

INTEGRITY GUIDE FOR SUPPLIERS, CONTRACTORS & CONSULTANTS

This guide also applies to Consortium Partners

A Message from Arabelle Solutions

Arabelle Solutions is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with Arabelle Solutions' suppliers, contractors, consortium partners and consultants (collectively "Suppliers"). Arabelle Solutions bases its Supplier relationships on lawful, efficient and fair practices, and Suppliers must adhere to applicable legal and regulatory requirements in their business relationships as set out in this Arabelle Solutions Integrity Guide for Suppliers, Contractors and Consultants (the "Guide") in connection with their activities for Arabelle Solutions.

Suppliers are responsible for ensuring that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in this Guide and in other contractual obligations to Arabelle Solutions. Please contact the Arabelle Solutions' manager you work with or any Arabelle Solutions' Compliance Resource if you have any questions about this Guide or the standards of business conduct that all Arabelle Solutions' Suppliers must meet.

Responsibilities of Arabelle Solutions' Suppliers

You, as a Supplier to Arabelle Solutions, agree:

Respectful Workplace: To (i) observe applicable laws and regulations governing wages, hours, overtime, recruitment and employment contracts; (ii) allow workers to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining as provided by local law or regulation; (iii) prohibit discrimination¹, harassment and retaliation; and (iv) treat all workers fairly and with respect.

Environment, Health and Safety: To (i) comply with applicable environmental, health and safety (EHS) laws and regulations and Arabelle Solutions' contractor EHS requirements; (ii) provide workers a safe and healthy workplace; and (iii) ensure that you are not adversely affecting the local community. If housing is provided or arranged, it must meet host country safety standards.

Forced Labor: To respect human rights of your employees and others in your business operations and activities for Arabelle Solutions, which includes the following: (i) prohibiting the use of forced labor, including prison or indentured labor, and ensuring workers are not subject to any form of physical, sexual or psychological compulsion, exploitation, violence, coercion or inhumane treatment, or other forms of human trafficking; (ii) ensuring that a worker's identity or immigration documents are not withheld or destroyed; (iii) allowing workers to terminate their employment, for any reason, with reasonable notice; (iv) ensuring that recruitment fees of any type are not deducted from workers' pay or otherwise charged to workers; (v) prohibiting the use of fraudulent or misleading recruitment practices; (vi) ensuring that, upon end of employment, workers are reimbursed for their return transportation costs (for workers recruited from outside the country); and (vii) providing workers with terms and conditions of employment in a language the worker understands.

Child Labor and Young Workers: To (i) prohibit the employment of workers under sixteen (16) years of age (or local legal age if higher); and (ii) prohibit the employment of workers under eighteen (18) years of age (or local legal age if higher) for hazardous work.

¹ Arabelle Solutions prohibits discrimination based on any protected characteristics, which include: race, color, religion, national or ethnic origin, ancestry, sex (including pregnancy and related conditions), gender (including gender identity and expression), sexual orientation, marital status, genetic information, age, disability, military and veteran status or any other characteristic protected by law.

Working with Governments, Improper Payments and Dealings with Arabelle Solutions' Employees and Representatives: To maintain and enforce (i) a policy requiring adherence to lawful business practices, including a prohibition against bribery; (ii) a prohibition against offering or providing, directly or indirectly, anything of value that would constitute a bribe or a kickback, including but not limited to cash, gifts, entertainment, offers of employment, or other types of benefit, to any Arabelle Solutions' employee, Arabelle Solutions' representative, Arabelle Solutions' customer or to any government official in connection with any Arabelle Solutions procurement, transaction or business dealing; and (iii) to agree to provide supporting data to Arabelle Solutions when requested.

Competition Law: Not to share or exchange any price, cost or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending or current Arabelle Solutions' procurement.

Intellectual Property: To respect the intellectual property rights of Arabelle Solutions and of third parties, including all patents, trademarks, copyrights and trade secrets.

Security and Privacy: To (i) respect individual privacy rights by collecting, handling and protecting Arabelle Solutions' Personal Information responsibly and compliantly; (ii) implement and maintain appropriate physical, administrative and technical controls that meet Arabelle Solutions standards and are designed to ensure the security and confidentiality of Arabelle Solutions Confidential Information² in order to prevent the unauthorized or unlawful destruction, alteration, modification or accidental loss of Arabelle Solutions' Confidential Information; and (iii) protect Supplier operations and facilities against exploitation by criminal or terrorist individuals and organizations.

Trade Controls and Customs Matters: Not to transfer Arabelle Solutions' technical information to any third party without the express, written permission of Arabelle Solutions, and to comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods, services, software, technology or technical data including any restrictions on access or use by unauthorized persons or entities.

Controllership and Tax Law: To ensure that all invoices and any customs or similar documentation submitted to Arabelle Solutions or governmental authorities or audited by third parties in connection with transactions involving Arabelle Solutions accurately describe the goods and services provided or delivered and the price thereof, to ensure that all documents, communications and accounting are accurate and honest and not to take or participate in any actions that may be viewed as tax evasion or the facilitation of tax evasion.

Responsible Mineral Sourcing: To (i) adopt policies and establish systems to procure tantalum, tin, tungsten, gold and other rare earth minerals from sources that do not directly or indirectly finance armed groups in the Democratic Republic of the Congo or Conflict Affected High Risk Areas; and (ii) provide supporting data on your supply chain for tantalum, tin, tungsten, gold, or other requested rare earth minerals to Arabelle Solutions when requested, on a platform to be designated by Arabelle Solutions.

Conflicts of Interest: Avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. A relevant conflict of interest typically occurs when personal interests interfere with or appear to interfere with Supplier's ability to perform the work/services without bias. Suppliers are expected to notify Arabelle Solutions if an actual or potential conflict of interest arises. This includes any situations of potential or apparent conflicts between Suppliers' or their employees' personal interests and the interests of Arabelle Solutions.

² Arabelle Solutions Confidential Information is information created or collected by Arabelle Solutions that would pose a risk of causing harm to Arabelle Solutions if disclosed to or used improperly, and includes but is not limited to Arabelle Solutions Highly Confidential Information and Personal Information.

Get Help - How to Raise a Question or Concern

Subject to local laws and any legal restrictions applicable to such reporting, each Arabelle Solutions' Supplier is expected to inform Arabelle Solutions promptly of any concern related to this Guide affecting Arabelle Solutions, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence. Arabelle Solutions' Suppliers also must take such steps as Arabelle Solutions may reasonably request to assist Arabelle Solutions in the investigation of any such occurrence involving Arabelle Solutions and the Supplier.

Prompt reporting is crucial — a question or concern may be raised by a Arabelle Solutions' Supplier as follows:

- By discussing with an Arabelle Solutions Manager; OR
- By emailing raiseaconcern@arabellesolutions.com; OR
- By contacting any Compliance Resource (e.g., Arabelle Solutions' legal counsel or auditor).

Note: Suppliers do not need to be certain that a violation has occurred, but rather should raise a concern when there is a good faith belief that something improper, a violation of law or policy, has occurred. Arabelle Solutions fully examines every integrity concern raised and takes necessary remedial actions where appropriate.

Arabelle Solutions **forbids retaliation** against any person reporting such a concern.
