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TABLE OF CONTENTS

1 Overview..... 1

2 Purpose..... 1

3 Highlights..... 1

4 Prequalification Requirements 2

5 Office of Foreign Asset Control 3

5.1 Responsible Sourcing of Specialty Metals and Minerals..... 3

5.2 Counterfeit Parts..... 3

6 Domestic Sourcing Requirements 4

6.1 Buy American Act..... 4

6.2 Trade Agreements Act..... 4

7 Health, Safety, and Welfare Provisions 4

7.1 Forced Labor..... 4

7.2 Child Labor, Young Workers, and Student Workers..... 4

7.3 Discrimination and Harassment 5

7.4 Fair Compensation..... 5

8 Environmental Compliance and Stewardship 5

9 Supplier Management Systems..... 5

10 Glossary..... 6

11 References..... 6

11.1 Internal..... 6

11.2 External 6

12 Revision History 7

13 Document Properties 7

1 Overview

Rocket Lab USA Inc. (“Rocket Lab”) and its subsidiaries are committed to conducting business ethically, and in a socially and environmentally responsible manner. As a US Government contractor and subcontractor, Rocket Lab’s ability to obtain and retain that business also depends on its compliance with various federal regulations, including those governing the sourcing of products, components, and materials. Prior to entering into any new vendor or supplier agreement, Rocket Lab personnel will review the requirements of this policy and ensure that all vendors and suppliers are compliant with the following requirements across their own operations and throughout their supply chains.

2 Purpose

Rocket Lab has adopted and implemented this policy to ensure that all vendors and suppliers are selected and onboarded in compliance with federal regulations. This policy is intended to promote the following:

- Conducting business with honest and ethical vendors and subcontractors.
- Compliance with limitations on sourcing certain products from prohibited parties.
- Ensuring the provision of quality products and materials to our customers.
- Understanding our supply chain and mitigating any inherent risks.
- Promptly reporting any violations to an appropriate authority.
- Accountability for adherence to these requirements.

3 Highlights

There are many federal regulations that govern what sources a company can use for products, components, or materials provided to the US Government. As new vendors are onboarded, or existing vendors are reviewed, it is important to ensure that those vendors enable Rocket Lab to meet its compliance and performance obligations. Key requirements of this Policy include the following:

- Rocket Lab may not do business with any entities that are suspended, debarred, or proposed for debarment by any federal agency. Prior to awarding a subcontract under a US Government funded program to any vendor, that vendor must certify that it is not suspended, debarred, or proposed for debarment by any federal agency.
- Rocket Lab may not acquire for use in the performance of a US Government contract or subcontract any supplies or services if that transaction would be prohibited by proclamation, Executive order, or statute or regulation administered by the Office of Foreign Asset Control. This includes any vendors with principles on the Specially Designated Nationals or Block Persons lists.
- Rocket Lab may not use, or provide to the US Government, any telecommunications or video surveillance equipment or services produced or provided by Huawei Technologies Company, ZTE Corporation, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company. Any subsidiaries and affiliates of these entities are also prohibited sources for these products.

- Rocket Lab is often required to meet certain domestic content requirements, and source certain items from only U.S. or qualifying country sources.
- Rocket Lab must ensure that each supplier complies with all labor regulations and environmental laws applicable to the supplier's business.

4 Prequalification Requirements

Suspended & Debarred Contractors & Subcontractors

US federal law restricts the ability of contractors to subcontract with individuals or entities that are debarred, suspended, or proposed for debarment. Rocket Lab personnel will not knowingly enter a new contract or subcontract with, make a new purchase from, or enter into any new business relationship with any individual or company that is listed by a federal agency as debarred, suspended, or otherwise excluded from contracting awards.

Companies that have been suspended, debarred, or excluded from US Government procurements, or proposed for debarment from US Government procurement awards, are listed as excluded in the System for Award Management ("SAM"), which is available at www.sam.gov¹. Rocket Lab will not contract with any entity listed on SAM (or a successor site) as currently excluded. This database must be reviewed by Rocket Lab prior to engaging the services of any individual or entity in connection with any contract or subcontract. If during the performance of a US Government contract or subcontract you become aware that a subcontractor or vendor has been debarred, suspended, or proposed for debarment, you must immediately notify your supervisor and the Legal Department.

Telecommunications & Video Surveillance Equipment & Services

Rocket Lab is prohibited from using certain telecommunications or video surveillance equipment or services as a substantial or essential component of any system or as "critical technology" as part of any system. The prohibition applies to systems, equipment, and services used by Rocket Lab, regardless of whether the equipment, systems, or services are used in performance of a US Government contract or are part of deliverables to the Government. The ban applies to telecommunications and video surveillance equipment produced or provided by the following entities:

- Huawei Technologies Company
- ZTE Corporation
- Hytera Communications Corporation
- Hangzhou Hikvision Digital Technology Company
- Dahua Technology Company
- Any subsidiary or affiliate of such entities

It is possible that this list could be expanded to other Chinese companies in the future.

This prohibition includes the purchase or lease of hardware, software, or component parts. This also includes equipment that an employee may utilize at home for work, such as phones, laptops, docking stations, monitors, webcams, and routers. All personnel that support Rocket Lab's US Government contract and

¹ <http://www.sam.gov>

subcontract work are required to adhere to this requirement. If you have questions about this policy, please contact the Legal Department, or the other resources identified in this Supplement.

5 Office of Foreign Asset Control

Except as authorized by the Office of Foreign Assets Control (OFAC) in the Department of the Treasury, Rocket Lab shall not acquire, for use in the performance of a contract, any supplies or services if any proclamation, Executive order, or statute administered by OFAC, or if OFAC's implementing regulations at 31 CFR Chapter V, would prohibit such a transaction by a person subject to the jurisdiction of the United States.

Except as authorized by OFAC, most transactions involving Cuba, Iran, and Sudan are prohibited, as are most imports from Burma or North Korea, into the United States. Lists of entities and individuals subject to economic sanctions are included in OFAC's List of Specially Designated Nationals and Blocked Persons at <https://home.treasury.gov/policy-issues/financial-sanctions/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>. More information about these restrictions, as well as updates, is available in the OFAC's regulations at 31 CFR Chapter V and/or on OFAC's website at <https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>. Prior to onboarding a new vendor, Rocket Lab employees must check these lists to ensure the vendor and/or its principles are not listed.

5.1 Responsible Sourcing of Specialty Metals and Minerals

For US Department of Defense contracts and subcontracts, components meeting the definition of a "specialty metal" must be procured only from qualified countries. A "specialty metal" includes some types of steel and metal alloys, as well as titanium and titanium alloys and zirconium and zirconium alloys. Items or components meeting these definitions must be procured from qualifying countries. The list of qualifying countries is available here: [225.003 Definitions](#). | [Acquisition.GOV](#).

Rocket Lab will conduct sufficient analyses of products, parts, or components supplied for US Government contracts to determine whether a specialty metal is present in the items. If so, Rocket Lab will obtain sufficient information from its suppliers and vendors to ensure that the specialty metals are sourced from qualifying countries only.

Similarly, Rocket Lab shall exercise due diligence that is in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Rocket Lab shall prevent the use of 3TG minerals (gold, tin, tantalum, and tungsten) that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or the adjoining countries. Upon request, suppliers shall provide Rocket Lab with a complete and accurate Conflict Minerals Reporting Template (CMRT) covering the origin of 3TGs in the parts supplied to Rocket Lab for the relevant reporting year.

5.2 Counterfeit Parts

The Department of Defense Federal Acquisition Supplement and Section 818(b) of Public Law No. 112-81 related to electronic and nonconforming parts holds US government contractors responsible for detecting and avoiding the use of counterfeit parts or suspected counterfeit parts, including embedded software or firmware in an electronic part. To the maximum extent possible, Rocket Lab shall procure parts from Original Equipment Manufacturers (OEMs) or their authorized/franchised distribution chains. When onboarding new vendors, Rocket Lab shall perform an assessment of the vendor to ensure that it meets counterfeit prevention industry standards and processes, and there is appropriate traceability of the part being procured.

6 Domestic Sourcing Requirements

Rocket Lab is required to comply with the requirements of the Buy American Act (“BAA”) and the Trade Agreements Act (“TAA”) as applicable. To comply with these requirements, Rocket Lab may be required to ask for sourcing information from suppliers and vendors. Rocket Lab will track the locations of all subcontractors used to fulfill US Government contracts and subcontracts.

6.1 Buy American Act

The BAA applies to certain contracts that involve the provision of iron, steel, and manufactured goods. If those criteria are met, at least 65% of the constituent parts or materials must originate in the United States. For orders meeting these criteria, Rocket Lab will ensure that these thresholds are met by obtaining the necessary information from its suppliers and vendors regarding the sources of relevant material.

6.2 Trade Agreements Act

The TAA prohibits procuring products and services from non-designated country sources in contracts valued over the specified threshold. This includes the United States, and qualified countries with which the United States has a trade agreement in place. The list of designated countries is available here: [Look up Trade Agreements Act-designated countries | GSA](#)². Prior to purchasing any components or products for TAA-covered programs, Rocket Lab will obtain sourcing and country of origin information from its suppliers and vendors.

