



## CODE OF BUSINESS CONDUCT AND ETHICS

### I. Introduction

This code sets forth the standards of business conduct for all officers, employees, agents and representatives (collectively, “employees”) and members of the Board of Directors (each, a “director”) of Warrior Met Coal, Inc. and its subsidiaries (collectively, the “Company”, “we” or “our”). All Company employees, officers and directors must read and use this code of conduct to ensure that each business decision follows the Company’s commitment to the highest ethical standards and the law. Adherence to this code and to other Company policies is essential to maintaining and furthering the Company’s reputation for fair and ethical practices among customers, shareholders, employees and communities.

It is the responsibility of every employee, officer and director to comply with all applicable laws and regulations, all provisions of this code and all related Company policies and procedures. We must report any violations of the law or this code per the guidelines set forth herein. Any failure to report such violations or any failure to follow the provisions of this code may have serious legal consequences and may result in discipline, up to and including termination of your employment.

This code summarizes certain laws and the ethical policies that apply to all employees, officers and directors. Several provisions in this code refer to more detailed policies that either (1) concern more complex company policies or legal provisions or (2) apply to select groups of individuals within our Company. If these detailed policies are applicable to you, it is important that you read, understand and be able to comply with them. If you have questions as to whether any detailed policies apply to you, contact your immediate supervisor or a member of our legal department.

Situations that involve ethics, values and violations of certain laws are often very complex. No single code of conduct can cover every business situation that you will encounter. Consequently, this code contains compliance procedures outlined in the sections of this code entitled “*Administration of the Code*” and “*Asking for Help and Reporting Concerns*” that are designed to assist you when you have questions. The thrust of our procedures is **when in doubt, ask**. If you do not understand a provision of this code, are confused as to what actions you should take in a given situation or wish to report a violation of the law or this code, you should follow these compliance procedures. There are few situations that cannot be resolved if you discuss them with the appropriate individuals in an open and honest manner.

After reading this code, you should:

- Have a thorough knowledge of the code’s terms and provisions.
- Be able to recognize situations that present legal or ethical dilemmas.
- Be able to deal effectively with questionable situations in conformity with this code.
- Understand how the provisions of this code apply to your job and consider how you might handle situations to avoid illegal, improper or unethical actions.

When you are faced with a situation and you are not clear as to what action you should take, ask yourself the following questions:

- Is the action legal?
- Does the action comply with this code?
- How will your decision affect others, including our customers, shareholders, employees and the community?
- How will your decision look to others? If your action is legal but can result in the appearance of wrongdoing, consider taking alternative steps.
- How would you feel if your decision were made public? Could the decision be honestly explained and defended?
- Have you contacted the appropriate individual or individuals regarding the action?

To reiterate, when in doubt, ask.

## **II. Administration of the Code**

### **A. Distribution**

All of our directors, officers and employees will receive a copy of this code when they join our Company. Updates of the code will be distributed to all directors, officers and employees.

### **B. Role of Supervisors and Officers**

Supervisors and officers have important roles under this code and are expected to demonstrate their personal commitment to this code by fostering a workplace environment that promotes compliance with the code and by ensuring that employees under their supervision participate in our Company's compliance training programs.

### **C. Reporting Violations**

All employees are obligated to report violations of this code or the law as soon as possible and to cooperate in any investigations into such violations. We prefer that you give your identity when reporting violations to allow the Company to contact you in the event further information is needed to pursue an investigation. Your identity will be maintained in confidence to the extent practicable under the circumstances and consistent with enforcing this code.

You may also report your concerns, complaints or violations anonymously by calling the Company's hotline at **1-800-916-7037**. You will be prompted to enter the Company identifier. Please enter: **422**.

### **D. Investigations**

The Company will initiate a prompt investigation following any credible indication that a breach of law or this code may have occurred and will initiate appropriate corrective action based on the results of the investigation. Appropriate corrective action may include notifying any appropriate authorities.

## **E. Disciplinary Action**

If you violate any provision of this code, you may be subject to disciplinary action, up to and including discharge. Be aware that if your violation results in monetary loss to the Company, the Company may pursue civil remedies requiring you to reimburse the Company for any loss. If you are involved in a violation, the fact that you reported the violation, together with the degree of cooperation displayed by you, and whether the violation is intentional or unintentional, will be given consideration in any investigation and any resulting disciplinary action which may include termination of your employment.

