



## Code of Conduct

**Summit Technology & Resources Inc.** (hereinafter “Summit”) is committed to conducting its business with the highest standards of integrity, transparency, and in accordance with sound, ethical, and sustainable business practices. We build and maintain relationships of trust with our employees, business partners, shareholders, communities, and government authorities. Our conduct directly affects our reputation, stakeholder confidence, and long-term success.

This Code of Conduct defines the standards of behavior expected from everyone acting on behalf of Summit in the performance of their duties. It applies worldwide to all employees (including temporary personnel), officers, directors, consultants, contractors, agents, and any other persons representing the company.

Each person covered by this Code must carefully review it, understand their obligations (considering the nature of their role), and seek guidance when in doubt. Management is responsible for promoting compliance, monitoring adherence, and addressing concerns. Violations will not be tolerated and may result in disciplinary action, up to and including termination of employment or contract, in line with applicable law and company procedures.

Adopted: 2026/02/02



## 1. Core Values and Expectations

We expect all individuals to exercise good judgment, care, and consideration in all activities, even in situations not explicitly covered by this Code or other policies. Our core values include:

- Integrity and ethical conduct in every transaction
- Transparency and accountability
- Respect for human rights, diversity, and dignity
- Responsible sourcing and sustainability in minor metals supply chains
- Fairness and loyalty in business relationships

## 2. Compliance with Laws and Regulations

We comply with the letter and spirit of all applicable local, national, and international laws and regulations, including trade controls, sanctions, anti-money laundering, export/import rules, antitrust/competition laws, and environmental standards. In the minor metals sector, this includes frameworks such as:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; and
- UN Guidance for Action on Critical Energy Transition Minerals; and
- United Nations Convention Against Corruption (UNCAC); and
- Other guidance on Conflict Minerals and Anti-Bribery laws in our areas of activity.

Seek advice from Legal or Compliance when requirements are unclear. Do not assist or facilitate any breach of law.

## 3. Business Integrity and Non-Retaliation

We foster a culture where ethical concerns can be raised without fear. Employees and representatives must feel able to promptly report any suspected violation of law, this Code, or company policies to their direct manager.

## 4. Human Rights and Responsible Sourcing

Summit condemns and does not tolerate any violation of human rights, including child labor, forced labor, modern slavery, or other exploitative practices. It is our policy to source minor metals and related materials in a transparent, ethical, and responsible manner—free from unlawful child or forced labor, human rights abuses, or contribution to conflict or instability. We



conduct appropriate due diligence on our supply chains, in line with the OECD Guidance and applicable regulations, to avoid sourcing from conflict-affected or high-risk areas without verified responsible practices.

For detailed requirements, refer to our Conflict Minerals Policy. Suppliers and business partners are expected to uphold equivalent standards; we monitor and address non-compliance.

5. Anti-Bribery and Corruption

We maintain a zero-tolerance policy toward bribery, corruption, kickbacks, or facilitation payments. No employee or representative may offer, promise, give, solicit, or accept anything of value to improperly influence business decisions, public officials, or private parties. Gifts, hospitality, and entertainment must be modest, transparent, appropriate to the circumstances, and compliant with law and company policy. All such items exceeding USD 1,000.00 require prior approval and documentation.

6. Conflicts of Interest

Employees owe a duty of loyalty to Summit. Avoid situations where personal, family, or financial interests could interfere with company interests. Promptly disclose actual or potential conflicts (e.g., financial interests in suppliers/competitors, family members in the industry, outside business activities) to your supervisor. Transparency and recusal from all relevant parties help manage risks.

- Prohibited or restricted activities include:
- Improper advantages for oneself or related persons
- Insider trading based on material non-public information
- Unauthorized use of company assets or resources

7. Fair Trading and Competition

Compete vigorously but fairly. Do not:

- Engage in price-fixing, market allocation, bid-rigging, or other anticompetitive conduct
- Spread false or misleading information about competitors
- Acquire competitors' confidential information improperly

8. Personal Conduct, Equal Opportunity, and Respect

Act honestly, responsibly, and with respect for others and cultural differences. We prohibit



harassment, discrimination, bullying, or any behavior based on protected characteristics (e.g., gender, race, religion, age, disability, sexual orientation). We are committed to an inclusive workplace with equal opportunities in recruitment, development, and advancement based on merit.

9. Confidentiality and Protection of Assets

Always safeguard confidential and proprietary information (company, client, supplier). Do not disclose or use it for personal benefit during or after employment without authorization. Return all materials upon departure.

10. Accurate Records and Financial Integrity

Maintain complete, accurate, and transparent records. Follow accounting principles and internal controls. Never falsify entries, misclassify transactions, or mislead in reports or disclosures.

11. Media and External Inquiries

Direct all press, media, investor, or regulatory inquiries to Mr. Bing Lee to ensure consistent and accurate communication.

12. No Contractual Rights; Amendments

This Code sets expectations and principles; it does not create contractual rights. Summit may amend it at its discretion.

By continuing employment or representation, you acknowledge your commitment to uphold this Code. Regular training and acknowledgment may be required.

Summit Technology & Resources Inc. Leadership Team