

# Code of Ethics and Conduct

#### MISSION STATEMENT

To protect our customers' most valued resources (Our Warfighter) by delivering superior products, services, and solutions tailored to ensure the success of their missions.

On time + On budget = On-Point!

Never Tomorrow, Today!

We shall achieve this for our business by implementing a strict Code of Conduct and Ethics, which will be met or surpass our competitive market.

The ON-POINT DEFENSE TECHNOLOGIES name and brand has become one of our greatest assets, along with each employee of the company. We have built our brand and solid reputation throughout the Defense Industry delivering outstanding products and by acting according to uncompromisingly high ethical standards. Now, each one of us shares the responsibility to protect our brand in their daily activities.

This is the reason why our Code of Conduct is so critically important. The actions we take and the decisions we make every day tell the world who we are.

#### This Code of Conduct defines:

Our Values
Our Ethics Principles
Our Compliance Principles

It applies to each of us, permanent or temporary, regardless of our level of position. Whenever we encounter an ethical issue, each of us has the responsibility to respond in a way that reflects our Code of Conduct. We have the responsibility to speak up when we see any behavior that we believe does not live up to our values, with no retaliation for raising a concern or making a report in good faith. With this regards the relevant speak-up procedure shall be applied.

Thank you for taking the time to read this Code of Conduct, which is part of the foundation of our success.

Should you have any questions don't hesitate to speak with your manager.

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# **OUR VALUES**

#### **Global Team Spirit**

We value individual and collective commitment, loyalty, and honesty in full respect of local cultures and people.

#### How this value translates into action

On-Point Defense Technologies (OPDT) is committed to developing mutual support and trust at every level in the company. As a global team, we respect one another and value the contribution of each employee.

- We encourage employees to express themselves freely to enhance their work activities
- We foster communication across all functions and at every level – locally, nationally, and globally –, and encourage you to share your experience, knowledge, successes, and insights to support our growth.
- We expect everyone to play as a team and to support their colleagues for the benefit of our customers and for the collective success of the Group

#### **Excellence**

We deliver outstanding results building on continuous creativity, reliability, and efficiency.

#### How this value translates into action

OPDT Excellence is not just a value, it is our daily objective.

- We deliver performance and respond quickly.
- We strive to use the resources made available for professional activities in the best interests of the company.
- We measure ourselves to the highest performance standards and continuously strive to use the most efficient practices for the benefit of our customers.
- We seek out and suggest ways of improving our individual activities and the organization overall, and alert management appropriately.

This translates into the OPDT Quality System, which ensures the consistency, the quality and the continuous improvement of our services to customers.

#### **Customer Focus**

We strive for our customers' satisfaction by delivering tailor- made solutions for their most critical quality challenges.

#### How this value translates into action

- We use our extensive experience and our quest for excellence to provide high-end tailor-made quality products in building long lasting partnerships with our customer(s).
- We attentively listen to and analyze our customers' requests and search for the most suitable solution to address their needs.

 We show professionalism and impeccable behavior, allowing us to guarantee the quality of our services and to earn the trust of our customers, including complex situations which involve thirdparties.

#### Initiative

We trust in courageous and innovative people, Leaders and trustworthy professionals that take responsibility for their actions.

#### How this value translates into action

We want our employees to embody the initiative spirit by:

- Encouraging them to propose new ideas, to improve current processes to their managers.
- Creating the right conditions for them to proactively provide innovative and value added solutions.
- We are convinced that each one of us can bring added value.

# **Our Ethic Principles**

Our ethics principles are designed to help our people to understand what we believe in and which behaviors are appropriate.

#### Integrity

Integrity is a key prerequisite for our company and ensures we show respect for our colleagues, suppliers, and customers. It implies that each of us can rely on and trust each other.

#### **Fairness**

We show fairness and honesty in all that we do. To build solid relationships with our customer(s), suppliers, and partners we communicate with one another in a fair, honest, and open manner.

#### Respect

We show respect for others. This means respecting the rights of individuals, treating them with dignity and being mindful of cultural differences. Building on a variety of cultures and points of views can bring more value. It also implies that we strongly reprehend discrimination.

