



# **Georgetown Metal Processing (GMP)**

## **SUPPLIER CODE OF CONDUCT AND SOCIAL RESPONSIBILITY (SCCSR)**

## **GMP SUPPLIER CODE OF CONDUCT AND SOCIAL RESPONSIBILITY FOR BUSINESS STAKEHOLDERS**

### **INTRODUCTION**

Georgetown Metal Processing (GMP), Supplier Code of Conduct and Social Responsibility (SCCSR) sets forth labor standards and working condition requirements for GMP's suppliers for the purchase and sale of materials and products. The principles embodied in this SCCSR are designed to be consistent with the core conventions of the International Labour Organization (ILO), the specialized agency of the United Nations focused on global labor standards.

At GMP, we are committed to:

- a standard of excellence and service in every aspect of our business, locally and globally;
- ethical and responsible conduct in all of our operations;
- respect for the rights of all individuals; and
- respect for the environment.

As a matter of Policy, GMP expects these same commitments to be shared by all GMP's Business Stakeholders and suppliers of materials, products, and services to GMP. Compliance with GMP's SCCSR is a requirement for doing business with GMP. It applies to all GMP businesses and all of our Business Stakeholders and their employees. GMP's Business Stakeholders include (but are not limited to):

- Agents and Intermediaries;
- Distributors;
- Licensors and Licensees;
- Parties that provide services to, for, or on behalf of GMP ;
- Producers, Manufacturers, Growers, Refiners, Metals and Mining Companies;
- Equipment Suppliers; and all other
- Vendors.

At a minimum, we require that GMP and all of GMP's Business Stakeholders and customer(s) meet the following standards:

#### **I. SUPPLIER CODE OF CONDUCT AND SOCIAL RESPONSIBILITY**

GMP is committed to conducting business in an ethical and responsible manner. We respect and support international principles aimed at protecting and promoting human rights, as described in the United Nations' Universal Declaration on Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. In our own operations, GMP seeks to operate in compliance with all applicable laws wherever we do business.

While governments have the primary responsibility for protecting and upholding the human rights of their citizens (as well as others within their jurisdiction), GMP recognizes its responsibility to respect human rights in its operations and supply chains. In addition, we recognize that we have an opportunity to promote human rights where we can make a positive contribution. This includes, among other things, opposing forced labor, human trafficking, and the exploitation of children and other vulnerable populations.

#### A. COMPANY WORKPLACE POLICIES

We strive to foster safe, inclusive and respectful workplaces wherever we do business. GMP's workplace policies and practices include commitments to non-discrimination and freedom from harassment, and require that the company refrains from knowingly entering into relationships that, directly or indirectly, expose team members and employees to undue health and safety risks, or that use child, prison or forced labor, or other similarly exploitative practices. These policies and practices are in accordance with the Creeds set forth in GMP's Code of Conduct and Ethics ("COCE"). GMP provides its COCE to all GMP employees and periodically provides training to employees on topics covered in the COCE, which are detailed in GMP's Employee Handbook and complemented by this SCCSR.

#### B. HUMAN RIGHTS WITHIN OUR SPHERE OF INFLUENCE

We also strive to foster safe, inclusive and respectful workplaces wherever our products are sourced. We expect the same commitment from our Business Stakeholders, both in the United States and abroad. GMP's SCCSR sets forth requirements for suppliers of our products with respect to labor standards and working conditions. The principles embodied in our SCCSR are designed to be consistent with the ILO Declaration on Fundamental Principles and Rights at Work. We implement this commitment through dedicated compliance tools that communicate expectations to all parties within our supply chain.

### II. RESPECTING PEOPLE'S RIGHTS

GMP is committed to conducting its business in accordance with the highest standard of business ethics and respect for human rights, our environment, and in compliance with all applicable laws.

While we recognize that different legal systems exist in the countries in which materials and finished goods may be manufactured or sourced, our SCCSR sets forth certain basic minimum requirements that all Business Stakeholders, whether owned and operated by GMP or by third parties, must satisfy. Those basic minimum requirements are consistent with the ILO requirements, and include the following:

- No use of prison/forced labor;
- No human trafficking;
- No use of child labor;
- No deception as to the nature and type of work;
- No excessive overtime;
- No worker or employee recruitment fees or debt bondage;
- No withholding or delay of wages;
- No withholding or confiscation of employee documents (e.g., passports, national identity documents);
- No use of corporal punishment, sexual harassment, or other forms of coercion or threats;
- No worker or employee isolation, restriction of movement, or communications;
- No abusive working conditions;
- Compliance with Federal, State and local laws and regulations; and
- Providing workers with a safe and healthy workplace, and housing if applicable.

