



SUMMA DEFENCE CODE OF CONDUCT

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SUMMA DEFENCE CODE OF CONDUCT

INTRODUCTION

At Summa Defence and its group companies, we are committed to the highest standards of integrity, ethical conduct, and compliance with all applicable laws and regulations. These commitments are fundamental to our long-term success and to maintaining the trust of our customers, suppliers, investors, business partners, employees, and the communities in which we operate.

We strive to be a trusted and responsible business partner by conducting our business ethically, transparently, and sustainably. Integrity is at the core of every decision we make and every action we take.

This Code of Conduct sets out the fundamental principles and standards that govern all of Summa's operations. The commitments contained in this Code are non-negotiable and must never be compromised for commercial or other business interests.

The Executive Management Team expects every employee, director, officer, and, where applicable, our business partners to read, understand, and comply with this Code of Conduct and all related policies and procedures. Each of us shares responsibility for upholding these standards and protecting the reputation, values, and long-term success of Summa Defence.

Robert Blumberg, President & CEO

1. Scope

This Code of Conduct is applicable to all Summa companies, their executives, and their employees as well as all Summa contractors, agents, consultants, and other third parties acting on Summa's behalf ("**Summa**" or "**we**"). We expect our suppliers, customers, and other business partners to commit to a similarly high level of ethical conduct, legal compliance, and integrity.

2. Human Rights and International Humanitarian Law

Summa strongly promotes respect for human rights in its own operations as well as in those of its business partners. We are committed to recognized international standards, such as the United Nations Guiding Principles on Business and Human Rights. We have zero tolerance for human rights abuses, such as slavery, forced labour, child labour, or human trafficking. We respect and promote the freedom of opinion and expression, religion and peaceful assembly as well as the freedom from any discrimination based on race, age, nationality, gender or sexual orientation, as well as all other essential human rights and freedoms. Summa is committed to the principles of international humanitarian law (IHL) and does not accept any misuse of its products that would result in violations of IHL or human rights law.

3. No Corruption or Bribery

Summa does not tolerate corruption or bribery in its own operations nor in those of its business partners. We do not offer or accept bribes, facilitation payments, or other improper financial benefits nor provide gifts or hospitality in excess of our internal standards. In collaborating with Government bodies or public officials, we act openly and truthfully and carefully avoid exerting any real or perceived improper influence. We do not contribute to political parties or candidates.

4. Conflicts of Interest

Summa employees are required to carefully seek to avoid any situation where conflicts of interests may arise. When unavoidable, we expect our employees to duly report conflicts of interest in line with our internal guidelines and act in accordance with instructions given in response to such reports.

5. Money-Laundering and Financial Crime

Summa is committed to combatting money-laundering, terrorism financing, and other forms of serious financial and other crime. We conduct risk-based due diligence on our business partners and our transactions. We do not enter into business relationships with partners that do not share these commitments nor into transactions which are inconsistent with applicable laws, or which pose an unacceptable risk of money-laundering or other criminal activity.

6. Trade Compliance

Summa is committed to compliance with all applicable sanctions and export control regulations. We implement effective, risk-based trade compliance procedures and controls, including sanctions screening and supply chain due diligence, to ensure we not conduct transactions with sanctioned parties or violate any relevant restrictions applicable to our exports, re-exports, imports or other activities. We strive to detect and prevent any attempts by third parties to circumvent sanctions or cause our products to be unlawfully diverted to unwanted end-uses or end-users. Summa does not conduct business in countries subject to relevant embargoes or other comprehensive sanctions.

7. Fair Competition

Summa competes fiercely and fairly. We comply with all applicable competition and antitrust legislation and carefully avoid situations that are conducive to improper collusion. We never discuss issues such as pricing or business strategy with competitors.

8. Working With Suppliers and Customers

Summa is committed to the highest ethical standards and to full compliance with all applicable laws. We expect the same from our suppliers and our customers and will not enter into or maintain business relationships with companies that do not share our fundamental values and commitments. We conduct risk-based due diligence on our supply chains and on the end-use of our products.

9. Respecting Our Employees

Employees are Summa's most important asset. We treat every employee and potential recruit fairly, with respect and dignity, and we never discriminate on improper grounds. We are committed to the highest standards of health, safety, and well-being at our facilities. We fully comply with all applicable laws related to employment and recruitment.

10. Data Protection and Information Security

Summa values the protection of personal data as a fundamental right. We collect, use, and store personal data responsibly and ethically, and always in full compliance with applicable data protection laws. We employ advanced information security measures to protect sensitive data, including personal data, confidential business information, and technical data subject to export control requirements.

11. Intellectual Property

Summa's commercial edge derives from cutting-edge research, development, and innovation. Our intellectual property is a key to our long-term success, and we take extensive measures to protect and defend all our intellectual property rights and related information and software. We treat third-party intellectual property with the same degree of respect and afford it all the same protections as we would to our own.

12. Product Quality and Safety

Summa takes great pride in the quality of its products and services. We strive to offer the highest quality available on the market in all the segments we operate and are always looking for ways to improve. We welcome and respond to feedback from our customers and other stakeholders. We always comply with applicable product quality and safety laws and standards.

13. Environmental Responsibility

As a responsible corporate citizen, Summa is committed to high environmental standards, ambitious sustainability goals, and to doing its part in combatting climate change. We seek to reduce our environmental impact strategically, including through the effective use of energy and resources and by working together with our business partners and other stakeholders to reduce the overall environmental impact of our supply chains.

14. Securities Markets Compliance

As a publicly listed company, Summa is bound by various laws and guidelines regulating the financial market. Summa is committed to compliance with all such regulations. We communicate substantial financial and business information only through approved spokespersons, and always in accordance with our internal guidelines and in compliance with the law. We maintain accurate and complete records in compliance with applicable accounting and reporting requirements. We never misuse or disclose insider information unethically or in violation of any applicable regulations.

15. Reporting Concerns

Summa strongly encourages employees to report any concerns they have in respect to compliance with applicable laws, this Code of Conduct, or any of our Policies. Our Whistleblowing tool provides a simple and reliable tool for doing so. You may also discuss your concerns with your manager, a senior executive, or a member of the Summa legal and compliance function. Summa treats all reports respectfully and confidentially. Reports can be made anonymously where permitted by law. We do not tolerate retaliation against anyone who, in good faith, raises a concern.