



Version 1.3

Code of Conduct

Global

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1. Purpose

The purpose of the Code of Conduct 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. It sets out ethical standards, emphasising integrity, transparency, and fairness in professional activities. It addresses workplace behavior, detailing expectations for professionalism. It encompasses Diversity Equity and Inclusion (DEI) 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. We are committed to continuous improvement and regular training on ethical behavior and DEI principles.

2. Scope

This policy applies to all permanent and temporary workers of Hansen or its subsidiaries including contractors, interns, and consultants.

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

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
Criminal Activity	As defined by the laws that govern the country where the offence was committed.
Discrimination	Is any action or decision that unfairly differentiates, excludes, or disadvantages individuals or groups based on characteristics such as race, gender, gender identity or expression, age, disability, sexual orientation, religion, ethnicity, nationality, or any other status defined by local laws. Discrimination may be direct or indirect in nature
Duty of Care	Is a legal or moral responsibility to take all reasonable steps to not cause foreseeable harm to another person or their property.
Employment Contract	The contract of employment provided to a worker upon joining Hansen or at the commencement of their current role.
Gifts	Gifts include, but are not limited to, physical items, event tickets, and hospitality or entertainment opportunities (such as meals, travel accommodations, leisure activities).
Harassment	Is as any unwanted, unwelcome, or offensive behaviour that intimidates, offends or humiliates a person. This behaviour can be based on a variety of characteristics such as race, gender, gender identity or expression, age, disability, sexual orientation, religion, ethnicity, nationality, or any other status defined by local laws.
Report	Where any instances are reported to a manager or HR representative.
Termination	The end of the employment relationship with Hansen.
Worker	A worker who works full time, part time, casual or for a fixed period.

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. Additionally, Hansen is committed to ongoing education and training in the principles outlined in this Code.

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.
- Commit to ongoing education and training to enhance the understanding of principles outlined in this Code.

6. Discrimination

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

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 a 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

Indirect Discrimination occurs where neutral policies or practices disproportionately impact certain groups. The following are examples (although this is not exhaustive list):

- The only way to enter a building is by a stairwell, with no wheelchair access.
- No headwear can be worn in offices 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. Hansen has a zero-tolerance policy towards any form of harassment, including sexual harassment.

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.
- Sexual Assault.
- 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.

Employees are encouraged to report sexual harassment through multiple channels:

- Speak with HR
- Consult your manager (if appropriate)
- File an incident report on People Hub
- Refer to the Whistleblowing Policy for guidance

Managers receiving a complaint must take action by consulting HR or following these reporting steps. See Section 14 for details. Every report is taken seriously, regardless of those involved. Support can be made available for affected individuals, witnesses, managers handling complaints, and those accused through employee assistance programs/other support platforms and/or HR.

Hansen recognises that individuals impacted by sexual harassment may require time away for personal well-being, counselling, or legal matters. Requests will be managed with sensitivity and confidentiality under applicable leave policies. Employees are encouraged to discuss their needs with HR or their manager to ensure

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appropriate support.

7.3 Third Party Sexual Harassment

The company has zero tolerance for harassment by third parties, including clients, customers, vendors, and contractors. The definitions in Section 7.2 apply equally to these interactions.

All reports will be handled confidentially and addressed promptly, with appropriate action taken when necessary, including investigations and potential termination of agreements.

Employees can report incidents through:

- Their manager
- A designated HR representative
- The People Hub incident report
- The Whistleblowing Policy

No employee will face retaliation for reporting third-party harassment.

8. Bullying

Bullying is not tolerated at Hansen. Bullying includes a range of behaviors that can intimidate, offend, degrade, or humiliate an individual or group, creating a hostile work environment. This behavior can be physical, verbal, or psychological, and it can occur in person or through digital communication channels. 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 tasks they cannot complete, 'nit picking', continual and unreasonable criticism.

Non exhaustive examples of Bullying:

- Repeated hurtful remarks, attacks, or making fun of your work or you as a person, such as your family, sex, sexuality, gender identity, gender expression, race, appearance or culture.
- Sexual harassment, including unwelcome touching and sexually explicit comments

and requests that make you uncomfortable.

- Excluding you or stopping you from working with people or taking part in activities that are an essential part of your role.
- Playing mind games, ganging up on you, or other types of psychological harassment.
- Intimidation (making you feel less important and undervalued).
- Giving you pointless tasks that have nothing to do with your job.
- Giving you impossible jobs that can't be done in the given time or with the resources provided.
- Deliberately changing your work hours or schedule to make it difficult for you.

9. Acceptance of Gifts

Hansen is committed to maintaining the highest standards of integrity and professionalism.

Workers must not accept or give gifts where it may be perceived as intended or likely to cause a conflict of interest with Hansen.

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.

Workers must disclose to the relevant senior manager any gift (or offer of a gift) that is made to them or their family. Workers are not permitted to accept any gifts from current or potential vendors that could influence or appear to influence their decision-making. When accepting any gifts, workers must ensure that the acceptance aligns with ethical standards, ensuring transparency and fairness in all interactions.

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 (askHR@hansencx.com).

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 organisations 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. Workers must disclose to their manager any situation that may create an actual or perceived conflict of interest. This includes, but is not limited to, financial interests, personal relationships, or any other activities that could compromise the objectivity of their professional judgment. Any potential conflicts, such as biases or favoritism, must also be addressed and managed appropriately to ensure fair treatment and decision-making. 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; and
- 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, facilitation payments, extortion, fraud, embezzlement, money laundering and other corrupt practices.

