

# RTA Code of Ethical Conduct

## Overview

RTA's directors, senior management team, employees, and representatives are committed to complying with all laws and legislation, honouring their commitments, acting in good faith, upholding RTA's core values, advancing the interests of stakeholders, communicating openly and effectively, and holding themselves accountable at all times.

As our suppliers are a critical to our ability to provide superior products and services in a responsible and ethical manner we have the same expectations in respect to their behaviours and approach to conducting business.

This Code of Ethical Conduct (COEC) sets forth said expectations for all those involved in the provision of RTA products and services. It does not aim to be an exhaustive and comprehensive list of requirements, and RTA understand and expect suppliers to have their own internal COEC. Similarly the expectations contained within the RTA COEC are not intended to conflict with or modify the terms and conditions of any contracts with RTA and interested parties, nor is it intended to relax any more restrictive contractual obligations should they exist.

## Ethics & Compliance Program

Through the documented QMS, tools, and processes RTA ensure;

- compliance with applicable laws and legislation in the various countries of operation, as well as the general expectations of this COEC,
- awareness of this COEC and promote commitment to ethical business practices including, without limitation, the expectations contained within the RTA COEC,
- the facilitation of the timely discovery, investigation, disclosure (to interested parties), and implementation of corrective actions for violations of law, legislation, regulations, or COEC expectations, and
- provide training and information for employees and suppliers on compliance requirements, including the expectations of the RTA COEC.

## RTA's COEC Expectations of Suppliers

RTA expect suppliers to develop and implement their own code of conduct and management systems to support compliance with laws, regulations, expectations of the RTA COEC, and the promotion of fair and ethical business behaviours. This expectation includes the flow down of these codes of ethics to employees and other sub-tier suppliers within the RTA supply chain.

## Compliance with Laws

At a minimum RTA expects that all directors, managers, employees, and supplier company employees and representatives maintain full compliance with all local laws and regulations applicable to business locations.

## RTA Code of Ethical Conduct

### Anonymous Reporting & Reporting Misconduct

RTA directors and management operate an open-door policy to allow any employee or business partner to raise legal or ethical issues or concerns, including reports of violation of this COEC, without fear of retaliation. This includes anonymous reporting.

If a director, manager, employee, supplier representative, or other interested party becomes aware of misconduct in relation to this COEC, including legislative or regulatory breaches, they are encouraged to report the concern to Robert Musumeci, the owner and CEO of RTA International Inc. ([rmusumeci@rtaintl.com](mailto:rmusumeci@rtaintl.com)) or, if wishing to remain anonymous, in writing to Robert Musumeci, 189 Bedford Street, Stamford, CT 06901, marking the envelope "Private & Confidential".

### No Retaliation

RTA directors and management will not take any adverse action against any person or organisation that reports conduct that he, she, they reasonably believes to be illegal or in violation of this COEC.

It will be in violation of this COEC for any RTA employee to be discharged, demoted, threatened, harassed, or in any way adversely treated in connection with their employment because he or she reported conduct that he or she reasonably believed to be illegal or in violation of this COEC. Similarly it will be in violation of this code for any business relationship to be adversely affected with an organisation as a result of one of their employees reporting conduct that he or she reasonably believed to be illegal or in violation of this COEC.

### Quality

RTA operate under a QMS certified compliant to the requirements of AS9100 and AS9120, and as such are committed to providing quality products and services. RTA's hierarchy of priority is:

1. The health and safety of employees and customers.
2. The quality of products and services in terms of meeting customer design and purchase order requirements.
3. On time delivery to customer schedule and purchase order requirements.
4. Maintaining prices that provide genuine value.

RTA's QMS documents processes for the detection, communication, and correction of nonconformances with the aim of delivering products and services that exceed contractual quality, legal and regulatory requirements. All required inspection operations are completed by appropriately trained, qualified, and authorized company representatives. Testing and calibration is completed by approved third party bodies.

RTA expect that all suppliers providing product against RTA purchase orders establish similar processes that ensure all parts and products are appropriately inspected and tested by competent qualified individuals prior to delivery, and that health, safety, legal, and regulatory compliance is paramount within their business. RTA also expects that all suppliers have processes in place to detect and eliminate sources of nonconformance, as well as reacting without undue delay to reported concerns.

## RTA Code of Ethical Conduct

### Counterfeit Parts

RTA have implemented processes and procedures in line with AS6174 to assure the acquisition of authentic and conforming material, and to minimize the risk of introducing counterfeit and suspect parts into final products. Further processes are designed to detect counterfeit and suspect parts, provide notification to interested parties upon detection, and remove such parts from final products and the supply chain.

Counterfeit and suspect part prevention and detection forms part of the terms and conditions of RTA purchase orders, and supplier expectations are further documented in RTA's Supplier Quality Manual. Detected counterfeit product will be impounded and may be reported to the authority having jurisdiction.

### Environmental Health & Safety

RTA's commitment to, and the arrangements in place to maintain a safe and healthy work environment is documented in the company's Health and Safety Policy.

