



NORAD CODE OF CONDUCT

Message from NORAD Management

Our commitment to ethical behaviour and the solid ethical foundations are one of the most essential components of NORAD operation. We are committed to doing business the right way, based on a culture of ethics and compliance.

In the long term, we can successfully face the challenges of competitive market environment by accepting the imperatives of moral responsibility, both as individuals and as a company. In performing the job duties, the employees should always act lawfully, ethically and in the best interests of NORAD.

Thank you for upholding our values and helping us doing things right. It does not only mean that we provide competitively priced and quality services, but it also means that ethics and integrity is always born in mind. We actively source materials and services from suppliers who share these same views, and we monitor our entire operation for compliance with our Code.

Michael Miranda, President & CEO

Introduction

This CODE OF ETHICS AND BUSINESS CONDUCT of NORAD serves as our ethical commitment and as a guide to proper business conduct for all our stakeholders. We, at NORAD are committed to doing business legally, ethically and in a transparent manner.

This document applies to all staff who work for NORAD, and also includes other organizations who do business with us.

NORAD expects its staff to be impartial and honest in all affairs relating to their job. All staff bear a responsibility in general, to be of good faith and do nothing to destroy the trust necessary for employment.

The success of our business is based on the trust we earn from our employees, customers, and shareholders. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct. All staff are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty, and fairness.

NORAD is open to any questions at any time and will not allow punishment or retaliation against anyone for reporting a misconduct in good faith.

Managers and leaders have higher responsibility for demonstrating, also through their actions, the importance of this Code. Managers and leaders are responsible for promptly addressing every raised ethical question or concern. Employees must cooperate in investigations of potential or alleged misconduct.

Non-compliance to this Code considered as a misconduct that could warrant disciplinary action, including termination of employment or other contract in deserving cases.

We are committed to making efforts to apply our values and norms also throughout the entire value chain of our own suppliers, sub-contractors, service providers and business partners.



Our core values at NORAD are:

- Honesty
- Integrity
- Trustworthiness
- Respect for others
- Responsibility
- Accountability
- Reliability
- Obedience to the law

Ethical Decision-making

Ethical conduct is a value-driven decision-making. Some key questions can help to identify situations that may be unethical, inappropriate, or illegal.

Ask yourself:

Is what I am doing legal? • Does it reflect our company values and ethics? • Does it comply with the Code and company rules/policies? • Does it respect the rights of others? • How would it look if it made the news headlines? • Am I being loyal to my family, my company and myself? • Is this the right thing to do? • What would I tell my child to do? • Have I been asked to misrepresent information or deviate from normal procedure?

Compliance with laws and regulations

Our commitment to integrity begins with complying with laws, rules, and regulations. We understand and comply with the legal requirements and commercial practices of lawful business.

We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

Our staff must follow applicable laws and regulations, always including the Code and must ensure compliant operations.

Sustainability: People + Profit + Planet

We are committed to meet current requirements without compromising the needs of future generations. To this, we combine economic, environmental, and social factors in our operation and our business decisions. For further details, please see our Environmental Policy.

Human rights

We are committed to respect human dignity and rights of everyone and community whom we interact with during work. We shall not, in any way, cause or contribute to the violation of human rights. Our staff shall treat everybody with dignity, respect and care and uphold human rights.



Fair labor practices and working conditions

We are committed to promote equality in our employment practices and to fair employment and remuneration policy in compliance with applicable laws. We are firmly opposed to employ or contract child or slave labor or any form of forced or compulsory or bonded labor. We condemn all forms of illegal, unfair, unethical labor practice that exploits workforce, destroys social security, could be considered slavery, or serves as tax evasion, including but not limited to undeclared and “grey” work or holding back wages.

NORAD commits to respect and protect the right of all employees to freedom of association, collective bargaining, the right to organize and to engage in workers’ representation. NORAD respects the right of employees to engage in collective bargaining with respect to matters such as: Health and safety, remuneration, working hours, training and career development, work-time flexibility, life-long learning, stress management and equal opportunities. NORAD abides by all applicable national and state laws relating to the recognition of trade unions.

NORAD follows state and federal laws applicable to wages, benefits, ethical recruiting, and working hours. Employees are to be compensated for any overtime they have worked, medical leaves are respected, and benefits are provided to full time employees.

