

CODE OF CONDUCT FOR SUPPLIERS

By Board of Directors

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Dear Valued Hana Suppliers,

Hana promotes the win-win relationships with our suppliers as our business partners. We expect our suppliers, contractors, sub-contractors, service providers, forwarders, agents and other goods and service providers to conduct themselves with the utmost fairness and responsibility in all aspects of their business.

The Supplier Code of Conduct herewith presented by Hana Group sets forth our expectation of our partners with whom Hana conducts business with respect, transparent and responsible ethical, social and environmental practices.

Suppliers should take all reasonable measures to communicate and comply with the principles of this Code of Conduct throughout their supply chain. In addition, Hana's Supplier Code of Conduct encourages suppliers to go beyond legal compliance and our basic requirements to further advance suppliers' sustainable performance.

Mr. John Thompson Chairman of the Board of Directors

1. PURPOSES

The Company has developed the Supplier Code of Conduct to express our commitment to ethical standards and to clearly convey to all current and future suppliers of the Company's expectations of ethical conduct as it pertains to their business relationship with HANA.

2. SCOPES

This policy applies to all vendors, suppliers, contractors, sub-contractors, consultants, service providers, forwarders, agents and other providers of goods and services (our "suppliers").

3. POLICY

3.1 Code of Conduct for suppliers

Confidentiality: Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights. All data, including but not limited to, drawings, photographs, estimates, plans, reports that have been compiled by or received by the Supplier shall be the property of HANA and shall be treated as confidential. Suppliers shall not disclose the information to others except on a strict "need to know" or "need to use" basis, not to disclose this information to persons outside of the supplier's organization and not to use this information for the supplier's own benefit or the benefit of any other person.

Fair Business with Competition: Standards of fair business and competition are to be upheld. Hana seeks to purchase goods and services for better price, better quality and delivery performance. Suppliers shall not obtain the business involved with any abuse or exploitation of any persons. Bribes or other means of obtaining undue or improper advantage including bid rigging are not to be offered or accepted at any time.

Commitment to anti-corruption: Hana has a zero tolerance of bribery and corruption. Direct or indirect bribery such as offering or accepting any form of payment or promise, or offering or accepting items of value of any kind, with the aim of receiving or maintaining business or achieving a business advantage, is expressly forbidden. Any and all forms of corruption and bribery are strictly prohibited resulting in immediate termination and legal actions.

Gift and Hospitality Policy: Whilst the exchange of gifts and hospitality can build goodwill in business relationships, suppliers must ensure that gifts and hospitality should not be used to obtain undue advantages or as subterfuge for illegal transactions.

Sponsorship and donations: Suppliers shall perform charitable contributions and may offer sponsorship for the purposes of corporate social responsibility and not for a subterfuge for bribery. Charitable donations and sponsorships must not be perceived as being given for improper purposes. When a charitable contribution or sponsorship is made, it shall be transparent and in accordance with applicable laws.

Hiring Government Employee (Revolving Door): Suppliers shall not hire a former and current government official/officer or allow any employee of suppliers to work with the government official that may cause the conflict of interest between the individual roles in both the organization and the government.

Political contributions: Suppliers shall maintain the principle of political impartiality and compliance with laws and democracy in all the countries where they operate. Suppliers shall respect everyone the right to engage in political activities. Suppliers are expected not make any political contributions directly and indirectly for the purpose of influencing public officials and to obtain or retain business or other advantages for their benefits and/or take such actions in support of or opposition to a political party.

Conflict of interest: Suppliers are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers are expected to provide notification to all concerned parties in the event that an actual or potential conflict of interest arises or may arise.

Compliance with laws: Suppliers shall comply fully with all laws and regulations applicable to them.

Social and environment sustainability: Suppliers shall comply with all applicable environmental laws and regulations and should endeavor to make continuous improvements in environmental performance through practicable measures and employ leading practices where possible.

Human right: Suppliers are expected to treat people engaged in the course of doing business with dignity and respect in the basic rights as follows:

- Freedom from forced labor, compulsory labor, and human trafficking: Suppliers shall not use forced or compulsory labor, slavery or servitude or engage in human trafficking.
- Child Labor: Suppliers shall employ only workers who meet the applicable minimum legal age requirement
- Wages and benefits: Suppliers shall set working hours, wages and overtime pay in compliance with all applicable laws including legally mandated benefits. Workers shall be paid at least the minimum legal wage.
- **Discrimination:** Suppliers shall employ workers on the basis of their ability to do the job, not on the basis of their race, color, gender, nationality, religion, age, maternity or marital status
- **Freedom of Association:** Suppliers' workers are free to join associations of their own choosing, and have the freedom.

• **Health and safety and working conditions:** Suppliers shall provide a workplace that is free from safety or health hazards or will control such hazards to acceptable levels.

3.2 Compliance and Monitoring

The supplier is fully responsible for ensuring compliance and their sub-contractor(s) as if it were the supplier itself. Hana reserves the right to audit the supplier or supplier's subcontractors for compliance to Hana's Supplier Code of Conduct. However, Hana expects that suppliers will actively review and monitor their day-to-day management processes with respect to Hana Code of Conduct.

3.3 Event of Violation

If the supplier does not comply with this Hana's Supplier Code of Conduct, Hana may terminate the business relationship, including suspending placement of future orders and potential stopping the payment which is depending on the degree of violation and situation.