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**SD-CE-001: Code of Ethics and Business Conduct Policy**

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A Guide to the Standards of  
Code of Ethics and Business Conduct  
Anti-Bribery and Anti-Corruption Policy  
Gifts and Hospitality Policy  
Whistle-Blower Protection Policy

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**Appendix**

- A - Definitions
- B - Gifts & Hospitality Chart
- C - Summary of the Foreign Corrupt Practices Act of 1977

**1. Introduction**

- 1.1. SDLLC and its associates are dedicated to providing the highest quality products and services to our customers while observing the highest legal, ethical, and moral standards. SDLLC strives to conduct business with integrity while complying with the anti-corruption laws of every country in which it operates. The Supplying Demand LLC Code of Ethics and Business Conduct Policy (The Policy) outlines the standards, principles, and protocols that all employees and associates of SDLLC must adhere to. It encompasses monitoring, reporting, training, and certification controls to ensure ethical behavior and prevent all forms of corruption that might reflect adversely upon the reputation of SDLLC and inflict damage on its business.
- 1.2. The Policy is maintained by an Ethics Committee drawn from top management. The committee members are Marty Martinez, Juan Martinez, Paris Sofikitis, and Frank Ortiz. The head of this committee, Marty Martinez, acts as the Compliance Officer and is responsible for the enforcement of the Policy.

**2. CODE OF ETHICS AND BUSINESS CONDUCT**

- 2.1. **Responsibilities for SDLLC Management**
- 2.2. It is the responsibility and duty of all directors, officers, and managers of SDLLC:
- 2.3. To comply fully with all applicable laws and regulations, domestic and foreign.
- 2.4. To be alert to all circumstances that might create or appear to create an illegal situation.
- 2.5. To distribute the ethical standards contained in this Policy to all employees, and to inform them of their obligation to adhere to these standards.
- 2.6. To ensure all employees understand these standards, encourage them to ask questions or seek advice at any time, and establish an anonymous reporting system for ethics advice and violations by SDLLC members.

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- 2.7. To develop, implement, monitor, and maintain a system of internal controls to facilitate compliance with this Policy, as well as to foster a culture of integrity and maintain high ethical standards throughout SDLLC.
- 2.8. To investigate fully any reports of illegal or unethical conduct immediately and swiftly correct any situation that may prove to be or may create the appearance of being illegal or unethical.
- 2.9. To promptly report any suspected law or ethics violation or other irregularities concerning government contracts to the appropriate government officials and fully cooperate with government agencies responsible for the investigations or corrective actions.
- 2.10. To be sensitive to any reports of unethical or illegal conduct by any organization or person with whom SDLLC does business or has a business relationship, including suppliers, contractors, and consultants.
- 2.11. To adhere to an operating policy of not hiring individuals who are suspended or debarred from government contracting; to remove from responsibility or involvement with government business affairs any current employee who is suspended or proposed for debarment; and to not contract with suspended or debarred individuals or companies, unless as provided by law.
- 2.12. **Responsibilities for SDLLC Employees**
- 2.13. It is the responsibility and duty of each employee:
- 2.14. To protect and preserve the integrity of SDLLC and to uphold these ethical standards and the policies and procedures that support them.
- 2.15. To read, understand, follow, and regularly review the Policy which includes anti-corruption expectations for all employees.
- 2.16. To seek help when the proper conduct is unclear.
- 2.17. To help create a workplace environment conducive to complying with these standards.
- 2.18. To report time worked in strict accordance with established SDLLC policies and procedures.

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- 2.19. To be alert to situations that could result in actions that violate these standards or are otherwise improper.
- 2.20. To follow all SDLLC policies and procedures regarding the supplier decision-making process.
- 2.21. To report suspected violations of these standards per the SDLLC Reporting System (see below).
- 2.22. To promptly give written notice to his or her immediate superior in situations where an employee has a potential conflict of interest, or if there exists an appearance of a conflict with a customer or supplier. The notice shall outline the nature of the conflict and the reasons that the employee believes a conflict might exist or appear to exist.
- 2.23. To avoid any outside activity that could adversely affect the independence and objectivity of their judgment, interfere with the timely and effective performance of their duties and responsibilities, discredit the Company, or conflict or appear to conflict with SDLLC’s best interests.
  
- 2.24. **Responsibilities for SDLLC Associates**
- 2.25. All directors, officers, employees, consultants, representatives, and contractors (SDLLC Associates) must read, understand, and comply with this Policy and the Foreign Corrupt Practices Act (Appendix C). SDLLC Associates are also required to sign a separate copy of the SDLLC Whistle-Blower Protection Policy (see below).
- 2.26. SDLLC Associates shall not use an agent or representative with a poor reputation or with links to a foreign government. SDLLC’s relationships with agents/representatives must be fully documented and include compliance with this Policy.
- 2.27. SDLLC Associates shall purchase materials, supplies, equipment, and services from qualified, competent, and responsible sources. To the maximum extent practicable, such purchases shall be made on a competitive basis and in accordance with sound business practices. Objectivity, impartiality, and fairness are required in the selection of every supplier for every order. Authorized SDLLC agents are the only people authorized to commit the company to a purchase.
- 2.28. SDLLC Associates shall not offer or agree to pay unusually large commissions where the agent/representative does not appear to provide significant services. Compensation must

