

# Hana's Corporate Code of Conduct

January 1, 2024

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**we care™**

“We believe that reliability and integrity are at our core, but ultimately it is about loyalty. We respect our customers and value our suppliers, with the final goal of being a great place to work for everyone, a positive contributor to our community, and a relentless advocate for our environment and its natural resources. We commit ourselves to continuous improvement towards these ideals through creativity and proactive communication.

Because **we care**™”

## **Hana Technologies, Inc Corporate Code of Conduct**

Hana’s officers and employees conduct its affairs in compliance with external laws, internal rules, and societal standards. We approach all our business activities with integrity, fostering the trust of our customers and appreciation of our stakeholders and partnerships.

Hana has fashioned its Corporate Code of Conduct after the Responsible Business Alliance (RBA) Code of Conduct. We treat our business partners and workers with respect and dignity, ensure we operate safely and adhere to the highest ethical standards. We make every effort to be socially and environmentally responsible.

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# Labor

# 01

## 1.00

### Labor

**We facilitate and support the advancement and growth of our employees and give all employees the respect they deserve as individuals. We promote freely chosen employment and follow child labor laws.**

#### 1.01

##### Freely Chosen Employment

We do not use, nor support forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of any persons. As part of the hiring process, workers are provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work is voluntary, and workers are free to leave work at any time or terminate their employment. Hana Nor its agents may not hold or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government-issued identification, passports, or work permits, unless such holdings are required by law. Workers are not required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the workers.

#### 1.02

##### Young Workers/Child Labor

Child labor is forbidden in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) will not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

#### 1.03

##### Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Our working hours do not exceed the maximum set by local law. Further, our workweek is limited to no more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

#### 1.04

##### Wages and Benefits

Compensation paid to our workers complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers are compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure is not permitted. For each pay period, workers are provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

#### 1.05

##### Humane Treatment

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures shall be clearly defined and communicated to workers.

#### 1.06

##### Non-Discrimination

Hana is committed to a workforce free of harassment and unlawful discrimination. Hana will not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers will not be subjected to medical tests or physical exams that could be used in a discriminatory way.

#### 1.07

##### Freedom of Association

In conformance with local law, we respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

# Health and Safety

# 02

## 2.00

### Health and Safety

**Safety is one of the most important factors in our daily operations. Recognized management systems such as ISO45001 and ILO Guidelines on Occupational Health and Safety are useful sources for additional information. We provide a safe and healthy work environment which minimizes the incidence of work-related injury and illness, and enhances the quality of products and services, consistency of production and worker retention and morale. Ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.**

#### 2.01

##### Occupational Safety

Potential worker exposure to safety hazards (e.g., chemical, fire, and other hazards) are identified, assessed, and controlled through proper design, engineering, administrative controls, preventive maintenance, safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps are taken to remove or reduce any workplace health and safety risks to pregnant women and nursing mothers. Workers are encouraged to raise safety concerns.

#### 2.02

##### Emergency Preparedness

Potential emergency situations and events are identified and assessed. Their impact is minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed facility egress, and recovery plans. Our plans and procedures focus on minimiz-

ing harm to life, the environment and property.

#### 2.03

##### Occupational Injury and Illness

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness including provisions to encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

#### 2.04

##### Industrial Hygiene

Worker exposure to chemical, biological, and physical agents are identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are eliminated or controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are provided with and use appropriate, well-maintained, personal protective equipment. Protective programs include educational materials about the risks associated with these hazards.

#### 2.05

##### Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or potentially strenuous assembly tasks are identified, evaluated, and controlled.

#### 2.06

##### Machine Safeguarding

Production and other machinery is evaluated for safety hazards. Physical guards, interlocks and barriers are provided and properly maintained where machinery presents an injury hazard to workers. Lock out tag out is used when equipment is being repaired.

#### 2.07

##### Sanitation, Food and Housing

Workers are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Our facility is maintained to be clean and safe. Our facility maintains hot water for showering, adequate lighting, heating, cooling, and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

#### 2.08

##### Health and Safety Communication

Our workers are provided with appropriate workplace health and safety information and training in their primary language. Health and safety related information is clearly posted in the facility.

#### 2.09

##### Substance Free Workplace

We maintain a workplace free from illegal drugs and encourage our workforce to abstain from the illegal use, possession, sale or distribution of controlled substances or illegal substances.

