



SUPPLIER CODE OF CONDUCT

HAZEL 4D is fully aware of the responsibility we bear towards our customers, shareholders, employees and the communities in which we work. We have therefore given ourselves a strict set of ethical standards to guide us in our business dealings. The supplier shall comply with all laws applicable to its business.

The supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practice. We engage with suppliers that are committed to these same principles, and we set exacting standards for suppliers of goods and services for HAZEL 4D.

We expect all of our suppliers to adhere to the same ethical standards. For this purpose, HAZEL 4D has drawn up this Supplier Code of Conduct (SCoC), which sets the minimum standards for doing business with any group company or division. We also expect all suppliers of goods and services to HAZEL 4D to comply with the SCoC, even when this SCoC exceeds the requirements of applicable law.

IN OUR APPLICATION OF THESE STANDARDS, WE FOLLOW THESE KEY PRINCIPLES:

Inclusivity: Our standards apply to all workers regardless of race, colour, national origin, gender, gender identity, sexual orientation, religion, disability, age, political opinion, pregnancy, migrant status, ethnicity, caste, marital or family status, or similar personal characteristics. We are committed to addressing risks specific to these more vulnerable groups and working with our suppliers to evaluate and address circumstances that may arise but are not specifically covered by our Supplier Code.

Continuous improvement: HAZEL 4D operates a policy of continuous improvement, and we are committed to working with our suppliers to improve protections for their workers and workplace. We reserve the right to terminate a relationship at any time for failure to meet our SCoC. Termination will be considered when a supplier refuses to cooperate with an assessment, refuses to change a required behaviour or practice, does not make timely progress on remediation, or engages in falsification or misrepresentation of records or other illegal or deceitful activity.

Supply chain accountability: In order to ensure these standards are cascaded throughout our supply chain, we expect suppliers to consistently monitor and enforce these standards in their own operations and supply chain, as well as make improvements to meet or exceed our expectations and those of our customers as reflected in our SCoC. Suppliers are required to disclose any subcontractors or labour agents upon request. They are also expected to hold their subcontractors, and labour agents to the standards and practices covered by our SCoC. Suppliers with subcontracted production are required to work with their subcontractors to adopt and raise awareness of this SCoC. We recognize that suppliers in deeper tiers of the supply chain and suppliers in informal sectors may take more time to align with these standards.

HUMAN RIGHTS AND FAIR LABOUR PRACTICES

Child labour: The supplier shall not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it shall be 15 years. Workers under the age of 18 shall only perform work in accordance with legal requirements (e.g., with regards to working time and working conditions) and subject to any requirement regarding education or training and are passed the age of completion of compulsory education.

Forced labour: The supplier shall not use any form of forced, bonded or involuntary labour. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g., passports, work permits or any other personal legal documents). The supplier shall ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The supplier shall be responsible for payment of all fees and expenses (e.g., licenses and levies) relating to workers, where legally required. Workers must be free to leave work and terminate their employment or other work status with reasonable notice. All work must be voluntary. Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees for their employment either in their home country or the country where work is performed. Punishment, mental and/or physical coercion are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to the workers.

Migrant workers: HAZEL 4D expects our suppliers to pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face and ensure migrants workers are not discriminated against in respect to these standards. Our suppliers may only engage workers who have a legal right to work unless the workers are related to an approved program with refugee populations. If suppliers engage foreign or domestic migrant workers, such workers must be engaged in full compliance with the immigration and labour laws of the host country. Workers must be able to voluntarily terminate contracts without penalty upon reasonable or legally applicable notice. Suppliers are required to keep up-to-date records of all employees, particularly migrant workers; this includes the basic contract terms and the workers' arrival and departure dates.

Compensation and working hours: The supplier shall comply with all applicable national laws and mandatory industry standards regarding working hours, overtime, wages and benefits. The supplier shall pay workers in a timely manner (including overtime pay and benefits) and clearly convey the basis on which workers are being paid.

Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted. In addition, we encourage our suppliers to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their family.

HAZEL 4D expects suppliers to regularly monitor working hours to ensure the safety, health, and welfare of workers. Except in special or emergency situations,

i. suppliers are required to limit working hours to no more than 60 hours per week, including overtime.

ii. each worker must be entitled to at least one day off for every seven-day work period.

In all circumstances, working hours must not exceed the maximum amount permitted by law.

Diversity and Anti-Discrimination: The supplier shall promote an inclusive work environment that values the diversity of its employees. The supplier shall not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under law. Suppliers are required to make reasonable accommodations for workers of different religious backgrounds. We encourage our suppliers to provide maternity leave.

Fair treatment: All workers must be treated with respect and dignity. Our suppliers must not engage in or permit physical, verbal, or psychological abuse or coercion, including threats of violence, corporal punishment, mental coercion, sexual harassment, or unreasonable restrictions on entering or exiting work and residential facilities, or other forms of intimidation. We encourage suppliers to provide training on non-discrimination and harassment.

HEALTH & SAFETY

We expect our suppliers to strive to implement the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate for the business. The supplier shall comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses. Employees are to be adequately educated and trained in health and safety issues.

