

ROJONE PTY LTD

Supplier Code of Conduct

Commercial & Non-Defence Suppliers

Doc No: GEN-008 | Rev: A

Overview

Rojone Pty Ltd (Rojone) is committed to conducting business ethically, sustainably, and in full compliance with all applicable laws and regulations. This Supplier Code of Conduct (the "Code") sets out the minimum standards that all our suppliers, vendors, contractors, and business partners (collectively "Suppliers") must meet to do business with Rojone.

This edition is addressed to suppliers of commercial and non-defence components, materials, and services. While the requirements here are calibrated for commercial supply relationships, Rojone expects every Supplier to maintain the same standards of ethical conduct, product integrity, and responsible sourcing that underpin our reputation and customer commitments across all markets.

General Disclaimer

The expectations in this Code do not modify the terms and conditions of your contracts with Rojone. Where a contract requirement is more restrictive than this Code, the more restrictive requirement prevails.

Quality

Rojone is committed to delivering quality in everything we do and to continuous improvement. Suppliers are expected to deliver products and services that consistently meet or exceed specified requirements and uphold the highest quality standards throughout manufacturing, inspection, and delivery.

Suppliers must maintain established quality assurance processes to detect, communicate, and correct defects. All inspections and tests must be performed by appropriately qualified individuals, and all required certifications must be completed accurately. Where applicable, Suppliers are expected to comply with ISO 9001.

Ethics and Compliance Program

Rojone requires all Suppliers to have established, effective management systems that support compliance with applicable laws, regulations, and this Code. These systems must include:

- Policies and procedures ensuring ethical behaviour, security, safety, and legal compliance.
- Internal controls, risk management processes, and corrective and preventive action programs.
- Regular compliance training for all relevant employees.
- Clear mechanisms for reporting and addressing violations or unethical conduct.

Suppliers must also demonstrate continuous improvement through regular audits, management reviews, and stakeholder engagement. Suppliers are expected to maintain their own codes of conduct that align with Rojone's standards, and to flow those requirements down through their own supply chains.

Legal and Regulatory Compliance

Suppliers must fully comply with all applicable international, national, and local laws, regulations, and contractual obligations. This includes, but is not limited to:

- Australian Consumer Law and applicable state and territory legislation.
- Work health and safety laws applicable in each jurisdiction where Suppliers operate.
- Environmental protection laws and regulations, including those governing waste, emissions, and hazardous substances.
- Privacy laws, including the Australian Privacy Act 1988 and applicable state equivalents.
- Anti-money laundering and counter-terrorism financing laws.

Suppliers must maintain all required certifications, permits, and licences relevant to their industry and products, and must cooperate with any audits, verifications, or compliance reviews requested by Rojone or relevant authorities.

Supply Chain Transparency and Responsible Sourcing

Rojone is committed to responsible sourcing throughout our supply chain. We expect Suppliers to understand their supply chains and to source materials, components, and services in an ethical, transparent, and consistent manner in accordance with this Code.

2

Supplier Requirements

Suppliers must:

- Disclose to Rojone, upon request, the country of origin for significant components, sub-assemblies, and materials used in products supplied to Rojone.
- Conduct reasonable due diligence on their own supply chains to identify and address risks relating to product quality, ethical sourcing, and regulatory compliance.
- Notify Rojone promptly of any material changes to their supply chain, manufacturing locations, or key sub-suppliers that may affect product quality, compliance, or continuity of supply.
- Cooperate with Rojone's supply chain assessments and provide documentation, declarations, or certifications as reasonably requested.

Prohibited Practices

Suppliers must not:

- Misrepresent, mislabel, or obscure the true country of origin, specification, or composition of any component, material, or product.
- Source materials or components from suppliers known to be involved in unethical practices, including human rights abuses or environmental violations.
- Knowingly supply goods or materials that do not conform to agreed specifications or applicable regulatory requirements.

Counterfeit and Non-Conforming Parts

Suppliers must implement appropriate systems and controls to prevent counterfeit, fraudulent, or non-conforming parts and materials from entering Rojone's supply chain. Product integrity and reliability are fundamental to Rojone's customer commitments.

Suppliers must have processes in place to detect, report, and quarantine counterfeit or suspect parts, and to prevent their re-entry into the supply chain. If counterfeit or suspect materials are identified at any stage, Suppliers must provide prompt written notification to Rojone.

Suppliers sourcing components from distributors, brokers, or non-authorised channels must apply appropriate verification and authentication procedures and must disclose such sourcing practices to Rojone upon request.

Conflict Minerals

Suppliers must ensure that all materials — including minerals and metals — used in the manufacture of products supplied to Rojone are sourced responsibly and do not contribute to conflict financing, human rights abuses, or environmental degradation.

Suppliers must conduct due diligence to ensure that materials such as tin, tungsten, tantalum, and gold (collectively, "3TG") are not sourced from conflict-affected regions, particularly those that fund armed conflict or violate human rights. Sourcing must be from conflict-free smelters and suppliers.

Rojone reserves the right to request evidence of traceability of its conflict minerals supply chain. Suppliers must maintain relevant traceability data for at least five years and provide it to Rojone upon request.

