



MILTOPE SUPPLIER CODE OF CONDUCT (MPP-1)

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I. OVERVIEW

Miltope Corporation is committed to maintaining a sustainable and ethical environment that promotes professional and ethical conduct of its management and employees, customers, business partners and other stakeholders.

We recognize our dependency on our suppliers for timely delivery of sustainable quality products and services. We actively manage our supplier relationships to build a resilient and sustainable supply chain by procuring the supply of goods and services ethically and responsibly.

This Supplier Code of Conduct (Supplier Code) is aligned with our sustainability agenda, defines our principles and policies, and lays down the basic requirements in behaviors and practices we require of our suppliers, including those pertaining to their responsibilities towards their stakeholders and the environment.

While conducting business directly or indirectly with and/or on behalf of Miltope Corporation for the benefit of our customers, our suppliers, including their parent entities, subsidiaries, affiliate entities, employees, sub-contractors and other relevant third parties, our suppliers shall commit to complying with the principles and standards expressed in this Supplier Code. They are also responsible for ensuring that this Supplier Code and its principles and standards are clearly communicated to their employees, sub-contractors and any other relevant third parties in a manner and/or language understood by all. Miltope Corporation also encourages all our suppliers to embody these sustainability-aligned principles and standards in their own procurement policies and practices.

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II. ENVIRONMENTAL

Miltope Corporation encourages our suppliers to protect the environment by conserving the use of resources, ensuring that their operations are efficient, controlling waste and effluents stringently, and developing greener products and services, including as follows:

1. Environmental Sustainability

- a) Subscribe to greener environmental practices in the design, production, delivery and after sales support of products and services as applicable;
- b) Operate in a manner that actively conserves natural resources and protects the environment;
- c) Comply with all applicable environmental laws and regulations, such as those relating to waste disposal, air emissions and pollution;
- d) Comply with all environmental requirements set by Miltope Corporation;
- e) Reduce greenhouse gas (GHG) emissions through performance and efficiency measures on a business-as-usual basis;
- f) Certified/Compliant to or considering implementing an internationally recognized Environment Management System such as ISO 14001 or its equivalent, where applicable.

2. Business Continuity

- a) Actively manage business disruption risks arising from climate change, natural and man-made disasters, pandemics, cyber attacks, etc., to minimize impact on the delivery of products and services;
- b) Certified/Compliant to or considering implementing an internationally recognized Business Continuity Management System such as ISO 22301 or its equivalent, where applicable; and
- c) Requires of their suppliers and subcontractors to likewise, actively manage business disruption risks.

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III. SOCIAL

Miltope Corporation has zero tolerance for unethical labor practices and expects all suppliers to provide a safe and healthy working environment, fair compensation and employee development programs. We expect our suppliers to uphold and respect the fundamental human rights of all individuals. We expect our suppliers to deliver quality products and services, source ethically and responsibly, and support the communities where they operate, including as follows:

1. Product Quality and Safety

- a) Demonstrate a commitment to quality and apply appropriate product safety practices in compliance with applicable laws, regulations, industry standards and good manufacturing practices that seek to reduce risk of hazards to their employees and subcontractors, our employees, our customers, our end users, the public, properties, and the environment;
- b) Ensure products and services meet or exceed Miltope Corporation's quality standards and contractual requirements;
- c) Has processes in place to prevent the risk of incorporating counterfeit parts and materials into their delivered products. Suppliers must provide immediate notification if counterfeit parts are detected or suspected; and
- d) Certified/Compliant to or considering implementing an internationally recognized Quality Management System such as ISO 9001 or its equivalent, where applicable.

2. Diversity, Non-Discrimination and Anti-Harassment

- a) Respect and support the fundamental principles set out in the United Nations [Universal Declaration of Human Rights](#), the International Labor Organization's Declaration on Fundamental Principles and Rights at Work ([ILO Declaration](#)), the [United Nations Global Compact](#), and the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#);
- b) Provide equal employment opportunity to their employees and applicants for employment without discrimination based upon age, race, religion, national origin, ethnic and social background, gender, marital status, physical or mental attributes; and
- c) Ensure that their employees are afforded an employment environment that is free from physical abuse, threats of physical violence, sexual or other forms of harassment including verbal or other forms of psychological abuse and intimidation.

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3. Ethical Labor Practices & Freedom to Associate

- a) Take measures to eliminate all unethical labor practices, including child labor, forced labor, modern slavery, and human trafficking, within their operations and ensure that these standards are upheld through their own supply chain; and
- b) Recognize and respect the rights of their employees to associate freely and to organize and bargain collectively in accordance with the local laws in which they are employed.

4. Workplace Safety & Health

- a) Provide a safe and healthy working environment for their employees;
- b) Comply with all applicable health and safety laws and regulations;
- c) Comply with all workplace safety and health requirements set by Miltope Corporation as per our Environment, Health and Safety (EHS) Policy for suppliers whose employees need to operate within our premises;
- d) Not engage in violence, harassment or threatening behavior towards their employees and subcontractors;
- e) Prohibit the use of illegal drugs by their employees and subcontractors; and
- f) Certified/Compliant to or considering implementing an internationally recognized Occupational Health & Safety Management System such as ISO 45001 or its equivalent, where applicable.

5. Wages & Working Hours

- a) Employees shall be fairly compensated for all hours worked and in compliance with applicable laws and regulations in the country of operation;
- b) Working hours, rest periods and paid leave shall comply with the applicable laws, standards and practices in the countries where the supplier operates.

