



Document type/group
Code of Conduct

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The Code of Conduct

Distribution
Public

Created by
Kim George

Approved by
Board of Directors

Approval Date
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SUPPLIER CODE OF CONDUCT

Governed by the laws of the State of Louisiana, United States

1. Purpose and Scope

This Supplier Code of Conduct (the “Code”) sets out the minimum standards Nord Metallics and its subsidiaries, affiliates, and project entities (collectively, “Nord Metallics”) expect from suppliers, contractors, subcontractors, consultants, vendors, agents, intermediaries, and any other third parties providing goods, services, equipment, materials, systems, labor, technology, logistics, or support to Nord Metallics (each, a “Supplier”).

Nord Metallics is developing large-scale industrial and metallics projects that depend on disciplined execution, responsible procurement, lawful conduct, and credible long-term partnerships. Suppliers are expected to conduct business in a manner that protects people, respects communities, supports safe and reliable operations, and upholds the integrity of Nord Metallics’ projects and supply chain.

This Code applies to all work performed for or on behalf of Nord Metallics and extends to the Supplier’s own subcontractors, lower-tier suppliers, labor providers, and other business partners engaged in connection with Nord Metallics-related work. Suppliers shall communicate applicable requirements of this Code throughout their supply chain and shall take reasonable steps to ensure compliance.

2. Core Supplier Obligations

Each Supplier shall, at a minimum:

- comply with all applicable laws, regulations, permits, and binding contractual requirements in every jurisdiction where it operates or performs work for Nord Metallics;
- conduct its business honestly, lawfully, safely, and professionally;
- maintain management systems, controls, and records reasonably sufficient to demonstrate compliance with this Code;
- promptly address identified deficiencies, risks, or violations and cooperate in good faith with Nord Metallics in connection with any review, inquiry, or corrective action process; and
- avoid conduct that could expose Nord Metallics, its projects, personnel, investors, or stakeholders to undue legal, operational, environmental, safety, reputational, or ethical risk.

3. Human Rights and Labor Practices

Nord Metallics expects Suppliers to respect internationally recognized human rights and to provide working conditions consistent with lawful, fair, and dignified treatment of workers. Suppliers shall avoid causing, contributing to, or knowingly benefiting from human rights abuses in their operations or supply chain.



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3.1 Freedom of Association and Collective Dialogue

Suppliers shall respect workers' lawful rights to organize, join or refrain from joining lawful associations, and engage in collective dialogue or bargaining to the extent provided by applicable law. Where local law restricts such activity, Suppliers should provide lawful alternative channels for workers to raise concerns and communicate with management without fear of retaliation.

3.2 Forced Labor, Human Trafficking, and Child Labor

Suppliers shall prohibit all forms of forced labor, prison labor not permitted by law, bonded labor, indentured labor, modern slavery, and human trafficking. Employment must be voluntary. Workers shall not be required to surrender passports, identity documents, work permits, or deposits as a condition of employment, except as required by law and then only in a manner that does not restrict worker freedom.

Suppliers shall not employ any person below the minimum legal working age and, in any event, shall not employ children in work that is hazardous, dangerous, or likely to interfere with schooling, development, or well-being. Workers under the age of 18 shall not be assigned hazardous duties or work that violates applicable youth employment laws.

3.3 Non-Discrimination, Respect, and Fair Treatment

Suppliers shall provide a workplace free from unlawful discrimination, harassment, intimidation, retaliation, abuse, or bullying. Employment-related decisions shall be based on lawful business criteria such as qualifications, skills, performance, experience, and legitimate job requirements. Suppliers shall treat workers with dignity and respect and shall maintain processes for addressing complaints in a fair and timely manner.

3.4 Wages, Working Hours, and Terms of Employment

Suppliers shall provide workers with clear terms of employment and shall comply with applicable wage and hour laws, including minimum wage, overtime, payroll timing, legally mandated benefits, and required leave. Working hours, rest periods, and overtime practices shall comply with applicable law. Overtime should be managed responsibly and should not create unsafe, coercive, or abusive working conditions.

4. Health, Safety, and Operational Discipline

Nord Metallics places the highest importance on safety, operational integrity, and the prevention of harm.

