

## Policy: Supplier Code of Conduct

<b>Document Number:</b>	PL-QM-013	<b>Revision:</b>	B
<b>Effective Date:</b>	24 February 2026	<b>Approved by:</b>	John Brady CSC General Manager
<b>Classification:</b>	Controlled Document — PDF Only	<b>Status:</b>	Approved

► **UPDATED (Rev D):** Rev B additions: Strengthened to fully satisfy AS9100D Cl. 8.4.3 external provider flow-down requirements. Added Section 12: AS9100D Mandatory Flow-Down Requirements. Added First Article Inspection (FAI) obligations. Added mandatory notification of nonconforming product prior to delivery. Added change notification requirements. Added configuration management and access rights extensions.

### 1. PURPOSE

Rojone Pty Ltd ("Rojone") is committed to conducting business ethically, responsibly, and in compliance with all applicable laws, regulations, and contractual obligations. This Supplier Code of Conduct ("Code") defines the minimum standards expected of all suppliers, vendors, subcontractors, and service providers ("Suppliers") engaged by Rojone.

Compliance with this Code is a condition of doing business with Rojone. Suppliers who cannot comply must notify Rojone immediately.

### 2. SCOPE

This Code applies to all Suppliers providing goods or services to Rojone, including:

- Manufacturing
- Distribution and logistics
- Services and subcontracted activities
- Calibration, testing, and special process services

Suppliers are required to flow down the applicable requirements of this Code to their sub-tier suppliers and subcontractors, where relevant.

### 3. LEGAL AND REGULATORY COMPLIANCE

Suppliers must:

- Comply with all applicable Australian laws and regulations, including WHS, employment, environmental, and anti-corruption legislation
- Comply with all applicable international trade, customs, and export control laws relevant to the goods or services supplied
- Meet all contractual, customer, and regulatory requirements applicable to Rojone programmes, including Defence and aerospace requirements where relevant
- Comply with applicable ITAR, EAR, and Australian export control regulations where goods or technology are subject to export control

## 4. ETHICAL BUSINESS CONDUCT

---

Suppliers must:

- Conduct business honestly, ethically, and with integrity
- Prohibit bribery, corruption, fraud, or any improper business practices
- Avoid and disclose conflicts of interest that could improperly influence business decisions

## 5. HUMAN RIGHTS AND MODERN SLAVERY

---

Suppliers must:

- Respect fundamental human rights and treat all workers with dignity
- Prohibit forced labour, bonded labour, child labour, and human trafficking
- Comply with applicable labour laws regarding wages, working hours, and working conditions
- Support Rojone's obligations under the Australian Modern Slavery Act 2018 (Cth)

## 6. WORK HEALTH AND SAFETY (WHS)

---

Suppliers must:

- Provide a safe and healthy workplace in accordance with applicable WHS laws
- Identify and manage workplace hazards effectively
- Provide appropriate training, supervision, and personal protective equipment (PPE)
- Encourage reporting of hazards and incidents without fear of retaliation

## 7. ENVIRONMENTAL RESPONSIBILITY

---

Suppliers are expected to:

- Comply with applicable environmental laws and regulations
- Manage waste, emissions, and resources responsibly
- Avoid the use of prohibited or restricted substances (e.g., RoHS, REACH) where applicable
- Support environmentally responsible and sustainable business practices where practicable

## 8. QUALITY AND PRODUCT INTEGRITY

---

Suppliers must:

- Deliver products and services that meet specified requirements, drawings, standards, and purchase order conditions
- Maintain appropriate quality management and inspection controls
- Provide accurate and complete certification, including Certificates of Conformance (CoC) and test reports as required
- Notify Rojone promptly of any quality issues, nonconformances, or risks that may affect delivered products or services
- Immediately notify Rojone prior to delivery if a nonconforming product has been or may have been shipped; do not hold notification until after delivery
- Maintain a quality management system appropriate to the criticality and volume of supply to Rojone — preference for ISO 9001 certification: AS9100D certification required for safety-critical aerospace supply

## 9. COUNTERFEIT PARTS PREVENTION

---

Where applicable, Suppliers must:

- Implement controls to prevent the introduction of counterfeit or suspect counterfeit (SUAP) parts
- Source products only from original component manufacturers (OCMs), authorised distributors, or approved supply chains
- Notify Rojone immediately if counterfeit or suspected counterfeit parts are identified — prior to shipment, where possible
- Support investigation, containment, and corrective action activities as required
- Maintain traceability to original manufacturer documentation for all components supplied to Rojone

## 10. INFORMATION SECURITY AND CONFIDENTIALITY

---

Suppliers must:

