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# HANSEN SUPPLIER CODE OF CONDUCT JULY 2024



#### INTRODUCTION

At Hansen we are committed to setting a high industry standard in business performance and customer service, doing so in an ethical, sustainable and socially responsible manner. We expect the same standards from our suppliers.

This Supplier Code of Conduct (the "**Code**") explains our expectations and provides guidance for meeting these shared standards. It is not intended to serve as replacement or substitute for any applicable laws. This Code applies to all suppliers with a business relationship with Hansen, including vendors, contractors, and consultants. Suppliers are expected to communicate this Code to related parties including their own suppliers and subcontractors. Hansen also expects its suppliers to conduct an appropriate level of due diligence of their suppliers and subcontractors to ensure they comply with applicable laws and regulations and meet or exceed the standards and expectations set out in this Code.

Compliance with expectations set out in this Code is a key consideration for Hansen when making procurement decisions. We encourage suppliers to engage in continuous improvement processes and report on progress and encourage regular engagement with Hansen to gather feedback and improve the Code's effectiveness. Hansen may at any time review or audit a supplier's compliance with this Code. Failure to comply may result in Hansen seeking alternative suppliers.

#### **ENVIRONMENTAL OBLIGATIONS**

Hansen is dedicated to minimising our environmental impact, fostering a culture prioritising sustainability, and helping our customers and suppliers address their environmental challenges. We have outlined our practices in our <u>Environment and Climate</u> <u>Change Policy</u> and <u>Waste and E-Waste</u> <u>Management Policy</u>, and we strongly encourage our suppliers to adopt similar practices. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices, including:

- Complying with all applicable environmental laws and regulations, including mandatory reporting obligations.
- Obtaining, maintaining, keeping current and complying with necessary environmental permits, approvals, and registrations.
- Maintaining policies and practices that reduce the risks of air and water pollution, biodiversity loss, deforestation, and ecosystem damage across their business operations and supply chains.
- Maintaining policies and practices prioritising efficient use of energy, water and natural resource consumption across their business operations and supply chains. We encourage suppliers to conduct end-of-life cycle analyses of their products and services where possible.
- Prioritising the development of products and services that reduce waste and improve environmental performance across their life cycle and at the end of useful life, including low energy consumption, supporting greenhouse gas (GHG) emissions reductions, and optimising product reuse or recycling.
- On request, to provide reports on their scope 1-3 emissions reduction activities.

#### SOCIAL OBLIGATIONS

Hansen recognises and respects the human rights of every person involved in our operations, supply chain, and communities in which we operate. We are committed to acting ethically and with integrity and ensuring everyone is treated fairly and respectfully.

Hansen is committed to respecting all internationally recognised human rights, including the Universal Declaration of Human Rights, the International Labour Organisation's ("ILO") Core Conventions, and the ILO Declaration on Fundamental Principles and Rights at Work.

We are also committed to adhering to the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

We also encourage suppliers to engage positively with local communities and contribute to local social and economic development.

We believe in doing business only with suppliers who share this commitment. To achieve this, at a minimum, Hansen expects all its suppliers to:

- Conduct regular human rights impact assessments and, from time-time, require suppliers to report on their findings.
- Ensure their workers and contractors are made aware of their social obligations and are appropriately trained in the following areas:

#### **Diversity and equal opportunity:**

Hansen believes in fostering a diverse, equitable and inclusive environment for all workers, employees, suppliers and partners. For this reason, we seek to work with suppliers who promote diversity and equal opportunity in their business and supply chain, including those who:

- Commit to diversity and inclusion targets within their business operations and procurement.
- Demonstrate strong female gender representation, improved gender equality, and active promotion of women and under-represented groups.
- Initiate procurement activities to improve vulnerable or disadvantaged people and promote economic inclusion.
- Establish and report on diversity and inclusion metrics, including the representation of underrepresented groups in the workforce.
- Encourage the implementation of support programs for disadvantaged groups within their workforce and supply chains.

