

CHRISTY METALS™ INC.



SUPPLIER CODE OF CONDUCT Revised July 15, 2020 Page 1 of 3

SUPPLIER CODE OF CONDUCT

Legal Compliance

Suppliers must comply with all laws and regulations in their country of operation, and with all other applicable laws and regulations

Business Integrity

Bribes, kickbacks, illegal political contributions or other improper payments to customers, government officials or third parties are strictly prohibited. Suppliers must not directly nor indirectly give or receive improper business advantage by giving or receiving anything of value in exchange for preferential treatment. Christy Metals Code of Conduct prohibits Christy Metals employees from soliciting personal gifts, money, loans or personal discounts from Christy Metals suppliers and from engaging in any business entertainment that is not customary or reasonable in value.

Protecting Intellectual Property

Suppliers must respect intellectual property rights and safeguard all Christy Metals confidential and proprietary information.

Child Labor

Suppliers must comply with local laws regarding the minimum age of employees. In addition, Suppliers must comply with all legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, working conditions, and the handling of certain materials.

Forced Labor and Human Trafficking

Suppliers shall not use any form of involuntary or forced labor or indentured, bonded or prison labor. Suppliers shall not use, condone nor participate in any form of slavery or human trafficking.

Health and Safety

Suppliers must provide employees with a safe and healthy working environment that includes appropriate controls, safety procedures, preventative maintenance, and protective equipment. Practices must comply with all relevant local and national laws. Suppliers must implement management systems to meet these requirements.

Freedom of Association

Suppliers must respect the legal rights of employees to join or refrain from joining worker associations. Suppliers must also respect any legal right of employees to bargain collectively.

Non-Discrimination

All terms of employment -- including hiring, payment, benefits, training, promotion, termination and retirement -- should be based on an individual's ability to do the job and performance. Suppliers shall not discriminate against employees based on age, disability, ethnicity, marital or family status, national origin, race, color, religion, sex, sexual orientation, or any other characteristic protected by law.

Harassment

Suppliers must treat all employees with respect and dignity. No employees shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.

Wages, Benefits and Working Hours

Suppliers must provide wages at least equal to the applicable legal minimum wage and any associated benefits. If there is no legal minimum wage, suppliers must ensure that wages are at least comparable to those at similar companies in the local area or to prevailing industry norms. Suppliers must not exceed prevailing local work hours and must appropriately compensate overtime. In addition, except in extraordinary business circumstances, all workers are entitled to at least one day off in every seven-day period.

Protection of the Environment

Suppliers are expected to operate in a manner that is protective of the environment. At a minimum, suppliers must fully comply with all applicable environmental laws applicable to the workplace, the products produced and the methods of manufacture. Suppliers should further strive to conduct their operations in a way that minimizes exposure to potentially hazardous materials, conserves natural resources, and encourages development of environmentally friendly technologies.

Counterfeit Materials

Suppliers shall establish systems that will stop any counterfeit products or material being introduced into the supply chain.

Conflict Minerals

Suppliers shall ensure that their products do not contain tin, tantalum, tungsten or gold that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or an adjoining country. Suppliers are expected to exercise due diligence on the source and chain of custody of such minerals in accordance with generally accepted international standards and make such due diligence measures available upon request. Christy Metals' Conflict Minerals Policy can be found at <https://ChristyMetals.com>.

Suppliers and Subcontractors - Assurance of Compliance

Suppliers must adopt or establish a management system designed to ensure compliance with this Code and applicable laws and regulations; identify and mitigate related operational risks; and facilitate continuous improvement in these matters.

In addition, suppliers are expected to have adequate monitoring and record keeping systems to verify compliance. Suppliers are also responsible for ensuring that their subcontractors and agents comply with this Code. Christy Metals reserves the right to monitor, review and verify compliance with this Code

Anonymous Reporting and Whistleblower Protection

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances and illegal or unethical conduct. Suppliers shall protect whistleblower confidentiality and prohibit retaliation.

Violations

Suppliers must report known violations of this Code to Christy Metals. To report violations of this Code by suppliers, subcontractors, employees or any representative doing business on behalf of Christy Metals, please contact Quality Manager Les Rostkowski at 847 729 5744.

Anti-Corruption

Suppliers must comply with the U.S. Foreign Corrupt Practices Act (FCPA) <https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>, as well as other applicable anti-corruption laws and regulations within their country of operation. Christy Metals has a strict, zero tolerance policy for corruption. Ensuring compliance with anti-corruption laws is vital to the business interests of Christy Metals. This principle applies to all Christy Metals transactions worldwide – without exception.

Conflicts of Interest

Suppliers shall act fairly, objectively and avoid all conflicts of interests when doing business with Christy Metals. This includes even the appearance of any potential conflict of interest. Suppliers are expected to report any potential, perceived, or actual, conflict of interest that may arise in the course of business with Christy Metals.

Fair Competition. Anti-trust

Suppliers must comply with all applicable competition and anti-trust laws and regulations when conducting business. Christy Metals is committed to providing only honest and truthful information and Christy Metals will not engage in any illegal activity or behave in an unethical manner when conducting business. This same level of commitment is expected of our suppliers.

Trade Compliance

Suppliers involved with the sale and distribution of Christy Metals' products and services are expected to know and follow all applicable export and import control laws and Christy Metals' policies regarding trade compliance.

Accurate Accounting/Records Management

Suppliers are expected to maintain accurate and complete business records. Records such as company reports, accounts, financial statements, regulatory reports and publicly filed documents should comply with all applicable and accepted accounting principles and statutory requirements.