



# CODE OF BUSINESS

# ETHICS & CONDUCT

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### ***Purpose***

We at Hussey Copper (the “Company”) are acutely aware of the impact a company’s standards of business conduct makes in our relationships with each other and with our customers, suppliers, shareholders, employees, and others. As a result, we must conduct our business in accordance with all applicable laws and regulations and in accordance with the highest standards of business conduct. This Code of Business Ethics and Conduct (the “Code”) helps each of us in this endeavor by providing a statement of the fundamental principles and key policies and procedures that govern the conduct of our business.

Our business depends on the reputation of all of us for integrity and principled business conduct. Thus, in many instances, the policies referenced in this Code go beyond the requirements of the law.

In addition to the Code, the Company maintains targeted policies and procedures to govern the conduct of the Company and all personnel in certain circumstances. Those policies and procedures are available to all personnel upon request from Human Resources or the Compliance Officer.

### ***Hussey Copper Core Values***

To ensure consistent standards throughout the organization, we are first guided by our Hussey Copper Core Values; a compass for each employee when determining key strategy, goals, objectives, and basic approach to our work.

- Safety & Environmental: We approach each task by choice and with commitment.
- Teamwork: We interact with integrity and respect.
- Communication: We focus on communicating to build strong relationships.
- Continuous Improvement: We strive to find new and improved ways to perform our work.
- Purpose Agility: We face each day with a sense of urgency and personal accountability.

### ***Meeting Our Shared Obligations***

Each of us is responsible for knowing and understanding the policies and guidelines contained in the following pages. If you have questions, ask them; if you have ethical concerns, raise them. The Compliance Officer, who is responsible for overseeing and monitoring compliance with this Code, and the other resources set forth in this Code are available to answer your questions and provide guidance, including in the case of suspected misconduct. Our conduct should

reflect the Company's values, demonstrate ethical leadership, and promote a work environment that upholds the Company's reputation for integrity.

## ***Respecting One Another***

The way we treat each other, and our work environment, affect the way we do our jobs. All employees want and deserve a workplace where they are respected and appreciated. Everyone who works for the Company must contribute to such an environment, and supervisors and managers have a special responsibility to foster a workplace that supports honesty, integrity, respect, and trust.

## ***Employee Privacy***

We respect the privacy and dignity of all individuals. The Company collects and maintains personal information that relates to your employment. Special care is taken to limit access to an employee's personal information to Company personnel with a legitimate need to know such information. Members of the Company who are responsible for maintaining employee personal information and those who are provided access to such information must not disclose private information in violation of applicable law or in violation of the Company's policies.

Your personal items, messages, or information that you consider to be private should not be placed or kept in the Company's telephone systems, computer or electronic mail systems, office systems, offices, workspaces, or in any other office storage space, whether physical or virtual. The Company reserves all rights, to the fullest extent permitted by law, to inspect such systems and areas and to retrieve information or property from them when deemed appropriate in the judgment of management.

## ***Equal Employment Opportunity and Non-discrimination***

Hussey Copper provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state, provincial or local laws in all the Countries in which we operate.

This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, and transfer, leaves of absence, compensation, and training.

## RESPONSIBILITY TO OUR ORGANIZATION

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Company employees, officers and directors are expected to dedicate their best efforts to advancing the Company's interests and to make decisions that affect the Company based on legally and ethically achieving the Company's best interests, independent of outside influences.

### ***Conflicts of Interest***

A conflict of interest occurs when your private interests interfere, or even appear to interfere, with the interests of the Company. A conflict situation can arise when you take actions or have interests that make it difficult for you to perform your Company work objectively and effectively. Your obligation to conduct the Company's business in an honest and ethical manner includes the ethical handling of actual, apparent, and potential conflicts of interest between personal and business relationships. This includes full disclosure of any actual, apparent, or potential conflicts of interest as set forth below.

