



Date: _____

Supplier's Code of Conduct
S.C. ELMET INTERNAȚIONAL S.R.L.

To our chain of Distributors:

S.C. Elmet Internațional S.R.L. is committed to complying with the best practices regarding integrity in business conduct, including in dealing with our suppliers, entrepreneurs and consultants. Our commitment to operating according to ethical standards is an important factor that makes it easier for us to achieve our business goals and meet the demands of the current market.

An efficient and ethical suppliers chain is extremely important for our ability to support our goals and those of our customers. Integrity, safety and quality are fundamental to our performance and we encourage a collaborative environment with our supplier's chain in these areas. Our customers rely on our collaboration with suppliers, entrepreneurs and other business partners who share these values.

In order to support business integrity in our activities, we require our supply chain members to support our values relating to the many areas defined in this Supplier Code of Conduct (the "Code"). The principles set out in the Code are a fundamental part of our mutual commitment to how we conduct business and are an integral part of every relationship you have with us. The code is also consistent with the principles set out in the Supplier Code of Conduct supported by the International Forum for Business Ethics in the aerospace and defense industry in the U. S. and Europe.

Thank you for making your contribution by helping us maintain a cutting-edge standard of business integrity.

Radu Biceră
General Manager
S.C. Elmet Internațional S.R.L.



1. APPLICABILITY

Welcome S.C. ELMET INTERNAȚIONAL S.R.L. Supplier's Code of Conduct (the "Code"). Conducting our business honestly, ethically and appropriately is extremely important to the continuing success and development of the Company.

2. SCOPE

The purpose of this Code is to facilitate the commitment of our supplier, entrepreneurs and consultants (collectively the "Distribution Chain") to ethical and business-compliant conduct. In addition to the specific provisions of the Code and other policies, procedures or contractual obligations of the Company that we may require you to follow, we expect members of our Distribution Chain to conduct their business in an ethical manner and in compliance with all applicable laws and regulations. This Code intends to promote a culture that complies not only with the letter but also the spirit of all applicable laws, rules and regulations and the Company's policies and procedures.

This Code incorporates the principles of compliance for best practices in the distribution chain and is based on the Code of Business Conduct and Company Ethical Principles and our Policy Compliance with Anti-Bribery and Anti-Corruption Principles, each available for analysis at the request of the Department of Human Resources.

3. CONDUCTING THE BUSINESS

The Company's reputation is based on the delivery of systems and products that create value for our customers and protect and save lives. In order to preserve our reputation, we strive to achieve excellence in everything we do, including our behavior according to leading ethical standards. We expect our Supplier Chain to follow similar standards.

You should consult the principles of this Code when ethical and compliance issues arise. Each of the principles of this Code is fundamental to the way we conduct our business.

By entering into any subcontract or making a purchase order with the Company, you undertake to carry out your activities in a manner consistent with this Code. As such, all business activities that are related to the activity with the Company must be carried out in a manner that is fair, ethical and compliant with this Code and the applicable laws and regulations.



While the Code contains standards to follow, no document can cover all situations. If, for any reason, compliance with the Code conflicts with the legal requirements, you must comply with the legal provisions.

3.1 Compliance with legal provisions

You must comply with all legal provisions and regulations of the countries where the operations are managed or where the services are provided.

3.2 Human rights

We expect you to treat people with respect and dignity, encourage diversity, remain receptive to different opinions, promote equal opportunities and encourage an inclusive and ethical culture, in accordance with the International Labor Organization Conventions (ILO).

3.2.2 Work performed by children

You need to make sure that in carrying out the work you do not use the work performed by children. The term "child" refers to any person under the legal minimum age of employment at the place where the work is performed, provided that the legal age is consistent with the minimum working ages defined by the ILO.

3.2.3 Human beings trafficking, including Forced Work or Apprenticeship

You must comply with regulations prohibiting trafficking in human beings and comply with all applicable local laws in the country or countries in which you operate. This includes avoiding the violation of the rights of others. We expect you to resolve any impact of your operations on human rights.

3.3 Practices of employment

3.3.1 Harassment

We expect you to ensure that your employees are provided with an employment environment that will be free from physical, psychological and verbal harassment or other abusive conduct.

3.3.2 Non-discrimination

We expect you to provide equal opportunities for employees and job seekers without discrimination, consistent with all applicable regulations.

3.3.3 Salary and Benefits

You must pay workers the mandatory minimum compensation according to local law and ensure all authorized benefits. In the event of payment of regular working hours, workers must be paid



for overtime at legally binding increased rates or, in those countries where these laws do not exist, at least equal to the usual hourly rate of payment.

3.3.4 Free association

We expect you to respect workers' rights of free association and free communication with management regarding working conditions without fear of harassment, intimidation, sanction, interference or retaliation. We expect you to acknowledge and respect any rights of workers to exercise the legal rights of free association with any labor association of your choice.

3.4 Anti-corruption

3.4.1 Anti-corruption Laws and Regulations

You must comply with anti-corruption laws, directives and regulations governing operations in the countries where you conduct business. When you work with us, this includes complying with the United States Law on Foreign Corruption Practices, among other laws and regulations.

