

ABACORP Supplier Integrity Guide

ABACORP strives to perform with integrity in all we do and we expect the same from our suppliers, contractors, agents and consultants (collectively referred to here as “Suppliers”). Suppliers must be likewise committed to lawful, ethical, fair and reasonable practices and must fully comply with applicable legal and regulatory requirements in their business relationships with ABACORP and ABACORP Companies. This guide works hand in hand with the ABACORP Code of Conduct (available at: <https://www.abacorpcnc.com>) and is intended to remind Suppliers of ABACORP’s minimum expectations.

Supplier Responsibilities as an ABACORP Supplier, you will:

Safe and Responsible Workplaces: (i) follow all local health and safety rules, policies and procedures; (ii) provide personal protective equipment to all employees who need it to complete their job; and (iii) comply with applicable environmental laws and regulations.

Work Environments Free from Unlawful Discrimination or Harassment and Violence: (i) respect the human rights of your employees and others in your business operations and your activities for ABACORP; (ii) not employ workers younger than sixteen (16) years of age or below the applicable minimum age, whichever is higher; (iii) prohibit discrimination, harassment and retaliation; and (iv) protect employees from workplace violence or the threat of violence.

Good Citizenship: (i) observe applicable laws and regulations governing wages, hours and working conditions; (ii) not use forced or indentured labor, or workers subject to any form of compulsion or coercion, or engage in or abet trafficking in persons; and (iii) will adopt policies and establish systems to procure tantalum, tin, tungsten and gold from sources that have been verified as conflict free, and to provide supporting data on your supply chain for tantalum, tin, tungsten and gold to ABACORP when requested.

Gifts, Loans, Entertainment and Improper Payments: (i) maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials; (ii) not offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, including offers of employment, or participation in a contest, game or promotion, to any ABACORP employee, representative or ABACORP customer or to any government official in connection with any ABACORP procurement, transaction or business dealing; and (iii) allow ABACORP access to supporting records and internal controls when requested.



Information Security and Data Privacy: (i) respect privacy rights and secure the data of ABACORP employees, customers and suppliers; and (ii) implement and maintain physical, organizational and technical measures to ensure the security and confidentiality of ABACORP data.

Intellectual Property: (i) respect the intellectual and other property rights of ABACORP and of third parties, including all patents, trademarks and copyrights; and (ii) avoid transferring ABACORP technical information to any third party without the express, written permission of ABACORP.

Competition Requirements: (i) avoid sharing or exchanging any price, cost or other competitive information with any third party with respect to any proposed, pending or current ABACORP procurement; and (ii) avoid engaging in any collusive conduct with any third party.

Export and Import Controls: (i) comply with all applicable export and import control laws and regulations when importing, exporting, re-exporting or transferring (in country) goods, services, software, technology or technical data; (ii) screen customers and suppliers to ensure any embargos and economic restrictions are observed; and (iii) provide internally-maintained information about country of origin and commodity classifications to ABACORP when requested.

Fair Accounting Practices: (i) ensure that all invoices or similar documentation submitted to ABACORP or governmental authorities or REPORT ANY CONCERNS As a ABACORP Supplier, you are expected to report any concern related to ABACORP's Code of Conduct and this Guide to ABACORP, as allowed under local laws and any legal restrictions that might apply, as soon as the issue arises.

This is true whether the concern directly involves you as the Supplier. We also ask that you take any steps reasonably necessary to assist ABACORP with our investigation of the issue reported. ABACORP will not tolerate retaliation against any person for reporting a concern involving ABACORP's Code of Conduct or this Guide. Please use the following resources to make that report to:

- Local management at the ABACORP Company involved;