

# CODE OF ETHICS & CONDUCT

THIS CODE IS  
 APPLICABLE  
 TO ALL  
 MANUFACTURING  
 TEAM MEMBERS:

- ✓ Customers
- ✓ Suppliers
- ✓ Employees



Updated: August 2025



## Introduction Code of Ethics & Conduct

A&B Precision Metals, Inc., is committed to the realization of bold sustainability goals tied to human rights and environmental protection, while ensuring that violations are identified, minimized and ultimately eliminated within our global supply chain. For clarification, Customers, Suppliers and Employees will herein be referred to collectively as ‘Manufacturing Teams.’

This Code of Ethics & Conduct outlines A&B Precision Metals, Inc.’s expectations regarding workplace standards and business practices. We encourage our Manufacturing Team to adhere to and to accept this Code, aligning all entities with our values and ethical requirements.

We have identified that you have not completed the requirement to accept this Code of Ethics & Conduct. We therefore respectfully request that either you, or an authorized representative of your firm review and accept this Code of Ethics & Conduct by completing the attached form and returning it either in person, via email, or by mail as follows:

A&B Precision Metals, Inc.  
Attn: Human Resources  
13715 Mt. Anderson Street  
Reno, NV 89506

Email:  
[Lynn@PrecisionMetals.com](mailto:Lynn@PrecisionMetals.com)

For Customers and Suppliers; please also make your employees aware of our Code of Ethics and Conduct and let us know if you have any questions or concerns.

We thank you for supporting this commitment to responsible business practices, and for embracing ‘working ethically’ as a critical business requirement.

If you have any questions about this process, please submit an email to: [Lynn@PrecisionMetals.com](mailto:Lynn@PrecisionMetals.com)





## A&B Precision Metals, Inc. Code of Ethics & Conduct

This Code sets forth minimum requirements of any person, entity, or business seeking as our Customer, the manufacture of products or services, any Supplier providing A&B Precision Metals, Inc., with goods or services, and/or any employee gainfully employed by A&B Precision Metals, Inc. These requirements are consistent with our values and principles and are applicable to all Customers, Suppliers, Employees and their respective affiliates and subsidiaries globally. For clarification, Customers, Suppliers and Employees will herein be referred to collectively as 'Manufacturing Teams.'

### **Compliance with Laws**

Manufacturing Teams shall at all times operate in full compliance with all applicable laws, rules and regulations (collectively, "Laws").

### **Labor and Human Rights**

Manufacturing Teams:

1. Shall respect human rights and treat all workers with dignity and respect.
2. Shall not participate in human rights violations.
3. Shall only employ or engage workers who meet the applicable minimum legal age requirement assigned to the industry where employed.
4. Shall not use or engage in any indentured or forced labor, slavery, or servitude, human trafficking, or compulsory labor.
5. Shall set working hours, wages, and over-time pay in compliance with all applicable laws.
6. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards.
7. Shall employ worker on the basis of their ability to do the job and treat them with dignity and respect.
8. Shall not engage in or permit corporate punishment or threatened or actual violence.
9. Shall not engage in any discrimination or harassment, whether based on gender, race, color, religion, ethnicity, social background, age, sexual orientation, national origin, disability, political conviction, or any additional legally protected characteristics.
10. Shall respect employees' right to join or not join any lawful organization, including but not limited to trade unions and works councils, and shall comply with all applicable Laws pertaining to freedom of association and collective bargaining.
11. Shall undertake appropriate due diligence to identify human rights risks, supported by systems and processes to minimize the risk of human rights violations occurring and to enable reporting of concerns free of retaliation.
12. Shall carry out business activities in line with the international human rights instruments and applicable human rights Laws including but not limited to the Universal Declaration of Human Rights, and the International Labor Organization declaration on Fundamental Principles and Rights at Work.

### **Health & Safety**

A&B Precision Metals, Inc., is committed to being a leader in safeguarding the health and safety of employees, officers, directors, agents and contractors (Personnel').

1. All Manufacturing Team members shall comply with this Environmental Health & Safety Policy, the Company Safety Policy, the Safety Handbook, and any site-specific safety requirement or protocol while on-site at the A&B Precision Metals, Inc. location or at any A&B Precision Metals, Inc. customer location on behalf of the Company.



2. All Manufacturing Team members shall:
  - a. Take responsibility for the health and safety of all Personnel.
  - b. Ensure a safe work environment and minimize physical and chemical hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures as well as ongoing safety training.
  - c. Provide all workers with appropriate personal protective equipment where hazards cannot be adequately controlled by other means.
  - d. Provide and properly maintain physical guards, interlocks, and barriers where machinery presents a potential injury hazard to workers.
  - e. Minimize the impact of emergency situations through implementation of emergency plans and response procedures.
  - f. Provide training and ensure that all Personnel are properly trained and educated in respect of health and safety matters.