## **F. No Retaliation**

The Company will not retaliate against anyone who, in good faith, reports a possible violation of law or this code, nor will the Company tolerate any harassment or intimidation of any employee who reports a suspected violation. In addition, there are federal “whistleblower” laws that are designed to protect employees from discrimination or harassment for providing information to employers or governmental authorities, under certain circumstances, with respect to certain laws such as those governing workplace safety, the environment, securities fraud and federal law relating to fraud against shareholders.

## **G. Approvals**

Approvals required under this code should be documented.

## **H. Waivers**

Any request for a waiver of this code must be submitted in writing to our Senior Vice President - Legal who has the authority to decide whether to grant a waiver. However, a waiver of any provision of this code for a director or an executive officer must be approved by the Company’s Board of Directors or its designated committee and will be promptly disclosed to the extent required by law or regulation.

## **I. Certifications**

All new employees must sign a certificate, electronic or otherwise, confirming that they have read and understand this code. However, failure to read the code or sign a confirmation certificate does not excuse you from complying with this code.

### **III. Asking for Help and Reporting Concerns**

The Company takes this code seriously and considers its enforcement to be among its highest priorities, but also acknowledges that it is sometimes difficult to know right from wrong. That’s why this code encourages open communication. Always remember, **when in doubt, ask**. Whenever you have a question or concern, are unsure about what the appropriate course of action is or if you believe that a violation of the law or this code has occurred:

- You should talk with your immediate supervisor. He or she may have the information you need or may be able to refer the matter to an appropriate source.
- If you are uncomfortable talking with your immediate supervisor, you may also contact any manager in our Company with whom you feel comfortable, any member of the Company’s Human Resources Department or a member of our Legal Department.
- In addition, if you have concerns or complaints about accounting or audit matters or our internal accounting controls, you may confer with your immediate supervisor or our Chief Financial

Officer. You may also submit your concern or complaint, on an anonymous basis, to the Audit Committee of our Board by calling the toll-free number **1-800-916-7037**. You will be prompted to enter the Company identifier. Please enter: **422**.

You can reach the Company's Chief Financial Officer, Chief Administrative Officer or Senior Vice President - Legal by calling the Company's main number and requesting to speak with the appropriate officer. The number is: **205-554-6150**.

#### **IV. Fair Dealing**

The Company has built a reputation as a trustworthy and ethical member of the community and the coal industry. We must always conduct our business with high standards in order to maintain our reputation for fair and honest dealings and must remain committed to maintaining the highest levels of integrity and fairness when dealing with others. When we fail to negotiate, perform or market in good faith, we may seriously damage our reputation and lose the loyalty of our customers or other stakeholders. You must conduct business honestly and fairly and not take unfair advantage of anyone through any misrepresentation of material facts, manipulation, concealment, abuse of privileged information, fraud or other unfair business practice.

#### **V. Compliance with the Laws and Company Policy**

First and foremost, all employees, officers and directors must behave in an ethical manner and comply with all laws, rules and government regulations that apply to our business. Although we address several important legal topics in this code, we cannot anticipate every possible situation or cover every topic in detail. The Company has adopted other policies, such as the *Anti-Bribery, Anti-Corruption and Sanctions Compliance Policy*, the *Gifts, Meals, Entertainment and Travel Policy* and the *Policy Prohibiting Insider Trading and Unauthorized Disclosure of Information to Others*, which provide a more detailed explanation of the Company's position on various topics. It is your responsibility to know and follow the law as it pertains to your position and duties and to conduct yourself in an ethical manner. It is also your responsibility to report any violations of the law or this code. You may report such violations by following the compliance procedures set forth herein.

##### **A. Bribery**

Bribery occurs when anything of value is provided, or promised to be provided, directly or indirectly to individuals to influence a discretionary decision. These individuals may include, but are not limited to, business partners, clients, vendors, suppliers, and government officials. A bribe does not necessarily need to be of large value and can take many forms, including: money, gift cards, or any offer of something of value. Neither gifts nor anything else of value should ever be given with the intent to influence or appear to influence decisions made by any person. Bribes or other improper payments are strictly prohibited.

Please review the Company's *Anti-Bribery, Anti-Corruption and Sanctions Compliance Policy* for a more detailed discussion related to the Company's policy on bribery and other forms of corruption.