Trade Compliance

Suppliers must comply with all applicable trade laws governing the import and export of goods, materials, and services, including applicable customs, tariff, and import duty requirements. Suppliers must ensure that all goods supplied to Rojone are accurately classified, declared, and documented in accordance with relevant customs regulations.

Suppliers must not engage in any practices that circumvent applicable trade laws, including the false declaration of goods, under-valuation for customs purposes, or the supply of goods in violation of applicable import or export restrictions. Suppliers shall ensure their business practices comply with all applicable economic sanctions and embargo laws relevant to their jurisdiction and operations.

Anti-Corruption and Improper Payments

Suppliers must comply with all applicable laws and regulations governing bribery, corruption, fraud, and other illegal business activities. Suppliers must not offer, request, accept, or receive any undue benefit, service, or incentive to or from government officials, customers, or other third parties for the purpose of obtaining or retaining business, business advantage, or personal benefit.

Suppliers must prohibit their employees from paying, receiving, or promising sums of money or anything of value — directly or indirectly — intended to exert undue influence or improper advantage. Due diligence must be conducted to prevent and detect bribery and corruption in all business relationships.

Conflicts of Interest

Suppliers must avoid situations where personal, financial, or other interests conflict — or appear to conflict — with the best interests of Rojone. This includes relationships with employees, contractors, customers, or competitors that could compromise impartial decision-making. Any potential or actual conflict of interest must be disclosed to Rojone promptly for review.

Human Rights and Labour Practices

Suppliers must uphold and respect the fundamental human rights of all individuals in their workplaces. Specifically, Suppliers must:

- Prohibit discrimination, harassment, abuse, and exploitation of any kind.
- Ensure all employees are treated with dignity, respect, and fairness, irrespective of gender, race, nationality, religion, or any other personal characteristic.
- Comply with local and international labour laws regarding wages, working hours, health and safety, and employee benefits.
- Actively foster a positive working environment that promotes equal opportunity and inclusion for all employees.

Modern Slavery and Human Trafficking

Suppliers must take active steps to prevent any involvement in all forms of modern slavery, including human trafficking and forced, bonded, or indentured labour. All work must be voluntary. Specifically, Suppliers must:

- Provide all employees with a written contract in a language they understand, clearly stating their rights and responsibilities regarding wages, working hours, and other conditions of employment.
- Not destroy, conceal, confiscate, or otherwise deny access to any form of employee identification (such as passports or work permits) as a condition of employment, unless required by applicable law.
- Pay workers at least the minimum wage required by local law and provide all legally mandated benefits. Workers must be compensated for overtime at the legally required premium rate.
- Respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary, and to leave the workplace at the end of their shift.

Whistleblower Protection

Suppliers must establish internal mechanisms that allow employees and third parties to raise concerns or report unethical, illegal, or unsafe behaviour without fear of retaliation. Suppliers must:

- Ensure protection for whistleblowers from harassment, retaliation, or adverse employment consequences.
- Encourage a culture of transparency, where concerns are addressed responsibly and confidentially.
- Cooperate fully with investigations initiated by Rojone or relevant authorities.

Environment, Health, and Safety

Suppliers must comply with all applicable environmental, health, and safety laws and regulations, and strive to minimise their environmental footprint. Obligations include:

- Minimising negative environmental impacts, including waste, emissions, and resource consumption — including reducing carbon emissions and water usage.
- Implementing responsible waste management practices, including proper disposal and recycling.
- Avoiding, where possible, the use of substances or chemicals banned or restricted under environmental regulations such as REACH and RoHS.
- Encouraging innovation and the adoption of cleaner technologies.
- Providing a safe, healthy work environment free from hazards, with appropriate PPE and safety training for all employees.
- Conducting regular risk assessments and implementing corrective measures to address identified workplace hazards.
- Promoting a safety culture where employees can report hazards without fear of retaliation.

Protecting Confidential and Proprietary Information

Suppliers must take all necessary steps to safeguard confidential and proprietary information related to Rojone, including technical data, business operations, pricing, and any other commercially sensitive information. Obligations include:

- Implementing appropriate information security practices, including access controls and secure handling of Rojone's confidential information.
- Ensuring confidential information is shared only with authorised personnel who have a genuine need to know, and that all handling complies with applicable confidentiality agreements and the Australian Privacy Act 1988.
- Ensuring any third parties (including subcontractors and service providers) involved in handling Rojone's confidential information are bound by equivalent confidentiality obligations.
- Notifying Rojone promptly in the event of any actual or suspected breach involving Rojone's confidential information, including the nature and scope of the incident and actions taken to address it.

Consequences for Violating this Code

In the event of a violation of any expectation in this Code, Rojone may pursue corrective action to remedy the situation. If a violation involves a breach of law or regulation, Rojone may be required to report it to the relevant authorities. Rojone reserves the right to terminate its relationship with any Supplier under the terms of the applicable procurement or purchasing contract.

Questions or Concerns?

If you have any questions regarding the content of this Supplier Code of Conduct, please contact us:

Email: sales@rojone.com.au | Phone: 02 9829 1555 | Web: www.rojone.com.au