

HARMONY ENERGY INCOME TRUST PLC

SUPPLIER CODE OF CONDUCT

Approved and adopted by Harmony Energy Income Trust plc (“**Harmony Energy**”) on 10 October 2022. Amended version adopted following review on 12 September 2023

1. Introduction

- 1.1. The Harmony Energy mission is to enable the transition to an environmentally, financially and socially sustainable energy system; and deliver attractive and sustainable returns to shareholders.
- 1.2. Harmony Energy expects its suppliers and their workers, parent, subsidiary or affiliate entities, and subcontractors (**Suppliers**) to comply with the principles set out in this supplier code of conduct (this **Code**).
- 1.3. The principles and requirements set forth in this Code represent the minimum expected standards with which Suppliers should comply and Harmony Energy expects Suppliers to fully comply with all laws and regulations applicable to them and to demand at least the same standards from their own suppliers, consultants, and subcontractors.
- 1.4. Where there are differences between this Code and applicable laws or regulations, the Supplier should follow the stricter standard and should work with their own suppliers towards that goal.
- 1.5. Suppliers are expected to demonstrate their acceptance of and compliance with this Code by (a) reading and confirming their agreement to this Code in writing prior to or on appointment as a Supplier and (b) maintaining accurate and up-to-date records of compliance with this Code. Suppliers are expected to provide such records upon request from Harmony Energy and Harmony Energy reserves the right to audit supplier facilities and practices to confirm compliance.
- 1.6. This Code is based on guidelines including the OECD Guidelines for Multinational Enterprises, the UN Global Compact and the Responsible Business Alliance Code of Conduct.

2. Definitions

- 2.1. **Conflict-affected areas** and **high-risk areas** are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law.
- 2.2. **ILO** means the International Labour Organisation.
- 2.3. **Must** refers to binding requirements which Suppliers must follow.
- 2.4. **OECD** means the Organisation for Economic Co-operation and Development.

2.5. **Should** refers to recommendations which Harmony Energy expects Suppliers to follow.

3. Environment

3.1. Greenhouse Gas (GHG) Emissions and Energy Use

- 3.1.1. Suppliers should seek to improve energy efficiency, minimise energy consumption and reduce GHG emissions.
- 3.1.2. Suppliers must track, document and report on all relevant Scope 1,2 and 3 greenhouse gas emissions using the GHG protocol. Where tracking is not available, suppliers should establish a plan to track this within 1 year of being appointed.
- 3.1.3. Suppliers should track and document electricity, gas, and fuel use.
- 3.1.4. Suppliers must look for methods to minimise energy consumption and GHG emissions.

3.2. Nature and Biodiversity

- 3.2.1. Suppliers should avoid or minimise adverse impacts on biodiversity from their operations.
- 3.2.2. Suppliers should seek opportunities for biodiversity conservation linked to their activity.
- 3.2.3. Suppliers should aim to generate a positive impact on biodiversity and the livelihoods of local people.

3.3. Resources and Waste

- 3.3.1. Suppliers must identify, label and manage chemicals and materials which could pose a hazard to humans or the environment to ensure safe handling, movement, storage, use, recycling or reuse, and disposal.
- 3.3.2. Suppliers must follow local regulations and laws regarding hazardous substances.
- 3.3.3. Suppliers must monitor, control and treat waste generated from operations, industrial processes and sanitation facilities as required.
- 3.3.4. Suppliers should implement measures to reduce and minimise waste generation.
- 3.3.5. Suppliers should implement a water management system that documents, characterises, and monitors water sources, use, and discharge.
- 3.3.6. Suppliers should seek opportunities to conserve water, and control channels of contamination.
- 3.3.7. Suppliers must ensure the minerals, including cobalt, tantalum, tin, tungsten, and gold in the products they manufacture are sourced in adherence with the OECD's Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; and with all applicable laws concerning responsible sourcing and conflict minerals.
- 3.3.8. Suppliers should implement practices to conserve the use of natural resources, such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3.4. Pollution

- 3.4.1. Suppliers must identify, monitor, manage, reduce and responsibly control volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, combustion by-products, and any other air emissions that pose a hazard to the environment resulting from their operations.



- 3.4.2. Suppliers must manage ozone-depleting substances in accordance with the Montreal Protocol.
- 3.4.3. Suppliers should conduct routine monitoring of the performance of their air emission control systems.

