

RADIONOR COMMUNICATIONS AS
CODE OF CONDUCT
(version per March 26th, 2025)

1. INTRODUCTION AND APPLICATION

- 1.1 Radionor AS (“Radionor”) is committed to conduct business in a responsible manner. As such, Radionor has high focus on people’s health and safety, protecting the environment, prevent corruption, and apply sound business practices throughout our operations.
- 1.2 This Code of Conduct (in the following referred to as the “CoC”) describes the principles all Radionor Business Partners, including but not limited to suppliers, distributors, agents, resellers, joint venture partners, customers and strategic partners must comply with (in the following referred to collectively as “Business Partners”).
- 1.3 The CoC applies to all individuals and companies with whom Radionor has business relationships, regardless of their nature, type of transactions or duration. This includes companies of all legal types, ownership structures and jurisdictions in which they are incorporated.
- 1.4 This CoC shall be regarded as a contract document and as an integral part of any contract entered between Radionor and the Business Partner in question. In addition to adherence to this CoC, Radionor expects Business Partners to comply with all applicable laws and regulations in the countries of operation, as well as treaties, international standards, and regulations relevant to their business operations. Where differences exist between applicable laws, regulations and this CoC or requirements of the contract with the Business Partner, the Business Partner shall follow the strictest requirements.

2. HUMAN RIGHTS AND LABOUR STANDARDS

- 2.1 Business Partners’ employees shall not be subject to degrading treatment. Employees must be paid, enjoy good working conditions and not be subject to discrimination. All employees must be treated equally, irrespective of gender, religion, ethnicity, sexual orientation, age, disability or pregnancy, union membership, political affiliation, etc. Employees must have safe and healthy working conditions. They must have a legitimate contract of employment, the right to a good standard of living and wellbeing, the right to rest and regular paid holidays, as well as sick leave, without any form of negative sanctions. Wages and social benefits, including maternity leave, shall as a minimum meet national legal standards.
- 2.2 Radionor accepts no form of child labour. The provisions of the International Labour Organisation (ILO) conventions on child labour and children’s rights must be fully complied with. Business Partners must require and ensure that no form of child labour is used anywhere in their value chains.
- 2.3 Radionor accepts no form of forced labour and/or modern slavery in accordance with the definitions provided by the ILO conventions. Radionor believes a work relationship should be chosen freely and free from threats. Business Partners must require and ensure that no form of forced labour is used anywhere in their value chains.
- 2.4 Employees are entitled to organise and must have the opportunity to join a trade union. They must also have the right to strike. Where the law of the country restricts these rights,

the Business Partner must take action to promote them based on human rights principles and the provisions set out in the various conventions.

3. CORRUPTION AND BUSINESS INTEGRITY

- 3.1 The Business Partner shall not offer, promise, or grant any improper benefit, favour or incentive to any public official or international organization. The Business Partner shall not cause or be part of any breach of general or special competition regulations and laws, such as illegal cooperation on pricing or illegal market sharing.
- 3.2 Radionor rejects all forms of corruption. Business Partners must not, for the purpose of obtaining commercial advantage, offer, promise or give Radionor's employees monetary gifts or other considerations.
- 3.3 Business Partners will avoid even the appearance of conflicts of interest in their work with Radionor and will immediately disclose any known family or other close personal relationships with our employees who have an influence over their engagements with Radionor. If Business Partners extend any business courtesies to our employees, they will do so infrequently, and the courtesies must be of no more than moderate value. Business Partners will also accurately reflect their business dealings in their books and records. Business Partners will not offer or accept any form of bribery, corruption, extortion, or embezzlement. Business Partners will not make illegal payments directly or indirectly. Business Partners will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.
- 3.4 Business Partners will uphold the highest standards of ethics to promote honesty and integrity in their business operations.