These principles are discussed in more detail below.

We abhor forced labor and child labor. We do not employ children under the legal age to work in the jurisdiction governing employment and in no event under the age of 15, even if the applicable law or regulation permits children under the age of 15 to work. More generally, unless a higher minimum working age is required by applicable law or regulation, we comply with ILO Convention 138 especially as it relates to the employment of children between 15 and 18 years of age, and we expect our suppliers and partners to subscribe to the same obligations and strictly comply with the related legislation.

Similarly, we require employment practices to be free from forced labor and workers to be paid according to applicable wage laws, including minimum wage, overtime and mandated benefits and to be treated equally and fairly.

### Child Labor

GMP will not employ children under the legal minimum age to work in the location of employment, and in no event under the age of 15 years, nor use forced or compulsory labor. Likewise, no GMP Business Stakeholder may employ children under the legal minimum age to work in the location of employment and in no event under the age of 15 years, nor use forced or compulsory labor. Working hours, rest time, and periodic leave must also be respected, in line with local legislation or collective bargaining agreements, where applicable.

The term “child” refers to a person younger than 15 or, if higher, a person younger than the local legal minimum age for employment or the age for completing compulsory education.

Business Stakeholders employing young persons who do not fall within the definition of “children” must also comply with any laws and regulations applicable to such persons.

Vocational training programs and apprenticeships are only allowed within the scope permitted by the applicable laws and regulations of the relevant jurisdiction, and then only to the extent consistent with the conventions of the ILO.

### Involuntary Labor

Business Stakeholders shall not use any form of forced, bonded, indentured, or prison labor. All work – including overtime work – must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.

GMP’s Business Stakeholders shall ensure that third-party labor agencies providing workers are compliant with the provisions of this SCCSR and the sending country and receiving country laws, whichever is more stringent in its protection of workers.

Business Stakeholders shall ensure that any contracts for both direct and contract workers clearly convey the conditions of employment in a language understood by the worker.

Business Stakeholders shall be responsible for payment of all recruitment fees and expenses and shall not transfer any such charges to their workers. Such fees and expenses include, but are not limited to expenses associated with recruitment, processing or placement of both direct and contract workers.

### Conflict Free Minerals

Business Stakeholders shall not use conflict minerals as defined by the Wall Street Reform and Consumer Protection Act and implementing regulations (“CMS”) in their provision of goods to GMP. Business Stakeholders shall include appropriate language in their supply contracts prohibiting the use of CMS and shall supply documentation demonstrating that their goods are compliant, upon request by GMP.

### Health and Safety

Business Stakeholders are required to provide employees with a safe and healthy workplace. Business Stakeholders shall develop and implement health and safety management practices in all aspects of their business. Without limitation, Business Stakeholders must:

- Comply and implement a process to ensure that their operations comply with all applicable occupational health and safety laws and regulations, including but not limited to requirements that address occupational safety, emergency preparedness,

occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, and sanitation.

- Independent of any applicable law or regulation, ensure, at a minimum: reasonable access to potable water and sanitary facilities; safe use of materials and equipment; fire safety; and adequate lighting, heat and ventilation.
- Take action to minimize the causes of hazards inherent in the working environment, and implement controls to protect sensitive populations.
- Ensure that the same standards of health and safety are applied to any food or housing that they provide for employees.
- Establish an occupational health and safety management system that, at a minimum, demonstrates that health and safety management is integral to the business, allows for leadership and encourages employee participation to set policy, roles, responsibilities, and accountabilities, provides for risk and hazard identification and assessment, and provides appropriate communication channels for employee access to health and safety information. This management system must include procedures to address incident recordkeeping, investigation, and corrective action.
- Prohibit the use, possession, distribution, or sale of illegal drugs on their business premises.

### Respect for Human Rights

As a member of the Toyota Tsusho Group, GMP is subject to the Toyota Tsusho Group Human Rights Policy (“TTGHRP”), available ([CLICK HERE](#)). It is GMP’s expectation that Business Stakeholders will undertake appropriate measures to meet the goals contained in this Code, which is based upon the TTGHRP, in their provision of goods and services to GMP, and in their operations.

In keeping with the core values of the Toyota Tsusho Group, GMP considers Business Stakeholder compliance with the principles of this SCCSR and the TTGHRP to be an inherent part of the quality responsibility of the Business Stakeholder for the goods and/or services it provides to GMP.

### Coercion and Harassment

Business Stakeholders will treat each employee with dignity and respect, and will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological, or verbal harassment or abuse.

