



**Version 1**

# **Code of Conduct Policy**

**Global**

**March 2024**

Version: 1

Document Owner: Global Human Resources Director

Approved by: Global General Counsel

Effective From: March 2024

Next review Date:

Related Documents: None

Languages translated: English

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# Code of Conduct

## 1. Purpose

The purpose of the Code of Conduct Policy is to establish a clear and unwavering commitment to ethical behaviour, legal compliance, and responsible corporate citizenship across our global operations.

This policy serves as a guiding framework, emphasising the importance of our ability to conduct business activities and transactions with the highest level of integrity and ethical standards, and in compliance with all applicable laws, rules, and regulations. Setting out ethical standards, emphasising integrity, transparency, and fairness in professional activities. It addresses workplace behavior, detailing expectations for professionalism. It encompasses diversity and inclusion principles, conflict resolution and provides for managing disputes and ethical challenges.

We strive to be the market leader, committed to setting industry leading standards in all measures of business performance and customer service. We encourage all our workers to exhibit the highest levels of personal integrity, teamwork, and appreciation for our diverse individual and company cultures. We believe in always treating people fairly, whether worker, supplier, service provider, or customer, while always looking for ways to improve our service and contribution to the communities in which we live and work.

## 2. Scope of the Policy

This policy applies to all permanent and temporary workers of Hansen or its subsidiaries.

The Code of Conduct applies to conduct within a workplace, a client location, remote working or elsewhere.

This policy does not cover every issue that may arise, but it is an important resource that sets out the core principles that govern all Hansen workers and how we do business. If a worker is uncertain of the relevance or interpretation of this policy, or the appropriate course of action, they should consult with their manager.

## 3. Definitions

For the purposes of this policy, unless otherwise stated, the following definitions shall apply:

Term	Definition
Worker	A worker who works full time, part time, casual or for a fixed period.
Employment Contract	The contract of employment provided to a worker upon joining Hansen or at

Term	Definition
	the commencement of their current role.
Termination	The end of the employment relationship with Hansen.
Criminal Activity	As defined by the laws that govern the country where the offence was committed.
Report	Where any instances are reported to a manager or HR representative.
Gifts	Gifts include, but are not limited to, physical items, event tickets, and hospitality or entertainment opportunities (such as meals, travel accommodations, leisure activities).

## 4. Policy

Hansen aims to foster an environment and culture that is safe, inclusive, professional, trustworthy and service-focused. An ethical and professional organisation relies on workers being accountable for their own actions and decisions and the appropriate encouragement, feedback and modelling from supervisors and managers.

Workers are expected to understand and comply with the Code of Conduct and hold colleagues to the same standards. Failing to understand the Code of Conduct will not be considered a reasonable excuse for non-compliance.

### 4.1 Hansen Values

The Hansen Values provide a clear framework for expected behaviours to enhance our culture. All workers must perform and behave in ways that align with our Values.

- **One United Team** - sharing knowledge with your colleagues (and clients). Leveraging our global experiences. Fostering an environment that encourages innovation and facilitates openness and transparency.
- **Focused and Committed** – always focused on understanding the customer’s needs and being passionate about delivering an exceptional customer experience.
- **Treat it like it’s your own** - make business decisions with the same level of consideration as you would if you were making them for yourself.

- **People and Family** - we care about others. We are respectful and treat others as we would like to be treated. We genuinely embrace our differences, knowing this only adds to our ability to solve problems and be more innovative.

## 5. Personal Responsibility

All Hansen workers are responsible to ensure they:

