



## Chief Enterprises, LLC Code of Conduct for Business Partners

### **Purpose**

This Code of Conduct for Business Partners articulates the expectations of responsible business behavior and establishes basic principles that Chief Enterprises, LLC (“Chief Enterprises”) encourages all its business partners to adhere to in the course of their business relationship with Chief Enterprises. The term “business partner” pertains to any individual or entity (including its officers and employees) that Chief Enterprises engages with, including but not limited to suppliers, vendors, contractors, subcontractors, and representatives who conduct business on Chief Enterprises’ behalf.

### **Principles**

Chief Enterprises is committed to responsible business practices and intends to demonstrate this commitment through integrity, corporate responsibility, and compliance throughout its supply chain. Business partners are expected to adhere to ethical standards and business practices for labor, health and safety, and environmental standards. By entering into a business relationship with Chief Enterprises, business partners are encouraged to:

- ensure their business is in compliance with applicable laws and regulations (with requirements for business partners to maintain awareness in regard to these laws and regulations) within the principles stated; and
- ensure that their employees are made aware of and comply with applicable laws and regulations; in particular, business partners are expected to retain due diligence to ensure compliance with these principles.

These principles cover Chief Enterprises’ expectations pertaining to safeguarding human rights and working conditions, environmental care, and doing business with integrity. Our principles

include requirements that are based on recognized principles that Chief Enterprises strongly supports:

- internationally recognized provisions and conventions, such as the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the relevant provisions of the International Labor Organization (ILO), Article 32 of the United Nations Convention on the Rights of the Child, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the OECD Guidelines for Multinational Enterprises.

Chief Enterprises also supports the United Nations Global Compact Initiative, a structured policy for businesses that are committed to the ten universally-accepted principles in areas such as environmental policies, labor, anti-corruption, and human rights.

### **Environmental Care**

Business partners are expected to support Chief Enterprises' efforts and commitment to safeguarding the environment and mitigating our overall impact on the environment throughout the supply chain. Our business partners should be in compliance with all applicable rules and regulations.

This involves taking a proactive approach towards minimizing the impact of their business activities on the environment. We expect our business partners to mitigate and manage the use of energy and other resources, recycling, storage of hazardous chemicals in a safe location, and waste and emissions management. Business partners shall strive to continuously improve their objectives towards environmental protection initiatives.

Business partners are expected to ensure that minerals and metals are extracted from areas free of human rights abuses, unethical business practices, and environmental damage. The exercise of due diligence is expected by our business partners to ensure metals and minerals are duly extracted. Chief Enterprises expects our business partners to cooperate with thorough transparency and traceability in regard to their 3TG (tin, tantalum, tungsten, and gold) supply chain.

Business Partners are expected to implement an environmental management system (EMS) which accompanies ISO 14001 or any similar environmental management system that is of industry standards (ex. ISO 14040, ISO 14044, ISO14067). Business partners should strive to implement all statutory environmental protection requirements and internationally recognized company environmental protection standards, in an appropriate manner.

Chief Enterprises also expects its business partners to apply precautionary measures whenever there is reasonable belief that a potential occurrence may have a negative impact on the environment; including, but not limited to, water consumption and quality, air and soil quality, and pollutants. To that end, business partners should seek and implement environmentally-friendly measures that are sustainable and legally compliant in their respective jurisdictions.

### **Working Conditions and Human Rights**

Chief Enterprises has been in operations for over 30 years and places high value on workers, sustainability, and workplace conditions. Our company is committed to providing working conditions that are parallel with international labor standards. In light of our business partners being a direct or indirect representation of Chief Enterprises, we expect the same standards to be reciprocated in regard to:

#### *Child Labor*

Business partners shall work to prevent all forms of child labor. Under no circumstances should employment be offered to any child that does not comport with state and local laws. Convention C138 of the International Labor Organization (ILO) should be used when no such state and local provisions exist. Under Convention C138, no child under the age of 15 shall be employed directly or indirectly, unless an exception applies under the Convention's C138 flexibility clauses.

#### *Forced Labor*

Chief Enterprises does not tolerate any form of forced labor relating to its business, products, or services. This restriction includes debt bondage, trafficking, or any other forms of modern

slavery. We expect our business partners to undertake the respect and rights of employees and to treat them in accordance with the rules and requirements of the international community.

### *Terms of Employment*

Business Partners are expected to provide working conditions for their employees that comply with all applicable legal requirements. Moreover, each employee shall have the right to receive written information, in a language that they can easily comprehend, specifying their terms and conditions of employment.

### *Wages and Benefits*

Business Partners should pay employees wages and benefits that either meet or exceed the legal minimum standards, collective bargaining agreements or any other appropriate binding industry standards, whichever is higher. Deductions are accepted only in accordance with applicable law, regulations and collective bargaining agreements. Deductions from wages as a disciplinary measure should not be permitted. Information about wages and benefits should be accessible to all employees, in a language that they can easily comprehend, timely, and in accordance with applicable laws. Chief Enterprises encourages its business partners to provide their employees with a total compensation that is sufficient to cover basic needs and enable an adequate standard of living. Business partners are also encouraged to systematically strive to ensure fair wages.

### *Collective Bargaining*

Business Partners should respect the rights of their employees to legally form, join or dismiss themselves from employer-employee relationship-related associations and to bargain collectively, where permissible by jurisdictional laws. Business Partners should also ensure that employees are given the opportunity to discuss their working conditions with management without fear of repercussion.

