



Pride in Our Principles

CODE OF CONDUCT

CADRE
HOLDINGS



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CORE VALUES



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A Message From Our President

For over 60 years, Cadre Holdings, Inc. ("Cadre" or "Company") has been a global leader in the manufacturing and distribution of safety equipment, including body armor, explosive ordnance disposal, duty gear and nuclear safety products, among other products and services, for professionals, such as first responders, law enforcement and public safety, military, EOD technicians and many more.

From modest beginnings, our Company has grown into an industry leader, offering a full line of innovative products with an exceptional reputation for quality, and bound by our Mission embodied in "Together, We Save Lives," which lives in the hearts and minds of all of our associates around the world. This Mission is supported by our Cadre Operating Model ("COM"), which encompasses a behavior-based, leadership-centric, operating model that enables us to create greater value for our customers and stakeholders by guiding how we work, innovate, solve problems, improve and engage with each other, our customers and our communities.

This Code of Conduct ("Code") is an important tool in meeting Cadre's Core Value of Integrity and ensuring that our associates understand and take personal **Pride in Our Principles**. For over six decades, we've lived by these Principles and brought them to life each day. The success of our Company, the preservation of our high standards and the fulfillment of our workforce rests upon them.

The work we do here matters. I want to thank you for being part of this vital Mission and challenge you to be part of the important work yet to be done.

Never forget to take Pride in what you do and the way you

Brad Williams

President, Cadre Holdings, Inc.



Live Our Core Values

Our Core Values form the compass that guides our work. When our Core Values become a part of who we are, what we do each day, they inspire our choices and ground every action in our shared purpose.



MISSION

Together, We Save Lives



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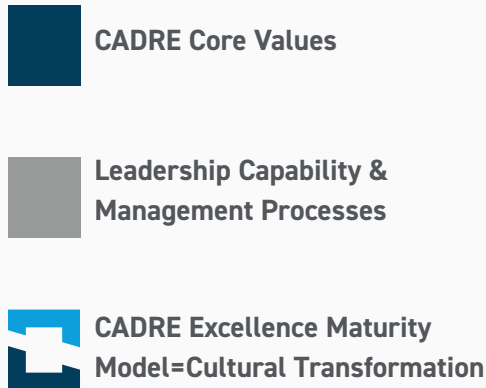
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CADRE OPERATING MODEL

The CADRE Operating Model is our business strategy to attain and sustain exceptional results. It is a behavior-based, leadership-centric, operating “way” that enables us to create greater value for our customers and stakeholders. It guides how we work, innovate, solve problems, improve and engage with each other, customers and communities.



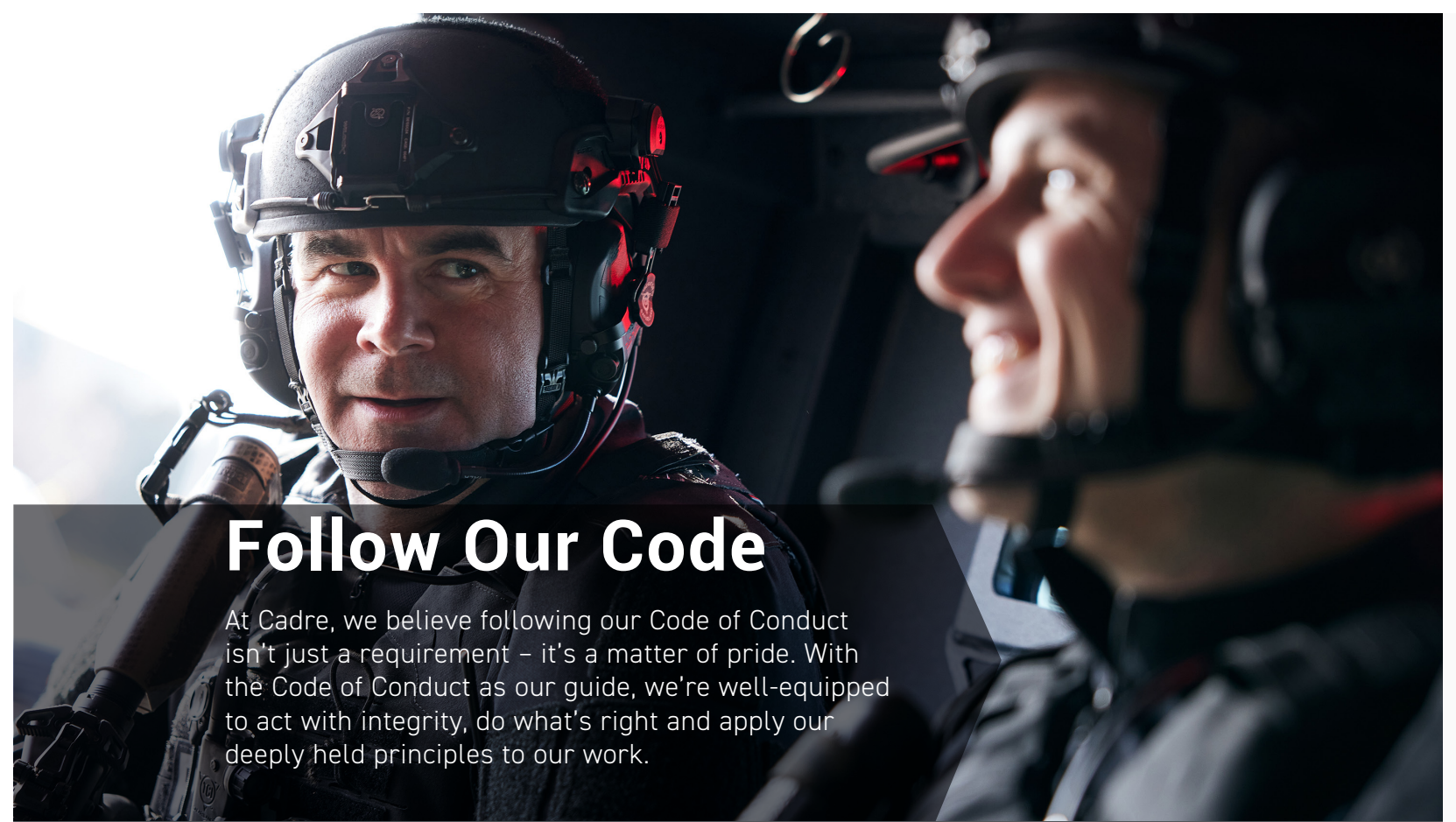
Honor Our Legacy

TOGETHER, WE SAVE LIVES

We take **Pride in Our Principles**, especially in our guiding principle and Mission Statement: Together, We Save Lives®. Our Mission comes to life through the Saves Club®, which pays homage to first responders who experience a life-threatening incident in the line of work in which our armor or duty gear contribute to saving their lives. Saves Club presentations provide both powerful tributes to these officers and a testament to our associates of our Mission Statement.

Code of Conduct

As a publicly traded company, Cadre maintains a [Code of Conduct](#) setting out the basic principles which directors, officers, employees, agents and representatives (including consultants) of Cadre Holdings, Inc., its subsidiaries and affiliates are expected to abide by, and thus, incorporated by reference in this Code of Conduct.



Follow Our Code

At Cadre, we believe following our Code of Conduct isn't just a requirement – it's a matter of pride. With the Code of Conduct as our guide, we're well-equipped to act with integrity, do what's right and apply our deeply held principles to our work.

Learn About Our Code

Our Code of Conduct reinforces our culture and Core Values. It's the resource we rely on to make good decisions for our Company and everyone we serve.

Abiding by the law ...

Complying with Company policies ...

Acting ethically in every aspect of our business ...

These are the qualities that define our Company's culture and our Core Values. As a member of the Cadre team, each of us has the power to strengthen our culture by upholding our Code of Conduct every day. The Code spells out what the Company expects from us and guides us to show integrity as we conduct our business, work together and interact with customers, suppliers and other business partners.

The Code can't cover every possible issue that may arise, but it is the best place to start when you have questions. If you can't find the answers you need in the Code, reach out to your manager or supervisor, the [Legal & Compliance department](#) or [other resources](#) listed in the Code.

THE CODE IS ...

Company policy. Complying with the Code is a condition of your employment with the Company.

THE CODE IS NOT ...

A contract. It also doesn't change the at-will employment status of associates in the United States.



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Who Must Follow This Code

We require all Cadre associates, directors, officers, agents and third parties (including distributors, consultants and temporary and contract associates) to read, understand and follow our Code, which has been approved by our President and senior management. We also require anyone else who acts as an extension of our business (such as suppliers and business partners) to follow the spirit of our Code, along with any applicable contractual provisions.

If you supervise our suppliers and business partners, communicate with them about our Company's standards and make sure they are understood. We may terminate the contract of any supplier or business partner that fails to meet our ethics and compliance expectations or their contractual obligations.

Violations

We take violations of our Code, policies or the law seriously. They expose our Company to risk and our reputation to harm. They also violate the trust we've worked so hard to build. For that reason, any director, officer, manager, supervisor or associate who violates our Code or policies could face disciplinary action, up to and including termination of employment. Third parties, such as distributors and consultants, who violate the Code could also face immediate termination. If a law or regulation has been broken, those involved (and our Company) could also face criminal



DID YOU KNOW?

