



Code of Conduct

Addendum 1 in Employee Handbook

1. Introduction

- **Purpose and Scope**

- This Code of Conduct outlines the ethical principles and standards that govern the activities of all employees and partners of Allied Metals Corporation worldwide. It serves as a guide for professional conduct in all business dealings and relationships, both internal and external. Compliance with this Code is mandatory and integral to our commitment to ethical business practices.
- These same standards also extend to our suppliers and other business partners, who are expected to uphold the same principles.

- **Core Values**

- At Allied Metals Corporation, we are committed to upholding the highest standards of integrity, respect, accountability, and excellence. We expect all members of our organization to embody these values in their daily work.

2. Human Rights and Labor Practices

- **Prohibition of Human Trafficking and Forced Labor**

- We are steadfast in our commitment to human rights and strictly prohibit any form of human trafficking, forced labor, or slavery within our operations and supply chains. This includes practices such as debt bondage, involuntary prison labor, and the trafficking of individuals. All work must be voluntary, and employees must have the freedom to terminate their employment at any time, following reasonable notice and in accordance with applicable laws.

- **Child Labor**

- We do not engage in or support the use of child labor. We adhere to international standards and local laws to ensure that no underage individuals are employed within our operations or those of our suppliers. We require proof of age documentation for all employees.

- **Freedom of Association and Collective Bargaining**

- We respect the rights of employees to associate freely, join labor unions, and participate in collective bargaining as permitted by local laws. We are committed to open communication and dialogue with employees and their representatives. We do not discriminate against or retaliate against employees who choose to exercise these rights.

- **Fair Wages and Benefits**
 - We are dedicated to providing fair and competitive compensation packages. Wages are based on market rates and exceed the legal minimum wage in the countries where we operate. We provide all legally mandated benefits, including health insurance, retirement plans, and paid leave. Overtime is compensated in accordance with local laws, and we ensure transparency in all payroll practices.
- **Working Hours**
 - We comply with all applicable laws regarding working hours.

3. Non-Discrimination and Harassment

- **Equal Opportunity Employment**
 - We are an equal opportunity employer committed to fostering a diverse and inclusive workplace. All employment decisions, including hiring, promotion, compensation, and training, are made without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, ethnicity, age, disability, marital status, veteran status, or any other characteristic protected by applicable laws.
- **Anti-Harassment Policy**
 - Harassment of any kind is strictly prohibited. This includes but is not limited to verbal abuse, physical harassment, unwanted sexual advances, and any behavior that creates a hostile or offensive work environment. We are committed to providing a safe and respectful workplace where all employees can perform their duties free from intimidation or harassment. Complaints of harassment are taken seriously and investigated promptly, with appropriate disciplinary action taken against those found responsible.
- **Reasonable Accommodations**
 - We are committed to providing reasonable accommodations to qualified individuals with disabilities, as well as to those with sincerely held religious beliefs, unless doing so would cause undue hardship to the company. Employees needing accommodations should contact the Human Resources department.
- **Reporting Discrimination and Harassment**
 - Employees who experience, or witness discrimination or harassment are encouraged to report the incident to their supervisor or Human Resources. All reports will be handled with sensitivity and confidentiality, and retaliation against individuals who report such incidents is strictly prohibited.

4. Conflict Minerals

- **Responsible Sourcing**

- We are dedicated to the responsible sourcing of minerals used in our products. We recognize the potential for certain minerals to be associated with human rights abuses and conflicts, particularly tin, tantalum, tungsten, and gold (3TG minerals) from conflict-affected and high-risk areas. We commit to exercising due diligence to ensure that our sourcing practices do not contribute to armed conflict or human rights violations.
- **Continuous Improvement**
 - We will continuously improve our supply chain due diligence efforts and collaborate with suppliers, customers, and other stakeholders to promote responsible mineral sourcing.

5. Environmental Responsibility

- **Compliance with Environmental Laws**
 - Compliance with all applicable environmental laws and regulations is mandatory. This includes adhering to laws related to emissions, waste disposal, chemical handling, and resource conservation.
- **Employee Involvement**
 - We encourage employees to be actively involved in environmental initiatives. Suggestions for improving environmental performance are welcomed.

6. Business Ethics

- **Anti-Corruption and Bribery**
 - Integrity is fundamental to our business. We comply with all anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and applicable local laws in the countries where we operate. Employees and agents of Allied Metals Corporation are prohibited from offering, promising, giving, or authorizing anything of value, directly or indirectly, to any person, including government officials, for the purpose of obtaining or retaining business or securing any improper advantage.
- **Conflicts of Interest**
 - Employees must avoid any situation where personal interests could conflict with the interests of Allied Metals Corporation. This includes outside employment, financial interests, or personal relationships that could influence or appear to influence decision-making. Employees are required to disclose any potential conflicts of interest to their supervisor.
- **Fair Competition and Antitrust**
 - We believe in competing vigorously and fairly in the marketplace. We comply with all antitrust and competition laws, which prohibit agreements or actions that restrain trade or reduce competition. This includes not engaging in price-fixing, bid-rigging, market allocation, or abuse of market dominance. Employees must avoid

discussions or agreements with competitors regarding pricing, terms, or other competitive information.