#### **Fighting Harassment**

Moral or sexual harassment is characterized by repeated hostile conduct, verbal comments and actions that impugn the employee's dignity and integrity. Any form of abuse, harassment, or bullying is strongly prohibited. Therefore, any misconduct could cause disciplinary actions leading to a sanction.

#### **Fighting Corruption**

We ban any form of bribery or influence peddling. On this basis, we make sure that OPDT resources & goods are never used for corruption purposes. We do not request or accept any advantage, of any third party, with the goal of directly or indirectly promoting its activities. It can be any type of benefit, promised or given in an inappropriate manner. Increased vigilance must be shown in case of behaviors and situations that could lead to bribery matters, as follows:

- Gifting
- Sponsorship

#### **Gifting**

We refuse and we do not solicit any gifts, favors, invitations, or any benefit, from individuals or organizations with which an employee has had business relations with, and which might influence the impartiality with which the employee performs their work, or which might constitute a reward related to the employee's activities. This also includes any gift in cash or with a value exchangeable for cash. In business dealings, employees shall not provide or offer to provide any gratuity, favor or other benefit or engage in any other activity which could improperly influence, or be reasonably interpreted as improperly influencing their decision or activities.

#### **Sponsorship**

The financial or material support brought via the sponsoring with the purpose to support general interest or sporting activities shall be strictly supervised. We ensure that the entity supported has an activity which is compliant with our ethical principles. OPDT refrains to lead actions of sponsoring in which our employees or a third party with whom the Group has business connections with, has, directly or indirectly, a financial or material personal interest.

#### Confidentiality

Our Group respects and protects confidential information trusted by customers and any third parties in the course of business and takes appropriate measures to prevent accidental disclosure.

Each of us shall maintain the confidentiality of OPDT suppliers and customers, in compliance with applicable internal rules and the General Data Protection Regulation (GDPR).

Each of us shall therefore not disclose nor discuss any sensitive information regarding OPDT financial performance, investment, strategies, plans and/or partners.

This obligation continues after the end of the employment relationship. Any disclosure of confidential information likely to prejudice the development of OPDT, constitutes serious professional misconduct and will be subject to the appropriate sanctions. OPDT reserves the right to take legal action against anyone contravening this provision.

## **Code of Conduct**

We prohibit any form of harassment and corruption. The purpose of this Code of Conduct is also to define and explain further what type of behaviors shall be punished.

#### **Legislation and Regulations**

We act in compliance with legislation and regulations and observe in all circumstances the national and international laws and regulations as well as the rules of professional conduct related to our activities.

OPDT is committed to promoting and enforcing the labor standards established by the laws and conventions of the United States of America.

#### In particular, it implies:

- Making a positive contribution in communities where we operate.
- Striving for the abolition of child and forced labor.
- Pledging to respect human and labor rights in all countries where we operate, thus including countries where these rights are insufficiently protected.

# This also means that we act as a good corporate citizen wherever we operate:

- Abiding by tax legislation and paying local & national taxes that may be due.
- Making sure that all accounts are fully and correctly completed, with all the supporting documents.

#### Safety

Each one of us shall abide by the local OPDT internal rules & guidelines in terms of safety as well as by the client's safety rules.

#### **Environment and Social**

Each one of us shall comply with the local, state & Federal policies in terms of environmental protection, as we all are responsible for the reduction of negative impacts of our activities in the environment.

Appropriate optimization of working conditions for all employees of OPDT, is also key in our day-to-day work.

#### **Use of IT Resources**

When using the company's information, IT and telecommunication systems as part of our professional activities, functions, and assignments, we abide by the internal regulations.

#### Communications

We respect the OPDT basic communication principles in all our communications, as an individual OPDT employee or as a company.

- Avoiding speaking or writing on behalf of the Group without expressed authorization.
- Avoiding speaking or writing about subjects outside our field of expertise.
- Ensuring no confusion between personal opinions and that of the Business.

### Signature of Approval and Release:

Keith Driver, President

John Diesel, Director of Operations

Barry Blackmon, Director of Business Development

11/28/2023

Date

