minimize any potential harm to the company and ensure that decisions are made fairly and impartially.

- **Recusal from Decision-Making:** One of the most common ways to manage a conflict of interest is to have the employee in question recuse themselves from the decision-making process. This ensures that the conflict does not influence the outcome of a business decision, such as awarding a contract or hiring a relative.
- **Reassignment of Duties:** In some cases, the employee may need to be reassigned to another project or area of the company to prevent the conflict from affecting their work. This helps to maintain objectivity and ensures that the employee can continue contributing to the company in an ethical manner.
- **Termination of Outside Relationships or Interests:** If the conflict cannot be adequately managed through recusal or reassignment, the company may require the employee to sever outside relationships or business interests that are creating the conflict. This could include divesting financial interests in a supplier or competitor or stepping down from outside employment that conflicts with company responsibilities.
- **Formal Agreements or Waivers:** In cases where the conflict is low-risk, it may be possible to resolve the conflict through a formal agreement or waiver that outlines how the conflict will be managed. This agreement would specify conditions for continued employment or involvement in decision-making, while ensuring transparency and fairness.

Resolving conflicts in a fair and transparent manner is crucial to maintaining trust within the company and with external stakeholders.

## Documenting and Monitoring (CoE)

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After a conflict has been addressed, it is important to **document the resolution** and establish mechanisms for ongoing monitoring. Proper documentation ensures that there is a clear record of how the conflict was handled and provides a basis for future reference.

- **Documentation of the Process:** The company must document the entire process, from the initial disclosure to the resolution. This documentation should include details of the conflict, the steps taken to evaluate and resolve it, and any actions taken to mitigate its impact. This record helps ensure accountability and provides transparency in case of future scrutiny.
- **Monitoring for Compliance:** In cases where ongoing measures are required to manage a conflict (such as continued recusal from certain decisions), the company must establish a monitoring system to ensure compliance. This could involve regular check-ins with the employee's manager or the ethics committee to confirm that the agreed-upon actions are being followed.
- **Reviewing the Effectiveness of the Resolution:** Periodically, the company should review the effectiveness of the conflict resolution to ensure that it continues to prevent ethical concerns. If the conflict evolves or new information arises, the company may need to reassess its approach.

By documenting and monitoring conflicts, **OPENERS & CLOSERS** ensures that its ethical commitments are upheld and that conflicts are managed in a transparent, accountable manner.

## Avoiding Conflicts of Interest (CoC)

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While it is important to address conflicts when they arise, **OPENERS & CLOSERS** also places a strong emphasis on **avoiding conflicts of interest** in the first place. Preventative measures help to reduce the likelihood of conflicts and ensure that employees remain focused on the company's best interests.

- **Education and Training:** Employees are regularly trained on how to recognize, disclose, and manage conflicts of interest. This training is a critical component of the company's ethical program and helps to foster a proactive approach to preventing conflicts.
- **Clear Policies and Guidelines:** The company's **Code of Conduct** includes clear policies and guidelines regarding conflicts of interest. These policies outline the expectations for ethical behavior and provide employees with practical guidance on how to avoid situations that could create conflicts.
- **Encouraging Ethical Decision-Making:** By promoting a culture of ethical decision-making, **OPENERS & CLOSERS** empowers employees to make decisions that align with the company's values. Employees are encouraged to seek guidance from their managers or the ethics committee if they are unsure whether a situation presents a conflict.

Preventing conflicts of interest helps to protect the integrity of **OPENERS & CLOSERS** and ensures that all decisions are made with the company's best interests in mind.

## Personal Conflicts of Interest (CoE)

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In addition to business-related conflicts, **personal conflicts of interest** can also impact an employee's ability to act impartially. These conflicts arise when personal relationships or interests interfere with the employee's professional responsibilities.

- **Family and Close Personal Relationships:** Personal relationships with family members, friends, or romantic partners can create conflicts of interest, particularly when those individuals have business dealings with **OPENERS & CLOSERS**. Employees must disclose these relationships and recuse themselves from any decisions that could be influenced by personal bias.
- **Financial Interests:** Personal financial interests, such as investments in competitors or suppliers, can also create conflicts. Employees must disclose any financial interests that could conflict with the company's interests and take appropriate steps to mitigate or resolve the conflict.
- **Outside Activities:** Employees who engage in outside employment, consulting, or volunteer activities must ensure that these activities do not create conflicts with their professional duties. Any outside activities that could interfere with the employee's responsibilities to **OPENERS & CLOSERS** must be disclosed and addressed.

By managing personal conflicts of interest, **OPENERS & CLOSERS** ensures that employees can perform their duties without bias or undue influence, maintaining the integrity of the company's operations.

Through careful identification, disclosure, evaluation, and resolution of conflicts of interest, **OPENERS & CLOSERS** upholds its commitment to ethical decision-making and ensures that all employees act in the best interests of the company and its stakeholders.

## 6. ETHICAL USE OF RESOURCES AND TECHNOLOGY

In the modern business landscape, responsible use of resources and technology is critical to ensuring that companies like **OPENERS & CLOSERS** operate with integrity, security, and sustainability. This responsibility encompasses everything from protecting intellectual property to using financial resources wisely and ensuring that technological advancements like AI and automation are deployed ethically. As an organization committed to high ethical standards, **OPENERS & CLOSERS** follows strict guidelines for the ethical use of resources and technology, as outlined in both the **Code of Ethics (CoE)** and the **Code of Conduct (CoC)**. These guidelines help ensure that we safeguard our assets, respect the rights of others, and contribute to a sustainable future.

### Protecting Intellectual Property and Confidential Information (CoE, CoC)

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At **OPENERS & CLOSERS**, intellectual property (IP) and confidential information are valuable assets that must be protected to maintain our competitive advantage and uphold our legal and ethical obligations.

- **Safeguarding Intellectual Property:** We are committed to protecting our own intellectual property, which includes patents, trademarks, copyrights, trade secrets, and other proprietary information. This responsibility extends to all employees, who must ensure that our IP is not improperly disclosed, misused, or shared with unauthorized parties.
- **Respecting the IP of Others:** In addition to protecting our own assets, we respect the intellectual property rights of others. This means that we do not engage in activities such as unauthorized copying, distribution, or use of third-party materials. We adhere to all applicable laws and regulations governing intellectual property, ensuring that we respect the creativity and innovation of others.
- **Handling Confidential Information:** Employees at **OPENERS & CLOSERS** are responsible for safeguarding confidential information, both internal and external. This includes trade secrets, business strategies, financial data, and personal information. Confidential information must be stored securely, shared only with authorized individuals, and handled in accordance with company policies and applicable laws. Unauthorized disclosure of confidential information can damage the company's reputation and legal standing, and employees are expected to report any breaches immediately.

By protecting intellectual property and confidential information, we uphold our ethical obligations to our company, employees, customers, and partners.

### Ethical Use of Technology (CoE, CoC)

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Technology is a powerful tool that drives innovation and growth, but it must be used ethically and responsibly. At **OPENERS & CLOSERS**, we are committed to ensuring that all technology deployed within the company adheres to the highest ethical standards. This includes addressing the ethical implications of emerging technologies, such as artificial intelligence (AI) and automation.

- **Incorporating AI and Automation Ethics:** As AI and automation become increasingly central to our business operations, we are committed to using these technologies responsibly. This means ensuring that AI systems are designed and deployed in a manner that is fair, transparent, and respectful of human rights. We avoid biases in AI algorithms, ensure data privacy, and use automation in ways that enhance productivity without compromising job quality or ethical standards.
- **Promoting Transparency and Accountability:** Employees involved in the development or deployment of technology must ensure that these systems are used ethically. This includes providing clear information about how technologies are used, making sure they align with the company's values, and ensuring accountability for any negative impacts. Transparency about the capabilities and limitations of technology is critical to maintaining trust with stakeholders.
- **Innovation with Responsibility:** At **OPENERS & CLOSERS**, innovation is balanced with responsibility. We continuously assess the ethical implications of new technological advancements, ensuring that they are used to benefit society and the environment, rather than solely for profit. Our commitment to responsible innovation guides how we integrate technology into our operations and product development.

By ensuring the ethical use of technology, we protect the integrity of our operations while fostering trust and accountability with our stakeholders.

### Financial Responsibility (CoE, CoC)

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Financial responsibility is fundamental to our operations at **OPENERS & CLOSERS**. Ethical financial practices are critical for maintaining the company's long-term success, protecting shareholder value, and fostering trust with employees, partners, and the public.

- **Transparent Financial Reporting:** We are committed to ensuring that all financial reporting is accurate, timely, and transparent. This includes complying with all applicable laws, regulations, and accounting standards. Employees involved in financial transactions or reporting are expected to act with the highest level of integrity, avoiding any actions that could misrepresent the company's financial position.
- **Prudent Use of Financial Resources:** We use financial resources responsibly and strategically, ensuring that all expenditures are justified and contribute to the company's growth and sustainability. This includes maintaining strict internal controls, preventing waste or fraud, and ensuring that budgets are adhered to.
- **Avoiding Conflicts of Interest in Financial Decisions:** Employees involved in financial decisions must avoid any personal financial interests that could compromise their judgment. This includes ensuring that company funds are used solely for legitimate business purposes and not for personal gain.

By adhering to strict financial responsibility, **OPENERS & CLOSERS** ensures the company's stability and accountability to its shareholders and stakeholders.

## Responsible Sourcing and Environmental Sustainability (CoE, CoC)

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As part of our commitment to sustainability, **OPENERS & CLOSERS** ensures that all resources are sourced ethically and in ways that minimize environmental impact. This commitment is integrated into our supply chain practices, product development, and daily operations.

- **Ethical Sourcing:** We work only with suppliers who adhere to our ethical standards regarding human rights, labor practices, and environmental responsibility. This includes conducting due diligence to ensure that our suppliers comply with all applicable laws and regulations, as well as our internal guidelines for ethical behavior.
- **Sustainable Practices:** Environmental sustainability is a core value at **OPENERS & CLOSERS**. We are committed to reducing our environmental footprint through sustainable resource management, energy efficiency, waste reduction, and the use of renewable materials. Our products are designed with sustainability in mind, and we continually seek to innovate in ways that promote environmental stewardship.
- **Promoting a Circular Economy:** In line with our sustainability goals, we strive to adopt circular economy practices that minimize waste and maximize the reuse and recycling of materials. This not only reduces our environmental impact but also aligns with our long-term vision for responsible growth.

Through responsible sourcing and environmental sustainability, we ensure that **OPENERS & CLOSERS** remains a leader in ethical and sustainable business practices.

## Use of Time and Work Resources (CoE)

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Efficient and ethical use of company time and resources is essential to maintaining productivity, integrity, and accountability within **OPENERS & CLOSERS**.

- **Time Management:** Employees are expected to use their work time responsibly, ensuring that their efforts contribute to the company's success. Personal activities should be minimized during working hours, and company resources, including time, should be dedicated to legitimate business activities.
- **Responsible Use of Company Assets:** Company assets---including office supplies, equipment, and technology---should be used solely for business purposes. Employees must avoid using company resources for personal gain and are expected to take care of the assets entrusted to them. Any misuse of resources undermines the company's ability to operate effectively and ethically.

By using time and work resources responsibly, employees help ensure that **OPENERS & CLOSERS** operates efficiently and ethically, maximizing value for the company and its stakeholders.

## Data Protection and Privacy Compliance (CoC)

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In today's digital world, protecting personal and sensitive information is more important than ever. **OPENERS & CLOSERS** is committed to ensuring that all data, whether it belongs to employees, customers, or partners, is handled responsibly and securely.

- **Compliance with Privacy Regulations:** We comply with all applicable data privacy regulations, including the **General Data Protection Regulation (GDPR)** and other international, national, and regional laws that govern the collection, storage, and use of personal information. Employees involved in handling personal data must ensure that it is processed lawfully, transparently, and securely.
- **Minimizing Data Exposure:** We are committed to collecting only the data necessary for legitimate business purposes and to minimizing its exposure to unauthorized individuals or systems. This includes using encryption, access controls, and other security measures to protect sensitive information from breaches or misuse.
- **Training and Awareness:** Employees receive regular training on data protection practices to ensure they understand their responsibilities and are equipped to protect personal and business data. Any data breaches must be reported immediately, and corrective actions are taken to prevent future incidents.

