



## SUPPLIER AND CONTRACTOR CODE OF CONDUCT

Warrior Met Coal, Inc. and its subsidiaries (collectively the “Company”, “we” or “our”) are committed to conducting business in an ethical and honest manner, and in a way that promotes corporate social and environmental responsibility. We understand that the business practices and actions of a supplier or contractor may impact or reflect upon the Company. Therefore, we expect our suppliers and contractors to treat their employees and interact with communities in ways that respect human rights and adhere to the spirit and intent of the Company’s *Human Rights Policy*.

This policy sets forth detailed standards and expectations for each supplier and contractor concerning labor and human rights, health and safety, environmental protection, business ethics, and management practices. We expect our suppliers and contractors to comply with all applicable laws relating to employment, health and safety, trade, corruption, and the environment and to uphold the values set forth in the International Bill of Rights and the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work.

Suppliers and contractors shall provide safe working conditions, treat workers with respect and dignity, act fairly and ethically, and use environmentally responsible practices where possible in the course of making or providing products or performing services for the Company. Suppliers and contractors shall also conduct their business activities in full compliance with all applicable laws and regulations of the United States, as well as each country in which each operate. Any violations of this Code may jeopardize a supplier’s or contractor’s business relationship with the Company.

### I. Labor and Human Rights

As set forth in the Company’s *Human Rights Policy*, we believe that all workers deserve a fair and ethical workplace. We expect our suppliers and contractors to uphold these same values and establish and maintain high standards of human rights. Accordingly, all suppliers and contractors are expected to adhere to the following labor standards:

#### A. Child Labor Avoidance

Suppliers and contractors shall not engage in or condone the unlawful employment or exploitation of children and shall also comply with all other applicable laws and regulations regarding the employment of minors.

#### B. Voluntary Labor

All work must be voluntary and suppliers’ and contractors’ workers shall be free to leave work at any time or terminate their employment. Suppliers and contractors shall not engage in any form of human trafficking or use any type of forced labor including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking.

#### C. Freedom of Association and Collective Bargaining

As legally permitted, suppliers and contractors shall respect rights of workers to associate freely with others, form, and join or not join labor unions or organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment and shall comply

with all applicable local and national laws pertaining to freedom of association and collective bargaining.

#### **D. Discrimination**

Suppliers and Contractors must be committed to a workforce free of harassment and unlawful discrimination and should be committed to providing equal opportunity to their employees. Workers shall be employed on the basis of their ability to do the job and shall not be subjected to discrimination on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, or any other status protected by applicable law. in hiring and other employment practices such as promotions, rewards, and access to training.

#### **E. Work Hours, Wages and Benefits**

Suppliers' and contractors' employees shall have the right to fair working conditions, competitive wages, and reasonable working hours. Suppliers shall ensure full compliance with applicable wage, work hours, overtime, and benefits laws.

### **II. Health and Safety**

Suppliers and contractors must be committed to the safety and health of their employees and shall provide and maintain a safe work environment. In doing so, they must comply with all applicable safety and health laws and regulations, as well as the Company's internal safety policies when working on Company property, and should strive towards identifying and addressing any actual or potential health and safety hazards associated with their operations. Suppliers and contractors must promptly report and take immediate steps to correct all accident, injuries, unsafe or unhealthy conditions, and potential violations of health and safety laws.

Suppliers and contractors are responsible for assuring that all workers are qualified and have sufficient training to perform their work functions safely.

### **III. Environment**

Suppliers and Contractors shall develop, implement, and maintain environmentally responsible business practices, such as seeking ways to conserve natural resources and energy and reduce waste to minimize adverse impacts on the environment.

#### **A. Compliance with Environmental Laws**

Suppliers and contractors must comply with all applicable environmental laws and requirements, including those relating to obtaining, maintaining, and adhering to environmental permits and approvals for the conduct of regulated activities; the management and disposal of hazardous materials; releases of contaminants to the air, soil, and water; the protection of natural resources, wildlife and wetlands; the prohibition or restriction of specific substances; and the recycling of materials and environmental claims.

#### **B. Environmental Permits**

When applicable, suppliers, and contractors shall obtain, keep current, and comply with all required environmental permits, and shall comply with the reporting requirements of applicable permits and regulations.

### **C. Hazardous Materials**

Where applicable, suppliers and contractors shall implement a systematic approach to identify, manage, and responsibly dispose of, or recycle, hazardous substances and other materials posing a hazard if released into the environment.

### **D. Pollution Prevention and Resource Reduction**

Suppliers and contractors should implement processes to reduce or eliminate waste of all types, including water and energy.

## **IV. Ethics and Standard of Conduct**

Suppliers and contractors are expected to conduct business with integrity, mutual respect, and to uphold the highest standards of ethics and behavior in every aspect of their businesses.

### **A. Business Integrity**

Suppliers and contractors shall not engage in or tolerate corruption, misrepresentation, extortion, embezzlement, kickbacks, bribery, and any other type of corrupt actions to obtain or retain business or to obtain an unfair or improper advantage. They shall abide by the Foreign Corrupt Practices Act (FCPA) and all applicable anti-corruption laws and regulations of the countries in which they operate.

Suppliers and contractors must immediately report to the Company any circumstance where an officer, director, employee, representative, or agent of the Company or any of its subsidiaries has made any improper request or demand of the supplier or contractor that could violate this policy. All business dealings, structure, financial situation, and performance should be transparently performed and accurately reflected on suppliers' and contractors' corporate books and records in accordance with applicable laws and regulations as well as prevailing industry business practices.

### **B. Gifts**

The Company expects that all business transactions on its behalf will be at arms-length and free of outside influence. For this reason, Company employees may not offer or accept gifts or other gratuities that could be perceived as influencing them to favor any person doing business or seeking to do business with the Company. Nor should a gift be given if: (i) it is made with the intent or perceived intent to be a bribe, kickback, or other illegal or illicit payment; (ii) is given in exchange for any consideration; and, (iii) it creates the appearance, or an actual or implied obligation, that the gift giver is entitled to preferential treatment, an award of business, better prices, or improved terms of sale.

For a more detailed description regarding gifts, please see the Company's *Code of Business Conduct and Ethics* and *Anti-Corruption and Anti-Bribery Policy*.

## **V. Records**

The Company expects its suppliers and contractors to maintain books and records that reflect all transactions in an accurate, honest, and timely way.

## **VI. Audit**

The Company reserves the right to audit all contractors and suppliers, on an annual basis, for their compliance with this code.

## **VII. Goal**

It is the Company's goal to build trust-based relationships with ethical suppliers who follow these principles. When there is a concern, Company practice is to work with our suppliers and contractors towards a mutually agreeable solution. However, when an issue can't be corrected or a supplier or contractor is unwilling to engage in a meaningful way, we reserve the right to end the business relationship.

Adopted: January 1, 2023