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- be appropriate and justifiable and for the purpose of legitimate services rendered. SDLLC Associates are required to keep proper books and records available for inspection by SDLLC, its auditors and/or investigating authorities.
- 2.29. SDLLC Associates shall not make payments, including cash, without a documented paper trail or compliance with normal internal controls. To ensure the effectiveness of internal controls, business, and finance personnel of SDLLC will review transactions and expense/payment requests for warning signs that an inadequate commercial basis or excessive risk is present. All transactions must be recorded to permit preparation of financial statements in accordance with US Government and International Financial Reporting Standards and must be maintained for a period of five (5) years. Records will also document risk assessments and due diligence. No accounts or cash funds may be kept “off-book” to facilitate or conceal improper payments. The use of false documents and invoices is prohibited as are inadequate, ambiguous, or deceptive bookkeeping entries that might hide or disguise illegal payments. All business partners of SDLLC should have in place internal controls and procedures that fit these criteria and enhance compliance with this Policy.
- 2.30. SDLLC Associates will make no corrupt payments through any subsidiaries, agents, intermediaries, business partners, contractors, or suppliers (individuals or organizations), to offshore accounts, or to a third party where there is reason to believe that all or a portion of the payment will go toward a bribe. Associated entities are required to keep proper books and records available for inspection by SDLLC and its auditors and/or investigating authorities.
- 2.31. SDLLC Associates will not provide bonuses to foreign personnel for which there is little supporting documentation. The relationship with agents and other intermediaries must be fully documented using SDLLC’s standard terms and conditions for appointment, which shall include compliance with this Policy and prohibit associated entities from making or receiving any bribes on SDLLC's behalf.
- 2.32. SDLLC Associates will not hold private meetings requested by public contractors or companies hoping to tender an offer for contracts. SDLLC will not pay invoices more than contractual amounts. Preferences for all subcontractors must be justified.

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**2.33. Political Contributions**

- 2.34. All SDLLC Associates are entitled to engage in whatever lawful political activities they deem appropriate, including volunteer work and making contributions to candidates of their choice. But these activities must be undertaken as individuals, in their own time, and not as representatives of, or on behalf of, SDLLC. SDLLC Associates are prohibited from making political contributions in the name of SDLLC, and this prohibition extends to direct and indirect contributions, including cash, goods, loans, property, services, and the use of SDLLC facilities. Furthermore, SDLLC members are prohibited from attending rallies, parades, or other gathering events while wearing company gear (logo, shirts, hats, etc.), which might be interpreted as representing the company.
- 2.35. Unless expressly authorized by the company, no outside activity should involve the use of the SDLLC name, time, influence, assets, logo, funds, materials or facilities, or the services of other employees.

**2.36. Honest and Accurate Reporting**

- 2.37. All employees responsible for preparing or reviewing any report or certificate, regardless of whether it is to be used internally or provided to a customer, shall ensure, to the extent applicable:
- 2.38. That they understand, and that SDLLC has complied with, all applicable contract provisions.
- 2.39. That invoices reflect only agreed-upon contract prices, and that appropriate refunds or credits have been provided in any instances where excess payments have been received.
- 2.40. That the provisions of the Truth in Negotiation Act are followed, i.e., the most complete, accurate and up-to-date cost or pricing data are submitted to the government customer prior to completion of negotiations;
- 2.41. That applicable government procurement regulations have been met.

**2.42. Protection of SDLLC Technology**

- 2.43. SDLLC technology is valuable, and it is improper to use such property for any other purpose than that for which it is furnished and intended. Each employee is obligated to guard against unauthorized disclosure of SDLLC technology. The same strict rules of

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nondisclosure apply not only to company-owned technology, but also to private data furnished to SDLLC by suppliers and customers.

- 2.44. Computer systems and the information they contain, control, transmit or process are essential for SDLLC's operations. Employees are responsible for ensuring the computer systems and the information that they contain are adequately safeguarded against damage, alteration, fraudulent manipulation, theft, and unauthorized access or disclosure. Data processed and stored in computers must be protected as a SDLLC asset, and properly identified and safeguarded according to its proprietary and/or critical nature. Passwords or other processes used to access or transmit computerized data must be selected, controlled, and safeguarded to ensure that SDLLC data is adequately protected. Ultimately, each employee is responsible for the security of information accessed or modified under his or her password or access process. Also, as a user or manager of corporate data or computer resources, each employee must strictly adhere to the specific security measures and controls that have been established.
- 2.45. Employees may not make improper use of SDLLC or customer resources or permit others to do so. Improper uses include the unauthorized appropriation, possession, or personal use of SDLLC customer assets, or information, including technology, patents, equipment, software, and supplies. Employees also may not use or share proprietary information provided by customers or competitors without express permission from the providers.
- 2.46. **Dealings with the U.S. Government**
- 2.47. SDLLC's business with the Federal Government is important to its future. Success in this business depends upon maintaining public trust and confidence, which requires strict adherence, by every employee, to SDLLC policies and procedures, as well as all applicable laws and regulations. Each employee is responsible for ensuring that SDLLC's conduct -- and the conduct of anyone reporting to SDLLC -- fully complies with the policies governing SDLLC's business dealings with the Federal Government. Compliance by leaders and their subordinates may be a factor in periodic performance appraisals.
- 2.48. SDLLC policy prohibits any involvement in transactions related to defense articles or services requiring a license or approval if a debarred, suspended, or ineligible person

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could benefit directly or indirectly. SDLLC is responsible for securing valid export licenses from the Department of State or Commerce for materials subject to U.S. export regulations.

