

Supplier Code of Conduct

Based on the Responsible Sourcing Toolkit 2020 of



1 COMMITMENT

American Buffalo Metals (ABM) and its subsidiaries recognizes that our supply chain activities can have wide ranging social and environmental impacts and that our responsibility extends beyond our own operations, into our supply chain.

We are committed to socially and environmentally responsible procurement and have set high standards for the way we do business so our customers and other partners know we can be trusted.

Our business mindset requires that we work only with Suppliers who have the ability to consistently meet our standards and specifications and are committed to values of conduct that are compatible with our own.

This commitment is reflected in our Supplier Code of Conduct (“Code”), that sets out the minimum standards of behavior we require of our Suppliers.

We ask our Suppliers to not just comply with the Code, but to use reasonable endeavors to exceed it and promote continual improvement throughout their business operations.

The United Nations Sustainable Development Goals (SDGs) invite action from the private sector to address some of the world’s most pressing development issues. Situated in a broader ethical sourcing framework, our Supplier Code of Conduct is one way ABM aligns with the SDGs

2 APPLICATION AND ACCEPTANCE

The Code is applicable to all contract Suppliers and business partners, who are expected to cascade these requirements to their own supply chain.

Sustainability and compliance with this Supplier Code of Conduct are part of the criteria ABM uses during Supplier selection, and this Code is applicable to all our Suppliers and their affiliates. Suppliers must diligently provide official answers, documents, and certificates related to sustainability as soon as it is requested by ABM.

Adhering to and signing this Code of Conduct is therefore a requisite to do business with ABM.

3 ASSESSMENT

By adhering to this Supplier Code of Conduct, each Supplier agrees to be assessed or audited by ABM or by a third party mandated by ABM.

In case of violation of this Code of Conduct, ABM will determine corrective actions with the violating Supplier, which can include termination of our business relationship.

4 QUESTIONS

Suppliers may raise any concern or questions by sending an email at the following email address: Kelly@americanbuffalometals.com or via phone: 256-281-1914.

We will provide guidance when requested.

5 GOVERNANCE & ETHICS

ABM conducts its business in accordance with the highest standards of ethical behavior and in accordance with all applicable laws and regulations and expect its business partners to do the same.

1. Compliance
 - Suppliers must comply with all applicable local laws and regulations, including [example: the U.S. Foreign Corrupt Practices Act and the UK Bribery Act] in all the countries in which they operate.
2. Management System, transparency and disclosure of information
 - In order to be able to prevent or report any issues on application of laws or of this Code of conduct, Suppliers should have a formal system when feasible to establish rules and indicators, keep records and trigger corrective actions, endorsed by senior management of the Supplier.
 - Suppliers shall at any moment and upon request of ABM or other appropriate parties be able to disclose information and performance indicators on business activities, Labor, health and Safety and environmental practices.
3. Business integrity, anti-corruption and anti-Bribery policy
 - Supplier shall not be involved directly or indirectly in any scheme of bribery, kickbacks, extortion, corruption or similar prohibited business practices.
 - Suppliers shall have written, or implicit policies prohibiting these practices and shall train employees and subcontractors accordingly.
 - In particular, these policies shall include possibilities for workers to report misconduct without fear of retaliation.
 - Suppliers should keep records and be able to provide evidence of compliance with this section.
4. No improper advantage
 - Suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage.
 - Any business courtesy (meals, company gifts and entertainment) must be of reasonable value and frequency according to local business practices.
5. Conflict of interest
 - Suppliers shall avoid any situation where a Supplier 's employee has privileged information or relationship (e.g.: family relations) with an ABM employee who can influence or make decisions favoring the Supplier's business. Such situations must be disclosed by the Supplier. Conflicts of interest must be disclosed and approved by management.
6. Fair business and competition
 - Supplier does not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of fair competition laws or antitrust laws that govern the jurisdictions in which it conducts business.
7. Intellectual property and confidential information
 - Supplier respects the intellectual property rights of others.
 - Supplier takes appropriate steps to safeguard and maintain American Buffalo Metal's confidential and proprietary information such as pricing or contract details.