3.4.2 Zero Tolerance Policy

The company has a "Zero tolerance" policy against corruption, either carried out directly by Company employees or indirectly through our Distribution Chain. For more information, please refer to the Company's Anti-Bribery and Anti-Corruption Compliance Policy, which is available on request in the Human Resources Department.

3.4.3 Unlawful or Inappropriate Payments or Benefits

Conducting business in an appropriate way means not offering or receiving anything of value to gain business advantage or favorable treatment, or to exercise undue influence, including to offer, demand or take any form of illegal bribe or commission. This prohibition extends to payments and gifts in money or in kind made directly or through others. You must not make any unlawful payments to, or receive illegal payments from, any customer, supplier, their agents, their representatives or other persons. This includes a ban on facilitating payments intended to expedite or ensure the carrying out of routine government action such as obtaining a visa or customs clearance, even in places where these activities do not violate local laws.

3.4.4 The diligence required

We expect you to use due diligence to prevent and detect corruption in all business arrangements including partnerships, joint ventures, compensation agreements and hiring intermediaries such as agents or consultants.

3.4.5 Gifts/Business courtesies



We and our Distribution Chain must only compete based on the merits of our products and services. You must not attempt to influence a customer's decision to purchase our products or otherwise gain a competitive advantage by offering gifts, meals, travel costs, entertainment events or other business courtesies that exceed acceptable limits. Government agencies and companies have regulations that prohibit employees from accepting items of value from entrepreneurs or customers. In any business relationship, you should make sure that: (i) offering or receiving any gift or courtesy of business is permitted by law and regulations, and (ii) these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable market habits and practices. Although items offered free of charge with a nominal value may be provided or accepted in appropriate situations, cash or its equivalent (such as gift cards) is prohibited. For more information, see the Company's Gifts and Protocol Articles Policy which is available on request from the Human Resources Department.

3.4.6 Job offers

Job offers for employees or representatives of our customers or end users, for their close relatives, can be interpreted as an attempt to improperly influence decisions related to our programs. That is why you need to pay attention to employment activities to avoid the possibility of undue influence.

3.4.7 Fraud and Cheating

You must not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false statements, or allowing anyone to do so. This includes fraud or theft from the Company, a customer or a third party, and any type of illegal ownership of a property.

3.5 Competition and Anti-trust policy

We compete, but fairly and legally. Consequently, if you support us in our business, you must comply with applicable competition laws (sometimes referred to as anti-trust" laws) in all applicable countries. These laws prohibit formal or informal agreements or arrangements between competitors that restrict competition incorrectly. You do not have to set prices, make deals with your competitors or be part of a cartel. This includes a ban on exchanging information on current, recent or future prices with your competitors.

3.6 Inside Trading

You and your staff. you must not use materials or information that are not publicly disclosed obtained during the course of your business relationship with the Company as a trading



base or to help others to trade the shares or securities of any company. Also, acknowledging that the shares of the Company's parent company are publicly traded, you are required to comply with all the trading rules from the inside related to any business in which we are involved.

3.7 Conflicts of interest

We expect you to avoid all conflicts of interest or situations that appear to be a possible conflict of interest and to inform all affected parties if a real or potential conflict of interest arises. This includes a conflict between the interests of the Company and yourself or the personal interests of employees or the personal interests of close relatives of your employees, friends or associates.

3.8 Keeping Clear Records

We expect you to keep appropriate records to demonstrate compliance with this Code and all applicable laws and regulations. This includes creating records and not changing records in order to hide or misrepresent the related transaction represented by these records. Regardless of the format, all records recorded or received as evidence of a business transaction must fully and clearly represent the transaction or event that is documented. Records must be kept based on the requirements for keeping the applicable document.

3.9 Information protection

3.9.1 Protection of Sensitive Information

The Company is committed to ensuring the full protection of our intellectual rights and the rights of our customers and business partners, within the legal limits and within the limits of our contractual commitments. You must comply with all applicable laws and contractual requirements governing claims relating to intellectual property rights, including protection against disclosure, patents, copyrights and trademarks. We also require appropriate security measures to protect classified information and other sensitive information. When working with the Company, you must take the necessary steps to protect and safeguard intellectual property rights and sensitive information, including the following:

Proprietary Information which includes trade secrets, patents, trademarks, copyrights, business, marketing, financial data, human resources, publicly undisclosed technical and administrative information. You must safeguard the proprietary information of, or provided by,



the Company. They may not be distributed to third parties without the express written permission of the Company.

Classified Information includes data and articles that for reasons of national security must be protected and kept in accordance with applicable laws and regulations in support of the government program. To receive this information, your unit must have the appropriate security clearance approved by the government. It is important to remember that the disclosure of classified information to unauthorized persons will affect national security.

3.9.2 Use of Sensitive Information

You will properly manage sensitive information, including classified, proprietary and personal information. This information should not be used for any purpose (e.g. Advertising, publicity or similar) other than for the business for which it was provided, unless there is prior authorization from the owner of the information. Unauthorized use or distribution of Proprietary Information or Classified Information by any means, including social media, violates this Code. It may violate applicable law as well as contractual and regulatory requirements.

