



Supplier

Code of Conduct

Introduction

At Cherokee Federal, we are committed to **five core values — purpose, respect, integrity, discipline and excellence.** They are the foundation of our business. Our core values exemplify how we conduct all aspects of our business while complying with applicable laws, regulations and standards of business conduct. Our customers expect nothing less. We firmly believe and expect our suppliers to meet these expectations. In turn, we trust that all of our suppliers and partners will honor these same values.

Our Supplier Code of Conduct sets the expectations for our suppliers (which includes vendors, subcontractors, consultants or other third parties), and aligns with the standards we set for our employees, the Cherokee Nation Businesses Board of Directors and other business associates. Thank you for your shared commitment to meeting these core values. If you'd like to receive a copy of our ethics policy, please email complianceandethics@cherokee-federal.com.



Laws, Regulation & Contracts

Suppliers must perform all duties and expectations in compliance with all laws and regulations applicable to their business. Our suppliers must comply with all terms, conditions and other provisions specified in Cherokee Federal purchase orders or subcontracts. When performing international business or work outside of the United States, suppliers must comply with local laws and regulations in those countries.

Financial Responsibility/Accurate Records

We expect suppliers to maintain accurate records, reports and business documentation. These records include but are not limited to, financial accounts, quality reports, time records, expense reports, resumes and submissions to Cherokee Federal or its subsidiaries, the customer or regulatory authorities.

Fair Competition/Anti-trust

Our suppliers must conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations. This includes avoiding business practices such as entry into arrangements that unlawfully restrain competition; improper exchange of competitive information; price-fixing, bid rigging or improper market allocation.

Anti-corruption

We have a zero-tolerance for corruption. Cherokee Federal prohibits anyone conducting business on our behalf from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office or other persons. This includes the offer and/or receipt of any bribe or kickback to and/or from any customer, supplier or others. Our suppliers must comply with the anti-corruption laws that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.



Gifts/Business Courtesies

We compete on the merits of our products and services. We do not use the exchange of business courtesies to gain an unfair competitive advantage. We expect the same of our suppliers in the offering or receipt of any gift or business courtesy, including cash and cash equivalents. Our suppliers must ensure that the offering or receipt of any gift or business courtesy is allowed by law and regulation, and does not violate the rules or standards of the recipient's organization. Accepting the gift or courtesy must not adversely affect the reputation of Cherokee Federal.

Conflicts of Interest

Our suppliers must avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Cherokee Federal. We expect our suppliers to report to Cherokee Federal, any situations of potential or apparent conflicts between their personal interests and the interests of Cherokee Federal.

Export/Import Control

We expect our suppliers to ensure that their business practices are in accordance with governing export and import laws and regulations of domestic and foreign origin parts and components and related technical data.

Counterfeit Parts

We expect our suppliers to have effective processes in place to detect counterfeit parts and materials, and mark parts obsolete as appropriate. This includes developing, implementing and maintaining methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products.

Proprietary Information/Government Classified

Our suppliers must take proper care to protect all sensitive information, including proprietary, personal and government classified information. Prior authorization is required for information collected or received on our behalf to be used outside of its intended business purpose.



Non-discrimination

We expect our suppliers to provide equal employment opportunities to employees and applicants. This includes employing individuals regardless of race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability.

Harassment

Our suppliers must provide a work environment free from physical, psychological and verbal harassment, or other abusive conduct.

Drug-free Workplace

We expect our suppliers to maintain a workforce free from illegal drugs.

Human Rights

We expect our suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all and help create an inclusive and ethical culture.

Human Trafficking

Our suppliers are expected not to engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation.

Child Labor

We expect our suppliers not to engage in the practice of child labor to perform work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

Employee Safety & Health

We expect our suppliers to comply with applicable safety and health laws, regulations, policies and procedures. Suppliers should provide for the health, safety and welfare of their people, visitors and others affected by their activities while on-site.

Environment

Our suppliers must operate in a manner that actively manages risk, conserves natural resources and protects the environment.

We expect our suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss and opportunities for business growth through operational and product stewardship.

Conflict Minerals

We expect our suppliers to adhere to federal laws and regulations regarding conflict minerals (gold, tantalum, tin, and tungsten). Our suppliers whose products contain these minerals are expected to conduct due diligence on the source and chain of custody to support the eradication of the use of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries. Our suppliers that are US stock exchange listed companies manufacturing or contracting to manufacture products containing conflict minerals must make specialized disclosures and file reports as required by the US Securities and Exchange Commission.

Reporting

Employees of our suppliers should have access to multiple avenues to raise issues or concerns without fear of retaliation.

Supplier Diversity

Our suppliers should be aware that we often have customer-directed supplier inclusion goals that may require the use of in-country providers. This may include the use of small businesses, small disadvantaged businesses, woman-owned small businesses, HUBZone certified businesses, veteran-owned businesses, service-disabled veteran-owned small businesses, small/medium size businesses or aboriginal businesses.

Codes of Conduct & Sub-tier Suppliers

We expect our suppliers to have management systems in place to support compliance with laws, regulations and expectations related to or addressed expressly within this Supplier Code of Conduct. We encourage our suppliers to develop their own written code of conduct and to flow down the principles of a code of conduct to the entities that furnish goods and services.



Supplier Code of Conduct Acknowledgement & Agreement

As the undersigned to Cherokee Federal, you acknowledge and agree that:

1. We, the supplier, have received and acknowledge reviewing the Cherokee Federal Supplier Code of Conduct (this “Code”)
2. We will comply with and agree to be bound by this Code and will not take any action or fail to take any action on behalf of Cherokee Federal or any of its subsidiaries and affiliates (individually and collectively referred to as “Cherokee Federal”) contrary to this Code
3. We will ensure that our employees, subcontractors and other representatives that supply products and/or services to Cherokee Federal act in accordance with this Code

Cherokee Federal Supplier Company Name

Signatory Name & Title

Signature

Date



Please feel free to contact the Cherokee Federal Ethics & Compliance Office with your comments/questions about the Supplier Code of Conduct.

918.986.8846

complianceandethics@cherokee-federal.com

As a supplier of Cherokee Federal, reports of misconduct or ethical concerns may be done using our EthicsPoint Hotline at 918.739.7363.

