

# SUPPLIER CODE OF CONDUCT

## Introduction

Xtek, Inc. and its family of companies are committed to conducting business with integrity, respect, and accountability and in compliance with all laws. We expect our partners and suppliers to uphold these same principles. This Code reflects our shared responsibility to maintain ethical practices, protect human rights, and deliver superior performance while safeguarding environmental health and safety.

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## 1. Human Rights and Labor Practices

- **Prohibition of Human Trafficking, Child Labor, and Forced Labor**

Suppliers must not engage in or support any form of human trafficking, child labor, or forced labor. Suppliers shall only employ workers who meet the applicable minimum legal age requirement and employment must be voluntary; workers should have the freedom to leave employment after reasonable notice.

- **Fair Treatment and Dignity**

All workers must be treated with dignity and respect. Suppliers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Harassment, discrimination, or abuse of any kind is strictly prohibited.

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## 2. Ethical Business Conduct

- **Anti-Corruption and Anti-Bribery**

Suppliers must comply with all applicable anti-corruption laws. Offering, giving, or receiving bribes, kickbacks, or improper payments is prohibited.

- **Conflicts of Interest**

Suppliers should avoid situations where personal interests conflict with business responsibilities. Any potential conflicts must be disclosed promptly.

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## 3. Environmental Health and Safety and Responsible Sourcing

- **Health and Safety**

Suppliers shall provide a clean, safe, and secure working environment. Suppliers shall comply with all health and safety laws and create a workplace that identifies and addresses potential hazards.

- **Environmental Stewardship and Sustainability**

Suppliers should adhere to all environmental laws and regulations and engage in practices that mitigate environmental impacts when feasible.

- **Conflict Minerals**

Suppliers must exercise due diligence by taking reasonable steps to ensure that cassiterite, columbite-tantalite, gold, wolframite, tantalum, tin, or tungsten, if any, in their products do not contribute to armed conflict or human rights abuses. Any potential conflicts must be disclosed promptly.

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#### **4. Quality and Performance**

##### **Commitment to Excellence**

Suppliers are expected to deliver high-quality products and services that meet or exceed performance standards. All goods and services must comply with applicable quality, safety, and labeling requirements. Supplier shall insure that any AI output is accurate and complies with all laws and contractual requirements.

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#### **5. Audit and Compliance**

##### **Audit Rights**

Our organization reserves the right to audit supplier facilities, practices, and records to ensure compliance with this Code. Non-compliance may result in corrective actions or termination of the business relationship.

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#### **6. Reporting Violations**

- Suppliers are encouraged to report any suspected or actual violations of this Code. Reports can be made through our Ethics Hotline, operated by Navex, which allows for anonymous reporting online ([xtek.ethicspoint.com](https://xtek.ethicspoint.com)) or by phone (844-564-3123). Reports will be promptly investigated.
  - Retaliation against anyone who reports in good faith is strictly prohibited.
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#### **Conclusion**

By adhering to this Supplier Code of Conduct, we affirm our shared commitment to ethical practices, respect for human rights, safety, responsible sourcing, environmental stewardship, and superior performance. Together, we build trust and deliver value responsibly.