



## **SUPPLIER CODE OF ETHICS**

**Moltec International** is committed to:

- Conduct business in a professional, ethical and honest manner
- Comply with the law wherever we conduct business

**Moltec International** expects its Suppliers and their Sub-Suppliers to:

- Conduct business in a professional, ethical and honest manner
- Comply with all applicable laws wherever they do business, including laws relating to employment, human rights, the environment and health and safety

**Moltec International** will not deal with Suppliers or Sub-Suppliers who do not comply with the expectations set in this Code.

**Moltec International** reserves the right to update this Code of Ethics from time to time.

### 1. **Governing Principles**

#### a. **Conflicts of Interest**

**Suppliers should not engage in any activity that results in an actual or perceived conflict of interest.**

- **Entertainment, gifts and payments:** Providing or receiving gifts of money, goods or services solely for personal use, personal discounts, loans, gift of non-business related travel or accommodations, personal favors or any other benefit which might influence or raise doubts as to the impartiality of the recipient and damage the reputation of Moltec International for fair dealing are prohibited.  
Certain business courtesies such a payment of a reasonable amount for lunch or dinner in connection with a business meeting would not be considered a gift within the context of this policy.  
Advertising novelties of insignificant value would not be inappropriate to give or receive if widely distributed to others under the same business relationship with the donor.
- **Arm's length dealings:** Suppliers may only deal with Moltec International employees who can be stated as being 'at arm's length' to the Supplier.
- **Illegal payments:** Offering or accepting bribes, kickbacks or improper payments of any kind is strictly prohibited.

#### b. **Compliance with Laws, Rules and Regulations**

**Suppliers must comply with all laws and regulations governing their place of business and shall not, at any time, take known actions to violate such, including but not limited to:**

- **Health and safety:** Suppliers are expected to follow safe work practices and comply with all of the applicable guidelines related to their work. Suppliers are responsible for the health, safety, and continuous training of their employees and are expected to minimize risks and implement best possible preventive measures against accidents and occupational illness.
- **Human Rights:** Suppliers must adhere to their local employment laws such as maximum hours of daily labor, rates of pay, minimum age, privacy and other fair working conditions. Child labor must be strictly prohibited. Suppliers must promote equal opportunities and treatment of their employees, irrespective of skin, colour, race, religion, social origin, sexual orientation, political belief, sex or age.
- **Anti-Slavery and Human Trafficking:** Suppliers must not engage in the use of forced or enslaved labour or human trafficking, nor tolerate their use at any level in its supply chains. Suppliers must not demand any work or service from any person under the menace of any penalty. Moltec has implemented these practices to help ensure that workers are not subject to any form of forced, compulsory, bonded or indentured labour and that all work is voluntary.
- **Environmental Responsibility:** Moltec International is committed to monitoring and reducing our direct environmental impacts especially with regards to air emissions, raw material use, and waste generation and expects Suppliers to do the same. Suppliers must comply with all environmental laws and regulations in the locations in which they conduct their business.
- **Working Hours:** Suppliers will comply with local laws and collective bargaining agreements (where applicable) regarding working hours. Working hours must not exceed the maximum set by local law.
- **Wages and Benefits:** Suppliers will pay wages and provide benefits and compensation to workers that comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours, medical leave, and legally mandated benefits, and consistent with the concepts in Article 7 of the International Covenant on Economic, Social and Cultural Rights. Suppliers will refrain from making any deductions from wages as a disciplinary measure or imposing any financial burdens on workers related to recruitment costs. Workers

shall receive equal pay for equal work, including paying a fair wage that meets or exceeds legal minimum standards. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law. In the absence of local law, the wage rate for student workers, interns, and apprentices should be at least a substantially similar wage rate as other entry-level workers performing equal or similar tasks. Workers must be paid directly, in a timely fashion, and in recognized currency. Suppliers will keep records of worker hours and wage documentation in accordance with local law.

- **Emergency Preparedness:** Suppliers will work to actively identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures. Suppliers will execute emergency drills as required by local law.
- **Occupational Injury and Illness:** Suppliers should have procedures and systems to prevent, investigate, root cause, manage, track, and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases, and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.
- **Conflict and Critical Minerals:** Responsible mineral sourcing can fuel growth and generate income for local communities. At the same time, mineral sourcing operations are at risk for serious human rights and financial abuses including funding armed terrorist groups. Suppliers are required to provide Conflict Minerals Reporting Templates as requested.

## 2. Reporting of Violations and Other Illegal or Unethical Behavior

Any Supplier or Supplier's employee who become aware of illegal or unethical behavior and/or any violation of this Code of Ethics has a responsibility to report his or her knowledge promptly in writing to [ethics@moltecinternational.com](mailto:ethics@moltecinternational.com). If not required by law, persons reporting concerns may request to remain anonymous. Moltec International makes every effort to protect the confidentiality of information provided, unless maintaining confidentiality would create a significant health, safety or legal risk.

## 3. DATA PROTECTION / CYBERSECURITY

Moltec complies with all applicable laws related to data protection and cybersecurity, and has implemented and maintained a robust cybersecurity program to mitigate threats to their internal systems. This includes cybersecurity awareness training for all of the officers and employees. Moltec requires their suppliers to commit to the same principles and programs.

## 4. RESPECT AND COLLABORATION

Moltec International believes that successful business relationships are the result of mutual goals and values and built upon respect and collaboration. We also believe every relationship is an opportunity to extend our enterprise and grow our mutual businesses. We expect open, honest, and timely communication with our Suppliers and Customers, which is necessary to build relationships and collaborate effectively.

## 5. NO RETALIATION

Moltec will not permit retaliation of any kind against good faith reports or complaints of violations of this Code or other illegal or unethical conduct.

## 6. AMENDMENT, MODIFICATION AND WAIVER

This Code may be amended, modified or waived by Moltec Executive.

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