

ARKA Group, L.P. Supplier Code of Conduct

ARKA Group, L.P.'s ("ARKA") commitment to conduct business honestly, ethically, and in compliance with legal and regulatory requirements remains constant. We expect the same from our suppliers. Suppliers must comply with all applicable laws and regulations and adhere to the following:

Anti-Corruption, Gifts and Entertainment

Suppliers must fully comply with all applicable anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act). Suppliers shall not offer, pay, or accept gifts, hospitality, cash, donations, employment, fees, commissions, facilitating payments, or anything of value to obtain inappropriate business advantages. Complying with anti-corruption laws also requires suppliers to know their customers and partners, diligently record expenditures, and keep accurate books and records.

Confidentiality, Data Privacy and Protection of ARKA Assets

Suppliers must protect ARKA confidential and proprietary information and intellectual property, safeguard ARKA and ARKA customer property and adhere to data privacy regulations. ARKA's confidential and proprietary information and intellectual property are our most treasured assets. We expect our Suppliers to implement and maintain information security programs to protect valuable business and personal data. Suppliers must immediately notify ARKA of any compromise or loss of ARKA information, data or property.

Conflicts of Interest

Suppliers must avoid potential and actual conflicts of interest in their dealings with ARKA, our employees, and our customers. Suppliers must not offer ARKA employees any gifts, meals or hospitality that are frequent, lavish, extravagant or otherwise inappropriate or illegal. Suppliers should proactively disclose any potential conflicts of interest between any personal interests and the interests of ARKA so that we may take appropriate action to resolve the issue.

Employment, Human Trafficking & Child Labor

Suppliers must prohibit forced or child labor at every tier of their supply chains. Suppliers may not engage in any form of physical violence, threats, mental or verbal abuse or bullying against their employees or others. ARKA expects its suppliers to treat their employees and others with respect. Suppliers must follow local, state and federal laws regarding employment, minimum wage, maximum work hours, overtime, and benefits.

Environmental Health and Safety (EHS)

Suppliers must comply with EHS laws and regulations. Suppliers should mitigate their environmental impact and reduce the waste of natural resources in their operations. Suppliers and their supply chains must comply with applicable laws and regulations on the use, handling, and disposal of hazardous waste, persistent pollutants, and other toxins. ARKA expects Suppliers to implement sound health and safety practices across their business operations to minimize risk, prevent accidents, and ensure a safe workplace for all employees.

Inclusion and Diversity

Suppliers must provide equal opportunity employment and shall not engage in any form of illegal discrimination in hiring and employment practices and supply chain selections. Suppliers should foster an inclusive workplace culture and promote small and underrepresented businesses.

Pricing

Suppliers must be transparent and honest with pricing. Supplier prices must be fair, reasonable, accurate, and adequately supported.

Product Integrity

Suppliers shall implement and maintain appropriate counterfeit parts prevention, avoidance, and detection systems, processes, and controls to minimize the risk of introducing counterfeit parts into ARKA products. Suppliers shall ensure that persons are aware of:

- their contribution to product or service conformity;
- their contribution to product safety;
- the importance of ethical behavior.

Sanctions, Embargoes, and Trade Compliance

Suppliers must strictly follow applicable export and import laws, allow only US Persons or other authorized individuals to access export-controlled ARKA products and technology, prohibit transactions with sanctioned and embargoed countries and persons, and comply with anti-boycott reporting requirements.

Violations

Suppliers must promptly report any actual or potential violations of this Code or other unlawful conduct that relates to its business dealings with ARKA or its employees. Actual or potential violations should be reported directly to ARKA's Chief Legal Officer at amonk@arka.org.

ARKA will evaluate a supplier's compliance with this Code during the supplier evaluation, selection, or onboarding process and throughout the supplier's relationship with ARKA. If a supplier violates this Code, ARKA at its discretion may provide the supplier with a reasonable opportunity to remedy the issue. If a supplier engages in unlawful conduct, ARKA may suspend or terminate its relationship with the supplier and may also disclose the matter to the appropriate authorities.