



Supplier Code of Conduct (SCC)

INTRODUCTION

Future Metals LLC, a Marmon Group / Berkshire Hathaway Company, (Future Metals) is committed to maintaining the highest standards of integrity, ethics, and sustainability in our business and supply chains. In keeping with our cornerstone values of Trust and Ethics, we are responsible for the conformity of all externally provided processes, products and services, including from sources defined by the customer. Therefore, we are committed to working only with contractors, sub-contractors, vendors, (third-party) service providers and business partners (collectively, "Suppliers") who adhere to consistent standards and agree to conduct their business in accordance with these principles.

This Supplier Code applies to all individuals and businesses that provide products or services for Future Metals and its subsidiaries, divisions, or affiliates.

As a Future Metals Supplier, you must comply with all applicable laws and regulations in the countries and jurisdictions in which you operate, the requirements set out in this Supplier Code, and your contractual obligations to us. The provisions of this Supplier Code are in addition to, and do not alter or replace, the provisions of any legal agreement or contract between the Supplier and Future Metals or any of its affiliates; including the Future Metals Terms and Conditions of Purchase, available here: <http://www.futuremetals.com/company/suppliers/>. Suppliers are expected to hold their supply chain, including contractors, subcontractors, vendors and third-party labor agencies, to standards equivalent to those contained in this Supplier Code.

If a breach of this Supplier Code occurs, Future Metals may, in its sole discretion, suspend related procurement, refuse or return goods from the Supplier until appropriate corrective action is taken, and/or terminate its business relationship with the Supplier in addition to any other rights or remedies available.

1. HUMAN RIGHTS & MODERN SLAVERY

Future Metals is committed to conducting business in a manner that respects and protects fundamental human rights as set out in the United Nations Universal Declaration of Human Rights. These include the right to life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, slavery, servitude, torture or inhumane treatment; and freedom of speech, thought and religion. We take a zero-tolerance approach to modern slavery in all forms (including debt bondage, servitude, human trafficking and/or forced or child labor) occurring anywhere within our supply chain. In keeping with these commitments, our Suppliers must uphold the following labor practices.



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Forced Labor, Human Trafficking and Child Labor

Suppliers must not use forced labor, including but not limited to any form of involuntary prison labor, human trafficking, forced, bonded, indentured, or slave labor. The use of child labor in working for Future Metals is also prohibited. All Suppliers must be able to certify that materials in their products have not been obtained from companies that use forced or child labor or participate in human trafficking. Future Metals expects its Suppliers to be able to confirm the steps they are taking to ensure modern slavery and labor exploitation are not taking place in their business or supply chain.

Future Metals UK Anti-Slavery and Human Trafficking Policy is available online: <http://www.futuremetals.com/company/anti-slavery-and-human-trafficking-policy-future-metals-uk/>. If a Future Metals Supplier has any reason to believe that modern slavery of any form may exist within our organization or our supply chain or may occur in the future they must notify as soon as possible the Corporate Secretary or the Corporate Compliance Hotline on (+ 1) 704 752 9679.

Hiring and Employment Practices

Suppliers are expected to support and promote diversity in the workplace and provide equal opportunity for all qualified applicants. Suppliers must prohibit employment discrimination based on protected categories, including gender, age, ethnicity, nationality, religion, disability, or marital status. Suppliers must also comply with all local laws and regulations regarding a worker's legal right to work, including verifying work status through appropriate documentation.

Respect & No Harassment

Suppliers must ensure that the personal dignity, privacy, and rights of each individual in their workforce are respected. Suppliers must strive to create a workplace that prohibits any form of unethical treatment, threats of violence, or other forms of physical, mental or sexual harassment.

Compensation and Working Hours

Our Suppliers are required to conduct their operations in ways that promote a humane and productive work environment. Suppliers must compensate employees fairly and follow all applicable local wage, leave and hour labor laws and regulations. Where applicable, Suppliers must adhere to agreed-upon collective bargaining agreements. Suppliers shall ensure that working hours, including overtime, do not exceed applicable legal requirements and that workers are allowed appropriate leave time.

