

Supplier Code of Conduct

Hastings Technology Metals Ltd (**Hastings** or the **Company**) recognises the importance of maintaining a robust and responsible sourcing program to ensure it can operate in an efficient and ethical manner. Hastings relies on contractors, sub-contractors, consultants, agents, manufacturers and others working to and on behalf of the company to provide goods and services to our operations (collectively referred to as **Suppliers**). The Company seeks to ensure its Suppliers and their employees act in accordance with industry developments, ethical expectations and prevailing Company policies and procedures.

Hastings has implemented this Supplier Code of Conduct (**Code**) to ensure our commitment to maintain compliance to its ethical standards are shared with, and implemented by, our Suppliers. This commitment reflects our key values of integrity, openness, and accountability.

Requirements

Suppliers shall, at all times, comply with relevant laws and regulations in the country where the supplier operates, and applicable Hastings' policies and procedures as amended from time to time.

A detailed list of minimum Company requirements is set out in Schedule 1.

Workplace

Hastings expects the following commitment from its Suppliers:

Responsibility	Accountable for their own actions
Attitude	Display a positive, thoughtful and resilient attitude
Results	Focus on delivering results on time and on budget
Empowerment	Empower people to perform at their best, address risks and challenge the status quo
Ethics	Act honestly, with integrity and ethically

All suppliers are expected to provide an equal opportunity workplace, free from discrimination and harassment, in which all persons are treated fairly and respectfully regardless of gender, race, culture, disability, or other diversity factors.

Reporting

Hastings may at any time review or audit a supplier's performance against this Code. This may include requesting evidence from a Supplier to demonstrate how they are meeting the above requirements, or completion of supplier self-assessments (Supplier Questionnaires).

Compliance with this Code of Conduct

Non-compliance by the Supplier with this Supplier Code of Conduct will be regarded as a serious violation of the contractual obligations by Hastings. In the event a Supplier is suspected of violating any of Hastings policies and/or the expectations set out in this document, Hastings reserves the right to request disclosure of all relevant information from that Supplier. Hastings reserves the right to terminate business with any Supplier who it considers to be in violation of this Supplier Code of Conduct or any other Company policy. Such a violation can extend to include Suppliers who fail to implement adequate measures to improve their performance or to correct identified non-compliances by the Company.

We expect all suppliers to communicate the substance of this Code to their personnel, related entities, suppliers, agents and subcontractors and support them in understanding and complying with this Code by maintaining appropriate policies and procedures.

If a supplier becomes aware or suspects a breach of this Code, the supplier must inform its Hastings representative or alternatively can report the matter using Hastings' external independent [whistleblower service](#).

This Policy will be reviewed every two years or as required.



Charles Lew

Executive Chairman

Approved by the Board (20 September 2023)

Schedule 1

Compliance	Requirements	Relevant Policy
Business Integrity		
Conduct	When working for or on behalf of Hastings, Suppliers must act honestly, with integrity and ethically, act in the best interests of Hastings.	Code of Conduct
Bribery and corruption	Hastings prohibits bribery and corruption by its Suppliers. Suppliers must not influence Hastings employees in order to gain unfair advantage in any business transactions. The Supplier must not offer any bribes, kickbacks, gifts, entertainment, payment, gratuities, or any other benefit (collectively referred to as 'Benefits' where the Benefit is being provided to obtain or retain business, to influence decision making or otherwise retain a business advantage that is not legitimately due. Any gifts to Hastings employees or related parties, if any, must be of low financial value (<\$100 in Australia) and reflect local business custom. The Supplier must not make or allow facilitation payments to government officials within Australia or internationally when undertaking work for or on behalf of Hastings.	Anti-Bribery and Corruption Policy
Conflicts of interest	Hastings expects Suppliers to avoid situations where their interests conflict with those of Hastings interests. Suppliers are also expected to disclose and deal appropriately with any conflicts of interest. This also applies to family members and other parties.	
Trade	Where appropriate, the Supplier must comply with all international trade laws and sanctions of the countries in which it operates.	
Money Laundering	The Supplier must not participate in any money laundering activities. The Supplier must comply with laws and regulations for the prevention of money laundering activities.	
Unrestricted competition	Hastings expects our suppliers to comply with applicable antitrust laws and regulations. We expect our Suppliers to compete fairly, not to enter into agreements with competitors that might constitute a breach of antitrust law, and not take advantage of their dominance in the marketplace.	
Labour and Human Rights		
Fundamental rights	Hastings expects its Suppliers to treat its employees with dignity, courtesy, respect, in a fair and equitable manner, and ensure the fundamental rights and labour standards of the International Labor Organisation (ILO; Labour standards (ilo.org)) are enforced while taking account of the applicable laws and regulations of the respective country.	Human Rights Policy
Child labour	Suppliers and third parties must prohibit child labour of any kind.	Code of Conduct
Discrimination	Suppliers must prohibit any form of discrimination including sexual harassment.	Fitness for Work Policy
Forced labour	Suppliers must prohibit any form of forced labour or modern slavery.	Inclusion and Diversity Policy
Freedom of association	Suppliers shall respect the right of their employees to form a workers representative group or collective bargaining unit in accordance with applicable laws and regulations of that country.	
Labour conditions	Suppliers shall ensure the work hours for employees comply	