Special rules apply to executive officers and directors who engage in conduct that creates an actual, apparent, or potential conflict of interest. Before engaging in any such conduct, executive officers and directors must make full disclosure of all facts and circumstances to and obtain the prior written approval of the Compliance Officer.

Although we cannot list every conceivable conflict, what follows are some common examples of actual, apparent, and potential conflicts of interest. If you are involved in a potential conflicts situation that is not described below, you should discuss your situation with your supervisor or the Compliance Officer.

### ***Improper Personal Benefits from the Company***

Conflicts of interest arise when an employee, officer, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company. You may not accept any benefits from the Company that have not been duly authorized and approved pursuant to Company policy and procedure, including any Company loans or guarantees of your personal obligations. The Company will not make any personal loans to nor guarantee the personal obligations of executive officers or any other personnel without the prior written approval of the Compliance Officer.

## ***Financial Interests in Other Businesses***

You may not own an interest in a company that competes with Hussey Copper. You may not own an interest in a company that does business with the Company (such as a Company customer or supplier) without the prior written approval of the Compliance Officer. However, it is not typically considered a conflict of interest (and therefore, prior approval is not required) to have an interest of less than one half of 1% of the outstanding shares of a publicly traded company.

## ***Business Arrangements with the Company***

Without prior written approval from the Compliance Officer, you may not participate in a joint venture, partnership, or other business arrangement with the Company.

## ***Outside Employment or Activities with a Competitor***

Simultaneous employment with or serving as a director of a competitor of the Company is strictly prohibited, as is any activity that is intended to or that you should reasonably expect to advance a competitor's interests. You may not market products or services in competition with the Company's current or potential business activities. It is your responsibility to consult with the Compliance Officer to determine whether a planned activity will compete with any of the Company's business activities before you pursue the activity in question.

## ***Outside Employment with a Customer or Supplier***

Without prior written approval from the Compliance Officer, you may not be a customer or be employed by, serve as a director of or represent a customer of the Company. Similarly, without prior written approval from the Compliance Officer, you may not be a supplier or be employed by, serve as a director of or represent a supplier to the Company. Nor may you accept money or benefits of any kind as compensation or payment for any advice or services that you may provide to a client, supplier, or anyone else in connection with its business with the Company.



## ***Family Members Working in the Industry***

You may find yourself in a situation where your spouse, significant other, children, parents, in-laws, or someone else with whom you have a close familial relationship is a competitor, supplier or customer of the Company or is employed by one. Such situations are not prohibited but they call for extra sensitivity to security, confidentiality, and conflicts of interest.

To remove any possible suspicions, you must disclose your specific situation to Human Resources as soon as the issue becomes known to you.

## ***Corporate Opportunities***

Employees and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. If you learn of a business or investment opportunity through the use of Company property or information or your position at the Company, such as from a competitor or actual or potential customer, supplier or business associate of the Company, you may not participate in the opportunity or make the investment without the prior written approval of the Compliance Officer. Such an opportunity should be considered an investment opportunity for the Company in the first instance. You may not use Company property or information or your position at the Company for improper personal gain, and you may not compete with the Company.

## ***Entertainment, Gifts and Gratuities / Receipt of Gifts and Entertainment***

When you are involved in making business decisions on behalf of the Company, your decisions must be based on uncompromised, objective judgment. Employees interacting with any person who has business dealings with the Company (including suppliers, customers, competitors, contractors, and consultants) must conduct such activities in the best interest of the Company, using consistent and unbiased standards.

You must never ask for gifts, entertainment or any other business courtesies from people doing business with the Company. Unsolicited gifts and business courtesies, including meals and entertainment, are permissible if they are customary and commonly accepted business courtesies; not excessive in value; and given and accepted without an expressed or implied understanding that you are in any way obligated by your acceptance of the gift. Gifts that are extravagant in value or unusual in nature should not be accepted. Any gifts of cash or cash equivalents in any amount are prohibited and must be returned promptly to the donor.