- Be aware of and comply with the Code of Conduct.
- Model our Values.
- Understand and act in accordance with the objectives and philosophy of Hansen.
- Perform duties with professionalism, objectivity, and integrity in a way reflects favorably on the organisation as a whole.
- Treat others fairly and not engage in any behaviour that amounts to discrimination, bullying or harassment (including sexual harassment).
- Report behaviour that may be contrary to the Code of Conduct and required standards of behaviour.
- Maintain a safe working environment, including reporting any risks, hazards or incidents.
- Keep information obtained during the course of your duties confidential and only discuss it within appropriate professional situations and contexts.
- Comply with the prescribed terms and conditions of your Employment Contract.
- Demonstrate duty of care in relationships formed in the course of your work and the performance of your duties.
- Use information technology, including internet and email, in a professional and appropriate manner, in accordance with relevant Hansen policy.
- Perform duties skillfully, diligently and efficiently to contribute to the effective and economical achievement of Hansen goals and achieve the performance criteria required in your position.
- Comply with reasonable and lawful requests and directions and adhere to policy and procedural requirements (which may be reviewed from time-to-time).
- Maintain and develop knowledge relevant to your professional field.
- Do not engage in any form of Criminal Activity and inform your manager if you are charged with a criminal offence, which in the event you are convicted, will impact your role.
- Act responsibly in the event of becoming aware of any unethical behaviour or wrongdoing by any other member of the Hansen team and report such conduct or activities to the appropriate level of management
- Do not attend work affected by intoxicating substances or in any other way unfit to perform your duties.
- Maintain a standard of dress appropriate to your role and location.
- Be punctual in your attendance and notify your manager prior to the scheduled commencement time if you are unable to attend at the scheduled time.

- Commit to excellence in service delivery by listening to clients, responding to issues and acting fairly, courteously and efficiently.
- Do not use contacts made in the course of employment as a source of referral to your own or other's business.

## 6. Discrimination

All Hansen workers have a right to a workplace free of discrimination and Hansen does not condone any form of discrimination.

Discrimination is defined as any action or decision that unfairly differentiates, excludes, or disadvantages individuals or groups based on characteristics such as race, gender, age, disability, sexual orientation, religion, ethnicity, nationality, or any other status defined by local laws. The Code of Conduct aims to promote equal treatment and opportunity, ensuring that all individuals are judged based on their merits and abilities, without bias or prejudice, fostering an inclusive, respectful, and equitable work environment

### 6.1 Direct Discrimination

Occurs where someone is treated less favorably explicitly because of a characteristic, the following examples are not exhaustive:

- Overlooking an worker for promotion because of their religious beliefs
- Inciting racial bias or serious contempt of a person on the grounds of gender, race and/or religion
- Not considering a qualified applicant for a position due to gender

### 6.2 Indirect Discrimination

Occurs where neutral policies or practices disproportionately impact certain groups, the following examples are not exhaustive:

- The only way to enter a building is by a stairwell, with no wheelchair access.
- All workers must work on Saturdays, this does not consider religious beliefs.

## 7. Harassment

All Hansen workers have a right to a workplace free of harassment and Hansen does not condone any form of harassment

Harassment is defined as any unwanted, unwelcome, or offensive behavior that intimidates, offends or humiliates a person. This behavior can be based on a variety of characteristics including race, gender,

sexual orientation, religion, age, disability, nationality, or any other personal characteristic. Definitions are often determined by local laws.

Harassment can manifest in various forms, such as verbal comments, jokes, emails, physical actions, gestures, or the display of offensive materials and can occur in person or through digital communication channels.

Just because someone does not object to inappropriate behaviour in the workplace at the time, does not mean they are consenting to the behaviour.

## 7.1 Non-Sexual Harassment

Is any form of unwanted, inappropriate, or offensive behavior that is not of a sexual nature, the following examples are not exhaustive:

- Making derogatory remarks, jokes, or slurs about a person's race, ethnicity, or national origin. This can also include mocking someone's accent or cultural practices.
- Mocking or belittling a person because of their disability, or making offensive remarks about their capabilities or appearance.
- Making offensive remarks or discriminating against someone because of their marital status or family situation, such as being a single parent.

## 7.2 Sexual Harassment

Is any form of unwanted, inappropriate, or offensive behavior that is of a sexual nature, the following examples are not exhaustive:

- Intrusive questions or comments about a person's private life or the way they look
- Sexually suggestive behaviour, such as leering or staring
- Brushing up against someone, touching, fondling or hugging
- Sexually suggestive comments or jokes
- Displaying offensive screen savers, photos, calendars or objects
- Repeated unwanted requests to go out
- Requests for sex
- Insults or taunts of a sexual nature
- Sending sexually explicit emails or text messages
- Inappropriate advances on social networking sites
- Behaviour that may also be considered to be an offence under criminal law

## 8. Bullying



All Hansen workers have a right to a workplace free of bullying and Hansen does not condone any form of bullying

Workplace bullying is repeated, unreasonable behaviour directed towards an worker, or group of workers, that creates a risk to health and safety. Bullying can be deliberate or unintentional.

