



Date: November 27, 2024

Corporate CTPAT Policy & Statement of Commitment


Implemented in November 2001, Customs Trade Against Terrorism or "CTPAT" is a voluntary joint government-business initiative to build cooperative relationships that strengthen overall supply chain and border security. Key Tronic Corporation has been a member of the CTPAT program since 2003. Membership in the program provides the company an opportunity to play a major role in the war against terrorism and ensure a more secure supply chain for its employees and business partners. As an active CTPAT member, U.S. Customs and Border Protection (CBP) requires Key Tronic to ensure the integrity of its security practices, and communicate its security guidelines to its business partners within the supply chain in accordance with the published minimum-security requirements (www.cbp.gov).

It is the policy of Key Tronic Corporation to comply with all applicable CTPAT requirements and to implement, follow, and maintain supporting procedures and practices, in addition to promptly reporting potential security breaches or suspicious activity. This policy is applicable to all foreign and domestic subsidiaries, employees, and business partners. Key Tronic Corporation, its executives, management, and other policy-makers commit to participate in the CTPAT program and support compliant business practices consistent with the minimum CTPAT Security Criteria enforced by CBP. The Corporate Trade & Compliance Department, under the oversight of the Executive VP of Administration CFO & Treasurer, shall be empowered to administer the Corporate CTPAT Program. **As a CTPAT participant, Key Tronic Corporation is committed to the following:**

- Assist in the worldwide campaign to stop Terrorism and Transnational Crime in addition to taking meaningful steps to mitigate risks posed by: Agricultural pests and/or contamination; Trade Based Money Laundering (TBML); Forced Labor & Human Trafficking; Cybercrime; and Smuggling.
- Implement, follow, and maintain procedures and practices that are consistent with minimum CTPAT Security Criteria.
- Ensure cargo and conveyances are secure, sealed and protected in compliance with CTPAT throughout global supply chain.
- Cooperate with CBP during the CTPAT validation and re-validation process.
- Communicate and Provide CTPAT guidelines and training for Key Tronic employees, contractors, service providers, and others as appropriate.
- Conduct appropriate due diligence of all applicable business partners in accordance to CTPAT requirements.
- Provide a safe and secure environment for our employees, business partners, and visitors.
- Investigate any situation or significant event related to a breach in cargo security or any CTPAT criteria, and promptly report suspicious activities, anomalies and security breaches to the SCSS and law enforcement as appropriate.
- Conduct an annual review of the company's CTPAT program, security profile and procedures and make updates as necessary.
- Conduct an annual risk assessment of the company's CTPAT Program and take appropriate corrective action.
- Failure to comply with this policy may be sufficient cause to initiate disciplinary action up to and including the termination of an employee or revocation of a business partners' "approved" status.

Security is everyone's responsibility; CTPAT affects nearly every department within our organization and supply chain as well as outside entities such as carriers and suppliers. **All Key Tronic Corporation subsidiaries, employees, contractors, service providers, visitors, and others are expected to comply with the CTPAT security requirements as well as any policies, procedures, and instructions issued by Key Tronic Corporation.**


Brett Larsen,
President and Chief Executive
Officer


Tony Voorhees,
EVP of Administration CFO &
Treasurer


Duane Mackleit,
Executive V.P. of Operations & Program
Management

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To report a security breach or suspicious activity, contact your supervisor, local law enforcement or call
1-800-Be-Alert or 1-800-232-5378