

Supplier Code of Conduct

Introduction

Orion Systems Integrators, LLC and its subsidiaries and affiliates globally (collectively, Orion, we, our or us) are committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible, ethical operations. We expect our suppliers and their suppliers to support the following social, environmental, and ethical responsibilities. In addition, suppliers must comply with all applicable laws, rules, regulations, directives and guidelines, and all obligations in any contract they have with us.

Suppliers will cooperate with any information requests or audits to confirm their fulfillment of these responsibilities. Suppliers will accurately disclose information about their business activities, labor, health and safety, environmental practices, financial situation and performance in accordance with prevailing industry practices. We seek to work with suppliers to improve conditions, and we may terminate our relationship if a supplier fails to meet these responsibilities.

Respect for the Individual

Everyone deserves to work in an environment where they are treated with dignity and respect. Orion is an equal opportunity employer and is committed to providing a workplace that is free of discrimination of all types and abusive, offensive or harassing behavior.

Human Rights and Equal Opportunity

Orion supports and respects the principles set out in the Universal Declaration of Human Rights. Orion does not discriminate based on race, color, sex, sexual orientation, gender, gender identity, gender expression, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, disability, age, genetic information, medical condition, union membership, covered veteran status, or body art. We are committed to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers, including direct, contract, temporary and student employees, and any other type of worker. As a result, suppliers must manage their workforce to achieve the following:

Wages. Suppliers will pay legally-mandated wages and benefits, will comply with the law regarding wage deductions, and will provide workers with the basis on which workers are paid via pay stub or similar documentation. Suppliers are expected not to deduct from wages as a disciplinary measure.

Working Hours. Except in emergency or unusual situations, for suppliers' workers paid hourly, workweeks are expected not to exceed the maximum according to applicable local law.

Freely Chosen Employment and Combating Modern Slavery. Suppliers will not use or permit any form of forced, bonded, or indentured labor. All work must be voluntary. All workers must be

free to terminate their employment at any time. Suppliers will not withhold workers' identity, passport, immigration, or work permit documents at any time. Suppliers are expected not to require workers to pay recruitment fees or other fees for their employment, either directly or through third parties, and are expected to repay any worker that has paid such fees. Suppliers will not unreasonably restrict workers' freedom to move into, out of, or at work facilities. As part of the hiring process, suppliers are expected to give each worker a written agreement describing the worker's terms of employment in a language understood by the worker, and, if internationally relocating, the written agreement will be provided before they leave their country of origin.

No Child Labor. Suppliers will not use child labor. "Child" means any person under age 15, under the age for completing compulsory education, or under the minimum age for employment in their country, whichever is greatest. Workers under the age of 18 will not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers may use legitimate apprenticeship programs such as student internships. Suppliers are expected to pay student interns at least the same wage rates as other entry-level workers performing equal or similar tasks, unless expressly specified otherwise by applicable local law.

Fair Treatment, No Discrimination and Diversity and Inclusion. Suppliers will not permit harassment, abuse, corporal punishment, or inhumane treatment. Suppliers will not subject workers or potential workers to unlawful medical tests or physical exams. Suppliers will not discriminate in screening, hiring, or employment practices based on race, color, sex, sexual orientation, gender, gender identity, gender expression, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, disability, age, genetic information, medical condition, union membership, covered veteran status, or body art. Workers' religious practices will be reasonably accommodated. Suppliers will not inquire about potential workers' criminal histories on employment applications or before initial interviews, or, if no interview is conducted, before making conditional offers of employment. Suppliers will demonstrate a commitment to identify, measure, and improve a culture of diversity and inclusion.

Freedom of Association. Workers will be permitted to associate freely, bargain collectively, and seek representation in accordance with applicable local laws. Suppliers are expected to permit workers to openly communicate and share grievances with management about working conditions without fear of reprisal or harassment.

Work Environment

Suppliers will provide a healthy and safe working environment for employees in accordance with international standards and local laws. Workplace and housing facilities shall be safe and without risk to health, have tolerable temperature and noise level, adequate ventilation, sufficient lighting, clean toilet facilities, and drinking water. Occupational health and safety practices shall comply with applicable laws and aim to provide the best working environment possible to help employees be productive and maximize their skills. If suppliers provide workers with residential facilities, those facilities will be clean and safe.

Business Ethics

Orion values its reputation, complies with its obligations, and observes all applicable acting laws, norms of ethics, and rules of fair business. Accordingly, suppliers will uphold the highest standards of ethics to promote honesty and integrity in business operations, including:

Business Integrity. Suppliers will avoid even the appearance of conflicts of interest in their work with us. Suppliers will immediately disclose any known family or other close personal relationships with our employees who have an influence over their engagements with us. Any business courtesies by suppliers to our employees will be infrequent and of no more than moderate value. Suppliers will accurately reflect their business dealings in their books and records.

No Bribery or Corruption. Suppliers will not offer or accept any form of bribery, corruption, extortion, or embezzlement. Suppliers will not make illegal payments directly or indirectly. Suppliers will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

Intellectual Property Rights. Suppliers will respect intellectual property rights and will conduct technology and know-how transfers in a manner protecting intellectual property rights.

Responsible Materials Sourcing. Suppliers that are manufacturers will maintain a policy reasonably assuring that any tantalum, tin, tungsten and gold in products they manufacture do not directly or indirectly benefit armed groups that commit human rights abuses in or near the Democratic Republic of the Congo.

Privacy and Information Security

Suppliers will comply with all applicable local and international privacy and information security requirements. Suppliers will protect the privacy of personal information of everyone with whom they do business, including workers, suppliers, customers and consumers. Suppliers will not disclose confidential and non-public information without a valid business purpose and proper consent.

Environmental Responsibility

Orion supports a proactive approach towards environmental issues and undertakes initiatives to promote greater environmental responsibility. Orion encourages the development and diffusion of environmentally friendly technologies. Suppliers will act in accordance with local and international environmental laws where applicable.

Suppliers will strive to minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of the public. Suppliers will obtain and keep current all required environmental permits, approvals, and registrations, and follow their

operational and reporting requirements. Suppliers will work to reduce consumption of resources, including raw materials, energy, and water. Suppliers will seek to minimize energy consumption and greenhouse gas emissions, and seek ways to improve energy efficiency and use cleaner sources of energy. Suppliers will identify and manage chemicals and other materials that pose a hazard to the environment. Suppliers will identify, monitor, control, treat, and reduce hazardous air emissions, wastewater and waste generated from their operations.

Supplier Management System

Suppliers are expected to adopt or establish a management system to carry out these responsibilities. The management system will be designed to ensure that suppliers' operations comply with these responsibilities and applicable laws and regulations; identify and mitigate operational risks related to these responsibilities; and facilitate continuous improvement.