### Nondiscrimination

Business Stakeholders will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination, or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion or disability.

As a global company, we value and encourage diversity. The employees of all GMP Business Stakeholders must work in a workplace free from discrimination,

harassment or abuse. No human rights violations will be tolerated, including physical abuse, sexual harassment, verbal harassment or psychological harassment. Any sexual or psychological harassment, bullying or other such conduct that interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment, is totally forbidden at GMP, even if there is no relation of job subordination between the parties.

Business Stakeholders shall not require a pregnancy test or discriminate against pregnant workers except where required by applicable laws or regulations or prudent for workplace safety. Business Stakeholders must ensure that their employment practices are free from any kind of discrimination. They must also recognize the principle of equal remuneration for men and women, as per ILO Convention No. 100.

### Association

GMP 's Business Stakeholders will respect the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference. We believe in freedom of association. We expect our Business Stakeholders to comply with all applicable legislation in that respect, to encourage dialog between employees and management and to respect collective bargaining agreements, if any. Business Stakeholders are expected to combat any kind of discrimination; harassment or retaliation vis-à-vis employee representatives or unionists.

### Compensation

We expect Business Stakeholders to recognize that wages are essential to meeting employees' basic needs. Business Stakeholders will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits.

Except in extraordinary business circumstances, Business Stakeholders will not require employees to work more than the lesser of: (a) 48 hours per week and 12 hours overtime; (b) the limits on regular and overtime hours allowed by local law; or (c) where local law does not limit the hours of work, the regular work week plus 12 hours overtime. In addition, except in extraordinary business circumstances, employees will be entitled to at least one day off in every seven-day period.

Business Stakeholders will compensate employees for overtime hours at such a premium rate as is legally required or, if there is no legally or contractually prescribed premium rate, at a rate at least equal to the regular hourly compensation rate.

Business Stakeholders shall not use deductions from wages as a disciplinary measure. Workers must be paid in a timely manner, and the basis on which workers are being paid must be clearly conveyed to them in a timely manner.

We require that, at any time throughout the course of doing business, the supplier will agree to cooperate with audits (whether announced or unannounced, and whether by GMP, any agent with which it contracts, or any customer with which GMP does business) in order to verify compliance with our requirements.

## Environmental Protection and Compliance

Maintaining a healthy and sustainable environment is another facet of respect for individual and community rights that this SCCSR seeks to promote. GMP requires that its Business Stakeholders comply with applicable environmental laws and regulations.

As a member of the Toyota Tsusho Group, GMP is subject to the Toyota Tsusho Group Environmental Policy and has implemented its own GMP's Environmental Sustainability Commitment, ([CLICK HERE](#)). It is GMP's expectation that Business Stakeholders will strive to meet the goals established in the Environmental Commitment in their provision of goods and services to GMP, and in their operations generally.

GMP recognizes its social responsibility to protect the environment. We expect Business Stakeholders to share our commitment by responding to challenges posed by climate change and by working toward protecting the environment. As a part of this commitment, all GMP Business Stakeholders must, without limitation:

- Comply with all applicable environmental laws and regulations, including but not limited to laws and regulations that regulate hazardous materials, air, and water emissions, and wastes as well as laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in manufacturing or product design.
- Conform to all GMP requirements regarding product and packaging labeling, material content, and recycling, and disposal as directed by GMP in their business contracts.
- Obtain and maintain all required environmental permits, regulatory approvals, and registrations.
- Prevent or eliminate waste of all types, including water discharges and energy losses, by implementing appropriate conservation measures in Business Stakeholder facilities through: (1) the use of conservation-minded maintenance and production processes; and (2) by implementing strategies to reduce, reuse, and recycle materials (in that order), whenever possible, prior to disposal.
- Identify any chemicals, waste, or other materials that may be released, and which may pose a threat to the environment, and manage such chemicals or materials appropriately to ensure their safe handling, movement, storage, use, reuse, recycling, and disposal. Ozone-Depleting Substances (ODSs) are to be effectively managed in accordance with the Montreal Protocol and applicable regulations.



- Disclose complete, consistent, and accurate scope 1, 2 and 3 greenhouse gas (GHG) emissions data and/or components required to calculate GHG emissions data, via [IFRS/ISSB](#) or an alternative method that GMP will provide. If requested by GMP, business Stakeholders must provide plans to reduce greenhouse gas (GHG) emissions in alignment with GMP's requirements. The timing of Business Stakeholder conformance to this requirement may be determined by GMP standards and requirements that are set forth in the contract with GMP.