By safeguarding data and ensuring compliance with privacy regulations, **OPENERS & CLOSERS** protects the trust and privacy of its stakeholders.

## Cybersecurity and Safeguarding Digital Assets (CoC)

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As a modern, technology-driven company, **OPENERS & CLOSERS** recognizes the importance of robust cybersecurity practices to protect its digital assets and ensure business continuity.

- **Cybersecurity Protocols:** We employ strong cybersecurity measures, including firewalls, encryption, and access control systems, to protect the integrity of our IT infrastructure and prevent unauthorized access to sensitive information. These protocols are regularly reviewed and updated to address emerging threats.
- **Employee Vigilance:** All employees are expected to remain vigilant against cybersecurity risks, such as phishing attacks, malware, and data breaches. Regular training ensures that employees can recognize potential threats and take appropriate action to safeguard company systems and data.
- **Incident Response and Recovery:** In the event of a cybersecurity breach, **OPENERS & CLOSERS** has an established incident response plan that ensures rapid containment, investigation, and recovery. This plan minimizes the impact of breaches on the company's operations and ensures compliance with regulatory requirements for breach reporting.

By prioritizing cybersecurity and protecting our digital assets, we maintain the trust of our stakeholders and ensure the resilience of our business in the face of evolving digital threats.

Through our commitment to the **Ethical Use of Resources and Technology**, **OPENERS & CLOSERS** ensures that we operate with integrity, safeguard our assets, and contribute to a sustainable, secure, and responsible future. These principles guide our actions, helping us navigate the challenges of the digital age while maintaining the highest standards of ethics and responsibility.

## 7. RESPECT FOR HUMAN RIGHTS AND DIVERSITY

Respect for human rights and a commitment to diversity are core ethical values at **OPENERS & CLOSERS**. These principles are integral to creating a fair, inclusive, and supportive workplace and to ensuring that our business operations and relationships across the supply chain are conducted in accordance with internationally recognized human rights standards. Through our commitment to human rights and diversity, we strive to uphold ethical standards that ensure equal opportunities, safety, and respect for all, both within and outside the workplace. The following guidelines outline our approach to ensuring that respect for human rights and diversity is embedded in our company's culture, practices, and policies.

### Creating an Inclusive Workplace (CoE, CoC)

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An inclusive workplace is one where every employee feels valued, respected, and empowered to contribute, regardless of their background, identity, or personal circumstances. **OPENERS & CLOSERS** is committed to fostering a diverse and inclusive environment that promotes equity, fairness, and mutual respect.

- **Diversity in Hiring and Promotion:** We are dedicated to ensuring that our hiring, promotion, and compensation practices are free from bias and discrimination. Employees are recruited, evaluated, and promoted based on their skills, qualifications, and contributions, regardless of gender, race, ethnicity, religion, sexual orientation, age, disability, or any other protected characteristic.
- **Inclusive Work Environment:** We promote an environment where all employees feel welcome and included. This involves creating spaces for open dialogue, encouraging collaboration among diverse teams, and supporting employees from all backgrounds. We actively work to eliminate barriers to inclusion and strive to ensure that every voice is heard and valued.
- **Zero Tolerance for Discrimination and Harassment:** Discrimination, harassment, and any form of disrespectful behavior have no place at **OPENERS & CLOSERS**. Our **Code of Conduct** sets clear expectations for appropriate behavior and provides mechanisms for reporting and addressing any violations. We are committed to maintaining a workplace that is safe, respectful, and free from discrimination and harassment.

By creating an inclusive workplace, we foster a culture of belonging that empowers every employee to achieve their full potential and contributes to our overall success as an organization.

### Upholding Human Rights Across the Supply Chain (CoE, CoC)

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As a global company, **OPENERS & CLOSERS** recognizes the importance of upholding human rights not only within our own operations but also across our supply chain. We are committed to ensuring that the products and services we provide are sourced and produced in a manner that respects the rights and dignity of all individuals involved.

- **Ethical Supply Chain Standards:** We require all of our suppliers and partners to adhere to internationally recognized human rights standards, including fair labor practices, the elimination of forced and child labor, and the protection of workers' rights. Our supplier code of conduct ensures that our partners share our commitment to ethical labor practices and environmental responsibility.
- **Human Rights Due Diligence:** **OPENERS & CLOSERS** conducts thorough due diligence to identify, assess, and address potential human rights risks within our supply chain. This includes auditing our suppliers, engaging in stakeholder consultations, and working collaboratively with partners to resolve any issues that arise. Where necessary, we take corrective action to ensure compliance with human rights standards.
- **Supporting Fair Wages and Safe Working Conditions:** We expect all suppliers to provide fair wages, safe working conditions, and the freedom to associate and collectively bargain. We support efforts to improve labor conditions and ensure that the rights of all workers in our supply chain are respected.

By upholding human rights across our supply chain, we ensure that our operations contribute to ethical and responsible business practices on a global scale, protecting the dignity and well-being of workers around the world.

### Supporting Diversity and Inclusion Beyond the Workplace (CoE)

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Our commitment to diversity and inclusion extends beyond the workplace to our broader impact on society. **OPENERS & CLOSERS** recognizes that promoting diversity and inclusion in the communities where we operate contributes to social equity and strengthens our business relationships.

- **Community Engagement:** We actively support initiatives that promote diversity, inclusion, and equality in the communities we serve. This includes partnerships with local organizations, participation in community events, and engagement in philanthropic efforts that advance social equity.
- **Supplier Diversity:** We are committed to working with a diverse range of suppliers, including businesses owned by women, minorities, veterans, and individuals with disabilities. By supporting supplier diversity, we help create economic opportunities for underrepresented groups and foster innovation and creativity in our supply chain.
- **Advocating for Inclusive Policies:** **OPENERS & CLOSERS** advocates for policies that promote diversity and inclusion at both the industry and societal levels. We work alongside other businesses, governments, and non-governmental organizations to support legislation and initiatives that advance human rights, reduce inequality, and promote equal opportunities for all.

By supporting diversity and inclusion beyond our workplace, we strengthen our relationships with communities and contribute to the broader societal goal of creating a more just and inclusive world.

## Ensuring Safety and Well-Being (CoE, CoC)

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The safety and well-being of our employees and partners are paramount at **OPENERS & CLOSERS**. We are committed to providing a work environment that prioritizes the health, safety, and mental well-being of all individuals involved in our operations.

- **Workplace Safety Standards:** We adhere to rigorous health and safety standards to ensure that all employees work in safe and hazard-free environments. This includes compliance with local and international safety regulations, regular safety audits, and continuous improvement of workplace safety practices.
- **Mental Health and Well-Being:** In addition to physical safety, we recognize the importance of mental health and well-being. We provide access to mental health resources, employee assistance programs, and promote a culture of openness where employees feel comfortable discussing mental health concerns. We are committed to fostering a supportive environment that prioritizes the holistic well-being of our employees.
- **Safety Across the Supply Chain:** Our commitment to safety extends to our supply chain partners. We expect all suppliers to adhere to the same high standards of health and safety, ensuring that workers in our supply chain are protected from workplace hazards and have access to safe working conditions.

By ensuring the safety and well-being of all individuals connected to **OPENERS & CLOSERS**, we demonstrate our commitment to creating a work environment where people can thrive and perform at their best.

## Training and Awareness on Human Rights and Diversity (CoE, CoC)

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Continuous education and awareness are essential to promoting respect for human rights and fostering diversity within our organization. **OPENERS & CLOSERS** is committed to providing ongoing training to ensure that all employees understand their responsibilities and the ethical standards we uphold.

- **Diversity and Inclusion Training:** We offer regular training programs that promote awareness of diversity, inclusion, and unconscious bias. These programs help employees understand the value of diverse perspectives, challenge stereotypes, and foster a culture of respect and inclusivity.
- **Human Rights Education:** All employees receive training on human rights, including the importance of respecting workers' rights, eliminating discrimination, and preventing human rights violations within our supply chain. This education ensures that employees are aware of their responsibilities in upholding our human rights commitments.
- **Leadership Development:** We provide targeted training for managers and leaders to equip them with the skills needed to create inclusive teams and support diversity efforts. Ethical leadership is critical to sustaining an inclusive culture, and we are committed to helping our leaders model the behavior we expect from all employees.
- **Monitoring and Improvement:** We continually assess the effectiveness of our training programs and make improvements based on employee feedback and evolving best practices. By staying informed about emerging trends and issues related to human rights and diversity, we ensure that our programs remain relevant and impactful.

Through comprehensive training and awareness initiatives, **OPENERS & CLOSERS** empowers its employees to uphold human rights and champion diversity in all aspects of their work.

By embracing a strong commitment to **Respect for Human Rights and Diversity**, **OPENERS & CLOSERS** ensures that our operations contribute to a fair, safe, and inclusive environment. This commitment reflects our values and strengthens the trust of our employees, customers, partners, and communities. Through our actions, we demonstrate that respect for human dignity and diversity is fundamental to who we are as an organization.

### 8. ENVIRONMENTAL STEWARDSHIP AND SUSTAINABILITY

At **OPENERS & CLOSERS**, environmental stewardship and sustainability are fundamental components of our ethical and operational framework. We recognize that our actions have a significant impact on the environment, and we are committed to reducing that impact through responsible and innovative practices. Our approach to sustainability spans the entire lifecycle of our products and business processes, from design to disposal, and is embedded in both the **Code of Ethics (CoE)** and the **Code of Conduct (CoC)**. This commitment reflects our responsibility to protect the planet for future generations while contributing to a sustainable global economy.

## Reducing Carbon Footprint and Energy Consumption (CoE, CoC)

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As part of our environmental stewardship, **OPENERS & CLOSERS** is committed to minimizing our carbon footprint and reducing energy consumption across all aspects of our operations. This commitment aligns with global efforts to combat climate change and reduce greenhouse gas emissions.

- **Energy Efficiency:** We continuously seek ways to improve energy efficiency within our facilities and operations. This includes optimizing manufacturing processes, reducing energy waste, and adopting energy-efficient technologies such as LED lighting, smart HVAC systems, and renewable energy sources where possible.
- **Renewable Energy Adoption:** We are committed to increasing our use of renewable energy, such as solar and wind power, as part of our broader goal to transition towards a low-carbon future. Our long-term strategy includes setting ambitious targets for renewable energy adoption in our global operations.
- **Carbon Emission Reduction Targets:** **OPENERS & CLOSERS** sets specific carbon reduction targets aligned with the goals of international agreements such as the Paris Agreement. These targets guide our efforts to lower our carbon emissions year over year through more sustainable practices and innovative solutions.

By reducing our carbon footprint and energy consumption, we contribute to the global effort to mitigate climate change and operate as a more sustainable business.

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## Sustainable Product Design and Lifecycle Management (CoE, CoC)

Sustainability begins at the design stage, and **OPENERS & CLOSERS** is committed to developing products that are not only high-performing but also environmentally responsible throughout their entire lifecycle.

- **Eco-Friendly Product Design:** We incorporate sustainability into the design phase by selecting materials and processes that minimize environmental impact. This includes using recycled or responsibly sourced materials, reducing the energy required for manufacturing, and designing products that are durable and long-lasting to reduce the need for replacements.
- **Lifecycle Management:** Our approach to sustainability extends throughout the entire lifecycle of our products, from production to end-of-life disposal. We focus on creating products that are easy to maintain, repair, and recycle, ensuring that their environmental impact is minimized at every stage.
- **Product Innovation:** We continuously innovate to create sustainable solutions that meet the evolving needs of our customers while reducing environmental harm. This includes designing energy-efficient door hardware, using biodegradable materials, and exploring new technologies that lower the overall environmental footprint of our products.