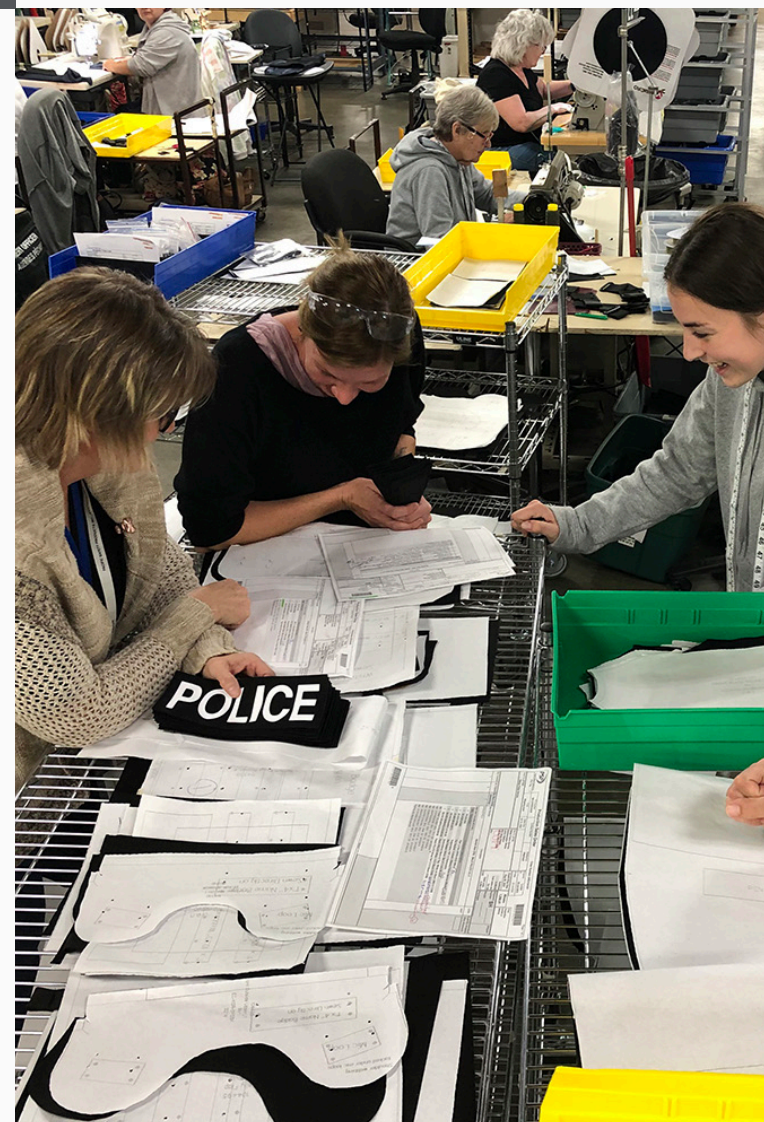
It violates our Code to:

- Ask, encourage or pressure others to violate the Code
- Fail to promptly report concerns of suspected misconduct

or civil sanctions or penalties.

Accountability and Waivers

Any waiver of this Code of Conduct requires prior written approval of the President of



Know Your Responsibilities

Our success depends on our reputation as an ethical company, and we each play an important role in preserving it. By embracing our shared responsibilities, we foster a culture of teamwork, compliance and accountability.

Associate Responsibilities

- Follow this Code of Conduct and other Company policies, procedures and guidelines.
- Act professionally, honestly and ethically when conducting Company business and avoid even the appearance of improper conduct.
- Complete all required associate training and stay up to date on current standards and expectations.
- Report concerns of possible violations of our Code, our policies or the law to your manager, supervisor or any of the resources listed in this Code.

Special Duties of Managers and Supervisors

- Serve as a role model for integrity and compliance in every interaction.
- Prioritize compliance over business results.
- Ensure that you understand your responsibilities, and that your associates, subsidiaries, affiliates and third parties understand our requirements and applicable law.
- Encourage an environment where associates feel comfortable raising questions and concerns without fear of retaliation.
- Address associate concerns or questions in a professional and timely manner. When a concern is brought to your attention, treat it seriously and with respect for everyone involved.
- Offer appropriate guidance that doesn't compromise our standards of integrity or our commitment to compliance in order to

achieve business results.

Compliance With Law

Cadre is committed to complying with all laws, rules and regulations that apply to our business. Be aware that laws are complex and subject to change and vary from country to country. We must all understand Company policies and procedures and applicable laws relating to our jobs and seek help if we ever

IF THE CODE AND THE LAW CONFLICT

Be aware, if you find that any part of this Code conflicts with applicable laws or regulations (including local requirements), the law or regulation applies. Contact the Legal & Compliance department for guidance.





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WHAT TO DO

- Learn about and follow the laws and regulations of the jurisdictions, countries or regions where we operate as well as the key regulatory agencies that affect your work.
- Coordinate with business or legal experts when responding to requests from regulators.
- If you are a manager or supervisor, educate and monitor your team's compliance with applicable laws and regulations. Promptly raise any concern you or others may have about possible violations of Company policies or laws, and cooperate with Company investigations that may result.

WHAT NOT TO DO

- Don't take action if you are unsure if an action is appropriate or legal.
- Don't ignore any red flags or potential issues that could lead to a regulatory compliance breach.



Make Good Decisions

Our Company's performance is based on the decisions we make every day, so we must make them carefully and responsibly.

Choosing What's Right

It's critical that each of us makes decisions that are fact-based and aligned with our Code, policies and applicable laws and regulations. They must also support our Mission, Vision and Core Values. Although decision-making is a routine part of your job, situations can sometimes arise that require careful consideration.

WHAT TO DO

Follow these steps to help you make sound decisions:

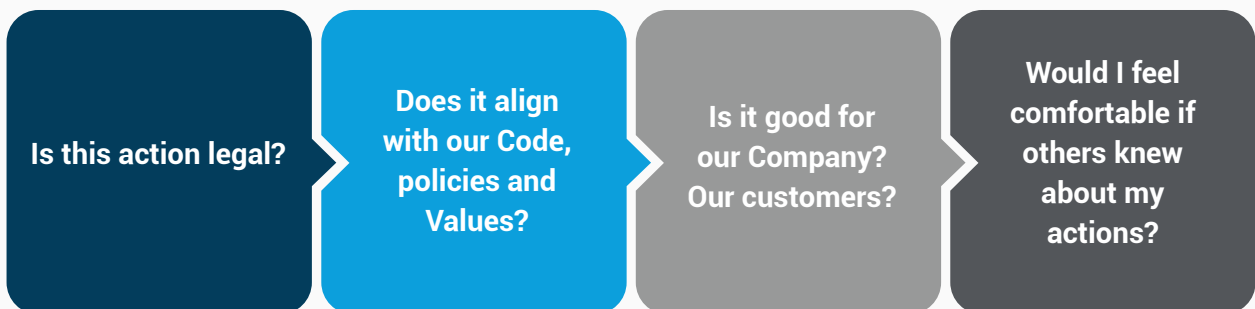
- Evaluate the situation.
- Check the rules.
- Consider the consequences.
- Consult with others.
- Use good judgment.
- When in doubt, seek guidance from your manager or supervisor.

WHAT NOT TO DO

- Don't make decisions that compromise our Company's integrity.
- Never choose to do something that could violate our policies or applicable laws and regulations.

Not Sure What to Do?

If you're facing a difficult decision, try asking yourself:



Make sure you can answer "yes" to every question. If so, the action is probably acceptable. If the answer to any question is "no" or "maybe," stop and seek guidance. Remember, it's always best to ask first, act later.



Raise Your Voice

To build a culture of excellence and continuous improvement, we believe in making sure every voice is heard and valued.

Getting Help and Reporting Concerns

While our Code and Company policies provide guidance on conducting business ethically, there may be times when you need more help making the right decision. Your manager or supervisor is usually your best resource for help, but if that person isn't available or can't address the matter, or you're not comfortable discussing it with them, there are other resources available:

- Functional or site leadership
- Your local Human Resources representative
- Legal & Compliance department



Ethics Helpline



If you aren't comfortable speaking up to the resources listed here, there is another option: the Ethics Helpline. This service is operated by an independent third party, 24 hours a day/seven days a week. Associates everywhere may use this service to report suspected misconduct in many languages. When contacting the Ethics Helpline, you may choose to remain anonymous where permitted by law, but we encourage you to give your name and contact information to help us ensure appropriate action and follow-up. We will handle all reports of misconduct promptly, professionally and with the highest degree of confidentiality possible.

When you make a report, we expect you to report in good faith. That means you have reason to believe what you're reporting is true. Never use Company resources to make intentionally false or misleading reports. Like other misconduct, intentionally filing a bad-faith report may result in disciplinary action up to and including termination.

REPORTING ACCOUNTING CONCERNS

Be aware that special rules apply to the way we handle complaints about accounting, internal accounting controls or auditing. Be sure to read our Complaint Procedures for Accounting and Auditing Matters, which describes our procedures for the receipt, retention and treatment of these complaints.

Access the Ethics Helpline

 By phone:	
From an outside line, dial the One Connect number for your location:	
Belgium	0800 27 152
US and Canada	1-866-830-5772
UK	0808 281 5661
France	0800 90 91 70
Germany	0800 081 4363
Lithuania	0800 80023
Mexico	800-872-1960
Italy	800-826-977
 Or online:	cadreholdings.ethicspoint.com

Non-Retaliation

Cadre believes in maintaining an environment where associates can raise questions and share concerns about potential misconduct without fear of retaliation. We will not tolerate retaliation against anyone who raises a concern in good faith, reports potential misconduct or assists with an investigation. In fact, any associate who retaliates (or encourages others to retaliate) against an individual who has reported a concern could face disciplinary action. We know it takes courage to speak up. When you do report concerns, you help our Company detect problems and address them at the earliest possible stage.



Cooperate With Investigations

We are careful to conduct thorough, prompt and complete investigations, and each of us, when called upon, has a duty to cooperate.

Internal Investigations

The way we conduct investigations is critical at Cadre. They must be conducted lawfully, promptly, thoroughly, professionally, fairly and confidentially. That is why our Legal & Compliance department has established processes and procedures that ensure our internal investigations are conducted properly and by qualified personnel.

When you have a concern about suspicious behavior, your first responsibility is to immediately report it. If you are asked to assist in an internal investigation, audit, accounting review or to fulfill other requests from the Legal & Compliance department involving a lawsuit or government investigation, we expect you to cooperate. Never conduct your own fact-finding mission or interfere in an internal investigation.

There may be times (when legally required or otherwise appropriate) Cadre will self-report compliance violations to government authorities and cooperate with resulting investigations. Our President and Vice President, Legal, or their designees, will determine if and when to self-report compliance violations or refer them to government authorities.

DURING AN INVESTIGATION

- We will treat everyone involved with dignity and respect.
- We will comply with all applicable policies (this applies not only to all investigations, but also to any resulting corrective action).
- We will not tolerate retaliation against anyone who cooperates.

AFTER AN INVESTIGATION

- We will take appropriate disciplinary and other corrective action, as warranted.
- If a law has been broken, we will notify government authorities and cooperate with any resulting prosecution or other government action as required.



A person wearing a white protective suit, a white hard hat with a logo, and a respirator mask is operating a surveying instrument. The background is a blurred outdoor setting.

Protect People and Partnerships

People are the heart of our Company's business. We respect and protect everyone we work with and build lasting partnerships based on teamwork and trust.

Ensure Fair Employment Practices

When we respect the diversity of our workplace, we create an inclusive environment where everyone can perform to their highest potential.

Equal Opportunity Employment and Non-Discrimination

Our Vision can only be realized with the full commitment and cooperative spirit of our diverse workforce. At Cadre, we work as a team, as colleagues, with the same Mission for all – Together, We Save Lives. Maintaining that focus, we respect one another, value each other's contributions and treat everyone fairly.