ENVIRONMENTAL AND SUSTAINABILITY

HAZEL 4D recognises the need for sustainable development and continually aims to improve the environmental effect of its activities. We expect our business partners to strive to support HAZEL 4D climate protection goals through the products and services they deliver (e.g., by providing relevant data on climate protection). In this regard, we also expect our suppliers to take climate protection appropriately into account in their own operations, for example by setting climate protection goals for themselves and achieving them. To achieve expect the Supplier will:

Establish sound environmental management by:

- Meeting or improving upon relevant legislative, regulatory and environmental codes of practice.
- Developing objectives that target environmental improvements and monitor performance by regular review.
- Considering any environmental issues in the decision-making process.
- Developing a relationship with suppliers and contractors so that we all recognise our environmental responsibilities.

Provide for the effective use of resources by:

- Promoting waste minimisation by recycling or finding other uses for by-products whenever economically viable.
- Promoting the efficient use of resources, energy and fuel throughout the organisation's operations.

Co-operate with:

- The communities in which we operate.
- The Government, regulatory bodies and other interested parties with the shared vision of being a good and trusted neighbour.

Suppliers are required to comply with applicable environmental laws; we encourage our suppliers to look for opportunities to go beyond regulatory compliance obligations and make progress towards integrating sustainable practices throughout their operations. Suppliers are required to obtain and keep current all required environmental permits, approvals, and registrations and follow applicable operational and reporting requirements.

Suppliers are required to effectively identify and manage the safe handling, movement, storage, and disposal of chemicals and substances that pose a threat to the environment, including providing workers with appropriate training on the safe handling and disposal of hazardous substances. Suppliers are also required to monitor and control wastewater or solid waste generated from operations before disposing of it in accordance with applicable laws.

CONFLICT MATERIALS AND LAND RIGHTS

Conflict Minerals. HAZEL 4D is committed to avoiding the use of minerals that have fuelled conflict in the Democratic Republic of the Congo or an adjoining country. We expect suppliers to support our effort to identify the origin of designated minerals used in our products.

Land Rights. It is important that our suppliers respect the legal land rights of individuals, indigenous people, and local communities. Upon HAZEL 4D's request, suppliers and producers are required to demonstrate a legal right to use the land.

BRIBERY AND CORRUPTION

The supplier shall comply with all national and international anti-bribery regulations as well as applicable anticorruption laws, including the United Kingdom Bribery Act, regulations and standards. The supplier shall not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business. The supplier must never bribe a government official on HAZEL 4D's behalf. Prohibited payments can take many forms including, but not limited to cash or cash equivalents, gifts, meals, and entertainment. Our suppliers must not induce HAZEL 4D employees to violate our Anti-bribery and Anti-corruption policy.

TRADE REGULATION

The supplier shall comply with all applicable trade and import regulations including sanctions and embargoes that apply to their activities.

MONEY LAUNDERING & FINANCIAL RECORDS

The supplier shall comply with applicable laws and regulations designed to combat money laundering activities. The supplier shall maintain financial records and reports according to international laws and regulations.

FAIR COMPETITION

The supplier shall comply with applicable competition and anti-trust laws.

GRIEVANCE AND WHISTLEBLOWER PROTECTIONS.

HAZEL 4D expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.

BUSINESS CONTINUITY PLANNING

The supplier shall be prepared for any disruptions of its business (e.g., natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases). This preparedness especially includes disaster plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations identified risks and ensure regulatory compliance. Suppliers are required to consistently monitor and enforce these standards in their own operations, supply chain, and subcontractors, and should make improvements to meet or exceed our expectations and those of our customers as reflected in our Supplier Code.

DATA PROTECTION AND DISCLOSURE OF INFORMATION

The supplier shall adhere to relevant data protection and security laws as well as to respective regulations, in particular with regard to personal data of customers, consumers, employees and shareholders. The supplier shall comply with all said requirements when personal data is collected, processed, transmitted or used. All facilities must maintain a valid business license. Suppliers are responsible for reviewing and complying with all legal requirements, and have available required permits, licensees (e.g., health and safety permits, occupancy permits, etc.) necessary to operate. Suppliers shall safeguard and make only appropriate use of confidential information. The supplier shall not disclose any information that is not known to the general public.

CONFLICTS OF INTEREST

A conflict of interest arises when an individual has a private/personal interest which could appear to influence their decisions. Such conflict-of-interest situations include a relationship by blood or marriage, partnership, business partnership or investment. The supplier shall disclose any actual or potential conflict of interest with HAZEL 4D personnel.

COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

HAZEL 4D reserves the right, upon reasonable notice, to check compliance with the requirements of the SCoC. HAZEL 4D encourages its suppliers to implement their own binding guidelines for ethical behaviour. The supplier shall encourage its own suppliers to adhere to this SCoC as part of fulfilling their contractual obligations. Any breach of the obligations stipulated in this SCoC is considered a material breach of contract by the supplier.

Last Update **April 2022**