

Supplier Code of Conduct

I. Overview

RedViking is committed to conducting business ethically, with integrity, and in compliance with applicable laws and regulations. Our suppliers are critical to our success and our ability to provide superior products and services in a responsible manner. As a vital part of our team, we have the same expectations of our suppliers for ethics and compliance as we have for our employees, officers, and directors.

RedViking understands and expects that our product and service suppliers will have their own internal codes of ethics and conduct. This Code is not intended to be an exhaustive list of all ethical and business conduct requirements to be followed by suppliers. You are responsible for ensuring that your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.

General Disclaimer: The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of your contracts with RedViking. If a contract requirement is more restrictive than this Code, you must comply with the more restrictive contract requirement.

II. Ethics and Compliance Program

Commensurate with the size and nature of your business, you must have management systems, tools, and processes in place that ensure compliance with applicable laws, regulations and the requirements set forth in this Code. Your compliance program must promote an awareness of and commitment to ethical business practices, including, without limitation, the expectations set forth in this Code and facilitate the timely discovery, investigation, disclose (to RedViking and others as appropriate) and implement corrective actions for violations of law, regulations or the expectations set forth in the Code. You must also provide training to your employees on compliance requirements, including the expectations set forth in this Code.

A. Compliance with Laws and Regulations

You are responsible for maintaining full compliance with all federal, state, and local laws and regulations applicable to the operation of your business and your relationship with RedViking.

B. Codes of Conduct and Sub-Tier Suppliers

You shall develop and implement your own code of conduct and management systems to support compliance with laws, regulations, and expectations of this Code. You shall flow down the principles of your code of conduct to entities that provide goods and services to you in support of RedViking, as applicable.

III. Reporting Misconduct

A. Asking Questions or Raising Concerns

At RedViking, we hold ourselves to the highest standards of integrity and ethical behavior. We expect the same from our suppliers. We expect you to provide your employees with access to adequate reporting channels to raise legal or ethical issues or concerns, including without limitation, reports of violation of this Code by you or your business partners, without fear of retaliation, including opportunities for anonymous reporting.

If you observe or suspect any misconduct related to RedViking business undertaken by any RedViking employee, any of your employees or any employee of your business partners, we expect you to promptly notify RedViking. You can contact RedViking compliance at compliance@redviking.com or if you prefer to report anonymously, you may report it using the anonymous reporting link on our website. You must promptly investigate reports of legal or ethical issues or concerns.

B. Non-retaliation

RedViking will not retaliate toward any supplier who, in good faith, asks questions, reports possible violations of this Code, law, or regulation, or participates in an investigation. You must not take any adverse action against anyone who reports conduct that he or she reasonably believes to be illegal or otherwise in violation of this Code. It is a violation of this Code for any employee to be discharged, demoted, suspended, threatened or harassed, or in any way subject to adverse treatment in connection with their employment because he or she reported conduct that he or she believed in good faith to be illegal or in violation of this Code.

IV. Integrity as a Business Partner

A. Anti-Corruption

You will not engage in, or otherwise tolerate, any form of bribery or corruption in its business dealings in full compliance with the U.S. Foreign Corrupt Practices Act (FCPA) and other applicable anti-corruption laws. Conducting business with integrity means never seeking to improperly influence business decisions.

You must not pay a bribe in any amount, to anyone, anywhere, for any reason whatsoever, whether on RedViking's behalf, your behalf, or on behalf of others.

B. Competition on the Merits

You must compete strictly on the basis of the merits of your products and services. You must not engage in any anti-competitive conduct for any reason whatsoever, whether on RedViking's behalf, your behalf, or on behalf of others. You must never rig bids, fix prices, allocate customers or markets, or exchange RedViking's or your competitively sensitive information (e.g., price, cost, or output data) with RedViking's competitors or your competitors.

C. Conflicts of Interest

You must avoid all conflicts of interest or situations giving the appearance of a conflict of interest in your dealings with RedViking. You must report to RedViking any instances involving actual or apparent conflicts of interest between your interests and those of RedViking, such as when one of your employees has a personal relationship with a RedViking employee who can make decisions impacting your business, or when a RedViking employee has an ownership or financial interest in your business.

D. Gift and Business Courtesies

You must never offer, promise, authorize, or provide, directly or indirectly, anything of value with the intent or effect of inducing anyone (including a RedViking customer, RedViking employee, or higher tier or sub-tier supplier) to forego their duties and providing an unfair business advantage to RedViking, you, or others. This includes facilitating payments (e.g., payments to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance).

E. Confidential Information

You must respect the legitimate proprietary rights and intellectual property rights of RedViking and others. You must take proper care to protect sensitive information, including confidential, proprietary and personal information. You should not use such information for any purpose other than the business purpose for which it was provided, unless the owner of the information provided prior authorization.