## ***Offering Gifts and Entertainment***

When you are providing a gift, entertainment, or other accommodation in connection with Company business, you must do so in a manner that is in good taste and without excessive expense. You may not furnish or offer to furnish any gift that is of more than token value or that goes beyond the common courtesies associated with accepted business practices. You should consider the same factors when determining when it is appropriate to give gifts.

Our suppliers and customers likely have gift and entertainment policies of their own. You must be careful never to provide a gift or entertainment that violates the other company's gift and entertainment policy.

What is acceptable in the commercial business environment may be entirely unacceptable in dealings with the government. There are strict laws that govern providing gifts or other business courtesies – including meals, entertainment, transportation, and lodging – to government officials and employees. You must not give or offer anything of value to any government official without first ensuring that your conduct is permissible under applicable law.

Giving or receiving any payment or gift in the nature of a bribe or kickback is absolutely prohibited.

## ***Political Activities***

You are encouraged to give your personal time and funds to support the political candidates and charitable causes of your choice. In all cases, you are expected to act responsibly and keep your activities separate from the workplace. In addition, you may not use Company money, Company time, or the Hussey Copper name in pursuing political matters, whether acting publicly or in a private forum, including through social media, without prior written approval from the Compliance Officer.

## ***Trade Controls and Prohibited Parties***

The US and other governments often control where, to who, and for what end-use we can export our products, and related technology and services. There are also more general controls on conducting any transaction with certain restricted and prohibited countries, governments and other entities, and individuals. The Company is committed to complying with all US export and sanctions laws and regulations, as well as similar laws in other countries in which

we operate. The Company also is committed to complying with the import and other Customs laws applicable to our business. It is therefore essential that we conduct appropriate due diligence before engaging in any transaction, particularly when the transaction involves a foreign party, or a shipment is being made internationally.

### ***Protection and Proper Use of Company Assets***

We each have a duty to protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability, so we must take measures to prevent damage to and theft or misuse of Company property. When you exit the Company, all Company property must be returned. Except as specifically authorized, Company assets, including time, equipment, materials, resources, and proprietary information, must be used for business purposes only.

### ***Company Books and Records***

It is Company policy to make full, fair, accurate, timely and understandable disclosures when required to comply with applicable laws, regulations, contractual obligations, and in all reports and documents that the Company files with, or submits to, government agencies, vendors, and owners, and in all other public communications made by the Company.

You must complete all Company documents accurately, truthfully, and in a timely manner, including all travel and expense reports. You must record the Company's financial activities in compliance with all applicable laws and accounting practices. The making of false or misleading entries, records or documentation is strictly prohibited. You must never create a false or misleading report or make a payment or establish an account on behalf of the Company with the understanding that any part of the payment or account is to be used for a purpose other than as described by the supporting documents.

### ***Environmental Matters***

Federal, state, provincial or local laws in all locations in which we operate extensively regulate environmental matters and impose serious restrictions regarding the handling and disposal of toxic, hazardous, and non-hazardous substances and waste. The Company is committed to operating its facilities in compliance with all such environmental standards and works to continuously improve the effectiveness of the Environmental Management System at its

facilities. The Company maintains programs for compliance with environmental regulations that may include notification to proper authorities upon the occurrence of certain incidents. All employees are expected to be familiar with the environmental standards applicable to their positions and to comply with all environmental laws. Employees must report all actual or potential environmental hazards upon discovery.

## ***Record Retention***

In the course of its business, the Company produces and receives large numbers of records. Numerous laws require the retention of certain Company records for various periods of time. The Company is committed to compliance with all applicable laws and regulations relating to the preservation of records. The Company's policy is to identify, maintain, safeguard, and destroy or retain all records in the Company's possession on a systematic and regular basis.

If you learn of a subpoena or a pending or contemplated litigation or government investigation, you should immediately contact the Compliance Officer. The Compliance Officer will, as appropriate, work with legal counsel and the Company's information technology resources to help ensure that appropriate preservation measures are put in place.

