# rk

# **CODE OF CONDUCT FOR BUSINESS PARTNERS**

#### INTRODUCTION

RK Industries, LLC, and each of its subsidiaries and affiliates (collectively "RK") have a long-standing reputation for conducting business in accordance with ethical principles. RK is committed to conducting its business in a responsible manner with integrity and in compliance with all applicable laws. We expect all our suppliers, manufacturers, distributors, vendors, sub-suppliers, subcontractors, consultants, and each of their respective employees/representatives and any other third parties involved with the execution of RK work ("collectively Business Partners") to comply, at a minimum, with the standards of business conduct consistent with those in this Code of Conduct for Business Partners ("Code")

RK reserves the right to modify this Code of Conduct for Business Partners from time to time. Business Partners agree to observe the principles reflected in this Code and ensure they are upheld as part of their management practices.

Acceptance of this Code is a prerequisite for all contractual agreements between RK and its Business Partners.

#### **PRINCIPLES**

- ✓ <u>Integrity and Honesty</u>: Business Partners will conduct their business with integrity, honesty, and in a transparent manner. They will be truthful in all of their dealings with RK and will avoid any form of misrepresentation or deception.
- ✓ <u>Compliance with Laws and Regulations</u>: Business Partners will comply with all applicable laws and regulations, including those related to labor, environmental, anti-corruption, bribery, and human rights.
- ✓ <u>Confidentiality</u>: Business Partners may not use, disclose, or retain any confidential or proprietary information obtained from or through RK, except as allowed by contract provisions. This includes information about company products, services, customers, and employees.
- ✓ <u>Intellectual Property Rights</u>: Business Partner must respect RK's intellectual property rights, including patents, trademarks, and copyrights.
- ✓ <u>Labor Practices</u>: Business Partners will respect the human rights of all of their employees and workers. Business Partners will not engage in any form of discrimination, harassment, any form of forced, bonded, indentured, child, or involuntary labor. RK expects its Business Partners to ensure their employees are paid a fair wage and treated with respect.
- ✓ <u>Health and Safety</u>: Business Partners shall provide a safe and healthy workplace complying with all applicable laws and regulations regarding occupational health and safety.
- ✓ <u>Fair Competition</u>: Business Partners will compete fairly with other Business Partners, and not engage in any anti-competitive practices, such as price fixing, bid rigging, collusion, market allocation, bullying, or retaliation.
- ✓ <u>Environmental Protection</u>: Business Partners will take steps to protect the environment. They will minimize their environmental impact and will comply with all applicable environmental laws and regulations.
- ✓ <u>Logistics and Trade Compliance</u>: Business Partners must implement measures to ensure the responsible procurement of goods and materials and shall comply with sanctions and related requirements as governed by applicable laws and regulations
- ✓ <u>Gifts and Entertainment</u>: Gifts between Business Partners and RK should be infrequent and not substantial in value. Gifts to RK employees that violate RK policies will be returned to Business Partner or handled in a manner that complies with RK's internal policies.
- ✓ <u>Conflicts of Interest</u>: Business Partners performing services for RK are expected to adhere to professional standards and codes governing conflicts of interest related to the services performed. If a potential or actual conflict of interest arises, the Business Partner is responsible to disclose this information to RK Management.



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## ANTI-SLAVERY, HUMAN TRAFFICKING, AND CHILD LABOR

Business Partners shall ensure that all work performed is voluntary. RK does not accept any form of child labor, and all Business Partners shall ensure that there is no use of child labor and shall take the appropriate measures to ensure child labor does not occur at their own place of operation or at their vendors or subcontractor's place of operation.

Business Partners shall not traffic persons or use any form of slave, forced, bonded, indentured or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. Vendors shall ensure that the third-party recruitment agencies they use are compliant with the provisions of this Code and the appropriate laws. Business Partners recruiting foreign contract workers either directly or through third-party agencies shall be responsible for payment of all recruitment-related fees and expenses.

## **RESPONSIBILITIES**

Business Partners are responsible for ensuring that their employees and any third-party workers comply with this Code. Business Partners will have a system in place to monitor compliance and to investigate any allegations of non-compliance. Business Partners are encouraged to report any concerns about compliance with this Code to RK. Reports can be made to RK anonymously. Business Partners will also cooperate with RK in any investigations into potential breaches of this Code.

#### **NON-SOLICITATION**

To maintain a professional and collaborative environment, Business Partners agree not to solicit or recruit each other's employees without prior written consent from a Vice President level or above. This prohibition extends to all forms of solicitation and recruitment, including direct and indirect approaches, for a period of two months following an employee's departure from a Business Partner. This commitment is essential to preserving trust and respect between the organizations and protecting each party's workforce integrity. Violations of this policy will be taken seriously and may result in appropriate corrective actions.

### **ENFORCEMENT**

RK reserves the right to take any action it deems appropriate in the event of a breach of this Code. This may include, but is not limited to, termination of the relationship with the Business Partner, reporting the matter to the appropriate authorities, and seeking damages.

# **ACCEPTANCE**

By entering into a business relationship with RK, Business Partners agree to comply with this Code. Business Partners complying with this Code can help RK to conduct its business in a professional, ethical and responsible manner. Business Partners who do not comply with this Code may be subject to any of the sanctions described above.

Sheph Brita	
Stephan Britz VP of Supply Chain	On behalf of the Business Partner Duly authorized
RK Industries	Print name:
	Date: