



RADIA



RADIA SUPPLIER CODE OF CONDUCT

Radia is committed to conducting business in a lawful, ethical, and sustainable manner. Accordingly, Radia expects its suppliers and business partners to operate with the same approach, with the goal of developing a robust, lawful, ethical, and sustainable supply base. All suppliers of Radia must comply with this Code of Conduct, including ensuring compliance of their own suppliers and business partners, and to notify Radia promptly upon discovering any violation of this Code of Conduct.

HOW WE TREAT PEOPLE

Radia expects its suppliers to treat people with respect, encourage diversity, and protect human rights through the treatment of their employees and undertaking appropriate efforts to identify and mitigate human rights risks.

Suppliers and their subcontractors must:

Anti-Modern Slavery and Human Trafficking

- Actively prevent any involvement of, and not use any labor consisting of, persons who are under indentured servitude, bonded, forced in prison, enslaved, or otherwise constitute involuntary labor.
- Not engage, directly or indirectly, in any human trafficking.
- Employ individuals only on a voluntarily basis, established by a written, legally compliant contract or offer letter in their local language specifying their rights and responsibilities with regard to the basic terms of their employment.

Prevention of Child Labor

- Not use child labor and must implement sufficient mechanisms to verify that the age of workers complies with the minimum working age defined by the International Labor Organization or the minimum legal age for employment where the work is to be performed, whichever is higher. Radia has a zero-tolerance policy regarding the use of child labor.

Freedom of Association

- Respect the lawful rights of their workers to form and join trade unions, bargain collectively, and to engage in peaceful assembly, including the right of workers to choose to refrain from such activities.
- Not engage in coercive activities, including threats and intimidation in the form of physical or legal threats, to prevent such associations.

Non-discrimination

- Foster a diverse and inclusive work environment, including by complying with all applicable laws regarding non-discrimination and committing to principles of equal employment opportunities and non-discrimination with respect to its workforce.

Facility Safety

- Provide safe working environments to their employees on premises that meet or exceed applicable local and international laws and regulations concerning working conditions.
- Establish and maintain a workplace safety plan, which includes assessing and mitigating hazards, providing training to personnel regarding workplace safety, promoting timely reporting and investigation of safety concerns, clearly posting appropriate safety signage, and providing appropriate personal protective equipment where hazards may arise or be present, despite mitigation efforts.

Harassment and Bullying

- Ensure their employees are afforded a workplace that is free from intimidation, physical or psychological harassment, bullying, or other abusive conduct.
- Implement processes that provide opportunities for employees to raise legal, ethical, or workplace concerns without fear of retaliation, including options for anonymous reporting. Any disciplinary processes should include a mechanism for the appeal of disciplinary decisions.

Compensation and Benefits

- Provide compensation and benefits to workers that comply with all applicable wage laws and regulations, including without limitation, minimum wages and overtime hours.
- Not impose financial burdens on their employees related to recruitment costs or make any deductions from employee wages as a disciplinary measure.
- Provide employees with regulated hours of work, daily and weekly rest periods, and annual leave.

HOW WE DO BUSINESS

Suppliers must always act with integrity, transparency, and engage in ethical business practices.

Suppliers and their subcontractors must:

Anti-Corruption, Anti-Kickback, and Anti-Bribery

- Comply with all applicable local laws relating to anti-corruption or anti-bribery.
- Comply with the requirements of the US Foreign Corrupt Practices Act and UK Bribery Act.
- Neither directly nor indirectly offer, give, accept, or receive any payment, benefit, or gift that may be construed as a bribe, kickback, or other improper payment.
- Undertake reasonable diligence to prevent and detect corruption, bribery and kickbacks within their operations.

Gifts and Business Courtesies

- Compete on the basis of merit with respect to their products and services. Gifts and business courtesies must not be used for the purpose of gaining an unfair business advantage. All gifts and business courtesies exchanged must comply with applicable laws and not violate any rules or standards of the recipient's organization. No cash gifts or gifts of cash equivalents should be offered or accepted in relation to business dealings.

Fraud and Deception

- Not engage in fraud, deceptive business practices, or misleading conduct. In the event a supplier determines or discovers that a false or misleading statement or material omission has been made, the supplier must take immediate action to rectify the inaccurate statement and provide accurate information, especially for matters relating to quality, safety, and regulatory compliance of goods and services.

Antitrust and Competition

- Conduct business in accordance with applicable anti-trust laws and regulations.
- Not directly or indirectly enter into any anti-competitive arrangements, whether formal, informal, or implied, including but not limited to those that fix prices, limit supply, bias bids, or exert control over markets.
- Not exchange current, recent, or future pricing information with competitors or participate in any activity that would unlawfully restrain or impact competition.

Conflict of Interest

- Identify and avoid any actual, potential, or perceived conflicts of interest within the scope of their business dealings with Radia and disclose those to Radia promptly upon their discovery.

Counterfeit Parts

- Never utilize counterfeit parts or materials in any products provided to Radia or others.
- Develop and implement effective processes to identify and minimize the risk of supplying counterfeit materials or products.
- Maintain and make available documentation of traceability, inspection, and testing.
- Notify Radia promptly of any suspected counterfeit parts, quarantine any counterfeit materials found, and implement measures to prevent such parts from re-entering its supply chain.

