

MCD CODE OF ETHICS FOR SUPPLIERS

INTRODUCTION

MCD is committed to conduct every aspect of its business with integrity.

MCD's vision, mission and core values demand collaboration throughout the value chain. This involves behaving ethically, complying with the rule of law, and adhering to the various elements of our code of business conduct.

We expect our suppliers to respect and comply with our principles that cover the following aspects:

ENVIRONMENT

Suppliers shall comply with all applicable environmental laws and regulations and they shall act in a manner that protects the environment.

Suppliers shall be responsible for any substance/material used in production process, packaging and purchased items and they ensure the respect of existing and future legislation related to substance restrictions. In case of any deviation, the suppliers will immediately inform MCD and will present an emergency plan to address the deviation.

SOCIAL RESPONSIBILITY

Human rights:

Suppliers will guarantee the respect of International Labour Organization principles and any additional national granted rights.

Suppliers will respect the rights of employees to form or join trade unions.

Suppliers must engage in a non-discrimination behavior and treat their employees fairly, with dignity and respect.

Labor standards:

Suppliers shall comply with the Modern Slavery Act 2015 and will ensure that all employees have been recruited on a purely voluntary decision.

The minimum working age must not be younger than 15 years or stated by local legislation and the employees under the age of 18 will work under the conditions of the local legislation.

Supplier shall respect the national legislation relating to working hours and wages. Also the employees will have minimum one day off for every 7-day period.

Health and safety:

Suppliers shall ensure healthy and safety working conditions and a system that will allow to identify, reduce and eliminate any related risks (employees shall be able to report incidents or risks and the system should be able to track and manage those reports).

INTEGRITY

Suppliers will engage to respect MCD Anti-bribery and Anti-corruption policy and will not offer any form of bribery, favour, gift to MCD employees and their immediate family members.

Suppliers will commit to an ethical conduct in any business interaction and shall respect all applicable anti-trust and competition laws.

Suppliers shall engage in a responsible sourcing of minerals and will guarantee that the mineral used in products do not originate from conflicts sources within the Democratic Republic of Congo region and will inform MCD whether tin, tantalum, tungsten and/or gold are present in the products supplied to MCD. Any report or information requested by MCD shall be provided.

Suppliers will commit to not disclose MCD intellectual property, know-how, information, documents without a written approval from MCD authorized persons.

Suppliers will guarantee the use of employee data with strict confidentiality and in accordance with the relating legislation.

TRANSPARENCY

Suppliers shall commit to respect the MCD code of ethics and to provide to MCD any reports related to that. Any deviation, the supplier will engage to take the corrective action promptly. Suppliers are also responsible for his own suppliers and subcontractor compliance. Suppliers will commit to provide accurate information and accept any audit MCD may organize.

mcd