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2. QUALITY STANDARDS

At Future Metals, we believe that quality is not just about what we do, it is about who we are. Future Metals is dedicated to providing the best quality products, services and delivery time which meet or exceed the demands and expectations of our customers through continual review and improvement of our quality system and customer involvement. Consistent with our quality standards, Suppliers must implement, or have implemented and maintain, a quality management system meeting the requirements set out in the latest applicable revisions of EN/AS9100 or EN/AS9120 or another third-party Quality Management System (QMS) deemed equivalent by Future Metals.

In particular, Suppliers shall ensure conformity with respect to Section 7.3 (Awareness) and Section 8.4.3 (a)-(m) (Information for External Supplier) of EN/AS9100 such as, but not limited to, ensuring that they and those in their supply chain are aware of:

- Their contribution to product or service conformity;
- Their contribution to product safety; and
- The importance of ethical behavior.

3. HEALTH, SAFETY AND ENVIRONMENT

At Future Metals we place the highest priority on providing a safe workplace for our employees and to operating in an environmentally sustainable and responsible manner. No consideration, deadline or job is more important than maintaining compliance with all applicable health, safety and environmental laws and standards. Our Suppliers are expected to share our commitment to these core priorities.

Health & Safety

Suppliers must provide a safe and healthy work environment for all employees, customers and anyone else present at their locations. Suppliers should take proactive measures that support accident prevention and minimize health risk exposure. This includes implementation of appropriate systems and procedures in order to prevent, manage, track and report occupational health and safety incidents. Suppliers should also ensure that all workers are sufficiently aware of health and safety risks and are appropriately trained in a language the worker can understand in relation to workplace hazards that they may be exposed to.

Environment & Sustainability

Suppliers are expected to conduct their business in an environmentally responsible way that supports sustainable operations, minimizes their impact on natural resources and protects the environment. Suppliers



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must ensure that their operations comply with all applicable environmental laws and that all related permits, approvals and registrations are current and maintained wherever in the world they are operating.

Restricted Materials/Substances List

Suppliers must maintain sufficient knowledge of input materials and components to ensure they were obtained from permissible sources, in compliance with laws and regulations. If mandated by applicable law, Suppliers are expected to implement appropriate policies and procedures regarding conflict minerals and exercise due diligence with the sourcing of these minerals. Suppliers may be required to show evidence of compliance with these requirements and additional ones such as REACH (Registration, Evaluation, Authorization and Restriction of Chemical) if required by Future Metals or its customers.

4. BUSINESS CONDUCT & INTEGRITY

At Future Metals, operating with integrity is part of who we are and our expectation of all those who work with us. Future Metals is committed to maintaining the highest standards of honest and ethical behavior in its work. We act in compliance with all applicable laws and regulations of the countries where we operate, both within the U.S. and abroad. Acting consistently with these requirements is a condition of selection as one of our Suppliers.

Compliance with Laws

Suppliers must adhere to all applicable laws and regulations in the countries and jurisdictions in which they operate. In particular, Suppliers must never seek to gain an advantage of any kind by acting fraudulently or dishonestly, making false claims or facilitating tax evasion or by allowing anybody else to do so on their behalf. Suppliers must comply with all anti-trust and other anti-competition laws.

Suppliers must comply with all applicable international trade and export control laws and regulations. In keeping with this commitment, while working for Future Metals, Suppliers must not engage in any transactions or other business dealings, whether directly or indirectly, involving businesses or individuals located in countries that are subject of comprehensive sanctions embargoes imposed by the U.S. Government, including Cuba, Iran, North Korea, Syria and the Crimea Region of the Ukraine. Because trade and export restrictions are dynamic and subject to change, Suppliers are expected to maintain up to date compliance with the restrictions published by the relevant authorities in each country where they operate, including the U.S. Office of Foreign Asset Control and U.S. Bureau of Industry and Security. Suppliers must also maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.