Suppliers shall maintain a safety culture, systems, and field practices appropriate to the nature of their work, the hazards involved, and the regulatory environment in which work is performed.

- comply with all applicable occupational health and safety laws, rules, permits, and site requirements;
- identify, assess, and control workplace hazards through appropriate procedures, training, supervision, job planning, and risk management;
- provide workers with suitable personal protective equipment, training, and safety instructions at no improper cost to the worker;
- maintain emergency preparedness and response procedures appropriate to the worksite and risks involved;

- promptly report serious incidents, near misses with significant potential, regulatory citations related to Nord Metallica work, and unsafe conditions that could materially affect people, property, schedule, or operations; and
- support a stop-work culture where workers may raise safety concerns and halt unsafe work without retaliation.

5. Environmental Responsibility and Resource Stewardship

Suppliers shall conduct operations in a manner that complies with environmental laws and supports responsible industrial development. Nord Metallica expects Suppliers to manage environmental aspects with discipline, including emissions, wastewater, waste, chemicals, natural resources, land use, and potential impacts to surrounding communities.

- obtain and maintain all required environmental permits, approvals, registrations, and authorizations relevant to their operations;
- monitor, handle, transport, store, and dispose of waste and hazardous materials in accordance with applicable law and good industry practice;
- manage emissions, discharges, spills, and releases in a lawful and controlled manner, including prompt reporting where required by law or contract;
- use energy, water, raw materials, and other resources responsibly and seek practical opportunities to improve efficiency and reduce waste;
- maintain environmental controls, procedures, and employee training appropriate to the work being performed; and
- cooperate with Nord Metallica in providing product, process, sourcing, and environmental data reasonably required for project, customer, regulatory, commercial, or investor needs.

6. Business Integrity, Ethics, and Anti-Corruption

Suppliers shall conduct business honestly, fairly, and in full compliance with applicable anti-corruption, anti-bribery, anti-fraud, competition, and trade laws. Nord Metallica has zero tolerance for bribery, kickbacks, embezzlement, improper influence, or any other corrupt practice.

6.1 Anti-Bribery and Improper Payments

Suppliers shall not directly or indirectly offer, promise, give, request, receive, or authorize bribes, kickbacks, facilitation payments, or anything of value to obtain or retain business, secure an improper advantage, influence a decision, or otherwise act unlawfully or unethically. This requirement applies in dealings with private parties and public officials alike.

6.2 Gifts, Hospitality, and Entertainment

Suppliers shall not provide gifts, meals, travel, lodging, entertainment, favors, or other business courtesies to Nord Metallica personnel or representatives where such items could improperly influence, or appear to influence, business judgment. Any permitted business courtesies must be modest, lawful, infrequent, transparent, and consistent with Nord Metallica's policies and the circumstances.



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6.3 Conflicts of Interest

Suppliers shall avoid conflicts of interest and shall promptly disclose to Nord Metallics any actual, apparent, or potential conflict involving Nord Metallics personnel, decision-makers, project representatives, or related parties. This includes personal, familial, financial, or ownership relationships that could affect objectivity or create the appearance of undue influence.

6.4 Competition and Fair Dealing

Suppliers shall compete fairly and lawfully and shall not engage in bid rigging, price fixing, market allocation, improper exchange of competitively sensitive information, fraud, misrepresentation, or deceptive practices. Suppliers must provide truthful, accurate, and complete information in tenders, proposals, invoices, claims, certifications, and other communications with Nord Metallics.

7. Trade Compliance, Sanctions, and Responsible Sourcing

Suppliers shall comply with all applicable import, export, customs, economic sanctions, boycott, and trade control laws. Suppliers shall not cause Nord Metallics to violate any such laws and shall provide timely and accurate classification, origin, valuation, and trade compliance information as reasonably required.

Where relevant to supplied goods or materials, Suppliers shall maintain appropriate sourcing diligence, including with respect to restricted or high-risk materials, lawful origin, and supply chain traceability. Suppliers shall promptly notify Nord Metallics of any known or suspected sourcing issue, sanction exposure, customs hold, legal prohibition, or material supply chain risk that could affect Nord Metallics or its projects.