### *Health and Safety*

Workplace safety should always be the impetus in any decision. Business Partners are encouraged to provide and maintain a safe and healthy working environment that meets, and preferably exceeds, industry standards and legal requirements.

### *Equal Opportunity*

Business Partners should not engage in any form of discrimination based on gender, religion, age, disability, sexual orientation, nationality, ethnicity, political stance, union affiliation, social background or other characteristics protected by applicable law. All employees should be treated with respect, dignity and common courtesy.

### **Ethical Business Practices**

Chief Enterprises' relationship with its business partners should consist of trust, accountability, and transparency. Business partners are expected to conduct their business transactions with integrity and ethical standards. Chief Enterprises expects its business partners to conduct business in an ethical manner throughout the supply chain pursuant to applicable law, including but not limited to:

#### *Anti-Corruption*

Our business partners should conduct their operations and transactions within the scope of rules and regulations with regards to anti-corruption and anti-bribery. Business partners should refrain from engaging in any action or omission that may potentially be viewed as any form of corruption or bribery. Conversely, business partners should also ensure that they not render or receive any and all forms of inappropriate gifts, favors, or hospitality with the intent to influence business transactions whether involving private individuals or government entities. Chief Enterprises expects its business partners to make decisions solely on the premise of objectivity and are not influenced by personal interests or financial gain.

#### *Conflict of Interest*

Any and all occurrences that may involve conflicts of interests between Chief Enterprises and its business partners are to be avoided if they might conflict or appear to conflict with respective business interests. Irrespective of the circumstances, if business partners suspect that in a course of business that they have pursued, or are presently pursuing, or projecting to pursue that may involve them in a conflict of interest, they should immediately contact and convey all the facts to Chief Enterprises management division, or any compliance contacts that they are notified of.

### *Fair Competition and Business Practices*

Chief Enterprises strives to act at all times as a fair and responsible market participant and expects the same from its business partners. Thus, business partners should comply with applicable competition laws and regulations (also referred to as anti-trust laws). In particular, business partners should refrain from entering into any understanding or agreement that would preclude competition either with their competitors or with their own business partners. This applies to any arrangement that influences prices, terms of sales (including discounts), strategies or customer relations, markets, market shares, customers or territories (particular care is expected regarding the participation of business partners in tender procedures). This also applies to the exchange of sensitive information or to any other conduct that unlawfully restricts or may restrict competition.

### *Maintaining Accurate Records*

Keeping accurate records and reporting allows Chief Enterprises to ensure that legal and regulatory mandates are met. Thorough recordkeeping is key to our overall integrity which reflects positively on our reputation and credibility. In every level of our company, we each uphold the responsibility of maintaining the accuracy of all company operations and financial information by properly classifying transactions and managing records properly. Chief Enterprises expects that its business partners maintain accurate records and report in the course of business with Chief Enterprises in kind.

### *Data Protection*

Business partners are expected to comply with applicable data protection laws and regulations (also referred to as privacy laws) when processing personal data in relation to their business with Chief Enterprises. Personal Data is defined as any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as: a name, an identification number, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. In addition, business partners conducting a processing activity on behalf of Chief Enterprises are expected to comply with the agreed upon specific contractual provisions. In particular, business partners have a responsibility to protect personal data from improper disclosure, theft, or misuse at all times and must

immediately report to Chief Enterprises any incident that involves Chief Enterprises personal data.

Business partners should handle Chief Enterprises' confidential information comporting with the confidentiality provisions set forth in place, in particular:

- protecting Chief Enterprises' confidential information from theft or misuse, improper disclosure, or any and all inappropriate use by taking adequate precautions and measures to safeguard such confidential information.
- to only disclose Chief Enterprises' confidential information to their directors, officers, and employees with legitimate cause.
- to not share confidential with a competitor of Chief Enterprises, unless given prior consent by Chief Enterprises.
- at the severance of the business relationship, confidential information will be handled in accordance with the confidentiality provisions in place with the knowledge that confidentiality must be maintained after the business relationship has ended.

#### *Import and Export Controls*

Business partners are expected to strictly comply with all applicable laws for the import and export of goods, services and information. Furthermore, business partners must comply with all sanctions list.

#### *Whistleblower Process*

Violation of the Code of Conduct for Business Partners must be identified and remedied immediately to protect Chief Enterprises, its employees, and business partners. This warrants vigilance on the part of everyone in conjunction with a willingness to draw attention to possible regulatory violations on the articulable basis of reasonable suspicion. Chief Enterprises values information of this nature when the acts in question pertain to Chief or to Chief's business or reputation.

If there is reasonable suspicion of potential misconduct on the part of Chief Enterprises business partners or its employees, please report this by email [compliance@chiefent.com](mailto:compliance@chiefent.com).

### *Remedial Actions*

Any and all violations of this Code of Conduct for Business Partners should immediately come to a halt, particularly environmental and human rights code violations. Business partners should immediately prepare (or have a plan in place) to mitigate such damages. The plan to mitigate the damages should also accompany a reasonable time schedule. All actions taken should be documented and subject to review. If a suspected violation occurs, business partners should immediately investigate the suspected violation(s) and also immediately notify Chief Enterprises of the investigation and the mitigating measures taken to rectify the matter.

### **Violation of Code**

Chief Enterprises believes the expectations for adherence to this Code of Conduct are fair and reasonable, and will not place undue burden on any of our business partners. If Chief becomes aware of a breach in conduct or lack of action towards the expectations defined in this document, we reserve the right to take further action.