6. Conflict Minerals

- a) Take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of conflict minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed conflicts; and

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- b) Provide supporting data on their supply chain sources for these minerals when requested

7. Community & Stakeholders

- a) Seek opportunities to help support, sponsor and contribute to the well-being and sustainability of their local communities through volunteerism, charitable giving and civic activities; and
- b) Listen carefully to requests or concerns from their stakeholders and address them appropriately.

IV. GOVERNANCE

Miltope Corporation is committed to good corporate governance and has zero tolerance for fraud and corrupt practices. Our suppliers are expected to do business with full transparency by also adhering to good Business Conduct and Ethics and observe the following:

1. Zero Tolerance for Corruption

- a) Not offer, give, accept or promise any sort of bribe, facilitation payment or kickback that may be viewed as, or has the effect of, improperly influencing business decisions;
- b) Comply with all applicable anti-bribery and corruption laws and regulations of the countries in which they operate and conduct business; and
- c) Report all suspected cases, actual breaches or concealment of any forbidden acts.

2. Gifts & Hospitality

- a) Compete on the merits of their products and services;
- b) Avoid the exchange of business hospitality and gifts that may be used as an attempt to influence, or be perceived by others to influence business decisions or official actions; and
- c) Ensure that the offering of any gift or hospitality is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

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3. Conflicts of Interest

- a) Avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest; and
- b) Provide notification to all affected parties in the event that an actual or potential conflict of interest arises, including conflicts between the interest of Miltope Corporation and personal interests or those of close relatives, friends or associates.

4. Political Contributions and Donations

- a) Refrain from making any corporate contributions or donations to political candidates, or political officials or political parties, intended as, or that may be perceived as, attempts to influence business decision making.

5. Trade Embargoes, Sanctions and Export Controls

- a) Comply with applicable national and international trade control laws and regulations when importing and exporting products, services, technology and information; and
- b) Possess up-to-date knowledge about international restrictive measures, controls and sanctions (or embargoes) adopted against certain countries, governments, organizations, entities, companies, individuals or assets; and do not engage in business with them, when doing so is prohibited by applicable laws and regulations.

6. Competition, Antitrust and Fair Dealing

- a) Act in accordance with the competition, antitrust, and similar laws in the countries where they operate or market and sell their products or services; and
- b) Avoid unlawful agreements or understandings that improperly limit or control production or price fixing, bid rigging, market allocation, limit or control production in a way that improperly restricts competition.

7. Security

- a) Safeguard Miltope Corporation assets from waste, loss, damage, theft, unauthorized disclosure, misuse or infringement, through appropriate physical and electronic security procedures;
 - b) Protect and safeguard information and intellectual property rights referred to in paragraph 17, 18 & 19 below through appropriate physical and electronic security
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procedures, including mitigating risk to information systems by implementing appropriate IT cyber security measures and practices. Any suspected or actual data breaches must be reported immediately to Miltope Corporation as soon as they occur or become aware; and

- c) Follow all requirements set by Miltope Corporation's security policies and regulations when carrying out activities on our premises, or within our facilities.

8. Third Party Information

- a) Respect intellectual property rights and safeguard all third-party information, including that of our customers and collaborators;
- b) Not use information for any purpose (e.g., advertisement, publicity, and the like) other than the business purpose for which the information was provided, unless there is prior authorization from the owner of the information; and
- c) Comply with all applicable laws governing intellectual property rights assertion, including protection against disclosure, patents, copyrights, and trademarks.

9. Personal Information

- a) Protect personal information confidentiality and comply with all applicable data privacy laws and regulations when personal information is collected, stored, processed, transmitted, or shared.

10. Official or Classified Information

- a) Not directly or indirectly disclose, copy, extract, translate, publish, or show official or classified information to any third party in any form whatsoever without prior written authorized permission of Miltope Corporation; and
- b) Comply with all applicable national and international laws and regulations regarding the safeguarding of government official or classified information.

11. Insider Information

- a) Not use any material or non-publicly disclosed information obtained in the course of business relationship with Miltope Corporation as the basis for trading or for enabling others to trade in the stock or securities of any company.

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12. Records

- a) Create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it;
- b) Document all business transactions fully and accurately to represent the transactions or events being documented; and
- c) Retain records based on applicable retention requirements.

13. Monitor and Evaluate

- a) Allow Miltope Corporation, from time to time, to conduct on-site evaluations and inspections at suppliers' facilities, and/or those of their subcontractors supporting our contracts or operations.

14. Whistle Blowing

- a) Be familiar with Miltope Corporation's Ethics Hot-Line (334-613-6304) as well as industry whistle blowing policies and channels; and
- b) Report any wrongdoing, in good faith, without the fear of retaliation through appropriate whistle blowing channels.

V. COMMUNICATION

Should the supplier have any concerns with the requirements of this Supplier Code or suspect that they might be in breach of any of the principles, it is the supplier's responsibility and obligation to proactively inform their assigned Miltope Corporation counterpart.

This Supplier Code will undergo regular review and updates as necessary to ensure its continued relevance and effectiveness.

Access the following links for further information relating to this Supplier Code.

[Supplier Code of Conduct Acknowledgement](#)

[Supplier Quality Manual](#)

VI. REVISION HISTORY

The following table is for historic value and reference only.

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Rev.	Description of Change	Originator	Effective Date
01	Initial Release (Policy)	E. Irmscher	4/7/2025
A	Converted to an SOP	D. O'Donohue	3/19/2026
B	Edited to comply with December 2025 updates from ST Engineering	D. O'Donohue	3/26/2026