

CORTEC Business Conduct Expectations

This document outlines the expectations CORTEC has for third parties that support our business. It reflects CORTEC’s commitment to integrity, legal compliance, safety, fair dealing, and responsible business conduct.

Introduction

At CORTEC, we believe strong business performance and long-term relationships are built on integrity, accountability, and respect. Our suppliers and contractors play an important role in helping us serve our customers, protect our people, and uphold the standards that define our business.

We expect all CORTEC employees, suppliers, contractors, authorized agents, and representatives to conduct business in a manner consistent with these principles and with the spirit of CORTEC’s Code of Ethics.

Our Commitment

CORTEC promotes ethical standards throughout its business dealings. It is our policy to uphold these standards to the highest possible level of integrity, even when laws or local business customs may be more permissive. While local customs and traditions should be recognized and respected, integrity must remain the foundation of how business is conducted.

By maintaining a reputation for integrity, CORTEC builds long-term business relationships that are essential to the success of the Company and to the trust placed in us by employees, customers, suppliers, contractors, authorized agents, and representatives.

Values

• Integrity in all business dealings	• Respect for people
• Trust and accountability	• Fair and ethical competition
• Protection of people, property, and the environment	• Compliance with applicable laws and regulations
• Commitment to quality, reliability, and responsible performance	

Human Rights and Employment Practices

CORTEC values its employees and supports a work environment built on dignity, fairness, and equal opportunity. We do not tolerate discrimination, harassment, forced labor, or child labor in any of our operations or facilities.

Updated: 20 August 2025

We expect our suppliers and contractors to uphold similar standards and to treat workers with dignity and respect.

- Providing a workplace free from unlawful discrimination and harassment
- Complying with applicable labor and employment laws
- Prohibiting forced labor, involuntary servitude, and exploitative labor practices
- Prohibiting child labor and unacceptably hazardous work involving minors

Compliance with Laws and Regulations

CORTEC is committed to compliance with all applicable laws and regulations in the jurisdictions where we do business. We expect our suppliers and contractors to do the same.

This includes compliance with laws relating to anti-bribery and anti-corruption, competition and antitrust, trade sanctions and export controls, data protection and confidentiality, employment and labor practices, and environmental, health, and safety requirements.

Anti-Bribery and Corrupt Practices

CORTEC will not make, offer, or agree to any unlawful payment, bribe, kickback, or other corrupt act to any customer, regulatory authority, or public official. We expect our suppliers, contractors, authorized agents, and representatives to uphold the same standard.

No third party acting on behalf of CORTEC may engage in conduct that violates applicable anti-corruption laws or creates the appearance of improper influence. All fees, commissions, and reimbursable expenses must be legitimate, reasonable, documented, and commensurate with the services provided.

Fair Competition and Ethical Business Conduct

CORTEC will not participate in business practices considered unethical or that may encourage unfair competition. We expect suppliers and contractors to conduct business honestly and fairly.

- Misrepresenting products or services
- Making false or inaccurate statements about competitors
- Unlawfully obtaining or disclosing another party's proprietary or confidential information
- Participating in conduct that violates applicable competition or antitrust laws

Conflicts of Interest

Business decisions should be made impartially and based on sound business reasoning. CORTEC employees are expected to identify and avoid conflicts of interest, and we expect suppliers and contractors to support that standard.

- Gifts and entertainment must be modest in value, unsolicited, and consistent with accepted business practice
- Gifts, entertainment, favors, commissions, or rebates must never be used to influence a business decision or create the appearance of impropriety
- Any business relationship involving a potential personal, financial, or family conflict should be disclosed and reviewed appropriately

Confidentiality and Data Protection

CORTEC employees, suppliers, contractors, authorized agents, and representatives are expected to protect confidential information associated with CORTEC and with our customers, employees, suppliers, and business partners.

- Safeguard confidential, proprietary, and sensitive business information
- Use such information only for authorized business purposes
- Comply with applicable data protection and privacy laws
- Prevent unauthorized use, disclosure, access, or distribution of confidential data

Protection and Proper Use of Assets

CORTEC's tangible and intangible assets, including inventory, equipment, software, processes, intellectual property, and business information, are to be used only for legitimate business purposes.

We expect suppliers and contractors to respect CORTEC property and intellectual property rights and to refrain from unauthorized use, disclosure, or misuse of company assets or information.

Trade Compliance, Sanctions, and Supply Chain Integrity

CORTEC is committed to compliance with laws and regulations concerning economic sanctions, trade embargoes, export administration, and related trade restrictions of the United States and other applicable jurisdictions.

- Comply with all applicable import, export, and sanctions laws
- Source goods and services from lawful and trusted sources
- Maintain appropriate documentation regarding country of origin and supply chain integrity
- Avoid supplying goods, services, or materials prohibited by law or regulation

Safety, Health, Environment, and Operational Responsibility

CORTEC expects suppliers and contractors to conduct business in a manner that protects people, property, and the environment. Safe operations, responsible practices, and compliance with environmental, health, and safety requirements are essential to our business.

- Comply with applicable environmental, health, and safety laws and regulations
- Maintain safe working practices and promote hazard awareness
- Protect employees, contractors, visitors, and the public from preventable harm
- Conduct operations in a manner that minimizes environmental risk
- Support a culture in which unsafe work can be reported and addressed without fear of retaliation

Accounting, Records, and Business Transparency

CORTEC will adopt and maintain accounting systems and procedures appropriate to the needs of the business and in accordance with applicable accounting principles and regulatory requirements.

We expect suppliers and contractors to maintain accurate books, records, and documentation relating to their business with CORTEC, including records associated with payments, services performed, country of origin, and compliance-related matters.

Political Contributions

CORTEC will not make any donation, financial or material, intended for or in support of political influence. Suppliers, contractors, authorized agents, and representatives acting on behalf of CORTEC must not make political contributions or expenditures intended to improperly influence business decisions or government action in connection with CORTEC business.

Due Diligence in New Territories and Third-Party Relationships

Prior to entering new territories or engaging certain third parties, CORTEC may conduct company-approved due diligence appropriate to the circumstances. This may include review of the background, qualifications, ownership, reputation, and legal compliance history of potential agents, representatives, suppliers, or contractors, to the extent permitted by law.

We expect our third-party partners to cooperate with reasonable due diligence inquiries and compliance reviews.

Reporting Concerns and Whistleblower Protection

CORTEC is committed to appropriate conduct by its employees, suppliers, contractors, authorized agents, and representatives. We expect suspected misconduct, unethical behavior, or violations of law or company policy to be raised promptly.

In addition to CORTEC's open-door approach for reporting concerns to management and/or the Chief Financial Officer, employees may also report anonymously any potential or suspected misconduct, as well as suggestions or concerns, directly to the Human Resource Director.

CORTEC does not tolerate retaliation against anyone who, in good faith, reports suspected misconduct, a policy violation, or a legal concern, or who cooperates with an investigation.

Compliance with This Standard

CORTEC employees are required to follow company policy and act with honesty and integrity. We expect the same from our suppliers, contractors, authorized agents, and representatives.

Failure to comply with these expectations may result in corrective action, up to and including termination of a business relationship, and where applicable, referral to appropriate authorities.

Reference Basis: Adapted from CORTEC's internal Code of Ethics and prepared as an external-facing expectations document for suppliers and contractors.