



SUPPLIER CODE OF CONDUCT

Rev. July 21, 2022



Consolidated Metco, Inc. and its business units and subsidiaries (collectively, “ConMet,” or “Company”) are committed to the highest standards of ethics and business conduct. This Supplier Code of Conduct (the “Code”) sets forth our expectations for our entire community of product and service suppliers, and aligns with the expectations we maintain for our own directors, officers, employees and representatives. Our requirements and expectations in the Code reflect applicable laws, widely accepted international human rights principles, and our own internal policies and procedures.

Our suppliers are critical to our success. In order to provide superior products and services to our customers in a responsible manner, we require you to meet our expectations for ethics and compliance as set forth in this Code. ConMet understands and expects that our product and service suppliers will have their own internal codes of ethics and conduct; this Code is not intended to be an exhaustive list of all ethical and business conduct requirements. You are responsible for ensuring that your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.

The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of your contract(s) with ConMet. **If a contract requirement is more restrictive than the Code, you must comply with the more restrictive contract requirement.**

Supplier Obligations

Every Company supplier must:

- ▶ Know and follow this Code.
- ▶ Report any non-compliance and transparently report remediation progress.
- ▶ Demonstrate appropriate internal controls upon request.
- ▶ Enforce a similar code and require that your suppliers do the same.
- ▶ Identify and use suppliers who adhere to the requirements of this Code and monitor those parties’ compliance.

Ethical and Responsible Business Practices

Compliance with Laws. You must maintain compliance with all laws applicable to the operation of your business and your relationship with the Company.

Do Business Free from Bribery and Corruption. You are prohibited from engaging in any form of bribery, corruption, embezzlement, or fraud. This includes giving or receiving, directly or indirectly, anything of value, including money, gifts, courtesies, or unlawful incentives, with the intent or effect of improperly influencing negotiations or dealings with governments and governmental officials, customers, or any other third parties. This also includes making facilitation payments (e.g., payments to expedite or secure performance of a routine governmental action like obtaining customs clearance). Suppliers must accurately record business expenditures, never concealing the true nature of an expense.

Protect Confidential and Private Information. You are required to protect from disclosure the Company’s and its customers’ confidential information, such as agreements and other legal documents, intellectual property, trade secrets, and other proprietary, non-public, or competitively sensitive information. You are expected to properly manage and safeguard confidential information in a secure and protected environment and to require third parties to enter into confidentiality or non-disclosure agreements prior to holding discussions about confidential matters. Suppliers must maintain effective privacy and cyber security practices that comply with applicable data protection and information security laws and regulations. You must promptly report to the

Company all cyber security incidents affecting your computing environment within 24 hours of knowing about the incident.

Avoid Conflicts of Interest. You are expected to recognize and continuously avoid situations that can or do create actual or potential conflicts of interest when doing business with the Company or its customers. A conflict of interests exists when a personal interest or activity interferes or appears to interfere with your business relationship with the Company. Suppliers must promptly report any actual or potential conflicts between your interests and those of the Company, such as when one of your employees (or someone close to them) has a personal relationship with a ConMet employee who can make decisions impacting your business, or when one of our employees has an ownership or financial interest in your business.

Comply with Customs and Foreign Trade Laws. Suppliers must conduct business in strict compliance with all applicable trade controls, laws, and regulations governing the export, re-export and retransfer of goods, technical data, software, and services; import of goods; economic sanctions and embargoes; and U.S. antiboycott requirements. Our supplier must not engage in direct or indirect commercial activity with sanctioned countries, territories, entities, persons, or sectors. It is expected that our suppliers conduct appropriate due diligence to comply with sanctions, export controls, and anti-boycott requirements and maintain accurate and complete records related to customs activities.

Engage in Fair Competition. You must not engage in anti-competitive conduct for any reason in the course of doing business with or for the Company. You must never rig bids, fix prices, allocate customers or markets, or exchange the Company's or your competitively sensitive information (e.g., price, cost, output, etc.) with our competitors or yours. You must also refrain from abuses of market power and from deceptive or unfair market practices, including making misrepresentations regarding the Company's, yours, or other party's products or services, or denigrating competitors' products or services.