##### **B. Business Courtesies - Gifts and Entertainment**

We are dedicated to treating fairly and impartially all persons and firms with whom we do business. Therefore, our employees must not give or receive gifts, entertainment or gratuities that could influence, or be perceived to influence, business decisions. Misunderstandings can usually be avoided by conduct that makes clear that our Company conducts business on an ethical basis and will not seek or grant special considerations.

Please review the Company's *Gifts, Meals, Entertainment and Travel Policy* for a more detailed discussion related to the Company's policy on business courtesies.

### **C. Gifts and Entertainment involving Governmental Officials**

Special rules apply when interacting with government officials as defined in the Company's *Anti-Bribery, Anti-Corruption and Sanctions Compliance Policy*. In many circumstances, there are also restrictions on dealing with family members of a government official or employee.

Providing or offering gifts and entertainment to government officials creates special risks and may be prohibited by law. Before any gift is offered or provided to a government official, you must receive prior approval from the Company's Compliance Officer and a member of the Company's Executive Management Team.

Please review the Company's *Gifts, Meals, Entertainment and Travel Policy* for a more detailed discussion related to the Company's policy on dealing with governmental officials.

### **D. Antitrust Laws**

Our Company is successful in competitive and open markets and this success is built on excellence in all areas of our business. Antitrust laws are designed to ensure a fair and competitive marketplace by prohibiting various types of anticompetitive behavior. Some of the most serious antitrust offenses occur between competitors, such as agreements to fix prices or to divide customers, territories or markets. Accordingly, it is important to avoid discussions with our competitors regarding pricing, terms and conditions, costs, marketing plans, customers and any other proprietary or confidential information. Foreign countries often have their own body of antitrust laws, so the Company may also be subject to antitrust laws of foreign countries.

It is important to understand that even unwritten agreements may violate anti-trust laws. They can be based on informal discussions or the mere exchange of information with a competitor. If you believe that a conversation with a competitor enters an inappropriate area, end the conversation at once. Also, membership in trade associations is permissible only if approved in advance by our Senior Vice President - Legal.

If you have questions about the application of antitrust laws, you should consult with our Company's Legal Department, and any agreements with possible antitrust implications should be made only with the prior approval of the Senior Vice President - Legal.

### **E. Import-Export Laws and Antiboycott Laws**

Our Company is committed to complying fully with all applicable U.S. laws governing imports and exports. These laws contain limitations on the types of products that may be imported into the United States and the manner of importation. They also prohibit exports to, and most other transactions with, certain countries as well as cooperation with or participation in foreign boycotts of countries that are not boycotted by the United States.

*Again, this discussion is not comprehensive, and you are expected to familiarize yourself with all laws and regulations relevant to your position with us, as well as all our related written policies on these laws and regulations. To this end, our Senior Vice President - Legal, or other members or our Legal Department are available to answer your calls and questions. If you have any questions concerning any possible reporting or compliance obligations, or with respect to your own duties under the law, you should not hesitate to call and seek guidance from our Legal Department.*

## **VI. Conflicts of Interest**

All of us must be able to perform our duties and exercise judgment on behalf of the Company without influence or impairment, or the appearance of influence or impairment, due to any activity, interest or relationship that arises outside of work. Put more simply, when our loyalty to our Company is affected by actual or potential benefit or influence from an outside source, a conflict of interest exists. We should all be aware of any potential influences that impact or appear to impact our loyalty to the Company. In general, you should avoid situations where your personal interest conflicts, or appears to conflict, with those of the Company.

Any time you believe a conflict of interest may exist, you must disclose the potential conflict of interest to your immediate supervisor or our Senior Vice President - Legal. Any activity that is approved, despite the actual or apparent conflict, must be documented. A potential conflict of interest that involves an executive officer must be approved by our Board of Directors (the "Board") or its designated committee. A potential conflict of interest involving an officer with the title of Vice President and above must be approved by our Senior Vice President - Legal.

It is not possible to describe every conflict of interest, but some situations that could cause a conflict of interest include:

- Doing business with family members
- Having a financial interest in another company with whom we do business
- Taking a second job
- Managing your own business
- Serving as a director of another business
- Being a leader in some organizations
- Diverting a business opportunity from the Company to another company

### **A. Doing Business with Family Members**

A conflict of interest may arise if family members work for a supplier, customer or other third-party with whom we do business. It also may be a conflict if a family member has a significant financial interest in a supplier, customer or other third party with whom we do business. A "significant financial interest" is defined below. Before doing business on our behalf with an organization in which a family member works or has a significant financial interest, an employee must disclose the situation to his or her immediate supervisor or our Senior Vice President - Legal and discuss it with them. Document the approval if it is granted. If the only interest you have in a customer or supplier is because a family member works there, then you do not need to disclose the relationship or obtain prior approval unless you deal with the customer or supplier.