We are an equal opportunity employer. That means we comply with all applicable anti-discrimination laws, orders, directives and requirements. Cadre is an equal opportunity employer and a government contractor. That means we comply with all applicable anti-discrimination laws, executive orders, directives and requirements.

If you supervise or make employment decisions on our Company's behalf, don't discriminate in any employment decision with regard to race, color, religion, gender, national origin, age, disability, marital status or status as a veteran. Base your decisions on objective, quantifiable standards like skills and qualifications and don't allow bias or any unrelated considerations into your decision-making.

WHAT ARE EMPLOYMENT DECISIONS?

They include:

- Recruitment and employment
- Promotion
- Demotion
- Transfers
- Layoff and termination
- Rates of pay and other forms of compensation
- Education and training
- Other working conditions

Our policy is simple. We do not discriminate in these or any other employment decisions.

Wages

A key component of ensuring fairness in the workplace is following labor and employment laws and regulations, including those related to wages and hours. Cadre is committed to upholding all applicable wage laws regarding legally mandated benefits and compensation, including minimum wage rates and overtime pay.



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Promote Respect

We're committed to keeping our workplace a welcoming place for everyone, free from discrimination or harassment.

We strive for a respectful, courteous work environment and will not tolerate sexual or other harassment by any associate, distributor, vendor, customer or visitor. This behavior doesn't just violate our policy – it may also be against the law and could lead to corrective action, up to and including termination. Offenders may also be personally liable for any legal and monetary damages.

We strictly prohibit unlawful harassment or discrimination because of sex, race, color, national origin, ancestry, religion, creed, physical or mental disability, marital status, medical or any other basis protected by federal, state or local law. No matter what form harassment takes, we will not tolerate it.

WHAT IS HARASSMENT?

It is any behavior that is:

- Personally offensive
- Intimidating or hostile
- Harmful to morale
- Negatively impacting work performance

Or sexual harassment, which involves:

Unwelcome actions such as sexual favors or requests that are made a condition of employment or used as the basis for employment decisions. It also includes sexual advances, insulting jokes or other offensive behavior.

Cadre expects each of us to report any behaviors that are threatening, discriminatory or intimidating. We take all reports seriously, investigating and addressing them with appropriate corrective action.





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✓ WHAT TO DO

- When you observe inappropriate or unacceptable behavior, recognize your obligation to take action.
- Either talk to the person involved, discuss the matter with your manager or supervisor or seek advice from your local Human Resources or Legal & Compliance department. Or contact the [Ethics Helpline](#).

📌 CHECK POINT

My boss is making me feel uncomfortable with his inappropriate comments and jokes. I have asked him to stop many times, but he ignores my requests. I'm worried if I tell someone else, he'll make things difficult for me or even fire me. What should I do?

Discuss the issue immediately with Human Resources or your supervisor's manager. Or call the Ethics Helpline. Our Company does not tolerate inappropriate behavior or retaliation against anyone who raises issues in good faith.

✗ WHAT NOT TO DO

- Avoid conduct and statements that are degrading, offensive, humiliating or intimidating to others. Seemingly innocent actions can create an environment that may be offensive to others.



Protect People and Our Environment

We are committed to providing a safe and healthy workplace while protecting the environment. It's essential for the long-term sustainability of our Company and our world.

Safety, Health and Environment (SHE)

At Cadre, our goal is for everyone to leave work in the same condition they arrived in and to promote environmental sustainability. Achieving this goal takes teamwork – each of us identifying, minimizing and managing risks to people and the environment and following Company policies and procedures, as well as applicable laws and regulations. We fulfill this commitment in everything we do, from our plant operations to our office work, designing and selling our products, training, providing retail support and customer service, driving vehicles on Company business and much more.

✓ WHAT TO DO

- Embrace the Red Zone/Green Zone Program.
- Ensure compliance with applicable SHE regulations and standards, including federal, state and local safety and environmental regulations.
- Notify your manager, supervisor or SHE Specialist immediately if you discover any unsafe or unlawful conditions including those not in keeping with safety compliance standards.
- Assess and understand the risks of a task before you begin. If you are not comfortable with the skills involved to complete the task or are unfamiliar with the equipment, stop and ask for assistance.
- Eliminate unreasonable safety, health and environmental risks from our facilities and services and report accidents, injuries and unsafe conditions.
- Always use the least hazardous chemical and minimize impact to the environment by recycling and conserving energy.
- Be prepared for emergencies, whether technological, natural or human-caused. Practice emergency response drills and evacuations and comply with our business continuity plans, including departmental plans and emergency notifications.
- Follow safe practices and processes when handling hazardous chemicals or materials.
- Consider safety, health and environmental impacts when designing and manufacturing our products and services.



✗ WHAT NOT TO DO

- Don't perform work tasks without utilizing personal protective equipment (PPE).
- Don't use chemicals that are improperly labeled or not approved for use in our facilities.
- Don't disable safety interlocks or operate machines without all guards in place.
- Don't leave damaged electrical conduit or unsafe electrical wiring exposed.
- Don't work on electrical or powered equipment without following lockout/tag-out procedures.
- Don't block emergency exits or aisles leading to exits.
- Don't text or use a handheld device while driving on Company business or travel. Texting while driving, as well as using handheld devices, violate both our policies, and in many countries, the law.
- Don't store hazardous materials and chemicals in the path of storm water flow.
- Don't participate or work in unsafe, latent conditions that may cause injuries or property damage.
- Don't operate or use any equipment without proper certification, training or applicable licenses (e.g., forklift operation).

HELP US HAVE A LIGHTER FOOTPRINT

Look for ways to "Reduce, Reuse and Recycle":

- Cut down waste.
- Shut computers down each evening.
- Turn lights off.
- Print in black and white instead of color.
- Use recycle bins for paper, aluminum and plastic.



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Security

In today's world of increasing threats, protecting the security of our people and workplaces is critical. Criminal acts, theft, damage, careless waste and lapses in security all have a direct impact on our success as individuals and as a Company. Cadre is committed to taking necessary measures to ensure a secure and safe work environment. As associates, each of us has a duty to help.

EACH OF US ALSO HAS A DUTY TO PREVENT:

SUBSTANCE ABUSE

We promote high standards of health for our associates and expect you to come to work ready to work. That is why we prohibit the use, possession, manufacture, distribution or sale of any illegal drug or alcoholic substance at any Cadre location.

WORKPLACE VIOLENCE

We believe our associates should be protected on our premises and have a workplace free of threats or acts of violence, harassment, intimidation or other disruptive behavior. Each of us must help ensure that no one, including associates, applicants, customers, vendors or contractors or members of the public ever feels threatened verbally, physically, via email or any other method of communication. We do not tolerate this activity by anyone on Company property

OUR ZERO TOLERANCE POLICY

We do not tolerate associates, applicants, customers, vendors, visitors or contractors who:

- Make threats
- Engage in threatening behavior
- Commit acts of violence against others



WHAT TO DO

- Know and follow our security policies and procedures.
- Protect your badge and wear it at all times. Notify your manager or supervisor or local SHE Specialist immediately if your badge is lost or stolen.
- Exercise due diligence and conduct appropriate background checks for all permanent and temporary associates, contractors and vendors.
- Make sure all visitors are registered before entering our facilities.
- Follow the visitor procedures for your location, which include always accompanying visitors throughout their time in our facilities.
- Notify your manager or supervisor or SHE Specialist immediately if you see unauthorized visitors on the premises.
- Notify your manager or supervisor or SHE Specialist if you discover an open door or unusual situation that could compromise our security.
- Follow Company travel policies. This includes checking for travel advisories before traveling abroad.



WHAT NOT TO DO

- Don't loan your badge out or let anyone else use it.
- Don't travel overseas without filing a travel plan.
- Don't allow guests into our facilities

Protect Personal Data

Cadre is committed to handling personal data responsibly, safely and in line with privacy laws.

An increasing number of countries around the world are more stringently regulating the collection and use of “personal data.” In addition, many countries regulate personal data of company representatives in business-to-business transactions.

For these reasons, we respect individuals’ personal information. We follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing and disposing of personal information.

WHAT IS PERSONAL INFORMATION?

It includes anything that could be used to identify someone, either directly or indirectly, including:

- Name
- Birth date
- Associate number
- Home address or office contact information
- Email address
- Phone number
- Credit card number
- Financial information
- Personal health information

Learn to recognize this and other personal information and follow our policies and the law to protect it.

✓ WHAT TO DO

- Refer any request for associate personal information to the Legal & Compliance department.
- Understand and comply with our privacy policies, applicable laws in the countries where we operate and relevant contractual requirements.
- Collect, process and use personal data (whether it relates to Cadre or its customers, vendors or business partners) for legitimate business purposes only and with care.
- Restrict access to personal data to individuals who need it for a legitimate business purpose.
- If you are aware of any use of personal data that violates our policies, report it immediately.
- Immediately notify IT through our internal ticketing system or the Legal & Compliance department if you learn that the security of any system or device containing personal data has been compromised.





