



# **Code of Business Conduct & Ethics**

# A Message from our CEO



A stylized, handwritten signature in blue ink, appearing to read 'Alex Cronin'.

Alex Cronin

Dear valued Coworker,

As the principal of Hardware Nation, I believe that our success is built on a foundation of trust, integrity, and respect. These principles guide every aspect of our business and are critical to maintaining our strong reputation in the market.

That is why I am pleased to introduce our Code of Ethics, a set of standards that outline our commitment to ethical behavior in all our dealings. This code reflects the values that we hold as an organization and provides guidance for the decisions and actions of our employees.

I am proud to lead a company that is dedicated to conducting its business with honesty, fairness, and responsibility. Our commitment to ethical behavior not only benefits our customers, partners, stakeholders, and communities, but also helps to ensure the long-term success and sustainability of our business.

I encourage all employees to review this Code of Ethics and make it a part of their daily work. Let us continue to build a culture of integrity and respect and demonstrate our commitment to doing the right thing.

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# Hardware Nation Code of Ethics

## Overview

Our company has established a code of ethics to guide our actions and ensure that we conduct ourselves with integrity and respect toward all stakeholders. This code sets forth the principles and values that define our ethical behavior, including honesty, fairness, responsibility, and transparency.

We are committed to conducting our business in accordance with the highest ethical standards and in compliance with all relevant laws and regulations. This includes treating our customers, employees, partners, and suppliers with respect and dignity, and maintaining the confidentiality and privacy of their information.

We also recognize our social and environmental responsibilities and strive to minimize the impact of our operations on the environment and the communities in which we operate. We are dedicated to promoting sustainable business practices and contributing to the well-being of the people and communities we serve.

Our code of ethics is a living document, regularly reviewed and updated to reflect the changing needs of our business and the world. We encourage all employees to adhere to its principles and to act with integrity and in the best interests of our company and all stakeholders.

## Obligation to Speak Up

The obligation to speak up is a critical component that promotes transparency and accountability within an organization. This means that employees have a responsibility to report any unethical or illegal behavior they observe, regardless of who is involved.

Our company encourages employees to speak up when they witness or become aware of any actions or decisions that violate our code of ethics or the law. This can include reporting concerns about financial irregularities, conflicts of interest, discrimination, harassment, or other unethical practices.

We have established a confidential reporting system that allows employees to raise concerns without fear of retaliation. This system is designed to protect the anonymity of employees and to provide them with a safe and secure means of reporting their concerns.

Additionally, we provide training and education to all employees on the importance of speaking up and reporting any unethical or illegal behavior. We also have mechanisms in place to ensure that all reports are investigated promptly and thoroughly, and that appropriate action is taken to address any violations of our code of ethics.

The obligation to speak up is an important aspect of our company's commitment to promoting ethical behavior and maintaining a culture of transparency and accountability. By encouraging employees to report any concerns, we can foster a workplace that is free from unethical or illegal practices and that prioritizes the well-being of all stakeholders.

## Conflicts of Interest

Conflicts of interest are a common challenge in business and can undermine the integrity and reputation of an organization. In a code of ethics, a conflict of interest is defined as a situation in which an individual's private interests interfere, or appear to interfere, with the interests of the organization. Conflicts of interest can arise in various forms, such as personal financial gain, relationships with suppliers or customers, or competing business interests.

To address conflicts of interest, our company has established policies and procedures to identify, disclose, and manage potential conflicts. All employees are required to disclose any actual or potential conflicts of interest to the company, and to avoid situations that could compromise their ability to act in the best interests of the company.

We also prohibit employees from engaging in activities that create a conflict of interest or that appear to compromise their independence and objectivity. This includes accepting gifts, favors, or compensation from suppliers, customers, or other business partners that could influence their decisions or compromise their judgment.

In addition, we have implemented processes for evaluating and addressing actual or potential conflicts of interest that may arise in the course of business. This includes seeking the advice of legal and compliance departments, and in some cases, seeking the approval of senior management or the board of directors.

By proactively identifying and managing conflicts of interest, our company is able to maintain its integrity, reputation, and trust with all stakeholders.

## Treatment of Customers

The treatment of customers is a crucial aspect of our company's code of ethics. It is essential to building and maintaining trust with our customers and ensuring their satisfaction with our products and services.

We are committed to providing our customers with the highest level of service and to treating them with respect, fairness, and dignity. This includes listening to their needs, providing accurate information, and delivering products and services that meet or exceed their expectations.

