COUNTERPARTY & SUPPLIER CODE

Last updated: November 2026

Version 1.0 · Sets out what Rathmar Trading, LLC, Rathmar Metals Ltd and Rathmar Metals A.Ş. expect of their suppliers, customers, logistics providers, agents and other counterparties. It forms part of our contracts.

1. COMPLIANCE WITH LAW

Counterparties comply with the laws that apply to them and to the transaction, including anti-corruption, sanctions, export-control, anti-money-laundering, competition, labor and environmental law.

2. ANTI-CORRUPTION

Counterparties do not offer, pay or accept bribes or facilitation payments in connection with business with Rathmar, and do not use intermediaries to do so.

3. SANCTIONS, OWNERSHIP AND END USE

Counterparties disclose their ultimate beneficial owners, tell us promptly of any change in ownership or of any designation, provide end-use and end-user statements when asked, and do not divert, re-export or transship goods contrary to the contract or to applicable measures.

4. LABOR AND HUMAN RIGHTS

No forced, bonded or child labor, consistent with ILO Conventions 29, 105, 138 and 182. Workers are paid at least the legal minimum wage, work safe and lawful hours, keep their identity documents, and are free to associate. Shipowners and managers meet the Maritime Labour Convention, 2006.

5. HEALTH, SAFETY AND ENVIRONMENT

Counterparties handle, store and ship goods in line with SOLAS, MARPOL, the IMDG Code and local rules, maintain spill and emergency response arrangements, and report incidents to us without delay.

6. PRODUCT INTEGRITY AND DOCUMENTS

Goods meet the contracted specification and are not adulterated or misdescribed. Bills of lading, certificates of origin and quality, inspection reports and other documents are genuine and accurate.

7. TRACEABILITY

Counterparties provide origin and chain-of-custody information on request and meet the traceability requirements of the destination market, including deforestation rules where they apply.

8. MINING, AGGREGATION AND REFINING

Miners, aggregators and refiners that supply Rathmar do not use the worst forms of child labor or forced labor, and do not buy material produced with them. They keep chain-of-custody documentation from the mine or point of export to delivery, with assay and weight records for each lot, and give Rathmar the right to audit their operations and records and to receive the information it needs to verify compliance with this Code.

9. INFORMATION, AUDIT AND REMEDIATION

Counterparties give us reasonable information and access to verify compliance with this Code. Where a breach is found, we expect a time-bound remediation plan; serious or unremedied breaches lead to suspension or termination.

10. REPORTING

Concerns may be reported confidentially at speakup@rathmar.com.