Through sustainable product design and lifecycle management, **OPENERS & CLOSERS** ensures that environmental considerations are integrated into every stage of product development and delivery.

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## Waste Reduction and Recycling (CoE, CoC)

Waste reduction and recycling are critical components of our environmental strategy at **OPENERS & CLOSERS**. We are committed to minimizing waste in all our operations and promoting a circular economy approach that maximizes the reuse and recycling of materials.

- **Waste Reduction Initiatives:** We implement comprehensive waste reduction initiatives at all levels of our business, from manufacturing to office operations. This includes reducing material waste in production, optimizing packaging to minimize excess, and encouraging employees to adopt waste reduction practices in their daily work.
- **Recycling Programs:** **OPENERS & CLOSERS** promotes recycling across all our facilities, ensuring that materials such as metals, plastics, paper, and electronic waste are properly recycled rather than sent to landfills. We partner with certified recycling companies to ensure that waste is processed in an environmentally responsible manner.
- **Zero Waste to Landfill Goals:** We are working towards achieving zero waste to landfill across our operations, setting ambitious targets to eliminate landfill use through improved waste management, recycling, and composting practices.

By reducing waste and promoting recycling, we help conserve natural resources and reduce the environmental impact of our operations.

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## Water Conservation (CoE, CoC)

Water is a precious resource, and **OPENERS & CLOSERS** is committed to conserving water and minimizing our water footprint in all of our operations. Water conservation is a key element of our environmental stewardship, particularly in regions where water scarcity is a growing concern.

- **Efficient Water Use:** We implement water-saving technologies and practices in our facilities to reduce water consumption. This includes using water-efficient fixtures, optimizing water use in manufacturing processes, and reusing water wherever possible.
- **Water Stewardship Programs:** We actively participate in water stewardship programs that aim to protect local water resources and promote sustainable water use. This includes working with suppliers and local communities to ensure that water use is managed responsibly and that water quality is maintained.
- **Minimizing Water Pollution:** We are committed to preventing water pollution by ensuring that wastewater from our operations is treated to meet or exceed regulatory standards before being released into the environment. We work to minimize the use of harmful chemicals and reduce pollutants in wastewater.

By conserving water and protecting local water resources, **OPENERS & CLOSERS** contributes to the global effort to preserve one of the planet's most essential resources.

## Sustainable Supply Chain Management (CoE, CoC)

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At **OPENERS & CLOSERS**, we recognize that our supply chain plays a critical role in our environmental impact. We are committed to ensuring that our suppliers adhere to the same high standards of environmental stewardship and sustainability that we uphold in our own operations.

- **Ethical Sourcing:** We work with suppliers who share our commitment to sustainable practices, including responsible sourcing of raw materials, minimizing environmental impact, and upholding human rights and labor standards. We conduct regular audits and assessments to ensure that our supply chain partners comply with these standards.
- **Reducing Supply Chain Emissions:** We collaborate with suppliers to reduce greenhouse gas emissions throughout the supply chain. This includes encouraging the use of renewable energy, optimizing transportation to reduce fuel consumption, and supporting sustainable manufacturing practices.
- **Supplier Sustainability Programs:** We support suppliers in their efforts to adopt more sustainable practices by providing resources, training, and incentives to improve their environmental performance. This collaborative approach helps ensure that sustainability is embedded throughout our entire supply chain.

By integrating sustainability into our supply chain management, we ensure that our environmental commitments extend beyond our own operations and have a positive impact across our global network.

## Compliance with Environmental Regulations (CoE, CoC)

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Compliance with environmental regulations is fundamental to our commitment to sustainability at **OPENERS & CLOSERS**. We adhere to all applicable local, national, and international environmental laws and regulations to ensure that our operations are both ethical and legal.

- **Regulatory Compliance:** We have systems in place to monitor and ensure compliance with environmental laws and standards in all regions where we operate. This includes staying up to date with new regulations and implementing any necessary changes to meet or exceed regulatory requirements.
- **Environmental Audits and Reporting:** We conduct regular environmental audits of our operations to ensure that we are in compliance with all relevant regulations. We also provide transparent reporting on our environmental performance to stakeholders, demonstrating our commitment to accountability and continuous improvement.
- **Proactive Engagement with Authorities:** In addition to complying with existing regulations, we actively engage with regulatory authorities to stay ahead of changes in environmental law and contribute to the development of more effective environmental policies.

By ensuring compliance with environmental regulations, we protect our business from legal risks and contribute to the broader goal of environmental protection.

## Continuous Improvement in Sustainability (CoE, CoC)

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Sustainability is an ongoing journey, and **OPENERS & CLOSERS** is committed to continuously improving our environmental practices and performance.

- **Innovation in Sustainability:** We invest in research and development to create new technologies, materials, and processes that improve our sustainability. This includes exploring alternative materials, enhancing product durability, and developing energy-efficient manufacturing methods.
- **Setting and Achieving Sustainability Goals:** We set measurable sustainability goals across all aspects of our business, from reducing carbon emissions to increasing the use of renewable energy. These goals are regularly reviewed and updated to reflect new challenges and opportunities.
- **Employee Engagement:** We actively engage our employees in our sustainability efforts by providing training and encouraging participation in sustainability initiatives. By fostering a culture of environmental responsibility, we empower employees to contribute to our sustainability goals in meaningful ways.

Continuous improvement ensures that **OPENERS & CLOSERS** remains at the forefront of sustainable business practices, always striving to do better for the environment and society.

## Circular Economy Practices (CoE, CoC)

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The circular economy is a key focus of our sustainability strategy at **OPENERS & CLOSERS**. We are committed to adopting circular economy practices that prioritize reducing waste, reusing materials, and recycling resources to create a more sustainable, closed-loop system.

- **Design for Circularity:** Our products are designed with the principles of the circular economy in mind. This means creating products that are durable, repairable, and recyclable, reducing the need for new resources and minimizing waste at the end of a product's life.
- **Promoting Reuse and Recycling:** We encourage the reuse and recycling of materials within our own operations and across our supply chain. This includes creating take-back programs for used products and partnering with recycling companies to ensure that materials are properly processed.
- **Circular Business Models:** We explore innovative business models that support the circular economy, such as offering product leasing or maintenance services that extend the life of our products and reduce the need for new production.

By embracing circular economy practices, **OPENERS & CLOSERS** contributes to a more sustainable and resource-efficient global economy.

Through our commitment to **Environmental Stewardship and Sustainability**, **OPENERS & CLOSERS** ensures that we not only meet our current needs but also protect the environment for future generations. Our actions reflect our responsibility to the planet, and we are dedicated to continuously improving our sustainability practices to create a better world.

## 9. TRANSPARENCY AND ACCOUNTABILITY

Transparency and accountability are the pillars of trust at **OPENERS & CLOSERS**. They define how we communicate with our stakeholders, make decisions, and take responsibility for our actions. Through transparency, we ensure that our operations, processes, and decisions are open and honest. Accountability means that we are answerable for our actions and outcomes, whether they are successes or challenges. These principles are fundamental to maintaining the integrity and reputation of our business. Both are embedded in our **Code of Ethics (CoE)** and **Code of Conduct (CoC)**, ensuring that every individual within the company is committed to acting openly, responsibly, and ethically.

### Transparent Communication with Stakeholders (CoE, CoC)

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At **OPENERS & CLOSERS**, we prioritize transparent communication with all of our stakeholders, including employees, customers, suppliers, shareholders, and the broader community. Transparency ensures that stakeholders are kept informed, fosters trust, and allows for open dialogue, ensuring that all voices are heard and considered.

- **Honest and Clear Communication:** We are committed to providing clear, accurate, and honest communication in all of our interactions with stakeholders. Whether we are communicating financial results, business strategies, product developments, or operational changes, we ensure that our messaging is truthful and easy to understand.
- **Open Channels for Feedback:** We actively encourage feedback from all stakeholders and provide multiple channels for communication. This ensures that concerns, questions, and suggestions are heard and addressed in a timely and respectful manner. Transparent communication is a two-way process, and we value the input we receive from our stakeholders.
- **Proactive Disclosures:** We proactively disclose important information to our stakeholders to maintain transparency and accountability. This includes sharing updates on business performance, sustainability initiatives, new product launches, and any challenges we may face. By being open about our operations, we maintain trust and foster stronger relationships with all stakeholders.

Transparent communication helps ensure that **OPENERS & CLOSERS** remains a trusted and responsible organization, maintaining strong relationships with everyone affected by our business.

### Accountability in Leadership and Decision-Making (CoE, CoC)

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Accountability in leadership is essential to upholding the ethical values of **OPENERS & CLOSERS**. Leaders within the company have a duty to model ethical behavior, make sound decisions, and take responsibility for the outcomes of those decisions. This principle applies at all levels, ensuring that leaders are held accountable for their actions and the impact they have on the company, its employees, and its stakeholders.

- **Ethical Leadership:** Leaders are expected to act with integrity, making decisions that align with the company's ethical principles and long-term objectives. Ethical leadership involves taking responsibility for decisions, ensuring that they are made transparently, and considering the broader impact on stakeholders.
- **Clear Decision-Making Processes:** We are committed to implementing clear and structured decision-making processes that are transparent and inclusive. Leaders must explain the rationale behind their decisions, especially those that have a significant impact on the company, its employees, or its partners. This ensures that all stakeholders understand the reasoning behind decisions and can trust that they are made with the company's best interests in mind.
- **Accountability for Results:** Leaders must take responsibility not only for their decisions but also for the outcomes of those decisions. This includes being accountable for both successes and challenges. When mistakes are made, leaders are expected to acknowledge them openly and work towards corrective actions. Accountability also involves recognizing the contributions of employees and partners in achieving the company's goals.

By ensuring accountability in leadership and decision-making, **OPENERS & CLOSERS** fosters a culture of responsibility and ethical integrity.

### Reporting and Transparency in Operations (CoE, CoC)

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Transparency in our operations is a critical aspect of our commitment to accountability at **OPENERS & CLOSERS**. We ensure that our business practices are open and transparent, allowing stakeholders to have a clear understanding of how we operate and make decisions.

- **Operational Reporting:** We provide regular and detailed reports on our business operations, including financial performance, environmental impact, sustainability initiatives, and compliance with regulations. These reports are shared with stakeholders, including shareholders, employees, and regulatory bodies, to ensure full transparency in how the company is run.
- **Financial Transparency:** Our financial reporting is clear, accurate, and in full compliance with legal and regulatory requirements. We are committed to ensuring that all financial disclosures are complete and provide stakeholders with a comprehensive understanding of the company's financial health. This transparency builds trust and supports informed decision-making by investors and shareholders.
- **Operational Audits and Assessments:** We conduct regular audits and assessments of our operations to ensure that we are operating efficiently, ethically, and in line with our commitments. These audits are critical for identifying areas of improvement, ensuring compliance with regulations, and maintaining transparency with stakeholders.

By promoting transparency in operations, **OPENERS & CLOSERS** ensures that stakeholders can trust in the integrity of our business practices.

### Encouraging Employee Accountability (CoC)

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Every employee at **OPENERS & CLOSERS** has a role to play in upholding the company's values and ensuring accountability. We promote a culture where employees are encouraged to take ownership of their work, decisions, and actions, contributing to the overall success and ethical standing of the company.

- **Personal Responsibility:** Employees are expected to take personal responsibility for their work and actions. This includes completing tasks to the best of their ability, meeting deadlines, and adhering to the company's ethical standards. Taking ownership of their roles ensures that each employee contributes meaningfully to the company's goals.
- **Accountability for Ethical Behavior:** Employees are accountable for upholding the ethical values outlined in the company's **Code of Conduct**. This means acting with integrity, respecting colleagues, and ensuring that decisions are made ethically and transparently. If mistakes are made, employees are expected to acknowledge them and take corrective action.
- **Empowerment and Support:** We empower employees to take initiative and make decisions within their areas of responsibility, while also providing the necessary support and resources. This balance ensures that employees can be accountable for their actions while having the tools they need to succeed.