7 Health, Safety, and Welfare Provisions

7.1 Forced Labor

Rocket Lab’s suppliers and vendors shall comply with all local labor laws applicable to their businesses. Forced labor of any form is not permitted at any point in Rocket Lab’s supply chain, including, but not limited to bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, and slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. There shall be no unreasonable restrictions on workers’ freedom of movement in a supplier’s facility, or unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, workers’ dormitories or living quarters.

7.2 Child Labor, Young Workers, and Student Workers

Child Labor, especially as defined in ILO Convention 182 (prohibiting and eliminating the worst forms of child labor), shall not be used at any stage of manufacturing or the provision of services in Rocket Lab’s supply chain. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including

² <https://www.gsa.gov/buy-through-us/purchasing-programs/multiple-award-schedule/help-with-mas-contracts-to-sell-to-government/roadmap-to-get-a-mas-contract/readiness-assessment-for-mas-offerors/look-up-trade-agreements-actdesignated-countries>

night shifts and overtime. When onboarding new vendors, Rocket Lab shall ensure that the vendor has implemented appropriate mechanisms to verify the age of its workers.

In the case of student workers, apprentices and interns, suppliers shall partner only with legitimate workplace learning programs and educational partners. Suppliers shall ensure the rights of student workers, apprentices, and interns are respected according to all local laws and regulations. Student workers, apprentices, and interns shall receive fair compensation equal to other entry-level positions and be provided with the appropriate support and training.

7.3 Discrimination and Harassment

It is Rocket Lab's policy to ensure that its suppliers and vendors commit to a workplace free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status. This applies to hiring processes and employment practices such as wages, promotions, rewards, and access to training. Suppliers should commit to promoting diversity and inclusion in the workplace and make reasonable accommodations for religious practices and disabilities. There shall be no harsh or inhuman treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment.

7.4 Fair Compensation

Rocket Lab is committed to working with vendors and suppliers that offer fair compensation to its staff.

Compensation paid to such workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Working hours shall not exceed the maximum number set by local law. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.

8 Environmental Compliance and Stewardship

Rocket Lab is committed to respecting and protecting the environment and expects all our suppliers to join us in this commitment. Suppliers shall minimize or eliminate the emission and discharge of pollutants and overall generation of waste by their operations. Furthermore, suppliers shall work to reduce the environmental impact of their operations and those of their own suppliers. This includes controlling air pollution, emissions, water use and pollution, disruptions to biodiversity, use of renewable energy, and recycling.

Rocket Lab's suppliers must obtain and maintain all required environmental permits, approvals, and registrations. These shall be kept up to date and all their operational and reporting requirements shall be followed. Suppliers shall identify, label, and manage chemicals, waste, and other materials posing a hazard to humans or the environment to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

9 Supplier Management Systems

Rocket Lab's suppliers shall establish management systems that uphold their commitment to conforming with the human rights, environmental, and ethical principles outlined in this Code, in addition to complying with applicable laws and regulations. Management systems shall contain the following elements:

1. **Policies:** Suppliers shall adopt human rights, health and safety, environmental, and ethics policy statements and procedures that are clearly communicated to employees and suppliers.
2. **Management Accountability and Responsibility:** Suppliers shall identify senior executive(s) and company representative(s) responsible for reviewing and ensuring the implementation of the above-mentioned policies and procedures.
3. **Risk Assessment and Risk Management:** Suppliers shall adopt a process to identify human rights, environmental, and ethics risks associated with the company's operations. This process should involve a system for creating and maintaining documents and records. Suppliers shall demonstrate a commitment to continuous improvement.
4. **Corrective Action Process:** Suppliers shall establish a corrective action process for the timely resolution of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.
5. **Communication and Training:** Suppliers shall communicate clear and accurate information about the company's policies, practices, expectations and performance to workers, suppliers, and customers. Suppliers shall establish training programs so managers and workers can implement the policies and procedures described above.
6. **Stakeholder Engagement and Non-Retaliation:** Suppliers shall facilitate two-way stakeholder engagement to obtain feedback on operational practices and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of retaliation. Suppliers shall have a process for personnel to be able to raise concerns that ensures the confidentiality, anonymity and protection of whistleblowers.

10 Glossary

Glossary Term

No content found.

11 References

11.1 Internal

Parent Process Manual

No content found.

Level 4 Docs that support this Standard

No content found.

11.2 External

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12 Revision History

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1	@Sophia Jones	📅 20 Feb 2025	Initial Release / Baseline

13 Document Properties

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Summary	Standard defining Supplier Code of Conduct
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Export Classification

This document does not contain any export-controlled technical data and is not subject to regulation by any U.S. Export control regime.

Legal Warning

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