



GOLDEN ARGOSY LLC
DELIVERING PERFORMANCE

Argosy Supplier Code of Conduct

Introduction and Foreword by The Executive Leadership Team

As a company with global business relationships and collaborations, Argosy is firmly committed to integrity and sustainability in all our business activities. We focus on compliance with internationally recognized ethical standards, considering the risks and opportunities related to the social and environmental impacts we may have in our operations and throughout our supply chain.

As a supplier to Argosy, you represent a vital link in our supply chain, and your contribution to achieving these high standards is fundamental. The standards expressed in this Supplier Code of Conduct comprise important criteria in our supplier selection and evaluation process.

Your commitment matters and is essential to our mutual success.

The Code of Conduct applies to all companies conducting business with these entities:

- Golden Argosy LLC
- Argosy International Inc.
- Argosy Advanced Materials LLC dba Argosy International
- Argosy Composite Advanced Materials LLC
- Argosy Shanghai Aerospace Material Ltd
- Argosy XAC Composites Material Ltd
- Argosy Japan Aerospace Materials Ltd., Nagoya Japan

1. Purpose and Scope

At Argosy, we are committed to conducting business with integrity, responsibility, and sustainability. We expect our suppliers to uphold the same high standards in their operations. This Supplier Code of Conduct outlines the ethical, environmental, and social responsibilities that our suppliers must adhere to as a condition of doing business with Argosy.

Our suppliers are required to comply with all applicable laws and other regulations of the respective countries in which they do business.

If any provisions of this Code of Conduct conflict with or modify the provisions of any existing contract between Argosy and the Supplier, the provisions of the contract with the Supplier shall prevail unless otherwise agreed.

2. Ethical Business Practices

Suppliers must conduct business in an ethical and transparent manner, adhering to the following principles:

- **Compliance with Laws and Regulations:** Suppliers must comply with all applicable local, national, and international laws and regulations.
- **Fair Business Practices:** Suppliers must prohibit all forms of bribery, corruption, extortion, and embezzlement.
- **Conflict of Interest:** Suppliers should disclose any potential conflicts of interest that may affect their relationship with Argosy and take appropriate measures to avoid situations that create the appearance of a potential conflict of interest.
- **Intellectual Property and Confidentiality:** Suppliers must protect Argosy's confidential information and respect intellectual property rights.
- **Fair Competition:** Suppliers must act in accordance with national and applicable international laws and regulations for fair competition and refrain from any kind of illegal agreement that unreasonably restricts competition.
- **Prevention of Money Laundering:** Suppliers must comply with legal obligations for preventing money laundering and not engage in money laundering activities.
- **Transparent Reporting:** Suppliers must ensure truthful, transparent, and complete reporting on business transactions in compliance with applicable legal rules and standards.

3. Environmental Sustainability

Argosy is committed to minimizing its environmental footprint and expects suppliers to implement environmentally responsible practices throughout their operations. Suppliers must:

Climate Impact & Emissions

- **Greenhouse Gas (GHG) Emissions:** Suppliers should monitor, document, and work to reduce greenhouse gas emissions across operations, including Scope 1 (direct), Scope 2 (indirect from purchased energy), and where possible, Scope 3 (value chain) emissions.
- **Decarbonization:** Suppliers should develop and implement strategies to progressively reduce carbon emissions, setting measurable targets aligned with science-based goals where feasible.
- **Air Quality:** Suppliers should implement controls to minimize release of harmful air pollutants including particulate matter, nitrogen oxides, sulfur oxides, volatile organic compounds, and other hazardous air pollutants.
- **Noise Emissions:** Suppliers should identify, control, and mitigate noise pollution that may affect surrounding communities and ecosystems.

Energy Management

- **Energy Efficiency:** Suppliers should implement systematic approaches to improve energy efficiency and reduce overall energy consumption.
- **Renewable Energy:** Suppliers should progressively increase the use of renewable energy sources (solar, wind, hydro, geothermal, etc.) in operations where feasible.

Water Stewardship

- **Water Quality & Consumption:** Suppliers should monitor and minimize water usage, implement water recycling systems where possible, and prevent water pollution by properly treating and disposing of wastewater.
- **Water Management:** Suppliers should implement water management systems that address water conservation, wastewater treatment, and prevent contamination of local water sources.

Materials & Resource Management

- **Responsible Chemical Management:** Suppliers should safely handle, store, and dispose of chemicals according to applicable regulations, maintain accurate records, and actively seek to replace hazardous substances with safer alternatives.
- **Sustainable Resource Management:** Suppliers should source raw materials responsibly with consideration for environmental impacts, giving preference to renewable, recyclable, and certified sustainable materials.
- **Waste Reduction:** Suppliers should implement programs to minimize waste generation throughout operations and product lifecycles.
- **Reuse and Recycling:** Suppliers should maximize opportunities for materials reuse, recycling, and responsible disposal of waste, aiming for a circular economy approach.

Biodiversity & Ecosystems

- **Biodiversity Conservation:** Suppliers should avoid activities that negatively impact biodiversity and implement practices that protect or enhance local ecosystems.
- **Land Use and Deforestation:** Suppliers should prevent deforestation and ensure land use practices minimize ecological impacts and maintain ecosystem services.
- **Soil Quality:** Suppliers should implement practices to maintain or improve soil health, prevent contamination, erosion, and degradation.
- **Animal Welfare:** Where applicable, suppliers should ensure humane treatment of animals and adherence to recognized animal welfare standards.

Environmental Management Systems

- **Environmental Regulations Compliance:** Suppliers should comply with all applicable environmental laws and regulations, including REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) and RoHS (Restriction of Hazardous Substances) directives where applicable.

- **Environmental Management System:** Suppliers should implement and maintain an environmental management system, preferably in accordance with ISO 14001 standards, to systematically manage environmental impacts.
- **Documentation and Reporting:** Suppliers should maintain appropriate documentation of environmental performance and be prepared to report on key environmental metrics upon request.
- **Continuous Improvement:** Suppliers should establish objectives and targets to continuously improve environmental performance over time.

Argosy encourages suppliers to go beyond compliance and demonstrate environmental leadership through innovative practices and technologies that reduce environmental impact across the supply chain.

4. Human Rights & Labor Practice

We expect our suppliers to uphold human rights and fair labor practices, respecting the dignity and rights of all individuals impacted by their operations. Suppliers must adhere to the following principles:

Safe & Healthy Work Environment

Suppliers must ensure safe working conditions, including appropriate protective equipment, emergency preparedness, and occupational health measures. Suppliers must comply with all applicable regulations and standards concerning the health and safety of their workers.

Suppliers should go beyond compliance requirements and foster a positive safety culture that encourages employee participation in safety improvements at all levels.

Child Labor and Young Workers

Suppliers must prohibit the employment of any individual under the legal minimum age for work in their respective country, as well as any involvement in hazardous or exploitative work. Suppliers must adhere to all applicable laws regarding the employment of minors and prohibit the employment of individuals under the legal working age in accordance with the ILO Minimum Age Convention. We strictly reject all forms of child labor throughout our operations and supply chain.

Modern Slavery

Suppliers must prohibit all forms of modern slavery, including slavery, servitude, forced or compulsory labor, and human trafficking. We do not tolerate the use of forced labor in any form and are committed to ensuring that all individuals working within our operations are doing so voluntarily and with full consent. Suppliers must work diligently to identify and eliminate any risk of modern slavery in their supply chain.

Fair Wages & Benefits

Suppliers must provide fair wages and equitable compensation in accordance with local labor laws, pay at least the locally applicable legal minimum wage, pay overtime in addition, and provide all legally required additional benefits. Suppliers must ensure that wages are sufficient to cover living expenses and maintain a decent standard of living for workers.

Suppliers must be committed to the principle of equal pay for equal work and regularly conduct compensation analysis to identify and address any gender or other discriminatory pay gaps. All workers should receive clear information about their wages, deductions, and benefits.

Working Hours

Suppliers must comply with laws on the restriction of working hours and neither make use of nor promote undeclared work and other illegal employment. Working hours, including overtime, shall not exceed the maximum set by local law and international standards. Overtime shall be voluntary, compensated at a premium rate, and not requested on a regular basis.

Ethical Recruiting

Suppliers must employ ethical recruitment practices, including transparency in employment terms, prohibition of recruitment fees charged to workers, and ensuring all workers understand their employment conditions. Employment contracts must be provided in a language workers understand.

- Ethical recruitment practices must include:
- Prohibition of recruitment fees paid by workers
- Provision of employment contracts in the worker's native language
- Clear communication of employment terms and conditions prior to relocation
- Verification that recruitment agencies and labor brokers comply with our standards
- Special protections for migrant workers, including assistance with work permits and visas

Freedom of Association and Collective Bargaining

Suppliers must respect the rights of workers to freedom of assembly, freedom of association, and collective bargaining in accordance with local laws and regulations. Suppliers must not discriminate or retaliate against workers for exercising these rights.

Non-Discrimination & Inclusion

Suppliers must not discriminate based on race, gender, religion, sexual orientation, disability, or other protected characteristics, and must provide a work environment free of physical, verbal, and psychological violence, sexual harassment, or other derogatory behavior.

Suppliers must implement proactive measures to prevent discrimination and harassment, including:

- Regular anti-bias and anti-harassment training for all employees
- Anonymous reporting mechanisms that protect complainants from retaliation
- Prompt, thorough, and impartial investigation procedures
- Regular review of hiring, promotion, and termination practices to identify potential biases
- Clear consequences for policy violations

Women's Rights

Suppliers must ensure equal opportunities and treatment for women in the workplace, including equal pay for equal work, protection from harassment, accommodations for maternal health, and support for women's advancement in the workplace. Suppliers must provide a workplace free from gender-based discrimination, sexual harassment, and exploitation.

Diversity, Equity, and Inclusion

Suppliers must recognize and value diversity in the workforce, ensuring that all individuals, regardless of their background, have an equal opportunity to succeed. Suppliers should promote a culture of inclusion and equity, where employees from diverse backgrounds can thrive, contribute, and succeed without bias or discrimination.

Rights of Minorities and Indigenous Peoples

Suppliers must respect the rights, cultural heritage, traditional knowledge, and traditional cultural expressions of minorities and Indigenous peoples who may be affected by their operations and engage in meaningful consultation with these communities.

Suppliers must recognize and respect the unique cultural, historical, and legal status of Indigenous peoples and take special measures to ensure their rights are protected, including:

Non-Discrimination & Inclusion

Suppliers must not discriminate based on race, gender, religion, sexual orientation, disability, or other protected characteristics, and must provide a work environment free of physical, verbal, and psychological violence, sexual harassment, or other derogatory behavior.

Suppliers must implement proactive measures to prevent discrimination and harassment, including:

- Implementation of Free, Prior, and Informed Consent (FPIC) processes before operations that may affect Indigenous communities
- Cultural sensitivity training for employees working with Indigenous communities
- Recognition of traditional knowledge and practices
- Support for Indigenous supplier development programs where appropriate

Land, Forest and Water Rights

Suppliers must respect legitimate land tenure rights and the rights of local communities to access and use natural resources. All land acquisitions or changes in land use must follow a transparent process with Free, Prior, and Informed Consent (FPIC) of affected communities.

Forced Eviction

Suppliers must prohibit forced evictions and provide fair compensation and alternative suitable accommodation when displacement is unavoidable, following appropriate consultation processes.

Use of Private or Public Security Forces

When engaging security personnel or working with public security forces, suppliers must ensure they operate in accordance with international human rights standards and applicable local laws. Security arrangements must not contribute to human rights abuse or community conflict.

Human Rights Due Diligence

Suppliers should conduct human rights risk assessments appropriate to their size and circumstances to identify potential adverse human rights impacts related to their operations. They must commit to remediation processes if they cause or contribute to such impacts. Suppliers must establish accessible grievance mechanisms for individuals and communities who may be adversely impacted by their operations.

Where suppliers identify that they have caused or contributed to adverse human rights impacts, they must provide for or cooperate in legitimate processes to enable appropriate remediation.

5. Responsible Sourcing

Suppliers must ensure responsible sourcing of materials, including:

- **Ethical Supply Chain Management:** Suppliers must ensure that their own suppliers comply with ethical and sustainability standards.
- **Conflict-Free Materials:** Suppliers must ensure that minerals and materials used in products do not contribute to human rights abuses in conflict-affected areas. Suppliers should do all that is reasonable to avoid raw materials from conflict areas that could potentially lead to human rights violations or financing of armed groups.
- **Sustainable Packaging:** Suppliers should minimize packaging waste and prioritize recyclable or biodegradable materials.
- **Counterfeit Components Prevention:** Suppliers must develop and operate effective methods and processes to avoid the risk of counterfeit components and materials being integrated into their products. In justified cases, suppliers must inform recipients of counterfeit components and exclude these components from delivery.

6. Data Protection and Information Security

Suppliers must ensure proper handling of data and information:

- **Data Protection:** Suppliers must collect, process, and use all personal data in accordance with applicable data protection regulations in a lawful, transparent, and secure manner.
- **IT Security:** Suppliers must protect confidential and proprietary information from unauthorized access, use, disclosure, modification, or destruction through appropriate security procedures.

- **Business Partner Data:** Suppliers must treat confidential information pertaining to their business partners properly and not use such information for purposes other than the intended business purpose without permission.
- **Insider Information:** Suppliers must not use non-publicly disclosed information as the basis for stock exchange transactions or enable third parties to trade with such insider information.

7. Monitoring & Compliance

Implementation by Suppliers

In accordance with the size and nature of their business, our suppliers shall establish appropriate management systems to support compliance with laws and regulations and adherence to the rules of conduct described in this Code within the supplier's company and along with its own supply chain.

Argosy expects its suppliers to establish their own rules of conduct in writing to create a binding basis for ethical and responsible behavior on the part of their employees and business partners. It is the responsibility of suppliers to inform and train their employees and their business partners along with their own supply chain about compliance with these standards and to monitor compliance by appropriate means.

Whistleblower Protection

Our suppliers shall give their employees the opportunity to express company-related or ethical concerns freely and independently of their function - Ensure that the identity of whistleblowing employees, as well as concerns raised in the course of any necessary investigations, are kept strictly confidential in accordance with applicable laws, in particular data protection laws.

Suppliers must establish accessible grievance mechanisms that are:

- Available to all workers and external stakeholders
- Easily accessible and in languages understood by all workers
- Confidential and designed to protect complainants from retaliation
- Transparent in process and timelines
- Supported by appropriate remediation processes

For whistleblower inquiries or to report concerns, please contact:
compliance@argosyinternational.com

Procedure in the Event of Violations

In the event of a breach of this Code of Conduct, whether caused by our Supplier, its employees, affiliates, or other companies involved in the performance of the contract, our Supplier shall immediately report the breach to their Argosy contact person.

The Supplier shall, upon notification of the breach, provide Argosy with all information necessary for an investigation of the incident, cooperate in the investigation and, if necessary, allow Argosy or its advisors to conduct an on-site investigation at the Supplier's premises.

8. Acknowledgment & Commitment

By doing business with Argosy, suppliers acknowledge and agree to comply with this Supplier Code of Conduct. Suppliers are expected to ensure that this Code is communicated, understood, and followed throughout their own organizations and supply chains.

We view the principles outlined in this document not merely as requirements, but as the foundation for building long-term, sustainable business relationships. Suppliers are encouraged to go beyond basic compliance and continuously improve their sustainability efforts, working collaboratively with Argosy to drive responsible business practices and innovations that benefit all stakeholders.

Argosy is dedicated to communicating the directives and objectives outlined in this policy to everyone within the organization, including suppliers, subcontractors, and business partners. Regular audits, training, and reviews are conducted to ensure that these standards are continuously met.

For any questions, clarifications, or suggestions regarding this Code of Conduct, please contact your Argosy representative or reach out to us at email: compliance@argosyinternational.com.



Paul Marks

Executive Chair & CEO