## ***Confidential and Trade Secret Information***

You must maintain the confidentiality of information entrusted to you by the Company or our customers, except when disclosure is authorized or legally mandated, provided you first discuss the situation with your supervisor or the Compliance Officer.

Employees who possess or have access to confidential information or trade secrets must:

- Not use the information for their benefit or the benefit of persons inside or outside of the Company. Carefully guard against disclosure of that information to persons outside the Company. For example, you should not discuss such matters with family members or business or social acquaintances or in places where the information may be overheard, such as taxis, public transportation, elevators, or restaurants. In addition, when disclosure is authorized, such information must be marked "Confidential and Proprietary Hussey Copper Information" or with other similar protective legend(s) as may be recommended by the Compliance Officer.
- Not disclose confidential information to another Company employee unless the employee needs the information to fulfill business responsibilities.

Your obligation to treat confidential or trade secret information as confidential remains in effect for as long as such information is considered a “trade secret” as defined by applicable law. Upon exiting the organization, if requested, you must return everything that belongs to the Company, including all documents and other materials containing Company and customer confidential information. You must not use or disclose confidential information for the benefit of yourself, a new employer, or any other third parties after ceasing to be employed by the Company.

## **Trademarks, Copyrights and Other Intellectual Property**

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### ***Trademarks***

The name Hussey Copper, and the related logos of the Company are examples of Company trademarks. You must always properly use our trademarks and advise your supervisor or the Compliance Officer of infringements by others. Similarly, the trademarks of third parties must be used properly. Should you have any question about the proper usage of any Company logo, before using the mark, obtain guidance from the Compliance Officer.

### ***Copyright Compliance***

Works of authorship such as books, articles, drawings, computer software and other such materials may be covered by copyright laws. It is a violation of those laws and of the Company’s policies to make unauthorized copies of or derivative works based upon copyrighted materials.

In most instances, our computer software is protected by copyright. You may not make, acquire, or use unauthorized copies of computer software. Any questions concerning copyright laws or computer software licensing should be directed to the Compliance Officer.

### ***Intellectual Property Rights of Hussey Copper***

The use of Company assets by an employee, including time, equipment, materials, resources, and proprietary information, which results in work product such as patent applications, internal reports, product designs, drawings, and other such intellectual property and trade secrets conceived or reduced to practice shall be assigned to Hussey Copper.

## ***Intellectual Property Rights of Others***

It is Company policy not to infringe upon the intellectual property rights of others. When using the name, trademarks, logos, or printed materials of another company, including any such uses on the Company's websites, you must do so properly and in accordance with applicable law.

## ***Computer and Communication Resources***

The Company's computer and communication resources, including computers, voice mail and email, provide substantial benefits, but they also present significant security and liability risks to you and the Company. It is extremely important that you take all necessary measures to secure your computer and any computer or voicemail passwords. If you have any reason to believe that your password or the security of a Company computer or communication resource has in any manner been compromised, you must change your password immediately and report the incident to the Information Technology Department and your Manager.

When you are using Company resources to send email, voice mail or to access Internet services, you are acting as a representative of the Company. Any use of these resources that may reflect poorly on the Company, damage its reputation, and expose you and the Company to legal liability is prohibited. All of the computing resources used to provide computing and network connections throughout the organization are the property of the Company and are intended for use by Company employees to conduct the Company's business. Incidental and occasional personal use of email and telephones is permitted, but such use should be minimized.

When communicating sensitive information or information with data that may raise privacy concerns, the files should either be password protected, encrypted, or transmitted through approved FTP sites.

You should not use Company resources in a way that may be disruptive, offensive to others, or unlawful. At all times, when sending email or transmitting any other message or file, you should not transmit comments, language, images, or other files that you would be embarrassed to have read by any person.

