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1 Introduction

At NDT Global Group Inc. and all its direct and indirect subsidiaries (together, “**NDT Global**”), our goal is to constantly push the boundaries of technology and innovation, in order to ensure a safer, healthier, and more productive world.

Through our business, as well as our product lines, we provide innovative technologies designed to protect the safety and security of critical infrastructure and assets.

Business risk management and sustainability are essential requirements to achieve our goals while protecting the companies that comprise NDT Global.

This Supplier Code of Conduct & Ethics (the “**Code**”) defines our expectations regarding our suppliers, consultants, subcontractors, service providers, agents and distributors (together, “**Suppliers**”). We require our Suppliers to confirm in writing that they have reviewed this Code and are abiding by all of the obligations set forth therein. This Code is also formally incorporated into our contracts with all our Suppliers. To the extent that our contractual arrangements contain more detailed requirements in respect of any principles covered in this Code, this Code is intended to supplement (and not override) those contractual obligations.

2 Our Expectations

We expect all of our Suppliers to adhere to the principles set forth below.

2.1 Respect for the Law

We make it a fundamental obligation that our Suppliers comply with all applicable laws, regulations, government guidelines and government or court orders wherever we operate our business, manufacture, sell or export products or provide services (collectively, the “**law**” or “**applicable laws**”).

Our Suppliers must promptly notify us of any significant criminal or civil legal action brought against them or of any fines or administrative sanctions brought against them which relate in any way to a breach of applicable laws or the principles set out in this Code.

2.2 International Export and Trade

Our Suppliers must comply with international embargoes and sanctions, not engage in transactions in contravention of sanctions against any individual, entity or territory, and comply with export controls regulations, including obtaining required permits and licenses. This includes, without limitation, compliance with the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC), the U.S. Export Administration Regulations (EAR), the United Kingdom Export Control Order 2008, the European Union Dual-Use Regulation (EU) 2021/821 and the Export and Import Permits Act (Canada).

They must also respect safety marking, labeling, accompanying documentation and quota requirements, including accurately describing products and services, their value and country of origin on import and export documents and related invoices.

2.3 Bribery and Anti-Corruption

Our Suppliers must reject any form of fraud or corruption and comply with applicable laws against corruption. They must not make improper payments in any circumstances, including to acquire or retain business or to receive other benefits, which includes, but is not limited to, bribes, kickbacks, facilitation payments, service fees, special discounts, gifts and other forms of money or value transfers where there are reasonable grounds to believe that they are intended to secure or retain business or to obtain preferential treatment, whether directly or through intermediaries.

Offering or accepting a gift, meal, entertainment or hospitality as part of business relations must serve a legitimate purpose, be of reasonable value, consistent with local traditions, and not likely to create a sense or perception of obligation for the giver or receiver. For clarity, NDT Global does not expect any of the above from its Suppliers.

The above is especially important when dealing with foreign public officials or agents since international conventions and domestic laws often make it a criminal offence. A gift that is reasonable and appropriate under normal business conditions may, in such a situation, constitute a bribe or improper payment. In all cases, the highest ethical standards and compliance with applicable laws must be maintained.

2.4 Money Laundering/Terrorism Prevention

Our Suppliers must fully comply with all anti-money laundering and anti-terrorism laws around the world and conduct business only with reputable customers, suppliers or business partners with legitimate business activities and with funds from legitimate sources.

2.5 Protection of Privacy and Personal Data

Our Suppliers must comply with the legal framework governing the protection of privacy and personal data (i.e., information that may identify an individual), including, as applicable, the General Data Protection Regulation (GDPR) implemented by the European Union (EU) and the European Economic Area (EEA), the United Kingdom General Data Protection Regulation (UK GDPR), the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), and the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA), and other corollary laws applicable in the jurisdictions in which NDT Global does business.

We require our Suppliers to have adequate information security practices and to be committed to protecting the systems and data they store or access and to respect the privacy rights of their workforce, and all parties they deal with, including NDT Global.

2.6 Fair Competition and Trade Practices

Competition laws refer to the set of civil and criminal rules governing free and open competition. At NDT Global, we believe that everyone benefits when businesses operate in an open competitive market. Our Suppliers must comply with applicable competition laws and refrain from engaging in anti-competitive behaviour by either acting alone or with others.

Our Suppliers' prices and methods for calculating prices should be arrived at independently, without being shared with any other competitor, and without inducement to submit or not to submit an offer for the purpose of restricting competition.

2.7 Quality and Compliance

Providing high quality products and services is of the utmost importance. To ensure that the products and services of our Suppliers meet our quality requirements and those of our customers, we may require that our Suppliers participate to a quality management system assessment. In such case, our Suppliers must participate to the assessment and respond honestly and in a timely manner to our information and document requests. Instances of non-compliance will require a root-cause investigation and implementation of appropriate corrective actions. Depending on the seriousness or recurrence of the issue, NDT Global may suspend or terminate the business relationship.

2.8 Caring for People

Labor Practices

We require our Suppliers to respect the principles of the Universal Declaration of Human Rights (UDHR) and the core conventions of the International Labor Organization (ILO).

Providing a harmonious workplace, free of hostility and any form of discrimination, where all hiring, assessment and promotion are based solely on skills, professional qualities and performance are required, as well as respect and dignity, are fundamental values. Our Suppliers must not tolerate threats, intimidation, abuse (physical or verbal), behaviors intended to degrade or humiliate coworkers, or any form of harassment (sexual, psychological or otherwise). Our Suppliers must ensure that employees have freedom of movement and are free to leave their employment after reasonable notice.

Our Suppliers must also be committed to complying with labor standards, freedom of association, collective bargaining and immigration laws, as well as laws prohibiting human trafficking, modern slavery, forced labor and child and underage labor.

Equal Opportunity

Our Suppliers must ensure that all current and prospective employees receive equal treatment regardless of age, color, disability, ethnic or national origin, gender, gender expression, gender identity, marital status, pregnancy, race, ethnicity, religion or beliefs, or sexual orientation.

Harassment, Discrimination, Violence and Intimidation

Our Suppliers must have in place and apply policies to prevent harassment, intimidation, victimization or discrimination of any kind. These policies must clearly articulate their commitment to eliminating all forms of discrimination, intimidation, victimization, harassment or violence.

Accommodations and adjustments must be made whenever reasonable to enable people with disabilities to perform their jobs focusing on their abilities rather than their disabilities and valuing their contribution.

Health and Safety

We require our Suppliers to treat their workers fairly, provide a safe and healthy work environment and protect the environment, in compliance with applicable laws. Suppliers must take all reasonable measures to protect the health and safety of their workforce and are expected to operate in accordance with recognized international standards such as ISO 45001 (Occupational Health and Safety Management Systems), addressing physical safety, mental health, ergonomics, and overall well-being.

Wages, Benefits and Working Hours

Suppliers and their subcontractors shall ensure that all workers receive, at a minimum, the applicable legal minimum wage, all mandatory benefits and fair compensation for any overtime work. Working hours shall comply with all applicable laws, and employees shall be provided with regular rest periods and days off in accordance with those requirements.

Human Rights and Supply Chain Due Diligence

Suppliers are expected comply with internationally recognized human-rights and labor standards with applicable legislation governing responsible business conduct and supply-chain transparency, including, without limitation, the EU Corporate Sustainability Due Diligence Directive (CSDDD), the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG) and the Fighting Against Forced and Child Labour in Supply Chains Act (2023) (Canada).

2.9 Environmental Protection and Sustainability

Protecting the environment and preventing pollution is key to ensure sustainability and, as such, we require our Suppliers to view compliance with applicable laws as the minimum commitment. Our Suppliers must strive to improve their sustainability performance, focusing on reduction (as appropriate) of energy and primary resources consumption, waste generation, carbon emissions.

With respect to production of goods, Suppliers should ensure that any substance that poses a risk to the environment is identified, labelled, stored and disposed of in a manner that limits the risk of pollution.

In addition, Suppliers are expected to maintain environmental and energy management systems aligned with international standards such as ISO 14001 (Environmental Management Systems) and ISO 50001 (Energy Management Systems).

2.10 Integrity and Conflicts of Interest

We require our Suppliers to act with the highest of ethical standards and with professionalism, honesty, integrity, and fairness in every aspect of their business.

We require our Suppliers that they avoid any relationship or activity that may impair, or appear to impair, their ability to make objective decisions in the best interests of NDT Global and to make us aware of any potential conflicts of interest as soon as they are known.

2.11 Intellectual Property and Confidential Information

Our intellectual property and our confidential information are amongst our most important assets. It sets us apart from our competitors and helps us stand out in the markets where we operate. We therefore require that our Suppliers protect our intellectual property and our confidential information, including from any unauthorized disclosure or use. They must be used for the sole benefit of NDT Global, and not for personal purposes or for the benefit of third parties. Any breach of confidentiality must be reported to NDT Global immediately. The same principles must be applied regarding the intellectual property and confidential information of our customers and business partners.

