

HARRINGTON INDUSTRIES GLOBAL CODE OF CONDUCT

HIT-4.23

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Revision 1

Our Commitment

- ▶ Harrington Industries is dedicated to conducting our business with the highest standards of business ethics. We have an obligation to be honest, fair and forthright in all of our business activities. Our Global Code of Conduct (“Code”) sets forth our business policy including our expectations for our suppliers, advisors and other third parties.

► Labour and Human Rights

- We aim to ensure that all employees are treated with dignity and respect including:
 - Not engaging in the use of child labour as defined by international and national laws, whichever standard is higher.
 - Complying with local and national laws and regulations pertaining to wages, overtime and benefits.
 - Ensuring that working hours comply with national laws.
 - Respecting the right of employees to freedom of association, freedom of expression, the right to be heard.
 - Any form of Harassment and/or Discrimination are unacceptable. Any Harassment and/or Discrimination on the basis of race, color, religion, age, gender, national origin, marital status, sexual orientation, disability or other legally protected status will not be tolerated.
 - Workplace bullying is likewise unacceptable. Bullying is defined as a pattern of offensive conduct (including electronically transmitted acts – i.e., cyberbullying, using social media, internet, mobile phone, etc.) that targets individual(s) and threatens, humiliates, or intimidates. It can cause a reasonable person in the victim's position substantial emotional distress and undermine his/ her/their ability to work.
 - We use an Ethical Recruiting Policy of hiring workers lawfully and in a fair and transparent manner that respects and protects their rights.
 - We do not engage in Forced evictions as they constitute gross violations of a range of internationally recognized human rights, including the human rights to adequate housing, food, land, forest, water, health, education, work, security of the person, freedom from cruel, inhuman and degrading treatment, and freedom of movement.
 - We do not use private or public security forces in a manner which may impinge on any of the above human rights.

► **Health and Safety**

- We provide a safe, hygienic and secure work environment to prevent accidents and injury. A safe and secure work environment also means a workplace safe from illegal drugs and violence.
- Workers must have access to clean and safe accommodations, toilet facilities, potable water and food storage facilities.
- Health and safety policies and regular training must be provided, implemented and recorded.

► **Environmental Impacts**

- We comply with national and local legal obligations to manage the impact of their business on the environment. We work to continuously reduce their environmental impact by:
 - Complying with applicable environmental laws and regulations.
 - Implementing a system to manage and reduce environmental impacts.
 - Obtaining all required environmental permits and licenses.
 - Refer to our specific Energy Management Policy, water consumption, water quality, water management policy, Air Quality policy, responsible chemical management policy, sustainable resources management policy, Reuse and Recycle policy and Soil Quality Policy for further information.

► **Anti-Bribery and Corruption**

- We act in compliance with laws, regulations and industry standards applicable to the countries where we conduct business.

- We aim to ensure that our employees, affiliates and agents do not offer or pay money or anything of value to any government official or political candidate for the purpose of obtaining, retaining or directing business to any person or entity, as prohibited by applicable local and international laws.
- **Conflicts of Interest**
Employees must be free of conflicts of interest that jeopardize their ability to take actions in the best interest of the Company. A “conflict of interest” occurs when an employee conducts a business activity for his or her personal benefit or the benefit of a family member or friend. We expect employees to immediately disclose any actual or potential conflicts of interest to Upper Management to ensure fair and prompt resolution.

► **Fair Competition**

- We follow all applicable antitrust and competition laws by:
 - Never engaging in unfair business practices and never sharing confidential information such as bids, proposals or strategies with competitors.
 - Never discussing, coordinating, or agreeing with competitors to fix prices or engage in business practices which are construed by Anti-Trust Authorities as having the purpose or effect of diminishing free competition.
 - Never taking part in discussions or arrangements that may be perceived as anti-competitive.

- **Sanctions and International Trade**

We comply with all applicable sanctions and international trade laws and regulations with regard to imports, exports, and international financial transactions.

- We do not contract with vendors in any embargoed and sanctioned countries.
- If Third Parties' products are subject to the U.S. Export Administration Regulations, then they must ensure the product has been screened against the Commerce and Treasury Department's lists before exports are provided to that.
- We comply with conflict minerals legislation associated with sourcing tin, tantalum, tungsten and gold from the Democratic Republic of the Congo and adjoining countries, including but not limited to the Dodd-Frank Wall Street Reform and Consumer Protection Act. We provide reasonable assistance to Customers in responding to all requests relating to compliance with conflict minerals legislation.
- We comply with modern slavery legislation including but not limited to the California Transparency in Supply Chains Act of 2010, the United Kingdom's Modern Slavery Act 2015, and Australia's Modern Slavery Act 2018 (together the "Slavery Acts"). We provide reasonable assistance to Customers in responding to all requests relating to compliance with modern slavery legislation.
- We do not use slavery or human trafficking in any of Our supply chains, or in any part of Our own business.

► **Confidentiality**

Employees must keep Our company's and Our customer's non-public information confidential.

- Our company's and Our customer's confidential information that must be protected includes, but is not limited to, nonpublic information that might be of use to competitors, or would be harmful to Our company or Our customers if disclosed.
- Our customer's confidential information should never be disclosed unless authorized in writing by Our customer or legally required.
- Any authorized disclosure of Our customer's confidential information should be subject to a confidentiality agreement requiring the other party to keep the information confidential once disclosed.

■ **Privacy**

We have an ethical and legal obligation to protect personal information (including, but not limited to, patient information) by:

- Complying with all applicable privacy and data security laws,
- Taking appropriate steps to safeguard any personal information received from Our customers against unauthorized or unlawful use, disclosure, access, loss, alteration, damage and destruction.
- This includes the encryption or anonymization of any health data that is transmitted externally. Immediately reporting to Our customers any public disclosure of personal information, or any attempt by an outsider to "hack" or steal personal information .