

# Shield AI, Inc.

## SUPPLIER CODE OF CONDUCT

*At Shield AI, we stand firmly behind our values that shape and guide us in our daily operations and relationships. These simple yet essential values ensure that we conduct ourselves with the utmost integrity, delivering high quality products while following all applicable laws, regulations, and standards of business conduct, and avoiding even the appearance of impropriety. It's what our customers and shareholders expect. We are committed to meet those expectations, and we in turn trust that all of our suppliers and partners will honor the same values. This Supplier Code of Conduct expresses the expectations we hold for our suppliers and mirrors the standards we set for our own teammates. Thank you for your shared commitment to meeting these principles.*

### **CONFLICTS OF INTEREST**

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Shield AI. We expect our suppliers to report to Shield AI, any situations of potential or apparent conflicts between their personal interests and the interests of Shield AI.

### **EXPORT/IMPORT CONTROL**

We expect our suppliers to ensure that their business practices are in accordance with all applicable laws and regulations governing the export and import of domestic and foreign origin parts and components and related technical data. Suppliers shall provide complete and accurate information and obtain export licenses and/or authorizations when necessary.

### **COUNTERFEIT PARTS**

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, and mark parts obsolete as appropriate.

### **PROTECTING INFORMATION**

Our suppliers should take proper care to protect information, including confidential, proprietary, and personal information. Information maintained on electronic systems should be protected against cyber intrusions and other unauthorized use or access, through appropriate physical and electronic security procedures. Shield AI information should not be used for any purposes beyond the scope of the business arrangement with our company, without prior authorization.

## **HUMAN RIGHTS**

We expect our suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive and ethical culture.

## **HUMAN TRAFFICKING**

We expect our suppliers to not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

## **CHILD LABOR**

We expect our suppliers to ensure that child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

## **NON-DISCRIMINATION**

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment without regard to race, ethnicity, religion, color, sex, pregnancy, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, any characteristic protected by state or local law, or mental or physical disability, when the essential functions of the job can be performed with or without reasonable accommodation.

## **CONFLICT MINERALS**

We expect our suppliers to 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 these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

## **FINANCIAL RESPONSIBILITY/ ACCURATE RECORDS**

We expect our suppliers to accurately record, maintain, and report business documentation, including but not limited to, financial accounts, quality reports, time records, expense reports, resumes and submissions to Shield AI, the customer or regulatory authorities.

## **ENVIRONMENT**

We expect our suppliers to operate in a manner that actively manages risk, conserves natural resources, prevents pollution, and protects the environment. We expect our suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, as well as opportunities for business growth through operational and product stewardship.

## **EMPLOYEE SAFETY & HEALTH**

We expect our suppliers to comply with applicable safety and health laws, regulations, policies, and procedures and to provide for the health, safety, and welfare of their people, visitors, and others who may be affected by their activities.

## **HARASSMENT**

We expect our suppliers to ensure that employees may perform their work in an environment free from physical, psychological and verbal harassment, or other abusive conduct.

## **DRUG-FREE WORKPLACE**

We expect our suppliers to maintain a workplace free from illegal drugs. Such a workplace includes the illegal use, possession, sale or distribution of controlled substances or illegal substances.

## **REPORTING**

We expect our suppliers to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation.

## **SUPPLIER DIVERSITY**

As supply chain requirements vary by country, our suppliers should be mindful that we often have customer-directed supplier inclusion goals that may necessitate use of in-country supply channel providers both by us and our suppliers. These may additionally be defined as small business, small disadvantaged business, woman owned small business, HUBZone certified business, veteran owned small business, service-disabled veteran owned small business, small/medium size business, or aboriginal business.

## **CODES OF CONDUCT & SUB-TIER SUPPLIERS**

Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and expectations related to or addressed expressly within the Supplier Code of Conduct. We encourage our suppliers to implement their own written code of conduct, and to flow down the principles of a code of conduct to the entities that furnish goods and services to the supplier.