HOW WE DO BUSINESS (CONT'D.)

Suppliers must always act with integrity, transparency, and engage in ethical business practices.

Suppliers and their subcontractors must:

Conflict Minerals

- Undertake appropriate due diligence to ensure the use of only responsibly sourced constituent minerals and to support efforts to eradicate the use of any minerals which, directly or indirectly, benefit groups that perpetuate human rights abuses.

Confidentiality, Intellectual Property, and Privacy

- Ensure that all confidential information, including sensitive and proprietary information, and intellectual property is appropriately protected and respected in accordance with all applicable contractual agreements, as well as all applicable laws and regulations. Confidential information consisting of personal data must be maintained in compliance with all applicable laws relating to such data.

Cybersecurity

- Take steps to understand current threats within the cybersecurity landscape and adopt security standards and principles in accordance with the current National Institute of Standards and Technology (“NIST”) Cybersecurity Framework. If a supplier is unable to achieve the NIST Cybersecurity Framework requirements, then Radia will accept the cybersecurity framework set forth by ISO27001.

Legal Compliance

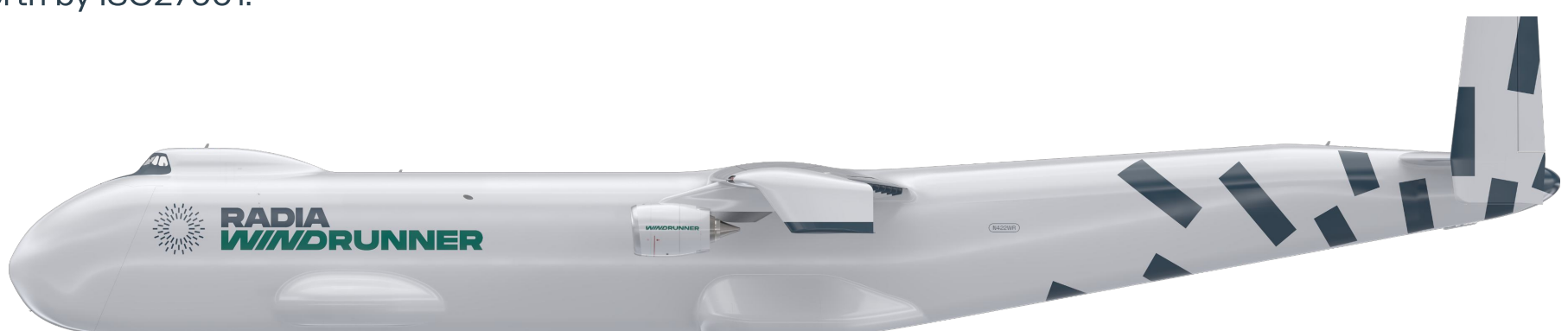
- Comply with all applicable laws and regulations with respect to their operations, including regulations of countries outside the supplier’s primary country of operation when such laws or regulations apply to the products, components, materials, or services provided by or received by such supplier. This includes applicable laws, regulations, and directives governing the import, export, and re-export of materials, parts, components, software, technical data, and services.
- Abide by all applicable embargo or sanction regulations restricting third party access to goods, services, or data.

Record Maintenance

- Accurately and securely maintain business records, not altered, concealed, or misrepresented in any manner. Falsification of such records is strictly prohibited.

Insider Trading

- Not use any material non-public information as a basis for trading or enabling others to trade in public company securities.



HOW WE CARE FOR OUR WORLD

Protecting our environment is a key focus for Radia, so Radia expects Suppliers to mitigate the significant and lasting impacts of climate change and contribute to the renewable energy transition.

Suppliers and their subcontractors must:

Environmental Protection

- Maintain environmental management system that enables the management of environmental performance across key metrics, such as greenhouse gas emissions, water usage, and waste.
- Undertake efforts to improve the efficiency of their energy, water, and natural resource usage and to responsibly manage air emissions and use of hazardous materials.
- Comply with all applicable environmental laws and regulations.

Chemical Transparency/REACH

- Maintain awareness of emerging global chemical regulations and ensure compliance with any such regulations.
- Engage transparently with Radia concerning the chemical composition of any product supplied, or intended to be supplied, to Radia.
- Provide written notice and disclosure to Radia, as promptly as possible and in all cases prior to the delivery of goods, with sufficient information of any products, components, or materials containing substances regulated, controlled, or specified by the Registration, Evaluation, Authorization, and Restriction of Chemicals (“REACH”) requirements provided by the European Chemical Agency.



CONTACT INFORMATION

This Code of Conduct is intended to supplement, rather than replace, any requirements set forth in contracts between Radia and its suppliers. In the event of any conflict between this Code of Conduct and a contract, the terms of the contract shall prevail. This Code of Conduct may be updated from time to time by Radia. Any questions about this Code of Conduct may be directed to notice@radia.com.

Any known or suspected violations of this Code of Conduct should be submitted in writing to the General Counsel of Radia at notice@radia.com.

Thank you for being committed to the principles set forth in this Code of Conduct and partnering with Radia.