4. Social

4.1. Human and Labour Rights

- 4.1.1. Suppliers must support and respect the protection of human rights as articulated in the Universal Declaration of Human Rights, the International Bill of Human Rights, the Ten Principles of the UN Global Compact, and the principles concerning fundamental rights set out in the ILO's Declaration on Fundamental Principles and Rights at Work.
- 4.1.2. Suppliers should ensure there is no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers. Suppliers should clearly define and communicate disciplinary policies and procedures that support these requirements.
- 4.1.3. Suppliers must ensure they are not complicit in human rights abuses and address such impacts when they occur. Where appropriate, suppliers should have a policy commitment to meet their responsibility to meet human rights, a human rights due diligence process and processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute.
- 4.1.4. Suppliers must respect the rights of indigenous and tribal peoples and their social, cultural, environmental and economic interests, including their connection with lands and other natural resources. Suppliers should follow the principles of free, prior and informed consent for the use of indigenous peoples' land, resources, traditional knowledge or intellectual property.
- 4.1.5. Workers must offer themselves for employment voluntarily.
- 4.1.6. Child labour
 - 4.1.6.1. Suppliers must adhere to local laws relating to minimum working age and not engage in forced labour or the employment of child labour in all its forms.
 - 4.1.6.2. Suppliers must implement an appropriate mechanism to verify the age of workers.
 - 4.1.6.3. Suppliers must not employ children under the age of 15.
 - 4.1.6.4. Suppliers must ensure workers under the age of 18 do not perform work that is likely to jeopardise their health or safety, including night shifts and overtime.
- 4.1.7. Wages
 - 4.1.7.1. Suppliers must ensure that legal minimum wage standards are adhered to.
 - 4.1.7.2. Workers must receive clear information on wages.
 - 4.1.7.3. Suppliers must ensure the payment of wages in legal tender, at regular intervals no longer than one month.
 - 4.1.7.4. Suppliers must not use unfair deductions from wages as a disciplinary measure.
- 4.1.8. Suppliers must adhere to local or national law relating to working hours, including breaks.
- 4.1.9. Contracts



- 4.1.9.1. As part of hiring processes, suppliers should supply all workers with a written employment agreement in their native language, containing a description of the terms and conditions of employment.
- 4.1.9.2. Suppliers should provide foreign migrant workers with their employment agreement prior to the worker departing from their country of origin. Suppliers should not change the employment agreement upon arrival in the country unless the changes are made to meet local law and provide equal or better terms.
- 4.1.10. Suppliers should make available a mechanism for grievances relating to labour practices.
- 4.1.11. Suppliers must respect the rights of freedom of association and the right to collective bargaining.

4.2. Health, Safety and Wellbeing

- 4.2.1. Suppliers must ensure a healthy and safe working environment. Suppliers must provide PPE (personal protective equipment) where applicable, potable drinking water, adequate lighting, access to sanitation, and ventilation.
- 4.2.2. Suppliers should train workers on emergency planning, including first aid training and fire management techniques.
- 4.2.3. Suppliers should identify, evaluate and control workers' exposure to chemical, biological, and physical agents.
- 4.2.4. Suppliers should evaluate production and machinery for safety hazards. Physical guards, interlocks, and barriers should be provided and maintained where machinery presents an injury hazard to workers.
- 4.2.5. Suppliers must follow local regulations and laws regarding occupational health and safety requirements, and adhere to the requirements set out in the ILO International Labour Standards on Occupational Safety and Health.
- 4.2.6. Suppliers should prevent, manage, track, and report occupational injury and illness.
- 4.2.7. Suppliers should encourage workers to raise any health and safety concerns without fear of retaliation.

4.3. Diversity and Inclusion

- 4.3.1. Suppliers must ensure equality of opportunity and treatment in respect of employment and occupation without discrimination on the grounds of race, colour, sex, gender, religion, disability, political opinion, national extraction, social origin, or any other grounds.

5. Governance

5.1. Ethical Business Practices

- 5.1.1. Suppliers must adhere to anti-bribery and corruption policies no less stringent than those of Harmony Energy Income Trust plc. A copy will be made available to suppliers on request.
- 5.1.2. Suppliers should work against corruption in all its forms, including extortion and bribery.
- 5.1.3. Suppliers should never make gifts or offer bribes and other financial contributions to workers, stakeholders or any other individual to influence them to gain favours.



- 5.1.4. Suppliers must avoid or actively manage all potential conflicts of interest while engaged with Harmony Energy and notify Harmony Energy of any potential conflicts of interest that cannot be avoided.
- 5.1.5. Suppliers must conduct business in adherence with applicable antitrust and fair competition laws.
- 5.1.6. Suppliers must uphold standards of fair business and competition.
- 5.1.7. Suppliers must accurately record information regarding their business activities, and disclose such information without falsification or misrepresentation to appropriate parties.

5.2. Protecting Information

- 5.2.1. Suppliers must protect workers' and clients' privacy regarding personal data and information.
- 5.2.2. Suppliers must comply with local data security and confidentiality laws and regulations.
- 5.2.3. Suppliers must use personal data only when lawful and necessary to fulfil legitimate business purposes.
- 5.2.4. Suppliers must respect intellectual property rights.
- 5.2.5. Suppliers must ensure confidentiality, anonymity, and protection of worker whistle-blowers are maintained.

5.3. Responsible Management Systems

- 5.3.1. Suppliers should take a precautionary approach to environmental challenges.
- 5.3.2. Suppliers should undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies.
- 5.3.3. Suppliers should take steps to understand their climate, nature and social risks, minimise impact and to implement policies and targets.
- 5.3.4. Suppliers should provide workers with information on all grievance procedures.
- 5.3.5. Suppliers should establish a process to communicate requirements under this Code to suppliers and monitor supplier compliance.