"Family members" include your:

- Spouse
- Children
- Parents
- Brothers and Sisters

- In-Laws
- Life Partner

Employing relatives or close friends who report directly to you may also be a conflict of interest. Although our Company encourages employees to refer candidates for job openings, employees who may influence a hiring decision must avoid giving an unfair advantage to anyone with whom they have a personal relationship. In particular, employees may not be supervised by their immediate relatives. Unless otherwise approved by our Human Resources Department, there must be two levels of reporting between supervisors and employees who are immediate relatives. Supervisors should not hire relatives or attempt to influence any decisions about the employment or advancement of people related to or otherwise close to them, unless they have received approval from our Human Resources Department.

## **B. Ownership in Other Businesses**

Our investments can cause a conflict of interest. In general, you should not own, directly or indirectly, a significant financial interest in any company that does business with us or seeks to do business with us. You also should not own a significant financial interest in any of our competitors.

Two tests determine if a “significant financial interest” exists:

- You or a family member owns more than 5% of the outstanding stock of a business or you or a family member has or shares discretionary authority with respect to the decisions made by that business, or
- The investment represents more than 5% of your total assets or of your family member’s total assets.

If you or a family member has a significant financial interest in a company with whom we do business or propose to do business, that interest must be approved by our Senior Vice President - Legal prior to the execution of any transaction.

Notwithstanding the foregoing, non-employee directors of our Company and their family members may have significant financial interests in or be affiliates of suppliers, customers, competitors and third-parties with whom we do business or propose to do business. However, a director must:

- disclose any such relationship promptly after the director becomes aware of it,
- remove himself or herself from any Board activity that directly impacts the relationship between our Company and any such company with respect to which the director has a significant financial interest or is an affiliate, and
- obtain prior approval of the Board or its designated committee for any transaction of which the director is aware between our Company and any such company.

## **C. Outside Employment**

Sometimes our employees desire to take additional part-time jobs or do other work after hours, such as consulting or other fee-earning services. This kind of work does not, in and of itself, violate this code. However, the second job must be strictly separated from your job with the Company and must not interfere with your ability to devote the time and effort needed to fulfill your duties. You cannot engage in any outside activity that causes competition with the Company or provides assistance to the Company’s competitors or other parties (such as

suppliers) with whom we regularly do business. You should avoid outside activities that embarrass or discredit the Company. Outside work may never be done on company time and must not involve the use of Company supplies or equipment. Additionally, you should not attempt to sell services or products from your second job to the Company.

Before engaging in a second line of work, you should disclose your plans to your immediate supervisor to confirm that the proposed activity is not contrary to the Company's best interests.

#### **D. Service on Boards**

Serving as a director of another corporation may create a conflict of interest. Being a director or serving on a standing committee of some organizations, including government agencies, also may create a conflict.

Before accepting an appointment to the board or a committee of any organization whose interests may conflict with the Company's interests, you must discuss it with the Chief Executive Officer, Chief Administrative Officer or Senior Vice President - Legal and obtain their approval. This rule does not apply to non-employee directors of the Company.

#### **E. Business Opportunities**

Without the written consent of the Company's Board of Directors, employees are prohibited from taking for themselves an opportunity that is (1) a potential transaction or matter that may be an investment or business opportunity or prospective economic or competitive advantage in which the Company could reasonably have an interest or expectancy, or (2) discovered through the use of corporate property or information. In addition, employees are prohibited from using corporate property or information for personal gain and competing with the Company directly or indirectly. Employees owe a primary duty to the Company to advance its legitimate interest when the opportunity to do so arises.

### **VII. Securities Laws and Insider Trading**

Both the Company and U.S. Federal securities law prohibit the buying or selling of Company stock or other publicly-traded securities at a time when you are aware of material information that is not publicly known. This information is known as material non-public information and it includes any information concerning the Company that is not available to the general public and which an investor would likely consider to be important in making a decision whether to buy, sell or hold stock or other securities. The improper use of material non-public information is known as insider trading. Insider trading is a criminal offense and is strictly prohibited.

