

Code of Conduct for Contractors, Subcontractors and Suppliers-2023-01-10

HEC Jsc is committed to ethical principles and place great value on integrity and compliance with the applicable laws and regulations. We expect our business partners to follow at least similar standards in their behaviour.

Each contractor, subcontractor and supplier is expected to adhere to a high standard of ethical conduct. The reputation and good standing of the Company depend on how the Company's business is conducted and how the public perceives that conduct. Unethical actions, or the appearance of unethical actions, are not acceptable. In addition to each of the directives set forth below, each contractor, subcontractor and supplier shall be guided by the following principles in carrying out their duties and responsibilities on behalf of the Company:

- **Loyalty, Honesty and Integrity:** contractor, subcontractor and supplier must not be, or appear to be, subject to influences, interests, or relationships that conflict with the best interests of the Company.
- **Observance of Ethical Standards:** When providing services to the Company, contractor, subcontractor and supplier must adhere to the high ethical standards described in this Code.
- **Accountability:** contractor, subcontractor and supplier are responsible for their own adherence and the adherence of any of their employees or agents who may provide services to the Company; such individuals should familiarize themselves with each provision of the Code.
- **Adherence to the Law:** When providing services to the Company, contractor, subcontractor and supplier must comply with all applicable laws.

Our expectations are set out in the following statement - an integral part of the agreements (such as framework agreement, supply agreement, procurement order, agreement for services or temporary employment agreement) that have been or will be agreed upon with HEC Jsc.

Professionalism

Contractors, subcontractors and suppliers shall at all times act in accordance with the applicable laws and regulations and the principles, standards and values that apply at HEC Jsc and shall avoid damaging the name and reputation of HEC Jsc through their statements and actions, both at the project sites and elsewhere. Contractors, subcontractors and suppliers should provide high-quality products and services and are expected to record transactions in accordance with applicable procedures and to handle information with care.

Safety

Contractors, subcontractors and suppliers must comply with the health and safety regulations applicable, as also described in the HSEQ Procurement Conditions. These HSEQ Procurement Conditions and are considered an integral part of the Code of Conduct. Any updates of HSEQ Procurement Conditions shall follow applicable legislation in an appropriate manner, and HEC Jsc expects its contractors, subcontractors and suppliers to accept such amendments, if any.

HEC Jsc expects contractors, subcontractors and suppliers to be mindful of our and their own safety as well as that of others. Contractors, subcontractors and suppliers are expected to make every effort to report unsafe situations and resolve them immediately.

In particular, contractors, subcontractors and suppliers must comply with the safety requirements concerning own PPE's, tools and machines, as also included in the HSEQ Procurement Conditions, in order to ensure their own safety and the safety of others.

Environmental Sustainability

HEC Jsc expects contractors, subcontractors and suppliers to comply with all local environmental regulations and rules and to prevent damage to the environment and surroundings at all times. Contractors, subcontractors and suppliers of HEC Jsc are required to comply with the principles of the Global Impact Initiatives, as well as the minimum standards included in this Code of Conduct for Contractors, Subcontractors and Suppliers (Code of Conduct), and to also impose these in writing on their subcontractors and suppliers, if any.

HEC Jsc recognizes the importance of protecting the natural environment and our shared responsibility in addressing critical environmental issues facing the planet. HEC Jsc reserves the right to request information from its contractors and vendors regarding their own environmental practices, as well as encourages its contractors, subcontractors and suppliers to keep it informed about available products or services that might help the HEC Jsc to reduce its environmental impacts

Integrity

HEC Jsc expects contractors, subcontractors and suppliers to keep business and private interests separate, avoiding any appearance of a conflict of interest. Gifts and gratuities, both internal and from third parties, may never influence the decision-making process. Contractors, subcontractors and suppliers are expected to act in good faith at all times and abuse of power is not be permitted under any circumstances.

Combatting prohibited agreements

Contractors, subcontractors and suppliers shall not engage in illegal trade restrictions, anti-competitive agreements, abuse of economic power or cartels. Furthermore, contractors, subcontractors and suppliers shall comply with the applicable legal provisions concerning the employment of employees and take decisive action against illegal employment and undeclared work.

Contractors, subcontractors and suppliers shall not engage in any conduct that would put the HEC Jsc organisation at risk of violating anti-bribery laws.

Corruption and bribery

Contractors, subcontractors and suppliers shall in no way commit direct or indirect acts of corruption, including extortion, fraud and/or bribery. Contractors, subcontractors and suppliers are obliged to comply with all relevant anti-corruption and anti-bribery laws and regulations.

