



Supplier Code of Conduct

Lithos Resources is committed to operating its business ethically and in compliance with all laws and regulations. We strive to share, uphold, and embody ethical and business principles that clearly set out how we do business and engage with each other and the community. We expect all of our suppliers, vendors, contractors, and service providers, including their staff, agents, and subcontractors (“Suppliers”), to embody our values, abide by our policies and practices, and comply with all applicable laws, rules, and regulations and industry standards.

Suppliers are responsible for staying up to date on Lithos’ expectations in addition to any legal and regulatory requirements for proper compliance and governance. If you do not have a copy of any policy mentioned herein, please ask a Lithos manager or supervisor. Lithos will take appropriate disciplinary action for violation of Lithos’ policies, up to and including termination of a Supplier’s contract or referral for legal action, based on the severity of the violation and individual circumstances. If any doubt arises as to the meaning or interpretation of these requirements, or if any conflict is identified between a Supplier’s policies or practices and those of Lithos, the Supplier must consult with the appropriate Lithos manager or supervisor.

Integrity

Suppliers must maintain integrity, ethics, transparency, and compliance in all business conducted. Suppliers must establish a way for employees and stakeholders to report concerns or potential violations of the law, regulation, or this Supplier Code of Conduct. Lithos maintains a Compliance Reporting function (which can be contacted at compliance@lithosresources.com) to enable internal and external stakeholders to report confidentially to Lithos’ Office of the General Counsel any unethical, illegal, or otherwise inappropriate behavior they may observe. Suppliers and their staff are encouraged to use our Compliance Reporting function to report concerns or potential violations related to Lithos employees or business. Lithos does not tolerate any form of retaliation, including threats, discrimination, or discipline against anyone who reports a concern in good faith or participates in an investigation. Retaliation of this nature is a violation of this Supplier Code of Conduct and the law. Any act of retaliation will result in discipline, up to and including termination of a contract.

Conflict of Interest: Suppliers should declare any potential, perceived, or actual conflict of interest in relation to Lithos staff or other Suppliers or subcontractors to the appropriate Lithos manager or supervisor. Conflicts of interest arise when a person’s financial interests or personal relationships conflict, potentially conflict, or appear to conflict with their professional responsibilities or Lithos’ business interests. Lithos expects its staff and all Suppliers to avoid these actual or perceived conflicts because they can erode trust and harm Lithos’ reputation.

Fraud: Suppliers should implement appropriate and effective procedures to detect and prevent any form of bribery, corruption, kickbacks, or embezzlement.

Acceptance of Gifts: Suppliers should not offer or provide any gift, meal, beverages,

entertainment, or other personal benefit to a Lithos employee or contractor (or family member of the same) which are not in compliance with Lithos' Acceptance of Gifts policy, or which may improperly influence, or appear to influence, business decisions.

Intellectual Property: Suppliers must respect, and not infringe upon, intellectual property rights of others and must abide by all applicable software and data licensing obligations implicated in their work with Lithos.

Privacy & Confidentiality: Suppliers must abide by all applicable privacy and information security laws and best practices for the use and protection of private, confidential, proprietary, privileged, protected, or material nonpublic information. Suppliers must appropriately safeguard the privacy and personal information of customers, employees, and stakeholders. Suppliers must also protect against the unauthorized use or misuse of any Lithos information or data. This obligation continues even after the particular job or working relationship with Lithos ceases.

Proper Use of Lithos Assets: Suppliers should protect and ensure proper and legitimate use of all Lithos assets. Protecting against theft, loss, and misuse of Lithos assets is the responsibility of all Suppliers and Lithos employees. If a Supplier becomes aware of any theft, loss, or misuse of Lithos assets, they should raise the issue with appropriate Lithos personnel or report the issue to Lithos' Office of the General Counsel at compliance@lithosresources.com.

Policies & Practices: Suppliers must actively support Lithos' policies, practices, and protocols. Suppliers should provide mechanisms for reporting concerns or potential violations. As stated previously, Suppliers and their staff are encouraged to use Lithos' Compliance Reporting function to report concerns or potential violations related to Lithos employees, other Supplier, or Lithos' business. Suppliers must prohibit any form of retaliation against an individual for reporting a concern in good faith or participating in an investigation.

Public Disclosure: Suppliers must not speak on behalf of Lithos in any form or capacity unless such Supplier has been specifically and formally approved by authorized Lithos personnel.

Political Donations or Statements: No Supplier should make any political donation to any party, candidate, or cause, or make any political statement, on behalf of Lithos at any time.