A good rule of thumb to determine whether information about the Company is material is whether or not the release of that information to the public would have an effect on the price of our stock. Material non-public information is no longer deemed "inside" information once it is publicly disclosed and the market has had sufficient time to absorb the information. For purposes of this policy, information will generally be considered public after the second full trading day following the Company's public release of the information. For example, if the Company publicly disclosed information on a Tuesday, the first day that trading could occur would be Friday.

In addition to being prohibited from buying or selling our stock or other publicly-traded securities when you are in possession of material non-public information, you are also prohibited from disclosing such information to anyone else (including friends and family members) in order to enable them to trade on the information. In addition, if you acquire material non-public information about another company due to your relationship with the Company, you may not buy or sell that other company's stock or other securities until such information is publicly disclosed and sufficiently disseminated into the marketplace.



The following are general guidelines to help you comply with the insider trading policy:

- Do not share material non-public information with Company personnel whose jobs do not require them to have the information.
- Do not disclose any non-public information, material or otherwise, concerning the Company to anyone outside the Company unless required as part of your duties and the person receiving the information has a reason to know the information for company business purposes.
- If you have material non-public information regarding the Company, or regarding any other publicly traded company that you obtained from your employment or relationship with the Company, you must not buy or sell, or advise anyone else to buy or sell, Company securities or that other company's securities, until such information is publicly disclosed and sufficiently disseminated into the marketplace.

Penalties for trading on or communicating material non-public information are severe. If you are found guilty of an insider trading violation, you can be subject to civil and even criminal liability. In addition to being illegal, insider trading is unethical and a violation of this code. Any violation of our insider trading policies will result in disciplinary action, which may include the termination of your employment. In addition, the Company may report any violations of this policy to the appropriate regulators and authorities.

For more information about our policies concerning the securities laws, you should refer to our more detailed *Policy Prohibiting Insider Trading and Unauthorized Disclosure of Information to Others*. This policy is available from our Legal Department. If you have any questions concerning the securities laws or about our policies with regard to those laws, or regarding the correct ethical and legal action to take in a situation involving material non-public information, please contact your immediate supervisor or our Senior Vice President - Legal.

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

The Company is committed to providing the media with accurate, timely, and comprehensive information. Some information the Company provides is subject to laws that govern the timing of our disclosures to the public and others. In order to avoid discrepancies, the inadvertent disclosure of confidential information or violations of the law, only certain designated employees who have been authorized by the Executive Department may discuss the Company with the news media, securities analysts and investors. This media policy applies to all Company employees and is intended to cover all external news media including broadcast, electronic and print.

The Company understands that some employees may use various forms of social media. Use of Social Media sites should be limited to an employee's personal time and must not interfere with any employee responsibilities. Employees are not authorized to make any representations on behalf of the Company or purport to or imply that they are acting for or on behalf of the Company when participating in social media unless specifically authorized to do so by the Executive Department. Postings may not include company logos or trademarks. Postings may not include any confidential or proprietary information about the Company or its securities.

Failure to comply with any portion of this policy dealing with media relations may result in disciplinary action, up to and including discharge.

If you are contacted by a member of the media, or have additional questions, please review the Company's *Media Relations Policy*.

#### **IX. Political Activity and Lobbying**

As noted in other sections of this code, the Company pursues a professional and ethical approach to working with government officials regarding issues that may affect the Company. Only authorized persons may interact with government officials on behalf of the Company, and they must comply with all applicable laws, regulations and policies.

#### **A. Political Contributions**

The use of corporate funds or resources for political contributions are regulated by federal, state and local laws, and may be prohibited or restricted depending on the circumstances. Our funds and resources may not be used for contributions of any kind to any political party or committee, or to any candidate or holder of any government position (national, state or local) unless such contribution is permitted by law and complies with our company policy. Please contact our Vice President - External Affairs to determine whether a specific company contribution may be permitted.

You are free engage in the political process and support the political candidates and parties of your choice; however, you must do so using your own resources outside of normal office hours. You may not use company funds or resources for personal political activities, and it is against our policy to reimburse an employee for any political contributions or expenditures. If you decide to engage in personal political activity, you must not suggest or imply that you are acting on behalf of the Company. In addition, political contributions may not violate the Company's *Anti-Bribery, Anti-Corruption and Sanctions Compliance Policy*.

