

Title:	Eccomelt Code of Conduct Policy		
Department:	HR / Corporate	Document No:	ECC-POL-COR-001 Rev 1

Policy

The purpose of the Code of Conduct policy of The House of Metals is to ensure that all employees are aware of the standards expected of them. The way in which employees conduct themselves both on and off-duty can also have a significant impact on the Company, its business, reputation, customer relationships, and workplace environment.

Procedure

Employees are expected to always conduct themselves in a professional and ethical manner at all times to ensure the reputation of the House of Metals remains secure and untarnished.

Employees must report any suspected or confirmed misconduct to their supervisor and may do so without fear of retaliation or discipline. All reports of unacceptable conduct or behaviour will be kept in the strictest of confidence.

All employees are expected to know, understand, and adhere to Company guidelines and policies to protect the best interests of the Company and its employee base. We expect you to respect the rights and feelings of others and demonstrate personal integrity and professionalism.

Please refrain from doing anything that would be considered improper conduct. “Improper conduct,” is defined as conduct that involves illegal, fraudulent, dishonest, or unethical behaviour, or serious negligence in the performance of your duties. Following are some examples of activities viewed as improper conduct:

- Theft
- Abuse of Company property or equipment
- Sexually, verbally, physically, or mentally abusing or harassing any person associated with the House of Metals — on or off-premises
- Habitual tardiness or absence
- Solicitation or acceptance of personal gifts or gratuities in exchange for preferential business treatment
- Falsifying Company records
- Disclosing confidential or proprietary Company information to unauthorized persons
- Engaging in activity that is determined to be a serious conflict of interest with the House of Metals

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- Possession, use, sale of, or being under the influence illegal substances on Company premises or while on Company business
 - Insubordination or failure to carry out instructions
 - Job abandonment

Ethical Decision-Making Framework

You should assess the following criteria to determine whether a specific behaviour or activity is appropriate:

- **Common sense** - Generally speaking, the appropriateness of a practice or activity should be guided by common sense and sound business judgment.
- **Public scrutiny** - Take the public scrutiny test: If you wouldn't want to read about your action on the front page of your local newspaper, don't do it.
- **Company Policy** - Does the action comply with the Company's policies?
- **When in doubt, ask!** Your manager, supervisor and Human Resources are available to help you do the right thing.

All allegations of unacceptable conduct or behaviour will be investigated. Violation of this policy may result in disciplinary action up to and including termination in accordance with established policy, depending on the severity of the infraction.

Approved by:

Zulf Karim
Chief Operating Officer

Date: May 1, 2024