### **Environment and Sustainability**

At A&B Precision Metals, Inc., environmental and sustainability considerations are an integral part of our business practices.

Manufacturing Teams:

1. Shall maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
2. Shall comply with all applicable product stewardship requirements including laws, regulations, restrictions on use, content, or handling of specific chemicals, substances or materials composition.
  - a. Product labeling, recycling, takeback/end-of-life, and disposal,
  - b. Product design for safety, energy efficiency, and recyclability, or similar life-cycle requirements including the carbon content of products,
  - c. Product packaging and transportation (collectively and as amended “Product Stewardship Requirements”). Evidence of Product Stewardship Requirements shall be provided upon request.
3. Shall provide A&B Precision Metals, Inc. with information upon request for demonstrating Product Stewardship Requirements, including but not limited to Material Declarations as applicable.
4. Shall cooperate with A&B Precision Metals, Inc. in evaluating environmental impacts of products in line with international or domestic standards upon request.
5. Shall minimize environmental pollution and make continuous improvements to reduce or eliminate solid waste, water and air emissions by implementing appropriate conservation measures in each production, maintenance and facility process.
6. Shall manage, control, treat and/or dispose of non-hazardous solid waste, wastewater, and/or air emissions generated from operations as required by applicable laws, before discharge.

### **Integrity, Ethics and Compliance**

All Manufacturing Teams shall commit to the highest standards of ethical conduct when dealing with its Personnel, suppliers, customers and other relevant stakeholders.

Manufacturing Teams:

1. Shall accurately record and disclose information regarding its business activities, structure, financial situation, and performance in accordance with applicable laws as well as prevailing industry business practices.
2. Shall prohibit any and all forms of fraud, extortion, theft, money laundering, or embezzlement by any Personnel.
3. Shall respect intellectual property rights and safeguard A&B Precision Metals, Inc. information. Transfer of technology and know-how shall be done in a manner that safeguards confidential information and intellectual property rights, both of which are valuable business assets.
4. Shall use current and emerging technology responsibly. Shall handle data with the utmost care, ensuring transparency, privacy, and security. Will not expose confidential information in technologies, applications, or programs that are not authorized by A&B Precision Metals, Inc. or that increase the risk that such confidential information will be divulged. Shall perform proper testing, monitoring and verification of any AI-based products or services to ensure security, quality and accuracy.

5. Shall implement processes and procedures and exercise due diligence to detect and avoid counterfeit parts.
6. Shall conduct business in accordance with all applicable competition and anti-trust laws and regulations. Shall not enter formal or informal anti-competitive arrangements or practices that improperly restrict competition.
7. Shall avoid conflicts of interest or mitigate appropriately if any such conflicts arise.

### **Anti-Corruption**

A&B Precision Metals, Inc. is committed to complying with all anti-corruption laws that prohibit bribes, kickbacks, or other corrupt actions to obtain or retain business or obtain any improper advantage.

#### *Bribes or Kickbacks:*

Manufacturing Teams shall not directly or indirectly solicit, receive, or offer any form of bribe, kickback, or other corrupt payment, to or from, any person or organization, including but not limited to government agencies or officials, companies or personnel of those companies.

#### *Gifts and Entertainment:*

When doing business with, or conducting business on behalf of A&B Precision Metals, Inc., Manufacturing Teams may, for legitimate business purposes:

- a. Offer gifts or entertainment to suppliers, customers, or other business associates, or
- b. Accept gifts or entertainment offered by suppliers, customers, or other business associates;
- c. Provided, however, that in each instance the gift or entertainment is:
  - i. Unsolicited
  - ii. No illegal or in violation of this Code
  - iii. Is not a bribe, kickback, or other illicit payment
  - iv. Is not given in exchange for any consideration
  - v. Would not embarrass A&B Precision Metals, Inc. if disclosed publicly
  - vi. Does not create the appearance (actual or implied obligation) that the gift giver is entitled to preferential treatment, an award of business, better prices, or improved terms of sale.

### **Trade Controls, Sanctions, and Embargo Compliance**

All Manufacturing Teams shall comply with all applicable trade controls, sanctions, and embargos when importing or exporting, or transferring goods or technology, and shall obtain all necessary authorizations, permits, or licenses to ensure timely and compliant transportation and delivery. All Manufacturing Teams shall have appropriate trade compliance procedures in place that include effective management of controlled goods or technologies and screening of third.

### **Responsible Sourcing and Conflict Minerals**

A&B Precision Metals, Inc. is dedicated to ensuring that the products it sells do not incorporate “conflict minerals” (minerals which are smelted into tin, tantalum, and gold) sources from entities which directly or indirectly finance conflict in the Democratic Republic of the Congo or adjoining countries.

