

A photograph of a lone, gnarled pine tree standing on a large, flat, grey rock outcrop. The tree has a thick, textured trunk and a dense, dark green canopy. In the background, there are rolling hills covered in a forest of similar trees, under a hazy, overcast sky. The overall tone is somber and majestic.

HANSEN SUPPLIER CODE OF CONDUCT

July 2023

Question

Introduction



This Code of Conduct (the **Code**) sets out the minimum standards that Hansen Technologies Group (**Hansen**) requires its suppliers to meet in relation to: 1) labour and human rights — including modern slavery laws. 2) business integrity. 3) health and safety, environment, data privacy, and cyber security.

Hansen is committed to conducting its business responsibly and with integrity throughout its business relationships and requires its suppliers to do the same. During their business relationship with Hansen, suppliers must ensure that they and their suppliers (including their employees and subcontractors) (collectively **Supplier**) both comply with applicable laws and regulations and meet or exceed the minimum standards set out in this Code. Hansen also expects its suppliers to conduct an appropriate level of due diligence confirming such on their suppliers.

In addition to any further requirements set out in the agreement with Supplier, compliance with this Code is a key consideration when Hansen makes procurement decisions and is an ongoing condition for doing business with Hansen regardless of whether the Code is formally incorporated into an agreement. Failure to comply may result in Hansen seeking alternative suppliers.

Hansen Technologies Limited are aligned to the principles established in the United Nations Sustainable Development Guide (SDG) and are committed to partnership with supplier companies that also align with the SDG goals.



Labour and human rights

Hansen expects Supplier to respect human rights and provide their employees with working conditions that are in compliance with the international standards, such as the conventions of the ILO and applicable modern slavery laws.

No forced, bonded or indentured labour

Employment shall be freely chosen. Supplier shall ensure that no forced labour of any kind occurs within its business and supply chain. This includes no debt bondage, trafficking, or other forms of modern slavery. To this end, Hansen requires its suppliers to annually self-certify that they adhere in a consistent manner to Hansen's Modern Slavery Policy as updated from time-to-time found [here](#).

No child labour

Supplier shall comply with the minimum legal working age in the country in question or in the absence of such law, by the ILO Convention 138. Supplier must be able to verify the age of all employees to ensure compliance. Supplier must accept the Principles of Remediation (being a program enabling children and underage workers to return to quality education and establish and implement effective systems to prevent the use of child labour in the future) of child and underage workers, and where such labour is discovered, Supplier must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.

Wages, benefits, and transparent record keeping

Supplier must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.

Working hours

Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention. Overtime shall be agreed, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.

No discrimination

All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. Supplier must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

No harassment or abuse

Workers shall be treated with dignity and respect. In particular, Supplier will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.

Freedom of association, grievance mechanisms and recourse

Supplier shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of operation. Workers should have the right to join or form trade unions of their choosing. Supplier should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining. Workers are allowed to select worker representatives. Representatives should not be discriminated against and should have regular access to company management or appropriate process in order to address grievances and other issues.

Supplier must have a policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.



Environment

Supplier shall comply with applicable environmental laws and regulations. Furthermore, Hansen expects Supplier to be committed to limiting their impact on the environment in accordance with international standards and the SDG principles and goals. This may include reducing emissions, recycling, using and promoting renewable energy, conserving resources, and implementing appropriate policies for protection of the environment. Supplier may be requested to provide reports on Supplier Scope 1-3 emissions reduction activities.

Business Integrity

Hansen expects Supplier to conduct business in a manner consistent with the following principles:

No conflicts of interest

Supplier must ensure that they and their officers, directors, and employees (and any of their relatives) avoid a conflict of interest or the appearance of conflict of interest with Hansen. Supplier is to inform Hansen of any actual, potential, and perceived conflicts of interest with Hansen, which includes any personal relationships as well as any kind of interests or financial ties that are potentially conflicting.

Anti-corruption

Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given or received to obtain business or otherwise. More caution shall be exercised when dealing with governments, but this also applies to business in the private sector. Supplier shall comply with applicable laws and regulations related to anti-bribery and anti-corruption and keep accurate records of all payments made and received in cash or in kind, for audit purposes.