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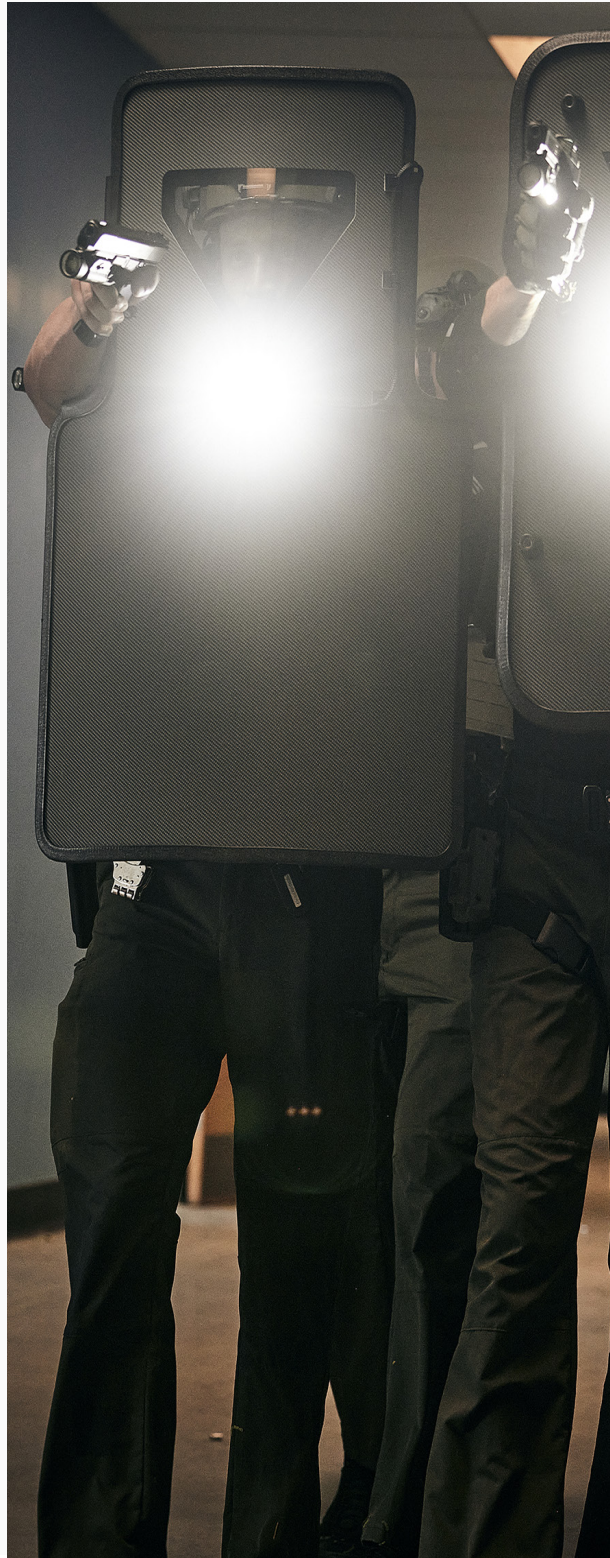
✕ WHAT NOT TO DO

- Don't share personal data with third parties, such as customers, vendors or business partners.
- Don't email or distribute personal data without requisite permissions and adequate security and access controls.
- Don't disclose any personal information of current or former associates to customers or vendors.
- Don't provide references about current or former associates.
- Don't email or distribute personal data to individuals without a need to know.
- Don't leave printouts with personal data at a printer, copy machine or fax machine for others to see.
- Don't post, share or tag content for personal gain in affiliation with Cadre or its affiliated brands, vendors or other business partnerships.
- Don't post, share or tag any confidential information or intellectual property or media (video/photo/audio) gathered or created on behalf of Cadre or our brands.
- Don't abuse access of Digital Asset Manager systems to obtain content for your personal platform usage.
- Don't post content created while on site, set, range or in an environment associated with photo shoots, video shoots or other settings if the content has:
 - Confidential information
 - Product call outs
 - Talent call outs
 - Other launch-related information
- Don't transfer personal data between countries without consulting the Legal & Compliance department.

🔑 CHECK POINT

I need to supply an outside party with some information about associates, some of whom live in other countries. How do I know what I can send?

Most countries have laws to protect associate data, and even providing names may be problematic. Refer the request to the Legal & Compliance department.



Build Ethical Relationships

To build an ethical company, we must also build ethical business relationships, based on trust, shared Core Values and a commitment to making a positive impact.

Working With Business Partners

We believe strong and resilient relationships with our suppliers and other business partners are critical for us to succeed in meeting customer expectations and continuously improve as a company. We are proud to work with a diverse range of suppliers who adhere to the same high standards to ensure delivery of quality products to our customers.

Agile, reliable and competitive – these are three main characteristics we look for in our suppliers. When selecting suppliers and other business partners, we evaluate them on an objective basis grounded in fairness. We also assess their ability to satisfy our business and technical needs and requirements.

If you interact with Cadre's customers, suppliers, competitors and associates, strive to protect their rights and be sure to deal with them fairly. Make sure any agreements we make with business partners are negotiated in good faith and fair and reasonable for both parties.



Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights. This includes an absolute opposition to human rights violations in any form.

MODERN SLAVERY AND CONFLICT MINERALS

We require our suppliers to conduct business the same way we do – ethically and legally. We do not tolerate any form of human trafficking or other unlawful or unethical labor practices. We are also committed to devising, implementing and enforcing controls to ensure Conflict Minerals are not sourced by our supply chain and used in our products. We must be vigilant in guarding against abuse and corruption of any sort and committed to ensuring that Modern Slavery and the use of Conflict Minerals do not occur in our supply chain.

WHAT DOES HUMAN TRAFFICKING LOOK LIKE?

It includes:

- Slavery
- Servitude
- Forced or compulsory labor
- Debt bondage

Watch for this activity. If you see it anywhere in our supply chain, report it.



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✓ WHAT TO DO

- Encourage our suppliers to adopt the same or similarly high standards of ethical behavior.
- Promptly report – the same way you would for an internal Company matter – any behavior by a supplier that doesn't match our ethical standards.
- Protect any proprietary information we possess that belongs to our suppliers.
- Watch for unsafe conditions or disregard of environmental standards in supplier facilities.

✗ WHAT NOT TO DO

- Don't engage in any potential conflicts of interest in supplier selection such as accepting improper gifts or directing business to a supplier owned or managed by a relative or close friend.
- Immediately report any form of human trafficking or use of forced labor in our supply chain, including employees who appear to be underage or subject to



Be a Good Government Partner

We are proud to serve a variety of customers, including local, regional and national governments and agencies. We are careful to be honest and responsible partners in every transaction.

Government Relations

As a leading global provider of personal protective equipment for law enforcement officers and members of the Armed Forces, Cadre conducts business both directly and indirectly with governments and officials in many levels. Dealing with governmental agencies and officials presents unique challenges, as each country or governmental subdivision has their own rules for business interactions.

One of the laws that applies to Cadre is the U.S. Foreign Corrupt Practices Act, which prohibits giving anything of value, directly or indirectly, to officials of foreign governments or political candidates to obtain or retain business. A number of other U.S. laws also impact gratuities offered to government officials. State, local and foreign governments may have similar rules. Promising, offering or delivering any such gratuity violates these laws and our policies.

Government Contracts

Any Cadre associate or third party who supports transactions with governments and government agencies and officials must operate with honesty, integrity and openness. You must also comply with applicable laws and regulations, which can be complex, and, if violated, can result in serious civil and criminal penalties.

Be aware that what's required of Cadre may also be required of any individuals or companies who work on our behalf. So anyone conducting government business for us must know and comply with contractual requirements and applicable laws and regulations.

HOW DO GOVERNMENT RULES IMPACT US?

They may affect the way we handle:

- Bidding
- Accounting
- Invoices and billing
- Subcontracting
- Employment practices
- Contract performance
- Gifts and entertainment
- Purchasing

Know how these rules may apply to your work.





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✓ WHAT TO DO

- Before you work with any governmental agency or official, know what specific laws and regulations apply to both the agency/ official and the type of transaction involved.
- Follow all applicable laws and regulations related to government procurement activities, particularly special requirements incorporated into bids or contracts.
- Adopt and follow processes that ensure reports, certifications and statements are current, accurate and complete.
- Make sure contract requirements are clearly understood and communicated to responsible parties in the Company.
- Protect classified information and government property in the same way you protect Cadre's information and assets.



✗ WHAT NOT TO DO

- Don't make any untruthful or inaccurate statements, communications or representations.
- Don't offer government officials gifts or meals of any amount without getting advance approval from management and knowing the laws, rules and regulations of that government agency regarding gifts or hospitality.
- Be careful not to make incorrect or unauthorized cost charges.
- Don't deviate from contract requirements, such as failing to perform tests, inspections, packaging or shipping as required.
- Don't make unauthorized contract substitutions.
- Don't violate government regulations regarding recruiting and hiring restrictions or certification procedures.
- Don't submit incomplete or inaccurate data or reports.



CHECK POINT

I'm working on a government bid, and I know we can't meet the required specifications, but my manager told me to say we can because our competitors probably couldn't meet them either. I told him I wasn't comfortable saying something that isn't true. What should I do?

Responses to bids are incorporated into contracts and often accompany representations. We may not knowingly make inaccurate or untruthful statements. This may lead to a claim of fraud. Escalate the matter to your manager's supervisor or the Legal & Compliance department or call the Ethics Helpline.

Compete Fairly

We are committed to competing in the marketplace fairly and honestly, never resorting to unfair or illegal business practices to gain an advantage.

At Cadre, we are committed to ensuring that everyone has a fair chance to compete. To that

end, we carefully comply with antitrust and competition laws, regulations and treaties, which seek to protect free enterprise by prohibiting practices like price-fixing, market-sharing, bid-rigging or behaviors aimed at establishing or maintaining a monopoly.

These laws can be complex and may vary across jurisdictions or countries. While the laws apply to every level of business, it is especially important that our sales and marketing professionals follow antitrust laws in making pricing or bidding decisions, dealing with customers and interacting with competitors.

WHAT ARE SOME EXAMPLES?

These and other arrangements could violate competition laws:

- Exclusive arrangements for selling products or services
- Bundling of goods or services
- Agreements that restrict a customer's ability to use or resell our products or services
- Technology licensing agreements restricting licensee or licensor freedoms
- Selective discounting
- Distribution arrangements with competitors
- Agreements to add a Company associate to another entity's board of directors

✓ WHAT TO DO

- Comply with all applicable competition laws and regulations.
- Review and understand our policies and procedures with respect to competition situations. If you have questions, reach out to our Legal & Compliance department.
- Make all pricing and bidding decisions independently from competitors.

✗ WHAT NOT TO DO

- Do not propose or enter into agreements or understandings – expressed or implied, formal or informal, written or oral – with any competitor regarding any aspect of competition between Cadre and a competitor.
- Avoid contact of any kind with competitors that could create the appearance of an improper agreement or understanding.
- Do not discuss competitively sensitive information with competitors.





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Competitive Information

Information about the competition is valuable to our Company. It helps us evaluate market or customer demand, develop products and services and maintain business success. When we gather such information, we do so legally and ethically. We must never steal trade secrets or inappropriately obtain competitive information.

Obtain information about competitors through legal and ethical means – never through fraud or deception or by improperly obtaining confidential information, including through disclosure by a competitor's former employee.



WHAT TO DO

- Use only publicly available information, including published articles, market analyses and purchased reports to obtain competitive intelligence.
- Observe all laws, rules and regulations that apply to contracting and procurement activities.



WHAT NOT TO DO

- Don't seek a competitor's confidential information or accept anyone else's confidential information without their consent.
- Don't use illegal or unethical means (e.g., theft, bribery, misrepresentations or espionage) to obtain competitive information.
- Don't knowingly make any untruthful or inaccurate statements or representations when bidding or negotiating a contract.



CHECK POINT

We have just hired a new associate who previously worked with one of our competitors. Is it acceptable to ask the associate to share confidential information from the competitor?

