

# RISK MANAGEMENT



## Supplier Code of Conduct

May 2025

GA Telesis LLC

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## Executive Summary

The Code of Conduct for GA Telesis requires the board, employees, and those providing services to us to adhere to the highest levels of honesty, integrity, and ethics when conducting business. Maintaining exemplary business conduct requires each of us to uphold our high standards. Therefore, we expect our suppliers—along with their employees, officers, directors, agents, and representatives—to understand and adhere to this Supplier Code of Conduct (Code) in their daily business practices.

This Code sets the benchmark standards of acceptable ethical conduct that we require from suppliers doing business with or on behalf of GA Telesis. We acknowledge that suppliers may operate in different legal and cultural environments and when applicable, they must comply with local laws imposing greater obligations.

## 1. Governance and Ethical Business Practices

At GA Telesis, we take pride in the fact that we carry out our business in a professional and ethical manner. We take our responsibilities to our employees, customers, suppliers, investors, and other stakeholders, and the communities in which we operate, seriously and strive to meet the highest standards of behavior and decision-making. We have defined our approach to managing conduct across the company in our Code of Conduct.

We expect our suppliers to have similar policies and procedures.

### 1.1. CONFLICTS OF INTEREST

A conflict of interest may exist when the interests of an employee may be seen as competing with the interests of the Company. An employee may be considered to have a conflict of interest whenever there is an existing or potential financial or other material interest that impairs or might appear to impair their independence or objectivity in the discharge of their responsibilities.

We expect our suppliers to disclose any actual, potential, or perceived conflicts of interest prior to initiating their relationship with us, or as soon as a supplier becomes aware of a conflict after initiating a relationship.

### 1.2. INTEGRITY AND FAIR COMPETITION

We expect fair, non-collusive competition among our potential suppliers, contractors, and subcontractors. When entering business relationships with GA Telesis, suppliers must undertake to uphold fair business standards in advertising, sales, and competition.

### 1.3. ANTI-BRIBERY & CORRUPTION

Suppliers are expected to have policies, procedures, and internal controls to comply with applicable anti-bribery and anti-corruption laws and to ensure that subcontractors, agents, and anyone acting on their behalf also comply with such laws.

GA Telesis has a zero-tolerance approach to bribery and corruption. It is prohibited for suppliers and those acting on their behalf, to offer, make, give, solicit or accept any bribes, unauthorized payments, or other questionable inducements to influence any business transaction. No gift, hospitality, entertainment, or anything of value should be accepted or provided if it will obligate, or unduly influence, or may appear to obligate or unduly influence an action or decision.

#### **1.4. ANTI-MONEY LAUNDERING**

Suppliers must not engage in illicit activities, or do business with those engaged in illicit activities, including, without limitation, money laundering, human trafficking, terrorism financing, or the proliferation of weapons of mass destruction.

#### **1.5. SANCTIONS & EXPORT CONTROLS**

Trade embargoes and economic sanctions prohibit or severely restrict business activities with certain countries and their nationals, as well as business activities with specifically listed entities and persons. Suppliers must ensure strict compliance with all applicable US, UK, EU, UN, and other applicable sanctions, embargo, and economic laws and regulations, and provide regular training so that everyone is familiar and remains compliant with such laws and regulations.

#### **1.6. IMPORTS & EXPORTS**

Suppliers must ensure that their business practices are in accordance with all applicable import and export laws and regulations. Suppliers must provide accurate and complete information and obtain proper licenses and other authorizations where necessary.

#### **1.7. WHISTLEBLOWER**

Suppliers are expected to encourage good communication at all levels; employees should feel comfortable in approaching their supervisor or management. For situations where the employee might prefer to use a different communication channel, suppliers must make available a mechanism to report workplace complaints and compliance violations in accordance with local laws and regulations without fear of retaliation. Suppliers are also expected to take action to prevent, detect, and correct any retaliatory actions.

## **2. Human Rights**

At GA Telesis we place the highest priority on respecting the rights of our employees, the people with whom we work and those affected by our operations, wherever we operate in the world, treating them fairly, showing consideration for their needs and listening to and understanding their viewpoints.

We take pride in the fact that our workplace is inclusive and reflects the diversity of the communities in which we operate.

We expect our suppliers to be committed to, and have respect for, the protection and preservation of human rights, to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all and foster an inclusive and ethical culture. Suppliers are also expected to comply with the applicable regulatory requirements in their countries of operation.

#### **2.1. HARASSMENT**

Suppliers must respect people and promote a work environment that is free from harassing, coercive, or disruptive conduct, including sexual harassment, and conduct that creates an intimidating, hostile or otherwise offensive environment wherever they operate in the world, treating everyone fairly, showing consideration for their needs and listening to and understanding their viewpoints.

