



Supplier Code of Conduct

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1. Purpose and Applicability

Astrion is committed to conducting business ethically, lawfully, and responsibly. This Supplier Code of Conduct ("Code") establishes the standards and expectations applicable to suppliers, subcontractors, consultants, vendors, agents, and other third parties that provide products or services to Astrion or on Astrion's behalf.

Suppliers are expected to:

- Conduct business ethically and in compliance with applicable laws and regulations.
- Respect human rights and labor standards.
- Maintain safe and healthy working conditions.
- Protect information, assets, and intellectual property.
- Promote fair competition and business integrity.
- Operate in an environmentally responsible manner.

Suppliers are expected to communicate and, where appropriate, flow down the principles of this Code to subcontractors, suppliers, agents, and other business partners supporting Astrion-related work.

This Code is not intended to conflict with or modify any contractual obligation. In the event of a conflict, applicable laws and regulations shall govern, followed by contractual requirements, and then this Code.

2. Compliance and Ethics Program

Suppliers shall maintain an ethics and compliance program appropriate to the size, nature, and risk profile of their business. Such programs should promote compliance with applicable laws, regulations, contractual requirements, and the expectations in this Code.

Suppliers shall maintain processes to identify, prevent, detect, and address violations of law, regulations, or this Code.

Suppliers shall provide employees with mechanisms for reporting concerns without fear of retaliation, including anonymous reporting where permitted by law.



Astrion prohibits retaliation against any individual who raises concerns in good faith or participates in an investigation. Concerns regarding potential violations of this Code may be reported through an Astrion representative or the Astrion Ethics Hotline at 833-600-5663

3. Human Rights and Employment Practices

Astrion expects suppliers to uphold human rights and treat all workers with dignity and respect.

Suppliers shall:

- Prohibit forced labor, bonded labor, involuntary labor, human trafficking, and modern slavery.
- Prohibit child labor and comply with applicable minimum age requirements.
- Comply with applicable laws regarding wages, benefits, working hours, and employment practices.
- Provide a workplace free from discrimination, harassment, abuse, intimidation, and retaliation.
- Respect employees' rights under applicable labor laws, including rights related to freedom of association and collective bargaining where applicable.
- Promote equal employment opportunity consistent with applicable laws and regulations.

Suppliers supporting U.S. Government contracts shall comply with applicable laws and regulations relating to combating trafficking in persons.

4. Health, Safety, and Workplace Responsibility

Suppliers shall provide safe and healthy working conditions and comply with applicable environmental, health, and safety laws and regulations.

Suppliers shall:

- Maintain safe working conditions.
- Promote workplace health and safety.
- Maintain emergency preparedness processes appropriate to their operations.
- Maintain a workplace free from the unlawful use, possession, or distribution of controlled substances.

5. Business Integrity

Suppliers shall conduct business honestly, ethically, and in compliance with applicable laws.

Suppliers shall:

- Comply with anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and applicable international laws.
- Not offer, provide, solicit, or accept anything of value intended to improperly influence business decisions.
- Comply with antitrust and competition laws.
- Avoid conflicts of interest and promptly disclose actual or potential conflicts involving Astrion-related business.
- Compete based on the merits of their products and services.
- Not use gifts, hospitality, or business courtesies to obtain an improper business advantage.

6. International Trade Compliance

Suppliers shall comply with all applicable import, export, customs, sanctions, anti-boycott, and anti-money laundering laws and regulations.

Suppliers shall:

- Obtain required licenses, permits, and authorizations.
- Conduct business only with legitimate and reputable parties.
- Provide truthful and accurate information to governmental authorities when required.
- Maintain reasonable measures to support supply chain security and trade compliance.
- Where applicable, support the responsible sourcing of raw materials, including conflict minerals, and provide the information Astrion needs for supply chain due diligence.
- Comply with applicable prohibitions and restrictions on sourcing from prohibited or restricted sources, including covered telecommunications and video surveillance equipment and services and entities identified under applicable U.S. laws and regulations.

7. Records and Business Documentation

Suppliers shall create and maintain complete, accurate, and truthful business records.



Records must accurately reflect underlying transactions and shall not be altered, concealed, or destroyed to misrepresent facts or activities.

Records shall be retained in accordance with applicable legal, contractual, and regulatory requirements.

8. Information Protection

Suppliers shall protect Astrion information, customer information, intellectual property, and other assets entrusted to them.

Suppliers shall:

- Protect confidential, proprietary, sensitive, Controlled Unclassified Information (CUI), and personal information from unauthorized access, use, disclosure, alteration, or destruction.
- When storing, processing, or transmitting Federal Contract Information or Controlled Unclassified Information (CUI), implement the required safeguards and cyber incident reporting requirements applicable to the information and required by contract, including FAR 52.204-21, NIST SP 800-171, DFARS 252.204-7012, and the Cybersecurity Maturity Model Certification (CMMS) program at the level specified.
- Respect intellectual property rights.
- Comply with applicable privacy, cybersecurity, and information protection requirements.
- Protect export-controlled information and comply with applicable export control requirements.
- Use Astrion information and assets only for authorized business purposes.
- Promptly notify Astrion of any actual or suspected security incident or unauthorized disclosure that may affect Astrion, its customers, or its programs.

9. Quality and Product Integrity

Suppliers shall maintain quality management processes appropriate to the products and services provided.

Suppliers shall:

- Deliver products and services that meet contractual requirements.
- Address quality issues in a timely manner.
- Maintain records supporting compliance with quality requirements.

- Take reasonable measures to prevent, detect, and report counterfeit parts or materials that may affect products delivered to Astrion or the Government.

10. Government Contracting

Suppliers supporting U.S. Government contracts shall comply with applicable federal acquisition laws, regulations, and contract requirements.

Suppliers shall:

- Compete fairly.
- Comply with applicable accounting and pricing requirements.
- Ensure the accuracy of information submitted to the Government.
- Promptly disclose violations when required by law or contract.
- Maintain eligibility to participate in U.S. Government contracting and promptly notify Astrion if debarment, suspension, proposed debarment, or other exclusions from U.S. Government programs occurs.
- Comply with applicable laws and regulations prohibiting kickbacks, gratuities, and other improper inducements in connection with Astrion-related work or U.S. Government contracts.
- Identify, disclose, and address actual or potential organizational conflicts of interest that may affect Astrion-related work.

11. Environmental Responsibility

Suppliers shall conduct operations in a manner that complies with applicable environmental laws and regulations and promote responsible environmental stewardship.

Suppliers should take reasonable measures to minimize environmental risks, reduce waste, conserve resources, and support sustainable business practices.

12. Artificial Intelligence

Suppliers utilizing artificial intelligence in connection with Astrion business shall comply with Astrion's Supplier Artificial Intelligence Policy and all applicable contractual, legal, and regulatory requirements.

13. Reporting Concerns and Enforcement

Suppliers are expected to promptly report known or suspected violations of this Code that may affect Astrion, its customers, or its programs.

Astrion reserves the right to assess supplier compliance with this Code through reasonable due diligence activities.

Failure to comply with this Code may result in corrective action, reporting to appropriate authorities, where required, or termination of the business relationship in accordance with applicable contractual rights.