#### **B. Lobbying**

Lobbying activities may require registration and/or reporting and may be subject to other restrictions and prohibitions. The term "lobbying" covers many kinds of activity and may include the following:

- Contacting and communicating with federal, state or local government officials or employees;
- Attempting to influence legislative or administrative action;
- Attempting to influence a governmental contract or grant; and
- Providing gifts or entertainment to federal, state or local government officials or employees.

Before engaging in any type of lobbying activity on behalf of the Company, you must first consult with our Vice President - External Affairs.

#### **X. Safeguarding Corporate Assets and Data Privacy**

We have a responsibility to protect company assets entrusted to us from loss, theft, misuse and waste. Company assets and funds may be used only for business purposes and may never be used for illegal purposes. If you have access to the Company's financial assets, like cash or credit cards, use them carefully and only: (1) for business purposes; (2) when authorized; and, (3) in accordance with the Company's applicable guidelines and the law. Company assets, such as telephones, fax machines, copy machines, personal computers, e-mail and similar equipment, may be used for incidental personal use if the use is occasional, there is no significant added cost to the Company, it does not interfere with your work responsibilities and is not related to an illegal activity or outside business. Likewise these assets should be protected from theft, viruses, hackers, and any other unauthorized access. In compliance with the Company's *Information Technology Policy*, you should never install unauthorized software, applications, hardware, or storage devices without the approval of the Company's IT Department.

It is also important that you protect the confidentiality of company information. Confidential or proprietary information includes all information that is not generally known to the public and is helpful to the Company or would be helpful to competitors if the information was in their possession. Proprietary information should be marked accordingly, kept secure and access should be limited to those who have a need to know in order to do their jobs.

We also have a responsibility to protect the personal data of our employees from public disclosure. Personal data broadly refers to any information about an identified or identifiable individual that can be used to identify, locate or contact a natural person. This may include information such as a date of birth, a social security number, health records, or a telephone number. Personal data should not be shared with anyone who does not have a legitimate business reason to know or shared or sold to third-parties. Also, if you are using any form of artificial intelligence (“AI”), you must follow the Company’s *Information Technology Policy*. Confidential or personal information should never be uploaded into an unauthorized AI tool for any reason. Finally, always be sure to store personal data in a secure location to protect it from loss, theft, or any other unauthorized access.

Our business relations are built on trust, and our customers and suppliers count on that trust. If you learn information from them that is not otherwise public, you should keep that information confidential also.

If you become aware of theft, waste, misuse of Company assets or funds, or data privacy issues or have any questions about your proper use of them, you must report it to your immediate supervisor or as set forth in the section *Asking for Help and Reporting Concerns*.

## **XI. Equal Employment Opportunity and Anti-Harassment**

We are committed to providing equal employment opportunities for all employees and will not tolerate any speech or conduct that is intended to, or has the effect of, discriminating against or harassing any qualified applicant or employee because of his or her race, color, religion, sex (including pregnancy, childbirth or related medical conditions), gender, national origin, sexual orientation, age, physical or mental disability, veteran status or any characteristic protected by law. We will not tolerate discrimination or harassment by anyone - managers, supervisors, co-workers, vendors or our customers. This policy extends to every phase of the employment process, including: recruiting, hiring, training, promotion, compensation, benefits, transfers, discipline and termination, layoffs, recalls, and company-sponsored educational, social and recreational programs, as applicable. If you observe conduct that you believe is discriminatory or harassing, or if you feel you have been the victim of discrimination or harassment, you should follow the reporting guidelines set forth in the section *Asking for Help and Reporting Concerns*.

The Company will not retaliate against any employee for filing a good faith complaint or for cooperating in an investigation. Nor will the Company tolerate or permit retaliation by management, employees or co-workers. To the fullest extent possible, the Company will keep complaints and the terms of their resolution confidential. If an investigation confirms harassment or discrimination has occurred, the Company will take corrective action against the offending individual, up to and including the immediate termination of employment.

In the event you are not comfortable reporting an event to your immediate supervisor or a member of the Company’s Human Resources Department, the Company has established a Hotline to report allegations of discrimination and harassment. **The Hotline number is: 1-800-916-7037.** You will be prompted to enter the Company identifier. Please enter: **422**

For more information, including information on proper reporting channels, you should refer to the Company’s *Anti-Harassment and Anti-Discrimination Policy*.

