



HARTE HANKS ETHICAL TRADING POLICY

Last Updated: April 16, 2024

WHO WE ARE

Harte Hanks, as a socially responsible business, understands that our clients and shareholders have a right to expect:

- Products we source/ use in our business are produced under working conditions that are ethical, hygienic, and safe.
- All companies involved in the Harte Hanks supply chain, from direct suppliers and subcontractors, are treated with full consideration to their basic human rights.
- Our activities are carried out in an ethical manner above and beyond basic legal requirements.
- We have implemented an environmental, social and governance (ESG) policy to ensure that these ethical practices are being followed, both in the US and in our international locations.

Although we are not a member of the Ethical Trade Initiative (ETI), Harte Hanks has adopted and is committed to following and implementing (in addition to ESG) the principals of the Ethical Trading Initiative Base Code. For more information on the ETI Base Code, please visit <https://www.ethicaltrade.org/eti-base-code>.

OUR COMMITMENT

This policy sets forth Harte Hanks' commitment to its clients and shareholders and the measures we are taking to ensure that we act in an ethical manner.

- **Employees:** Harte Hanks is committed to ensuring that our employment practices and corporate policies are consistent with current laws and regulations to ensure the protection of the rights of all those who work for us. Frequently we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued.
- **Clients:** Harte Hanks is committed to demonstrating its ethical and social responsibility credentials to enable clients to make informed choices about who they are procuring their services from, and how we operate in providing those services.
- **Suppliers:** Harte Hanks is committed to monitoring our supply chain, and we encourage our suppliers to operate at a level that honors the same ethical standards we employ ourselves. Suppliers are expected to accept responsibility for labor and environmental conditions under which services are provided and, in all circumstances, abide by the principles of the ETI Code of Conduct whenever possible.

Below are the core elements of the ETI Base Code principles. These principles apply to the team employed by Harte Hanks in a temporary, seasonal, or regular capacity, and individuals we use as temporary employees (by way of contractors or employment agencies) to work on behalf of Harte Hanks.

In addition, consistent with our ESG policies, Harte Hanks is committed to ensuring its practices promote a culture of respect, inclusion and diversity.

1. Employment is freely chosen
We and our suppliers will employ all staff of their own free will with no employee being subject to forced or bonded labor, nor is child labor ever permitted or accepted.
2. Freedom of Association and Right to Bargaining are respected
We and our Suppliers respect the right of employees to associate freely and for employees to negotiate and openly discuss their working environment with us, including open discussions regarding wages, work conditions and hours worked.
3. Working conditions are safe and hygienic

We and our suppliers will provide a safe and healthy working environment for our employees, bearing in mind the prevailing knowledge of the industry and any specific hazards, in the prevention of accidents and injury in the workplace. In this regard, Harte Hanks has a published Safety Policy which has been included within our employee handbook for employees to access and read.

4. Child labor shall not be used
Although not prevalent in our areas of operation, there shall be no recruitment of child labor. Individuals under 16 are not employed at any time. Individuals under 18 shall not be employed at night or in hazardous conditions.
5. Living wages are paid
We and our suppliers will pay employees equal to or above the statutory minimum wage and shall not unreasonably reduce wages.
6. Working hours are not excessive
We and our suppliers will ensure that employees' working hours, and use of leave entitlements, are appropriately monitored so as not to infringe upon any statutory regulations.
7. Discrimination shall not be practices
We and our suppliers will strive to ensure that equal opportunities in the workplace exist, regardless of a person's race, gender, religion or other distinguishing factor, and we shall not engage in discrimination with regard to recruitment or employment within the company.
8. Regular employment is provided
We and our suppliers will provide employment on the basis of a recognized employment relationship consistent with current laws and current practices. Furthermore any employment obligations shall not be avoided through the excessive use of labor only contracting, sub-contracting, apprenticeship schemes or fixed term contracts of employment.
9. No harsh or inhumane treatment is allowed
We and our suppliers will at all times respect our employees' human rights. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and will be grounds for disciplinary action, up to and including termination of work.

COMMUNICATION

This Policy will be communicated directly to all Employees, and included in the Company's new employee onboarding, and employee handbook. A copy of the Policy will also be posted on Company notice boards and/or intranet sites, and on our Company website. Questions related to the use, understanding, or direction of this Policy should be directed to the Human Resources department.

REPORTING

We are committed to an open and accountable culture where employees and others can express concerns about our work activities. Information, once provided by an employee, will be taken seriously and treated fairly without reprisal or retaliation against anyone making a report.

All stakeholders (which includes employees, shareholders, clients, suppliers and their employees, sub-contractors and their employees) are invited to contact any manager or Director of Harte Hanks to discuss and report any complaint or grievance, or to otherwise report a potential violation of these ETI Base Code principles. Any staff wishing to remain anonymous are invited to contact the Ethics Hotline at 866-480-2667. Please begin the conversation with the words "I wish to make an anonymous report..."

If a possible violation of the ETI Base Code principles is identified, then we will work with all parties involved to seek redress, and to take the necessary steps to have the issue resolved. As part of this process, we'll investigate the root cause of the issue so we can take appropriate steps to prevent such a violation reoccurring in the future.

RESPONSIBILITY

- Our Managing Directors and Senior Management Team have overall responsibility for the implementation of this policy.
- Line Managers and Supervisors are required to familiarize themselves with, and understand this Policy, and it's operation, and any related procedures.

AWARENESS AND TRAINING

- Human Resources will provide on-going training and guidance on the responsibilities of this Policy to allow our employees to apply the ETI Base Code in their daily work.
- Suppliers shall be made aware of the ETI Base Code and the Company's commitment to sourcing from suppliers who observe the standards in the Base Code.
- Employees whose job function is covered by the Base Code shall be made aware of the Base Code and how to effectively implement the Code's principles and procedures.

REVIEW

We will regularly review and, when necessary, update this Policy to ensure it remains responsive to our clients and shareholders expectations. We will also frequently review and revise this Policy to align with our business strategy, and to address legislative and related changes.

FURTHER INFORMATION

For more information on Harte Hanks Ethical Trading or any Human Resources Policy, or if you are an existing or prospective supplier with questions or comments, please contact our Head of Human Resources (Nina.Hall@hartehanks.com).

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