
BUSINESS PARTNER CODE OF CONDUCT

PURPOSE AND SCOPE

Ethics and integrity are at the foundation of doing business at Pyrotek. Pyrotek Incorporated and its subsidiaries (“Pyrotek”) have operated with high ethical standards for over 65 years. To preserve the trust placed in us by our customers, we count on our network of suppliers and business partners across the globe to commit to and uphold our high standards of integrity and operating principles.

This Business Partner Code of Conduct, as amended from time to time (“Business Partner Code”), embodies a framework outlining the standards of integrity for which we strive throughout our business and supply chain. We encourage and expect our suppliers and business partners to adopt and uphold policies and ethical business practices consistent with the principles and requirements described in this Business Partner Code.

The term “Business Partner,” as used herein, refers to all suppliers, contractors, consultants, business partners, agents, distributors, resellers, and more generally any third party with whom Pyrotek and its affiliates do business. Sub-contractors of Business Partners are also expected to adhere to this Business Partner Code.

BUSINESS ETHICS AND ANTI-CORRUPTION

COMPLIANCE WITH LAW

Business Partners are required to operate in full compliance with all applicable statutes, laws, rules, and regulations of the country or countries in which they operate.

ANTI-CORRUPTION/ANTI-BRIBERY

Pyrotek expects its Business Partners to comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business. Business Partners or their representatives must not bribe, make, or offer to make any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons in violation of the law. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments are permitted where there is an imminent threat to health or safety. Business Partners are further expected to exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

COMPLIANCE WITH SANCTIONS REGULATIONS

Business Partners must act in compliance with all laws and regulations that govern importing and exporting of goods, services, technologies and information, including re-exports and parallel trade and any applicable economic or trade sanctions as further defined herein. Business Partners represent that neither the Business Partner nor any of its subsidiaries, owners, directors, officers, employees, agents or contractors (collectively “Business Partner Entities”) are (i) the target of any executive orders or sanctions regulations administered by the United States Department of the Treasury’s Office of Foreign Assets Control (“OFAC”), or any decree, ordinance or legally binding order, rule or requirement of the United Nations or under the laws of the European Union (“EU”), or EU member

State and any other state and/or authority related to trade sanctions, trade embargoes and other foreign trade controls, export controls, non-proliferation, anti-terrorism and similar laws (collectively, “Sanctions Regulations”); or (ii) included on any suspended, denied, debarred or otherwise ineligible list published by the US or other applicable jurisdiction (collectively, the “Sanctions List”). If Pyrotek becomes aware any Business Partner or its parent company or owner is included on any Sanctions List or is the target of any Sanctions Regulations, Pyrotek shall have the unilateral right to terminate any contract with the Business Partner to which it is a party, and/or take any other action Pyrotek considers appropriate to remain compliant with applicable Sanctions Regulations. In the event of such termination or other action, Pyrotek will be relieved of all liability and obligations of any kind, including but not limited to performance, shipment, reimbursement, credit, service or repair.

IMPROPER ACTIONS

Pyrotek expects Business Partners to avoid actions that may influence, or appear to influence, Pyrotek’s business decisions. For example, such actions may include: gifts or entertainment of excessive value and/or without business purpose, or offers of cash, cash equivalent, loans, or employment to Pyrotek’s employees or to their relatives.

CONFLICTS OF INTEREST

Business Partners are expected to avoid all conflicts of interest or circumstances giving the appearance of a potential conflict of interest. Such circumstances may be a business or personal interest in the subject matter - economical or otherwise - directly or through someone closely related.

BUSINESS PRACTICES

PRIVACY AND INFORMATION SECURITY

Business Partners are expected to respect Pyrotek’s information and requirements for confidentiality. Pyrotek expects all Business Partners to have stringent information technology controls in place to manage all information exchanged, and to provide immediate notification of any suspected security breaches which could potentially expose Pyrotek to risk or loss of information. Without express written authorization from Pyrotek, information exchanged between Pyrotek and Business Partners should not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided.