Encouraging employee accountability strengthens the ethical foundation of **OPENERS & CLOSERS** and ensures that every member of the organization plays an active role in upholding the company's values.

## Whistleblowing and Reporting Misconduct (CoC)

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At **OPENERS & CLOSERS**, we are committed to maintaining a safe and transparent environment where employees feel empowered to report misconduct without fear of retaliation. Whistleblowing is an essential component of our commitment to accountability, allowing unethical behavior to be identified and addressed swiftly.

- **Whistleblowing Policy:** We have a formal whistleblowing policy that provides employees with clear guidelines on how to report concerns about unethical behavior, illegal activities, or any violations of company policies. This policy ensures that employees can raise concerns in confidence and without fear of reprisal.
- **Confidential Reporting Mechanisms:** To encourage openness, we provide multiple confidential reporting mechanisms, including anonymous hotlines and secure online reporting platforms. These channels allow employees to report concerns safely and discreetly, ensuring that their identity is protected.
- **Protection from Retaliation:** We have a strict non-retaliation policy that protects whistleblowers from any form of retaliation, including termination, demotion, harassment, or other adverse actions. Employees who report misconduct in good faith are fully protected under this policy, ensuring that they can speak up without fear of negative consequences.
- **Investigating and Addressing Misconduct:** All reports of misconduct are thoroughly investigated by our legal and ethics teams. If a violation is found, appropriate corrective actions are taken, which may include disciplinary measures, process improvements, or policy changes. The results of investigations are shared with relevant stakeholders to ensure transparency and accountability.

Through our whistleblowing and misconduct reporting mechanisms, **OPENERS & CLOSERS** ensures that ethical standards are upheld, and any unethical behavior is promptly addressed.

By committing to **Transparency and Accountability**, **OPENERS & CLOSERS** fosters a culture of openness, responsibility, and trust. These principles ensure that we operate with integrity, communicate honestly with stakeholders, and take full responsibility for our actions and decisions. Through transparent communication, ethical leadership, and robust reporting mechanisms, we maintain the trust of our stakeholders and ensure the long-term success and ethical integrity of our business.

### 10. INTEGRITY IN BUSINESS PRACTICES

Integrity is the foundation of ethical behavior in any organization. At **OPENERS & CLOSERS**, we are committed to maintaining the highest standards of integrity in all of our business practices. This means conducting our operations with honesty, transparency, and fairness, ensuring that every decision we make aligns with our core ethical values. Integrity in business practices encompasses a wide range of areas, from communication to financial management, and it ensures that we act responsibly towards our employees, customers, partners, and the broader community. Our **Code of Conduct (CoC)** outlines the specific expectations for maintaining integrity in our daily business activities, while our **Code of Ethics (CoE)** provides the overarching principles that guide our leadership and compliance efforts.

## Honest and Transparent Communication (CoC)

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At **OPENERS & CLOSERS**, honesty and transparency in communication are essential to building trust with our stakeholders. Whether communicating internally with employees or externally with customers, suppliers, and partners, we are committed to ensuring that all information is accurate, clear, and honest.

- **Clarity in Communication:** We ensure that all communications, whether verbal or written, are presented in a clear and straightforward manner. We avoid ambiguous language and ensure that our messaging is easy to understand, enabling stakeholders to make informed decisions based on truthful and transparent information.
- **Honesty in Marketing and Sales:** In our marketing and sales activities, we commit to providing truthful representations of our products and services. Misleading claims, false advertising, or deceptive practices are strictly prohibited. Our goal is to ensure that customers have an accurate understanding of what they can expect from our products and services.
- **Transparency in Operations:** Transparency is fundamental to how we operate. We communicate openly with employees, customers, and stakeholders about our business practices, performance, and any challenges we face. By fostering open and honest dialogue, we build lasting relationships based on mutual trust.

Honest and transparent communication is the cornerstone of ethical business practices and is essential to maintaining our reputation as a trustworthy organization.

## Zero Tolerance for Corruption and Bribery (CoC)

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Corruption and bribery undermine ethical business practices and distort fair competition. **OPENERS & CLOSERS** has a strict **zero-tolerance policy** when it comes to corruption and bribery, ensuring that all of our business dealings are conducted with integrity and transparency.

- **Prohibition of Bribery:** Employees, partners, and any third parties acting on behalf of **OPENERS & CLOSERS** are strictly prohibited from offering, soliciting, or accepting bribes or any other form of improper payments. This includes both direct and indirect forms of bribery, such as gifts, favors, or kickbacks, intended to influence business decisions.
- **Compliance with European Anti-Corruption Laws:** We strictly adhere to European anti-corruption laws and directives, including but not limited to the EU Anti-Corruption Convention, the UK Bribery Act, and other national regulations. Our employees are required to be fully informed about these laws and to ensure compliance in all business dealings, both within the EU and internationally.
- **Monitoring and Reporting:** To ensure compliance with our zero-tolerance policy, we regularly monitor our business activities and conduct audits where necessary. We also provide channels for employees to report any suspected cases of corruption or bribery, and we protect whistleblowers from retaliation.

By enforcing a zero-tolerance policy for corruption and bribery, **OPENERS & CLOSERS** ensures that our business practices are conducted with the highest level of integrity.

## Fair Competition (CoC)

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**OPENERS & CLOSERS** is committed to promoting fair competition in all of our markets. We believe that fair and ethical competition is essential to fostering innovation, providing value to customers, and supporting a healthy business environment.

- **Compliance with Antitrust Laws:** We comply with all applicable antitrust and competition laws in the regions where we operate. This includes avoiding practices such as price-fixing, market allocation, bid-rigging, or any other conduct that could distort fair competition.
- **Ethical Business Practices:** We engage in business practices that are ethical and transparent, competing based on the quality, value, and innovation of our products and services. We do not engage in deceptive or unfair practices that could harm competitors, customers, or other stakeholders.
- **Respecting Competitors:** While we compete vigorously in the marketplace, we respect the rights of our competitors and do not engage in disparagement, espionage, or any unethical actions intended to undermine their operations.

By promoting fair competition, **OPENERS & CLOSERS** ensures that we contribute to a business environment where innovation and quality are rewarded, and customers benefit from fair market practices.

## Integrity in Financial Practices (CoC)

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Financial integrity is a key component of ethical business practices at **OPENERS & CLOSERS**. We are committed to ensuring that all financial transactions, reporting, and tax practices are conducted with transparency and accuracy.

- **Accurate Financial Reporting:** We maintain rigorous standards for financial reporting, ensuring that all financial statements are accurate, complete, and in compliance with applicable accounting standards and regulations. We provide stakeholders with clear and truthful representations of our financial position, ensuring that they can make informed decisions based on reliable information.
- **Expanding on Transparency in Tax Practices:** At **OPENERS & CLOSERS**, we are committed to maintaining transparency in our tax practices. This includes paying all required taxes in the jurisdictions where we operate, adhering to both the letter and spirit of tax laws. We do not engage in aggressive tax avoidance strategies or use tax havens to evade our obligations. Instead, we seek to contribute our fair share to the communities and countries where we do business.
- **Internal Controls and Audits:** We have robust internal controls and auditing processes in place to ensure that all financial transactions are conducted with integrity. These controls help to prevent fraud, mismanagement, and financial misreporting, ensuring that our financial practices are transparent and ethical.

By maintaining integrity in financial practices, **OPENERS & CLOSERS** protects its financial health and upholds the trust of shareholders, regulators, and other stakeholders.

## Handling Confidential Information with Integrity (CoC)

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At **OPENERS & CLOSERS**, the handling of confidential information is taken seriously. We understand the importance of safeguarding sensitive information, whether it pertains to our employees, customers, or business partners.

- **Protecting Confidentiality:** Employees are required to handle confidential information with care and discretion. This includes trade secrets, proprietary business information, personal data, and any other sensitive information that could harm the company or its stakeholders if disclosed.
- **Preventing Unauthorized Disclosure:** We have strict policies in place to prevent unauthorized access, use, or disclosure of confidential information. Employees are trained to recognize the importance of data security and are expected to take all necessary precautions to protect sensitive information, including using encryption, secure storage, and other protective measures.
- **Compliance with Data Protection Regulations:** We comply with data protection laws, such as the **General Data Protection Regulation (GDPR)**, ensuring that personal data is handled in accordance with legal and ethical standards. This includes obtaining consent for data collection, ensuring data

accuracy, and providing transparency about how data is used.

By handling confidential information with integrity, **OPENERS & CLOSERS** ensures that we protect the privacy and trust of all stakeholders.

## Fair Disciplinary Processes (CoC)

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At **OPENERS & CLOSERS**, we are committed to ensuring that disciplinary processes are conducted fairly, transparently, and in accordance with our ethical principles. When employees fail to meet the company's standards of conduct, we ensure that all disciplinary actions are handled with fairness and respect.

- **Clear Disciplinary Guidelines:** We provide clear guidelines for what constitutes unacceptable behavior and the consequences of such actions. These guidelines are communicated to all employees to ensure that expectations are understood and disciplinary processes are transparent.
- **Impartial Investigations:** When disciplinary issues arise, we conduct impartial investigations to determine the facts of the case. All parties involved are given the opportunity to present their side, and decisions are made based on evidence and fairness.
- **Proportional Responses:** Disciplinary actions are proportional to the severity of the violation. We seek to correct behavior where possible and apply fair consequences that reflect the nature of the misconduct.

By maintaining fair disciplinary processes, **OPENERS & CLOSERS** ensures that all employees are treated with respect and that ethical standards are consistently upheld. [Find our]{.mark} [disciplinary system here (link to the document "disciplinary system" at legal.openers-closers.com)].{.mark}

## Responsibility for Compliance and Ethics Training (Leadership, CoE)

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Leadership plays a key role in ensuring that all employees understand and comply with the company's ethical standards. At **OPENERS & CLOSERS**, we provide comprehensive training programs to educate employees and leadership on their responsibilities related to compliance and ethics.

- **Ongoing Ethics Training:** Employees receive regular training on the **Code of Conduct**, compliance obligations, and ethical decision-making. This training helps employees navigate ethical dilemmas and reinforces the company's commitment to maintaining the highest standards of integrity.
- **Leadership's Role in Promoting Compliance:** Leaders at **OPENERS & CLOSERS** are responsible for promoting compliance and ethical behavior within their teams. This includes leading by example, providing guidance on ethical issues, and ensuring that their teams are fully informed about company policies and compliance requirements.
- **Monitoring and Continuous Improvement:** Leadership is also responsible for monitoring compliance within their departments and identifying areas where additional training or support may be needed. By continuously improving our ethics and compliance programs, we ensure that the entire organization remains aligned with our ethical principles.

Through comprehensive compliance and ethics training, **OPENERS & CLOSERS** ensures that all employees are equipped to act with integrity and make ethical decisions in their daily work.

By committing to **Integrity in Business Practices**, **OPENERS & CLOSERS** ensures that we operate with transparency, fairness, and responsibility in every aspect of our business. From financial reporting to fair competition and the handling of confidential information, we are dedicated to maintaining the highest ethical standards in all that we do. Through leadership and employee accountability, we foster a culture of integrity that strengthens our relationships with stakeholders and ensures the long-term success of our business.

### 11. HEALTH AND SAFETY

At **OPENERS & CLOSERS**, the health and safety of our employees, partners, and communities are of paramount importance. We are committed to creating and maintaining a safe and healthy work environment that protects all individuals involved in our operations. Health and safety are integral parts of our **Code of Conduct (CoC)**, and we take proactive measures to ensure compliance with all relevant regulations, while also promoting a culture of well-being that extends beyond physical safety to include mental and emotional health. Our commitment to health and safety also extends to our supply chain, ensuring that our partners uphold the same rigorous standards.

## Creating a Safe Work Environment (CoC)

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A safe work environment is essential for the well-being of all employees and is a priority at **OPENERS & CLOSERS**. We are dedicated to identifying and mitigating any hazards that may pose a risk to the health and safety of our workforce.

