

# USNR Supplier Code of Conduct

The following code of conduct applies to all suppliers to USNR, LLC and its subsidiaries and affiliates:

1. **PURPOSE:** This code sets out the expected minimum standards and behaviours for doing business with our suppliers and all parties in our supply chain, reinforced by the USNR values of openness, fairness, resilience, respect and integrity. We want to ensure that each of our suppliers (ie. any entity who does business with any company or division of USNR including any vendor or business partner (“Supplier”)) adheres to the same ethical standards.
2. **SCOPE:** This Code applies to all suppliers engaged by USNR. We incorporate these principles into all aspects of our procurement policy including tender processes, supplier terms of engagement and supplier audits. We will assess adherence to this Code by our Suppliers whether or not this Code is incorporated into our supplier contracts. The Code also applies to conduct related to all personnel engaged by the Supplier, regardless of whether they be casual, short-term or contracted workers or where they may be located.
3. **SAFETY:** Safety is USNR’s top priority. We require all suppliers to regularly assess all goods and/or services supply to ensure the health and safety of our customers, our employees, and all other stakeholders. We expect all suppliers within our supply chains to ensure that their facilities, procedures, and processes are of consistent and appropriate safety standards to:
  - Identify workplace hazards and minimize workplace injury;
  - providing appropriate equipment, tools, instruction, training and supervision for workers to safely carry out their duties;
  - have effective systems in place to ensure products and service delivery meet relevant standards and legislative requirements;
  - ensuring that workplace facilities and amenities meet the basic safety standard;
  - support workers to raise health and safety issues without fear of disciplinary action, discrimination and dismissal; and
  - ensure that systems, training and emergency equipment are in place to effectively respond to and manage incidents and emergencies.

USNR may audit supplier’s site(s) when deemed necessary, potential high risk may be present or when trading first commences.

All parties in our supply chain must comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illness. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Workers are to be adequately educated and trained in health and safety issues.

4. **ENVIRONMENT:** We are committed to the responsible management of our environment and will ensure our Suppliers and contractors share our commitment to sustainability through:
  - Minimized pollution, the generation of waste and responsible consumption of resources;

- compliance with all applicable legislation including implementing host country obligations under international law, codes of practice and regulatory frameworks; and
- effectively manage climate change and energy consumption through minimising greenhouse gas emissions and energy consumption.

USNR may audit supplier's site(s) when deemed necessary or where potential high risk may be present or when trading first commences.

5. **OUR PEOPLE:** We will promote and protect human rights throughout our business operations and are committed to a zero-tolerance approach to all forms of modern slavery practices in our supply chain. Suppliers within our supply chain must comply with applicable labor laws and regulatory standards, in respect of:

- Ensuring that there is no "Modern Slavery" in their supply chain, including slavery, servitude, forced labor, deceptive recruiting, forced marriage, debt bondage, trafficking in persons and child labor;
- Voluntary employment – Suppliers shall ensure that:
  - There is no forced, bonded or involuntary labor used in the Supplier's supply chain;
  - There is no punishment and/or mental or physical coercion;
  - Deductions from wages as a disciplinary action is not permitted.
- Discrimination in their supply chain on grounds of race, religion, colour, ethnic or national background, age, disability, political affiliation, union membership, gender, sexual orientation or marital status;
- Bullying and harassment in their supply chain;
- Minimum working age – Suppliers shall not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it shall be 15 years of age;
- Limits on working time and hours of work in their supply chain;
- Minimum wages, in which we expect our Suppliers to provide employees with a fair wage; and
- Workers in their supply chain being free to join or not join union/employee representations of their choice.

6. **ETHICS AND REGULATORY COMPLIANCE:** USNR will work only with companies which:

- Comply with all applicable laws and regulatory standards, and
- Demonstrate ethical behavior in their business activities and in their dealings with third parties.

We expect all Suppliers within our supply chains to reject corruption in all its forms including extortion and bribery and to avoid real or potential conflicts of interest.

A conflict of interest arises when an individual has a private/personal interest which could appear to influence their decisions. Such conflict of interest situations include a relationship by blood or marriage, partnership, business relationship business partnership or investment. The Supplier must disclose any actual or potential conflict of interest with USNR personnel of which it is or becomes aware of.

USNR will not have association with any company which is involved in forced labor, child slavery or any practice which is exploitative of children or exposes them to risk of harm. We will not enter into arrangements which restrict or potentially restrict fair competition in our relationships with customers, suppliers, and competitors. Reporting of any misconduct can be done through the company's ethics hotline.

The Supplier must comply with all laws applicable to its business as well as international anti-bribery, anti-corruption and money laundering laws, regulations, and standards. The Supplier must maintain financial records and reports according to international laws and regulations. The Supplier must not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official or act to secure improper advantage in order to obtain or retain business.

The Supplier should support the principles of the United National Global Compact, the U.N. Universal Declaration of Human Rights and the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work. This specifically applies to all aspects of human rights and fair labor practices set out above under "Our People".

7. **DATA PROTECTION AND DISCLOSURE INFORMATION:** Suppliers must adhere to relevant data protection and security laws and to respective regulations, in particular with regard to personal data of customers, employees, and shareholders. Suppliers must comply with all said requirements when personal data is collected, processed, transmitted used or retained.
8. **BUSINESS CONTINUITY PLANNING:** Suppliers must be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases, worker shortages). This preparedness especially includes business continuity and disaster recovery plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations.
9. **COMMUNITIES:** We respect and acknowledge the rights and interests of all those who live and work in the communities in which we operate and encourage all Suppliers to recognise their responsibilities to society and to the local communities in which they operate. We expect all Suppliers to ensure that their activities do not have any material adverse environmental or social impact upon local communities.
10. **GOVERNANCE:** USNR reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. We encourage our Suppliers to implement their own binding guidelines for ethical behaviour. Any material breach of the obligations stipulated in this Supplier Code of Conduct is considered a material breach of the contract by the Supplier.

USNR requires suppliers to notify us of any breaches (including any pending charges) of any laws related to Modern Slavery or Prohibited Business Practices as part of their commitment to full and frank disclosure for the protection of our business, our people, our customers, and the community.

Updated May 31, 2024.