### Support of Local Communities

Forced labor can have an adverse impact on the continuity and survival of local communities. GMP has committed to protecting the rights and lifestyles of local communities in the regions where it does business and requires its Business Stakeholders to protect the rights and lifestyles of local communities in their labor and employment practices.

### Other Laws

Business Stakeholders will comply with all other applicable laws and regulations, including those pertaining to the manufacture, pricing, sale, and distribution of merchandise. All references to "applicable laws and regulations" in this SCCSR include local and national codes, laws, rules and regulations, as well as applicable treaties and voluntary industry standards.

### Subcontracting

Business Stakeholders have the primary responsibility to ensure that subcontractors who manufacture materials, components or products that will be sold to GMP, or incorporated in goods sold to GMP, comply with this SCCSR.

### Monitoring and Compliance

Business Stakeholders will authorize GMP and its designated agents (including third parties) to engage in monitoring activities to confirm compliance with this SCCSR, including: unannounced on-site inspections of manufacturing and supplier facilities and employer-provided housing; reviews of books and records relating to employment matters; and private interviews with employees. Business Stakeholders will maintain on site all documentation that may be needed to demonstrate compliance with this SCCSR. Business Stakeholders shall disclose information related to their labor and employment practices in a timely and appropriate matter.

### Publication

Business Stakeholders will take appropriate steps to ensure that the provisions of this SCCSR are communicated to employees, including the prominent posting of a copy of this SCCSR, in the local language and in a place readily accessible to employees, at all times.

### Anti-Trust

Business Stakeholders shall conduct business in full compliance with the antitrust and fair competition laws that govern the jurisdictions in which they conduct business.

### Anti-Corruption and Anti-Money Laundering

Business Stakeholders shall conduct business in full compliance with the anti-corruption and anti-money laundering laws and regulations that govern the jurisdictions in which Business Stakeholders conduct business and/or provide goods and services to GMP. Business Stakeholders shall undertake appropriate measures to ensure that payments are not being used to support illegal activity, including terrorism.

### Boycotts

Business Stakeholders shall not participate in international boycotts which are not sanctioned by the United States (U.S.) Government. Business Stakeholders shall notify GMP in writing in the event that they believe that a law or regulation of an applicable jurisdiction requires such participation so that the parties may confer on the appropriate action to be taken.

### Quality:

We appreciate business stakeholders understanding that quality and safety is an absolute prerequisite for our business, and we expect that all Toyota Tsusho Group company suppliers will devote themselves to quality and safety in products and services provided.

## III. CONSEQUENCES OF FORCED LABOR CODE (SCCSR) VIOLATIONS

There may be serious consequences for violating this SCCSR and any applicable laws, including, but not limited to, the potential termination of contracts.

## IV. ANTI-FORCED LABOR SUPPLIER DUE DILIGENCE

### A. BACKGROUND

In 2022, GMP rolled out tools to support our business units in vetting suppliers and the countries in which materials and products sourced or purchased by GMP are manufactured, grown, mined, and/or smelted. We made these changes to 1) effectively focus our resources; 2) better manage our supply chain for both our customer-directed and independently sourced products; and 3) identify the producers of those products and their constituent materials.

## B. HEIGHTENED SUPPLIER DUE DILIGENCE

GMP conducts heightened due diligence on suppliers who source products or product inputs which are at higher risk of being made in whole or in part with forced labor. We assess forced labor risk based on the following factors:

- **Location of the Supplier and its Sub-Tier Suppliers:** Certain countries and regions are at higher risk of the presence of forced labor in manufacturing supply chains. Suppliers located in these locations – or which source products or product inputs from sub-tier suppliers located in these locations – may be required to undergo heightened anti-forced labor due diligence.

To help guide suppliers, GMP has developed a list of **Higher-Risk Sourcing Countries** which identifies countries that may, depending on the product supplied and other factors, present higher risk of using forced labor in manufacturing supply chains. The current list of Higher-Risk Sourcing Countries is set forth below as **Annex A**. The information in this Annex is based on reputable NGO and other sources detailing forced labor risks, including the [\*Global Slavery Index\*](#) published by the ILO and the International Organization for Migration (IOM).

Suppliers or sub-suppliers which are located in a Higher-Risk Sourcing Country may be subjected to heightened due diligence procedures. Please note that supplier location in one of the listed countries does not automatically subject the supplier to heightened due diligence; similarly, suppliers located in other countries not included on this list may nonetheless be subjected to heightened due diligence based on the product supplied and other factors. GMP may periodically update the list of Higher-Risk Sourcing Countries as new information becomes available.