F. Inside Information

Inside information is defined as material information about a company that is publically disclosed. As a supplier to RedViking, you may have access to such information, including financial information, technical materials or future plans related to RedViking or one of its customers. This information must be kept confidential. You may not use this information as the basis for trading or enabling others to trade in stock or securities of any publically traded company.

G. Accuracy of Records and Submissions

You must maintain books and records that accurately and completely reflect all transactions related to RedViking business and each of your submissions to RedViking, its customers, and regulatory authorities must be accurate and complete. You must never make any entry in your books and records or alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction related to RedViking business.

V. Commitment to Quality and Continuous Improvement

A. Quality

Your products and services must be designed, produced, and delivered with the paramount consideration being the safety and health of your employees and customers. You must have established quality assurance processes to detect, communicate to RedViking, and correct defects to ensure delivery of products and services that meet or exceed contractual quality, legal and regulatory requirements. All required inspection and testing operations must be completed properly by appropriately authorized and qualified individuals, and any required certifications must be completed accurately.

B. Environmental, Health and Safety

You must comply with all applicable environmental, health and safety laws, regulations and directives. You must conduct your operations in a manner that: actively manages risk; conserves natural resources; prevents pollution; safeguards the environment; and minimizes waste, emissions, and energy consumption. You must also assure safe and healthy work environments for your employees and business invitees.

C. Counterfeit Parts

You shall ensure the existence of methods and processes to: minimize the risk of introduction of counterfeit parts into final products; detect counterfeit parts and materials; provide notification to recipients of counterfeit products; and remove any counterfeit parts from the final products.

D. Conflict Minerals

You shall take appropriate steps to determine if any of your products contain conflict minerals. If you determine that any of your products contain conflict minerals, you shall ensure the existence of methods and processes to identify the sources of these conflict minerals and to end use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

E. International Trade Compliance

You must conduct business in strict compliance with all applicable laws and regulations governing the: export, re-export and retransfer of goods, technical data, software and services; the import of goods; economic sanctions and embargoes; and U.S. anti-boycott requirements.

F. Cybersecurity

You must safeguard and protect all information we provide to you and information that you generate or develop in support of our programs from unauthorized access, destruction, use, modification or disclosure. You must have risk-based cybersecurity programs designed to mitigate threats to your information systems, products, services, and supply chain, and to comply with all applicable contractual and legal requirements.

VI. Promote Safe Workplace and Employee Well-being

A. Harassment

You must develop and implement policies and procedures to ensure that employees may perform their work in an environment free from physical, psychological or verbal harassment or intimidation, or any other form of abusive conduct.

B. Non-Discrimination

You must provide your existing and prospective employees and business partners with equal opportunity without regard to race, color, religion, sex, sex stereotyping, pregnancy (which includes pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), gender, gender identity, gender expression, national origin, age, mental or physical disability, ancestry, medical condition, marital status, military or veteran status, citizenship status, sexual orientation, genetic information, or any other protected status of an individual or that individual's associates or relatives.

C. Human Trafficking

You must comply with laws and regulations prohibiting human trafficking. You must not engage in the use of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery or trafficking in persons.

D. Child Labor

You must ensure that child labor is not used in the performance of your work, whether or not related to RedViking business. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

E. Wages and Benefits

You shall pay all workers at least the minimum wage required by the applicable laws and regulations and, at a minimum, provide all legally-mandated benefits. You shall compensate all hourly workers for overtime at the rate required by applicable laws and regulations.

F. Substance Abuse

You shall have policies and procedures in place to ensure that your employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications, whether prescription or non-prescription. You shall implement and enforce policies and procedures that prohibit employees from using, possessing, or selling illegal drugs, alcohol, or misusing medications while performing job functions.

VII. Code Compliance

You will permit RedViking and/or its representatives to assess your compliance with the expectations set forth in this Code in performing work for RedViking, including on-site inspection of facilities and review of associated books, records and other documentation. Upon request, you must provide RedViking with additional information and certifications evidencing compliance.

You must ensure that RedViking has the right to assess your business partners’ compliance with the expectations set forth in this Code in performing work for RedViking, including on-site inspection of facilities and review of associated books, records and other documentation. You must ensure that your business partners will provide RedViking upon request with additional information and certifications evidencing compliance.

In the event of any wrongdoing, you will fully cooperate with any related investigation conducted by RedViking. You will ensure that your business partners also fully cooperate if such investigation involves their performance.

You agree to correct any non-conformances identified during assessments. RedViking does not assume any duty to monitor or ensure compliance with this Code, and you acknowledge and agree that you are solely responsible for full compliance with this Code by your directors, officers, employees, representatives, and business partners.

For questions or concerns about this Code, including its application to specific circumstances in connection with your organization’s performance of work for RedViking, or suspected failures by your organization to satisfy these expectations in performing work for RedViking, You can contact RedViking compliance at

compliance@redviking.com or if you prefer to report anonymously, you may report it using the anonymous reporting link on our website.