- **Accurate Books and Records**

- We maintain accurate and complete financial and business records in compliance with all applicable laws and accounting standards. Falsifying records or misrepresenting facts can constitute fraud and is strictly prohibited. All transactions must be documented appropriately, and records must be retained in accordance with our record-keeping policies.

- **Compliance with Economic Sanctions Laws**

- We are committed to adhering to all applicable economic sanctions laws and regulations imposed by governments and international organizations. This includes sanctions administered by the United Nations, the United States (such as those by the Office of Foreign Assets Control [OFAC]), the European Union, and other relevant authorities.

- **Prohibited Business Activities**

- We do not engage in any business transactions with individuals, entities, or countries that are subject to economic sanctions or embargoes. Employees must ensure that all dealings comply with current sanctions programs and avoid any activities that could violate these laws.

- **Money Laundering, Insider Dealing, and Gifts & Entertainment**

- Money laundering is strictly prohibited, and any suspicious activity must be reported to relevant authorities. Insider dealing using inside information for personal gain is forbidden. Gifts or entertainment must never be solicited, and any offering or acceptance must be lawful and aligned with legitimate business practices.

- **Timely Payment**

- We commit to honoring all contractual payment terms.

7. Data Protection, Confidentiality, and Cybersecurity

- **Commitment to Data Protection**

- We are dedicated to protecting the personal and sensitive information of our employees, customers, partners, and stakeholders. We comply with all applicable data protection laws and regulations and relevant local laws in the countries where we operate.

- **Confidential Information**

- All employees are expected to maintain the confidentiality of proprietary and sensitive information. This includes trade secrets, intellectual property, financial data, customer lists, and any non-public information that could be valuable to competitors or harmful to the company or its stakeholders if disclosed.

- **Cybersecurity Practices**

- We are committed to implementing robust cybersecurity measures to protect our information systems from unauthorized access, cyberattacks, and other security threats. Employees must adhere to all cybersecurity policies and procedures, including the use of approved security software and following protocols for secure communication.

8. Workplace Health and Safety

- **Commitment to a Safe Workplace**

- We are dedicated to providing a safe and healthy work environment. Employees must follow all safety policies and procedures, use required protective equipment, and report any accidents, injuries, or unsafe conditions immediately.

- **Compliance with Health and Safety Laws**

- We comply with all applicable occupational health and safety laws and regulations. Regular training and assessments are conducted to ensure ongoing compliance and improvement.

9. Community Relationship

- **Commitment to the Community**

- We recognize the importance of being an active and positive presence in the communities where we operate. Our company is dedicated to contributing to the social and economic well-being of these communities through responsible business practices and community involvement.

- **Open Communication and Feedback**

- We maintain open lines of communication with community members and stakeholders. Feedback is welcomed and valued, as it helps us understand community concerns and expectations, allowing us to respond effectively.

10. Customer Relationship

- **Respect and Fairness**

- We treat all customers with respect, fairness, and honesty.

- **Quality**

- Our products and services meet high standards of quality and safety. We regularly monitor and respond to customer feedback.

11. Supplier Relationship

- **Transparency and Communication**

- We encourage open dialogue with suppliers, which can include sharing relevant information or discussing potential risks.

- **Continuous Improvement**

- We work collaboratively with suppliers, offering guidance and resources, when feasible, to foster ongoing improvement in areas such as quality, sustainability, and social responsibility.

12. Implementation and Training

- **Manager Responsibilities**

- Managers and supervisors have an additional responsibility to model ethical behavior, promote compliance, and support their teams in understanding and adhering to this Code. They should foster an environment where employees feel comfortable raising concerns and ensure that any reports of misconduct are addressed appropriately.

- **Employee Acknowledgment**

- Employees are required to certify their understanding and commitment to this Code of Conduct upon hiring. Acknowledgment is a condition of continued employment and signifies the employee's agreement to comply with the company's ethical standards.

- **Non-Retaliation**

- We prohibit retaliation against anyone who reports violations or assists in investigations.

13. Continuous Improvement

- **Feedback and Updates**

- We value employee input on how we can enhance our ethical practices and the effectiveness of this Code of Conduct. We review all input and consider it in our ongoing efforts to improve. We are committed to regularly reviewing and updating this Code of Conduct to reflect changes in laws, regulations, and industry best practices.

14. Whistleblowing and Grievance Mechanism

- We rely on the voices of others to help protect our values. If you see or suspect wrongdoing, whether safety, ethical, legal, environmental, or human-rights related, report it immediately. You can submit information through our confidential grievance mechanism by clicking “Report a Concern” on our website.

15. Conclusion

- Our commitment to ethical conduct is essential to our success and reputation. Each employee plays a critical role in upholding the values and standards outlined in this Code of Conduct. By working together with integrity and respect, we can achieve our business goals while making a positive impact on our customers, communities, and the world.