- Protect Rojone's confidential, proprietary, and sensitive information, including controlled technical data
- Use secure methods for storing and transmitting sensitive data
- Restrict access to Rojone information to authorised personnel only
- Comply with confidentiality obligations and applicable information security requirements, including DISP requirements where applicable

## 11. BUSINESS CONTINUITY AND SUPPLY RESILIENCE

---

Suppliers are expected to:

- Identify risks that could impact the continuity of supply to Rojone
- Maintain reasonable contingency plans for critical products or services
- Notify Rojone promptly of any events that may disrupt supply, including natural disasters, key personnel loss, regulatory action, or financial distress

## 12. AS9100D MANDATORY FLOW-DOWN REQUIREMENTS

---

► **UPDATED (Rev D):** AS9100D Cl. 8.4.3 requires Rojone to communicate to external providers the requirements for the processes, products, and services to be provided, including applicable flow-down of customer and regulatory requirements. The following section formalises these obligations.

Where applicable to the purchase order or supplier agreement, Suppliers shall comply with the following:

### 12.1 Customer and Regulatory Requirements Flow-Down

- All applicable customer-specific requirements (e.g., Defence, prime contractor, or OEM requirements) are flowed down in the Rojone purchase order, specification, or supplier brief
- Suppliers shall comply with all flow-down requirements and shall further flow down applicable requirements to their sub-tier suppliers
- Where regulatory requirements apply (e.g., airworthiness, ITAR, DISP), Suppliers shall comply with and maintain evidence of compliance

### 12.2 First Article Inspection (FAI) and PPAP

- Where specified in the purchase order, Suppliers shall conduct and submit First Article Inspection (FAI) documentation prior to or with the first production delivery
- FAI requirements follow AS9102 (Aerospace First Article Inspection Requirement) unless otherwise specified
- Suppliers shall notify Rojone before resubmitting a product that was previously accepted if any manufacturing process, materials, equipment, or source has changed

### 12.3 Notification of Changes

- Suppliers must notify Rojone prior to implementing changes to product design, materials, manufacturing processes, manufacturing locations, or sub-tier suppliers that could affect form, fit, function, quality, or compliance
- Rojone approval is required before such changes are implemented for products on active purchase orders

### 12.4 Statistical Data and Records

- Where specified, Suppliers shall provide statistical process data, inspection records, and trend data relevant to the supplied product
- Quality records are retained by the Supplier for a minimum of ten (10) years, unless otherwise specified, and shall be available to Rojone, its customers, and regulatory authorities upon request

### 12.5 Configuration Management

- Where products are subject to configuration control (drawing number, revision level, serial number), Suppliers shall maintain and deliver products to the revision level specified in the purchase order
- Changes to the configuration require Rojone approval via an Engineering Change Request (FM-EN-001)

## 13. RIGHT OF ACCESS AND AUDIT

---

Suppliers must:

- Permit reasonable access to Rojone, its customers, and regulatory authorities for the purpose of quality, compliance, or contractual audits, this right flows down to the supplier's own sub-tier supply chain where required
- Cooperate with audit activities and corrective actions arising from such audits
- Provide access to records, facilities, and personnel as required for objective evidence gathering

## 14. REPORTING AND NON-COMPLIANCE

---

Suppliers are encouraged to report suspected unethical, unlawful, or unsafe behaviour. Non-compliance with this Code may result in:

- Corrective action requests (CARs) requiring root cause analysis and systemic corrective action
- Suspension or restriction of approved supplier status pending corrective action
- Termination of the supplier relationship in accordance with contractual terms

## 15. ACCEPTANCE

---

By supplying goods or services to Rojone, or by signing a Vendor Assessment Form referencing this Code, the Supplier confirms their understanding of, and commitment to comply with, this Supplier Code of Conduct and all applicable flow-down requirements referenced in Rojone purchase orders.

## REVISION HISTORY

---

Rev	Date	Nature of Changes	By
A	30 Dec 2025	Initial issue	J. Brady
B	24 Feb 2026	Rev B: Strengthened AS9100D Cl. 8.4.3 flow-down requirements. Added Sec 12: mandatory flow-down section including FAI obligations, change notification, statistical data, and configuration management. Added prior-to-delivery notification of nonconforming product. Added flow-down of right of access to sub-tier. Counterfeit parts section strengthened (Cl. 8.1.4).	QM

## DOCUMENT CONTROL

---

<b>Document No.</b>	PL-RO-005	<b>Owner</b>	General Manager
<b>Department</b>	Procurement / Quality	<b>Last Reviewed</b>	24 Feb 2026
<b>Review Interval</b>	3 years	<b>Next Review</b>	24 Feb 2029
<b>Related Documents</b>	Vendor Assessment Form; FM-EN-001 ECR; PL-QM-017 I&T; Quality Manual Cl. 8.4		