Our staff shall act with integrity and treat their colleagues and others through the work with full respect.

Discrimination and harassment

We provide equal opportunity in employment, and we do not tolerate any discrimination or harassment or any type from abuse. No direct or indirect discrimination shall take place based on any professionally non-relevant trait or circumstance, such as: gender, marital status, age, national or social or ethnic origin, color, religion and political opinion, disability, sexual orientation, employee representation, property, birth, or other status. Any kind of discriminatory behaviour, harassment, bullying, or victimization is prohibited.

All staff is expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behaviour that could be taken as offensive, intimidating, humiliating, malicious or insulting.

Health, Safety and Environment

We provide clean, safe, and healthy work conditions and we are dedicated to maintaining a healthy environment. We are committed to minimize the impact on the natural environment of our operations. We make efforts to reduce the use of finite resources, like energy or water, and the harmful emissions, like waste. NORAD recognizes the rights of indigenous and minority people and respects federal and local laws. We will not force anyone from their land and will respect rights to land, forest, and water.

All staff must follow and comply with every relevant health, safety and environmental protection laws, regulations and rules all times. Please see separate safety manual and environmental policy for further information.

Fair competition and business conduct

Our relationships with business partners are built on trust and mutual benefits compliant with competition law. We are dedicated to ethical and fair competition, as we sell products and services based on their quality, functionality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular customers. We commit to comply with all applicable trade controls, restrictions, sanctions, and import-export embargos.



NORAD does not tolerate any unfair business practice. We refrain from damaging competition and the reputation of any business partners, and any behaviour that harms competitor's creditability.

We do not hold back maliciously, unlawfully, or unduly payments towards our partners, and we do not allow such practices in our supply chain, we fight the unethical practice of "debt chain".

Our staff is responsible for ensuring fair business during their job and adhere to every competition, consumer protection and fair marketing rule. Customers and business partners shall be treated fairly and equally, products and services shall be displayed in a manner that is fair and accurate (fair marketing and advertising), and that discloses all relevant information.

Anti-corruption

We firmly condemn and do not tolerate all forms of corruption including, but not limited to bribery, and extortion. It is prohibited directly or indirectly offering, promising, giving, asking, soliciting, or accepting any unfair advantage or benefit, in order to obtain, retain or facilitate in any way the business. An unfair advantage or benefit may include cash, any cash equivalent (e.g., voucher), gift, credit, discount, travel, personal advantage, accommodation, or services. We do not permit facilitation (or "grease") payments to government officials or private business in order to secure or speed up routine actions. Corruption also covers the misuse of function or position as well, when someone makes that false appearance that s/he improperly influences a decision maker.

Corruption for either to obtain or retain business, or to obtain or retain an advantage in the conduct of business is considered gross misconduct. Similarly accepting or allowing another person to accept a bribe is considered gross misconduct. Our staff has to account for all benefits received in the course of doing business and must not give or receive bribes or otherwise act corruptly.

Gifts and Hospitality

We shall avoid any actions that create a perception that favourable treatment was sought, received, or given in exchange for personal benefits. We will neither give nor accept any benefits that could reasonably be perceived as bribery, attempts to influence, or be influenced. Our staff may never use personal funds or resources to do something that cannot be done with our resources.

We may accept and offer occasional gifts and hospitality that are customary and conform to reasonable ethical practices of the market, provided that they are not inappropriately excessive, not frequent and do not reflect a pattern of frequent acceptance, does not create the appearance of an attempt to influence business decisions. Only trivial gifts with low value can be accepted. All other gifts must be politely refused or, if received through post, returned to the donor. If return is not possible it shall be offered for charity or community purposes. It is the responsibility of the person offering, providing, receiving, or accepting the gift to decide whether the gift is appropriate.

Security

We are responsible for the security, protection and for the economic use of company resources. Our resources, including time, material, equipment, and information are provided for legitimate business use only.

NORAD is secured digitally by an internal IT department as well as physical security guards at points of entrance to the property. Our main entrance is staffed by Rhode Island state guards during primary business hours (Monday-Friday 8:00AM-4:00PM excluding federal holidays). All other guard shacks are staffed by NORAD or third-party security services when the state guards are not on duty. NORAD and third-party



guards are to be alert, diligent, and not be under the influence of any substance. All staff should follow company procedure regarding person(s) entering or leaving the property. This is including but not limited to: scanning ID's, scanning out cars and documenting vehicle VINs leaving the property. They should ensure that all company property, including the property of our business partners, is protected. Local law enforcement is to be contacted if there is violation of these policies.

