

TRADE COMPLIANCE POLICY

This Trade Compliance Policy (the “Policy”) applies to all Hussey Copper (“Hussey”) operations and all Hussey personnel. For purposes of this Policy, “Hussey” means Hussey and each of its subsidiaries, all Hussey employees, and any other person or entity acting on behalf of Hussey.

Hussey is committed to complying with all applicable laws that cover exports of our products, technology, and services. This Policy briefly summarizes the trade laws and compliance obligations applicable to our company, our employees, and other parties that act on our behalf.

This Policy is focused on U.S. trade laws. As described below, U.S. trade laws often apply to our operations outside the United States and cover the actions of non-U.S. individuals.

It is important to recognize that other countries and organizations, such as the European Union and the United Nations, maintain controls on exports to and transactions with certain countries, governments, and individuals. Personnel must be aware that different trade laws may be applicable to transactions conducted outside the United States.

The Compliance Officer has been given primary responsibility to implement this Policy; however, adherence to this Policy is the responsibility of all of us. All personnel are expected to raise with the Compliance Officer any question or concern about the appropriateness or lawfulness of a proposed action that may implicate this Policy.

Relevant Laws

Export Laws. U.S. export controls cover exports of commodities, software, and technology (any of which is an “item”), regardless of where manufactured, from the United States. U.S. law also covers re-exports, *i.e.*, when a product manufactured in the United States is shipped from one non-U.S. country to another. Depending on the situation, we may sometimes need to obtain a license from the U.S. Commerce Department to make an export or re-export.

Economic Sanctions. The U.S. government maintains economic sanctions on designated countries, governments, entities, and individuals. The scope of who must comply with U.S. sanctions is extremely broad and includes:

- All U.S. citizens and lawful permanent residents, wherever located.
- All persons in the United States, regardless of nationality.
- All companies organized or located in the United States; and
- All non-U.S. persons who work for a U.S. company.

In many cases, U.S. sanctions also apply to non-U.S. parties acting on our behalf.



As a general matter, U.S. law prohibits both direct transactions (*e.g.*, a sale from the United States to a designated party) and indirect transactions (*e.g.*, a sale to a distributor that sells our product to a designated party) with a designated party or involving a country subject to U.S. sanctions.

Anti-Boycott Laws. The U.S. government prohibits U.S. persons and companies from agreeing to comply with the Arab League boycott of Israel. It is important to check invoices, lease documents, requests for proposals, purchase orders, and other sales or ordering documents to ensure there is no language to suggest we support the boycott in any way. For example, it would be prohibited for us to agree to only supply products that are not of Israeli origin, or to agree to not ship goods on a vessel included on a country's Israel boycott list.

Penalties / Disciplinary Action. Significant penalties may be imposed for violations of U.S. trade laws, including monetary penalties of up to \$300,000 or more per violation. Individuals may be sent to prison. Violations can also lead to administrative penalties such as the loss of export privileges. In addition, any person that violates this policy or applicable trade laws may be subject to disciplinary action, up to and including termination.

Compliance Responsibilities

To protect against violations of applicable trade laws, we must review the parties involved in any international transaction. Such a review is necessary whether a transaction is initiated from inside or outside the United States. Records of such reviews must be maintained.

Screening. Each international transaction must be screened to determine whether it involves a prohibited country or party. Screening can be conducted manually using the U.S. government's consolidated screening list, which is available at: www.trade.gov/consolidated-screening-list. The results of screening should be maintained by the person who conducted the screening.

In the case of an actual or potential screening match, the transaction must be halted until the screening results can be reviewed by the Compliance Officer. In any case, when a review by the Compliance Officer is necessary, the Compliance Officer should maintain copies of all records created in connection with their review.

Red Flags / Warning Signs. Personnel must be vigilant and identify compliance red flags or warning signs or other unusual circumstances that may suggest a problem with a transaction. For example, it would be a red flag if a customer requested that we ship a product to them via an unusual shipping route, refused to provide information about the ultimate use, or destination of a product, or wanted to pay in cash for a transaction that normally would be financed. Promptly notify the Compliance Officer whenever a warning sign is identified.



Training. To assist personnel to comply with this Policy and applicable law, the Company will provide regular, appropriate compliance training.

Records / Reviews. Under U.S. law, we are required to maintain records related to our export transactions for at least five years from the date of the transaction. If it is ever necessary to apply for an export license or other authorization, all records related to the application should be maintained by the Compliance Officer.

In addition, to promote compliance and to identify and address potential compliance issues, we will conduct compliance reviews whenever necessary. Personnel are expected to cooperate fully with any such review.

Reporting Concerns. Hussey personnel are expected to report activity that may violate applicable international trade laws or fails to comply with this Policy. If you learn of an actual or possible violation of international trade law, immediately report the matter to your manager, the Compliance Officer, or another member of senior management. You may also report your concern anonymously:

Hussey's **anonymous** reporting hotline
(855) 222-2184 or via the web at

<https://www.lighthouse-services.com/husseycopper>

Questions. If you have questions concerning applicable international trade laws or the interpretation of this Policy, contact your manager or the Compliance Officer.

Hussey strictly prohibits retaliation of any kind against any person who makes a report in good faith.