## **2.2. NON-DISCRIMINATION**

We expect our suppliers to offer equal employment opportunities to all, based on skills, experience and qualifications, and not discriminate based on race, religion, national origin, gender, sexual orientation, disability, or any other similar basis.

## **2.3. PROHIBITING CHILD LABOR**

Suppliers must take all necessary steps to ensure that there is no child labor within their organizations or supply chain, adhere to the minimum age provisions of national labor laws and regulations, and, where national law is insufficient, consider international standards (like ILO's Convention). Suppliers must work towards the elimination of child labor.

## **2.4. POLITICAL & RELIGIOUS ACTIVITIES**

Suppliers must recognize the rights of individuals to take part in political or religious activities and maintain a neutral position with respect to politics and religion.

## **2.5. FREEDOM OF OPINION**

It must be recognized by the suppliers that every individual has a right to freedom of opinion and expression, and that this right guarantees that no one may be harassed on account of their opinions.

## **2.6. MODERN SLAVERY**

Suppliers must not engage in any form of modern slavery, including forced labor, child labor, or human trafficking. They are expected to comply with all applicable laws and ensure these standards are upheld throughout their supply chains.

# **3. Sustainability**

At GA Telesis, we are committed to conducting our business in a responsible and sustainable manner. We recognize that environmental stewardship, social responsibility, and ethical governance are essential for our company's sustained success and the well-being of the communities we serve.

We expect our suppliers to share this commitment by actively working to reduce their environmental impact, upholding human rights, promoting safe and inclusive workplaces, and operating with integrity. Together, we can drive meaningful progress toward a more sustainable and resilient global supply chain.

## **3.1. ENVIRONMENTAL COMPLIANCE**

Suppliers must comply with all relevant environmental laws and industry standards, including aviation and manufacturing regulations. All necessary permits must be obtained and maintained.

## **3.2. SUSTAINABLE MATERIALS**

Suppliers shall ensure that all materials comply with applicable chemical regulations, including EU directives such as REACH and RoHS, as well as U.S. regulations like TSCA and FAR. To safeguard worker health and environmental integrity, complete and up-to-date documentation, such as Safety Data Sheets (SDS) and traceability records, must be maintained and made available upon request.

### **3.3. CARBON AND ENERGY**

Suppliers will define ways to reduce their carbon footprint through energy efficiency, renewable energy use, and optimized logistics. It is encouraged, if applicable, to align with the Science Based Targets initiative (SBTi) and comply with the Carbon Border Adjustment Mechanism (CBAM).

### **3.4. WASTE, CIRCULARITY, AND WATER STEWARDSHIP**

Suppliers are expected to adopt circular economic practices, such as reuse, recycle, and waste reduction, and implement measures to minimize water usage and prevent pollution. This includes proper waste disposal, avoiding hazardous discharges, and using water recycling technologies where feasible, in support of GA Telesis' sustainability goals.

### **3.5. HEALTH AND SAFETY**

Suppliers must ensure safe working conditions, provide personal protective equipment (PPE), conduct training, and comply with all health and safety laws to prevent injuries and illnesses.

### **3.6. PACKAGING AND LOGISTICS**

The use of minimal recyclable packaging and low-emission transportation methods is expected.

### **3.7. TRANSPARENCY AND ESG REPORTING**

Suppliers must share sustainability performance data upon request. Participation in the Carbon Disclosure Project (CDP), EcoVadis, or similar frameworks is encouraged.

### **3.8. AUDITS AND COMPLIANCE**

GA Telesis reserves the right to audit sustainability practices. Suppliers must cooperate and take corrective action when necessary.

## **4. Sanctity Of Information**

GA Telesis is committed to protecting and respecting data privacy and employs multiple controls in the protection of corporate data and Information System assets. The controls are based on the Center for Internet Security's (CIS) v8.0 Framework.

### **4.1. PRIVACY & CONFIDENTIALITY**

All suppliers must properly handle sensitive information, including confidential, proprietary, and personal information. Information cannot be used for any purpose other than the business purpose for which it was provided unless there is prior authorization from the owner of the information.

#### **4.2. RECORD KEEPING**

Suppliers are expected to maintain accurate, timely, and complete operational and financial records. The financial and accounting records serve as a basis for managing suppliers' businesses and are essential in fulfilling responsibility to stakeholders and other business partners.

#### **4.3. COMPANY PROPERTY, RECORDS, AND INFORMATION**

Where applicable, suppliers must protect physical assets, including facilities, equipment, inventory and supplies from loss, theft, or damage. Suppliers must have protocols in place to protect the exclusive information of others, including personal information, from unauthorized access, destruction, use, modification, and disclosure.

#### **4.4. INSIDER TRADING**

Suppliers may not use non-public information about any company or its business to trade in the company's stock or pass such information along to others so that they may do so.

#### **4.5. INTELLECTUAL PROPERTY**

Suppliers must respect and, when appropriate, protect intellectual property rights, including copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible property.