

CTDI's Corporate Social Responsibility (CSR) Policy

Mission Statement

Communications Test Design, Inc. and its subsidiaries conduct business consistent with our long-established corporate values of exceptional customer service and highest quality standards by respecting and caring for our employees and communities in which we conduct business. Our commitment to our environmental and social responsibilities is engrained in the way we conduct business, and this adds value to our corporation. This CSR Policy, and the other Company policies referenced, are shared with our employees, customers, and suppliers so all can have a clear understanding of our standards for business conduct and fair business practice.

Policy Scope

This CSR Policy applies to Communications Test Design, Inc., and all its subsidiaries (hereinafter collectively referred to as "CTDI" or "Company"). It provides direction for our business decisions and actions throughout our worldwide operations, at all management levels, and applies equally to Company actions and the behavior of our employees in conducting CTDI business.

Policy Principles

There are eight (8) principles that form the basis of CTDI's Corporate Social Responsibility commitment:

1. Business Conduct and Ethics Policy

CTDI expects the highest standards of business and personal integrity and ethics. Employees are required to act following all local, state, and federal regulations and laws in any country in which the Company does business. CTDI employees are not permitted to engage in any activity, practice, or conduct which conflicts with, or appears to conflict with, the interests of CTDI, its customers, or its suppliers. In addition, employees are expected to adhere to the following guidelines:

A. Employees are expected to represent CTDI positively and ethically. Thus, employees must avoid conflicts of interest and refer questions and concerns about potential conflicts to their supervisor or the Human Resources Department. Any conflict or potential conflict of interest must be disclosed to CTDI. Failure to do so will result in discipline, up to and including discharge.

B. Employees may not engage in, directly or indirectly, either at work or outside of work, any conduct which is disloyal, disruptive, competitive, or damaging to CTDI, or which may be or may be perceived to be a conflict of interest. Employees should avoid and disclose relationships or activities that may impair their ability to make objective and fair decisions and should not be employed in other organizations that may compete with CTDI in any manner. Company property should not be used for personal gain. All Management Employees will be required to sign a Non-Compete Agreement as a condition of accepting a management position with CTDI. Employees should not provide political contributions or maintain memberships in organizations that are in the business, lobby, or compete with CTDI.

C. Employees must disclose any controlling financial interest that they or their immediate family have in any enterprise that does business with CTDI. CTDI may require an employee to divest the interest if CTDI considers the financial interest to conflict with the Company.

D. Employees and their immediate family may not accept lavish or extravagant gifts or any special discounts or loans from any person or firm doing, or seeking to do, business with CTDI.

E. Employees may not give, offer, or promise, directly or indirectly, anything of value to any representative of a current or prospective customer in connection with any transaction or business that CTDI may have with that customer or supplier.

F. Employees will prepare accurate business records and financial reports with integrity and honesty, whether they are reported externally or used internally to manage the Company's operations. Employees will maintain accurate records, favor transparency, and retain records as is reasonably necessary, and should maintain records at the direction of legal counsel when records may be needed for potential or pending litigation.

G. Corruption in all its forms will not be tolerated, including acts that are anti-competitive, evasive, coercive, or unethical, such as those that may extort or bribe another person to act.

H. Employees shall safeguard the Company's physical property and financial assets by following Company policies and procedures to prevent loss, theft, or unauthorized use. All expenditures must be undertaken for business purposes and never for personal use, with proper preauthorization. Only Directors and Officers have the authority to make contractual commitments on behalf of the Company.

2. Equal Employment for Diversity & Inclusion

A. CTDI is committed to protecting and respecting the Human Rights of all employees globally. The Company values every employee and supports employment with a safe, productive, and inclusive workplace with people of diverse backgrounds. Employment at CTDI is "at-will" and may be terminated by the employee, or CTDI, at any time. CTDI provides an equal opportunity for career assignments and development such that the personal well-being of each employee is available. Every employee is an important part of our corporate family and solidifies the foundation of our Company. Our specific commitments are to promote a positive work environment that includes open communications where employee input is encouraged and protected. CTDI takes responsibility to help protect human rights throughout the value chain as set forth in detail in our **Human Rights & Workforce Management Policy**.