## **XII. Safety, Health and the Environment**

We are committed to providing safe and healthy working conditions by following all occupational health and safety laws governing our activities. Having a safe workplace is one of the most important benefits the Company can offer to its employees. Management and each and every employee have a shared responsibility in the promotion of health and safety in the workplace. The Company has established and is committed to maintaining programs designed to protect the health and safety of our employees. The Company's employees, officers and directors are all obligated to support the Company's commitment to safety laws and regulations and all of the related policies. You should follow all safety laws and regulations, as well as the Company's safety policies and procedures and should immediately report any accident, injury or unsafe equipment, practices or conditions to your immediate supervisor.

You also have an obligation to carry out company activities in ways that preserve and promote a safe and healthy environment. You must strictly comply with the letter and spirit of applicable environmental laws and the public policies they represent.

The consequences of failing to adhere to environmental laws and policies can be serious. Our Company, as well as individuals, may be liable not only for the costs of cleaning up pollution, but also for significant civil and criminal penalties. You should make every effort to prevent violations from occurring and report any violations to your immediate supervisor or our Senior Vice President - Legal. In the event you are not comfortable reporting an event to your immediate supervisor or our Senior Vice President - Legal, the Company has established a Hotline to report violations. **The Hotline number is: 1-800-916-7037.** You will be prompted to enter the Company identifier. Please enter: **422**

## **XIII. Workplace Violence**

The Company has a zero-tolerance policy against any form of violence within the workplace. We will not tolerate workplace violence by anyone, whether that be managers, supervisors, co-workers, vendors, suppliers, or business partners. Workplace violence can include, but is not limited to, physical assaults of any kind, vandalism of Company property, or other forms of harassment listed in the Company's *Anti-Harassment and Anti-Discrimination Policy*. An employee who witnesses or otherwise learns of violence, the threat of violence, or any suspicious workplace activity involving employees or any third party must immediately contact Human Resources. Any employee found committing an act of workplace violence will be subject to disciplinary action, up to and including termination of employment.

## **XIV. Accuracy of Company Records**

All information you record or report on the Company's behalf, whether for company purposes or for third-parties, must be done accurately and honestly. All corporate records (including accounts and financial statements) must be maintained in reasonable and appropriate detail, must be kept in a timely fashion, and must appropriately reflect our transactions. Falsifying records or keeping unrecorded funds and assets is a severe offense and may result in prosecution or loss of employment. When a payment is made, it can only be used for the purpose spelled out in the supporting document.

Information derived from company records is provided to our shareholders and investors as well as government agencies. Thus, corporate accounting records must conform not only to our internal control and disclosure procedures but also to generally accepted accounting principles and other laws and regulations, such as those of the Internal Revenue Service and the Securities and Exchange Commission. The Company's public communications and reports we file with the Securities and Exchange Commission and other government agencies should contain information that is full, fair, accurate, timely and understandable in light of the circumstances surrounding disclosure.

Our internal and external auditing functions help ensure that our financial books, records and accounts are accurate. Therefore, you should provide our accounting department, internal auditing staff, audit committee and independent public accountants with all pertinent information that they may request.

We encourage open lines of communication with our audit committee, accountants and auditors and require that all our personnel cooperate with them to the maximum extent possible. It is unlawful for you to fraudulently influence, induce, coerce, manipulate or mislead our independent public accountants for the purpose of making our financial statements misleading.

If you are unsure about the accounting treatment of a transaction or believe that a transaction has been improperly recorded or you otherwise have a concern or complaint regarding an accounting matter, our internal accounting controls, or an audit matter, you should confer with your immediate supervisor, the Chief Accounting Officer and Controller or our Chief Financial Officer, or you may submit your concern, on an anonymous basis, to the audit committee of our Board by calling the Hotline at **1-800-916-7037**. You will be prompted to enter the Company identifier. Please enter: **422**

#### **XV. Record Retention**

Company records should be retained or discarded in accordance with our record retention policies and all applicable laws and regulations. From time to time we are involved in legal proceedings that may require us to make some of our records available to third parties. Our legal counsel will assist us in releasing appropriate information to third parties and provide you (or your immediate supervisor) with specific instructions. It is a crime to alter, destroy, modify or conceal documentation or other objects that are relevant to a government investigation or otherwise obstruct, influence or impede an official proceeding. The law applies equally to all of our records, including formal reports as well as informal data such as e-mail, expense reports and internal memos. If the existence of a subpoena or a pending government investigation is known or reported to you, you should immediately contact our legal department and you must retain all records that may pertain to the investigation or be responsive to the subpoena.

Adopted: 4/12/2017  
Last Amended: 7/26/2024