2.12 Computer and Network Protection Rules

Our Suppliers may have access to our computers, devices, software, networks and systems (“**computer resources**”) to enable them to perform their products or services for NDT Global. They must be used only for purposes directly related to the work performed for NDT Global, in accordance with applicable laws. NDT Global reserves the right to monitor its Suppliers' use of computer resources.

Suppliers are expected to implement and maintain robust information-security and cybersecurity management systems aligned with international standards such as ISO/IEC 27001 (Information Security Management Systems) and the National Institute of Standards and Technology (NIST) Cybersecurity Framework. Suppliers should also adopt responsible-AI practices in line with emerging governance instruments, including the European Union Artificial Intelligence Act and comparable frameworks in other jurisdictions.

2.13 Media Relations/Use of Social Networks and Outside Communications

Our Suppliers must uphold standards for fair business practices, including accurate and truthful advertising.

Our Suppliers must refrain from making any statements on behalf of, or referring to, NDT Global in the media. Reference to NDT Global in communication via social media platforms is also prohibited, unless approved in writing in advance by NDT Global. Disclosure of personal or confidential information about NDT Global's employees, customers or business partners without their prior consent is as well prohibited.

2.14 Insider Information

Our Suppliers may have access to confidential or privileged information regarding NDT Global or the companies with which NDT Global does business or whose securities are traded on a stock exchange or other public market. The laws governing securities trading forbid anyone from using insider information to trade stocks, the mere act of communicating such information to a third party being prohibited. Our Suppliers must not use or communicate confidential or privileged information regarding NDT Global or the companies with which NDT Global does business.

2.15 Resilience and Business Continuity

We require our suppliers to have a sufficiently robust resilience and business continuity program, appropriate to their business and good industry practice, to protect their business operations from disruptive events that may impact the supply of goods and services to NDT Global and its customers.

Additional risk controls and resilience requirements may be communicated to suppliers depending on the nature of goods or services being supplied.

2.16 Suppliers of our Suppliers

We require that our Suppliers ensure that their own suppliers abide by the terms and conditions of the Code.

2.17 Conflict Minerals

When applicable, our Suppliers shall implement procedures to reasonably assure that the use of tin, tantalum, tungsten and gold ("**Conflict Minerals**") in the products they manufacture does not directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or an adjoining country.

Our Suppliers must exercise due diligence on the source and chain of custody of Conflict Minerals, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

2.18 Security

We require that our Suppliers maintain adequate security at all production and warehousing facilities and implement supply chain security procedures designed to prevent the introduction of non-manifested cargo into outbound shipments. Each Supplier facility must have written security procedures to document proof of adequate security controls.

2.19 Monitoring and Reporting

This Code will be reviewed on a regular basis to incorporate additional provisions when necessary.

Our Suppliers must maintain all documentation necessary to demonstrate their compliance with this Code and will provide access to such documentation upon NDT Global's request.

NDT Global shall have the right to periodically inspect the Suppliers and their facilities to verify compliance with this Code either directly or through a third-party. Such inspections may be conducted with reasonable notice to Suppliers. Suppliers are also required to disclose all material facts relating to production of products for NDT Global upon request. In addition, if non-compliances are identified during such inspections or reviews, Suppliers must develop and implement corrective action plans within reasonable timelines. These plans should outline the root cause, corrective measures, responsible parties and expected completion dates. NDT Global may conduct follow-up assessments to verify effective implementation and closure of corrective actions.

3 Questions and Reporting Violations of the Code

Concerns or questions regarding the application of this Code may be directed to a member of NDT Global's management team with whom they are dealing with. Suppliers may also report any suspected or alleged violation or impediment to this Code to a member of senior management.

Incidents can also be reported, anonymously and confidentially, to the Corporate Secretary and the Chair of the Compensation, Nominating, Governance and Sustainability Committee of NDT Global through the Mitrastech Ethics Hotline accessible by phone via the toll-free number below or via the website <https://clearviewconnects.com/#/>. This platform is available 24 hours a day, 7 days a week and is operated by Mitrastech, an independent entity. NDT Global undertakes not to retaliate against any person who, in good faith, reports a violation.

Canada/USA	844-887-2308
Germany	0800 181 5367
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United Kingdom	0330 808 4790
Brazil	0800 591 2083
Mexico	800 099 0527