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Bribery & Corruption

Suppliers must refrain from involvement in any and all forms of corruption, extortion, embezzlement, bribery and kickbacks. It is strictly prohibited to offer, give or accept improper payments or anything else of value in order to obtain or retain business or to secure a business advantage, whether directly or indirectly via, e.g. a third-party agent or intermediary. Suppliers must ensure that gifts or other business courtesies given to customers (including Future Metals' employees), government officials, and any other party are appropriate in nature and in compliance with all applicable anti-corruption laws.

Conflict of Interest

Suppliers must avoid all ethical, legal, financial or other personal relationships, activities and interests that could present a potential or actual conflict of interest with their work for Future Metals. If a Supplier has a relationship with any Future Metals employee that could represent a conflict of interest, this must be promptly disclosed to Future Metals.

Confidential Information & IP

Proper management of confidential information is critical to the success of both Future Metals and its Suppliers. When working with company resources, Suppliers must protect all Future Metals information, electronic data, and intellectual property with appropriate safeguards. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of Future Metals and its Suppliers. Suppliers may receive Future Metals confidential information only as authorized by a confidentiality or nondisclosure agreement and must comply with their obligations to not disclose the confidential information, to not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorized disclosure. Suppliers may not use the Future Metals trademark, images, or other materials to which Future Metals owns the rights, unless expressly authorized to do so.

5. SUPPLY CHAIN MANAGEMENT SYSTEMS

Suppliers must procure goods and services in a responsible manner and in compliance with this Supplier Code. In particular, Suppliers are expected to communicate our requirements throughout their supply chains by adopting management systems, policies, procedures and training to ensure compliance with all applicable laws and promote the standards and expectations set forth in this Supplier Code. This includes the following aspects:

Supply Chain Transparency and Right of Access

In order to ensure and demonstrate compliance with this Supplier Code, transparency is paramount. Suppliers shall keep records of all relevant documentation in relation to work undertaken for Future Metals which may be



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reviewed to verify compliance with this Supplier Code upon reasonable request. Suppliers should ensure right of access by Future Metals employees, customers, auditors and regulatory authorities to the applicable areas of facilities and documents, at any level of the supply chain. If applicable and as required by the business, Future Metals may conduct onsite audits and inspections of operations and facilities, review and approve corrective actions plans, verify implementation of corrective action or take other action deemed reasonably necessary in the circumstances.

Security

Suppliers must conduct their business in a secure manner, including implementing reasonable measures for minimizing Future Metals' exposure to security threats such as crime and information technology breach. When visiting or working at Future Metals locations, Suppliers must abide by Future Metals' security procedures and report any security concerns to the appropriate Future Metals personnel.

Training and Competency

Suppliers are expected to communicate and enforce the principles of this Supplier Code to their supervisors, employees, and suppliers. This includes establishing appropriate training measures to allow managers and employees to gain an appropriate level of knowledge and understanding of this Supplier Code, the applicable laws and regulations, and generally recognized standards.

Continuous Improvement

Suppliers are expected to continuously improve their performance by implementing appropriate control updates and enhancements including ways to measure performance with the various requirements set out in this Supplier Code.

6. SPEAKING UP & REPORTING CONCERNS

No matter your location or role, when you are working for or on behalf of Future Metals you are expected to conduct yourself according to this Supplier Code and to speak up if you see something that goes against the requirements set out within. We encourage you to raise any concerns via the Future Metals stakeholder reporting channels at <http://www.futuremetals.com/contact-us/> or via email: commdept@marmon.com. Reports of non-compliance or any related concerns may also be made to your Future Metals business representative. All such reports will be treated confidentially and communicated on a need-to-know basis only. We have a zero-tolerance approach to retaliation against anyone for reporting a concern in good faith.

We thank you for your cooperation and commitment to knowing and following this Supplier Code at all times.