

The Code of Conduct

Nord Metallics and its subsidiaries

Purpose

This Code of Conduct sets the standards expected of Nord Metallics, its directors, officers, employees, consultants, contractors, and any person acting on the company's behalf. It is intended to guide sound judgment, lawful conduct, and responsible business practices across all operations, projects, and stakeholder interactions.

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1. Scope and application

This Code applies to all Nord Metallics personnel worldwide, including employees, officers, directors, temporary staff, consultants, secondees, and contractors to the extent required by contract or by the nature of their engagement.

It applies in the office, at project sites, during travel, in virtual communications, at conferences, in dealings with customers, suppliers, regulators, communities, and any time an individual is representing or may reasonably be perceived to represent Nord Metallics.

This Code is not an exhaustive manual for every situation. It establishes minimum standards. Where a separate policy, procedure, law, contract, or permit requirement imposes a stricter standard, the stricter standard must be followed.

2. Our standards and expected conduct

Nord Metallics expects every person covered by this Code to act with integrity, professional discipline, respect for others, and sound commercial judgment.

We are building an industrial platform that depends on credibility. Our conduct must therefore reflect the standards expected of a serious long-term business partner, project developer, employer, and corporate citizen.

- We tell the truth and deal honestly.
- We keep our commitments and document our decisions properly.
- We respect people, property, communities, and the law.
- We ask questions when expectations are unclear.
- We stop work or escalate concerns when safety, legality, or integrity is at risk.

3. Compliance with law

Nord Metallics will comply with applicable federal, state, local, and foreign laws and regulations in every jurisdiction where it operates. This includes, without limitation, laws governing workplace safety, environmental protection, labor and employment, anti-bribery, sanctions, competition, privacy, securities, books and records, and interactions with public officials.

No one may direct, approve, or tolerate conduct that violates the law, a permit condition, a court order, a regulatory undertaking, this Code, or a company policy.

4. Health, safety, security, and fitness for duty

The protection of life, health, and property is a non-negotiable priority. No business objective, schedule, or commercial opportunity justifies unsafe work.

Nord Metallics is committed to building and operating a culture in which hazards are identified early, risks are assessed thoughtfully, controls are implemented rigorously, and lessons learned are shared promptly.

- Follow site rules, permits, procedures, and life-saving controls.
- Perform work only when trained, competent, authorized, and fit for duty.
- Report incidents, near misses, hazards, unsafe conditions, and security concerns immediately.
- Never work under the influence of alcohol, illegal drugs, or any substance that impairs safe performance.
- Protect coworkers, contractors, visitors, and surrounding communities through disciplined execution and intervention.

5. Human rights, dignity, and fair employment

Nord Metallics is committed to lawful, respectful, and fair employment practices. We support internationally recognized human rights and do not tolerate forced labor, modern slavery, human trafficking, unlawful child labor, abuse, intimidation, harassment, or unlawful discrimination.

We recruit, compensate, promote, and support people based on legitimate business criteria such as qualifications, performance, experience, and leadership, consistent with applicable law.



Document type/group	Title of the Document	Distribution
Code of Conduct	The Code of Conduct	Public
Created by Chaithra Nair	Approved by Board of Directors	Approval Date January 5, 2026

- We provide a workplace free from unlawful discrimination and harassment.
- We do not tolerate retaliation against anyone who raises a concern in good faith.
- We respect lawful rights relating to wages, hours, leave, benefits, organizing, and lawful freedom of association.
- We expect similar standards from suppliers, labor providers, and contractors.

6. Environment and responsible development

Nord Metallics is committed to responsible industrial development. Environmental stewardship is fundamental to how we design, permit, build, and operate projects.

We will strive to prevent pollution, reduce waste, use energy and resources responsibly, protect air, land, water, and biodiversity, and meet or exceed applicable permit and compliance requirements.

- Plan work to avoid or minimize environmental harm.
- Follow permit conditions, waste handling requirements, spill controls, and reporting obligations.
- Escalate any actual or potential environmental incident immediately.
- Support accurate measurement, documentation, and continuous improvement.

7. Anti-bribery, anti-corruption, and fair dealing

Nord Metallics has zero tolerance for bribery, kickbacks, facilitation payments, commercial corruption, fraudulent conduct, and improper influence of any kind.

No person acting for Nord Metallics may offer, promise, authorize, give, request, or accept anything of value in order to obtain an improper business advantage, influence a decision, secure favorable treatment, or cause another person to breach a duty.

- Conduct due diligence appropriate to the risk before retaining agents, intermediaries, consultants, or representatives.
- Maintain accurate books, records, invoices, and approvals; never disguise the true nature of a payment.
- Do not make unofficial payments to speed up routine government action unless there is an imminent threat to health or safety and the payment is lawful; any such situation must be reported immediately.
- Deal fairly with customers, suppliers, lenders, investors, and competitors.