## ***Responding to Inquiries from the Press and Others***

Company employees who are not official Company spokespersons may not speak with the press, securities analysts, other members of the financial community, or groups or organizations as a Company representative or about Company business unless specifically authorized to do so by the Compliance Officer. Requests for financial or other

information about the Company from the media, the press, the financial community, shareholders, or the public should be referred to the Chief Financial Officer or the Compliance Officer. Requests for information from regulators or the government should be referred to the Compliance Officer.

## **FAIR DEALING**

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The Company depends on its reputation for quality, service, and integrity. The way we deal with our customers, competitors and suppliers molds our reputation, builds long-term trust, and ultimately determines our success. You should endeavor to deal fairly with the Company's customers, suppliers, competitors, and representatives. We must never take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing or practice.

### ***Antitrust Laws***

While the Company competes vigorously in all of its business activities, its efforts in the marketplace must be conducted in accordance with all applicable antitrust and competition laws. While it is impossible to describe antitrust and competition laws fully in any code of business conduct, this Code will give you an overview of the types of conduct that are particularly likely to raise antitrust concerns. If you are or become engaged in activities similar to those identified in the Code, you should consult the Compliance Officer for further guidance.

### ***Conspiracies and Collaborations among Competitors***

One of the primary goals of the antitrust laws is to promote and preserve each competitor's independence when making decisions on price, output, and other competitively sensitive factors. Some of the most serious antitrust offenses are agreements between competitors that limit independent judgment and restrain trade such as agreements to fix prices, restrict output or control the quality of products, or to divide a market for customers, territories, products, or purchases. You should not agree with any competitor on any of these topics, as these agreements are virtually always unlawful.

Unlawful agreements need not take the form of a written contract or even express commitments or mutual assurances. Courts can -- and do -- infer agreements based on "loose talk," informal discussions, or the mere exchange between competitors of information from which pricing or other collusion could result. Any communication

with a competitor's representative, no matter how innocuous it may seem at the time, may later be subject to legal scrutiny and form the basis for accusations of improper or illegal conduct. You should take care to avoid involving yourself in situations from which an unlawful agreement could be inferred.

By bringing competitors together, trade associations and standard-setting organizations can raise antitrust concerns, even though such groups serve many legitimate goals. You must notify the leader for your business unit before joining any trade associations or standard-setting organizations. Further, if you are attending a meeting at which potentially competitively sensitive topics are discussed without oversight by an antitrust lawyer, you should object, leave the meeting, and notify the Compliance Officer immediately.

## ***Distribution Issues***

Relationships with customers and suppliers can also be subject to antitrust prohibitions if these relationships harm competition. For example, it can be illegal for a company to affect competition by agreeing with a supplier to limit that supplier's sales to any of the company's competitors. Collective refusals to deal with a competitor, supplier or customer may be unlawful as well. While a company is allowed to decide independently that it does not wish to buy from or sell to a particular person, when such a decision is reached jointly with others, it may be unlawful regardless of whether it seems commercially reasonable. Finally, it is always unlawful to restrict a customer's re-selling activity through minimum resale price maintenance (for example, by prohibiting discounts).

Other activities that can raise antitrust concerns are:

- discriminating in terms and services offered to customers where a company treats one customer or group of customers differently than another.
- exclusive dealing agreements where a company requires a customer to buy from, or a supplier to sell to, only that company.
- tying arrangements where a customer or supplier is required, as a condition of purchasing one product, also to purchase a second, distinct product.
- "Bundled discounts," in which discount or rebate programs link the level of discounts available on one product to purchases of separate but related products (for example, pencils linked to other office supplies); and
- "Predatory pricing," where a company offers a discount that results in the sales price of a product being below the product's cost (the definition of cost varies depending on the court), with the intention of sustaining that price long enough to drive competitors out of the market.

Because these activities are prohibited under many circumstances, you should consult the Compliance Officer before implementing any of them.