- **Hazard Identification and Control:** We regularly assess our workplaces for potential hazards and implement safety measures to prevent accidents and injuries. This includes ensuring that equipment is well-maintained, workspaces are organized, and safety protocols are in place for hazardous tasks.
- **Safety Culture:** We promote a culture of safety where every employee feels responsible for contributing to a safe work environment. Employees are encouraged to report any unsafe conditions or potential hazards, and management is committed to addressing these issues promptly.
- **Protective Equipment and Resources:** Employees are provided with the necessary protective equipment, tools, and resources to carry out their duties safely. This includes personal protective equipment (PPE), safety gear, and ergonomic workstations where needed.

By creating a safe work environment, **OPENERS & CLOSERS** ensures that employees can perform their tasks without risk to their health and safety, fostering a productive and secure workplace.

## Health and Safety Training (CoC)

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Education and training are critical to ensuring that all employees understand their responsibilities when it comes to health and safety. At **OPENERS & CLOSERS**, we provide comprehensive training programs to equip employees with the knowledge and skills they need to work safely and protect themselves and their colleagues.

- **Regular Safety Training:** All employees receive regular training on workplace safety procedures, emergency response protocols, and the proper use of equipment. This training is tailored to the specific needs of each department, ensuring that employees understand the risks associated with their roles and how to mitigate them.
- **Emergency Preparedness:** Employees are trained in emergency preparedness, including how to respond to incidents such as fires, medical emergencies, and natural disasters. Evacuation procedures and first aid training are included to ensure that employees are ready to act in the event of an emergency.
- **Specialized Training:** For roles that involve higher risks, such as working with heavy machinery or hazardous materials, employees receive specialized training to ensure they can carry out their tasks safely. This training is updated regularly to reflect new regulations and best practices.

Through ongoing health and safety training, **OPENERS & CLOSERS** ensures that employees are equipped to recognize risks, prevent accidents, and respond effectively to emergencies.

## Proactive Risk Management (CoC)

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Proactively identifying and managing risks is essential to maintaining a safe workplace. **OPENERS & CLOSERS** takes a proactive approach to risk management, seeking to prevent accidents and injuries before they occur.

- **Risk Assessments:** We conduct regular risk assessments to identify potential hazards and assess the likelihood of accidents or injuries. These assessments are carried out by trained safety officers and are updated regularly to account for new risks or changes in the work environment.
- **Preventive Measures:** Based on risk assessments, we implement preventive measures to eliminate or minimize identified hazards. This includes modifying work processes, improving facility layouts, and enhancing protective equipment to reduce the risk of injury.
- **Incident Reporting and Analysis:** When incidents or near misses occur, we conduct thorough investigations to understand the root causes and implement corrective actions. This helps prevent similar incidents from occurring in the future and improves our overall safety practices.

By adopting a proactive approach to risk management, **OPENERS & CLOSERS** ensures that potential hazards are addressed before they can lead to accidents, creating a safer workplace for all.

## Promoting Mental Health and Well-Being (CoC)

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In addition to physical safety, **OPENERS & CLOSERS** is committed to promoting the mental health and well-being of all employees. We recognize that a healthy workforce is not only physically safe but also mentally resilient, and we provide resources and support to foster a positive and supportive work environment.

- **Mental Health Resources:** We offer access to mental health resources, including employee assistance programs (EAPs), counseling services, and stress management tools. Employees are encouraged to seek support when needed, and we ensure that these resources are confidential and easily accessible.
- **Work-Life Balance:** **OPENERS & CLOSERS** promotes a healthy work-life balance by offering flexible work arrangements, paid time off, and programs that support employees in managing both their professional and personal responsibilities. We recognize that maintaining a balance between work and life is essential for mental well-being.
- **Reducing Workplace Stress:** We actively work to reduce workplace stress by promoting a supportive, inclusive, and collaborative work environment. Managers are trained to identify signs of stress or burnout and are encouraged to have open conversations with employees about their well-being.

By prioritizing mental health and well-being, **OPENERS & CLOSERS** creates a workplace where employees feel valued, supported, and able to perform at their best.

## Compliance with Health and Safety Regulations (CoC)

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At **OPENERS & CLOSERS**, compliance with health and safety regulations is non-negotiable. We ensure that all of our operations meet or exceed the requirements set forth by local, national, and international health and safety laws.

- **Regulatory Compliance:** We are committed to complying with all applicable health and safety regulations, including those related to workplace safety standards, hazardous materials handling, and occupational health guidelines. We regularly review and update our practices to ensure that we remain in compliance with evolving regulations.
- **Internal Audits:** We conduct regular internal audits to assess compliance with health and safety regulations. These audits are carried out by qualified safety professionals who review our practices, identify any gaps, and recommend improvements.
- **Third-Party Inspections:** In addition to internal audits, we engage third-party inspectors to evaluate our compliance with health and safety regulations. These inspections provide an objective assessment of our practices and help ensure that we are meeting the highest standards of safety.

By maintaining strict compliance with health and safety regulations, **OPENERS & CLOSERS** demonstrates its commitment to protecting employees and operating responsibly within the regulatory framework.

## Health and Safety in the Supply Chain (CoC)

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Our commitment to health and safety extends beyond our own operations to our supply chain partners. We expect our suppliers and contractors to uphold the same high standards of health and safety that we maintain at **OPENERS & CLOSERS**.

- **Supplier Health and Safety Standards:** We require all of our suppliers to comply with local and international health and safety regulations and to implement robust safety practices within their operations. This includes providing safe working conditions, proper training, and protective equipment for their employees.
- **Supply Chain Audits:** We conduct regular audits of our suppliers to ensure that they are meeting our health and safety standards. These audits are part of our broader supplier assessment program, which evaluates environmental, social, and governance (ESG) factors, including health and safety.
- **Collaborating for Improvement:** We work collaboratively with our suppliers to help them improve their health and safety practices. This includes providing guidance, training, and support to ensure that our supply chain partners can meet the high standards we set for safety and well-being.

By ensuring health and safety in our supply chain, **OPENERS & CLOSERS** protects not only our own employees but also the workers of our partners, ensuring a safe and ethical supply chain.

Through our commitment to **Health and Safety**, **OPENERS & CLOSERS** ensures that all employees and partners are protected, valued, and supported. By creating a safe work environment, providing comprehensive training, promoting mental well-being, and ensuring compliance with regulations, we foster a culture of safety that enhances productivity, trust, and employee satisfaction. This commitment extends across our operations and supply chain, making health and safety a cornerstone of our ethical business practices.

### 12. PROTECTION OF COMPANY ASSETS AND CONFIDENTIAL INFORMATION

Protecting company assets and confidential information is a vital responsibility at **OPENERS & CLOSERS**. These assets include physical property, financial resources, intellectual property, and digital systems, all of which are essential to the company's success and reputation. By safeguarding these assets, we ensure the integrity of our operations, maintain our competitive advantage, and protect the trust placed in us by our stakeholders. Both the **Code of Conduct (CoC)** and **Code of Ethics (CoE)** guide our approach to the responsible use and protection of company assets and information, ensuring that all employees uphold their responsibility in these areas.

## Proper Use of Physical and Financial Assets (CoC)

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At **OPENERS & CLOSERS**, employees are entrusted with the company's physical and financial assets, which must be used responsibly and exclusively for legitimate business purposes. Protecting these assets helps ensure the smooth functioning of the company and the achievement of our strategic goals.

- **Physical Assets:** All employees are responsible for the proper use, care, and maintenance of physical assets such as equipment, machinery, tools, office supplies, and vehicles. Misuse, neglect, or unauthorized personal use of company property is strictly prohibited. Employees are expected to report any damage, theft, or misuse of assets immediately.
- **Financial Assets:** Financial resources, including company funds, credit cards, and accounts, must be used solely for legitimate business activities and in accordance with company policies. Employees must ensure that expenditures are justified and recorded accurately, and that financial transactions are conducted transparently. Misappropriation or misuse of company funds is a violation of our ethical principles and legal obligations.

By ensuring the responsible use of physical and financial assets, **OPENERS & CLOSERS** protects its resources and reinforces a culture of accountability and integrity.

## Protecting Intellectual Property and Trade Secrets (CoC)

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**OPENERS & CLOSERS** is built on innovation, and our intellectual property (IP) and trade secrets are among our most valuable assets. Safeguarding these assets is essential to maintaining our competitive edge and ensuring the long-term success of the company.

- **Intellectual Property Protection:** Employees must take all necessary precautions to protect the company's IP, including patents, trademarks, copyrights, and proprietary information. Unauthorized disclosure or use of intellectual property is strictly prohibited, and employees are expected to follow all company policies regarding the handling and sharing of IP-related materials.
- **Trade Secrets:** Trade secrets, including confidential business strategies, product designs, and research and development (R&D) initiatives, must be kept secure. Employees must ensure that this information is only shared with authorized individuals, both within and outside the company, and must take precautions to prevent its unauthorized disclosure.
- **Respecting Others' IP:** Just as we protect our own intellectual property, **OPENERS & CLOSERS** respects the IP rights of others. We do not engage in practices that infringe on third-party intellectual property, and we ensure that all employees are aware of their responsibilities in this area.

By protecting intellectual property and trade secrets, **OPENERS & CLOSERS** safeguards its innovative capabilities and maintains its leadership position in the industry.

## Safeguarding Digital Assets and IT Systems (CoC)

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As a technology-driven company, **OPENERS & CLOSERS** relies heavily on digital assets and IT systems to operate efficiently and securely. Safeguarding these digital resources is critical to protecting the integrity of our business and ensuring that we remain resilient against cyber threats.

- **Cybersecurity Best Practices:** Employees are expected to follow all company cybersecurity policies and procedures, including using strong passwords, avoiding phishing schemes, and regularly updating software. These practices help protect the company's IT systems from unauthorized access, malware, and other cybersecurity threats.
- **Access Control:** Access to digital assets, such as databases, networks, and systems, is restricted to authorized personnel only. Employees must not share their login credentials with others and must take precautions to prevent unauthorized access to sensitive data and systems.
- **Data Encryption and Secure Storage:** Sensitive data, including confidential business information and personal data, must be encrypted and stored securely. Employees must ensure that data is handled in compliance with the company's data protection policies and applicable regulations.
- **Incident Reporting:** Employees are required to report any suspicious activities, potential security breaches, or vulnerabilities in the company's IT systems immediately. Prompt reporting allows the company to take swift action to mitigate risks and prevent further damage.

By safeguarding digital assets and IT systems, **OPENERS & CLOSERS** ensures the security and continuity of its operations in an increasingly digital world.

## Protecting Confidential Information (CoC)

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Confidential information is a critical asset for **OPENERS & CLOSERS**, and protecting this information is essential to maintaining the trust of our stakeholders, including employees, customers, and partners. Confidential information includes trade secrets, personal data, financial records, and other sensitive information that, if disclosed, could harm the company or its stakeholders.

- **Confidentiality Obligations:** Employees are required to protect confidential information from unauthorized access, use, or disclosure. This includes both company-owned information and any confidential information provided by customers, suppliers, or other third parties. Employees must ensure that confidential documents are stored securely and that electronic data is encrypted and accessed only by authorized personnel.
- **Restricted Access:** Confidential information should be shared only with individuals who have a legitimate need to know and who are authorized to access it. Employees must take care to prevent inadvertent disclosures, such as discussing confidential matters in public places or leaving sensitive documents unsecured.
- **Handling Personal Data:** **OPENERS & CLOSERS** complies with data protection regulations, including the **General Data Protection Regulation (GDPR)**, and ensures that personal data is collected, processed, and stored in a lawful and ethical manner. Employees must handle personal data with care, ensuring that it is used only for legitimate business purposes and that individuals' privacy rights are respected.

By protecting confidential information, **OPENERS & CLOSERS** maintains its ethical and legal responsibilities while safeguarding the trust of its stakeholders.

## Reporting and Addressing Security Breaches (CoC)

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In the event of a security breach or unauthorized disclosure of confidential information, prompt action is required to mitigate the damage and protect the company's assets and stakeholders. **OPENERS & CLOSERS** has clear protocols for reporting and addressing security breaches to ensure that risks are minimized and lessons are learned.