# Environmental

# 03

### 3.00

#### Environmental

**Environmental responsibility is integral to producing world-class products. In manufacturing operations, adverse effects on the community, environment and natural resources are minimized while safeguarding the health and safety of the public. We recognize the fact that environmental issues impact everyone in common, we will strive to reduce our energy consumption through monitoring and reporting to make positive incremental changes. Recognized management systems such as ISO 14001, Eco Vadis, and the Eco Management and Audit System (EMAS) are useful sources for additional information.**

### 3.01

#### Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals and registrations are obtained, maintained, and kept current, and their operational and reporting requirements are followed.

### 3.02

#### Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are minimized or eliminated, and natural resources are conserved.

### 3.03

#### Hazardous Substances

Chemicals and other materials posing a hazard to humans, or the environment are identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

### 3.04

#### Solid Waste

We have implemented a systematic approach to identify, managing, reducing, and responsibly disposing of or recycling solid waste (non-hazardous).

### 3.05

#### Air Emissions

Air emissions monitoring is being evaluated for proper data collection and monitoring. Refer to the Appendix section for further commentary.

### 3.06

#### Material Restrictions

Hana adheres to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

### 3.07

#### Water Management

We have implemented a water manage-

ment program that documents, characterizes, and monitors water sources, use and discharge; seek opportunities to conserve water; and controls channels of contamination. All wastewater is characterized, monitored, controlled, and treated as required prior to discharge or disposal.

### 3.08

#### Energy Consumption and Greenhouse Gas Emissions

Energy consumption and greenhouse gas emissions monitoring is in process. Refer to the Appendix section for further commentary.

# Ethics

# 04

## 4.00

### Ethics

**To meet social responsibilities and to achieve success in the marketplace, Hana and our stakeholders uphold the highest standards of ethics. Hana is currently engaged with Eco Vadis and Responsible Business Alliance.**

## 4.01

### Business Integrity

Hana upholds the highest standards of integrity in all business interactions. We have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement.

## 4.02

### No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures are implemented to ensure compliance with anti-corruption laws.

## 4.03

### Disclosure of Information

All business dealings should be transparently performed and accurately reflected in business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is disclosed

in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

## 4.04

### Intellectual Property

Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information is safeguarded.

## 4.05

### Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are upheld.

## 4.06

### Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are maintained, unless prohibited by law. Hana does have a communication process for their personnel to be able to raise any concerns without fear of retaliation.

## 4.07

### Responsible Sourcing of Minerals

Hana has policies in place with our suppliers to reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of

serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Hana suppliers exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to us upon request.

## 4.08

### Privacy

Hana is committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Hana complies with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

# Management Systems

# 05

## 5.00

### Management Systems

Hana has established a management system whose scope is related to the content of this code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products; (b) conformance with this code; and (c) identification and mitigation of operational risks related to this code. It should also facilitate continual improvement. Our management system contains the following elements:

#### 5.01

##### Company Commitment

A corporate social and environmental responsibility policy statement affirming Hanas' commitment to compliance and continual improvement, endorsed by executive management, and posted in the facility in the local language.

#### 5.02

##### Management Accountability and Responsibility

Hana clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

#### 5.03

##### Legal and Customer Requirements

Hana maintains a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this code.

#### 5.04

##### Risk Assessment and Risk Management

We have a process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with our operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls

to control the identified risks and ensure regulatory compliance.

#### 5.05

##### Improvement Objectives

Written performance objectives, targets and implementation plans to improve Hana's social and environmental performance, including a periodic assessment of our performance in achieving those objectives.

#### 5.06

##### Training

Programs are in place for training managers and workers to implement policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

#### 5.07

##### Communications

Hana has an established process for communicating clear and accurate information about supplier's policies, practices, expectations and performance to workers, suppliers, and customers.

#### 5.08

##### Worker Feedback, Participation and Grievance

We have ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this code and to foster continuous improvement.

#### 5.09

##### Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this code and customer contractual requirements related to social and environmental responsibility.

#### 5.10

##### Corrective Action Process

A process for timely correction of defi-

ciencies identified by internal or external assessments, inspections, investigations, and reviews.

#### 5.11

##### Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

#### 5.12

##### Supplier Responsibility

A process to communicate the requirements of this code to suppliers and to monitor supplier compliance.

## APPENDIX

Hana has fashioned its Corporate Code of Conduct after the Responsible Business Alliance (RBA) Code of Conduct.

In sections that we have not provided details of environmental monitoring and emissions, be assured that we are gathering information and determining how to best implement systems with longevity and positive effects for our business, employees, and our community.

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