## ***Gathering Information About the Company's Competitors***

In gathering competitive information, you should abide by the following guidelines:

- We may gather information about our competitors from sources such as published articles, advertisements, brochures, surveys by consultants and conversations with our customers. You should be able to identify the source of any information about competitors.
- We must never attempt to acquire a competitor's trade secrets or other proprietary information through unlawful means, such as theft, spying, bribery, or breach of a competitor's nondisclosure agreement.
- If there is any indication information you are offered was not lawfully received by the party in possession, you should refuse to accept it. If you receive any competitive information anonymously or that is marked confidential, you should not review it and should contact the Compliance Officer immediately.

## **RESPONSIBILITY TO OUR PEOPLE**

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### ***Harassment***

Company policy strictly prohibits any form of harassment in the workplace. The Company will take prompt and appropriate action to prevent and, where necessary, discipline behavior that violates this policy.

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment.
- Submission to, or rejection of, such conduct is used as a basis for employment decisions; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, offensive or hostile work environment.

Forms of sexual harassment include, but are not limited to, the following:

- Verbal harassment, such as unwelcome comments, jokes, or slurs of a sexual nature.
- Physical harassment, such as unnecessary or offensive touching, or impeding or blocking movement; and
- Visual harassment, such as derogatory or offensive clothing, posters, cards, cartoons, graffiti, drawings, or gestures.

## ***Other Forms of Harassment***

Harassment based on other protected characteristics is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that degrades or shows hostility or hatred toward an individual because of his or her race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state, provincial or local laws in the Countries in which we operate.

Harassing conduct includes, but is not limited to, the following: epithets; slurs; negative stereotyping; threatening, intimidating or hostile acts; and written or graphic material that ridicules or shows hostility or aversion to an individual or group and that is posted on Company premises or circulated in the workplace.

## ***Reporting Responsibilities and Procedures***

If you believe you have been subjected to harassment of any kind, you should promptly report the incident to your supervisor, Human Resources, the Compliance Officer, or any other member of Management. Complaints of harassment, abuse or discrimination will be investigated promptly and thoroughly and will be kept confidential to the extent possible.

The Company encourages the prompt reporting of all incidents of harassment regardless of whom the offender may be or the offender's relationship to the Company. This procedure should also be followed if you believe that a non-employee with whom you are required or expected to work has engaged in prohibited conduct. Supervisors must promptly report all complaints of harassment to Human Resources or the Compliance Officer.

An employee who is found to be responsible for harassment, or for retaliating against any individual for reporting a claim of harassment or cooperating in an investigation, will be subject to disciplinary action up to and including termination.

## ***Safety in the Workplace***

The safety and security of employees is of primary importance. The Company is committed to providing a safe working environment in accordance with all federal, state, and local regulations. You are responsible for contributing to a successful, safe work environment by maintaining our facilities free from recognized hazards and obeying all Company safety rules, including wearing all required protective equipment. Working conditions should be

maintained in a clean and orderly state to encourage efficient operations and promote good safety practices. Unsafe practice will not be tolerated, and employees must report all unsafe conditions upon discovery.

### ***Weapons and Workplace Violence***

No employee may bring firearms, explosives, incendiary devices or any other weapons into the workplace or any work-related setting regardless of whether or not employees are licensed to carry such weapons. Similarly, the Company will not tolerate any level of violence in the workplace or in any work-related setting. Violations of this policy must be immediately referred to your supervisor and Human Resources. Threats or assaults that require immediate attention should be reported to the police or local authorities.

### ***Drugs and Alcohol***

The Company intends to maintain a drug-free work environment. You may not use, possess or be under the influence of alcohol on Company premises. You cannot use, sell, attempt to use, or sell, purchase, possess or be under the influence of any illegal drug on Company premises or while performing Company business on or off the premises. You cannot be legally impaired by any drug on Company premises or while performing Company business on or off the Company premises.

### ***Wage and Hour Matters***

The Company has established policies to comply fully with all state, provincial, federal, and local laws in all the Countries in which we do business relating to wages, hours of work, overtime, and related matters. The Company does not permit employees to "work off the clock" nor will it tolerate any other failure to comply with applicable wage/hour laws. Employees should raise any questions or concerns regarding wage/hour matters with Human Resources.

