



## GIFTS, MEALS, ENTERTAINMENT AND TRAVEL POLICY

### I. What is the Policy and Why Do We Have It?

Warrior Met Coal, Inc. (the “Company”) is committed to doing business ethically, avoiding actual or perceived corruption or conflicts of interest, keeping accurate company books and records, and being a good steward of its resources.

In recognition of the above, the Company requires that all Gifts, Meals, Entertainment and Travel (“GMET”) in connection with Company business, whether given, offered, accepted, or received be:

- Reasonable and appropriate such that it would not embarrass the Company if publicly disclosed;
- Provided or accepted for a valid business purpose;
- Legal where provided and accepted;
- Pre-approved if necessary in connection with this Policy;
- Properly documented in the Company’s books and records; and
- Take the form of goods or services rather than cash or cash equivalents.

This Policy supplements relevant portions of the Company’s *Code of Business Conduct and Ethics*, the *Anti-Bribery, Anti-Corruption and Sanctions Compliance Policy* and the *Business Expense Policy*.

### II. Who Does the Policy Apply to and What Do You Have to Do?

This GMET Policy (the “Policy”) is applicable to all officers, directors and employees of the Company and all consultants, agents, representatives and other third parties when giving, offering, accepting or receiving GMET in connection with Company business. Compliance with this Policy includes:

- Reading and understanding the Policy, and asking questions if needed;
- Not offering, giving, accepting or receiving inappropriate GMET;
- Seeking any required approvals and submitting any required documentation under this Policy;
- Attending any required training about the Policy;
- Being on the lookout for suspicious activities that may violate this Policy;
- Reporting any concerns regarding potential violations; and
- Fully cooperating with the Company, outside legal counsel, outside auditors or other similar parties in any related investigations.

### III. Who Enforces and Administers the Policy?

The Company’s Legal and Compliance Department is responsible for the administration of this Policy under the oversight of the Audit Committee of the Board of Directors. It may create and maintain procedures or direct others to do so as necessary. All questions or concerns regarding this Policy or potential violations may be directed to the Company’s Senior Vice President, Legal/Compliance Officer as listed on the Company’s website and internal resources.

The Company is committed to having a robust, current and workable Policy that is in line with its current risk. Therefore, every year at an established time, the Compliance Officer, or his designee, will review a summary of all complaints or concerns, if any, submitted over the course of the year under this Policy and all investigations, if any that are conducted, as well as any changes in the law so that he may identify

any new or increasing risks and consider areas where additional training or changes to policies or procedures are needed.

#### IV. What GMET is Appropriate versus Inappropriate?

##### A. Always Appropriate

- **Novelty and Promotional Items:** Except where government personnel are involved, you may give and accept reasonable novelty or promotional items (hats, pens, cups, golf shirt, etc.) of a nominal value (under \$100).
- **Occasional, Reasonable Joint Meals/Entertainment:** Except where government personnel are involved, you may offer or accept reasonable meals or entertainment, including tickets to sporting events, under \$250 in value per person in the course of discussing Company business or strengthening Company business relationships or for other legitimate Company business purposes.
  - A representative for each business (giver and receiver) must be present during such meals and entertainment absent approval. Spouses or guests are not typically appropriate unless brought by both sides.
  - Such gifts of meals or entertainment should be occasional rather than routine. For example, an employee should not take the same customer out to a meal every week when there is no new business to discuss. Nor, for example, should an employee accept tickets to attend multiple games, rather than a single game, with a vendor seeking the Company's business.
  - Meals, such as those at a higher end restaurant or those with alcohol, may be reasonable in some circumstances but not in others, regardless of frequency or value. For example, it might be appropriate to take a valued client to a nice dinner with wine during an annual visit to the client's headquarters to discuss the year of business, but it would not be appropriate to accept an expensive lunch with alcohol from a vendor courting the company's business. If you have questions or are confused whether a particular instance is appropriate, you should contact the Compliance Officer.