3.9.3 Information Security

You must comply with data privacy laws and must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, alteration and disclosure, by appropriate physical and electronic security procedures. We expect you to take the necessary information security measures for both computer systems and portable electronic devices, for protection against malware and unauthorized disclosure of any proprietary information and other program-related information provided by the Company. If there is a suspicion that a data breach has occurred, it is extremely important that these circumstances are immediately reported to the Company.

3.9.4 Social Media

You must not discuss or disclose on social media information related to the Company or your activities with the Company.

3.10 Marketing Materials and Interactions with Media

The Company controls the launch of marketing materials, press releases or media interviews that include references to the Company, affiliated companies, our customers, our end users or our cooperation activities with you. Any such launch requires the prior approval of the Company.

3.11 Environment, Health and Safety

3.11.1 Environmental, Health and Safety Management



You must comply with all environmental, health and safety laws and regulations at work. We also expect you to establish an appropriate management system for environmental, health and safety compliance.

3.11.2 Conservation of Natural Resources

We expect you to operate in a manner that actively manages the risks, preserves natural resources in the communities where you operate and *ensures environmental protection and pollution prevention according to ISO14001:2015.*

The use of natural resources, including water, fossil fuels, minerals and virgin forest products, must follow a saving process through practices such as the modification of production, maintenance and plant processes, replacement of materials, reuse, preservation, recycling or other means.

3.11.3 Employee Health and Safety Protection

You must protect the health, safety and well-being of your employees, entrepreneurs, visitors and others who may be affected by your activities.

3.12 Compliance with Global Trade

You must ensure that your business practices comply with all applicable laws, directives and regulations governing the import and export of parts, components and technical data. You will provide true and clear information related to export and import authorization processes and obtain import and export licenses and/or approvals as appropriate.

3.13 Responsible Supply with Minerals

You must comply with applicable laws and regulations regarding "Minerals in the conflict area!", which include tin, tungsten, tantalum and gold. In addition, you need to establish a policy to reasonably ensure that the tin, tungsten, tantalum and gold that may be contained in the products you manufacture do not finance directly or indirectly and do not benefit armed groups that are the authors of serious human rights abuses. You must use all due diligence, as required by law or industry practices, with respect to the source and chain of custody of these minerals and ask your secondary suppliers for the same.

3.14 Counterfeit Parts

We expect you to develop, implement and maintain effective methods and processes appropriate to your products to minimize the risk of introducing counterfeit parts and materials into products that will be delivered to us. In addition, you will ensure that the recipients of the products are informed of counterfeit parts when they are under warranty, and you will exclude them from the delivered product.



3.15 Government Public Procurement

3.15.1 Compliance with Government Contracting Regulations

Governments are the largest user of the company's goods and services, so it is crucial to comply with laws and regulations related to government contracts in the countries where you support our projects.

3.15.2 Information from the Chosen Sources

In working with the Company during any procurement process, you will not improperly obtain, use or disclose information from chosen sources or government proprietary information. You will not ask officials to disclose proprietary information of our competitors, nor will you improperly ask for materials from chosen sources - materials that the government has developed to evaluate the offers of the competition. In addition, you will take the necessary safeguards not to share any proprietary information or other program-related information without your permission.

3.15.3 The Lobby Activity

You are not authorized, directly or through others, to engage in lobbying activities designed to influence government policies, or the award or administration of government contracts, on our behalf or on behalf of our projects without our prior approval.

3.16 Expectations of the Ethics Program

3.16.1 Whistle Blowing Protection and Retaliation Risk-Free

We expect you to provide your employees with ways to address legal or ethical issues or matters without fear of retaliation. We also expect you to act to prevent, detect and correct any punitive activities. The Company's policy prohibits retaliation against anyone who makes an effort in good faith to report possible violations of the principles of this Code.

3.16.2 Consequences of Violation of the Code

If the requirements of this code are not satisfied, the business relationship may be reviewed and corrective actions may be applied subject to the terms of the related procurement contracts.

3.16.3 Policies of Ethics

Proportionate to the size and nature of your business, we expect you to establish management systems to support compliance with laws and regulations, as well as with the expectations expressed in this Code. We encourage you to implement your own code of conduct



and distribute those principles to entities that provide you with the goods and services. We expect you to maintain effective programs to encourage your employees to make ethical, value-guided choices in your business activities - beyond compliance with laws, regulations and requirements

3.17 Issues related to reporting

3.17.1 Self-monitoring and Reporting

We expect you to self-monitor compliance with this Code and promptly report any integrity issues that involve or affect the Company, whether or not the problem involves your company. Upon request, we expect you to help the Company investigate issues.

3.17.2 Reporting of the Contact Point

Prompt reporting is crucial. Complaints can be made by contacting the Human Resources Department or by email at: HR@elmet.ro.

3.18 Right to Audit

We reserve the right to periodically review your applicable business practices and records to ensure compliance with this Code. We expect you to comply with our reasonable investigations regarding your work for us and to cooperate with audits and investigations.