- **Immediate Reporting:** Employees are required to report any security breaches or incidents of unauthorized access to company assets, confidential information, or IT systems immediately. Reports should be made to the appropriate department, such as IT security or legal, to ensure that the incident is investigated promptly.
- **Incident Response:** **OPENERS & CLOSERS** has a comprehensive incident response plan that outlines the steps to be taken in the event of a security breach. This includes identifying the source of the breach, containing the threat, and implementing corrective actions to prevent future incidents. Employees must cooperate fully with incident response teams to ensure that the breach is addressed effectively.
- **Communication and Remediation:** In the event that a security breach affects customers, partners, or other stakeholders, **OPENERS & CLOSERS** is committed to communicating transparently and taking appropriate steps to remedy the situation. This may include notifying affected individuals, offering support services, and implementing stronger security measures to prevent recurrence.

By reporting and addressing security breaches in a timely and responsible manner, **OPENERS & CLOSERS** ensures the continued security and integrity of its operations and maintains the trust of its stakeholders.

Through our commitment to the **Protection of Company Assets and Confidential Information**, **OPENERS & CLOSERS** ensures that its valuable resources are safeguarded, used responsibly, and protected against potential threats. By maintaining rigorous standards for the use of physical, financial, intellectual, and digital assets, as well as ensuring the confidentiality of sensitive information, we protect the company's competitive position, uphold ethical standards, and maintain the trust of employees, customers, and partners.

### 13. ANTI-CORRUPTION AND ANTI-BRIBERY

At **OPENERS & CLOSERS**, we are fully committed to conducting our business with the highest standards of integrity, and we enforce a strict zero-tolerance policy regarding corruption and bribery. Corruption undermines trust, distorts markets, and damages both businesses and societies. Our commitment to anti-corruption and anti-bribery practices applies not only to our internal operations but also extends to our partners, suppliers, and stakeholders across the supply chain. Through adherence to the **Code of Conduct (CoC)** and compliance with international laws, we ensure that all business activities are conducted transparently, ethically, and in full compliance with the law.

## Zero Tolerance for Bribery (CoC)

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Bribery is one of the most damaging forms of corruption, and **OPENERS & CLOSERS** maintains a strict **zero-tolerance policy** regarding any form of bribery. Bribery, which includes offering, giving, receiving, or soliciting anything of value to influence the actions of another party in a business or governmental decision, is strictly prohibited.

- **Prohibition of Bribery:** All employees, partners, and third-party agents of **OPENERS & CLOSERS** are prohibited from offering or accepting bribes, kickbacks, or any form of improper payments. This includes not only direct monetary bribes but also non-monetary incentives such as gifts, favors, or entertainment that are intended to influence decision-making.
- **No Exceptions:** There are no exceptions to this policy, regardless of local customs or business practices. Employees and partners are expected to act with integrity in all dealings and to avoid any activity that could be perceived as corrupt or unethical.
- **Facilitation Payments:** Small payments made to expedite routine government actions, known as facilitation payments, are also strictly prohibited by **OPENERS & CLOSERS**. We do not condone the use of such payments, even if they are considered common practice in some regions.

By enforcing zero tolerance for bribery, **OPENERS & CLOSERS** ensures that its business decisions are made based on merit and integrity, rather than undue influence or improper incentives. [Find our **Anti-Corruption Policy** here (link to the document "disciplinary system" at [legal.openers-closers.com](https://legal.openers-closers.com))].{.mark}

## Preventing Corruption in All Forms (CoC)

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**OPENERS & CLOSERS** is committed to preventing corruption in all forms, including bribery, extortion, fraud, and other illicit activities that could compromise the integrity of our operations. We believe that preventing corruption is essential to maintaining ethical business practices and fostering trust with our stakeholders.

- **Education and Training:** All employees receive regular training on the company's anti-corruption and anti-bribery policies. This training helps employees recognize potential risks, understand their responsibilities, and make informed decisions that align with the company's ethical values.
- **Third-Party Due Diligence:** We conduct thorough due diligence on all third-party agents, suppliers, and partners to ensure that they share our commitment to anti-corruption. This includes vetting potential partners to identify any red flags or past involvement in corrupt practices.
- **Monitoring and Auditing:** **OPENERS & CLOSERS** regularly monitors its business activities to detect any potential risks of corruption. This includes conducting internal audits and compliance reviews to ensure that employees and partners are adhering to our anti-corruption policies.

By preventing corruption in all its forms, **OPENERS & CLOSERS** protects its reputation and ensures that its business operations are conducted ethically and responsibly.

## Compliance with International Anti-Corruption Laws (CoC)

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As a global company, **OPENERS & CLOSERS** is subject to a range of international anti-corruption laws, including but not limited to the **UK Bribery Act**, the **European Union's anti-corruption directives**, and other national and international regulations. Compliance with these laws is essential to our dedication to maintaining ethical business practices.

- **Adherence to Global Standards:** We are committed to complying with all applicable international anti-corruption laws and regulations, regardless of where we operate. This includes ensuring that all employees, agents, and partners are familiar with these laws and are trained to avoid any activities that could lead to violations.
- **Bribery of Public Officials:** Bribing public officials, whether through direct payments or other forms of influence, is a serious violation of both international law and **OPENERS & CLOSERS'** policies. Employees and partners are strictly prohibited from offering anything of value to public officials in exchange for favorable treatment or to influence governmental decisions.
- **Global Reporting Requirements:** We adhere to the reporting requirements set forth by international anti-corruption laws, ensuring full transparency in our business activities. Any violations of anti-corruption laws are reported to the relevant authorities, and we cooperate fully with investigations.

By complying with international anti-corruption laws, **OPENERS & CLOSERS** ensures that its global operations are aligned with the highest standards of ethical conduct and legal compliance.

## Transparency in Business Transactions (CoC)

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Transparency is essential to preventing corruption and ensuring that business transactions are conducted fairly and ethically. At **OPENERS & CLOSERS**, we are committed to maintaining full transparency in all of our business dealings, ensuring that all stakeholders are fully informed about our operations.

- **Accurate Record-Keeping:** We maintain accurate and detailed records of all business transactions, ensuring that financial and operational activities are fully documented and can be audited. This transparency helps to prevent any fraudulent or unethical behavior and ensures accountability across the company.
- **Clear Contract Terms:** All contracts and agreements with customers, suppliers, and partners are drafted with clear and transparent terms. This ensures that all parties understand their obligations and that there is no room for ambiguity or hidden clauses that could lead to unethical behavior.
- **Open Communication with Stakeholders:** We are committed to open and honest communication with our stakeholders, including employees, customers, shareholders, and regulatory bodies. Transparency in our communications ensures that stakeholders can trust in the integrity of our operations and feel confident in the company's ethical standards.

Through transparency in business transactions, **OPENERS & CLOSERS** fosters a culture of openness and accountability, reducing the risk of corruption and building trust with stakeholders.

## Encouraging Ethical Behavior Across the Supply Chain (CoC)

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Our commitment to anti-corruption and anti-bribery extends beyond our own operations to include our supply chain. We expect all suppliers, contractors, and partners to uphold the same high standards of ethical conduct that we maintain at **OPENERS & CLOSERS**.

- **Supplier Code of Conduct:** We require all suppliers to adhere to our **Supplier Code of Conduct**, which includes strict provisions on anti-corruption and anti-bribery. Suppliers must agree to avoid engaging in any form of corruption, bribery, or unethical behavior as part of their contractual obligations.
- **Supply Chain Audits:** We conduct regular audits of our supply chain partners to ensure compliance with our anti-corruption standards. These audits include reviews of financial transactions, business practices, and adherence to international anti-corruption laws.
- **Capacity Building and Support:** We work with our suppliers to help them strengthen their own anti-corruption practices. This includes providing training, resources, and support to ensure that they can meet the high ethical standards required by **OPENERS & CLOSERS**.

By encouraging ethical behavior across the supply chain, **OPENERS & CLOSERS** ensures that our entire network operates with integrity and accountability, minimizing the risk of corruption at every stage of our business operations.

## Reporting Corruption and Whistleblower Protections (CoC)

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At **OPENERS & CLOSERS**, we are committed to creating a culture where employees feel empowered to report any suspected cases of corruption or unethical behavior without fear of retaliation. Our whistleblowing policy provides clear guidelines for reporting concerns and ensures that whistleblowers are protected from any adverse consequences.

- **Confidential Reporting Channels:** Employees are encouraged to report any concerns related to corruption, bribery, or other unethical behavior through confidential reporting channels. This includes anonymous hotlines and secure online reporting systems that protect the identity of the whistleblower.
- **Whistleblower Protections:** **OPENERS & CLOSERS** has a strict **non-retaliation policy** that protects whistleblowers from any form of retaliation, including dismissal, demotion, or harassment. Employees who report concerns in good faith are fully protected, and any form of retaliation against whistleblowers will result in disciplinary action.
- **Thorough Investigations:** All reports of suspected corruption are thoroughly investigated by the company's legal and compliance teams. We take every report seriously and ensure that appropriate actions are taken to address any violations of our anti-corruption policies.
- **Corrective Actions and Accountability:** If corruption is found, **OPENERS & CLOSERS** takes immediate corrective actions, which may include terminating contracts, disciplining or dismissing employees, or cooperating with law enforcement authorities to address the violation.

By promoting a safe environment for reporting corruption and ensuring whistleblower protections, **OPENERS & CLOSERS** reinforces its commitment to transparency, accountability, and ethical business practices.

Through our comprehensive **Anti-Corruption and Anti-Bribery** policies, **OPENERS & CLOSERS** ensures that all business activities are conducted with the utmost integrity. By enforcing zero tolerance for bribery, preventing corruption in all forms, complying with international laws, promoting transparency, and encouraging ethical behavior across the supply chain, we protect the company's reputation and uphold the trust of our stakeholders.

### 14. COMMITMENT TO INNOVATION WITH RESPONSIBILITY

At **OPENERS & CLOSERS**, innovation is central to our mission of delivering cutting-edge solutions that improve access, security, and sustainability. However, we believe that innovation must always be pursued with responsibility, ensuring that new technologies and processes contribute positively to society, the environment, and our stakeholders. Our commitment to **Innovation with Responsibility** is embedded in both the **Code of Ethics (CoE)** and **Code of Conduct (CoC)**, guiding how we develop, implement, and manage innovation across all areas of our business. This approach ensures that our innovations are not only successful but also ethical, sustainable, and beneficial for the long-term future.

## Ethical Use of Technology (CoE, CoC)

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As a technology-driven company, **OPENERS & CLOSERS** is committed to using technology in ways that are ethical, transparent, and respectful of human rights. We recognize that technological advancements can bring both opportunities and risks, and we strive to ensure that all technologies we develop or adopt are used responsibly.

- **Transparent Implementation:** We prioritize transparency in the deployment of new technologies, ensuring that stakeholders understand how technologies are used and how they may impact their work or lives. Clear communication about the benefits, limitations, and risks of technology is essential for building trust.
- **Human-Centric Approach:** Our approach to technology is human-centered, meaning that we always consider the impact of technology on people---both employees and customers. We avoid technologies that may infringe on privacy, create inequality, or harm well-being, and we commit to using technology to empower and benefit all stakeholders.
- **Compliance with Ethical Standards:** All technology projects are reviewed to ensure compliance with ethical standards and regulations. This includes data privacy laws, environmental regulations, and standards for responsible business conduct.

By ensuring the ethical use of technology, **OPENERS & CLOSERS** promotes innovation that is not only cutting-edge but also aligned with the highest ethical standards.

## Sustainable Innovation (CoE, CoC)

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Sustainability is at the core of our innovation strategy. **OPENERS & CLOSERS** is committed to developing innovative products and solutions that contribute to a sustainable future by minimizing environmental impact and promoting responsible use of resources.