### Anti-discrimination, harassment, bullying, and occupational violence:

Hansen has a zero-tolerance approach to verbal, physical, or visual harassment or other behaviour that creates an offensive, hostile, or intimidating work environment or disrupts another person's ability to work.

This includes sexual, sexist, racial or ethnic comments, offensive jokes or gestures, sexually suggestive pictures, email or voice messages, sexual advances or comments and bullying.

Suppliers must not discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race,

religion, sexual orientation, gender identity, union membership, or any other status protected by law in hiring and other employment practices. Suppliers must not bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual, or psychological.

Suppliers must demonstrate steps taken to providing a workplace free from harassment or bullying, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment and have clear, documented procedures for addressing complaints of discrimination, harassment, and bullying. Suppliers are also expected to establish support systems such as counselling services and grievance mechanisms, for affected employees.

### Working hours, wages, benefits, and transparent record keeping:

Suppliers must comply at a minimum with all laws regulating local wages, working hours, overtime compensation and legally mandated benefits. This includes ensuring that all employees and workers are paid a living wage (a living wage is defined as providing sufficient income for a worker to cover basic needs like food, housing, healthcare, education, and transport, plus some discretionary income. It should be enough for a decent standard of living and adjusted for local costs), provided adequate working conditions, and can raise any concerns via an appropriate channel. Record keeping must be accurate and transparent.

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 upon, shall not be excessive, shall not be requested on a regular basis, and shall be compensated as prescribed by applicable local laws. Suppliers are also expected to conduct regular audits to ensure compliance with wage and working hour regulations. They are encouraged to enhance transparency by publicly disclosing their wage and benefit policies. 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.

#### Modern Slavery (including forced, compulsory, bonded or indentured labour, and child labour):

Suppliers are strictly prohibited from engaging in forced or compulsory labour and child labour. Suppliers must not use any form of forced, bonded, or compulsory labour, slavery, or human trafficking in any part of their business operations and supply chain.

Suppliers must ensure that migrant workers have the same entitlements as local workers as stipulated by local law. Suppliers must not require workers to surrender any governmentissued identification, passport, or other personal documents as a condition of employment. Workers shall not be required to pay employers' or agents' recruitment or any other fee for their employment.

Suppliers must ensure that all employment is voluntary, workers are of legal age, and working conditions are safe and appropriate for individuals of all ages. Suppliers shall comply with the minimum legal working age in the country in question or the absence of such law by the ILO Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Suppliers 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. Where such labour is discovered, suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.

Consistent with relevant modern slavery legislation, international human rights standards, and our Human Rights Policy, suppliers are expected to conduct regular risk assessments to proactively identify, address and – where required by legislation – report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) or other human rights violations in their business operations and supply chains and develop and implement remediation plans for any identified cases of modern slavery or other human rights violations.

### Freedom of association and collective bargaining:

Suppliers are expected to 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.

Suppliers should not interfere with, obstruct, or prevent legitimate activities like 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 processes to address grievances and other issues.

Suppliers must have a policy in place supporting freedom of association, provide regular training on these rights and have policies and procedures in place to establish effective grievance mechanisms enabling workers to approach management on issues of concern, on their own or through worker representatives, confidentially if they wish.

#### **Working Conditions:**

Where a supplier provides accommodation to their workers, the accommodation must be clean, safe, and meet the workers' basic needs. Workers must have access to clean toilet facilities, clean drinking water, and, where appropriate, sanitary facilities for food storage and preparation.

Workers have a right to refuse unsafe work. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied, and workers trained in their use.

We encourage suppliers to conduct regular health and safety audits, implement corrective actions for any identified issues, and have comprehensive emergency preparedness and response plans in place.

#### Health and safety:

Supplier must provide a safe, hygienic, 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. Suppliers must have processes in place for mitigating, responding to, managing and reporting workplace incidents and emergencies.

