

## Supplier Code Of Conduct

### Commitment

Hawsons Iron Limited (**Hawsons**) is committed to conducting business in an ethical and sustainable manner in alignment with our core values of Teamwork, Safety and Responsibility, Accountability, Respect, Innovation, and Integrity. This extends to our suppliers, who are vital contributors to Hawsons' business. Hawsons seeks to utilise its supply chain and procurement approach to maximise its positive impact on local, regional, and national economies.

### Scope and Purpose

The Supplier Code of Conduct (**Code of Conduct**) outlines Hawsons business and ethical standards as per the Hawsons Values. This Code of Conduct is intended to govern the conduct of Hawsons Iron Limited's suppliers and subcontractors, by setting standards they must follow and against which they will be assessed as part of Hawsons vendor due diligence process.

Suppliers play a key role in the delivery of Hawsons' strategy. Hawsons requires our suppliers to demonstrate at all times their alignment with the Hawsons Values. We expect our suppliers to be accountable for their actions and the actions of their supply chains. Our suppliers must regularly review their supply chains (including any suppliers that manufacture, transport or install goods or services into our operations) to ensure compliance with the Hawsons Values and this Code of Conduct. We expect suppliers maintain sound business ethics, respect internally recognised labour standards and human rights obligations and adopt principles of sustainability into their operations where practical.

Any individual or entity that provides goods and/or services to or on behalf of Hawsons, either directly or as a subcontractor, is considered a "supplier" for the purpose of this Code of Conduct. Transactions involving land purchases, leases, royalties, government agencies, utilities, other Hawsons entities, financial institutions, joint venture partners and other mining companies are not considered to involve suppliers for the purpose of this Code of Conduct.

### Expectations

To achieve the Company's expectations, suppliers shall ensure they conduct their business at all times in alignment with the following:

#### ***Health and Safety***

Hawsons places the highest priority on health, safety and wellbeing. Suppliers must comply with all site-specific health and safety procedures when working on Hawsons sites. Hawsons' suppliers must implement their own safety management systems and provide appropriate training, resources, and personal protection equipment to ensure occupational hazards are minimised. Suppliers must maintain records, notify reportable incidents, and deliver continual improvement through preventative measures including safety interactions and audits, review and reporting of incidents and maintenance with regular review of applicable statutory requirements.

#### ***Human Rights and Modern Slavery***

Suppliers must comply with international human rights legislation and standards. More specifically, suppliers must abide by Hawsons Human Rights and Modern Slavery policies.

#### ***Labour Rights***

Hawsons requires all suppliers to respect the labour legislation of the country in which they operate and comply with any international labour organisation standards where applicable. Suppliers must respect workers' rights to safe working conditions, fair remuneration, work time and prohibit the use of child labour in all forms and any other forms of Modern Slavery. All suppliers must at all times comply with relevant labour legislations and Hawsons' policy on Modern Slavery.

Suppliers will be asked to provide detailed supply chain information and to declare any identified or perceived labour concerns or breaches of Modern Slavery in their supply chain.

#### ***Environmental Performance***

Hawsons respects the natural environment and cares for natural habitats, resources, and climate. Hawsons Iron Limited believes having the highest environmental management standards and practises will enable us to eliminate or minimise our impacts on the environment and society, guided by our risk management framework.

Hawsons' suppliers must abide by all applicable environmental laws, local and international standards and by using best industry practices, to reduce their impact on the environment.

#### ***Anti-Bribery and Corruption***

Hawsons will not tolerate bribery and corruption and is committed to doing ethical business conduct and doing business with ethical agents and business partners. Suppliers must comply with all relevant legislation, the Hawsons' Anti-bribery and Corruption Policy along with relevant provisions within the supply contract. Additionally, suppliers must report to Hawsons Iron any suspected violations of the above-mentioned obligations and standards.

#### ***Sustainable Community and Engagement***

Hawsons commitment to acting in a socially responsible way includes supporting local suppliers and institutions as an important part of contributing to sustainable community and engagement. Hawsons is committed to supporting and building strong relationships with local suppliers that will create sustainable capital for the region.

Suppliers should endeavour to employ a local workforce, goods, and services while continuing to assess and mitigate any negative impacts their work may have on local communities and individuals.

Suppliers must comply with Hawsons Sustainable Procurement Policy.

#### **Compliance and Due Diligence**

Suppliers must comply with all relevant laws and regulations in all the jurisdictions in which they carry out activity with, or on behalf of Hawsons, as well as with their contractual obligations within the supply contract. Where the laws in force in certain countries are less stringent than the standards in this Code of Conduct, then the suppliers must comply with this Code of Conduct.

Hawsons has a responsibility to conduct due diligence on its suppliers including having suppliers complete and an environmental and social risk assessment, address any improvement opportunities and agree to this Code of Conduct. Hawsons reserves the right to carry out regular assessments of its suppliers such as through self-assessment questionnaires and request for additional information.

Hawsons requires that suppliers will:

- Respond in full and be open and honest in response to any requests for information;
- Self-monitor their compliance with the Code of Conduct and inform us of any non-compliance; and
- Agree and complete an improvement plan to address any breach or shortcomings.

If a supplier is unable or unwilling to meet Hawsons' minimum standards, Hawson may end the relationship, subject to contractual obligations.



**POLICIES AND STANDARDS**

Hawsons has adopted several policies and statements available at <https://hawsons.com.au/corporate-governance/> which we expect suppliers to comply with:

- Anti-bribery and Corruption Policy
- Code of Conduct
- Environmental Sustainability Policy
- Health, Safety and Wellbeing Policy
- Human Rights
- Modern Slavery Statement
- Sustainable Procurement Policy

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Name and position	Signature	Date