



Arch
Resources,
Inc.
Supplier
Code of
Conduct

ARCH
RESOURCES

PURPOSE

This Supplier Code of Conduct sets forth the key principles under which suppliers to Arch Resources, Inc. and its subsidiaries (“Arch”) are required to operate.

Introduction

Arch is committed to doing business ethically and safely and to following all laws that apply to it, and expects its suppliers to meet the same standards.

This Supplier Code of Conduct is to formalize Arch’s practices and to make clear that Arch expects those providing products and services to us (collectively, “Suppliers”) to meet the above commitment and help Arch maintain its reputation.

Arch specifically expects its Suppliers to:

- Act with integrity
 - Suppliers are expected to never misrepresent or purposely omit material facts relating to Arch business or billings.
 - Suppliers are expected to deal fairly with Arch, its employees and other suppliers
 - Suppliers are expected to not engage in the following activities:
 - Defaming or lying about a competitor’s business or products;
 - Making false statements;
 - Obtaining information by inappropriate means.
 - Suppliers shall never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with Arch’s business
 - Suppliers are expected to avoid any conflict of interest relating to financial interests or other arrangements with Arch employees that may be considered inappropriate

- Follow the law

- Suppliers shall know and follow the laws that apply to them and their business
- Suppliers are expected to treat legal requirements as a minimum standard
- Suppliers shall follow all applicable requirements related to safety and health, and shall notify Arch if a violation of such requirements occur while the Supplier's employees are on Arch's premises
- Suppliers are expected to notify Arch as to any material issues with the goods and services they supply—especially health and safety issues.
- Suppliers are expected to support Arch's commitment to the environment by operating in full compliance with both the letter and the spirit of environmental laws and Arch policies and by actively encouraging care and regard for the environment.
- Keep accurate records
 - Suppliers' books and records shall be accurate and clearly describe and identify the relevant facts or the true nature of the transaction with Arch, and properly and timely classify and record entries in compliance with accounting principles;
 - All claims, vouchers, bills and invoices shall be accurate and proper;
 - Time spent on Arch work shall be recorded and reported appropriately;
 - Arch equipment and other property and resources are expected to be used only for Arch business; and
 - When Arch auditors or managers ask Suppliers to respond to requests, the responses are expected to be complete and truthful
- Treat people with respect
 - Suppliers shall provide equal opportunity for employment and advancement on the basis of ability and aptitude without regard to race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity or veteran status.
 - Suppliers are expected to recognize and compensate employees based on their performance.
 - Suppliers shall take affirmative action with respect to all employment practices affecting minorities, females, veterans and individuals with disabilities.
 - Suppliers shall provide benefits without regard to race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity or veteran status.
 - Suppliers shall ensure that their employees do not engage in any conduct that creates an intimidating, hostile or offensive work environment.
- Protect Arch's information
 - Suppliers shall not use any Arch proprietary or confidential information, except as required by the work.
 - Suppliers shall not disclose Arch's proprietary or confidential information to any unauthorized person or company.
 - Suppliers shall take appropriate action to prevent the disclosure of any of Arch's confidential or proprietary information so that unauthorized persons do not have access to it.

- If a data breach occurs, Suppliers are expected to immediately notify Arch, and take appropriate actions to mitigate the effect of the breach.

Arch considers its reputation for fairness and integrity to be one of its most valuable assets. We want to build trust-based relationships with our Suppliers who follow the above principles. We expect our Suppliers to cooperate with our requests for information and audit access. If a concern arises, our desire is to work with the Supplier to identify possible improvements. However, if a Supplier cannot or will not correct an issue, we reserve the right to end the relationship.