Furthermore, Supplier shall refrain providing inappropriate benefits to Hansen employees and notify Hansen if Hansen employees were to ask for any improper benefits. Supplier shall have appropriate policies and procedures in place to monitor compliance with the applicable laws and regulations.

Trade sanctions and export controls

Supplier is required, at all times, to comply with all trade sanctions that are applicable to Hansen and with all applicable export control laws and regulations, including those of Australia, the UN, USA, EU and the UK.

Fair competition and business practices

Supplier is expected to comply with applicable competition laws and regulations and refrain from any actions that may unlawfully hinder competition. Supplier is expected to compete fairly and ethically. Supplier shall not, directly or indirectly, share any sensitive or confidential information of Hansen with Hansen's competitors and vice versa.

Hansen's confidential information and intellectual property

In connection with the business relationship with Supplier, Hansen may share its confidential information and/or intellectual property with the Supplier. Supplier must protect Hansen's and its customers' confidential information and respect and protect the intellectual property rights of Hansen and other third parties.

Responsible sourcing of minerals

Supplier is expected to ensure that they and their suppliers conduct appropriate due diligence to confirm that they only use minerals and metals that are responsibly sourced and traded without contributing to human rights violations or other unethical business practices.

Health and Safety

Supplier must provide a safe and healthy working environment that meets or exceeds applicable standards and legal requirements and ensure their employees contractors, consultants, and any other operations that occur in their supply chain are aware and comply with such standards and requirements. Supplier shall have processes in place for mitigating, responding to, managing and reporting workplace incidents and emergencies.

Data Privacy and Cyber Security

Supplier must comply with all applicable IT security and privacy laws and perform its services in a manner consistent with Hansen's privacy and IT security policies. To the extent applicable, Supplier must implement appropriate technical and organisational measures consistent with Hansen's IT Security Handbook in connection with Supplier's business relationship with Hansen.

In connection with any personal data or equivalent (as defined in the applicable data protection legislation) that is processed by the Supplier on behalf of Hansen, the Supplier must enter into appropriate data processing agreements with its suppliers and with Hansen and must regularly train its employees in their data privacy obligations and Hansen's requirements for processing personal data received in connection with Supplier's relationship with Hansen. Supplier must have processes in place for managing data breaches and incidents, including processes for promptly notifying Hansen thereof.

Hansen's privacy policy can be found [here](#).

Our IT Security Handbook is available on request.

Management and Compliance

Compliance and Grievance Mechanisms

Supplier shall implement, maintain, and communicate policies consistent with this Code to relevant parties and be able to demonstrate compliance with this Code.

Any suspected non-compliance with applicable criminal laws and regulations or the requirements of this Code must be promptly reported to Hansen, where permitted by law, and Hansen will treat all reports in a confidential manner and anonymously in accordance with Hansen's whistleblower policy. Supplier must ensure that they provide confidential means for their personnel to report any violations of this Code without fear of retaliation (such as via an appropriate whistleblower policy). Supplier is expected to cooperate with Hansen in any investigations.

Audit Rights and Supplier Risk Assessment Questionnaire

In addition to any possible audit right set out in any agreement between Hansen and Supplier, the Supplier agrees that Hansen has the right, at any time, to audit the Supplier in order to verify and assess their compliance with this Code either directly or using an independent third-party auditor. The Supplier agrees to provide Hansen with all relevant information, documents and access to employees and premises as reasonably required in connection with such audits.

In connection with onboarding a new Supplier, an initial Supplier Risk Assessment Questionnaire should be completed. Suppliers may be requested to complete the Supplier Risk Assessment Questionnaire from time to time to ensure that information provided remains up-to-date and accurate.

Consequences of Violations

Supplier understands that a breach of this Code may be a material breach of the agreement between the parties and may lead to termination of the agreement.

At Hansen we believe that a better future can only be achieved by promoting ethical behaviour. We understand that this requires a collective effort, and we are committed to doing our part by fostering an environment of honesty, accountability, and fairness.

By working together with our employees, partners, and the community, we can make a positive impact on the world and help shape a better future for everyone.