

Global Policy Statement

Version: June 3rd, 2026

Introduction

Hi-Rel Alloys, ULC (“Company”, “we,” “us,” “our”) is committed to conducting business in compliance with applicable laws, regulations, and ethical standards. This Global Policy Statement outlines the principles that guide our operations worldwide and reflects our commitment to integrity, transparency, accountability, and responsible business practices.

Purpose

This policy is intended to guide internal practices, provide transparency, and supplement our contractual terms and conditions to customers, partners, and other stakeholders regarding our approach to compliance and ethical conduct. It does not replace or supersede the terms of any applicable agreement.

Scope

This policy applies to all employees, officers, directors, and third-party partners of Hi-Rel Alloys, ULC across all locations and jurisdictions in which we operate. Everyone acting on behalf of the company is expected to understand and adhere to the principles described in this policy.

When this policy is shared with or referenced by customers, suppliers, or other third parties, it applies only to the extent relevant to the activities performed under the applicable agreement and in a manner consistent with that agreement. Certain provisions apply primarily to internal operations and are included for transparency when this policy is made publicly available.

People and Culture

We are committed to fostering a collaborative, inclusive, and respectful workplace. Our cultural values emphasize ambition, teamwork, and execution, and reflect our belief that engaged and empowered teams drive long-term success. We respect individual rights and customs and strive to maintain a diverse and inclusive workforce.

Where applicable, employees may participate in equity or incentive programs offered by the Company. We also encourage open communication and engagement to support accountability, continuous improvement, and shared success.

Environmental, Social, and Governance (ESG)

We integrate Environmental, Social, and Governance (ESG) considerations into our business practices. We seek to operate sustainably, promote ethical conduct, support our workforce, and comply with applicable laws and regulations. Our approach is designed to support long-term value creation while contributing positively to our communities and stakeholders.

Compliance with Laws and Regulations

We are committed to complying with applicable local, national, and international laws and regulations, including those relating to:

- Anti-corruption and anti-bribery
- Competition and antitrust
- Data privacy and information security
- Labor and employment
- Environmental protection
- Trade controls, export controls, sanctions, and embargoes
- Human rights and modern slavery
- Financial integrity and applicable securities and capital-markets laws

Ethical Business Conduct

We conduct business with integrity, honesty, and fairness. All individuals representing Hi-Rel Alloys, ULC are expected to act ethically in all business dealings. We do not tolerate bribery, corruption, forced labor, human trafficking, or other unethical practices, and we expect our business partners to uphold comparable standards.

Equal Employment Opportunity and Non-Discrimination

We are committed to providing equal employment opportunities and maintaining a workplace free from unlawful discrimination, harassment, and retaliation. Employment decisions, including recruitment, hiring, compensation, promotion, training, development, discipline, and termination are based on qualifications, merit, performance, and legit business needs. We prohibit unlawful discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, veteran status, genetic information, or any other characteristics prohibited by applicable law. We are committed to treating all individuals with dignity, fairness and respect and to complying with applicable employment laws and regulations.

Forced Labor and Human Trafficking

We strictly prohibit the use of forced labor, human trafficking, and any form of modern slavery in our operations and supply chains. All work must be voluntary, and workers must not be coerced, threatened, or restricted through practices such as retention of identity documents or withholding of wages.

We expect suppliers and business partners to take appropriate steps to prevent and address forced labor risks within their operations. Violations of these principles may result in corrective action, up to and including termination of the business relationship.

Anti-Corruption and Anti-Bribery

We prohibit bribery and corruption in any form. No employee or representative may offer, give, solicit, or accept improper payments, gifts, or other benefits intended to influence business decisions. These expectations extend to third parties acting on our behalf.

Competition and Fair Dealing

We are committed to fair competition and compliance with applicable antitrust and competition laws. We do not engage in anti-competitive conduct, price fixing, market allocation, or unfair business practices.

Financial Integrity and Accurate Records

We are committed to maintaining accurate books, records, and financial disclosures in accordance with applicable laws and accounting standards. All transactions must be recorded fairly and transparently, and no false or misleading entries are permitted.

Securities Laws and Insider Trading

As a company preparing for and operating in public markets, we are committed to compliance with applicable securities laws. Material non-public information must be protected, and trading in company securities must be conducted lawfully and ethically.

Conflicts of Interest

Individuals acting on our behalf are expected to avoid situations where personal interests conflict, or appear to conflict, with the interests of the company. Any potential conflicts should be disclosed and managed appropriately.

Trade Controls

We comply with applicable export controls, sanctions, embargoes, and trade restrictions. Transactions are conducted only in accordance with these laws, and we do not knowingly engage with sanctioned parties or restricted destinations.

Safety

We value the safety and health of our workforce and visitors. We comply with applicable workplace safety and health laws and seek to maintain safe working environments through proactive risk identification and prevention efforts.

Data Privacy and Information Protection

Protecting personal data and confidential information is a priority. Personal data is collected, processed, and stored in accordance with applicable data protection laws and information security practices. We expect our partners to maintain appropriate safeguards to protect data entrusted to them.

Supply Chain Security

We are committed to maintaining a secure and resilient supply chain. We align with industry best practices and, where applicable, recognized supply-chain security frameworks to safeguard our operations and partners.

Training and Awareness

We provide compliance training and resources to promote awareness of legal and ethical responsibilities. We may also require certain business partners to participate in compliance-related training or certifications, as appropriate.

Reporting and Whistleblower Protection

We encourage the reporting of concerns or suspected violations of this policy. We provide

reporting channels, including options for confidential or anonymous reporting as permitted by law. Retaliation against individuals who raise concerns in good faith is not tolerated.

Conclusion

We expect all employees and partners to uphold these standards and contribute to a culture of integrity, responsibility, and lawful conduct. This policy is reviewed periodically and may be updated to reflect changes in laws, regulations, or business practices. Unless otherwise agreed in writing, updates to this policy do not amend existing agreements. Violations of this policy will result in appropriate disciplinary or corrective action, consistent with applicable law and contractual arrangements, up to and including termination of employment or business relationships. Where required, we will cooperate with regulatory or law enforcement authorities.

Approved by:



Jason Roth
President ECS