

## **REAL ALLOY SUPPLIER SUSTAINABILITY POLICY**

Real Alloy Holding, LLC (the “Company”) understands the importance of the Environmental, Social, and Governance impacts of our products and services. We are committed to sourcing responsibly and seek to uphold this throughout the entire supply chain process. Real Alloy’s commitment to this requires us to consider how our suppliers also uphold responsible sourcing standards in their respective industries. We encourage suppliers to comply with the expectations set forth in this REAL ALLOY SUPPLIER SUSTAINABILITY POLICY (this “Policy”) and share these expectations with all employees, partners, and subcontractors involved in the supply of goods and services to Real Alloy.

### **GENERAL LEGAL COMPLIANCE**

All suppliers must comply with the applicable laws and regulations of the region in which they operate. In order to meet the expectations of Real Alloy, suppliers must not engage or be complicit with the following:

- Any form of corruption. Suppliers will not allow any form of money laundering, theft, embezzlement, kickbacks, or fraud;
- Any form of bribery. Suppliers must ensure that anything of value, including but not limited to money, gifts, and unlawful commitments/promises, is not used to obtain or retain business in any capacity. Gaining improper advantages or influencing someone using unlawful incentives is strictly prohibited;
- Anti-competitive behavior. Only fair, competitive processes will be implemented, and suppliers must ensure the adherence to all anti-trust and anti-competition laws; and
- Conflicts of interest. Any situation in which an individual carries biases that may hinder their ability to make rational decisions that directly affect a company.

### **LABOR/HUMAN RIGHTS**

Human and labor rights are essential to Real Alloy. We uphold strong values to ensure the inclusivity and respect of all individuals. Real Alloy requires its suppliers to uphold similar values by complying with, at minimum, the following:

- Prohibition of any form of discrimination and harassment. Suppliers will not engage in adverse action against their employees on any basis. Suppliers must create a welcoming, inclusive workplace for all;
- Prohibition of any form of forced labor, child labor, and human trafficking;
- Prohibition of any form of retaliation in the workplace. It is crucial that employees are comfortable enough to properly raise concerns and grievances. Suppliers should appropriately investigate any reports and implement mechanisms for handling said concerns and grievances;
- Respect for employees’ rights to freedom of association and collective bargaining. Suppliers must comply with all applicable laws supporting an employee’s level of participation in unions, peaceful assemblies, collective bargaining, and all other associations; and
- Respect for legal requirements for hours, benefits, overtime, and wages. Suppliers must provide fair compensation for work executed by their employees and must meet or exceed minimum wage standards. Suppliers will provide employees with descriptive statements for each pay period that accurately represent the work performed and the accompanying fair compensation.

## HEALTH AND SAFETY

Ensuring a clean, safe, and healthy workplace for all employees is crucial to Real Alloy. We strive to see the same from our suppliers, and expect them to meet or exceed all applicable laws, regulations, and recognized standards in their respective industries. Suppliers should work continuously to identify and minimize potential risks in their respective industries. A safe and healthy workplace should comply with, at minimum, the following:

- Creating a respectful, inclusive atmosphere that requires the humane treatment of all employees;
- Providing proper training. All employees should receive proper health and safety training, and will be provided all health and safety related information in a clear and accessible manner;
- Providing proper Personal Protective Equipment (“PPE”). Employees should receive appropriate, well-maintained PPE, and be educated on the proper handling of said PPE;
- Presentation of the associated risks of a job, and what the supplier has done to minimize these risks. Suppliers should work continuously to minimize these risks even further; and
- Implementation of procedures for occupational injury and illness. Suppliers should implement procedures for reporting injury and illness that encourage employees to come forward and ensure proper medical treatment and investigative and corrective measures to prevent the injury or illness from reoccurring. Suppliers should continuously support the afflicted employee through their recovery and, when applicable, facilitate the employee’s return to work.

## THE ENVIRONMENT

Real Alloy strives to protect and preserve the environment by minimizing adverse environmental impacts. We understand the importance of implementing environmental procedures and Real Alloy holds itself to high standards in order to support the aforementioned protection and preservation. Suppliers are expected to hold themselves to a similar standard by addressing, at minimum, the following:

- Pollution and emissions. Suppliers should strive to reduce all pollution including, but not limited to, air, water, land, noise, and light. Suppliers should implement procedures to prevent and constantly minimize any and all forms of pollution. Emissions, such as greenhouse gas emissions, should be monitored and reported in compliance with proper laws and regulations.
  - Greenhouse gas emissions. Suppliers should strive to reduce greenhouse gas emissions and understand the impacts of the Scope 1, 2, and 3 emissions on the environment;
- Waste disposal. Suppliers should implement procedures to minimize the waste product being sent to landfills. Hazardous waste should be disposed of responsibly and follow procedures that meet or exceed the legal requirements.
- Responsible Chemical Management. Any products or materials containing chemicals, and the chemicals themselves, should be handled, stored, and disposed of in such a way to minimize adverse environmental effects and adhere to applicable laws and regulations.
- Environmental permits and reporting. Suppliers should keep all environmental permits, approvals, and registrations up to date. Suppliers should also expect to meet or exceed all legal requirements as it pertains to operations and reporting.
  - Conflict minerals. Suppliers should ensure that material and products supplied to Real Alloy are conflict-free and do not contain conflict minerals. Suppliers should establish policies and management systems with respect to conflict minerals to ensure conflict-free supply chains

- Biodiversity. Suppliers are expected to limit adverse effects on the environment. Suppliers should also take the proper measures to limit deforestation and protect ecosystems and their inhabitants.

## **BUSINESS ETHICS/INTEGRITY**

Real Alloy works to maintain strong ethical standards and uphold the integrity of the Company. Suppliers are expected to hold themselves to a similar level by implementing the following practices:

- Conducting business with maximum transparency by representing products, prices, and services truthfully and accurately;
- Proper disclosing and bookkeeping of finances and documents;
- Respecting IP rights by protecting technological ideas and information. Both customer and supplier information should be safeguarded in the transfer of intellectual property and ideas;
- Respecting data privacy. It is expected that suppliers will protect the personal data of employees, customers, and other business partners. It is important to adhere to all data privacy laws and regulations; and
- Honoring confidentiality. Suppliers are expected to enforce and uphold a policy of confidentiality that protects the rights of its employees and restricts the access and use of confidential information.

## **RESPONSIBLE STEWARDSHIP**

Accountability is a key aspect of Real Alloy's successful operations. We expect all of our suppliers to uphold and enforce the procedures laid forth in this policy. Suppliers have the responsibility of conducting business in a reasonable, safe, ethical manner by complying with the following:

- Proper management. An internal management system should be established that demonstrates a company-wide compliance to this policy;
- Cascading Responsibility. Suppliers are expected to implement a procedure that ensures the distribution of the ideas set forth in this policy throughout the supply chain; and
- Continuous improvement. Suppliers should not be complacent in their industries. They should strive to improve all aspects of their businesses including, but not limited to, those previously stated in this policy. In continually improving, suppliers create safer, stronger, more ethical, and more efficient means of conducting business.

## **REPORTING CONCERNS AND GENERAL INQUIRIES**

For questions or concerns, refer to the Company website:

<https://realalloy.com/>