



+ Our Code  
of Conduct





# Message from the CEO

We believe that together we can change our world for the better. To do this well, we must, at all times, conduct ourselves with integrity. We must maintain the highest standards of ethical behavior in every corner of our business. And above all, we must be accountable for our actions, as we partner with clients, communities, and stakeholders to deliver safe, respectful, legal, and sustainable projects around the world.

Our Code of Conduct is driven by these values. It helps us to create a culture that fosters transparency, and it empowers our people with the right tools to avoid, identify, and respond to all ethics-related issues.

We are all responsible for adhering to the Code and have a duty to report all ethics-related issues. You are the embodiment of our values. Please take the time to read and understand the Code and encourage your colleagues to do the same.

Thank you for living your commitments with integrity and believing in our business.

John Bianchini  
Chairman and Chief Executive Officer

# Application of the Code of Conduct

Hatch employees must behave in accordance with the principles stated in this Code while performing their duties, with clients, with colleagues and when representing Hatch in any environment (i.e., client events, industry events, teams meetings etc). We expect that our contractors, suppliers, joint venture partners, subcontractors, and vendors who work with us act in a manner consistent with these principles.

At the same time, when we work with our clients and partners, we respect and comply with their codes of conduct. If there is an inconsistency between codes, the most stringent will apply.

## Our Promise

This is how we deliver value to our clients.

### Safety

Health and safety is at the core of everything we do. It's more than just managing risks—we make safety a front-of-mind issue for everyone, building a strong safety culture for employees, partners, and the communities we serve. We believe this is imperative to mitigate risks and reduce incidents.

We do this by:

- Working together safely with the goal of “no harm” to people, the environment, and communities associated with projects and activities managed by Hatch
- Designing facilities for our clients that are inherently safe to operate
- As individuals, working free from the influence of any substance that could prevent us from conducting our work safely and effectively.

### Quality

Achieving the highest attainable standards to enable asset owners to achieve their business goals, safely and responsibly—that's always the key objective. We have processes and structures in place to help

ensure consistency of equipment, skills, and service, for optimal project results. Our Quality Management System is designed to continuously find new ways to enhance project outcomes. It documents best practices and empowers us all to achieve exceptional results. By working closely with our partners, and welcoming their feedback, we are constantly improving and finding new ways to do things better. At all times, we are rigorous in our work so it is correct, complete, and consistent.

We do this by:

- Building systems and processes that allow you to communicate and work together effectively on a global basis
- Encouraging excellence in our people, through professional and personal development, and ensuring everyone can make a difference
- Innovating in all that we do, applying new ideas to help our clients achieve unprecedented and sustainable business results
- Continuously improving the quality of our deliverables and our services.

## Sustainability

We define sustainability as the optimization of environmental protection, economic prosperity, social justice, and cultural vibrancy to ensure that businesses, ecosystems, and communities thrive, now and in the future. Sustainability is at the core of how we deliver value to our clients as a socially responsible company.

We demonstrate sustainability by:

- Optimizing environmental, social, economic, and cultural impacts in all aspects of our business
- Planning, designing, and implementing projects that focus on creating sustainable value for our clients and their communities
- Following the Hatch Project LifeCycle Process, incorporating sustainability principles in all aspects of our services
- Operating our own facilities in a safe, environmentally and socially responsible manner, while minimizing our footprint
- Developing, employing, and disseminating innovative technologies and methods that integrate sustainability into our business and our clients' facilities
- Contributing to the communities in which we live and work through initiatives such as volunteering and charitable giving, with a particular focus on educational scholarships
- Providing us all with the training, opportunity, and encouragement to integrate sustainability as part of our work.

## Global compliance

We comply with all laws and respect the customs and business practices of the countries in which we work.



# Responsibility and accountability

We honor our commitments, take responsibility for all matters over which we have control, and are accountable for the results and consequences of our work.

## Our expectations

We are all individually responsible for:

- Complying with the provisions of our Code and completing the training upon induction at Hatch
- Being aware of and respecting the laws and regulations applicable in all jurisdictions in which we work
- Making sure we understand and apply the policies and standard operating procedures relevant to our individual scope of work
- Immediately seeking help or guidance from available resources when in doubt
- Being unconditionally honest, reporting any breach or suspected breach of our Code, its underlying policies, or standard operating procedures
- Living our commitments with integrity, always.

In addition, we expect those in leadership to:

- Lead by example and live up to the standards of our Code
- Ensure our colleagues understand and follow the standards set forth in our Code, policies, and standard operating procedures
- Develop an open and accessible environment where our colleagues feel welcome to report their concerns without fear or discrimination
- Support and protect individuals who, with honesty and integrity, raise a concern or report potential unethical or non-compliant behavior
- Follow up when we hear about potential misconduct and never ignore questionable behavior.