We also recognize the importance of protecting the privacy and confidentiality of our customer's information, and we have established policies and procedures to ensure the secure handling and storage of their personal and financial data.

Additionally, we strive to provide our customers with transparent pricing and product information and to avoid any deceptive or misleading marketing practices. We are also committed to resolving any customer complaints or concerns promptly and fairly and continuously improving our products and services to meet their changing needs. By treating our customers with the utmost respect and integrity, we are able to build long-lasting relationships and maintain their trust in our company. This helps ensure our business's success and growth and the well-being of all stakeholders.

## Inclusion and Diversity

We believe that a diverse and inclusive workplace contributes to a more creative, innovative, and productive work environment.

We are committed to promoting diversity and inclusiveness in all aspects of our business, including hiring, promotion, and compensation. We also strive to create a workplace culture that values and respects the differences among employees, and that provides equal opportunities for everyone to contribute and grow.

We prohibit discrimination or harassment of any kind, including on the basis of race, ethnicity, gender, sexual orientation, age, religion, or any other characteristic protected by law. We are also committed to providing a workplace that is free from any form of discrimination or harassment and that supports the health, safety, and well-being of all employees.

In addition, we believe in fostering a work environment that is accessible and accommodating to people with disabilities, and that provides reasonable accommodations to support their full participation in the workplace.

By promoting diversity and inclusiveness, our company is able to tap into the unique perspectives and skills of our employees, which helps to drive innovation and growth. It also helps to create a workplace that is inclusive, supportive, and respectful, where all employees can thrive and succeed.

## Fair Dealings

Fair dealings are a fundamental aspect of our company's code of ethics, as they reflect our commitment to ethical and honest business practices.

We are committed to conducting business with integrity and to treating all stakeholders, including customers, suppliers, and competitors, fairly and with respect. This includes engaging in fair competition, avoiding deceptive or misleading practices, and respecting the confidential information and intellectual property of others.

We also believe in fulfilling our obligations to customers and suppliers in a timely and reliable manner, and in providing them with accurate information about our products and services. This helps to build trust and long-lasting relationships with our stakeholders.

## Compliance with Government Requirements

Compliance with government requirements is an essential aspect of our company's code of ethics, as it demonstrates our commitment to operating in accordance with the law and to upholding the highest standards of ethical behavior.

We are committed to complying with all applicable laws, regulations, and standards, both in the countries where we operate and in the countries where our customers and suppliers are located. This includes laws related to anti-corruption, anti-money laundering, labor and employment, health and safety, environmental protection, and others.

We also recognize the importance of compliance with international standards, such as the United Nations Global Compact, and with industry-specific standards, such as the Extractive Industries Transparency Initiative.

We have established policies and procedures to ensure compliance with all relevant laws and regulations, and we provide training and education to all employees on their legal and ethical obligations. We also have mechanisms in place to detect and report any violations of law or our code of ethics, and to take appropriate action to prevent and correct any non-compliance.

## Improper Payments

Improper payments are a serious violation of our company's code of ethics, as they undermine the integrity of our business and can lead to legal and reputational risks.

We are committed to conducting business with integrity and to avoiding any form of bribery or corruption, whether direct or indirect, in all of our operations. This includes prohibiting the making of any improper payments, such as bribes, kickbacks, or other payments that are intended to influence the actions of others.

We also recognize the importance of transparency in our financial dealings and we maintain accurate and complete records of all transactions. We have established policies and procedures to prevent and detect improper payments, and we provide training and education to all employees on their obligations to avoid such practices.

## Export Control

Export control is a crucial aspect of our company's code of ethics, as it reflects our commitment to compliance with the law and to ensuring that our products and services are not used in a manner that could harm others or that is contrary to our values.

We are committed to complying with all applicable export control laws, regulations, and sanctions, both in the countries where we operate and in the countries where our customers and suppliers are located. This includes laws related to the export of sensitive technologies, the trade in arms and dual-use goods, and the imposition of economic sanctions.

We have established policies and procedures to ensure compliance with all relevant export control laws and regulations, and we provide training and education to all employees on their obligations to avoid any violations. We also have mechanisms in place to detect and report any suspected violations, and to take appropriate action to prevent and correct any non-compliance.

By operating in compliance with export control laws and regulations, our company is able to promote a culture of ethical behavior, to protect its reputation and integrity, and to ensure the success and growth of our business. This helps to ensure that our operations are conducted in a responsible and sustainable manner, and that the rights and interests of all stakeholders are respected and protected.