8. Information Security, Confidentiality, and Data Protection

Suppliers shall protect Nord Metallics' confidential information, intellectual property, technical data, commercial information, and other non-public information against unauthorized access, use, disclosure, alteration, loss, or destruction. Confidential information may only be used for the legitimate purposes authorized by Nord Metallics and in accordance with contractual obligations.

Suppliers that process personal information or access Nord Metallics systems, data, or operational technology shall maintain administrative, technical, and physical safeguards appropriate to the risks involved, the sensitivity of the information, and applicable law. Suppliers shall promptly report cybersecurity incidents, data breaches, ransomware events, unauthorized access, or other information security incidents that affect or could reasonably affect Nord Metallics.

9. Community Respect and Responsible Local Engagement

Nord Metallics expects Suppliers to conduct themselves professionally and respectfully in the communities where work is performed. Suppliers shall comply with lawful requirements relating to community interaction, site access, traffic, noise, environmental controls, and local engagement. Where appropriate and commercially reasonable, Suppliers are encouraged to support lawful local participation, workforce



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development, and responsible local procurement consistent with project needs, capability, safety, cost, schedule, and quality requirements.

10. Management Systems, Records, and Flow-Down

Suppliers shall maintain policies, procedures, training, internal controls, recordkeeping practices, and supervisory systems reasonably designed to support compliance with this Code. Records relevant to Nord Metallica work shall be accurate, complete, and retained for the period required by law, contract, or sound business practice.

Suppliers shall flow down applicable requirements of this Code to lower-tier suppliers, subcontractors, labor providers, and agents involved in Nord Metallica-related work and shall take reasonable steps to monitor compliance. Nord Metallica may require more specific contractual, technical, safety, environmental, cybersecurity, sourcing, or reporting requirements depending on the scope of supply.

11. Reporting Concerns and Non-Retaliation

Suppliers shall promptly report to Nord Metallica any known or suspected violation of this Code, any material legal or regulatory breach related to Nord Metallica work, any serious safety or environmental event, any corruption concern, or any other matter that could materially affect Nord Metallica, its projects, personnel, investors, customers, or stakeholders.

Suppliers shall not retaliate against any worker or person who, in good faith, raises a concern, reports misconduct, participates in an investigation, or refuses to engage in unlawful or unsafe conduct.

Reports or questions under this Code may be directed to: [Procurement / Legal / Compliance Contact Information].

12. Audits, Reviews, and Corrective Action

Subject to reasonable notice, confidentiality protections, site rules, and applicable law, Nord Metallica may assess Supplier compliance with this Code through questionnaires, certifications, document requests, interviews, meetings, performance reviews, or audits conducted by Nord Metallica or its designated representatives.

Suppliers shall cooperate in good faith with any such review and shall provide information reasonably requested to demonstrate compliance. Where Nord Metallica identifies deficiencies, the Supplier shall, unless otherwise directed, develop and implement a corrective action plan within a reasonable timeframe and provide status updates upon request.

13. Violations and Consequences

Failure to comply with this Code may constitute a material breach of the Supplier's relationship or agreement with Nord Metallica, subject to the terms of the applicable contract and the nature and severity of the issue.



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Depending on the circumstances, Nord Metallics may require corrective action, suspend work, withhold awards, remove personnel from the project, require enhanced oversight, terminate orders or agreements, or take any other lawful and contractually available action.

Nord Metallics reserves the right to take immediate action where required to protect safety, legal compliance, project integrity, confidential information, or business continuity.

14. Interpretation and Higher Standard

Suppliers shall comply with this Code, applicable law, and contractual requirements. Where this Code sets a higher standard than applicable law, Suppliers are expected to meet the higher standard to the extent permitted by law. Where a requirement in this Code would conflict with applicable law, the Supplier shall promptly notify Nord Metallics so that an appropriate, lawful, and risk-based solution may be considered.

15. Governing Law

This Code shall be governed by and construed in accordance with the laws of the State of Louisiana, United States, without regard to conflict of laws principles. Nothing in this Code limits any rights or remedies Nord Metallics may have under applicable law, equity, or contract.

16. Acknowledgment

Suppliers may be required to acknowledge in writing that they have received, reviewed, understand, and will comply with this Code and will communicate applicable requirements to relevant lower-tier parties.

Document Control

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