Respect and Discrimination

Contractors, subcontractors and suppliers should create a working environment in which everyone feels comfortable and approaches each other with fairness and dignity. In this working environment, everyone should be accepted as he or she is. In no way will a contractor, subcontractor or supplier discriminate or act in a discriminatory manner in the hiring and employment of personnel, nor in the granting of employment-related benefits, including but not limited to compensation, access to education and training and termination of contracts.

Contractors, subcontractors and suppliers must respect the diversity of their employees, customers and others with whom they come into contact, including respect for differences such as gender, race, colour, age, disability, sexual orientation, ethnic origin and religion.

Employment practices

Contractors, subcontractors and suppliers shall comply with applicable employment standards and legislation on employment standards, non-discrimination and human rights.

Contractors, subcontractors and suppliers shall respect the right of employees to join or refrain from joining associations and workers' organisations.

Contractors, subcontractors and suppliers must be able to demonstrate at their workplace that:

- no child labour is used;
- discrimination and harassment are prohibited, including discrimination or harassment based on a characteristic protected by law;
- employees are free to raise concerns and speak up without fear of retaliation;
- appropriate and reasonable background screening, including investigation of previous criminal activities, is conducted to ensure the integrity and good character of the supplier's employees;
- clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements.

Privacy and information security

Contractors, subcontractors and suppliers must comply with the applicable laws, rules and regulations of the jurisdictions in which they operate with regard to privacy and information security, and may only use information obtained through their relationship with HEC Jsc to the extent strictly necessary for the performance of the work.

Contractors, subcontractors and suppliers must have appropriate information security policies and procedures in place to protect access to HEC Jsc information.

Contractors, subcontractors and suppliers should inform HEC Jsc immediately about actual or suspected breaches of privacy, security breaches or loss of HEC Jsc information.

Contractors, subcontractors and suppliers must keep all information about HEC Jsc, the contracted services and the performance of the services confidential.

Corporate Opportunities

Contractors, subcontractors and suppliers are prohibited from taking (or directing to a third party) a business opportunity that is discovered through the use of the HEC's property or information, unless the Company has already been offered the opportunity and turned it down.

Resumption of business operations and emergency planning

For some services performed by contractors, subcontractors and suppliers, due to the importance to our operations or the types of operations that may be involved, HEC Jsc expects that for business continuity of the contractors, subcontractors and suppliers emergency



recovery plans are developed, maintained and tested in accordance with applicable legal, contractual and service level requirements.

Audit

HEC Jsc is entitled to conduct an audit of contractors, subcontractors and suppliers to verify compliance with the Code of Conduct. If HEC Jsc is of the opinion that the contractor, subcontractor and/or supplier does not comply with the provisions of this Code of Conduct, HEC Jsc shall be entitled to terminate the agreement with the contractor, subcontractor and/or supplier.

Whistleblower scheme

Contractors, subcontractors and suppliers are encouraged to report incidents or practices which they believe are inappropriate or unethical to any officer of HEC Jsc at any time. In addition, Contractors, subcontractors and suppliers may report through the Alertline website, which is maintained by a third-party compliance service provider to document concerns with regard to unethical or questionable accounting and business matters.

For reports of violations of the Code of Conduct, you may contact the confidential advisor of HEC Jsc. If desired, these reports can also be made anonymously.

The confidential advisor of HEC Jsc can be contacted via web: www.hec.global mail: contact@hec.global

Contractors, subcontractors and suppliers are obliged to investigate suspicious cases and to cooperate with HEC Jsc without reservation. If there is reasonable suspicion that a contractor, subcontractor or supplier has violated the Code of Conduct, or if a subcontractor or supplier in the event of suspicion fails to fully comply with its obligation to investigate and cooperate, HEC Jsc may terminate the business relationship with the relevant contractor, subcontractor or supplier with immediate effect on the basis of the existing contractual or statutory rights. In the event of violation of the Code of Conduct, HEC Jsc reserves the right to take further legal action, in particular to claim compensation.

By signing, the contractor, subcontractor and/or supplier declares to have received the Code of Conduct and to comply with the obligations, in addition to the other contractual obligations with HEC Jsc.

ACKNOWLEDGEMENT AND AGREEMENT

I have read and understand the HEC Jsc Code of Business Conduct and Ethics for Contractors and Vendors, and I agree to abide by it during the term of my contractual relationship with the Company.

Place and date :

Name (in block capitals), position

Signature contractor/subcontractor/supplier

Company stamp