All Manufacturing Teams shall:

- a. Perform sufficient due diligence into supply chains to determine whether products sold or provided contain tin, tantalum, or gold, and if so, whether and to what extent those metals are sources from conflict-free smelters;
- b. Report on the results of such due diligence to enable A&B Precision Metals, Inc. to comply with its legal obligations and policy goals, and;
- c. Commit to being or becoming “conflict-free” so that any such metals are sourced only from conflict-free smelters.

### **Compliance Monitoring**

All Manufacturing Teams shall allow A&B Precision Metals, Inc., and/or any of its representatives or agents access to facilities and all relevant records associated with the products and services provided to A&B Precision Metals, Inc., including the establishment of a mutually agreeable date and time for access. However, risks to A&B Precision Metals, Inc.'s business may require immediate access to the products, services and associated records, which must be accommodated as reasonably required access. This section also includes required cooperation with A&B Precision Metals, Inc. to investigate any allegations of wrongdoing, misconduct or corruption.

### **Application**

All Manufacturing Teams shall conform to standards of conduct equivalent to the provisions of this Code. A&B Precision Metals, Inc. reserves the right to audit for compliance with this Code.

### **Breach**

All Manufacturing Teams are responsible for promptly reporting to A&B Precision Metals, Inc. any known breach of this Code and to implement a corrective action plan to cure all non-compliance within a specified time period (furnished to A&B Precision Metals, Inc. in writing). A&B Precision Metals, Inc. reserves the right to terminate the business relationship, including but not limited to suspending placement of future orders and potentially terminating current production, in addition to holding the parties responsible for reasonable costs of investigating non-compliance.

### **Reporting Process**

All Manufacturing Teams shall implement processes to ensure that personnel are able to raise concerns and report grievances, including concerns related to non-compliance with applicable laws, ethical or criminal, or human rights violations, or other suspected wrongdoings or misconduct. And, where law mandates, that personnel who report a concern or grievance in good faith or who assist in an investigation, are protected from retaliation.

A&B Precision Metals, Inc. provides a confidential email help line for all Manufacturing Teams and their personnel if they wish to speak up, seek guidance, or report concerns related to this Code of Conduct at:

[jobs@precisionmetals.com](mailto:jobs@precisionmetals.com)

# A&B Precision Metals, Inc. Code of Ethics & Conduct

## **ACKNOWLEDGEMENT & COMPLIANCE**

Your authorized signature affixed to this document will acknowledge and state as a member of the Manufacturing Team associated with A&B Precision Metals, Inc. that you will support, sustain, and will uphold compliance with this Code of Ethics and Conduct dated May 2025.

|   |                 |                 |                 |  |  |  |  |
|---|-----------------|-----------------|-----------------|--|--|--|--|
| <p><b>MANUFACTURING TEAM ENTITY INFORMATION:</b></p> <p><b>Check One:</b></p> <table style="width: 100%; text-align: center; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; padding: 2px;"><b>SUPPLIER</b></td> <td style="border: 1px solid black; padding: 2px;"><b>CUSTOMER</b></td> <td style="border: 1px solid black; padding: 2px;"><b>EMPLOYEE</b></td> </tr> <tr> <td style="border: 1px solid black; height: 20px;"></td> <td style="border: 1px solid black; height: 20px;"></td> <td style="border: 1px solid black; height: 20px;"></td> </tr> </table> <hr/> <p>Name (Company or Individual)</p> <hr/> <p>Address</p> <hr/> <p>Phone</p> <hr/> <p>Representative Name</p> <hr/> <p>Representative Title</p> <hr/> <p>Representative Signature</p> <hr/> <p>Date Signed</p> | <b>SUPPLIER</b> | <b>CUSTOMER</b> | <b>EMPLOYEE</b> |  |  |  | <p><b>A&amp;B PRECISION METALS, INC. INFORMATION:</b></p> <hr/> <p><b>A&amp;B PRECISION METALS, INC.</b></p> <hr/> <p>Name (Company or Individual)</p> <hr/> <p><b>13715 MT. ANDERSON ST. RENO NV 89506</b></p> <hr/> <p>Address</p> <hr/> <p><b>775-323-2546</b></p> <hr/> <p>Phone</p> <hr/> <p><b>LYNN ARNETT,                    EXEC. DIRECTOR - OR,</b><br/> <b>MICHAEL LAIRD                EXEC. V.P. OPERATIONS - OR,</b><br/> <b>LEVI ARNETT                    EXEC. PRODUCTION MANAGER</b></p> <hr/> <p>Representative Name</p> <hr/> <p><b>EXECUTIVE MANAGEMENT TEAM</b></p> <hr/> <p>Representative Title</p> <hr/> <p>Representative Signature (only one required)</p> <hr/> <p>Date Signed</p> |
| <b>SUPPLIER</b>   | <b>CUSTOMER</b> | <b>EMPLOYEE</b> |                 |  |  |  |  |
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