



## THIRD PARTY CODE OF ETHICS

HJF, HJFMRI and HJFMRI LTD-GTE (hereinafter, “HJF”) are committed to dealing honestly and fairly with our employees, partners, customers, suppliers, and the communities in which we live and work. At HJF, we apply the highest standards of ethics and compliance to our business conduct, and we seek out partners and suppliers who maintain the same high standards. HJF recognizes the critical role our partners and suppliers, subcontractors and consultants (hereinafter, each a “Third Party” or collectively “Third Parties”) play in maintaining HJF’s reputation worldwide. Third Party shall comply with this Code of Ethics in all respects and shall maintain appropriate processes and controls to comply with this Code of Ethics.

### Compliance with Laws:

- Third Party shall comply with all applicable local and international laws and regulations.
- Third Party shall not break or seek to evade any applicable laws or regulations, even if an illegal act is considered a customary business practice in a specific region or industry.
- To the extent any applicable law or regulation is more restrictive than this Code of Ethics, such law or regulation shall govern.

### Counteracting Corruption:

- Third Party shall not, nor allow anyone acting on behalf of the Third Party, to offer or provide a kickback or other bribe either directly or indirectly. Any demands for bribes of any kind shall be expressly rejected.
  - Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order for the official or employee to act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage.
- Third Party shall not offer or make payments to government officials in order to encourage them to expedite or otherwise facilitate a routine governmental task that they the official is already required to undertake by virtue of their position, except if necessary to avoid immediate threat to health or safety.
- Third Party, and anyone acting on behalf of the Third Party shall avoid the offer or receipt of gifts, meals, entertainment, hospitality, or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and bona fide expenditures, or are in violation of any applicable law or regulation.
- Third Party shall refrain from any business practices that unlawfully restrain competition.
- Third Party shall actively and consistently fight corruption within its organization.

### Conflicts of Interest:

- Third Party, and anyone acting on behalf of the Third Party, shall avoid any relationship or activity that might impair, or appear to impair, the ability to render objective and appropriate business decisions in the performance of its duties to HJF. Third Parties shall report to HJF any situation of potential or apparent conflict of interest in dealings with HJF. This includes a conflict between the interests of HJF and personal interests of officers, directors and senior managers of Third Party.

### Counteracting Illegal Employment and Respecting the Fundamental Rights of Employees:

- Third Party shall comply with applicable legal requirements for employment.
- Third Party shall respect the health, safety and personal rights of their employees and adhere to the principles of respect, fairness and non-discrimination. They shall employ and remunerate their employees fairly.

**Human Rights**

- Third Party shall treat people with respect and dignity.
- Third Party shall ensure that illegal child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.
- Third Party must adhere to regulations prohibiting human trafficking and comply with all applicable local laws. Third Party shall refrain from violating the rights of others, including the use of forced labor, and shall address any adverse human rights impacts their operations.

**False Claims:**

- Third Party shall not make any false or fraudulent statements in support of a claim for payment from HJF.

**Data Protection:**

- Third Party shall handle and disclose data and confidential information that they obtain in the course of their relationships with HJF only as authorized and directed by HJF and in accordance with all applicable laws and regulations.
- Third Party shall protect personal data and confidential information against unauthorized and unlawful use, disclosure, access, loss, alteration, damage and destruction, all in accordance with any contractual agreements with HJF.

**Export Control:**

- Third Party shall ensure all appropriate export control licenses are obtained when exporting controlled equipment or controlled data on behalf of HJF.

**Environment, Health and Safety:**

- Third Party shall operate in a manner that actively manages risk, conserves natural resources, and protects the environment. Third Party shall comply with all applicable environmental, health and safety laws, regulations, and directives. Third Party shall take all necessary actions to protect the health, safety, and welfare of its people, visitors and others who may be affected by their activities.

**Reporting Violations of the Code:**

- Third Party shall report to HJF its own violations of this Code of Ethics, insofar as these violations affect their business relations with HJF. They are also asked to report to HJF any knowledge of misconduct on the part of HJF employees.
- Third Parties are required to cooperate fully with HJF in this regard.

**Contact HJF:**

- Jessica Bejarano, JD, VP, Chief Ethics & Compliance Officer; tel.: +1 240-694-2082; [jbejarano@hjf.org](mailto:jbejarano@hjf.org)
- **Compliance Hotline**, +1-866-687-2321 **Web Reporting:** <https://hjf.ethicspoint.com>.
  - Note: In any reporting, Third Party may choose to keep their identity anonymous.
- **HJF Ethics & Business Conduct Department Resources:** <http://www.hjf.org/about/ethics/> , 240-694-4004, [ethics@hjf.org](mailto:ethics@hjf.org)

Additionally, HJF may update this Code of Ethics from time to time. You may find the latest version at: <https://www.hjf.org/doing-business>