## IMPLEMENTATION OF THE CODE

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### ***Responsibilities***

While each of us is individually responsible for putting the Code to work, we need not go it alone. The Company has several resources, people, and processes in place to answer our questions and guide us through complex decisions. The Company will also provide regular training on the Code to ensure personnel remain aware of their obligations under the Code and other Company policies and procedures.

Copies of this Code are available from the Human Resources department, on the Company's Intranet and on the Company's website.

### ***Seeking Guidance***

This Code cannot provide definitive answers to all questions. If you have questions regarding any of the policies discussed in this Code or if you are in doubt about the best course of action in a particular situation, you should seek guidance from your supervisor or other resources identified in this Code, including the Compliance Officer, Human Resources, the CFO, or another member of senior management.

### ***Reporting Code of Conduct Violations***

If you know of or suspect a violation of applicable laws or regulations, the Code, or the Company's related policies, you must immediately report that information to your supervisor, the Compliance Officer or to Human Resources. If you are uncomfortable speaking with any of these individuals about a suspected violation, you are encouraged to contact the Compliance Helpline where you will be able to make an anonymous report (see below How to Report Violations).

No one will be subject to retaliation because of a good-faith report of suspected misconduct.

## ***Reports Regarding Accounting Matters***

The Company is committed to compliance with applicable laws, rules, and regulations related to accounting standards and internal controls. You are expected to report any complaints or concerns regarding accounting, internal accounting controls and auditing matters promptly.

Reports may be made to the Compliance Officer, CFO, or to the Compliance Helpline in the manner discussed below.

## ***How to Report Violations***

As a first step, we encourage you to reach out to your Supervisor, the Compliance Officer, Human Resources, or any member of senior management to discuss your concerns. If you believe that you need to keep your concern confidential, the Company has established the Compliance Helpline, which can be accessed as follows:

- Email: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (Must include Hussey as the company name with report).
- Anonymous hotline: (855) 222- 2184 option #3
- <https://www.lighthouse-services.com/husseycopper>

## ***Investigations of Suspected Violations***

All reported violations will be promptly reviewed and treated confidentially to the extent reasonably possible. It is imperative that reporting persons not conduct their own preliminary investigations. Investigations of alleged violations may involve complex legal issues and acting on your own may compromise the integrity of an investigation and adversely affect both you and the Company.

## ***Discipline for Violations***

The Company intends to use every reasonable effort to prevent the occurrence of conduct not in compliance with its Code and to halt any such conduct that may occur as soon as reasonably possible after its discovery. Subject to applicable law and agreements, Company personnel who violate this Code and other Company policies and procedures may be subject to disciplinary action up to and including termination.

## ***Penalties***

In addition to disciplinary action the Company may take against personnel, significant penalties may be imposed by the government against the Company and individual personnel who violate the law. Failure to comply can lead to jail terms for individuals and large criminal fines and other monetary penalties for both the Company and individuals. In addition, private parties may bring suit to recover damages.

Ultimate responsibility to ensure that we as a Company comply with the many laws, regulations and ethical standards affecting our business rests with each of us. You must become familiar with and conduct yourself strictly in compliance with those laws, regulations and standards and the Company's policies and guidelines pertaining to them.

## ***No Rights Created***

This Code is a statement of the fundamental principles and key policies and procedures that govern the conduct of the Company's business. It is not intended to and does not create any obligations to or rights in any employee, director, client, supplier, competitor, shareholder or any other person or entity.

The Code is also a statement of policies for individual and business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment. Employees of the Company are employed at-will except when covered by an express, written employment agreement. This means that you may choose to resign your employment at any time, for any reason or for no reason at all. Similarly, the Company may choose to terminate your employment at any time, for any legal reason or for no reason at all, but not for an unlawful reason.