

WNC Supplier Code of Conduct

This Code of Conduct is divided into five sections and outlines standards for labor, health and safety, the environment, ethics and management systems corresponding to the five sections and elements of the RBA Code of Conduct Version 8.0.

A. LABOR

Suppliers are committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are:

1. Prohibition of Forced Labor

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in facilities in addition to unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, worker dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language they can understand, that contains a description of the terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to their departing from their country of origin and there shall be no substitution or change(s) allowed to the employment agreement upon arrival in the receiving country unless these changes are made to meet local laws and to provide equal or better terms and conditions of employment. All work must be voluntarily undertaken, and workers shall be free to resign their position at any time or to terminate their employment without penalty if reasonable notice is given as per the worker's contract. Suppliers are to maintain documentation on all leaving workers in accordance with local laws, or if there is none then for a minimum of two years. Employers, agents and sub-agents' may not hold or

otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker. Suppliers shall only employ temporary workers from employment agencies for temporary and/or exchangeable tasks or supporting roles and shall gradually lower the percentage of temporary workers to meet local regulations.

2. Young Workers

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, shall be supported. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If hiring of child labor is identified, assistance/remediation shall be provided.

3. Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.

4. Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualifications. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates, or at 125% of their standard salary, whichever is greater. Deductions from wages as disciplinary measures shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

5. Non-Discrimination/Non-Harassment/Humane Treatment

Suppliers are committed to providing a workplace free of harassment and unlawful discrimination. There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Suppliers shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements at suppliers shall be clearly defined and communicated to employees. Workers shall be provided with reasonable sites for religious practices and reasonable facilities for disabilities. In addition, workers or potential workers shall not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

6. Freedom of Association and Collective Bargaining

Open communication and direct engagement between workers and management is the most effective way to resolve workplace and compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In accordance with these principles, suppliers shall respect the rights of all workers to

form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representation.

B. HEALTH and SAFETY

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. Management structures such as ISO 45001 and ILO Guidelines on Occupational Safety and Health should be followed. Suppliers are therefore committed to the following health and safety standards as a matter of policy:

The health and safety standards are:

1. Occupational Health and Safety

Potential for exposure of workers to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed by suppliers, then mitigated by using a hierarchy of controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not allowing pregnant women and nursing mothers to work in conditions which could be hazardous to them or their child and to provide reasonable facilities for nursing mothers.

2. Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response

procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Such plans and procedures shall focus on minimizing harm to life, the environment and property. Suppliers shall ensure that all certificates, licenses, and inspection/test reports for fire-response equipment (including fire-fighting equipment) and emergency needs have been acquired and shall implement a process to ensure all certifications and licenses are renewed in a timely manner. Ensure all smoke detectors, fire-fighting equipment, evacuation indications, evacuation routes, emergency exits, and emergency reporting processes are all effective to minimize hazards to members, the environment, and properties. Proper and adequate personal protective equipment (PPE) for emergency events shall be prepared for all employees. A post-disaster recovery plan shall be established.

3. Occupational Injury and Illness

Suppliers' workplace procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness including provisions to: (a) encourage worker reporting, (b) classify and record injuries and illness, (c) provide necessary medical treatment, (d) investigate cases and implement corrective actions to eliminate their causes, and (e) facilitate the return of workers to work. Suppliers shall allow workers to remove themselves from imminent harm, and not need to return until the situation is resolved, without fear of retaliation.

4. Industrial Hygiene

Suppliers shall identify, evaluate and control worker exposure to chemical, biological and physical agents according to the hierarchy of controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Suppliers shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and their working environment. Suppliers shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposure. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

5. Physically Demanding Work

Suppliers should identify, assess, and control worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

6. Machine Safeguarding

Suppliers should evaluate production and other machinery for potential safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

7. Sanitation, Food, and Housing

Suppliers should provide workers with ready access to clean toilet facilities and potable water as well as sanitary food preparation, storage, and eating facilities. Worker dormitories provided by suppliers or a labor agents are to be maintained clean and safe and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8. Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the workers can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in sites or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without fear of retaliation.

C. ENVIRONMENTAL

Suppliers recognize that environmental responsibility is integral to producing world-class products. Suppliers shall identify the environmental impacts and minimize adverse

effects on the community, environment and natural resources within their manufacturing operations, while safeguarding the health and safety of the public.