- 2.49. Of the many laws governing the conduct of government contractors, the following are most applicable to our business:
- 2.50. Procurement Integrity Act: The primary prohibitions under this and related laws include offering or discussing, directly or indirectly, future employment or business opportunities with a government procurement official; offering or giving, directly or indirectly, any money, gratuity, or anything of value exceeding \$50 to a government official; soliciting or obtaining, directly or indirectly, any proprietary or source selection information from any government officer or employee; or disclosing any proprietary or source selection information received, except as authorized by the government's contracting officer.
- 2.51. Anti-Kickback Act of 1986 and FAR 3.502-2: Applicable laws and regulations, as well as Company policy, prohibit employees, agents, or subcontractors from giving or receiving “kickbacks” (See Appendix A: Definitions). Also, a kickback may not be included in the contract price that a subcontractor charges the prime contractor or a higher-tier subcontractor. SDLLC will adopt procedures requiring subcontractors to certify they have not paid kickbacks and will implement audit procedures designed to detect kickbacks.
- 2.52. Drug-Free Workplace /Work Force: Applicable laws and regulations, as well as SDLLC policy, prohibit the illegal manufacture, use, possession, distribution, dispensation, transportation, purchase, or transfer of controlled substances or drugs by employees. New employees will be asked to review and sign SDLLC's Drug Free Workplace Policy (see Employee Handbook) when they begin their employment. Employees working on a certain contract may be subject to periodic random drug testing as required by regulations. Employees are required to notify in writing within five (5) days of any conviction for a violation of any criminal drug statute occurring in the workplace.
- 2.53. Limitations On the Use of Appropriated Funds: The so-called "Byrd Amendment" prohibits the use of appropriated funds to pay any person for influencing or attempting

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to influence a government employee or Member of Congress in connection with the award of a contract. There are two major exceptions to this prohibition. The first exception is for liaison activities by employees only (not consultants) in discussions with, or providing information to, an agency regarding the Company's products or services where they are not related to a specific pending solicitation. The second exception is for professional or technical services rendered by employees or consultants in preparing or submitting negotiations for any bid or proposal. SDLLC must file certifications and disclosures regarding certain "lobbying" activities. Employees, consultants, or contract laborers who have contacts with government employees or Members of Congress regarding procurement matters that may raise an issue under this legislation should consult any management member, to initiate proper legal review of the situation and to ensure an adequate understanding of the law and regulations. It is important that employees be aware of certain other statutes that punish acts of fraud and misconduct in government procurement such as: False Statements, False Claims, Conspiracy, Mail, Wire Fraud, and Bribery. This is not an all-inclusive list; these laws are mentioned here because they are the most often relied upon by the government in prosecuting misconduct.

- 2.54. The False Statements Act, 18 U.S.C. Sec. 1001: provides for a fine of up to \$10,000 or imprisonment for up to five years, or both, for deceiving the government. SDLLC can be convicted if a false statement is made by any employee. (There is no requirement that any officer or director knowingly or willingly participated in or authorized the violation for SDLLC to be held liable.) The intent necessary for conviction exists if the person was aware that he or she was doing something wrong or acted with specific intent to violate the law. There is no requirement for any specific intent to defraud the government. For instance, submitting false "estimates" of reimbursable expenses and costs to the government when actual timecards, logs and other supporting documentation is available would be considered a crime, because a false statement need not actually defraud but must only be capable of doing so.
- Employees: Any employee of Supplying Demand LLC (SDLLC) can be convicted under the False Statements Act (18 U.S.C. Sec. 1001) if they make a false statement to

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the government. This includes any act of deception, whether it directly defrauds the government or not.

- The company (SDLLC): SDLLC as an entity can be held liable if one of its employees makes a false statement, even if no officer or director was involved in, or even aware of, the false statement.

2.55. The Criminal False Claims Act, 18 U.S.C Sec. 287: makes it a crime to knowingly present a false claim to any person or officer in the civil or military service of the United States or any of its agencies or departments. The same rules apply also in respect to foreign governments. The statute has been used in prosecutions of many different procurement fraud schemes including defective pricing, product substitution, progress payment, and labor cost mischarging. To represent and ship a used, overhauled, or surplus item as Newly Manufactured (NM) or Factory New (FN) is a criminal false claim. A conviction requires proof that a claim was submitted to the government; that the claim was false, fraudulent, or fictitious; and that the defendant submitted the claim knowing that it was such. Generally, the government is not required to prove that the defendant had the intent to defraud. Also, the Major Fraud Act, 18 U.S.C. Sec 1031, is a special provision aimed at contracts or subcontracts valued over \$1 million, and violators may incur fines of up to \$10,000. The "civil" False Claims Act, 31 U.S.C. Sec 3729-3732, permits the recovery of triple the amount of damages suffered by the United States and civil penalties of \$5,000 to \$10,000 per violation against any person who presents or causes to be presented a false claim, or causes a false record to be made to get a fraudulent claim paid, or conspires to defraud the government by getting a false or fraudulent claim allowed or paid. The statute also provides a complex procedure for the initiation of qui tam actions which allows persons and entities with evidence of fraud against federal programs and contracts to sue the wrongdoer on behalf of the US Government.

