

Title:	Eccomelt Bribery, Fraud and Corruption Response Plan		
Department:	HR / Corporate	Document No:	ECC-POL-COR-003 Rev 2

Policy

House of Metals Company Ltd. and its subsidiaries (together “**Eccomelt**” or the “**Company**”) carries on business in Canada and internationally. The Company is committed to conducting business in accordance with all applicable laws, rules, and regulations, including those relating to bribery and corruption in the jurisdictions where Eccomelt conducts business. It is our policy as an employer to ensure that at every level of management, our business is conducted to the highest ethical standards and in such a way as to comply with all legal requirements that govern our activities.

Eccomelt has adopted this policy to ensure the ongoing success of our organization, and to protect the best interests of all our employees, vendors, customers, and the Company from any illegal or damaging actions committed by individuals either knowingly or unknowingly.

This policy is to ensure that our staff refrain from and are prepared to identify bribery, fraudulent activity, and corruption and to report these activities appropriately. These procedures are intended to supplement the Global Code of Conduct Policy and to provide general guidance with respect to the prevention, investigation and remediation of bribery, fraud, and corruption. We hold ourselves accountable for monitoring changes to applicable law within all jurisdictions of operation and will effectively communicate the implications of the changes to all staff and stakeholders as applicable.

Eccomelt will not tolerate any wrongdoing or impropriety with its employees and will immediately take the appropriate disciplinary actions to correct the problem.

Responsibilities

Management & Executives

- In all business dealings, Company officials are required to set a prime example showing honesty and integrity.
- Shall have an open-door policy allowing for the free discussion of suggestions and concerns from employees.
- Must report any conflicts of interest regarding their position at Eccomelt.
- Must report suspected violations.

Employees

- All employees are expected to work together to promote a workplace built on trust, accountability, and openness.
- Disclose any conflicts of interests.
- Report suspected violations.

*Retaliation against employees who use these reporting mechanisms to raise genuine concerns will not be tolerated.

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Guidelines

Unethical Behaviour

- Eccomelt will not be party to the intent or appearance of unethical or compromising practices in its business relationships by means of bribery, fraud, or corruption.
- Harassment or discrimination will not be tolerated.
- Improper use of company trade secrets (as outlined in the Confidentiality agreement) will not be tolerated.
- Employees shall not use corporate assets or business relationships for personal use or gain.

Prevention and Detection of Bribery, Fraud and Corruption:

Mechanisms used in the prevention and detection of these prohibited activities include, but are not limited to:

- Process monitoring
- Random auditing
- Supervision and review
- Provision of appropriate training for new and existing staff
- Written policies and procedures
- Segregation of duties
- Reconciliation of accounts; and
- Review of audits and financial records

Potential risk scenarios: "red flags"

The following is a list of possible red flags that may transpire from interactions within our business that pose potentially high risk that may arise during you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to your manager or directly to the Chief Operating Officer ("COO"), or using the procedure set out in the whistleblowing policy:

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- You learn that a third party has a reputation for paying bribes or requiring that bribes are paid to them or has a reputation for having a "special relationship" with foreign government officials.
- Any third party that insists on receiving a commission or fee payment before committing to sign up to a contract with us or carrying out a government function or process for us.
- Any third-party that requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.

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- Any third-party that requests payment is made to a country or geographic location different from where the party resides or conducts business.
- Any third party requests an unexpected additional fee or commission to "facilitate" a service.
- Any third party that demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- Any third party that requests a payment is made to "overlook" potential legal violations.
- Any third party that requests you provide employment or some other advantage to a friend or relative.
- You receive an invoice from a third party that appears to be non-standard or customised.
- Any third party that insists on the use of side letters or refuses to put terms agreed in writing.
- You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- Any third party that requests or requires the use of an agent, intermediary, consultant, distributor, or supplier that is not typically used by or known to us.
- You are offered an unusually generous gift or lavish hospitality by a third party.

Facilitation Payments & Kickbacks

- We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action in all areas of our business in which we operate. Kickbacks are typically payments made in return for a business favour or advantage.
- You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted.
- If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided.
- You should always ask for a receipt which details the reason for the payment.
- If you have any suspicions, concerns, or queries regarding a payment, you should raise these with your Manager, HR or the COO.

Donations

We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the COO.

Reporting & Record-keeping

- We will keep up to date accurate records of any violations or potential violations that are reported and/or become known.

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- Should any violation exist, we will ensure the steps to record the violations are captured appropriately.
- We will ensure the steps in reporting any potential allegation are known to all staff and other applicable stakeholders.
- We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- You must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review.
- You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.
- We will ensure that all staff are provided with appropriate training and keep up to date records to ensure compliance with Eccomelt's Anti-Corruption program/policy.

Your responsibilities

You must ensure that you read, understand, and comply with this policy.

- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify your Manager or the COO as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out below.

Violations

In the event that a violation of this policy occurs, Eccomelt will employ disciplinary measures that reflect the severity of the offence up to and including termination of employment. Some violations may indelibly affect our business in a negative fashion. In this case, punitive measures, including legal action may be pursued.