Conflict Minerals Prohibited. Conflict minerals include tin, tungsten, tantalum, and gold (also referred to collectively as "3TG Minerals") originating from the Democratic Republic of Congo or countries in that region. Publicly traded companies subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act must perform a reasonable "country of origin" due diligence inquiry on 3TG Minerals used in their supply chains and adhere to certain reporting obligations to the U.S. Securities and Exchange Commission. Our suppliers who are subject to Section 1502 must maintain full compliance with its provisions and requirements. More information about Section 1502 can be found at www.sec.gov/rules/final/2012/34-67716.pdf and ConMet's full policy statement on conflict minerals can be found [here](#).

Labor and Human Rights

No Child Labor. The use of child labor is forbidden under all circumstances, and you must ensure that child labor is not used in the performance of your work. The term "child" refers to any person under the minimum legal age for employment where the work is performed as set by local, state, or national authorities.

No Human Trafficking, Forced, or Compulsory Labor. You must comply with laws and regulations prohibiting human trafficking. You are forbidden from engaging in or benefitting from the use of forced or compulsory labor, including bonded labor, indentured labor, involuntary prison labor, slavery or trafficking in persons. Workers shall be free to terminate their employment at any time and consistent with the terms of any applicable contract.

Fair and Legal Employment Conditions. Our suppliers must comply with all applicable regulations, laws, and bargained-for provisions pertaining to employee wages, work hours, overtime, and benefits. A supplier shall inform its workforce of the basis on which they are paid and pay them in a timely manner. Deductions from wages as a disciplinary measure shall not be permitted.

No Discrimination or Harassment. Suppliers shall not allow or tolerate discrimination or harassment based upon race, color, religion, age, gender, sexual orientation, gender identity, national origin, disability, veteran status, genetic information, pregnancy, or other factors that may be covered by local law.

Respect Freedom of Association. Suppliers shall comply with applicable laws that recognize and respect the rights of employees to form and join workers' organizations, to associate freely, and to bargain collectively.

Reporting Misconduct. We expect suppliers to provide employees and business partners with access to adequate reporting channels on an anonymous or self-identified basis to raise legal or ethical issues or concerns without retaliation, including, without limitation, reports of a violation of this Code. In the event that you become aware of misconduct by a Company employee or by any of your or your business partners' employees in connection with Company business, we expect you to promptly notify us. Individuals reporting an issue may contact us on an anonymous or self-identified basis through the Amsted Corporate Compliance Helpline at amsted.ethicspoint.com or via the toll-free phone numbers listed on that site. You must promptly investigate reports of legal or ethical issues or concerns.

Environmental, Health & Safety

Environmental Laws, Sustainability and Water Quality. Suppliers shall conduct operations in full compliance with applicable federal, state, and local environmental laws, regulations, and directives, including but not limited to those regarding the handling of hazardous waste and GHG emissions. Suppliers are expected to understand the environmental risks and impacts of their operations, and to implement risk and impact reduction policies that safeguard the environment, minimize waste, emissions (to air, water, and soil), energy consumption, and the use of natural resources and materials of concern. Suppliers shall identify and implement policies to reduce waste and pollution entering waterways and strive to reduce water usage. You must also assure safe and healthy work environments for your employees and business invitees.

Provide Healthy and Safe Working Conditions. Suppliers must provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation. It is expected that suppliers will ensure that all workers receive training and regular communications regarding emergency planning and safe work practices. You are also expected to perform regular risk assessments and put in place corrective and preventative measures to minimize workplace hazards, and provide appropriate Personal Protective Equipment so that employees can complete their jobs safely.

Reporting Matters Related to the Code

For questions or concerns about this Code, including its application to specific circumstances in connection with your organization's performance of work for the Company, or suspected failures by your organization to satisfy these expectations in performing work for the Company, please contact the Amsted Corporate Compliance Helpline at amsted.ethicspoint.com or via the toll-free phone numbers listed on that site.