2.56. Conspiracy to defraud the Government with respect to claims 18 U.S.C. Sec 286: is a "specific" conspiracy statute that requires agreement to defraud the government through a particular device, other than that of submitting false claims. In other respects, the proof required is the same as for 18 U.S.C. Sec 371, the general statute proscribing

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conspiracy: an agreement between two or more persons to commit a crime against, or to defraud, the United States (impede lawful governmental functions) and proof of an overt act by one of the conspirators in furtherance of the conspiracy to commit a crime against or to defraud the United States has been charged in a wide variety of procurement fraud schemes from bid rigging and conversion of government property to more general schemes to impeded governmental functions such as collusion to impede the proper operation of a procurement system for awarding defense contracts.

- 2.57. Mail and Wire Fraud 18 U.S.C. Sec 1341 and 1343: make it a crime to use the US Postal Service, wire, radio, or television in devising a scheme or artifice to defraud, i.e., to obtain money or property by false pretense or promises. Section 1345 defines "scheme or artifice to defraud" to include a scheme or artifice to deprive another of the "intangible right of honest services." The penalty for commission of the offense (excluding an offense involving a financial institution) is a fine of not more than \$1,000 or imprisonment for not more than five years, or both. The mail and wire fraud statutes have been significant and versatile tools to the prosecution of defense procurement fraud cases.
- 2.58. Bribery of public officials and witnesses (18 U.S.C. Sec 201): Government regulations prohibit the giving of any gratuity valued at more than \$50 to government personnel or their families. Agency personnel are required to report suspected violations. The government is authorized to terminate the entire contract if it is determined that the contractor or any of its employees or agents offered or gave any gratuity (such as entertainment or a gift) to an officer, official, or employee of the government to obtain a contract or favorable treatment in the awarding, amending, or the making of determinations concerning the performance of the contract.
- 2.59. Arms Export Control Act 28 U.S.C. Sec 2778: establishes registration and licensing requirements for manufactures, exporters, or importers of certain defense articles and defense services. Importing or exporting violations, or the willful making of false statements in connection with the reporting requirements of the law, will subject the person to fines of up to \$1,000,000 or imprisonment of up to 10 years.

2.60. **Dealings with Competitors**

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- 2.61. The U.S. antitrust laws apply to competition within the U.S. and to some international business transactions by U.S. firms. The objective of the U.S. antitrust laws is to benefit consumers by promoting vigorous competition. The basic U.S. antitrust statutes are the Sherman, Clayton, and Federal Trade Commission Acts. The Sherman Act prohibits contracts and conspiracies that unreasonably reduce or eliminate competition. The Clayton Act addresses exclusive dealing arrangements, price discrimination, and acquisitions. The Federal Trade Commission Act generally prohibits unfair or deceptive trade practices.
- 2.62. Failure to comply with these laws can have serious consequences. Corporations and individuals accused of violating the Sherman Act, for example, may be indicted on felony charges, and violations may result in costly damage awards and burdensome injunctive orders.
- 2.63. SDLLC's competitive efforts must rely on the merits of its products and services. Employees should concentrate on anticipating and satisfying the needs of the Company's customers. To accomplish this, employees should:
- 2.64. Accurately represent the quality and features of available products or services and those of its competitors.
- 2.65. Refrain from unlawfully interfering with contracts between a competitor and a customer.
- 2.66. Refrain from purchasing from suppliers or implying that SDLLC will purchase from a supplier on the condition that they use SDLLC's products or services. Antitrust proceedings often involve evidence that is largely circumstantial. Judges, jurors, and agencies interpreting this evidence are likely to be influenced by appearances. Consequently, to minimize SDLLC's exposure to civil and criminal penalties, SDLLC must avoid not only actively engaging in improper competitive practices, but also inadvertently appearing to engage in improper practices. Because price fixing and division of markets is illegal, employees should not discuss with competitors such things as costs, prices, terms of sale, production levels or capacity inventories, marketing plans, distribution arrangements or procurement arrangements.
- 2.67. To refrain from assisting competitors in any way or becoming involved in activities or businesses that compete with SDLLC's activities or its business. This policy does not

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apply to partners in joint ventures with the Company, or to SDLLC competitors when performed under approved Company programs.

**2.68. Inside Information**

2.69. Employees should not trade in the securities of another company based on nonpublic information about a company that has been obtained during the course of performing work for SDLLC. For example, an employee who learns that another company is being considered for a major contract or a joint venture, may not use this information to trade in that company's securities. Employees should keep any such information about SDLLC, or other companies, secret and use it only for company purposes. Inside material information can include anything that could have actual significance in an investor's decision, such as acquisition plans, dividends, earnings, new contracts, products, or discoveries, major regulatory, court, or legislative events, and major management changes or other business plans. Such information should be disclosed only to those with a SDLLC-authorized need to know.

**3. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

- 3.1. SDLLC' long-standing commitment to doing business with integrity means avoiding corruption in any form, including bribery, and complying with the anti-corruption laws of every country in which we operate. As the anti-corruption laws in the US, Canada, and Europe have extraterritorial application, SDLLC, its employees and associated persons will be bound by the most stringent requirements of these laws in respect to its conduct in all jurisdictions in which they operate. (See Appendix A for definitions of Bribery Offences.) Division managers will have full authority to implement the Policy within their spheres of responsibility. The measures taken by managers will be proportionate to the risks associated with their areas of responsibility but may include:
- 3.2. Devising, implementing, and maintaining systems and controls designed to prevent bribery, minimize the risk of bribery and detect instances of bribery;
- 3.3. Ensuring that employees are aware of the Policy; and

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- 3.4. Ensuring that employees participate in anti-bribery training and that training specific to the needs of employees or job functions is provided when appropriate.
- 3.5. A manager to whom an employee's concerns are expressed must act promptly and escalate the matter in accordance with this Policy. Where it is decided that further investigation is not appropriate a prompt and full explanation of the reasons for reaching this conclusion must be given to the reporting employee.
- 3.6. It is the responsibility of the Ethics Committee:
- 3.7. To implement this Policy, monitor its uses and effectiveness and review the implementation of this Policy, considering its suitability, adequacy, and effectiveness. Any deficiencies identified will be rectified as soon as possible.
- 3.8. To ensure those reporting to him/her are made aware of and understand this Policy.
- 3.9. To ensure this Policy complies with SDLLC's legal and ethical obligations.
- 3.10. To ensure all those under SDLLC's control comply with it.
- 3.11. It is the responsibility and duty of SDLLC Associates:
- 3.12. To ensure the success of this Policy and follow the procedures set out herein to disclose any suspected wrongdoing.
- 3.13. To participate in all forms of Ethics/Anti-Bribery training provided by SDLLC, as required.
- 3.14. To prevent, detect, and report bribery offenses and other forms of corruption.
- 3.15. To act and conduct business in an honest, professional, fair, and ethical manner. If there are any suspicions, concerns, or queries regarding payments, prior to taking any action, employees should consult with the Compliance Officer or an Ethics Committee member.
- 3.16. To refrain from giving, promising to give, or offering a payment, gift, or hospitality to a third party with the expectation or hope that an advantage in business will be received or to “facilitate” or expedite a routine procedure. Payment on behalf of SDLLC must have proof detailing the proportionate amount for the goods and services provided.
- 3.17. To refrain from industrial espionage or commercial bribery, engaging in or permitting a bribery offence to occur, or granting a reward for a business advantage already given.

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- 3.18. To refrain from accepting a payment, gift, or hospitality from a third party if it is known or suspected that it is offered or provided with an expectation that a business advantage will be provided by SDLLC in return.
- 3.19. To refrain from threatening or retaliating against another employee or worker who has refused to commit a bribery offence or who has raised concerns under this Policy or SDLLC's Whistle-Blower Protection Policy.
- 3.20. To refrain from engaging in any activity that might lead to a breach of this Policy.
- 3.21. Compliance with this Policy constitutes terms of service for each director, conditions of employment for each officer and employee, and conditions of providing services to SDLLC for each consultant and contractor. Each person agrees to be bound by the provisions of this Policy upon notification of the most recent copy being given to them. Non-compliance with the Policy may result in criminal or civil penalties, which will vary according to the offence. An employee acting in contravention of the Policy will also face disciplinary action up to and including dismissal.
- 3.22. SDLLC will conduct appropriate due diligence to inform risk assessments and ensure compliance with the Policy. The following list is not exhaustive, and warning signs will vary by the nature of the transaction, expense/payment request, geographical market, or business line, however the common warning signs that should be considered as part of any due diligence include:
  - 3.23. That an Associated Entity has current business, family, or another close personal relationship with a customer or government official; has recently been a customer or government official or is qualified only based on his influence over a customer or government official;
  - 3.24. A customer or government official recommends or insists on the use of a certain business partner or Associated Entity;
  - 3.25. An Associated Entity refuses to agree to anti-corruption contractual terms, uses a shell company or other unorthodox corporate structure, insists on unusual or suspicious contracting procedures, refuses to divulge the identity of its owners, or requests that its agreement be backdated or altered in some way to falsify information;

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- 3.26. An Associated Entity has a poor reputation or has faced allegations of bribes, kickbacks, fraud, or other wrongdoing or has poor or non-existent third-party references;
- 3.27. An Associated Entity does not have an office, staff, or qualifications adequate to perform the required services; or
- 3.28. An expense/payment request by an Associated Entity is unusual, is not supported by adequate documentation, is unusually large or disproportionate to products to be acquired, does not match the terms of a governing agreement, involves the use of cash or an off-the-books account, is in a jurisdiction outside the country in which services are provided or is in a form not in accordance with local laws.
- 3.29. This Policy extends across all SDLLC’s business dealings and all countries and territories in which SDLLC operates. All persons covered by this Policy in discharging their duties on behalf of SDLLC, are required to comply with the laws, rules, and regulations applicable in the location in which SDLLC is performing business activities, and with respect to anti-bribery and corruption laws, rules, and regulations. If there are questions about how this Code should be followed in a particular case, one should contact the Compliance Officer or a member of the Ethics Committee who may seek further legal advice.
- 3.30. All directors, officers, employees, consultants, and contractors of SDLLC are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the Compliance Officer.
- 3.31. It is important to note that SDLLC is sometimes engaged in conducting business in places where personal safety may not be guaranteed by local officials. If one is subjected to an immediate threat to personal safety, one may put personal well-being first, even if it means making a payment that contravenes this, Policy. The details of all such incidents must be reported to the Compliance Officer immediately.

**4. GIFTS AND HOSPITALITY POLICY**

- 4.1. SDLLC success in the marketplace results from providing superior products and services at competitive prices. SDLLC does not seek to gain an improper advantage by offering business courtesies such as entertainment, meals, transportation, or lodging in exchange

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for business. Employees should never offer any type of business courtesy to a customer for the purpose of, or in exchange for, obtaining favorable treatment or advantage. Nevertheless, except for restrictions that apply when dealing with government customers as noted below, if approved in accordance with SDLLC policy, employees may pay for reasonable meals, refreshments, and/or entertainment expenses for customers and suppliers that are incurred only occasionally, are not requested or solicited by the recipient, and are not intended to or likely to affect the recipient's business decisions with respect to SDLLC. However, employees may never provide or pay for any meal, refreshment, entertainment, travel, or lodging expense for any U.S. government employee. State and local governments may also have restrictions on business courtesies, so employees doing business with these entities must check with the Ethics Committee to determine if any restrictions apply. If a meal is brought onto SDLLC's premises to accommodate a continuing business meeting with government employees, the government employees shall be given an opportunity to reimburse SDLLC for the reasonable value of their food.

- 4.2. This Policy sets out when it is, and is not, appropriate for one to make or receive gifts and / or hospitality from a third party. It does not prohibit normal and appropriate gifts or hospitality (given or received), to or from third parties. Gifts must not violate the policy of the recipient. In some foreign countries, customs require the exchange of gifts and, in cases where it is desirable to meet such a requirement, SDLLC will provide the gift, and any gifts received will become SDLLC property. Cash or cash equivalents, gifts, and hospitality that can be considered offensive or inappropriate, and Per Diem or daily payments are never permitted. Please refer to the Gifts and Hospitality Chart in Appendix B regarding approvals necessary for any gifts given or received.
- 4.3. Form F-501-001 SDLLC Gifts and Hospitality Registry is maintained by the Marketing Department. All gifts, gratuities, and entertainment given or received, accepted, or rejected by SDLLC employees and its associates are recorded in the log and include the value of the gift, the individual/organization giving or receiving and the reason for the expenditure/gift.
- 4.4. All directors, officers, employees, consultants, and contractors of SDLLC must seek approval for any gifts given or received and record them on F-501-001 in accordance with

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the Gifts and Hospitality Policy. SDLLC is committed to making a positive difference in the communities in which it operates. As part of this commitment, SDLLC will consider requests from governments and local organizations to contribute to local cultural activities or to contribute to the development of or provide goods and services to local projects. Requests must be carefully considered to ensure that the contributions made will be used for the intended lawful purposes. No charitable contribution, sponsorship or similar contribution shall be given unless it has been pre-approved by management and/or the Compliance Officer.

- 4.5. All expenses incurred on behalf of third parties relating to hospitality, gifts or expenses must be submitted in accordance with the relevant SDLLC group company policies and the reason for the expenditure must be specifically recorded.
- 4.6. As a general rule, employees cannot accept, and shall refuse, all offers or gifts, gratuities, entertainment, or other favor of value from current or potential suppliers. (This prohibition does not apply to mass-produced items of nominal value, such as pencils and the like, which are not offered with any intent or expectation of evoking any reciprocity from SDLLC.) Thus, employees who purchase supplies or services for SDLLC, solicit information or data that may reasonably lead to a purchase of supplies or services for SDLLC, or interface in a way that influences or tends to influence the purchase on behalf of SDLLC with suppliers shall refuse any offer of a gift, gratuity, entertainment, or other favor, from any suppliers, including meals, with the following exceptions:
  - 4.7. When lunch or dinner is brought into the supplier's facility to accommodate a continuing business meeting or facilitate a critical time schedule; or
  - 4.8. When accepting a meal and/or refreshments at a business-related function sponsored by a local supplier (s) that is open to the entire industry for the purpose of introducing new products, discussing industry trends or other related pertinent information.
- 4.9. Employees who do not purchase, or do not tend to influence the purchase of, supplies or services for SDLLC may accept meals, drink, or entertainment only if these courtesies are unsolicited, infrequently provided, reasonable in amount, and directly connected with business discussions. But such employees shall not accept these items where they are offered or appear to be offered in exchange for any type of favorable treatment or advantage from SDLLC.

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**5. WHISTLE-BLOWER PROTECTION POLICY**

- 5.1. SDLLC has adopted PO-502 SDLLC Whistle-Blower Protection Policy which requires its directors, officers, employees, agent/representatives, and contractors (SDLLC Associates) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, to comport themselves with honesty and integrity, and to comply with all applicable laws and regulations.
- 5.2. The SDLLC Whistle-Blower Protection Policy is intended to provide an internal method for all SDLLC Associates to raise serious concerns regarding violations or suspected violations of SDLLC’s Product Safety Policy, Code of Ethics and Business Conduct Policy, U.S. or State laws, or applicable regulations so that SDLLC can address and correct unsafe practices, inappropriate or illegal conduct and actions. It is contrary to the values of SDLLC for anyone to retaliate against any person who, in good faith, reports a safety violation, an ethics violation or a suspected violation of any company code, regulation or law. Any employee who retaliates against one who has reported a violation in good faith is subject to discipline up to and including termination. Complaints which are made maliciously, or are knowingly false, will be considered a serious and improper infraction and will be subject to disciplinary action.
- 5.3. **SDLLC Reporting System**
- 5.4. Any report of solicitation to engage in a prohibited act, possible violation, or suspected violation of the Policy may be reported to a division supervisor, the Division Manager of the alleged violator, a member of the Ethics Committee, or SDLLC’s Compliance Officer, Marty Martinez. Such complaints will be handled in a confidential manner, will be promptly investigated, and appropriate corrective action will be taken as necessary. Where the matter is deemed to be serious it will be promptly reported to the Ethics Committee and the following procedure will be followed:
- 5.5. The report will be recorded, and an investigative file established. In the case of an oral report, the party receiving the report must also prepare a written summary.
- 5.6. The Compliance Officer will promptly commission an investigation. The investigation may be conducted by SDLLC personnel, or by outside counsel.

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- 5.7. The investigation will document all relevant facts, including the people involved, times and dates. The Compliance Officer shall advise the Ethics Committee of the existence of the investigation.
- 5.8. The identity of a person filing a report will be treated as confidential to the extent possible, and only revealed on a need-to-know basis or as required by law or court order.
- 5.9. Upon completion of the investigation, a written investigative report will be provided to the Compliance Officer by the persons employed to conduct the investigation. If the investigation has discovered unlawful, violative, or other questionable conduct, the Compliance Officer will advise the Ethics Committee of the matter and shall cause such remedial action as the Ethics Committee deems appropriate under the circumstances to achieve compliance with the Policy and applicable law, and to otherwise remedy any unlawful, violative, or other questionable conduct. The people employed to conduct the investigation shall prepare, or cause to be prepared, a written summary of the remedial action taken.
- 5.10. In each case, the written investigative report (or summary of any oral report), and a written summary of the remedial action taken in response to the investigative report shall be retained along with the original report by or under the authority of the Compliance Officer.
- 5.11. Complaints can be submitted via US Postal mail, email, or telephone. Complaints may be made anonymously if one chooses to do so. If an anonymous complaint is made, it is suggested that the US Postal Mail option be used, and the complaint be directed to the Compliance Officer. In addition, The Federal and California Employment Notices are on display in the break room. One of the notices is the Whistle-Blower Notice, complete with a 1 (800) 952-5225 Hotline number.
- 5.12. **Consequences of Violations**
- 5.13. SDLLC employee reports of violations will be handled confidentially, and alleged violators will be treated fairly according to the circumstances. However, SDLLC is committed to this policy and all confirmed violations will result in disciplinary action such as: a reprimand; loss of compensation, seniority, or promotional opportunities; a

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demotion, or discharge. An individual may also face criminal charges and penalties, including fines and imprisonment. Individuals accused of violations may have to bear their own legal expenses. Illegal conduct can also result in disciplinary action by SDLLC, including dismissal from employment.

### 6. CONCLUSION

- 6.1. To ensure that all directors, officers, employees, consultants, and contractors of SDLLC are aware of this Policy, an electronic copy of the Policy is available in the AA folder on the shared S Drive and in the QMS folder with all SDLLC's Procedures and Policies. All directors, officers, employees, consultants, and contractors of SDLLC will be informed whenever significant changes are made.
- 6.2. Training in this Policy will form part of the induction process for all new directors, officers, employees, and consultants of SDLLC. All existing directors, officers, employees and consultants will receive relevant training on how to implement and adhere to this Policy.
- 6.3. SDLLC's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of the business relationship and as appropriate thereafter. For advice on these communications, please contact the Compliance Officer.
- 6.4. SDLLC is an organization consisting of many people. It is the individual and collective efforts of all the company's employees that will continue to determine its success and its reputation. The company's reputation for high performance, integrity, and trustworthiness as a business, benefits from each of its employees individually and collectively. As such, each employee's contribution to the good name of SDLLC is meaningful and important. To ensure the continued success of SDLLC and maintain its standing in the aerospace business community, Management pledges full cooperation in the enforcement of these standards.

### 7. APPENDIX A: DEFINITIONS

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- 7.1. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or business or personal advantage.
- 7.2. An inducement is something which helps to bring about an action or desired result.
- 7.3. A business advantage means that SDLLC is placed in a better position (financially, economically, or reputationally, or in any other way which is beneficial) than its competitors due to bribery or corrupt action/activity.
- 7.4. A kickback is a payment of any portion of a contract made to employees of another contracting party or the utilization of other techniques, such as subcontract, purchase orders or consulting agreements, to channel payment to public officials, political parties, party officials or political candidates, to employees of another contracting party, or their relatives or business associates.
- 7.5. Extortion means to directly or indirectly demand or accept a bribe, facilitation payment or kickback.
- 7.6. A third party is any individual or organization with whom one may come into contact during the course of one's work for SDLLC, and includes actual and potential customers, suppliers, distributors, business contacts, agents or representatives, advisers, government, and public bodies, including their advisors, representatives and officials, politicians, and political parties.
- 7.7. A facilitation payment is a payment to a foreign public or government official with the intention to bribe them to expedite an administrative process to benefit SDLLC or one of our partners.
- 7.8. A conflict of interest occurs when an individual's personal interests – family, friendships, financial, or social factors – could compromise his or her judgment, decisions, or actions in the workplace.