8. Conflicts of interest, gifts, and outside activities

Each person covered by this Code must act in the best interests of Nord Metallics when performing work for the company. Personal interests must not interfere, or appear to interfere, with objective business judgment.

A conflict may arise where personal, family, financial, political, or outside business interests affect or appear to affect decision-making.

- Disclose any actual, potential, or perceived conflict promptly.
- Do not use company position, information, or opportunities for personal gain.



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- Do not supervise, hire, or influence decisions involving close relatives or household members without disclosure and approval.
- Gifts, meals, travel, entertainment, and hospitality must be lawful, reasonable, infrequent, transparent, and never intended to influence a decision.
- Outside employment, board service, advisory roles, and material personal investments that may intersect with Nord Metallics’ business must be disclosed and approved when required by company policy.

9. Competition, trade controls, and government interactions

Nord Metallics will compete lawfully and ethically. We do not engage in price-fixing, bid-rigging, unlawful market allocation, improper exchanges of competitively sensitive information, or other anti-competitive conduct.

We will comply with applicable trade sanctions, export controls, customs laws, anti-boycott requirements, and laws governing cross-border transactions.

- Do not discuss pricing, bids, margins, allocation of customers or markets, production levels, or other competitively sensitive topics with competitors except through lawful, approved channels.
- Screen transactions and counterparties as required by sanctions and trade-control rules.
- Keep customs, origin, shipping, and import/export documentation complete and accurate.
- Interactions with government officials must be truthful, respectful, well documented, and compliant with lobbying, procurement, ethics, and recordkeeping rules.

10. Confidential information, records, and data privacy

Information is a business asset. Confidential, proprietary, technical, financial, commercial, and strategic information belonging to Nord Metallics or to others must be protected and used only for legitimate business purposes.

Personal data must be collected, accessed, used, shared, retained, and disposed of in compliance with applicable privacy and data protection laws and company requirements.

- Share confidential information only on a need-to-know basis and with appropriate protections in place.
- Protect passwords, devices, networks, and systems from unauthorized access or cyber threats.
- Create and maintain accurate, complete, and timely records.
- Never destroy, conceal, falsify, or alter records improperly, especially during audits, investigations, litigation holds, or regulatory reviews.

11. Use of company assets and communications

Company assets—including funds, equipment, systems, documents, intellectual property, software, devices, and networks—must be used responsibly, lawfully, and primarily for legitimate business purposes.

Individuals must not misuse email, messaging platforms, expense accounts, procurement processes, or company authority.

- Safeguard company property from loss, theft, waste, fraud, and misuse.
- Follow approval authorities and procurement controls.
- Do not speak on behalf of Nord Metallics to the media, investors, or the public unless authorized.
- Use good judgment on social media and do not post confidential or misleading information about the company, its projects, partners, or stakeholders.

12. Reporting concerns and non-retaliation

Nord Metallics expects concerns to be raised promptly so they can be reviewed and addressed. Questions, suspected violations, unsafe conditions, misconduct, control failures, or requests for improper conduct should be reported without delay.

Reports may be made through a supervisor, project leadership, Human Resources, Legal, Compliance, or any other reporting channel designated by the company.

- Good-faith reporting is protected. Nord Metallics prohibits retaliation against anyone who raises a concern, participates in an investigation, or refuses to engage in suspected misconduct.
- People managers must never ignore or suppress a complaint. They must escalate it promptly through appropriate channels.
- Employees and contractors must cooperate honestly in internal reviews and investigations.

13. Governance, accountability, and enforcement

Compliance with this Code is a condition of employment or engagement. Leaders have enhanced responsibilities: they must model the right behavior, create an environment where concerns can be raised, and respond promptly when issues arise.

Violations of this Code may result in corrective action, discipline, termination of employment or engagement, removal from a project site, reimbursement obligations, referral to law enforcement, or other remedies allowed by law or contract.

- The Board oversees the company's ethics framework and may delegate administration to management.
- Management is responsible for implementation, communication, training, and controls.
- Legal, Compliance, Human Resources, EHS, Security, Finance, and project leadership each have responsibilities within their respective areas.
- This Code will be reviewed periodically and revised as needed.

14. Interpretation and governing law

This Code will be interpreted in a manner consistent with Nord Metallics' lawful business interests, good governance, and responsible industrial practice.

Except where mandatory law requires otherwise, this Code and any non-contractual matters arising from or related to it shall be governed by the laws of the State of Louisiana, without regard to conflict-of-law principles, together with applicable federal laws of the United States.



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Chaitra Nair	Board of Directors	January 5, 2026

Nothing in this Code alters the at-will nature of employment where at-will employment applies, creates a contract of employment, or limits the company's lawful rights to manage its business, workforce, projects, or sites.