- **Eco-Friendly Product Development:** We integrate sustainability principles into the design and development of our products, ensuring that they are energy-efficient, durable, and made from sustainable materials. This commitment extends to reducing the environmental footprint of our manufacturing processes and supply chain.
- **Circular Economy:** We strive to incorporate circular economy principles into our innovation processes, designing products that are easy to recycle, repair, or reuse. This approach helps reduce waste and promotes a closed-loop system where materials and resources are continuously reused.
- **Innovating for Environmental Impact:** Our research and development efforts focus on creating solutions that address environmental challenges, such as reducing energy consumption, lowering carbon emissions, and conserving natural resources. We aim to lead the industry in sustainable innovation, delivering products that help our customers achieve their own sustainability goals.

Through sustainable innovation, **OPENERS & CLOSERS** ensures that technological advancements are aligned with our commitment to protecting the environment and promoting a greener future.

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## Continuous Improvement and Adaptability (CoE, CoC)

In a rapidly changing world, continuous improvement and adaptability are essential to staying ahead of the curve. **OPENERS & CLOSERS** fosters a culture of learning, growth, and agility to ensure that our innovations remain relevant, competitive, and effective in addressing emerging challenges.

- **Culture of Learning:** We encourage employees to continuously develop their skills and knowledge, fostering a culture of lifelong learning. This includes staying informed about the latest technological trends, sustainability practices, and industry advancements.
- **Agility and Flexibility:** **OPENERS & CLOSERS** embraces adaptability, ensuring that our business processes and innovations can evolve as new challenges and opportunities arise. We prioritize flexibility in our operations and product development, allowing us to pivot quickly when needed.
- **Feedback-Driven Improvement:** We actively seek feedback from customers, employees, and partners to identify areas for improvement. This feedback informs our innovation process, ensuring that our products and services are continuously refined to meet the evolving needs of the market.

By prioritizing continuous improvement and adaptability, **OPENERS & CLOSERS** ensures that innovation remains dynamic, relevant, and forward-thinking.

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## Collaboration and Open Innovation (CoE, CoC)

Collaboration is key to driving successful innovation. **OPENERS & CLOSERS** believes in the power of open innovation, working with partners, customers, and other stakeholders to co-create solutions that push the boundaries of what is possible.

- **Cross-Disciplinary Collaboration:** We foster collaboration across departments, teams, and functions to bring together diverse perspectives and expertise. By working together, we ensure that our innovations benefit from a wide range of insights and experiences.
- **External Partnerships:** **OPENERS & CLOSERS** actively seeks partnerships with universities, research institutions, and other companies to drive open innovation. These partnerships allow us to leverage external expertise, access new technologies, and explore innovative ideas that enhance our product offerings.
- **Customer-Centric Innovation:** Our customers are integral to our innovation process. We work closely with them to understand their needs, gather feedback, and co-develop solutions that address their specific challenges. Customer-driven innovation ensures that our products are relevant, practical, and highly effective.

By embracing collaboration and open innovation, **OPENERS & CLOSERS** accelerates the development of groundbreaking solutions that meet the diverse needs of our stakeholders.

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## Responsible Risk Management in Innovation (CoE, CoC)

Innovation inherently involves risk, but at **OPENERS & CLOSERS**, we are committed to managing these risks responsibly. By adopting a structured approach to risk management, we ensure that innovation is pursued in a way that balances opportunity with prudence.

- **Risk Assessment in R&D:** Before launching new projects, we conduct comprehensive risk assessments to identify potential challenges and unintended consequences. This ensures that we are aware of the risks associated with new technologies and that we have mitigation strategies in place.
- **Ethical Risk Management:** We consider not only the financial or operational risks of innovation but also the ethical implications. This includes evaluating the potential societal impacts of new technologies and ensuring that innovations do not inadvertently cause harm to vulnerable communities or exacerbate inequality.
- **Innovation Governance:** Our innovation process is governed by clear ethical and risk management frameworks that guide decision-making. This ensures that innovations align with our long-term goals, ethical standards, and commitment to sustainability.

By embedding responsible risk management into our innovation process, **OPENERS & CLOSERS** ensures that new developments are pursued with care and consideration for both opportunities and risks.

## Long-Term Value Creation through Innovation (CoE, CoC)

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At **OPENERS & CLOSERS**, we view innovation as a key driver of long-term value creation. Our focus is not just on short-term gains but on developing products and solutions that deliver sustainable value to our stakeholders over time.

- **Sustainable Business Growth:** Innovation is central to our strategy for long-term growth. By continuously developing new products, improving existing solutions, and exploring emerging markets, we ensure that **OPENERS & CLOSERS** remains competitive and relevant in the global marketplace.
- **Customer Value:** We prioritize creating lasting value for our customers through innovative solutions that address their current and future needs. This includes designing products that offer long-term durability, reliability, and performance, ensuring that customers benefit from their investments over the long term.
- **Building a Legacy of Innovation:** Our commitment to innovation extends beyond immediate results. We are focused on building a legacy of responsible innovation that shapes the future of the industry, creates sustainable solutions for the world, and fosters a positive societal impact.

By focusing on long-term value creation, **OPENERS & CLOSERS** ensures that our innovations not only drive success today but also contribute to a brighter, more sustainable future.

## Ethics in AI and Automation (CoE, CoC)

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As artificial intelligence (AI) and automation technologies become increasingly central to modern business, **OPENERS & CLOSERS** is committed to ensuring that these technologies are developed and deployed ethically. We recognize the profound impact that AI and automation can have on society, and we take proactive steps to manage these technologies responsibly.

- **Bias and Fairness in AI:** We are committed to ensuring that AI technologies are free from bias and operate fairly. This includes carefully designing algorithms to avoid discrimination, ensuring that AI systems do not reinforce existing inequalities, and promoting fairness in automated decision-making processes.
- **Data Privacy and Security in AI:** AI and automation rely heavily on data, and we are committed to protecting the privacy and security of that data. **OPENERS & CLOSERS** ensures that all data used in AI systems is collected, stored, and processed in compliance with data protection laws and ethical standards.
- **Human Oversight and Accountability:** While AI and automation can enhance efficiency, human oversight remains essential. We ensure that AI systems are transparent, explainable, and subject to human intervention when necessary. Employees are trained to monitor AI-driven processes, and accountability for automated decisions rests with responsible individuals.
- **Ethical Automation Practices:** In implementing automation, we focus on enhancing productivity and quality while ensuring that workers' rights are protected. Automation is designed to complement human capabilities, and we are committed to upskilling employees to adapt to new technologies, ensuring that automation benefits both the company and its workforce.

By embedding ethics into AI and automation, **OPENERS & CLOSERS** ensures that these powerful technologies are used responsibly and for the benefit of all stakeholders.

Through our **Commitment to Innovation with Responsibility**, **OPENERS & CLOSERS** ensures that technological advancements are pursued ethically, sustainably, and with long-term value in mind. By focusing on the responsible use of technology, sustainable innovation, collaboration, risk management, and the ethical deployment of AI, we position ourselves as a leader in innovation that is aligned with our core values and societal responsibilities.

### 15. SOCIAL RESPONSIBILITY

At **OPENERS & CLOSERS**, we understand that our role as a business extends beyond profitability and innovation---we have a profound responsibility to society. Our commitment to **Social Responsibility** is embedded in both our **Code of Ethics (CoE)** and **Code of Conduct (CoC)**, driving us to ensure that our business activities contribute positively to the communities and environments in which we operate. Through initiatives in environmental sustainability, ethical labor practices, community engagement, and more, we aim to foster a culture of responsibility that supports not only the success of our business but also the well-being of society as a whole.

## Environmental Sustainability (CoE, CoC)

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Environmental sustainability is at the heart of our corporate responsibility. **OPENERS & CLOSERS** is committed to minimizing our environmental footprint and actively contributing to the preservation of natural resources. We integrate sustainable practices across all aspects of our operations, from product design and manufacturing to waste management and energy consumption.

- **Reducing Environmental Impact:** We are dedicated to reducing our carbon footprint, minimizing waste, and conserving water and energy across all operations. By adopting energy-efficient technologies, reducing emissions, and promoting waste recycling, we ensure that our business activities have a minimal impact on the environment.
- **Sustainable Product Lifecycle:** Our commitment to sustainability extends throughout the product lifecycle, from responsible sourcing of materials to end-of-life product recycling. We strive to design products that are durable, energy-efficient, and easy to recycle, supporting a circular economy and reducing environmental harm.
- **Promoting Environmental Awareness:** We actively promote environmental awareness within our workforce and among our partners, ensuring that all stakeholders are informed and engaged in our sustainability efforts. This includes providing training on best practices and encouraging environmental responsibility at every level of the organization.

Through environmental sustainability initiatives, **OPENERS & CLOSERS** ensures that our growth aligns with the global need to protect and preserve the planet for future generations.

## Ethical Labor Practices and Human Rights (CoE, CoC)

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Respect for human rights and the promotion of ethical labor practices are fundamental to our social responsibility commitments. **OPENERS & CLOSERS** is dedicated to ensuring that all employees and partners are treated with dignity and respect, and that our business operates in full compliance with international labor standards.

- **Fair Labor Practices:** We are committed to providing fair wages, safe working conditions, and equal opportunities for all employees, regardless of their background, gender, or role. We adhere to all applicable labor laws and regulations, and we expect the same from our suppliers and partners.
- **Eliminating Forced and Child Labor:** **OPENERS & CLOSERS** has a zero-tolerance policy for forced labor, child labor, and any form of human trafficking. We work diligently to ensure that our supply chain is free from such unethical practices, and we conduct regular audits to verify compliance with these standards.
- **Respecting Workers' Rights:** We are committed to upholding the rights of all workers, including the freedom to organize, the right to collective bargaining, and the right to a safe and healthy work environment. We actively engage with our workforce to ensure that their voices are heard and their concerns addressed.

By promoting ethical labor practices and respecting human rights, **OPENERS & CLOSERS** ensures that our business contributes to a fair and just society.

## Community Engagement and Philanthropy (CoE, CoC)

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**OPENERS & CLOSERS** recognizes the importance of giving back to the communities in which we operate. We are committed to actively engaging with and supporting local communities through philanthropic initiatives, volunteer efforts, and partnerships with non-profit organizations.

- **Corporate Philanthropy:** We support a range of charitable causes and community initiatives through financial donations, in-kind contributions, and sponsorships. Our philanthropic efforts focus on areas such as education, environmental protection, and social welfare, ensuring that we contribute meaningfully to the betterment of society.
- **Employee Volunteering:** We encourage our employees to participate in volunteer programs that align with their interests and our corporate values. By offering paid volunteer days and supporting employee-led initiatives, we foster a culture of community engagement and social responsibility within our workforce.
- **Local Partnerships:** **OPENERS & CLOSERS** collaborates with local organizations to support initiatives that address the specific needs of the communities in which we operate. Whether through environmental conservation efforts or social support programs, we are committed to making a positive impact at the local level.

By engaging with communities and supporting philanthropic efforts, **OPENERS & CLOSERS** strengthens its ties with society and contributes to social progress.

## Diversity, Equity, and Inclusion (DEI) (CoE, CoC)

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Diversity, equity, and inclusion (DEI) are integral to the culture and success of **OPENERS & CLOSERS**. We are committed to creating an inclusive workplace where all employees feel valued, respected, and empowered to contribute their unique perspectives and talents.

- **Promoting Diversity:** We actively promote diversity in our hiring, promotion, and leadership practices. This includes ensuring that all individuals, regardless of race, gender, age, sexual orientation, religion, or disability, have equal access to opportunities within the company.
- **Equitable Policies:** We implement policies that promote equity across the organization, ensuring that all employees receive fair treatment, compensation, and opportunities for advancement. We regularly review our policies to identify and address any barriers to inclusion and equity.
- **Fostering Inclusion:** Our commitment to inclusion goes beyond policy; we strive to create a work environment where all employees feel they belong. This includes providing resources for employee resource groups, facilitating open discussions on DEI issues, and fostering a culture of respect and collaboration.

