

SUBJECT: Ethical Business
Conduct
NUMBER: 201
VERSION: 2
EFFECTIVE: May 15, 2024



Brad Williams, President

Cadre Policy 201

1. PURPOSE AND SCOPE

It is the policy of Cadre Holdings, Inc., on behalf of itself and its subsidiaries, (collectively, the “Company” or “Cadre”), to comply fully with all applicable laws and regulations governing its operations and to conduct business in an ethical and transparent manner. Policy means this Cadre Policy 201 and the Code of Conduct, which is incorporated by reference herein. This Policy sets out the standards and rules of business conduct for Cadre.

2. POLICY

Cadre is guided by *The Organizational Sentencing Guidelines*, as well as basic principles of ethical conduct, in support of Cadre’s Ethics and Compliance Program (the “Program”. The Program is designed to protect the Company’s reputation and ensure the protection of the Company’s assets. The implementation and consistent enforcement of the Program helps prevent, detect, remediate, and report misconduct. The Program is principles-based and fosters a culture that places the highest value on integrity, honesty, accountability, openness, and respect.

The Program strives to:

- Promote and support ethical conduct and compliance with those laws and regulations that impact our business;
- Help associates recognize, appreciate, and resolve ethical dilemmas and issues; and,
- Strengthen the links between our Code of Conduct, our Vision, Mission and Values, and ethical business conduct.

3. APPLICABILITY

This Policy applies to all Cadre businesses, as well as their directors, managers, officers and associates and to their respective relationships with any other party, including the Government, business partners, customers, suppliers, subcontractors and competitors. This Policy applies to all aspects of Cadre’s business wherever conducted and whenever individuals are acting or appearing to act within their scope of employment or position with the Company.

4. RESPONSIBILITIES

The Company’s executive management and each functional leader shall ensure, to the extent necessary, the implementation of this Policy. Company-wide direction and management of the Program rests with the Vice President, Legal.

Each director, manager, officer, associate, and third-party representative acting on behalf of the Company is individually responsible, by action and supervision as well as continuous review, to ensure strict compliance with this Policy.

The Vice President, Legal is responsible for furnishing advice with respect to the interpretation and application of this Policy.

The Vice President, Legal is initially responsible for reviewing any allegations of a violation of this Policy. The Vice President, Legal shall promptly report to the Chair of the Audit Committee of the Company's Board, and outside counsel thereof, any allegations of a purported violation of this Policy.

Upon determining that an investigation into any allegation is warranted, the Vice President, Legal will follow the Company's Internal Investigation Policy, which details the process for the investigation, findings and recommendations.

5. VIOLATIONS

Every director, manager, officer, and associate have the affirmative obligation to promptly report to the President, the Vice President, Legal, the Ethics Helpline, executive management or functional leaders and/or any other reporting channel, as appropriate, in good faith any suspected violations of this Policy

Such reports can be made anonymously, and shall be referred to the Vice President, Legal. The results of an internal investigation will allow Cadre to take appropriate remedial measures, if necessary, to (1) discipline any employee who committed misconduct and (2) prevent future similar misconduct.

Any director, manager, officer, associate, or third-party representative acting on behalf of the Company who violates this Policy, shall be subject to investigation and disciplinary action, up to and including termination and/or the reporting of any such improper activities to appropriate governmental authorities

Any confirmed violations of this Policy shall be reported to the Vice President, Legal. Any associate found to have violated this policy may be subject to disciplinary action, up to and including termination.

6. EXCEPTIONS

Any exceptions to, or deviations from, this Policy requires prior written approval from the Vice President, Legal.

7. DISTRIBUTION

This policy is to be distributed to all Cadre associates.

Policy History

Version	Date	Description	Originator
1.0	02.01.2016	Initial policy release	Julio Salvador
2.0	14.5.2024	Cadre Refresh	T. Barrett-Ryan