##### B. Always Inappropriate

- **Soliciting Gifts or Responding to Solicitations:** You should never solicit a gift or favor from those with whom we do business and should report those who ask for such gifts or favors.
- **Cash or Cash Equivalents:** You should never accept, solicit or give gifts of cash or cash equivalents like gift cards, vouchers or loans.
- **Adult Entertainment or Controlled Substances:** You should never give or receive gifts or entertainment involving sexual content or illegal substances, including marijuana and alcohol or tobacco for those underage. This includes adult entertainment experiences, smoking lounges, etc.
- **Illegal or Prohibited by the Business:** You should never give any gift or entertainment that is illegal where given or accepted or known to be prohibited by the other party's organization or home country.
- **During Competitive Bidding:** You should never give or receive gifts or entertainment involving parties to a tender or a competitive bidding process where the Company is bidding.

## V. What GMET Requires Special Approval Before it is Given or Received?

Some GMET poses such a risk of appearing inappropriate or violating a law or rule that it must be preapproved in advance. **Failing to seek preapproval for such GMET will be a violation of this Policy and could result in discipline, up to and including termination of employment or business relationship.** To the extent GMET is paid for with non-Company funds, the Company may also choose not to reimburse any GMET that is not properly preapproved. The following GMET must be preapproved **in writing** by the Company's Compliance Officer and a member of the Company's Executive Management:

- Any offer or receipt of GMET of any value to or from a government official as defined in the Company's *Anti-bribery, Anti-Corruption and Sanctions Compliance Policy*;
- Any offer or receipt of a single promotional item valued in excess of \$100; or
- Any offer or receipt of a meal or entertainment valued at more than \$250 per person or that would result in more than \$500 in value given to or received by a single person within a year.

## VI. Education and Training

The Company will provide this Policy to all employees and third parties acting on its behalf. Employees must certify their receipt of this Policy at onboarding. The Company will also provide risk based training as appropriate. The Company may require employees in sales or procurement whose jobs pose higher risk to certify annually that they have read and understand this Policy and that they are not aware of any facts or circumstances that would indicate a possible violation of this Policy.

## VII. What About Reporting Concerns?

### A. There is a Duty to Report

All employees and third parties acting on behalf of the Company are expected to report any violation or suspected violation of this Policy. Any manager or director who receives a complaint regarding a potential violation of this Policy and fails to transmit that report to the Compliance Officer shall be in violation of this Policy and may be subject to discipline.

### B. How to Report a Concern

Directors, officers, employees and third parties who know of or suspect a violation of this Policy or other illegal or unethical business conduct can report their concerns to their supervisor or Company contact (in the case of third parties) or directly to the Compliance Officer. If anyone does not feel comfortable reporting possible misconduct directly, they may make a report anonymously by using the Company's reporting hotline.

The Hotline number is: **1-800-916-7037**. You will be prompted to enter the Company identifier. Please enter: **422**

### C. Prohibition against Retaliation

The Company strictly prohibits retaliation against anyone for making a good faith report of non-compliance with this Policy (even if such complaint ultimately is found to be unsubstantiated). Similarly, retaliation against anyone for participating in the Company's investigation of a complaint is a violation of this Policy. If an employee feels that he or she has been retaliated against for making or assisting in the investigation of a complaint, he or she should contact the Company's Compliance Officer. Any person who engages in retaliatory conduct in violation of this Policy will be subject to discipline, up to and including termination of employment. Managers are responsible for ensuring that their teams understand this non-retaliation policy and comply with it.

#### **D. Records and Investigation of Complaints**

All complaints will be retained, logged, and addressed or investigated as appropriate. All reporters will be informed that their complaint has been received and addressed.

#### **VIII. What Happens if Someone Violates this Policy?**

A violation of this Policy could result in disciplinary actions including, but not limited to, termination of employment or business relationship with the Company.

Adopted: 7/28/2023  
Last Amended: 7/26/2024