By prioritizing diversity, equity, and inclusion, **OPENERS & CLOSERS** builds a stronger, more innovative organization that reflects the diverse society in which we operate.

## Responsible Sourcing and Supply Chain Transparency (CoE, CoC)

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As a company committed to ethical business practices, **OPENERS & CLOSERS** ensures that our supply chain operates with transparency, responsibility, and sustainability. We hold our suppliers and partners to high ethical standards and work collaboratively to promote responsible sourcing practices.

- **Ethical Sourcing:** We are committed to sourcing materials and components in a manner that respects human rights, environmental standards, and ethical labor practices. This includes conducting due diligence to ensure that our suppliers do not engage in forced labor, child labor, or other unethical practices.
- **Supply Chain Transparency:** **OPENERS & CLOSERS** promotes transparency throughout our supply chain by requiring suppliers to disclose relevant information about their operations, including labor practices, environmental impact, and compliance with regulations. We regularly audit our supply chain to ensure compliance with our standards.



- **Collaborative Improvement:** We work closely with our suppliers to improve their sustainability practices, offering support and resources to help them meet our ethical and environmental standards. By fostering long-term partnerships, we encourage continuous improvement across our supply chain.

By promoting responsible sourcing and transparency, **OPENERS & CLOSERS** ensures that our supply chain aligns with our commitment to ethical business practices and sustainability.

## Innovation for Social Good (CoE, CoC)

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At **OPENERS & CLOSERS**, we believe that innovation should not only drive business success but also contribute to solving social and environmental challenges. We are committed to developing technologies and solutions that benefit society and improve the quality of life for all.

- **Social Impact Innovation:** We prioritize innovations that address pressing social issues, such as access to safe housing, energy efficiency, and sustainable urban development. By leveraging our expertise in door access technology, we contribute to creating safer, more sustainable communities.
- **Inclusive Innovation:** Our innovation process is guided by the principle of inclusivity, ensuring that the benefits of new technologies are accessible to all, including underserved and marginalized populations. We strive to create solutions that promote equity and reduce barriers to opportunity.
- **Partnering for Good:** We collaborate with non-profit organizations, social enterprises, and government agencies to co-create solutions that address societal challenges. These partnerships allow us to apply our innovation expertise to projects that have a direct positive impact on communities.

Through innovation for social good, **OPENERS & CLOSERS** demonstrates its commitment to using technology and creativity to solve real-world problems and make a meaningful difference in society.

## Alignment with Sustainable Development Goals (SDGs) (CoE, CoC)

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**OPENERS & CLOSERS** is dedicated to aligning our business practices with the **United Nations Sustainable Development Goals (SDGs)**. These goals provide a global framework for addressing critical social, economic, and environmental challenges, and we are committed to contributing to their achievement.

- **SDG Integration:** We integrate the SDGs into our corporate strategy, identifying areas where our business can make a direct contribution to goals such as climate action (SDG 13), decent work and economic growth (SDG 8), and reduced inequalities (SDG 10).
- **Measuring Impact:** We regularly assess our progress toward the SDGs by tracking key performance indicators related to sustainability, social impact, and ethical business practices. This allows us to identify areas for improvement and ensure that our efforts are making a measurable difference.
- **Global Responsibility:** As a global company, we recognize our responsibility to contribute to the SDGs not only in our local operations but also through our global supply chain and partnerships. We actively seek to collaborate with other organizations that share our commitment to the SDGs.

By aligning with the SDGs, **OPENERS & CLOSERS** ensures that our business contributes to global efforts to build a more equitable, sustainable, and prosperous world.

Through our **Commitment to Social Responsibility**, **OPENERS & CLOSERS** ensures that our business practices are aligned with the well-being of society, the environment, and future generations. By promoting sustainability, ethical labor practices, community engagement, and responsible sourcing, we foster a culture of responsibility that extends beyond our company and contributes to the global good.

### 16. CONTINUOUS ETHICAL IMPROVEMENT AND COMMITMENT TO THE FUTURE

At **OPENERS & CLOSERS**, we recognize that ethics are not static---they must evolve in response to new challenges, opportunities, and societal changes. Our commitment to **Continuous Ethical Improvement** reflects our belief that ethical practices must be continually refined and reinforced to remain effective in a dynamic world. This commitment is embedded in our **Code of Ethics (CoE)** and **Code of Conduct (CoC)**, guiding our ongoing efforts to improve our ethical standards, empower our workforce, and adapt to future challenges with integrity and foresight.

## Ethics as a Dynamic Process (CoE)

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Ethics is not a fixed set of rules but a living process that must evolve as the world changes. **OPENERS & CLOSERS** understands that ethical considerations today may differ from those in the future, and we are committed to continuously adapting our ethical framework to reflect these changes.

- **Adaptability in Ethics:** We remain open to reevaluating and updating our ethical guidelines to address new dilemmas, technological advancements, or societal shifts. By treating ethics as a dynamic process, we ensure that our principles remain relevant and effective in guiding decision-making.
- **Proactive Ethical Review:** We conduct regular reviews of our **Code of Ethics** to ensure that it addresses emerging ethical challenges. This includes anticipating future issues related to digital ethics, sustainability, diversity, and evolving stakeholder expectations.
- **Engaging Stakeholders:** We actively engage with employees, customers, partners, and communities to gather insights on how our ethical framework can be improved. By incorporating diverse perspectives, we enhance the inclusivity and relevance of our ethical practices.

By viewing ethics as a dynamic and adaptable process, **OPENERS & CLOSERS** ensures that our commitment to ethical behavior evolves in step with the changing world.

## Learning and Development (CoE, CoC)

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Continuous learning and development are essential for fostering a culture of ethical excellence at **OPENERS & CLOSERS**. We are committed to providing employees with the tools, knowledge, and support needed to navigate ethical challenges confidently and to promote a deeper understanding of ethical issues across the organization.

- **Ethics Training Programs:** We offer comprehensive ethics training to all employees, including new hires and leadership. These programs cover key topics such as ethical decision-making, anti-corruption, data privacy, and environmental responsibility, ensuring that employees are well-prepared to uphold the company's ethical standards.
- **Leadership Development in Ethics:** We provide specialized ethics training for leaders to help them model ethical behavior and create an environment where ethical considerations are prioritized. Ethical leadership development ensures that our leaders set the tone for ethical practices across the organization.
- **Continuous Professional Development:** Employees are encouraged to pursue ongoing education and professional development opportunities that enhance their understanding of ethical practices and industry-specific ethical issues. By fostering a learning culture, we empower employees to grow as ethical decision-makers.

Through learning and development, **OPENERS & CLOSERS** builds a workforce that is knowledgeable, ethical, and equipped to handle future challenges with integrity.

## Accountability Drives Progress (CoE)

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Accountability is a cornerstone of ethical improvement. At **OPENERS & CLOSERS**, we believe that progress in ethical behavior can only be achieved when individuals and teams take responsibility for their actions and decisions. Our commitment to accountability ensures that ethical principles are consistently upheld and that any lapses in ethical behavior are addressed promptly.

- **Personal Accountability:** Employees are expected to take personal responsibility for their ethical conduct. This includes adhering to the company's ethical guidelines, reporting concerns, and being proactive in addressing potential ethical risks in their daily work.
- **Leadership Accountability:** Leaders at **OPENERS & CLOSERS** are accountable for fostering an ethical work environment and ensuring that their teams understand and comply with the company's ethical standards. Leadership accountability is essential for building trust and maintaining a culture of transparency and integrity.
- **Performance Reviews and Accountability:** Ethical behavior is integrated into our performance review process, ensuring that employees are evaluated not only on their achievements but also on how they conduct themselves ethically. This reinforces the importance of accountability as a driver of ethical progress.

By making accountability a driving force for progress, **OPENERS & CLOSERS** ensures that our ethical commitments translate into meaningful action across the organization.

## Looking to the Future (CoE)

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As a forward-thinking company, **OPENERS & CLOSERS** is committed to anticipating and preparing for future ethical challenges. We understand that emerging technologies, social changes, and global issues will shape the ethical landscape of tomorrow, and we are dedicated to staying ahead of these developments to ensure that our values remain relevant and impactful.

- **Emerging Ethical Issues:** We actively monitor trends in technology, business, and society to identify potential ethical challenges before they arise. This includes staying informed about issues such as artificial intelligence (AI), data privacy, environmental sustainability, and social justice, and developing strategies to address these challenges proactively.
- **Future-Proofing Our Ethics:** Our ethical framework is designed to be adaptable, ensuring that it remains robust and effective as new ethical dilemmas emerge. We prioritize flexibility in our ethical guidelines to allow for quick adjustments in response to future developments.
- **Commitment to Innovation with Ethics:** As we innovate, we remain committed to ensuring that our innovations are ethical, sustainable, and aligned with our core values. By incorporating ethical considerations into our innovation processes, we ensure that future developments benefit both the company and society at large.

By looking to the future, **OPENERS & CLOSERS** positions itself to remain an ethical leader in an ever-changing world, ready to face new challenges with integrity and foresight.

## A Call to Action (CoE)

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At the heart of **OPENERS & CLOSERS'** commitment to ethics is the belief that ethical behavior is not just a set of principles---it is a call to action. We encourage every employee, partner, and stakeholder to actively contribute to our ethical mission by making ethical decisions, fostering a culture of integrity, and continuously striving to improve our practices.

- **Empowering Ethical Behavior:** We empower employees to take ethical action in their daily work by providing them with the resources, support, and training they need to make informed decisions. Ethical behavior is not passive---it requires active engagement and commitment.
- **Encouraging Ethical Leadership:** Leaders at **OPENERS & CLOSERS** are called upon to champion ethical behavior by setting a positive example, promoting transparency, and holding their teams accountable for ethical conduct. Leadership plays a critical role in shaping the ethical culture of the organization.

- **Continuous Improvement as a Shared Responsibility:** We view continuous ethical improvement as a shared responsibility across all levels of the organization. By encouraging collaboration, open dialogue, and shared accountability, we ensure that every member of **OPENERS & CLOSERS** contributes to our ethical progress.
- **Inspiring Future Generations:** We are committed to leaving a legacy of ethical leadership and responsibility that will inspire future generations of employees, partners, and leaders. Through our actions today, we set the foundation for a future built on integrity, fairness, and respect.

Through this call to action, **OPENERS & CLOSERS** reinforces its commitment to continuous ethical improvement and invites all stakeholders to join in creating a future defined by ethical excellence and responsibility.

By embracing **Continuous Ethical Improvement and Commitment to the Future**, **OPENERS & CLOSERS** ensures that our ethical framework remains strong, dynamic, and adaptable. Through a proactive approach to ethics, continuous learning, accountability, and a forward-looking perspective, we are prepared to meet the challenges of tomorrow with integrity and dedication.

## 17. CONCLUSION TO THE CODE OF ETHICS AND CONDUCT

The **Code of Ethics and Conduct** of **OPENERS & CLOSERS** is more than a set of guidelines; it is the embodiment of our values, aspirations, and unwavering commitment to doing what is right. It reflects our dedication to integrity, innovation, and responsibility---not just within the walls of our organization, but also in how we interact with the world around us.

As we move forward, this Code serves as both a compass and a call to action. It guides our daily decisions and challenges us to continuously uphold the highest standards of ethical conduct. It empowers each of us---employees, leaders, partners, and stakeholders alike---to contribute to a culture of transparency, accountability, and respect.

Our success is not measured solely by what we achieve but by how we achieve it. By embracing these principles, we commit ourselves to not only advancing our business but also making a meaningful difference in the lives of those we serve and in the world we share. Through sustainable innovation, respect for human rights, and a profound sense of social responsibility, we shape a future that reflects our core belief: that ethics are not just part of our foundation---they are the driving force behind our progress.

Together, we ensure that **OPENERS & CLOSERS** stands as a beacon of ethical leadership, innovation with responsibility, and a true force for good. We take pride in our journey, knowing that with every decision made in line with this Code, we build a legacy of excellence, integrity, and sustainability for generations to come.

This is our commitment. This is our future. This is who we are.