	with relevant labour laws and regulations of the country in which they operate. Suppliers shall ensure their employees receive remuneration that is consistent with the applicable country	
Grievances	Suppliers shall have grievance mechanisms in place for its employees, contractors, and external stakeholders, and have fair and equitable processes in place to address the respective grievance, maintaining confidentiality while protecting the person from any form of discrimination because of lodging the complaint.	

Compliance	Requirements	Relevant Policy
Community		
Indigenous Rights	The Supplier shall respect the rights and roles of indigenous people in accordance with the <i>United Nations Declaration of the Rights of Indigenous Peoples</i>	Indigenous Rights Policy
Indigenous People: Employment and contract opportunities	The Supplier shall promote socio-economic benefits including employment and contractor opportunities for Indigenous people for services on facilities under Hastings operational control as a minimum requirement	
Communication principles	Hastings expects its Suppliers to adopt the following principles for engagement with Hastings communities and stakeholders: <ul style="list-style-type: none"> • Open and effective communication; • Transparency; • Collaboration; • Inclusiveness; and • Integrity. 	Community Policy
Local content	Suppliers who operate in Australia are expected to employ Australian citizens and engage Australian contractors, and preferably and where possible, from the local communities where they are conducting their activities.	Australian Industry Participation Policy
Health and Safety		
Health and safety requirements	Suppliers play a key role in the operations of our facilities and as a result, our policies, systems and processes, and culture apply to both employees and Suppliers equally. Where appropriate, Suppliers are expected to meet the requirements of our <i>Health and Safety Specifications for Contractors</i> as a minimum including but not limited to: <ul style="list-style-type: none"> • Provision of a safe and healthy workplace. • Use of a risk-based approach to hazard management. • Implementing systems and procedures to prevent workplace injuries. • Providing their workers with regular health and safety training. • Ensuring their workers are fit for work. • Ensure their workers exercise personal responsibility for their own health and safety • Have emergency response planning and preparedness in place 	Work Health and Safety Policy Fitness for Work Policy
Environmental		
Environmental Stewardship	Where appropriate, the Supplier shall use a risk management approach to assess and manage the environmental impacts and ensure mitigation measures are implemented to protect the surrounding environment. The Supplier shall have systems and procedures to demonstrate continual improvement of	Environmental Policy Climate Change Policy

	<p>their environmental performance.</p> <p>Where possible, the Supplier shall implement:</p> <ul style="list-style-type: none"> • Initiatives to use water efficiently • Initiatives to reduce energy use and greenhouse gas emissions • A waste mitigation hierarchy to avoid, reuse and recycle water <p>Suppliers shall support Hastings' obligations to report on resource use and emissions where suppliers activities contribute significantly to sites or activities that Hastings has operational control over.</p>	
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Compliance	Requirements	Relevant Policy
Information Security		
Cyber security	Suppliers must manage cyber risks, data and information protection and personal data in line with good industry practice.	Information Security Policy
Information security	Suppliers must maintain and protect and not disclose 'material' or 'market sensitive' information concerning the Company prior to it being related to the Australian Securities Exchange (ASX)	Continuous Disclosure Policy
Social media	Suppliers should only share or repost approved, legal content that has already been distributed on Hastings social media platforms. Only information classed as 'public' or is in the public domain as defined in Hastings Information Classification Guideline is permitted to be shared on social media	Social Media Policy