

# CHRISTY METALS™ INC.



## SLAVERY AND HUMAN TRAFFICKING STATEMENT

The California Transparency in Supply Chains Act of 2010 requires companies doing business in California to disclose efforts to eliminate slavery and human trafficking from their supply chains. This statement details the systems and controls that Christy Metals has in place to safeguard against slavery and human trafficking in its business and supply chain.

Christy Metals Corporation is committed to ensuring that its employees and suppliers have processes in place to mitigate the risk of human trafficking and slavery from occurring in its business and supply chain.

### Verification of the Supply Chain

*Supplier Code of Conduct:* Christy Metals prohibits any form of forced labor, including slavery and human trafficking, in our supply chain, and has issued the [Christy Metals Supplier Code of Conduct](#) (the "Supplier Code"). The Supplier Code specifically forbids the use of involuntary or forced labor, including unlawful child labor, and requires that suppliers comply with all applicable laws and regulations regarding slavery and human trafficking. The Supplier Code also requires suppliers to ensure that their subcontractors and agents comply with the Supplier Code, and have adequate monitoring and record keeping systems in place to ensure compliance. In addition, Christy Metals requires that suppliers annually acknowledge their understanding of, and compliance with, the Supplier Code. Under the Supplier Code, Christy Metals reserves the right to monitor, review and verify compliance with the Supplier Code.

*Conflict Minerals:* Christy Metals is committed to conducting business so as to protect people and the environment. Christy Metals works with its suppliers to take appropriate actions to ensure that our products do not contain substances identified as conflict minerals under Section 1502 of the Dodd-Frank Act that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or an adjoining country. These actions include conducting reasonable country of origin inquiries and, as necessary, obtaining reliable

information on the origin of all conflict minerals that might possibly originate in the DRC or an adjoining country.

## Internal Accountability Standards

Christy Metals will never use forced, indentured or involuntary labor in any of its operations, nor will it tolerate any instances of slavery or human trafficking. Christy Metals will also never conduct business with any third parties who engage in human trafficking or other forced labor.

This pledge is set forth in Christy Metals' [Code of Conduct](#) (the "Code"). The purpose of the Code is to ensure that Christy Metals conducts business with the highest standards of ethics and integrity and that all Christy Metals employees, officers and directors comply with all company policies, applicable laws and regulations. Any employee, officer, director or supplier who violates these policies is subject to discipline, up to and including termination.

## Training

Annual training is provided to employees on the Christy Metals Code of Conduct. This training addresses the mitigation of the risk of slavery and human trafficking within the supply chain. The employees and management who have direct responsibility for the supply chain are aware of their obligation to mitigate these risks and are empowered to immediately address and resolve any event of potential noncompliance.