- **Type of Product:** Certain products and product inputs are at higher risk of being made with forced labor, and suppliers of these products may be required to submit to heightened anti-forced labor due diligence. These **Higher-Risk Products** may be subjected to enhanced due diligence procedures. A list of Higher-Risk Products is set forth as **Annex B**. This list is updated on an annual basis, unless any significant action occurs that requires a supplemental update.
- **Allegations or Evidence of Forced Labor:** Suppliers may be required to undergo heightened due diligence if GMP learns of credible allegations or acquires evidence of forced labor at the suppliers' facilities or in their supply chains.

Our Business Stakeholders are required to notify us if they become aware of any credible allegation or evidence that forced labor is present anywhere throughout the supply chain of the products (or inputs for products) supplied to GMP. This responsibility extends to due diligence with regard to their subcontractors and sub-suppliers.

Relying on the above-listed factors to inform our due diligence and risk-based sourcing determinations helps us to effectively focus our resources in order to better manage the supply chain for GMP and our customer directed suppliers.

### C. ADDITIONAL GUIDANCE TO SUPPLIERS – RESPONSIBLE SOURCING

As part of our ongoing support of the International Labor Organization's (ILO) and International Finance Corporation's (IFC) [Better Work](#) program, facilities that participate in a Better Work country program (in countries that are included on the list of Higher-Risk Sourcing Countries) and also meet the labor standards set forth in this Code may be used to source products. Better Work is a program that provides assessment and capacity-building services for factories in select countries. The ILO and IFC make autonomous decisions on where Better Work operates using an independent set of criteria that include consultations with national stakeholders of government, employers and workers.

In addition, below are several publicly available resources that may help to provide you with more information on forced labor and responsible sourcing.

- International Labour Organization, [Global Business Network on Forced Labour](#)
- International Labour Organization, [Indicators of Forced Labour](#)
- International Labour Organization, [International Labor Standards](#)
- Responsible Business Alliance, [Responsible Labor Initiative](#)

As noted above, compliance with these requirements is not an option. Any questions regarding either GMP 's Supplier Code of Conduct and Social Responsibility or the Permitted Sourcing Countries List should be promptly directed to the GMP Legal Department or the assigned GMP business representative.

### D. SUPPLY CHAIN MAPPING INFORMATION AND TRACEABILITY DOCUMENTATION

Heightened due diligence discussed under sub-Section (B) above may include a requirement for the supplier to: (1) **map the supply chain** of the products supplied to GMP (i.e., identify the material suppliers throughout the supply chain); and (2) **provide traceability documentation** (i.e., tracing the supply chain from raw materials to the imported good, including purchase orders, commercial invoices, payment records, shipping records, and import/export records).

If a GMP supplier or its sub-tier supplier is selected for heightened due diligence, the GMP supplier shall be required to provide the documentation listed above to GMP in a timely manner.

GMP may request additional supply chain information and tracing documentation, when necessary to verify compliance with this Code. The supplier shall fully cooperate with any such request and use its best efforts to collect, in a timely manner, supply chain information and traceability documentation from additional entities in the supply chain for the specified product.

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**ANNEX A**

**HIGHER-RISK SOURCING COUNTRIES\***

**This information is subject to change. Please read the latest version of Annex A**

- Argentina
- Brazil
- China
- Cote D'Ivoire
- Ghana
- India
- Indonesia\*\*
- Japan\*\*
- Malaysia
- Peru
- Russia\*
- South Korea\*\*
- Taiwan\*\*
- Thailand
- Vietnam

\*The information in this Annex is based on reputable NGO and other sources detailing forced labor risks, including the [Global Slavery Index](#) published by the ILO and the International Organization for Migration (IOM). Please note that a supplier location in one of the listed countries shall not automatically subject the supplier to heightened due diligence; similarly, suppliers located in other countries not included on this list may nonetheless be subjected to heightened due diligence based on the product supplied and other factors.

\*\*Denotes countries identified as higher-risk for fish or fish products only.

**GEORGETOWN METAL PROCESSING (GMP)  
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**ANNEX B**

**HIGHER-RISK PRODUCTS**

**This information is subject to change. Please read the latest version of Annex B**

Suppliers of the following products **or any products containing any of the following products** may be required to undergo heightened due diligence:

- Aluminum
- Cobalt
- Cocoa
- Cotton
- Electronics
- Fish
- Garments/Apparel
- Lithium or Lithium-ion batteries
- Palm oil
- Silica-based products, including polysilicon
- Timber