No. The new associate should not share confidential information about the competitor or violate any legal or contractual obligations that restrict disclosure of confidential information.



Communicate Responsibly

We're proud of our Company and our achievements, but the way we talk about them can help or harm us. To ensure consistent messaging, we communicate carefully and responsibly.

Communicating With the Public

We strive to communicate with the public and the media accurately and consistently. To ensure that we follow the law and speak with one voice, we allow only designated individuals authorized to speak on the Company's behalf to address all inquiries.

✓ WHAT TO DO

- Refer all contacts from mainstream media, journalists or other outside parties to the Marketing department.
- For any contacts from the government or law enforcement officials regarding sensitive matters, refer them to our Legal & Compliance department, or to the Marketing department for proper routing.
- If you receive a media contact that you're not sure how to handle, re-route the contact to the Marketing department for handling.
- All media releases and other external communications should be facilitated by the Marketing department and authorized by an executive and the Legal & Compliance department for approval and distribution.
- Respect trademark, copyright, fair use, trade secret and financial disclosure laws and Company guidelines in all communications.
- If you are a subject matter expert for your product, share publicly disclosed product information that informs and supports the promotion and sale of your product without releasing any confidential or sensitive information.

✗ WHAT NOT TO DO

- If a member of the media or other outside party approaches you for information, never provide confidential information.
- Don't issue any statement about the Company without approval from senior management to speak with the media.
- Don't use Company stationery or titles in your personal communications.
- Don't provide any sensitive or technical information about our products to the media or other outside parties that has not been cleared by the Legal & Compliance department.
- Don't say anything in a public forum that you wouldn't feel comfortable seeing in the headlines.





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Social Media

Social networking sites and other electronic communications are an important part of our lives and the way business is done today. In general, the rules that apply to new communication tools are consistent with traditional communication rules. We carefully consider how we refer to work and business activities whenever we use Company or personal computing devices and social media.



WHAT TO DO

- Use care and caution when managing your use of social media. Be truthful, accurate and respectful.
- Be transparent in your personal postings and reveal your relationship with Cadre.
- Be mindful of the Company's reputation, other people's right to privacy, the trust of our customers, suppliers and other business stakeholders and potential conflicts of interest.
- Use restraint and consider the risk to our customers, Cadre and our colleagues when posting any social media.
- Be aware that expressing personal views in a public forum can adversely impact our personal and professional reputation and that of our customers and suppliers.



WHAT NOT TO DO

- Don't discuss or post legal matters or make unauthorized disclosures, including proprietary or confidential information, trade secrets or corporate transactions.
- Don't use social media to provide associate or other reference requests.
- When stating your personal opinion, don't give the impression, intentionally or unintentionally, that you represent our Company or are expressing our Company's views.

- Don't post personal information about other associates, customers or vendors.
- Don't post photos, videos or other media without the consent of everyone featured and the Marketing Director.
- Don't use discriminatory, harassing,



CHECK POINT

A coworker posted an offensive, sexual comment about me on his personal social media page. Is my coworker allowed to do that?

No. Associate use of online media must comply with Company policies, including Company harassment policies.

Truth in Advertising

We have a responsibility to accurately represent Cadre and our products in our marketing, advertising and sales materials. That means we focus on honesty and clarity in all advertisements, corporate and product information and sales presentations we make. We are never misleading or unfair in our advertising and abide by all applicable advertising laws and guidelines.

Deliberately misleading messages, omitting important facts or making false claims about our products, individuals, competitors or their products, services or associates goes against our Core Values. Sometimes we must make comparisons between our products and our competitors, but when we do, we make factual and accurate statements that are verifiable and reliable.



Protect Our Company

When each of us commits to protecting Cadre, we don't just protect it for today. We honor the legacy we've built and contribute to a brighter future for our Company and everyone we serve.

Maintain Our Business Records

Our business records must be the source of truth for every decision our Company makes. Each of us helps to ensure that our records remain reliable and accurate at all times.

Financial Controls/ Accounting Practices

Each of us, regardless of our jobs or where we work, impacts our Company's financial statements every time we make entries into our books and records. With every entry, it's our responsibility to ensure accurate, complete and timely accounting and financial reporting of information.

HOW DO I IMPACT OUR FINANCIAL RECORDS?

Just a few examples include:

- Reporting hours worked
- Processing invoices
- Approving expense reports
- Signing contracts
- Making sales
- Having business meals with customers or co-workers
- Receiving raw materials





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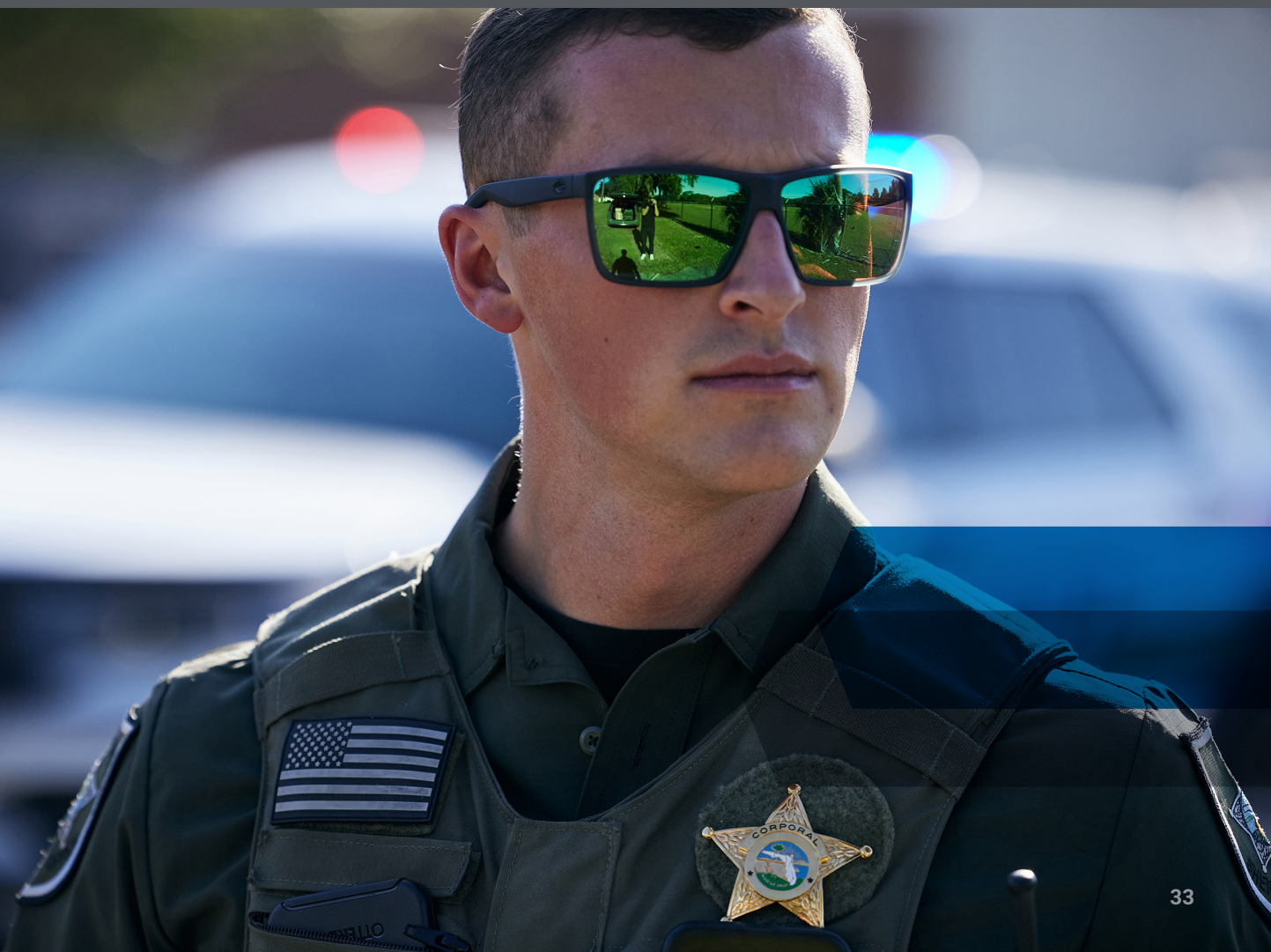
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✓ WHAT TO DO

- Carefully follow all applicable laws and regulations.
- Use our established financial and control systems to ensure honest, accurate, complete and timely recording and reporting of information.

✗ WHAT NOT TO DO

- Never engage in any activity that would circumvent our financial control systems.
- Do not intentionally take actions or make entries to our books and records that are false, distorted, misleading, misdirected, deliberately incomplete or suppressed.
- Never falsify any document.
- Never take any action (directly or indirectly) to coerce, manipulate, mislead or fraudulently influence our independent auditors to make our financial statements misleading. In general, it's prohibited to:
 - Not perform an audit, review or other required procedures
 - Withdraw an issued report
 - Fail to communicate matters to the Company's Audit Committee



Books and Records

To make sure we manage our business effectively, all Company books, records, accounts and financial statements must accurately reflect our transactions and comply with policies, procedures and legal requirements. When our books and records are reliable, they provide a fair and complete picture of our Company's financial performance and enhance our reputation.

Think of our records as our corporate memory, providing evidence of actions and decisions and containing critical information for our business. Records include all forms of information created, received, stored or collected by our Company, whether originals or copies, regardless of media. All records are the property of Cadre and should be retained according to our Records Retention Policy.

WHAT ARE SOME EXAMPLES?

Our records include any information about our Company or our business activities, such as:

- Paper documents
- Email
- Electronic files stored on disk, tape or any other medium (CD, DVD, USB data storage devices and more)

WHAT TO DO

- Carefully follow the law in keeping and presenting all Company records.
- Help Cadre maintain a system of strong and effective internal controls.
- Make sure every Company record accurately and fairly reflects the underlying transaction.
- Record every transaction in the proper

account, department and accounting period.

- Follow our Financial Delegation of Authority in all actions and commitments.
- Each of us must properly label and carefully handle confidential, sensitive and proprietary information and secure it when not in use.
- Follow the Company's records retention policy to ensure proper retention and destruction.
- Report any concerns about the accuracy of

MAKE SURE EVERY ENTRY IN OUR BOOKS AND RECORDS IS ...

- Complete
- Accurate
- Aligned with our policies, procedures and the law

our records to finance management or the Ethics Helpline.