BUSINESS CONTINUITY/CONTINGENCY PLANNING

Pyrotek expects all Business Partners to have reasonable contingency and disaster plans in place to enable continuation, or expedited resumption, of supplies and/or services to avoid risk of business interruption to Pyrotek.

LABOR AND HUMAN RIGHTS

ETHICAL LABOR PRACTICES

Pyrotek does not tolerate any form of abusive or illegal labor in our supply chain such as child labor, forced labor, modern slavery or human trafficking. Pyrotek expects all Business Partners to prevent child and forced labor in their operations and supply chains. This includes all services or work performed by a child as that term is defined by the International Labor Organization (ILO) or any work performed under the threat of punishment or duress. All work performed in the Business Partner's business activities must be voluntary. For additional information regarding Pyrotek's commitment to ethical labor practices, please refer to Pyrotek's [Human Rights](#) and [Child and Forced Labor](#) Policies.

EQUAL OPPORTUNITIES

Pyrotek expects Business Partners to provide equality of opportunity and treatment to all employees. Business Partners should not discriminate in hiring and employment practices on grounds of race, color, religion, gender, sexual orientation, gender identity, age, physical ability, health condition, political opinion, nationality, social or ethnic origin, union membership or marital status. It is Pyrotek's policy to take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their veteran status or disability. Pursuant to 41 CFR §§ 60-300.44(f)(1)(ii) and 741.44(f)(1)(ii), we hereby notify you of our company policy related to our affirmative action efforts and request appropriate action on your part.

ANTI-HARASSMENT AND ABUSE

Pyrotek believes that all workers should be treated with dignity and expects all Business Partners to ensure a workplace free from harassment and abuse, including but not limited to verbal abuse, psychological harassment, mental and physical abuse or coercion, and sexual harassment.

WAGES AND BENEFITS

Pyrotek expects Business Partners to pay workers at least the minimum compensation required by local law and provide all legally mandated benefits.

WHISTLEBLOWER PROTECTION

Business Partners are expected to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. Business Partners are also expected to take action to prevent, detect, and correct any retaliatory actions.

ENVIRONMENT, HEALTH, AND SAFETY

CONCERN FOR THE ENVIRONMENT

Pyrotek is committed to minimizing environmental impacts, conserving natural resources and providing effective stewardship of the environment to reduce its carbon footprint. Similarly, Business Partners are expected to undertake their operations with due respect for the environment and a more sustainable future. Business Partners are expected to comply with relevant environmental laws and regulations and strive to minimize harmful discharge, emissions and waste production. Wherever possible, Business Partners should proactively assess, prevent and reduce the harmful effects that their actions and activities

can have on the environment. For additional information please refer to Pyrotek's [Environmental](#) and [Sustainability](#) Policies.

HEALTHY AND SAFE WORK ENVIRONMENT

Pyrotek expect Business Partners to prioritize and continually strive towards a healthy, safe and injury-free workplace for its employees and workers. Business Partners are expected to have appropriate systems and processes in place to manage and address occupational health and safety issues. Business Partners are also expected to train their employees and raise employees' health and safety awareness for the purpose of preventing accidents and occupational illnesses.

SUSTAINABLE PROCUREMENT

Business Partners are expected to exercise reasonable commercial efforts to cascade the principles contained in this Business Partner Code to their own suppliers and to implement a continuous improvement and compliance regime. For additional information regarding Pyrotek's commitment to sustainable procurement, please refer to [Pyrotek's Procurement Policy](#).

CONFIRMATION AND COMPLIANCE

Pyrotek expects all Business Partners to comply with this Business Partner Code and reserves the right to evaluate compliance through self-assessment surveys and review of applicable documents and policies. If any violation of this Business Partner Code is identified, the relevant Business Partner may, at Pyrotek's discretion, be given time to remedy the problem. If the problem is not addressed in an effective way and within a clear timeframe that is acceptable to Pyrotek, then Pyrotek reserves the right to terminate the relevant business relationship with the violating Business Partner.