#### **GOVERNANCE OBLIGATIONS**

At Hansen, we expect everyone, including our suppliers, to act ethically and with integrity by being honest, transparent and trustworthy in all dealings. We have outlined some key areas where we expect best practices from our suppliers:

#### No conflicts of interest:

Suppliers 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. Suppliers must inform Hansen of any actual, potential, and perceived conflicts of interest with Hansen, which includes any personal relationships and any kind of interests or financial ties that are potentially conflicting, and establish processes for addressing any identified conflicts.

#### Anti-corruption:

Hansen has a zero-tolerance policy towards corruption in all its forms, including bribery, extortion, fraud, and other corrupt practices. Suppliers are expected to employ reasonable measures and controls to ensure that their officers, directors, employees, suppliers and other related parties, do not commit fraud, bribery or corruption, or become involved in such activities. We encourage suppliers to provide detailed reporting on anti-corruption measures, including training programs and incident reporting.

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. 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. All suppliers must 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, suppliers must refrain from providing inappropriate benefits to Hansen employees and notify Hansen if Hansen employees were to ask for any improper benefits. Suppliers must have appropriate policies and procedures in place to monitor compliance with the applicable laws and regulations.

#### Trade sanctions and export controls:

Suppliers are 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:

Suppliers are expected to comply with applicable competition laws and regulations and refrain from any actions that may unlawfully hinder competition. Suppliers are expected to compete fairly and ethically. Suppliers 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 suppliers, Hansen may share its

confidential information and/or intellectual property with you. Suppliers 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:

Suppliers are 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.

#### Data Privacy and Cyber Security:

Suppliers must comply with all applicable IT security and privacy laws, including applicable international data privacy standards, and perform their services in a manner consistent with Hansen's privacy and IT security policies. To the extent applicable, suppliers must implement appropriate technical and organisational measures consistent with Hansen's IT Security Handbook in connection with a supplier's business relationship with Hansen and are encouraged to conduct regular training on data security.

In connection with any personal data or equivalent (as defined in the applicable data protection legislation) that is processed by a 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. Suppliers must have robust processes in place for managing data breaches and incidents, including processes for promptly notifying Hansen thereof.

### RAISING QUESTIONS AND REPORTING CONCERNS

We count on our suppliers to uphold our high ethical standards and business practices and, as such, run a successful business. To meet this expectation, we want to foster an environment where our suppliers feel comfortable raising concerns and getting help.

To encourage whistleblowers to come forward with their concerns and protect them when they do, the Corporations Act 2001 (Cth) gives certain people legal rights and protections as whistleblowers.

We encourage suppliers to use our Whistleblower Policy when concerns over conduct do not align with this Code. Hansen will treat all reports confidentially and anonymously in accordance with its policy.

Similarly, we expect suppliers to provide confidential means for their personnel to report any violations of this Code without fear of retaliation, and as such, expect complete cooperation with Hansen in the event of an investigation.

#### AUDIT RIGHTS AND SUPPLIER RISK ASSESSMENT QUESTIONNAIRE

In instances where Hansen has set out a possible audit right in an agreement with a supplier, Hansen may occasionally conduct audits to verify and assess compliance with this Code either directly or using a third-party auditor. In such instances, we expect suppliers to comply with all information requests and access to employees and premises as reasonably required in connection with such an audit.

If you are a new supplier for Hansen, we may require you to complete an initial Supplier Risk Assessment Questionnaire. Hansen may also request existing suppliers to provide new Supplier Risk Assessment Questionnaires occasionally to ensure that the information provided remains up-to-date and accurate.

#### **BREACH OF THIS CODE**

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

#### WHERE TO ACCESS THIS CODE

We understand that running a business is no easy feat. We thank you for your time in reading and acknowledging adherence to the Code. Should you need it, a copy of this Code is publicly available on the Hansen website. We encourage suppliers to read and understand this Code in conjunction with our <u>Human Rights</u> <u>Policy</u> and <u>Code of Conduct</u>, which can also be found on our website.

We encourage you to circulate this Code and related policies with your suppliers to ensure we continue doing business right, through our supply chains.

At Hansen, we believe a better future can only be achieved by promoting ethical behaviour. We understand that this requires 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.