All staff is obligated to follow appropriate security measures and they should treat company property, whether material or intangible, with respect and shouldn't misuse company assets or use it carelessly.

Confidentiality, information security, proprietary information, and intellectual property

We are committed to business information confidentiality, integrity, and accessibility, we implement proper technical security measures this and it is our staff's obligation to uphold this. Proprietary information includes all non-public information that might be harmful to the company or its customers, business partners if disclosed to unauthorized parties. All staff must handle any such information as secret. It also covers that, no one is entitled to trade with securities while in possession of non-public information or deliver non-public information to others that could have impact on the securities. Every rule ensuring information security must be followed all times.

We respect the property rights of others. NORAD recognizes our employee's intellectual property rights according to local and federal law. NORAD will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

Bookkeeping, true reporting and financial integrity

Our books, records, accounts, and financial statements must be maintained in appropriate detail, must truly and accurately reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.

We commit ourselves to fair taxation and to avoid all tax evasion practices, including such as failing to issue receipt or accounting fake expense invoices.

All staff must follow accounting procedures, ensure that business transactions are recorded and documented appropriately and make certain that all disclosures made in financial reports are full, honest, accurate, timely and understandable. All staff must not improperly influence, manipulate, or mislead any audit.

Anti-Fraud

Fraud – the act or intent to cheat, steal, deceive or lie – is both unethical and, in most cases, criminal. Fraud in every form, (including e.g., submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

NORAD works with authorized vendors to avoid the risk of introducing counterfeit parts and materials into our final products.

Conflict of Interests

Our decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence. A "conflict of interest" exists when an employee's personal interest (that can be linked to e.g., friends, family, or customer, competitor, supplier, contractor entity, as well) interferes or potentially



interferes with the best interests of NORAD. Determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict-of-interest question should seek advice from management.

Conflicts of interest could arise:

- Being employed (you or a close family member) by or being in economic relation with an actual or potential customer, competitor, supplier, or contractor.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for another company or organization.
- Owning or having a substantial interest in a customer, competitor, supplier, or contractor.
- Having a personal interest, financial interest, or potential personal gain in any company transaction.

If co-workers become involved in personal relations with each other, the onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise.

Privacy, personal data protection

We respect people's privacy, and we acknowledge customers, employees and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary, and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity, and availability of personal information.

Our staff must observe the legal requirements, apply compliant practices, and follow related procedures to ensure legality of personal data handling and processing activities.

Training

Thorough training is provided to all of our employees through our training facility in our processing center. Our classroom has all the tools to educate our employees: conference room type setting for the audio and visual presentation portion of the training, as well as condensed mechanic set up for hands on training for the installers. Employees are set up for success by ensuring that they are comfortable with all aspects of their job, know the expectations that are set for them, fully understand NORAD's code of conduct, and all safety precautions relative to their position.

Summary

If an employee or stakeholder feels that we are not meeting the human rights, working conditions or meeting any of the standard set out in this document, then they are to file a grievance complaint and submit it to their manager or at the next stakeholder meeting. If they are a union member, then they are to take their complaint to their union representative. It is our goal at NORAD to meet the expectations set out in our code of ethics. This code is reviewed annually to ensure that it is compliant with current state and federal laws and always meets our standards at NORAD. This Code of Conduct is to be provided to all new hires as a part of their training, as well as any follow up training as the code if it is changed. Copies are available on our employee website as well as a hard copy is accessible in the manager's office.



NORAD Declaration Form

I _____ (print name) confirm that I have read and understood NORAD's Code of Conduct, Safety Manual, and Environmental Policy in its entirety and agree to comply with these policies. I understand that I will be trained on all of these policies at the time of hiring, further training on these will be conducted if there are changes made to these policies. Refresher training will be completed annually upon the anniversary of my date of hire. I understand that each position at NORAD has specific training requirements, and I will be trained further if my job duties change. I understand that quality and safety audits will take place at random to ensure that my fellow colleagues and I are compliant and are not at risk of endangerment. If I am not in compliance with these policies, I understand that I will be retrained in deficient areas.

Signature: _____

Date: _____