B. Equal Employment Opportunity: It is the policy and practice of CTDI to offer equal employment opportunities to all qualified persons regardless of race, color, sex, age, religion, creed, marital status, national origin, genetic information, or disability to the extent required by law. This policy applies to all terms, conditions, and privileges of employment, including, hiring, placement, compensation, training, promotion, discipline, leaves of absence, transfers, and termination. In addition, as part of our commitment to equal employment opportunity, CTDI is an affirmative action employer and maintains an affirmative action plan as a management tool to ensure equal employment opportunity for all employees. CTDI complies with applicable state and local laws governing nondiscrimination in employment in every location in which the Company has facilities.

C. Diversity & Inclusion: Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and is free from discriminatory practices, including without limitation harassment. CTDI is fully compliant with the rules, regulations, and laws set forth by the Equal Employment Opportunity Commission (EEOC). Consistent with CTDI's workplace policy of equal employment opportunity, the Company prohibits and will not tolerate the discrimination against or harassment of applicants, employees, temporary assignment workers, contractors, customers, and/or vendors based on marital status, age, sexual orientation, genetic predisposition or information, and sex, including sexual harassment based on race, color, religion, creed, sex, national origin, age, disability, marital status, veteran status or any other status protected by applicable law. CTDI also prohibits the discrimination against or harassment of transgender, gender-transitioning individuals, and individuals who

self-identify as a gender opposite of the one in which they were born. All individuals are to be called by the pronoun (“he/she/they”) with which they prefer and self-identify.

D. CTDI values a diverse supply base, and it is the responsibility of each supply professional and all Company management to attract and retain a diverse base of suppliers to CTDI, as outlined in detail in our **Supplier Diversity Policy**.

3. Anti-Competitive Policy, Confidentiality, and Proprietary Information

CTDI requires all its employees to sign a Confidentiality Agreement as a condition of employment. This Agreement protects the confidential and proprietary information of CTDI and its customers and suppliers. All employees will take care in dealing with competitors and gathering information about competitors, collecting, sharing, and using competitive intelligence ethically and legally. All employees will comply with the Company **Information System Policy** regarding data and information protection at all times. Additionally, Laws that govern competition vary widely across countries. CTDI complies with the competition laws and policies in various countries that promote free and open competition.

4. Workforce Environmental, Health, and Safety

“Environmental, Health, and Safety” is the condition of being protected or free from the occurrence of a risk of injury, danger, failure, error, accident, harm, and loss of life. CTDI believes that a safe and healthy workplace is a productive workplace. Our specific commitments to providing a safe, healthy, and secure work environment are outlined in our **Environmental Health, Safety Policy**.

5. Community Involvement

CTDI promotes community involvement in all the local communities where we have operations. CTDI often sponsors community service projects, including direct funding from the Company. We also encourage and support our employees’ commitment to contributing, volunteering, and engaging in local community work.

6. 3rd Party and Supplier Relations

A. CTDI seeks to build cooperative relationships with our customers, suppliers, host governments, and other companies and communities to promote corporate social responsibility and commitment. We also seek to establish relationships with customers, vendors, and suppliers that adhere to these same corporate social responsibility principles. We require our vendors and suppliers to adhere to **CTDI Supplier Code of Conduct**.

B. CTDI is committed to financially responsible supply management characterized by integrity and transparency in all supply-related dealings and decisions. Employees will maintain truthfulness in marketing and sales and will provide a fair representation of products and services and avoid exaggerated claims and false advertising. Honesty and integrity will always be applied with Company procurement and sales processes.

7. Global Citizenship

Global citizenship fulfills our Company’s ethical and moral obligation to act for the benefit of society locally and globally with sustainable development that creates employment and wisely cares for our natural resources. In its practices, CTDI adheres to local and international laws and conforms to regulations and industry standards for environmental safety, human rights, and wellness. Furthermore, we seek to understand the cultures to demonstrate our respect for the local communities in which we operate. We strive to build strong relationships in the local business community. We are clear that CTDI does not tolerate any level of corruption, bribery, or unethical behavior. CTDI strives to meet current needs without

hindering the ability to meet the needs of future generations in terms of economic, environmental, and social challenges.

8. Environmental Commitment

CTDI is committed to protecting and preserving our natural resources through assessing our environmental impacts, setting goals for continual improvement, and routine measurement of our progress. Our environmental commitment is outlined in our **Global Environmental Policy**, which includes our initiatives on GHG emission reduction, energy and transportation efficiency, waste and water management, and materials conservation and safety. We utilize ISO and industry frameworks to inform, guide, and govern our operations through corporate program offices, including Environmental, Health & Safety, Sustainability, and Transportation.

Communication and Compliance Steps

CTDI will take reasonable steps to communicate and achieve compliance with all Company policies. CTDI is committed to correcting any condition or situation that is alleged to be unsafe or cause unfairness or misunderstanding. It is our policy that all employees have the right to voice their opinion or discuss a problem without prejudice or fear of retaliation. Accordingly, we have established an orderly **Open-Door Policy**, with procedures posted on the CTDI Intranet site so that all employees know how to express concerns such that they receive full consideration. In summary, reports of suspected noncompliance with any Company policy may be made verbally or in writing to any Manager, Director, Officer, or any Human Resources Representative – whomever an employee feels most comfortable reporting to – and the information will be forwarded to the Human Resources Department for investigation. Thereafter, an action shall be taken commensurate with the gravity of the allegation to determine if the allegation has a basis in fact and what remedial action and/or punishment is to be imposed. CTDI shall ensure that all records related to reports of wrongdoing are preserved following the law and to assure maximum protection under attorney-client privilege and attorney work-product doctrine. Communication of the Open Door Policy will be done upon hire during the General Orientation Training and annually thereafter during annual compliance training. It will also be made part of the **Employee Handbook** that all employees are given.

Reporting to Authorities

CTDI also reserves the right to inform the proper authorities for civil or criminal action based on the individual circumstances and severity of the situation.

Confidentiality

The Company will not disclose the identity of anyone who reports a suspected violation if anonymity is requested. However, during the investigation, based on the circumstances of the situation, it may become evident who filed the complaint – even though the Company will make its best effort to avoid this from occurring. Employees should be aware that the members of the Company who are participating in the investigation, are obligated to act in the best interest of the Company and do not act as personal representatives for employees.

Government Audits and Investigations

CTDI will cooperate fully in connection with all governmental audits and investigations and respond in a timely manner to all requirements imposed involvement in litigation.

Protection of Employees from Retaliation

Employees will be made to feel comfortable that they can report issues of wrongdoing, or issues they reasonably perceive to be issues of wrongdoing – without fear of retaliation for filing such a report. Anyone who does retaliate against an employee in such an instance will be subject to termination of employment for retaliation. However, an employee will be subject to disciplinary action if the Company reasonably concludes that the report of wrongdoing was knowingly fabricated by the employee or was knowingly distorted, exaggerated, or minimized to either deliberately injure someone else or to protect himself or herself.

Monitoring Program

CTDI maintains the following controls to ensure our conformity with this Corporate Social Responsibility policy:

- Orientation programs to ensure that new employees are familiar with the requirements of this policy.
- Affirmative Action tracking to ensure non-discrimination.
- Supervisory and management training on all corporate social responsibility principles.
- Exit Interviews will be done on departing employees in managerial positions to determine if the employee has any knowledge of any wrongdoing, unethical behavior, or criminal conduct.
- Accountability to uphold all standards outlined in this policy.
- Periodic evaluation of our programs and activities and identification of issues important to our social performance.

Conclusion

CTDI embraces and takes seriously its commitments to be socially responsible in the global corporate community. We will continue to be a leader in telecommunications and technology through our commitment to best practices in business conduct and ethics, employment practices, occupational safety and health, community involvement, customer and supplier relations, community respect, and our commitment to the environment.

Version: April 2022