

ROJONE PTY LTD

Supplier Code of Conduct

Communications Component Suppliers

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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 specifically to suppliers of communications components. Given the nature of this sector—including complex, multi-tier global supply chains, the prevalence of components sourced from or manufactured in higher-risk jurisdictions, and the critical role these products play in defence and secure communications infrastructure—Rojone applies heightened expectations in several areas outlined below.

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.

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 adherence to all defence-specific regulatory frameworks, including but not limited to:

- International Traffic in Arms Regulations (ITAR)
- Export Administration Regulations (EAR)
- Defence Federal Acquisition Regulation Supplement (DFARS)
- Australian Defence Export Controls (ADEC)

Suppliers must maintain all required certifications, permits, and licences, and must support government and customer audits, verifications, and disclosures as required.

Supply Chain Transparency and China-Nexus Risk

The communications component sector presents specific supply chain risks, including exposure to components, sub-assemblies, or intellectual property sourced from or processed through the People's Republic of China (PRC) or other higher-risk jurisdictions. Rojone takes these risks seriously in the context of Australian national security obligations and our obligations to defence and government customers.

Supplier Requirements

Suppliers must:

- Disclose to Rojone, prior to and throughout the supply relationship, any material involvement of PRC-domiciled entities in the manufacture, processing, or design of goods or components supplied to Rojone.
- Identify and disclose the country of origin for all significant components, sub-assemblies, and software embedded in supplied products, to at least two tiers of the supply chain.
- Flag any use of components or technologies sourced from entities listed on relevant restricted-party or entity lists, including the US Commerce Department Entity List, the Bureau of Industry and Security (BIS) Military End-User List, and equivalent Australian or allied-nation control lists.
- Notify Rojone immediately if their supply chain or ownership structure changes in a way that introduces new exposure to PRC-linked entities or other restricted parties.
- Cooperate fully with Rojone's supply chain due diligence assessments, including providing bill-of-materials (BOM) data, supplier declarations, and country-of-origin certifications upon request.

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Prohibited Practices

Suppliers must not:

- Knowingly supply components manufactured by, or containing intellectual property owned by, entities subject to sanctions or export restrictions applicable to Rojone's contracts.
- Re-label, misrepresent, or obscure the true country of origin of any component or product.
- Facilitate the diversion of controlled goods or technology to restricted jurisdictions or end-users.

Note for Communications Component Suppliers

Rojone is aware that many standard telecom components — including RF chipsets, passive components, PCBs, and optical modules — are commonly manufactured in the PRC. Disclosure of PRC-origin content does not automatically disqualify a supplier. However, non-disclosure, misrepresentation, or failure to cooperate with due diligence requests will be treated as a serious breach of this Code.

Counterfeit Parts

Suppliers must implement robust systems and controls to prevent counterfeit parts from entering the supply chain. This is especially critical in the defence and communications sectors, where counterfeit components can compromise the safety, reliability, and integrity of end products.

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

Suppliers sourcing components from brokers, spot-market distributors, or suppliers without direct manufacturer authorisation must apply enhanced testing and authentication procedures and must disclose such sourcing practices to Rojone.

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 conflict mineral supply chain traceability, including, if necessary, down to the mine level. Suppliers must maintain such traceability data for at least 5 years and provide it to Rojone upon request.

Global Trade Compliance

Suppliers must comply with all applicable global trade laws, including those governing the import, export, and re-export of defence and dual-use goods, technologies, and services. Applicable frameworks include, but are not limited to:

- International Traffic in Arms Regulations (ITAR)
- Export Administration Regulations (EAR)
- Customs and Border Protection (CBP) regulations
- EU Dual-Use Export Regulations
- UK Export Control Order

All shipments of controlled goods, materials, or services must be accompanied by the necessary export licences and documentation. Suppliers must ensure exports are not made to embargoed countries or restricted parties, and that their business practices comply with all applicable sanctions, anti-boycott requirements, and economic embargo laws.

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, international organisations, 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 immediately disclosed to Rojone 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, including for veterans and marginalised groups.

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.

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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.

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.

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.

Protecting Sensitive, Confidential and Proprietary Information

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

- Implementing and maintaining robust cybersecurity practices, including regular risk assessments, encryption protocols, and monitoring of access controls.
- Ensuring sensitive information is shared only with authorised personnel, and that all handling complies with applicable confidentiality agreements and laws (including NIST 800-171, GDPR, ITAR, and Australian Privacy Act requirements).
- Ensuring any third parties (including subcontractors and vendors) involved in handling sensitive information are bound by the same confidentiality and security obligations.
- In the event of a breach involving sensitive information, notifying Rojone immediately and providing a detailed report, including the nature and scope of the breach and actions taken to mitigate risk.

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