RTA's QMS documents how the company actively manages risk throughout the various processes and operations that are conducted each day by RTA employees, as well as interested parties and suppliers where appropriate.

All employees, interested parties, and suppliers are expected to conduct operations in a way that conserves natural resources, reduces waste (both energy and physical), reduces harmful emissions, prevents pollution, and safeguards the environment.

### Competition on the Merits

RTA compete purely on the value and merits of the products that we supply and the services that we design.

RTA select suppliers and award business with the same approach, treating each supplier on their own merits.

### Insider Trading

RTA employees, or other interested parties, will never use material, non-publicly disclosed information obtained in the course of doing business with customers, as the basis for trading, or enabling others to trade, in associated stock or securities.

### Conflicts of Interest

RTA continually review business relationships to ensure that all conflicts of interest, or situations giving the appearance of a conflict of interest are avoided. Should such instances be identified, it is RTA's policy to bring these to the attention of the interested party or parties, be they customers or suppliers. Examples include personal relationships that may affect decisions that could impact the business, and where a customer employee owns, or has a financial interest in either RTA or a supplier providing product to RTA that may be sold to the respective customer.

RTA expects any supplier who identifies a similar conflict of interest, either between the supplier and RTA, or between the supplier and RTA's customer, to raise the issue with RTA procurement prior to any further orders being accepted.

## RTA Code of Ethical Conduct

### Anti-Corruption/Fair Competition/Anti-Trust

No RTA employee will ever pay a bribe in any amount, to anyone, for any reason whatsoever, whether on an individual basis, the company's behalf, on behalf of a customer, or any other party. No RTA representative will ever offer, promise, authorize, or provide, directly or indirectly, anything of value with the intent or effect of inducing anyone (customer, end customer, employee, supplier, or sub-tier supplier) to forgo their duties and/or to provide an unfair business advantage to RTA, RTA's customers, suppliers, or any other interested party. This includes facilitating payments (e.g. payments to expedite or secure performance of a routine government action like obtaining a visa or customs clearance).

RTA employees will never engage in any anti-competitive conduct for any reason whatsoever, whether on an individual basis, the company's behalf, on behalf of a customer, or any other party. This includes rigging bids, fixing prices, pre-allocating customers or markets, or exchanging competitively sensitive information (price, costs, outputs, etc.) with any customer, company, or supplier competitor. RTA employees will also refrain from abusing any position of power, whether for individual benefit, the company's benefit, the benefit of a customer, or any other party, by refusing to deal, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a particular product or service with that of another product or service, or undertaking of similar abusive tactics.

RTA employees will never engage in other deceptive or unfair market practices, whether on an individual basis, the company's behalf, on behalf of a customer, or any other party. This includes making misrepresentations regarding customer, RTA, or other interested party's products or services. Similarly RTA employees will never, as a matter of principle, denigrate customer, customer competitors, RTA competitors, or their products or services.

### International Trade Compliance

RTA conduct business in strict compliance with all applicable laws governing the export, re-export and re-transfer of goods, technical data and services; the import of goods; any economic sanctions and embargoes that may be in place within the countries of operation; and U.S. antiboycott requirements.

RTA work with customers to ensure that their international trade compliance is preserved. This is particularly pertinent where special Customs procedures are utilized such as Inward Processing Relief (IPR).

All international trade compliance requirements and expectations are flowed down into the RTA supply chain.

### Security of Supply Chain

To protect the security of the supply chain RTA participate in the Authorized Economic Operator program, and only utilize shipping agents and freight forwarders with AEO recognition.

This requirement is flowed down to the RTA supply chain.

## RTA Code of Ethical Conduct

### US Government Procurement

Where a US government contract is being supported, either directly or through a customer, RTA are acutely aware of the need to comply with the unique and special rules that may apply. In such cases RTA will, at all times; follow the U.S. Government's rules for competing fairly; honour restrictions applying to U.S. Government employees (e.g. receipt of gifts and/or employment); deliver products that conform to specifications, laws, and regulations; adhere to government accounting and pricing requirements; claim only allowable costs; ensure the accuracy of data submitted; and comply with all other applicable U.S. Government requirements.

In line with U.S. Federal Acquisition Regulations, and similar international government regulations and reporting requirements, RTA are required to disclose to the Inspector General of the Department of Defense (or similar/equivalent position of the government agency holding the contract) and to the contracting officer certain suspect violations of law, this COEC, or regulations. If this suspected violation relates to a non-government customer, then that customer shall also be informed.

### Information Protection

RTA respect the legitimate proprietary rights and intellectual property rights of all RTA customers. Non-disclosure agreements are secured with customers and suppliers alike. All care is taken to protect sensitive information, including confidential, proprietary and personal information. Such information will never be used for any other purpose other than the business use for which it was provided, unless the owner of the information provides prior approval for a specified alternative use.

### Cybersecurity

RTA safeguard and protect all electronic information provided from external sources, as well as that generated by internal processes, from unauthorized access, destruction, use, misuse, modification, or disclosure. RTA continually assess risks and will take whatever action is required to mitigate threats to our information systems, products, services and supply chain, and to comply with all applicable contractual and legal requirements.