WHAT NOT TO DO

- Never make false or misleading entries in Company documents. Avoid exaggerations, derogatory remarks, guesswork or characterizations that could be misunderstood.
- Never attempt to interfere with or improperly influence an audit, investigation or review.
- Never destroy records before the retention time expires or when required for litigation or investigation without approval from the Legal & Compliance department. However, do destroy documents when they no longer have a business purpose. Refer to our Records Retention Schedule to learn more.
- Never maintain unrecorded or "off the



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Expense Reporting and Reimbursement

When we travel for business, our Company trusts us to spend its money as carefully as we would our own. That includes making sure our travel and entertainment activities align with our business needs and our policies and procedures. It also means ensuring that as associates, we never lose or gain financially as a result of business travel, entertainment or expenses.

✓ WHAT TO DO

- Make sure your business expenditures are proper, reasonable and comply with our policies for travel and business expenses.
- Report and receive reimbursement for all approved business expenses. Ask your supervisor or the accounting office for guidance if you're unsure if a certain expense is legitimate.
- Promptly submit all expense reports and include receipts and explanations to properly support your expenses.

✗ WHAT NOT TO DO

- Never falsify any document or receipt.
- Never report or attempt to receive reimbursement for non-reimbursable expenses.



Disclosures

Cadre is committed to ensuring all public disclosures and communications we make, including disclosures to the SEC, are full, fair, accurate, timely and understandable. Anyone who contributes to these disclosures must carefully comply with applicable disclosure standards, including standards of materiality, when required. Contact the Legal & Compliance department to learn more.

✓ WHAT TO DO

- Properly review and analyze disclosures to ensure accuracy and completeness.
- If your work involves financial reporting and disclosures, make sure you understand our financial operation and the disclosure requirements that apply.
- Notify the Chairperson of the Board if you have concerns about:
 - Deficiencies in our disclosure controls that could harm our ability to record, process or report financial data
 - Potential fraud involving any associate who plays a role in the Company's financial reporting, disclosures or disclosure controls

✗ WHAT NOT TO DO

- Never knowingly misrepresent facts about the Company to anyone inside or outside the Company, including our independent registered public accountants, governmental regulators, self-regulating organizations and other government officials.

Prevent Money Laundering

We believe in upholding integrity, both in our Company and our financial systems. That includes keeping illegal activity like money laundering out of our business.

Money laundering happens when criminals disguise the source of their funds by running them through a legitimate business like ours. Using complex transactions, criminals may hide activity such as terrorism, the illegal narcotics trade, bribery and fraud.

If our Company is associated with activities like these, it undermines our integrity, damages our reputation and can lead to severe sanctions for Cadre and anyone else involved. That's why we are committed to complying with anti-money laundering laws and never knowingly engaging in transactions that facilitate this activity.

WHAT TO DO

WHAT SHOULD I WATCH FOR?

Signs of suspicious transactions, such as:

- Requests for cash payment, travelers checks or checks from unknown third parties
- Complex payment patterns
- Transfers involving countries not related to the transaction
- Avoidance of recordkeeping requirements
- Involvement of locations known for money laundering or tax evasion
- Transactions that differ from a client's normal pattern





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- Get to know the anti-money laundering laws of the United States and other countries, which require transparency of payments and the identity of all parties involved.
- Know your customers. When you do, you help Cadre conduct legitimate business activities with reputable customers.
- Be alert for and report signs of suspicious transactions to the Legal & Compliance department.



CHECK POINT

A client has requested that we invoice a third party in a different country for payment. That country has a free trade zone and is known for product diversion. The customer also wants to pay several invoices in cash. Should I change the invoicing and accept these payments?

No. This activity looks suspicious, and money laundering may be involved. In general, cash is not an acceptable form of payment, and payments should not be made to third parties. Notify the Finance and Legal & Compliance departments about this request. You should know your customer, its reputation and business practices and never do business in this manner. Stop doing business with them until a thorough background check is conducted.

A customer has asked to pay their company from multiple accounts, using a combination of multiple payment types (cash, check, etc.). What should I do?

This may be suspicious money laundering behavior. Consult our Legal & Compliance department immediately and don't proceed with the transaction or accept payment from the counterparty until you have received proper guidance.

Avoid Conflicts of Interest

As Company associates, we must all act in our Company's best interests and avoid anything that could compromise our judgment – situations known as conflicts of interest.

Recognizing Potential Conflicts

As associates, we must make sure our personal activities and interests never conflict with our responsibilities to the Company. Sometimes even just the perception of a conflict of interest can raise concerns. It's important to understand that even if you don't intend to do anything wrong, just the appearance of a conflict can have negative effects.

Carefully consider your actions and decisions to make sure you're not damaging (or appearing to damage) our Company's reputation. We also expect you to disclose potential conflicts of interest.

WHAT ARE CONFLICTS OF INTEREST?

They are situations (whether real or perceived) in which competing interests may impair your ability to make objective and unbiased decisions for Cadre Holdings.

✓ WHAT TO DO

- Disclose any situation to your manager or supervisor that may cause a potential or actual conflict of interest.
- Use good judgment in all your business and personal dealings with others.
- Obtain approval before accepting any officer or director position with an outside organization, including charitable, for-profit or governmental, while you are an associate of the Company.
- If you have any questions about what constitutes a conflict of interest, contact your manager or supervisor, a Human Resources representative or the [Ethics Helpline](#) for guidance.

✗ WHAT NOT TO DO

- Avoid even the perception of a conflict of interest.
- Don't use your position or influence with the Company to promote or assist in an outside activity.
- Don't hire, promote or directly supervise a family member or close friend.





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Outside Employment

From time to time, you may wish to engage in work outside our Company. If you do, your outside employment must never create a conflict of interest. Never use Cadre's tangible or intangible property, including documents, information technology assets, facilities and intellectual property to conduct non-Company business.



WHAT TO DO

- Always notify your manager or supervisor if you hold an outside job. Seek appropriate approval from your manager and Human Resources for any outside job.
- Make sure you can continue to meet the performance standards for your job.



WHAT NOT TO DO

- Avoid accepting work for a vendor or a supplier. Remember, we prohibit outside employment that constitutes a conflict of interest.
- Don't accept work from a competitor.
- Don't gain ownership or part ownership of another business that sells goods or services to Cadre.
- Don't use Company tangible or intangible property (e.g., documents, information technology assets, facilities and intellectual property) to conduct non-Company business.



Follow Gift and Hospitality Rules

We strive to build goodwill in our business partnerships, but we never allow improper offers to become a part of these relationships or influence our judgment.

Recognizing Improper Offers

Gifts and hospitality can serve legitimate business purposes, but they can also create real or perceived conflicts of interest or give the appearance of a bribe. There may also be significant legal restrictions regarding gifts and hospitality when dealing with government officials, so be sure you know and follow any restrictions, applicable laws and Company policies before offering or receiving any gift or hospitality.

WHAT TO DO **APPROPRIATE GIFTS AND** **HOSPITALITY ARE:**

- Nominal in value
- Directly related to Company business, like reasonable meals and entertainment
- Permitted under our policies and local law and practices

THEY ARE NOT:

- Lavish
- Extravagant or extraordinary
- Offered to gain an improper advantage
- Offered to government officials without prior approval





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- Before offering or giving gifts, entertainment or reimbursement of customer travel expenses, first consult the Legal & Compliance department and obtain prior approval.
- Always follow applicable legal requirements and Cadre's policies and guidelines to ensure gifts and hospitality are appropriate.
- Clearly and completely document all expenses and transactions in our Company records. See [Prevent Bribery and Corruption](#) to learn more.

WHAT NOT TO DO

- Never offer or accept a business courtesy, such as a gift, contribution or entertainment if it creates the appearance of something inappropriate.
- Never offer, promise, pay or authorize anything of value (such as money, goods or services) to a government official or customer to obtain or retain an improper advantage.
- Never give gratuities or other payments to government officials or employees to expedite routine administrative actions without fully disclosing it to our Legal & Compliance department in advance.



Safeguard Intellectual Property and Confidential Information

Information is critical to Cadre’s business. It helps us innovate, fulfill our obligations and build trust. We recognize our duty to handle this information with care.

Identifying and Protecting Proprietary Information

Our Company’s intellectual property and confidential information (collectively, “Proprietary Information”) are among our most valuable assets. We must protect this information from theft, misuse, loss and unauthorized use. We must also protect the confidentiality rights of others. If Proprietary Information is used improperly or disclosed, it could lead to financial costs, loss of business advantage and liability for our Company under confidentiality agreements with third parties, civil damages and criminal penalties.

WHAT SHOULD I PROTECT?	
<div>Intellectual property, which includes:</div> <ul style="list-style-type: none">• Patents• Unpublished patent applications• Trade secrets• Proposed and registered trademarks, copyrights• Other intangible assets, such as ideas, inventions, know-how, processes and designs created on Company time, or on our behalf, at our expense, using our resources or within the scope of your job.	<div>Proprietary Information, which includes:</div> <ul style="list-style-type: none">• Business, marketing or service plans• Engineering and manufacturing ideas• Financial information• New product launch plans• Databases• Customer lists• Supplier or vendor information• Pricing information• Operating systems and other systems• Manuals and records• Internal controls• Staffing information• Employee lists and personnel information• Legal data• Any other corporate proprietary information belonging to Cadre
<div>Note that this list is not exhaustive. Proprietary Information also includes other information that is marked as confidential or proprietary or would reasonably appear to be confidential or proprietary in the context of how it's known or being used.</div>	



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✓ WHAT TO DO

- Use care and follow Company guidelines to treat all Company Proprietary Information as confidential to protect these assets from losing value due to misuse or abuse.
- Respect patent, trademark, copyright, fair use and trade secret laws as well as Company guidelines in all our communications.
- Take timely and reasonable steps to secure intellectual property protection for inventions, other proprietary information, trademarks, trade secrets and copyrighted materials.
- Work diligently to safeguard the Company's Proprietary Information by properly using and marking Company products and collateral with accurate patent, trademark and copyright markings.
- Respect the valid intellectual property rights of others by avoiding unlawful use and disclosure.
- Use proper trademark and patent markings owned by Company suppliers or other third parties by following each party's usage guidelines.



✗ WHAT NOT TO DO

- Never directly or indirectly disclose, publish, communicate or make Proprietary Information available to any person or entity outside of Cadre, except as required to perform your job duties and only after obtaining a confidentiality agreement ("Mutual Non-Disclosure Agreement") from the Legal & Compliance department and after the Company executes that agreement with the party with whom we are sharing the Proprietary Information.
- Never knowingly violate a third party's intellectual property rights.
- Never use or accept Proprietary Information belonging to a third party without obtaining initial approval from our Legal & Compliance department.
- Never disclose any new idea or invention to others without first consulting with the Legal & Compliance department to properly safeguard the information.
- Never disclose or use the Proprietary Information of former employers.