This behavior can manifest in various forms, including but not limited to:

- **Verbal Bullying:** Making derogatory remarks, threats, insults, or using abusive language directed at an individual.
- **Physical Bullying:** Physical aggression or harm, such as hitting, pushing, or damaging someone's personal property.
- **Social or Relational Bullying:** Actions aimed at harming someone's reputation or social relationships, including spreading rumors, intentional exclusion, or public humiliation.
- **Cyberbullying:** Using digital platforms or technology to harass, threaten, or embarrass someone, often anonymously.
- **Psychological Bullying:** Behaviors that cause psychological harm, such as gossiping, intimidation, manipulation, or stalking.
- **Professional Bullying:** Giving workers work they cannot complete, 'nit picking', continual unreasonable criticism.

## 9. Acceptance of Gifts

Hansen is committed to maintaining the highest standards of integrity and professionalism. Therefore workers must ensure that the acceptance of gifts, entertainment and hospitality from customers, potential customers or business partnerships does not influence decision making processes, leads to conflicts of interest or compromise ethical standards.

### 9.1 Permissible Gifts

Workers may accept unsolicited gifts of nominal value \$200 that are customary and conform to reasonable ethical and social standards. Such gifts should not be frequent from the same source.

The acceptance of gifts, regardless of their value, is strictly prohibited if it could be perceived to influence the recipient's objectivity, decisions, or performance of professional duties. This includes, but is not limited to, gifts received during procurement processes, contract negotiations, or any situation that may affect business decisions.

All gifts, entertainment, and hospitality received from clients or potential clients that exceed nominal value must be reported to ASKHR.

## 10. Conflict of Interest

A conflict of interest occurs when a workers personal or professional interests' conflict with their responsibility to act in the best interests of Hansen. Personal interests include direct interests in businesses that may be providing goods or services, current or potential customers to Hansen. It also includes the interest of family, friends, or other organizations a worker may be involved with or has an interest in Hansen.

A conflict of interest may be actual, potential, or perceived and may be financial or non-financial. Therefore, it is important that workers are always cautious and declare any interest early or if there is any doubt.

### 10.1 Responsibilities

When dealing with actual or perceived conflict of interest workers, contractors and directors:

- must disclose these as soon as they arise
- shall not allow their personal or professional interests, or that of an associated person, to conflict with their obligations towards the Hansen
- shall use their powers for a proper purpose, and not take improper advantage of their position to seek personal gain
- must not enter into any arrangement or participate in any activity that would be likely to negatively affect Hansen's reputation
- shall not make improper use of information acquired in the course of the workers duties
- shall not accept any item for personal gain, improper payments, bribes or other gifts of significance

## 11. Anti-Corruption

Hansen has a zero-tolerance policy towards corruption in all its forms, including bribery, extortion, fraud, and other corrupt practices. Workers are prohibited from engaging in any activity that constitutes corruption or that may give rise to a conflict between their personal vested interests and the interests of the organization or its shareholders.

Workers must not, directly or indirectly, offer, promise, give, accept, or demand a bribe or other undue advantage (including gifts, hospitality, entertainment, and other benefits) to or from anyone to obtain or retain business, influence a business decision, or gain any improper advantage.

## 11.1 Vested Interests

Workers must avoid any situation where personal or financial interests could influence, or appear to influence, their professional judgment or obligations to Hansen. This includes investments, ownership, or any form of business involvement with competitors, customers, suppliers, or contractors that could affect the workers decision-making.

Workers are responsible for conducting due diligence to ensure compliance with this policy when appointing third parties, such as agents, consultants, or intermediaries, who will represent the organization.

In addition to adhering to this policy, workers are required to comply with all applicable anti-corruption laws and regulations of the countries in which we operate.

## 12. Failure to Comply

Workers may be subject to disciplinary action, up to and including termination of employment or contract, where it is established that you have breached the Code of Conduct.

## 13. Complaints

Follow the complaints procedures outlined in the Complaints Policy.

## 12. Policy Review Log

Version:	Date of review:	Description of changes made:	Approved by:
1.0	March 2024	Initial version created. No prior review available.	Julia Chand, Global General Counsel & Company Secretary.



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