Workers must act with the highest level of integrity and avoid engaging in any activities that could be construed as corrupt.

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 organisation or its shareholders.

Ethical behavior is essential in fostering an inclusive and equitable workplace, free from corrupt practices. This includes adhering to all applicable anti-corruption laws and regulations and reporting any suspected corrupt activities to the appropriate authorities.

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. Workers are therefore prohibited from making of political contributions on behalf of Hansen including providing financial donations, loans, sponsorships, retainers, or the support of organisations funding political campaigns/parties such as Political Action Committees or Associated Entities

An expenditure for lobbying purposes (e.g. contributions to relevant business associations, administrative costs, payments to lobbying service providers) must be publicly disclosed including Hansen's position on topics that are the focus of its lobbying activities and/or original documents and position papers used for lobbying purposes.

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 organisation.

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. Anti-Competitive Conduct

At Hansen, we are committed to fostering fair competition in all aspects of our business operations and supply chain. We believe in upholding the principles of integrity, honesty, and transparency in our interactions with competitors, customers, and stakeholders. Our commitment to ethical conduct extends to ensuring that we comply with all applicable laws and regulations governing competition and antitrust.

12.1 Compliance with Anti-Trust Laws

We strictly adhere to antitrust laws and regulations in all jurisdictions where we operate. All workers, contractors, and representatives are expected to understand and comply with antitrust laws, including but not limited to laws prohibiting agreements or practices that restrict competition, such as price-fixing, bid-rigging, market allocation, and other anti-competitive behaviors.

12.2 Fair Competition

We believe in competing vigorously and ethically in the marketplace. We do not engage in unfair, deceptive, or anti-competitive practices that harm consumers, competitors, or the market as a whole. Our business decisions are based on the merits of our products and services, and we strive to differentiate ourselves through innovation, quality, and customer satisfaction. Worker must not engage in any activities that go against these values.

12.3 Avoiding Collusion and Concerted Practices

Workers must not engage in any form of collusion, concerted practices, or agreements with competitors that may have the effect of restriction competition or harming consumers. This includes exchanging sensitive competitive information, coordinating pricing or terms of sale, dividing markets or customers, or engaging in any other anti-competitive conduct that undermines free and fair competition.

12.4 Intellectual Property Rights

Workers and contractors must not engage in any conduct that violates patents, trademarks, copyrights or other intellectual property rights. We compete fairly and lawfully in the marketplace, avoiding infringement of third-party intellectual property rights and protecting our own intellectual property assets through appropriate legal means.

13. Failure to Comply

Failure to comply with this Code of Conduct, may result in disciplinary action, up to and including termination of employment. Workers are expected to understand and uphold the standards outlined in this policy and to act in a manner that reflects positively on Hansen and its values.

14. Complaints

Reporting non-compliance is an important part of identifying and mitigating misconduct and harm across Hansen's operations and supply chain. We encourage individuals to report an issue if they believe they have been subjected to, or have witnessed, conduct that violates this Code of Conduct. This can be done via Hansen's Complaint & Grievance policy as well as the Whistleblower Policy. Individuals can report their concerns to their manager or HR representative, without fear of retaliation, intimidation, harassment, discrimination or victimisation.

Complaints will be handled promptly, thoroughly, and confidentially, ensuring a supportive and responsive environment for all workers, particularly those from underrepresented groups. Hansen is committed to protecting individuals who report concerns from retaliation and ensuring a fair and unbiased investigation process.

Hansen offers multiple, confidential ways for workers to report concerns ensuring protection from retaliation. Workers can report their concerns anonymously, or directly to designated HR representatives. In the event of sexual harassment, file an incident report on the People Hub page.

15. Training and Development

Hansen aims to provide regular training on ethics (including, but not limited to, anti-corruption and conflict of interest), DEI, and responsible conduct, with the objective of training 100% of our workforce to enhance their understanding of the principles outlined in this Code. Hansen will aim to monitor, measure and report on training outcomes.

Failure to undertake and receive a satisfactory score in each training exercise may impact a Workers eligibility for Bonus or Profit Share payment, repeated failures may result in disciplinary action, up to and including termination of employment.

16. Monitoring and Continuous Improvement

This policy is managed and communicated by the Human Resources Department.

Activities related to the physical administration of this Policy will be undertaken by the Administration and IT services leads in each of our offices globally.

Hansen will conduct regular risk assessments relating to ethical conduct and regularly monitor and review the Code of Conduct to ensure it remains relevant and effective in promoting ethical behavior and DEI. This includes soliciting feedback from workers and making necessary updates to reflect evolving standards and best practices.

This policy is reviewed annually to ensure compliance with legal requirements and to uphold fairness and equity for all employees.

Policy Review Log

Version:	Date of review:	Description of changes made:	Approved by:
1.0	March 2024	Initial version created. No prior review available.	Global General Counsel & Company Secretary.
1.1	July 2024	Enhanced descriptions for greater clarity and linkages to other policies	Global General Counsel & Company Secretary.
1.2	August 2024	Review for currency and accuracy. No material changes made	Julia Chand, Global General Counsel & Company Secretary and Board of Directors
1.3	April 2025	Review in relation to latest UK legislation – prevention of sexual harassment in the UK	Julia Chand, Global General Counsel & Company Secretary and Board of Directors



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