### Accuracy of Records and Submissions

All RTA business transaction records are accurately and completely reflective of all business transactions with our customers. No RTA employee will ever make or amend any entry into these records, alter, conceal or destroy any document, electronic or physical, to misrepresent any fact, circumstance, or transaction as it relates to our customer business interactions.

### Harassment

As documented in the RTA Employee Handbook, and communicated through employee induction, RTA will not tolerate any action, direct or indirect, physical, verbal or visual, that affects every employee's right to work in an environment free from physical, psychological or verbal harassment or intimidation, or any other form of abusive conduct.

## RTA Code of Ethical Conduct

### Non-Discrimination

RTA is an equal opportunities company, and will never discriminate against existing or prospective employees and business partners based upon race, color, religion, sex, sex stereotyping, sexual orientation, pregnancy (childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), gender, gender identity, gender expression, national origin, age, mental or physical levels of ability or disability, ancestry, medical condition, marital status, military or veteran status, citizenship status, genetic information, or any other protected status of an individual or that individual's associates or relatives.

### Child Labor

RTA will never employ child labor in any areas of the business and will refrain from trading with any company where child labor is found to be utilized. NOTE: The term "child" in respect of this COEC refers to any individual under the minimum legal age for employment as applied within the U.S.

### Human Trafficking

RTA will never engage in the use of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery, or trafficking in persons, and will always comply with national and international laws and regulations prohibiting such actions.

### Wages and Benefits

All RTA employees will be treated and paid fairly in relation to the work, roles, and responsibilities expected from them within the role that they are employed. The term fairly, in this respect, means that RTA will always pay at least the minimum wage required by the applicable laws and regulations and, at a minimum, provide all legally mandated benefits as required by the laws and regulations in the country of employment. All hourly workers will be appropriately compensated for overtime, at the rate required by applicable local laws and regulations.

### Substance Abuse

As documented in the RTA Employee Handbook, RTA senior management recognise that substance abuse is a disease and will provide support, including the identification of treatment, rehabilitation, and care facilities. However, to protect the business, employees, and interested parties, and to comply with local laws and regulations, no employee will be permitted to carry out work or remain on company premises while under the influence of alcohol, illegal drugs, or misused medications, whether prescription or non-prescription. This policy also prohibits employees from using, possessing, or selling illegal drugs, alcohol, or misusing medications while on company premises.

It is RTA's policy to refuse access to any individual (employee or non-employee) believed to be under the influence of illegal drugs and/or alcohol, or where the affect of prescription drugs may affect health and safety on site. RTA reserve the right to report such persons to their respective company of employment or local authorities. Any person found selling illegal drugs on RTA premises will be reported to the local authorities without exception.

## RTA Code of Ethical Conduct

### RTA's Business Partners

RTA carefully select business partners and suppliers based on capability, customer recommendation, reputation, business conduct, financial stability, legal and regulatory compliance, quality performance, and other risk-based analysis. RTA will continually and periodically assess/audit business partners, based on the level of risk assessed, to prevent and detect misconduct and any other non-conformance to business and quality requirements.

The requirements of this COEC will be flowed down to all business partners and suppliers at the start of the business relationship, and when any change is made to this COEC. It is RTA's expectation that the requirements of this COEC will be accepted, understood, and implemented by the business partner or supplier as a condition of doing business with RTA.

### Code of Ethical Conduct Compliance

RTA will permit customers, and authorized customer representatives, to assess the company's compliance with the expectations and requirements as stated within this COEC, including on-site audits of facilities, records (both electronic and physical) and other documentation as it pertains to the respective business relationship within the confines of the requirements of this COEC. If requested, RTA will provide any additional information and certification that evidences compliance to this COEC.

To fully assess compliance, RTA's customers must be able to assess RTA's business partners and suppliers in respect of RTA's flowdown of requirements, and the subsequent compliance of the business partner or supplier in respect of the COEC and its expectations. This includes on-site audits of facilities, records (both electronic and physical) and other documentation as it pertains to the respective business relationship within the confines of the requirements of this COEC. If requested, the business partner or supplier will provide any additional information and certification that evidences compliance to this COEC.

In the event of wrongdoing, RTA and RTA's business partners and suppliers, will cooperate fully with any related customer investigation as required. RTA (and affected RTA business partners and suppliers) will correct any nonconformances identified during assessments without undue delay.

The monitoring and full compliance with this COEC by our directors, officers, employees, representatives, and business partners is solely the responsibility of RTA as a company. It is RTA's expectation that this same responsibility is accepted and agreed by all suppliers accepting purchase orders from RTA.

For questions in relation to this COEC, including its application to specific circumstances in connection with RTA's, or your (business partner/supplier) performance of work or suspected failures to satisfy these expectations, please send your query to [sales@rtaintl.com](mailto:sales@rtaintl.com), identifying "Code of Ethical Conduct" in the email header.

### NOTE

This COEC may be used as a template by business partners and suppliers for their own code of conduct documents.