

## Code of Conduct for Business Partners

June 2024

### Introduction

At HennanGroup, we uphold a steadfast commitment to conducting our business operations with unwavering ethical standards and integrity. Central to this commitment is our Code of Conduct, which articulates clear expectations for all parties engaged in our business ecosystem, including subcontractors, suppliers, and vendors collectively referred to as "Business Partners". This Code serves as a guiding framework for fostering relationships built on mutual respect, transparency, and accountability.

Aligned with our core values, this Code applies universally to every entity and individual involved in providing goods or services to HennanGroup. It sets forth the principles and behaviors that we expect from our Business Partners, emphasizing compliance with legal requirements, ethical business practices, and responsible corporate citizenship.

By adhering to this Code, we reinforce our dedication to maintaining a business environment characterized by fairness, honesty, and trustworthiness. It is through collective adherence to these principles that we strive to achieve sustainable growth and contribute positively to the communities we serve.

### I. Business Integrity

*General Principles* Business Partners must operate in compliance with all applicable laws and regulations. They are expected to uphold honesty, fairness, and social responsibility in all business dealings.

*Conflicts of Interest* Business Partners must disclose and avoid conflicts of interest that may affect their relationship with HennanGroup.

*Anti-Corruption* Business Partners must adhere to anti-corruption laws, including the prohibition of bribery and unethical payments, such as those outlined in the Foreign Corrupt Practices Act (FCPA).

*Fair Competition* Business Partners shall maintain fair and competitive practices, avoiding collusion, price fixing, and other anti-competitive behaviors.

*Intellectual Property and Asset Protection* Business Partners must respect the confidentiality of information belonging to HennanGroup and protect its assets from misuse or theft.

## II. Management System

Business Partners are required to establish management systems that align with this Code of Conduct. They must educate their employees about these standards and ensure compliance.

## III. Labor and Human Rights

*Forced Labor and Child Labor* Business Partners must reject forced labor and child labor in all forms and comply with international standards and local laws regarding labor rights.

*Fair Working Conditions* Business Partners must provide fair wages and safe working conditions for their employees, complying with all relevant laws and regulations.

*Anti-Harassment and Discrimination* Business Partners must uphold a work environment free from discrimination, harassment, and retaliation, respecting all individuals' rights and identities.

## IV. Health and Safety

Business Partners must prioritize the health and safety of their employees, implementing measures to prevent workplace hazards and comply with occupational health and safety regulations.

## V. Environmental Protection

Business Partners must comply with environmental laws and regulations, minimizing their environmental impact and promoting sustainability in their operations.

## VI. Contractual Counterparties

Business Partners are expected to communicate these standards to their subcontractors and ensure their compliance.

### **Duty to Report**

Business Partners are required to report any misconduct or violations of this Code of Conduct to HennanGroup promptly.

## VII. Supply Chain Responsibility

*Responsible Sourcing* Business Partners must ensure the responsible procurement of goods and materials, adhering to applicable laws and regulations. They shall avoid sourcing from suppliers engaged in unethical practices or operating in conflict zones.

*Conflict Minerals* Business Partners must not procure minerals from conflict-affected regions, specifically tantalum, tin, tungsten, gold, or their derivatives, unless certified as conflict-free.

*Supplier Diversity* HennanGroup values supplier diversity and encourages Business Partners to promote diversity and inclusion in their supply chains, including minority-owned and women-owned businesses.

## VIII. Continuous Improvement and Reporting

*Performance Evaluation* Business Partners are expected to continuously improve their adherence to this Code of Conduct. HennanGroup may evaluate performance through audits, assessments, or other means to ensure ongoing compliance.

*Reporting and Transparency* Business Partners must promptly report any violations of this Code of Conduct or applicable laws to HennanGroup. They should maintain transparency in their operations and cooperate fully with investigations when required.

## IX. Dispute Resolution

Business Partners agree to resolve disputes with HennanGroup amicably and in accordance with contractual terms. In the event of a disagreement or breach, parties shall engage in good faith negotiations before seeking legal remedies.

## X. Compliance and Oversight

HennanGroup reserves the right to audit Business Partners' compliance with this Code of Conduct at any time. Business Partners shall cooperate fully with these audits, including providing access to relevant documents and personnel.

## XI. Data Security and Privacy

*Data Security* Business Partners must implement appropriate measures to safeguard HennanGroup's data and information systems from unauthorized access, use, or disclosure. This includes protecting against cybersecurity threats and ensuring the secure transmission and storage of sensitive data.

*Privacy Compliance* Business Partners must comply with all applicable data protection laws and regulations concerning the collection, use, and processing of personal information. They must obtain necessary consents and provide individuals with rights regarding their personal data in accordance with relevant privacy laws.

## XII. Ethical Marketing Practices

*Truthful Advertising and Marketing* Business Partners must engage in truthful and transparent advertising and marketing practices. They shall not engage in deceptive, misleading, or false advertising or promotion of their products or services.

*Respect for Customer Privacy* Business Partners must respect customer privacy preferences and comply with regulations regarding the use of customer data for marketing purposes. They shall obtain consent before using customer data and provide options for customers to opt-out of marketing communications.

## XIII. Community Engagement and Social Responsibility

*Community Impact* Business Partners are encouraged to contribute positively to the communities in which they operate. This includes supporting local charities, engaging in community service initiatives, and promoting sustainable development practices that benefit local residents.

*Social Responsibility* Business Partners must demonstrate a commitment to social responsibility by considering the impact of their operations on stakeholders, including employees, customers, suppliers, and the broader community. They should strive to enhance social well-being and economic development through their business activities.

## XIV. Innovation and Technology

*Innovation* Business Partners are encouraged to foster innovation in their products, services, and processes. They should invest in research and development to enhance efficiency, sustainability, and customer satisfaction while complying with intellectual property rights and ethical standards.

*Technology Adoption* Business Partners should embrace technological advancements that improve business operations and sustainability practices. They should prioritize cybersecurity measures to protect sensitive information and ensure the integrity of their digital infrastructure.



# Policy

## *Acknowledgment of HennanGroup's Code of Conduct for Business Partners*

I, on behalf of [Supplier name], acknowledge and agree to comply with HennanGroup's Code of Conduct for Business Partners. I ensure that our company and its employees understand and will abide by these standards.

*Authorized Signatory:* \_\_\_\_\_

*Name (printed):* \_\_\_\_\_

*Title:* \_\_\_\_\_

*Date:* \_\_\_\_\_