



**LEADERSHIP. COMMITMENT. EXCELLENCE.**  
*empowering defense suppliers.*

## 3A Inc. Code of Business Conduct and Ethics

The Board of Directors of 3A Inc. has adopted this Code of Business Conduct and Ethics in order to promote ethical conduct and honest communication, compliance with applicable governmental laws and regulations, protection of company assets including confidential information, professional business practices and accountability. This covers a wide range of business practices. It does not cover every issue that may arise, but it sets out basic principles to guide employees as well as directors and shareholders. All must conduct themselves according to the letter and spirit of this code.

### 1. Compliance with Laws, Rules and Regulations

All employees must respect and obey the laws, rules and regulations of the cities, states and countries in which we operate. Although not all employees are expected to know the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel. Conflict of Interest

Employees must avoid creating or participating in a conflict of interest. Employees may not be employed by, act as a consultant to, or have an independent business relationship with any of the Company's customers, competitors or suppliers.

### 2. Competition and Fair Dealing

Our company seeks to outperform the competition fairly and honestly, in compliance with all applicable antitrust laws. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent or inducing such disclosures by past or present employees of other companies is prohibited. Each employee should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees.

### 3. Discrimination and Harassment

We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate discrimination or harassment of any kind. All forms of discrimination and harassment in the workplace based on race, color, creed, national origin, ancestry, religion, sex, pregnancy and childbirth or related medical condition, sexual orientation, gender, marital status, registered domestic partner status, age (40 or older), physical or mental disability, medical condition, or any other legally protected classification as defined by applicable law are prohibited. The Company prohibits unlawful discrimination in all aspects of employment, including in the terms and conditions of employment, including but not limited to hiring, compensation, promotion, discipline and termination decisions.

### 4. Health and Safety

3A strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are not permitted. Employees

Approved by: AEW

Nature of change: original issue

Original Date: 6/11/24

Change Date: n/a

400 2<sup>nd</sup> Street SW, Ste. 207, Cedar Rapids, IA 52404 (Main) 319-365-0662

[WWW.THREEAINC.COM](http://WWW.THREEAINC.COM)

should report to work in suitable condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated.

5. Record-Keeping

3A requires honest recording and reporting of information to ensure compliance with our obligation to make timely and accurate disclosures, and to promote sound business practices. All of 3A's books, records, accounts and financial statements must be maintained in reasonable detail, appropriately reflect 3A's transactions and conform to applicable legal requirements and to 3A's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation.

6. Confidentiality

Employees have an obligation to protect 3A's proprietary and/or confidential information. Employees must maintain the confidentiality of all 3A and third-party confidential information they receive, or have access to, as a result of their employment, except when disclosure is authorized by the Legal Department or required by laws or regulations.

7. Protection and Proper Use of Company Assets

All employees should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. Company equipment should not be used for non-Company business, though incidental personal use may be permitted.

8. Gifts, Meals and Entertainment

No gift or entertainment should ever be given to an employee, family member of an employee or agent unless it is: a non-cash gift, consistent with customary business or cultural practices, not excessive in value, cannot be construed as a bribe or payoff and does not violate any laws or regulations.

Many countries have laws that prohibit the offering, promising or providing of anything of value with the intent to improperly influence the person or to gain an unfair business advantage. For these reasons, 3A is not to give anything of value to officials or political candidates in order to obtain or retain business.

9. Independent Consultants, Contractors and Vendors

All consultants, contractors and vendors who provide items or services to the Company must comply with all applicable laws and policies.

10. Reporting Violations and Follow-up

A copy of the current Code of Business Conduct and Ethics shall be provided to each employee. Any updates made must be shared companywide upon publication.

Employees are encouraged to report any suspected violations of the code of conduct by reporting to their supervisor or a board member.

Suspected violations will be reviewed by the Board of Directors and follow-up action will be voted on. Possible consequences include verbal warnings, written warnings, suspension or termination.

Approved by: AEW  
Nature of change: original issue

Original Date: 6/11/24  
Change Date: n/a

400 2<sup>nd</sup> Street SW, Ste. 207, Cedar Rapids, IA 52404 (Main) 319-365-0662

WWW.THREEAINC.COM