4. ENVIRONMENT, ENVIRONMENTAL PERMITS AND REPORTING

- 4.1 Measures to protect the environment and manage resources in a responsible manner shall be taken into consideration throughout the production and distribution chain ranging from production to point of sale. The local environment at the Business Partner's production site, as well as regional and global environment, shall not be exploited or degraded by pollution.
- 4.2 The Business Partner shall establish a system for adequate waste management and recycling, and oversee that sub-contractors have such systems.
- 4.3 Business Partners will obtain and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements according to relevant national and international regulations.
- 4.4 Business Partners are encouraged to work to reduce their carbon footprint and implement environmental management system according to ISO 14001 or similar standards.
- 4.5 Throughout their operations, Business Partners will work to reduce consumption of resources, including raw materials, energy, and water through sustainability measures such as e.g. recycling. Business Partners will track, document, and seek to minimize energy consumption and greenhouse gas emissions, and seek ways to improve energy efficiency and use cleaner sources of energy.
- 4.6 Business Partners will identify and manage chemicals and other materials that pose a hazard to the environment, to ensure their safe handling, use, storage, and disposal.

Business Partners will identify, monitor, control, treat, and reduce hazardous air emissions, wastewater, and waste generated from its operations.

- 4.7 All hazardous chemicals warehousing facilities for hazardous chemicals shall consist of a secure and designated area that is clearly identified. The storage facilities must be free of possible leakage. Personnel handling hazardous chemicals must be trained and informed regarding risks related to hazardous materials, given clear and visible instructions regarding waste handling, given equipment to carry out handling of hazardous materials in a safe and proper manner, and be instructed on how to act in the event of accidents and/or emergencies. For products based on animals, due consideration for the animal's welfare shall be ensured throughout the value chain. As a minimum, the Business Partner shall comply with local legislation in this respect.

5. GLOBAL TRADE COMPLIANCE AND IMPORT

- 5.1 Business Partners must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, and technical data in the Business Partners' jurisdiction, as well as any other jurisdiction in which the Business Partner conducts business or operation.

6. EXPORT CONTROL AND SANCTIONS

- 6.1 Business Partners handling products, technology, software or components subject to any export control regulations or applicable sanctions (including, but not limited to Norwegian Export Control Act, EU Dual-Use Regulation, ITAR or EAR) must implement robust internal compliance programs to ensure adherence to licensing, recordkeeping, and reporting requirements. Business Partners shall maintain traceability of such items and cooperate fully with Radionor in any regulatory filings, audits, or investigations.
- 6.2 Business Partners shall establish and maintain an internal compliance program (ICP) appropriate for their role in the supply chain and in accordance with applicable national and international export control standards. The ICP shall include risk assessment, training, screening of transactions and counterparties, and documented processes for the handling of controlled items.
- 6.3 Business Partners must screen all relevant transactions, parties, and end-users against applicable sanctions and denied party lists, and conduct reasonable due diligence to prevent unauthorized end-use or diversion. End-use and end-user certification shall be provided upon request by Radionor or relevant authorities.
- 6.4 Business Partners shall protect all controlled technical data received from Radionor in accordance with applicable export control laws and safeguard it from unauthorized access, reproduction, or transfer. Such data shall only be used for the purpose it was provided for and shall not be disclosed without prior written approval from Radionor and competent authorities.
- 6.5 Business Partners must ensure that their business practices are in accordance with all applicable national laws, directives and regulations governing the export or re-export of parts, components, and technical data in the Business Partners' jurisdiction as well as with other foreign trade controls and/or other trade & economic sanctions or restrictions from Norway, the United States of America, the European Union or from international trade

organizations (including but not limited to those of the European Union or the United Nations).

