



**TRUE VELOCITY®**

**SUPPLIER CODE OF ETHICS  
AND BUSINESS CONDUCT**

## Introduction

This Supplier Code of Ethics and Business Conduct is an expression of the expectations that TV AMMO, INC, and all its affiliates (“TV”) hold for suppliers and third parties (“Suppliers”) and is an extension of *True Velocity’s Code of Ethics and Business Conduct*. TV enjoys an excellent reputation in all aspects of business ethics and compliance. It is our responsibility to preserve and promote that reputation through integrity, honesty and respect for others. TV’s continued success is dependent upon our Client’s trust and your ethical conduct.

TV is committed to achieving the highest standards of professionalism and ethical conduct in its operations. TV expects its Suppliers to exhibit conscientious and professional work behaviors, and high ethical standards. TV’s *Supplier Code of Ethics and Business Conduct* (“Code”) explains the minimum standards of integrity and business conduct TV expects of its Suppliers. TV expects Suppliers to require at least this same level of integrity and business conduct from their Personnel (Employees or subcontractors of Suppliers) as well as anyone outside their organization engaged to provide services for or with TV.

When we talk about business ethics, we are describing the commitments that make TV exceptional both in the marketplace and as an employer of talented professionals. We deal honestly and fairly with our Clients, partners, governmental reviewers, stakeholders and competitors, as well as with each other. Our reputation for integrity and excellence requires careful observance of the letter and the spirit of all applicable laws and regulations, as well as a conscientious regard for the highest standards of conduct and personal integrity. TV’s reputation is one of our most cherished assets, and it is incumbent on us all to protect that reputation.

This Code includes information about ethics and legal compliance. In conjunction with our other policies, it is intended to be a practical reference that you can use to help make good decisions. TV acknowledges that no code of conduct can address every situation that Suppliers may encounter. As a result, this Code is not a substitute for Suppliers’ own accountability and responsibility to exercise good judgment and obtain guidance regarding proper business conduct. Suppliers are encouraged to seek additional guidance and support from those within TV designated as responsible for their services for or with TV.

TV reserves the right to verify compliance with this Code through internal or external assessment mechanisms.

We thank you for your compliance with this Code of Conduct and look forward to a mutually beneficial business relationship.

## Compliance and Codes of Conduct

At a minimum, our Suppliers must comply with all applicable laws and regulations. Commensurate with the size and nature of their business, we expect our Suppliers to have management systems in place to support compliance with applicable laws and regulations. Suppliers must also comply with all terms and conditions as outlined in their relevant purchase order. We encourage our suppliers to implement and adhere to their own written codes of conduct, and to flow down similar principles to their own supply chain.

## Anti-Corruption

We have a zero-tolerance policy for any corrupt activity. Anyone conducting business on our behalf, including our Suppliers, are prohibited from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. We expect our Suppliers to have similar prohibitions against corrupt activity and to have proper safeguards in place to prevent such activity from occurring. At a minimum, our Suppliers must comply with all relevant anti-corruption laws and regulations such as the U.S. Foreign Corrupt Practices Act and the U.K Bribery Act.

We compete solely on the merits of our products and services and do not utilize gifts or business courtesies to gain an unfair advantage. We expect our Suppliers to ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, does not violate the rules and standards of the recipient's organization, and is consistent with reasonable marketplace customs.

## International Trade Compliance

We expect our Suppliers to comply with all applicable import and export laws, including but not limited to, the U.S. International Traffic in Arms Regulations and the U.S. Export Administration Regulations. Business must also be conducted in compliance with applicable economic sanctions, embargoes, and anti-boycott laws.

## Conflicts of Interest

We expect our Suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with TV. Even when taking steps to avoid these conflicts and potential conflicts of interest can still arise. We expect our Suppliers to timely disclose this information to TV and all other affected parties.

## Competition/Antitrust

We expect our Suppliers to conduct business in accordance with all applicable competition or antitrust laws and regulations. For example, Suppliers are expected to avoid business arrangements that unlawfully restrain competition, improperly exchange competitive information, involve price fixing, rigging of bids, or otherwise improperly restrict or impact competition.

## Quality and Product Excellence

We strive to uphold the integrity and quality of our products and services which are fundamental to our company's reputation and our ultimate success. The entirety of our products and services must meet accurate inspection, testing and quality criteria as per contract and government requirements. We expect our Suppliers to help us meet these standards of accuracy.

## Counterfeit Parts/Components

We expect our Suppliers to develop, implement and maintain methods and processes appropriate to their products and services to prevent counterfeit parts and materials being delivered. Effective processes should be used to detect, report and quarantine counterfeit parts and materials, and prevent such parts re-entering the supply chain. We expect our Suppliers to only use parts from Original Equipment or Component Manufacturers or their authorized sources, and to comply with applicable laws, regulations, and industry "best practice" protocols when conducting business with TV.

## Conflict Minerals

We expect our Suppliers to conduct appropriate due diligence to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries and report such findings to TV via the Conflict Minerals Certification.

## Recordkeeping

We expect our Suppliers to retain appropriate business records accurately and securely.

## Protecting information

We expect our Suppliers to properly protect information, including confidential, proprietary, and personal information. Where such information is held or transferred electronically, we expect our Suppliers to implement appropriate cybersecurity protocols and to notify us of any suspected or actual data breaches. Information should not be used beyond the scope of the business arrangement. We also expect our Suppliers to comply with insider trading laws and take steps to prevent employees from trading on nonpublic information.

## Human Rights and Trafficking

We expect our Suppliers to treat all people with respect and dignity, and to not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, coercion, abduction, or fraud for the purpose of exploitation.

## Child Labor

We expect our Suppliers to ensure that child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

## Non-Discrimination

We expect our Suppliers to foster an inclusive work environment and at a minimum to comply with all applicable non-discrimination laws and regulations. Employment opportunities should be provided without regard to race, ethnicity, religion, color, sex, pregnancy, national origin, age, military veteran status, or any characteristic protected by state or local law, or mental or physical disability, when the essential functions of the job can be performed with or without reasonable accommodation.

## Employee Health and Safety

We expect our Suppliers to comply with applicable health and safety laws and regulations.

## Drug-free workplace

We expect our Suppliers to maintain a workplace free from illegal drugs.

## Harassment

We expect our Suppliers to ensure that the work environment of employees is free from physical, psychological and verbal harassment, or other abusive conduct.

## Environment

We expect our Suppliers to operate in a manner that actively manages risk, conserves natural resources, prevents pollution, and protects the environment. We expect our Suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, as well as opportunities for business growth through operational and product stewardship.

## Reporting

We expect our Suppliers to provide employees with adequate reporting channels to raise ethical or legal issues or concerns without fear of retaliation.

For help with any comments, questions or concerns, please contact True Velocity's compliance department at the following:

### Contact Information

Email: [compliance@tvammo.com](mailto:compliance@tvammo.com)

Phone: 972-487-6500