## Behavior

We expect all Hatch employees and any person working with or for Hatch to demonstrate appropriate behaviors:

- Cultivate and foster a diverse and inclusive culture.
- Maintain a professional demeanor in all settings and interactions when attending any Hatch-sponsored function, client event, industry event, and, but not limited to, any social media accounts/platforms that you may use.
- Any personal opinions or statements in a business setting or on any social media platforms should include a statement clarifying your thoughts are your own and do not reflect the views of Hatch.
- When providing information to the public, report all related facts accurately, completely, and in a timely and comprehensive manner. Care should be taken to not disclose confidential company or client information. If you are unsure, you must seek appropriate approvals.
- Do not speak with the media on behalf of Hatch, our clients, or partners without express written approval that has been granted in advance by Hatch's public relations team.

# Respect in the workplace

We maintain a supportive, professional, and positive workplace environment by:

- Appreciating the unique skills, experience, and talent of each individual
- Treating everyone with courtesy, fairness, and respect
- Believing that a diverse workforce is a strong workforce, capable of developing compelling ideas and achieving better business results
- Creating a vibrant work environment that is open, challenging, and fun
- Individually and collectively striving to keep our workplace free from harassment, bullying, violence, and discrimination
- Encouraging employees to enhance their professional and personal development, reach their full potential, and make a difference.

# Relationships

We build relationships and teams based on trust, honesty, integrity, and respect. Our teams actively collaborate and openly share their experience and knowledge globally.

# Confidentiality and privacy

We understand and respect the sensitive and confidential nature of the information that we are provided, in our roles and by clients, and do not release this information without appropriate consent—unless required to do so by law.

We respect and protect the privacy of personal information, including you, as an employee, and those who work with us.

# Fairness, integrity, and honesty in our dealings

We establish and maintain professional relationships with our clients, contractors, suppliers, vendors, joint venture partners, and others, based on mutual respect, integrity, and honesty. We achieve this by:

- Prohibiting acts of corruption, bribery, or the improper influencing of decision makers
- Respecting that gift-giving and providing entertainment is an important cultural business practice in some of the countries in which we work. At the same time, we use careful judgment to ensure that we do not offer or accept such benefits when the situation could either reasonably be perceived to create an obligation or would be in breach of the recipient's policies
- Avoiding any situation that creates or appears to create a conflict of interest, and informing clients of all known or perceived conflicts of interest
- Not disclosing or trading upon non-public, market sensitive information
- Competing fairly and ethically, offering services based on our qualifications and experience
- Observing applicable laws regarding political contributions, activities, and lobbying.



## Further guidance and raising concerns

While most ethics-related decisions can be made using good judgment, sometimes the answer is unclear. Our Code is designed to provide you with the clarity you need to address those difficult decisions. If the answer is still unclear after consulting the Code, further guidance can be obtained from our company's corporate policies, found on Hatch Hub, by speaking with your manager or Human Resources representative.

If you are aware of a situation that you believe may raise concerns under our Code of Conduct, you should try to raise it first with the person involved. If this is not possible or successful, then promptly bring the matter to the attention of your manager, Human Resources representative, an associate, or board member; alternatively, you can submit your query or report confidentially, securely, and anonymously through our web-based **Hatch Code of Conduct anonymous email hotline**. Every report will be duly investigated and Hatch supports individuals who report genuine concerns.





# Code of Conduct Acknowledgement



## Compliance

This Code of Conduct establishes the standards of behavior Hatch expects from all their employees and where these standards are not met, Hatch reserves the right to require the employee in question to bring themselves into full compliance with the requirement(s) in question within a defined and reasonable time period and to correct their behavior to Hatch's satisfaction. In the event of serious, material and/or persistent non-compliance Hatch will take appropriate disciplinary action against the employee.

## Hatch Employee

I acknowledge that I have read, understood and will comply with the Hatch Code of Conduct.

Signed \_\_\_\_\_

Date \_\_\_\_\_

Name \_\_\_\_\_

Hatch supplier, consultant, contractor, or business associate, where such person shall be working under Hatch supervision and performing services for and on behalf of Hatch or in joint venture or partnership with Hatch.

On behalf of \_\_\_\_\_ (name of supplier/consultant/contractor/business associate) the undersigned acknowledges that he/she has read, understood and will comply with the Hatch Code of Conduct while working with Hatch.

Signed \_\_\_\_\_

Date \_\_\_\_\_

Name \_\_\_\_\_

Title \_\_\_\_\_



HATCH