- 6.6 Business Partners shall not have any ties or connections with groups, individuals, or countries that are subject to any general sanctions on exports, imports, finance, investments, or freezing of assets imposed by the US Treasury Department's Office for Foreign Asset Control (OFAC), the United Nations Security Council, the European Union, HM Revenue and Customs (United Kingdom) or other relevant sanctioning authorities.
- 6.7 Business Partners shall ensure that all of their subcontractors and sub-suppliers involved in the handling, manufacturing, or distribution of Radionor's products comply with the principles of this Code of Conduct, particularly in relation to export control, ethical conduct, and environmental responsibility. Flow-down of obligations shall be documented and traceable.
- 6.8 Business Partners shall implement appropriate technical and organizational measures to protect the confidentiality, integrity, and availability of data and systems used in connection with Radionor's products, in accordance with applicable cybersecurity laws and best practices (e.g., ISO/IEC 27001, NIST SP 800-171). This includes securing information systems against unauthorized access and data breaches and taking precautions to prevent cyberattacks that could impact controlled items or sensitive business information.
- 6.9 Business Partners involved in the handling or resale of controlled defense-related products must ensure that relevant personnel receive regular and documented training in applicable export control, anti-corruption, and compliance obligations.
- 6.10 Business Partners shall retain relevant records relating to compliance with this Code of Conduct, including but not limited to export control documentation, training logs, and due diligence results, for a minimum of five (5) years or longer where required by law, and shall provide such records to Radionor upon request.
- 6.11 Business Partners shall apply and obtain export licenses, permits and/or other consents required, where necessary for the export of Radionor products from their country(ies). No transaction (including import, export or re-export operations of the products) shall be conducted by Business Partners, whether on behalf of Radionor or not, with any denied or restricted entity or individual or any destination country that may be prohibited under the applicable laws, sanctions and regulations of the United States of America, the European Union, or international trade organizations (including but not limited to those of the European Union and the United Nations).
- 6.12 Business Partner must ensure that products, software or technology provided by Radionor is not being used, directly or indirectly, for development, production, maintenance or use of chemical, biological or nuclear weapons, or similar, or any kind of vehicles capable of delivery of such weapons.

7. ETHICAL USE OF TECHNOLOGY

- 7.1 Business Partners shall ensure that its use of technology, particularly in the realm of artificial intelligence (AI) and emerging technologies, are ethical, and shall commit to ensuring that these technologies are used responsibly, upholding privacy, data security, intellectual property rights and avoidance of discriminatory practices. Radionor requires transparency and accountability in the use of AI, expecting our Business Partners to provide clarity about

ethical safeguards in the use of technology.

Given the rapid evolution of technology, our Business Partners shall commit to continuous learning and adaptation, aligning their practices with the highest ethical standards and contributing positively to society, in line with our core values of integrity and respect for human dignity.

8. COOPERATION

8.1 Business Partners will accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation, and performance, in accordance with prevailing industry practices and upon request from Radionor.

8.2 Business Partners will cooperate with any information requests or audits Radionor may initiate to confirm their fulfillment of these responsibilities. Though we seek to work with Business Partners to improve conditions, we may terminate our relationship with any Business Partners that fails to meet these responsibilities.

9. NON-COMPLIANCE

9.1 This CoC sets the standards expected to be met by all of Radionor's Business Partners. If the requirements in this CoC are not met by a Business Partner, the Business Partner and Radionor will openly and in good faith discuss corrective actions. The Business Partner shall do all that is necessary to implement corrective actions as soon as possible and inform Radionor about any such actions.

9.2 If it is determined that a Business Partner is unwilling or unable to carry out corrective actions which Radionor deems necessary to comply with this CoC, or a Business Partner has committed a material breach or repeated breaches of the requirements set forth herein, Radionor is entitled to terminate the business relationship and any agreements with the Business Partner. Such termination shall be effective from the date stated in Radionor's written termination notice.

9.3 Radionor expects that its Business Partners continuously evaluate their compliance with this CoC, and that improvement measures are implemented. Radionor will continuously evaluate and, if needed, improve our own policies and purchasing practices in order to facilitate the Business Partners' compliance with this CoC.