8. Data Protection
 - Suppliers shall ensure it complies with the relevant national data protection laws and particularly the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), where applicable.
9. Responsible Sourcing and Conflict Minerals
 - Suppliers shall exercise due diligence on the source of materials and make their due diligence measures available to ABM on request, to make sure there is no conflict with applicable laws or this Code.
 - Suppliers that are sourcing raw materials such as the tantalum, tin, tungsten and gold (known as “conflict minerals”) shall ensure that this trade does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses.
 - Suppliers must ensure that materials are not sourced from conflict-affected or high-risk areas and must maintain full traceability to demonstrate responsible sourcing in alignment with the ASI Performance Standard. ABM reserves the right to evaluate suppliers who may be at risk of sourcing from such regions and to conduct audits to verify that these risks are not present within the supply chain.

6 LABOUR AND HUMAN RIGHTS, HEALTH & SAFETY

ABM is committed to upholding human and labor rights of workers, and to treat them with dignity and respect as understood by the international community, in the proper conditions of health and safety. We require our Suppliers to also commit to these values.

1. Prevention of Child Labor & Young Workers
 - Child labor should not be used at any level of the supply chain in accordance with the Convention of the International Labor Organization.
 - Young Workers, those under 16 years of age, shall not perform work that is likely to jeopardize their health or safety nor interfere with their education.
2. Humane Treatment and anti-harassment
 - There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.
3. Anti-discrimination
 - Suppliers shall not discriminate against any worker based on their age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership.
 - This applies for recruitment, salary, promotion, or termination matters.
4. Voluntary Employment
 - Forced, bonded (including debt bondage) or indentured labor or involuntary prison labor shall not be used by Suppliers.
 - Suppliers shall not be complicit to any form of slavery or human trafficking.
5. Working Hours, wages and benefits
 - Suppliers shall follow all applicable laws with respect to working hours, wages, and benefits.
 - Workers shall not be required to work more than 60 hours per 7-day week, including overtime, and shall be allowed at least one day off every seven days.
 - Overtime shall be compensated at the prevailing overtime rates or by time off in lieu.

6. Freedom of Association and Collective Bargaining
 - Suppliers are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.
7. Health & Safety
 - Suppliers shall ensure a safe and healthy work environment, by evaluating and managing occupational health and safety hazards.
 - Suppliers should establish Occupational Health & Safety leadership and management system, including emergency plans, response procedures and corrective actions.
 - Suppliers shall provide workers with appropriate personal protective equipment training on their use.
 - Suppliers shall comply with the European REACH regulation or the corresponding hazardous materials legislation of the USA.

7 ENVIRONMENT

ABM is committed to environmental protection and to conduct business in an environmentally sensitive manner and wants its Suppliers to do the same

1. Management system
 - Suppliers should have systems in place to ensure safe management of waste, air emissions and wastewater discharges, eventually integrated with the Health and Safety management system.
2. Environmental Permits and Reporting
 - All required environmental permits and registrations are to be obtained, maintained and kept current, and their operation and reporting requirements are to be followed.
3. Resource Reduction
 - Suppliers are committed to ensuring the efficient use of resources and ensure that waste of all types is reduced or eliminated at the source or by practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
4. Greenhouse Gas Emissions and Energy Consumption
 - Suppliers should look for cost effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.
5. Waste Management
 - Suppliers shall identify all potential waste streams and ensure processes are in place to manage these in line with the waste hierarchy and all applicable regulations.
6. Wastewater generated from operations
 - Industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.
7. Hazardous Materials Chemicals and other materials posing a hazard

- Suppliers are to actively avoid causing environmental damage and/or negative environmental impact through their operations.
- If released to the environment, these products are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- Suppliers shall regularly review the use of hazardous substances and substitute them with less hazardous alternatives that are reasonably practicable.
- Supplier must ensure that materials intended for ABM are not exposed to radioactive substances. In addition, suppliers are required to establish and maintain contingency plans to address any incidents involving potential or actual radioactive exposure.

8. Product Content Restrictions

- Suppliers shall adhere to all applicable US & Alabama state laws and regulations and customer requirements regarding prohibition or restriction of specific substances including labelling for recycling and disposal.

The undersigned acknowledges their understanding of, and their compliance with, all applicable laws and the above ABM.

Suppliers are expected to take necessary corrective actions to promptly remediate any noncompliance.

ABM reserves the right to terminate its business relationship with any Supplier who is unwilling to comply with this Code. Statement of Responsibility

----- (name of company), a company legally constituted in
 ----- (name of country)

hereby declares that it:

(a) understands and accepts the content of the Code, included with this Statement of Responsibility.

(b) will share, with ABM and its own network of Suppliers, those efforts, difficulties and achievements in implementing this Code.

(place), DD/MM/YYYY

 (Name and position, Signature, and/or official stamp of company)