## 8. APPENDIX B: GIFTS & HOSPITALITY CHART

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Giving or receiving G+H per person per event	Requirements
Cash or cash equivalents	Never permitted
G+H that can be considered offensive or inappropriate	Never permitted
Per diem or daily payments	Never permitted
Greater than \$100	Approval by Vice-President or above – log in G+H Report
\$50 to \$100	Approval by Director of above – log in G+H Report
\$10 to \$49	Supervisor Approval - log in G+H Report
Any value greater than \$0, to a Government Official	Supervisor Approval - log in G+H Report

## 9. APPENDIX C: SUMMARY OF THE FOREIGN CORRUPT PRACTICES ACT

### 9.1. C.1.0 ANTI BRIBERY PROVISIONS

9.2. C.1.1 The Act makes it a criminal offense for any U.S. person or business enterprise (or any foreign person or entity while present in the territory of the United States) corruptly to offer, give, promise to give or authorize the giving of any money or anything of value to a Foreign Official, political party, party official or candidate for foreign political office, for the purpose of obtaining or retaining business for or with, directing business to, or gaining an improper business advantage for any person or company or any person while knowing that all or a portion of such money or thing of value will be offered, promised or given, directly or indirectly, to any Foreign Official, political party or party official or candidate for any such purpose. (Tit. 15 U.S.C. ((78dd 1(a), 78dd 2(a), 78dd-3(a)).

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- 9.3. Companies found in violation of the Act can be fined up to \$2,000,000. Individuals convicted of violating the law may be fined up to \$100,000 and imprisoned for up to five years. The Act prohibits the fine imposed on the individual from being paid directly or indirectly by the company on whose behalf he or she acted. (Tit. 15 U.S.C. ((78dd 2(g), 78ff(c), 78dd-3(e)).
- 9.4. C.1.2 Exception for routine government actions: The prohibitions of Section D.1.1 will not apply to any facilitating or expediting payment to a Foreign Official, political party, party official or candidate, if the purpose of such payment is to expedite or secure the performance of a routine governmental action. (Tit. 15 U.S.C. ((78dd 1(b), 78dd 2(b), 78dd 3(b)).
- 9.5. C.1.3 Affirmative defenses: It will be a defense to actions under Article A that:
- 9.6. The relevant payment, gift, offer or promise of anything of value was lawful at the time given under the country's written laws or regulations;
- 9.7. the payment, gift, offer or promise of anything of value was a reasonable and bona fide expenditure, such as travel and lodging expenses, incurred by or on behalf of a Foreign Official, party, party official or candidate and was directly related to:
- 9.8. the promotion, demonstration or explanation of products and services, or
- 9.9. the execution or performance of a contract with a foreign government or agency thereof. (Tit. 15 U.S.C. ((78dd 1(c), 78dd 2(c), 78dd 3(c)).
- 9.10. **C.2.0 DEFINITIONS**
- 9.11. C.2.1 Foreign Official: The term "Foreign Official" means any officer or employee of a foreign government (i.e., non U.S.) or any department, agency, or instrumentality thereof, or of a public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality or for or on behalf of any such public international organization. (Tit. 15 U.S.C. ((78dd 1(f)(1), 78dd 2(h)(2), 78dd 3(f)(2)).
- 9.12. C.2.2 Public International Organization:
- 9.13. An organization that is designated by Executive Order pursuant to Section 1 of the International Organizations Immunities Act (22 U.S.C. § 288); or

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- 9.14. Any other international organization that is designated by the President by Executive order for the purposes of this section, effective as of the date of publication of such order in the Federal Register. Tit. 15 U.S.C. (( 78dd-1(f)1, 78dd2(h)(2), 78dd-3(f)(2)).
- 9.15. C.2.3 Knowing:
- 9.16. A person's state of mind is "knowing" with respect to conduct, a circumstance, or a result if:
- 9.17. such person is aware that such person is engaging in such conduct, that such circumstance exists, or that such result is substantially certain to occur; or
- 9.18. such person has a firm belief that such circumstance exists or that such result is substantially certain to occur.
- 9.19. When knowledge of the existence of a particular circumstance is required for an offense, such knowledge is established if a person is aware of a high probability of the existence of such circumstance, unless the person actually believes that such circumstance does not exist. (Tit. 15 U.S.C. ((78dd 1(f)(2), 78dd 2(h)(3), 78dd 3(f)(3)).
- 9.20. C.2.4 Routine governmental action:
- 9.21. C.2.4.1 The term "routine governmental action" includes only an action which is ordinarily and commonly performed by a Foreign Official in:
- 9.22. obtaining permits, licenses, or other official documents to qualify a person to do business in a foreign country;
- 9.23. processing governmental papers, such as visas and work orders;
- 9.24. providing police protection, mail pickup and delivery or scheduling inspections associated with contract performance or inspections related to transit of goods across country;
- 9.25. providing phone service, power, and water supply, loading and unloading cargo, or protecting perishable products or commodities from deterioration; or e. actions of a similar nature.
- 9.26. C.2.4.2 The term "routine governmental action" does not include any decision by a Foreign Official to award or set the terms of new business or to continue business with a particular party, or any action taken by a Foreign Official involved in the decision-making process to encourage a decision to award new business to or continue business with a particular party. (Tit. 15 U.S.C. ((78dd 1(f)(3), 78dd 2(h)(4), 78dd 3(f)(4)).

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9.27. C.2.4.3 Accounting Provisions

9.28. The Act requires companies to maintain, in reasonable detail, accurate books, records and accounts that fairly reflect the transactions recorded, and to devise and maintain "sufficient" systems of internal accounting controls. Criminal liability may be imposed if a person knowingly circumvents or fails to implement a system of internal accounting controls or knowingly falsifies any book, record, or account. (Tit. 15 U.S.C. (78m(b)).

For a complete copy of the Foreign Corrupt Practices Act of 1977 go to:

<https://www.govinfo.gov/content/pkg/COMPS-9569/pdf/COMPS-9569.pdf>

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