CHECK POINT

I work in Product Development, and we are eager to show potential customers a new product that has not been released to the public. Is it OK to show the new product?

No, unless there is a non-disclosure agreement with the customer. Be aware of situations where we show products that have not yet been released to the public. Consult the Legal & Compliance department before disclosing any new product information.

Protect Company Resources

Each of us is entrusted with valuable resources to do our jobs and operate our business. We use these assets properly and protect them from theft, damage, loss or misuse.

Use of Company Equipment and Assets

Proper protection and use of Company property is a fundamental responsibility of every associate.

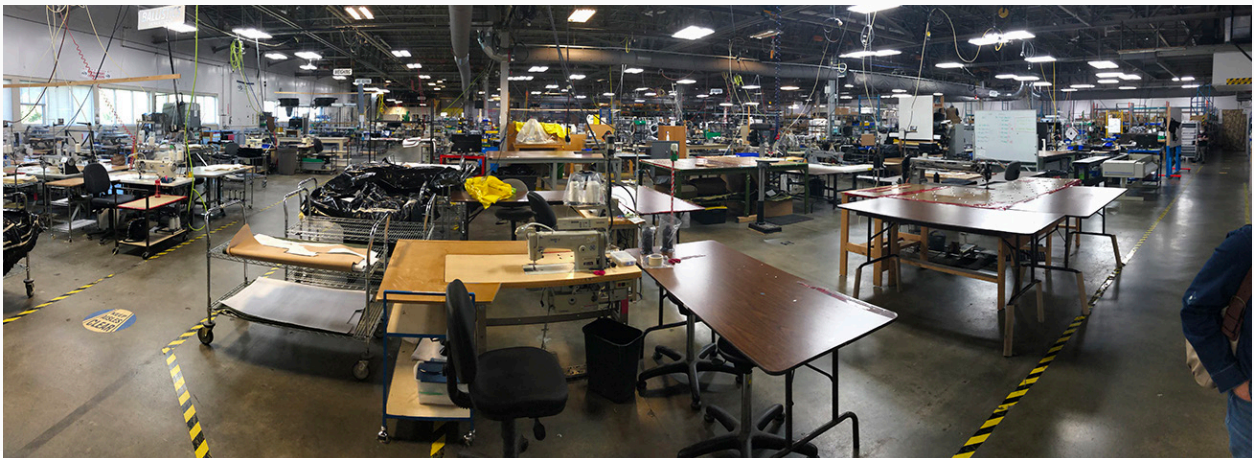
COMPANY PROPERTY INCLUDES ...		
Physical Assets	Information Assets	Equipment and Electronic Assets
The resources we can see and touch, such as: <ul style="list-style-type: none">• Facilities and furniture• Vehicles• Business equipment• Merchandise• Supplies	The information we create or collect, such as: <ul style="list-style-type: none">• Confidential information• Data• Records• Intellectual property• Trade secrets• Patents, trademarks and copyrights	The resources that keep our systems running, such as: <ul style="list-style-type: none">• Computers and networks• Phone systems• Laptops• Software• Communication networks• Cell phones

While limited personal use of certain resources is sometimes permitted, never take this privilege for granted or assume that you have a right to privacy when using these resources.

Cybersecurity

It's also your responsibility to use Company information technology (IT) appropriately and responsibly, and follow our security, communications and IT policies. You can help protect our systems from malware and other threats by adopting good cybersecurity habits:

- Updating your passwords and never sharing them
- Never opening suspicious links
- Never accessing Company information through an unsecured network like a public WiFi
- Storing Company devices in secure locations to prevent unauthorized use or theft





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✓ WHAT TO DO

- Use IT equipment and phones for business purposes and with good judgment. While limited personal use is permitted, make sure it doesn't conflict or interfere with normal business activities, incur costs or violate the law.
- Be careful when posting information to the internet. Remember, it can instantly become global in nature, permanently available and could be republished in other media.
- Exercise good judgment and integrity and follow all security measures and internal controls when using Company equipment and technologies.
- Safeguard important Company data stored on our computer systems and networks.
- Report any incidents of theft, fraud or misuse of Company equipment to your supervisor.
- Help Cadre use artificial intelligence "AI" responsibly by following our policies and never allowing confidential information to be input into AI tools. Verify the output of AI tools to ensure that responses are factual and don't violate our standards or our legal, regulatory or contractual requirements.

✗ WHAT NOT TO DO

- Never violate Company security policies when using Company equipment.
- Except where there is appropriate licensed software, don't install unauthorized software on a Company computer or copy software.
- Never use Company equipment to conduct outside work or for any unauthorized purpose.
- Do not install Company software on personal or home computers or install personal software on Company computers without proper authorization.
- Do not share Company equipment with others outside of Cadre without proper authorization.
- Do not use Company equipment to access or download inappropriate, sexually explicit or illegal information.
- Never use Company systems (such as email, instant messaging, the intranet or internet) to engage in activities that are illegal, violate Company policies or lead to liability for Cadre.



Do What's Right

The way we work is as important as the work we do. That's why we conduct business – everywhere we conduct business – with integrity, and make informed decisions with our principles, policies and guidelines in mind.

Prevent Bribery and Corruption

We are committed to complying with anti-bribery and corruption laws everywhere we operate and doing business ethically, without the influence of improper offers.

Bribes, Kickbacks and Facilitating Payments

To make sure we are aligned with anti-bribery and anti-corruption laws around the world, we don't offer, give or accept anything of value (such as money, goods or services), directly or indirectly, to win business, keep business or gain a business advantage. Because we can be held responsible for the actions of our third parties, such as distributors and representatives when they conduct business on our behalf, we make sure they know and follow our policy.

Our zero-tolerance policy also applies to payments made to government officials for facilitating some type of business transaction or activity. These are referred to as "facilitating" or "grease" payments, which we prohibit.



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WHAT LAWS ADDRESS BRIBERY AND CORRUPTION?

Three well-known anti-bribery laws we follow are:

- The U.S. Foreign Corrupt Practices Act
- The Canadian Corruption of Foreign Public Officials Act
- The UK Bribery Act of 2010

Countries around the world have similar laws because acts of corruption can have severe consequences for both associates and companies. They can also significantly impact global markets and societal well-being.

Regardless of your job and location, it's important for you to recognize a bribe when you see one and avoid even the appearance of something improper.



WHAT NOT TO DO

- Don't engage with agents who do not wish to have all terms of their engagement with Cadre clearly documented in writing.
- Never offer or accept a business courtesy, such as a gift, contribution or entertainment if it creates the appearance of something improper.
- Never offer to pay a gratuity or other payment to a government official or employee for routine government actions without first disclosing it to the Legal & Compliance department.



CHECK POINT

One of our new international distributors has asked to purchase some of our equipment with his own money to give to his government contact in advance of a contract award. Should we sell him the equipment?

No. Do not sell the equipment to him. Advise the distributor that giving free equipment could be perceived as a bribe because he is giving something of value to a government official in order to obtain a contract.



WHAT TO DO

- Understand how anti-bribery laws apply to your role at Cadre and contact the Legal & Compliance department if you have questions (whether you are offering or being offered something of value).
- Obtain approval in advance from the Legal & Compliance department before you offer or give gifts or entertainment or reimbursement of a customer's travel expenses.
- Carefully monitor third parties acting on our behalf, particularly when dealing in countries with high corruption rates and in situations where "red flags" indicate further screening is needed.
- Conduct all transactions openly and transparently. Make sure customer invoices accurately reflect what was sold. Provide appropriate supporting documentation when required.
- Immediately report any concerns of suspected bribery, whether it happens in our operations or with a third party.

Protect Inside Information

We don't use inside information to buy or sell securities, or "tip" others to buy or sell, because doing so is not only unethical, but also illegal.

Recognizing Inside Information

As associates of Cadre, we are prohibited from trading or enabling others to trade stock of our Company or any other public company (such as a customer, supplier, competitor, potential acquisition or alliance) when we possess inside information.

WHAT IS INSIDE INFORMATION?

It is any information about Cadre Holdings, or about companies we conduct business with, that is:

- Nonpublic, meaning it has not been adequately disclosed to the public
- Material, meaning it is information that an investor might consider important in deciding to buy, sell or hold a Company's securities (for example, information about a Company's anticipated earnings, plans to acquire or sell significant business or changes in senior executives)

Most of us don't have access to inside information, but if you do, you must exercise the utmost care when handling it, because insider trading is a serious crime. Violations of the law can subject both individuals and our Company to severe civil and criminal

WHAT TO DO

- When trading in our Company's stock, or the securities of other companies (in both U.S. and other securities markets), follow the rules. Comply with all insider trading and securities laws and Company policies that relate to these transactions and the handling of confidential information.
- Consider all nonpublic information about our Company to be confidential information – use it only to conduct Company business, never for:
 - Personal financial benefit or to "tip" others who might make an investment decision based on the information
 - Stock trading or any other purpose
- Limit trading transactions to times when material information about a Company has been disclosed. Allow two business days from the time material information is made public by news services to the time you place your order, so the financial markets can absorb the information.
- Whenever you buy or sell Company securities, tell the broker about your relationship with the Company to help them determine whether you have "insider" status under securities laws.
- Be aware that these rules apply to members of your family and anyone else who shares your home. That's why you must use discretion when discussing your work with friends, family members and other associates.



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⊗ WHAT NOT TO DO

- Never trade Company securities while you possess inside information about our operations, activities, plans or financial results. Exceptions may apply to certain associates based on a prearranged contract, but these must be approved by the Board of Directors or their designee and the Legal & Compliance department.
- Unless permitted by the Securities and Exchange Commission rules, don't trade securities of other companies when you possess inside information about them or when a trade is unlawful or creates a conflict of interest.
- Remember, inside information about our Company belongs to our Company, so do not use it wrongfully or dishonestly for anyone's benefit. To help protect it, don't disclose it to:
 - Anyone inside the Company unless they need to know the information for business purposes
 - Anyone outside the Company unless you obtain approval in advance from senior management or the Legal & Compliance department
- Do not buy or sell put or call options on our Company's stock, and do not sell Company stock short. Contracts which may have short-selling features (e.g., forward sales contracts) may only be entered into with the approval of the Board of Directors or their designee.



DID YOU KNOW?

Giving a tip based on inside information is prohibited, even if you don't profit from it.

🔑 CHECK POINT

I know Cadre is engaging in confidential negotiations to acquire another company. Can I trade shares in our Company?