Health, Safety & Environment

Lithos Energy is committed to protecting our environment, community, and the health and safety of all affected by our activities throughout the lifecycle of our operations. Safety is a core value at Lithos and we require the same from our Suppliers. Suppliers must have an Environment, Health & Safety (EHS) management system or program that—at the very least—meets industry standards and applicable laws, rules, and regulations, and such EHS program must be at least as comprehensive and strict as Lithos' EHS Management Program, including Lithos' EHS Compliance Manual and Drug & Alcohol Policy.

We expect our Suppliers to proactively identify and effectively control potential risks and hazards in all operations. We believe that all workplace injuries, illnesses, and incidents are preventable, and that no job is worth doing if it cannot be performed safely. All individuals performing work for Lithos must be fit for work. Suppliers must operate in an environmentally responsible manner, use their best efforts to minimize adverse impacts on the environment, and adhere to all applicable environmental laws, rules, regulations, and orders.

Suppliers must:

- operate in a manner that is consistent with Lithos' fundamental commitment to safety and environmental stewardship and do their part to achieve best-in-class safety performance;
- provide all employees and subcontractors with clear direction and expectations, and uphold proper procedures to detect, prevent, and handle potential risks related to the environment, health, safety, and the security of people;
- provide a reasonably safe workplace, and one free of all forms of harassment or violence;
- comply with all applicable laws, rules, and regulations, as well as industry standards, related to their business, including with respect to the environment, health, and safety.

Anti-Corruption and Bribery

Suppliers must comply with all applicable anti-corruption laws and regulations related to their work with Lithos. This includes compliance with Acts such as the US Foreign Corrupt Practices Act. Suppliers must not tolerate or engage in any form of corruption. Suppliers must not make, offer, or authorize (directly or indirectly) any unlawful payment, gift, or promise of benefit to anyone on behalf of Lithos. Suppliers must transact all Lithos-related business with transparency and record and report transactions appropriately.

Antitrust and Competition

Suppliers must compete fairly in the industry market and follow all antitrust and competition laws. Suppliers must not influence a market or take unfair advantage of anyone through manipulation, concealment, use of proprietary, confidential, or privileged information, misrepresentation of material facts, or any other act that may unfairly impact competition, such as bid rigging, price fixing, market allocation, manipulation of a bid process, or misleading or false claims.

Records Management & Accuracy

Suppliers must maintain accurate business and operational records as required by law, industry standards, and any contract with Lithos, and provide reasonable access to Lithos as required.

Suppliers must:

- maintain appropriate business, financial, and operational records, as required by industry best practice and applicable law, rule or regulation;
- conduct reasonable internal financial audits to ensure reliability and accuracy of records;
- abide by and support all creditworthiness verifications, records audits, inspections, and the like; and
- be prepared to submit their EHS program and performance information for verification by Lithos or its agent, which may include additional site access, documentation, interviews, and subcontractor information.

Respectful Workplace Practices & Labor Laws

Suppliers must implement and uphold respectful workplace practices, be committed to making fair and lawful employment decisions, and treat all individuals with dignity and respect. This includes a commitment to providing a safe, professional, respectful, and productive work environment. Suppliers must implement and uphold appropriated processes to prevent, review, remedy, and discipline unacceptable conduct.

Suppliers must protect, respect, and support human rights measures and comply with all relevant local, state, federal, tribal, and international labor and human rights laws. Suppliers must ensure that all legal and statutory requirements are met with respect to all of their workers.

Suppliers must:

- exercise fair and lawful hiring practices and provide a work environment free of harassment, discrimination, bullying, violence, intimidation, and any other unlawful behavior;
- comply with applicable employment, labor, and human rights laws governing work hours and compensation, including minimum wage, overtime, and benefits;
- employ workers who are legally authorized to work in the location at which Supplier provides services or goods to Lithos, and validate an employee's work eligibility status;
- comply with all applicable laws and regulations regarding freedom of association and collective bargaining;
- not use or tolerate the use of forced, coerced, or child labor; and
- understand the important role our industry plays in identifying and preventing human trafficking through increased employee awareness.

Trade Laws

Suppliers must uphold all applicable national and international trade and commodities laws, including economic sanctions, embargoes, and trade or use restrictions related to their business with Lithos.

Community

It is a priority for Lithos to be a meaningful part of the social and economic fabric of the communities in which we operate. Building and maintaining the trust that others place in us—and that we have for one another—is fundamental to our success, as is supporting and giving back to the communities in which we operate. We strive to employ local Suppliers as much as possible and encourage our Suppliers to support the local economy and community as well.

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