The environmental standards are:

1. Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

2. Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

3. Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Hazardous waste data shall be tracked and documented.

4. Solid Waste

Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations.

Supplier shall conduct routine monitoring of the performance of air emission control systems.

6. Materials Restrictions

Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

7. Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8. Energy Consumption and Greenhouse Gas Emissions

Suppliers shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2 and significant categories of Scope 3 greenhouse gas emissions are to be tracked, documented, and publicly reported. Suppliers are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, suppliers and their agents shall uphold the highest ethical standards including:

1. Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be

promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on the Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4. Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

5. Fair Business, Advertising and Competition

Suppliers are committed to upholding standards of fair business, advertising, and competition and take steps through the use of NDAs (Non-Disclosure Agreements) to safeguard customer information.

6. Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be developed by suppliers, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

7. Responsible Sourcing of Minerals

Suppliers shall adopt policies and exercise reasonable due diligence in the source and supply chain of tantalum, tin, tungsten, gold, and cobalt materials which fall under Section 1502 of the Dodd-Frank Wall Street Reform and the Consumer Protection Act and Regulation (EU) 2017/821 and make every effort to ensure the source of minerals in a way consistent with the Organisation for Economic Co-

operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

8. Privacy

Suppliers are commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

E. MANAGEMENT SYSTEMS

Suppliers shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Supplier's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

1. Company Commitment

Suppliers shall establish human rights, health and safety, environmental and ethics policy statements affirming Supplier's commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and

communicated to workers in a language they understand via accessible channels.

2. Management Accountability and Responsibility

Suppliers shall clearly identify senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

3. Legal and Customer Requirements

Establish a process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of the RBA Code of Conduct.

4. Risk Assessment and Risk Management

Suppliers shall adopt or establish a process to identify the legal compliance, environmental, health and safety and labor practices and ethical risks associated with suppliers' operations, including the risk of severe human rights and environmental impacts associated with suppliers' operations. Suppliers shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5. Improvement Objectives

Suppliers shall formulate written performance objectives, targets and implementation plans to improve the its social, environmental, and health and safety performance, including a periodic assessment of its performance in achieving those objectives.

6. Training

Programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

7. Communication

A process shall be established for communicating clear and accurate information concerning Supplier's policies, practices, expectations and performance to workers, suppliers and customers.

8. Worker Feedback, Participation and Grievance

Suppliers shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code and to foster continuous improvement. Workers must be assured of a safe environment to provide grievance and feedback without fear of reprisals or retaliation.

9. Audits and Assessments

Suppliers shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the RBA Code of Conduct, and customer contractual requirements related to social and environmental responsibility.

10. Corrective Action Process

Suppliers shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11. Documentation and Records

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12. Supplier Responsibility

Suppliers shall establish a process to communicate the RBA Code of Conduct requirements to suppliers and to monitor supplier compliance to the Code.

Reference

The following standards were used in preparing the RBA Code of Conduct and may be useful sources of additional information. The following standards may or may not be endorsed by each supplier.

- RBA Code of Conduct (Version 8.0)
https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf
- Dodd-Frank Wall Street Reform and Consumer Protection Act
www.sec.gov/about/laws/wallstreetreform-cpa.pdf
- Eco Management & Audit System
ec.europa.eu/environment/emas/index_en.htm
- Ethical Trading Initiative
<https://www.ethicaltrade.org/>
- ILO Code of Practice in Safety and Health
www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf
- ILO International Labor Standards
www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm
- ISO 14001
www.iso.org
- National Fire Protection Association
www.nfpa.org
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High Risk Areas
<https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>
- OECD Guidelines for Multinational Enterprises
www.oecd.org/investment/mne/1903291.pdf
- Universal Declaration of Human Rights
<https://www.un.org/en/universal-declaration-human-rights/>
- United Nations Convention on the Rights of the Child
<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

- United Nations Convention Against Corruption
www.unodc.org/unodc/en/treaties/CAC/
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>
- United Nations Global Compact
www.unglobalcompact.org
- United States Federal Acquisition Regulation
www.acquisition.gov/far/
- SA 8000
<https://sa-intl.org/programs/sa8000/>
- Social Accountability International (SAI)
www.sa-intl.org