No. Knowledge of these negotiations is inside information. Using that information to purchase shares in our Company's stock would violate our policies and could subject you to insider trading violations.



Conduct Global Business Responsibly

Compliance with international trade compliance laws and regulations not only helps safeguard national security, but also our reputation as a responsible global company.

Imports and Exports

We are a company that transacts business around the world, exporting products, services, technology and technical data, and importing articles and materials. That's why it's so important that we understand and follow all the laws and regulations associated with that privilege.

Export and import laws apply to many aspects of our business – not only to the shipment of tangible articles, but also to the transfer of technical data and technology, including transfers between affiliate companies. To help you know what's required, we maintain robust export policies and procedures, along with function-specific training.

IMMEX (Maquila)

Maquila operations involve the shipment of foreign merchandise into our facility in Tijuana, Mexico, on a temporary basis for assembly, manufacture or repair and return to the United States. We comply with all laws associated with this operation.

HOW DO WE COMPLY?

Import laws and regulations apply to our intra-company import transactions in every country in which we operate.

To comply, we are careful to:

- Accurately determine the proper tariff classification, valuation, country of origin and other required information.
- Report complete, accurate and detailed information about imported articles to various regulatory agencies.

Anti-Boycott

Many countries have laws that require companies to either refuse or not refuse to do business with another country, its companies or its citizens. In the United States, the law prohibits companies like ours and our subsidiaries from cooperating with international boycotts not sanctioned by the U.S. government, such as the Arab League's boycott of Israel.

The Company is committed to complying with the law and to reporting boycott requests to the appropriate government agency. As an associate, you must direct any requests to participate in a boycott, or to communicate our Company's position, to the Legal & Compliance department.

WHAT TO DO

- Be aware of, and comply with, applicable international trade controls, laws and regulations.
- Before working on a program involving sharing commodities or technologies with foreign parties, consult Company policies and procedures and the Import & Export Compliance department.
- Contact and obtain authorization from the Import & Export Compliance department when:
 - Providing a service or releasing controlled commodities to anyone outside the country where you are located
 - Sending/carrying controlled commodities



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or technology out of the country where you are located

- Contact the Import & Export Compliance department about any products that are sourced from a foreign supplier to ensure that we give the correct information to customs at the time of entry.
- Screen transactions against the rules that restrict trade with certain sanctioned countries, persons or entities.
- Screen business partners, suppliers and parties involved in international transactions against government watch lists.
- Know, watch for and report to the Import & Export Compliance department any “red flags” that indicate a customer may be trying to evade compliance with the law.
- Be aware that requests to participate in unsanctioned boycotts can take many forms (such as bids, terms and conditions, instructions, letters of credit, purchase orders, shipping documents, etc.).
- Always exercise reasonable care and due diligence when making North American Free Trade Agreement (NAFTA) claims on exported and imported qualifying products – maintain NAFTA certificates of origin and related claim documentation as required by law.

WHAT NOT TO DO

- Don't assume our vendors are complying with import and export controls – if you see or suspect non-compliance, raise your concerns.
- Don't engage in any export or import without consulting the Import & Export Compliance department to determine how and with whom you may share technology or technology data with.
- Don't ship controlled commodities, technologies or software to anyone unless:

- You are certain the recipient has been properly vetted and screened.

-You have the required export permits.

- Don't assume that an import tariff classification provided by our foreign supplier is accurate – our Company, as the importer of record, must assign the correct tariff number.
- Don't assign an import tariff classification without consulting the Import Compliance department.
- Don't engage in transactions involving embargoed countries, a citizen of an embargoed country or an individual or entity subject to government sanction.
- Don't agree to, or provide information for, requests to participate in boycott activities



CHECK POINT

I need to send some technical drawings from Canada to other associates in the UK and Mexico. I assume since we all work for the same company, there is no problem, right?

No. If the drawings are controlled technical data, they would be considered an export and sending them out of the country could violate export control laws. Contact the Export Compliance department for guidance before sending any controlled products or technical data.

Follow Firearm Sale and Transfer Laws

Our work is all about protecting people and saving lives. To fulfill our Mission, it's critical that we follow the rules governing the sale and transfer of firearms.

Understanding the Law

Some of our Company's operations involve the sale or transfer of firearms or destructive devices, and we are committed to following all laws and regulations relating to these operations. That includes:

- All applicable U.S. federal, state and local laws and regulations related to operations under a Federal Firearms License ("FFL")
- The sale or transfer of Firearms to "Authorized Purchasers," as required under Company policies

When it comes to selling or transferring firearms or destructive devices to individuals or organizations, the purchaser or transferee is permitted under applicable laws and regulations and must certify compliance as an Authorized Purchaser, as required under Company policies.



✓ WHAT TO DO

- Understand and follow applicable laws and regulations, as well as Company policies and procedures relating to the sale or transfer of firearms or destructive devices.
- Be familiar with the general transaction "red flags," indicating that a customer may be attempting to evade compliance with laws and regulations relating to the sale or transfer of firearms or destructive devices.
- Make a sale or transfer of firearms or destructive devices only to "Authorized Purchasers" as defined in our policies.
- Maintain a record of sales or transfers of firearms or destructive devices.

✗ WHAT NOT TO DO

- Don't sell or transfer a firearm or destructive device to any prohibited person as prohibited by applicable laws and regulations.
- Don't sell or transfer a firearm or destructive device unless required background checks or "red flags" are cleared.
- Don't engage in any fraudulent sale or transfer of firearms or destructive devices.



Ensure Product Safety

Providing safe, high-quality products isn't just a goal – it's an absolute requirement for our Company. We fulfill it by upholding our high standards without fail.

Lifecycle Management

Our Company's performance depends on us successfully managing projects covering product development, delivery of services and program management. Lifecycle Management (LCM) is the key process that defines how we manage these projects.

LCM processes use measures that ensure the quality, safety and environmental sustainability and compliance of products throughout their entire lifecycle, from initial concept through retirement. It drives us to deliver projects that meet business needs and ensure that we're following applicable safety, environmental and regulatory requirements. LCM promotes the application of best practices and continuous improvement across the Company to provide a sustainable competitive advantage.

WHAT'S OUR OBJECTIVE?

Our mutual objective is to achieve 100% conforming products, in line with our Zero Defects campaign.

It's a philosophy of ensuring quality and safety by embracing the idea that mistakes are unacceptable.

✓ WHAT TO DO

- Ensure you understand and are in conformance with our LCM and Product Safety and Environmental policies and procedures.
- Notify your manager or supervisor immediately if you discover any potential non-conformances to established LCM and Product Safety and Environmental policies and procedures.
- Embrace the Zero Defects campaign.
- Assess and understand the safety risks associated with a product and work to mitigate this risk, both in the factory and in the field.

✗ WHAT NOT TO DO

- Don't assume that responsibility for Product Safety and adherence to the LCM process is someone else's job – we are all responsible.
- Don't attempt to design a new product or revise an existing product if you're not qualified or delegated to do so.



Participate Ethically in the Political Process

We are committed to ensuring a fair political process, where each of us participates freely, and improper influence isn't allowed to influence elections.

Lobbying

At Cadre, we understand that lobbying can be an effective way to advocate for our interests in the legislative process, but it also carries risks for our Company. Lobbying activities are heavily regulated and failing to comply with laws can lead to significant penalties.

When it comes to lobbying or political support, the Company limits those efforts to policy issues and debates that are of legitimate concern to our business objectives. If we do engage in lobbying, our efforts must be conducted openly and honestly, and in compliance with applicable laws.

WHAT IS LOBBYING?

The definition can vary widely. While lobbying involves attempting to influence legislative decisions by a government, it may include almost any interaction with government officials for a business purpose.

Political Support

We believe participation in the political process should be lawful and ethical. That is why the Company won't make political payments, participate directly or indirectly in political activities or make corporate contributions or donations to political parties or their representatives.

The limits we place on the Company's political activities are not meant to restrict our associates' rights to participate as individuals. As a citizen you can make personal contributions to a political party, committee or candidate as long as the donation doesn't directly or indirectly involve Company funds or other resources. Use your own time and resources (not the Company's) to support your political activities, and never pressure your coworkers in any way to contribute money or effort to support a political party or candidate.





Support Our Communities

We believe in being active members of our communities, doing our part through financial and hands-on support to make a positive impact.

Charitable Activities

As a Company whose Mission is "Together, We Save Lives," we support, sponsor and contribute to other organizations with similar missions. Through charitable contributions or sponsorships to organizations that share our Core Values and business objectives, we help to accomplish our own Mission and enhance our Company's reputation. While there may be many worthy organizations, we must ensure that any use of Company funds for charitable giving and sponsorships is coordinated and authorized by management.



✓ WHAT TO DO



- Look for charities and good causes that focus on improving the health, welfare or lives of our core customers: members of law enforcement, the military, private security and their respective families.
- Before making any commitments on our Company's behalf, refer all requests for sponsorship and charitable donations to the Legal & Compliance department to make sure they meet our sponsorship and charitable giving criteria.

✗ WHAT NOT TO DO

- Don't support your personal community activities on Company time or with Company resources.
- Don't represent Cadre in any public process or forum unless management has specifically asked you to.
- Don't dedicate Company funds or resources to third parties that are raising money for charitable organizations. Our strategy is to give funds directly to charitable organizations, for example, in the United States, charities designated as 501(c)3 organizations. If you want to support the third parties' efforts on behalf of a charity you believe in, offer your support personally and privately.

Find Help

If you ever have questions or need guidance, reach out to one of these resources:

ISSUES OR CONCERNS	CONTACT
To ask questions or report potential misconduct or other ethical concerns	<p>Access the Ethics Helpline</p> <p> By phone: From an outside line, dial the One Connect number for your location:</p> <p>Belgium 0800 27 152 US and Canada 1-866-830-5772 UK 0808 281 5661 France 0800 90 91 70 Germany 0800 081 4363 Lithuania 0800 80023 Mexico 800-872-1960 Italy 800-826-977</p> <p> Or online: cadreholdings.ethicspoint.com</p>
For human resources and benefits questions	Your local Human Resources department
For legal questions	Legal & Compliance department
For finance questions	Finance department Or Audit Committee
For technology questions	IT
For media or messaging questions	Communications department
For global trade questions	Import & Export Compliance department

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Make Your Commitment

I acknowledge and confirm that I have received a copy of Cadre's Code of Conduct. I have read this document and agree that while in the employment of Cadre, I will conduct myself in accordance with this Code, our policies and our Core Values.

Name: _____

Date: _____

Associate ID Number: _____