

ABAC POLICY & PROTECTION OF HUMAN RIGHT

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.

The MCD's Business Principles sets mandatory requirements for all persons -below named "the Parties" - that enter into any agreement with MCD, whether it is customers, suppliers and their sub-suppliers.

MCD encourages all of its Parties to go beyond the MCD code requirements and strive for continuous improvement across all of the areas it encompasses.

COMPLIANCE WITH ANTI-CORRUPTION LAWS AND OTHER LAWS AND REGULATIONS

MCD & the Parties shall comply with applicable laws and regulations relating to anti-corruption, including, without limitation, (i) the UK Bribery Act 2010; and the U.S. Foreign Corrupt Practices Act of 1977, 15 U.S.C. §§ 78dd-1, *et seq.* ("FCPA") irrespective of the place of performance, and (ii) laws and regulations implementing the Organization for Economic Cooperation and Development's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the U.N. Convention Against Corruption, in the partner's country or in any country where performance of this contract will occur.

In carrying out its responsibilities under this contract, the Parties represents that:

- Will not pay, offer, give, accept, demand, promise to pay, or authorize the payment directly or indirectly of anything of value to (i) any person or firm employed by or acting for or on behalf of any customer, whether private or governmental, or (ii) any government official or employee or any political party or candidate for political office for the purpose of influencing any act or decision or inducing or rewarding any action by the customer in any commercial transaction or in any governmental matter or securing any improper advantage to assist one of the Parties in obtaining or retaining business or directing business to any person.
- Will not offer, promise, give, accept, demand or use any funds for unlawful contributions, gifts or entertainment.
- Will not make, either directly or indirectly, any improper payments, including but not limited to facilitation payments, gratuities or kickbacks.
- Has established and will maintain an effective business ethics and compliance program and procedures to prevent corruption and ensure compliance with applicable laws or regulations.
- Will promptly disclose to MCD together with all pertinent facts any violation, or alleged violation, of any applicable law or regulation in connection with the performance of this contract.

HUMAN RIGHTS AND LABOUR STANDARDS

MCD & the Parties shall support and respect the protection of internationally proclaimed human rights and must not be complicit in any form of human rights abuse.

Specifically, the Parties must:

- Provide their employees with a safe and healthy working environment.
- In addition to complying with applicable laws, comply with relevant industry standards on working hours. The Parties must provide rest days and ensure that any overtime is properly documented and compensated.
- Compensate workers in a way that meets or exceeds minimum local standards and in an amount that is sufficient to meet basic human needs in the applicable community.
- As legally permitted, allow workers to freely associate with others, form, and join organisations of their choice, and bargain collectively. MCD does not accept disciplinary or discriminative actions from the employer against employees who choose to peacefully and lawfully organise or join an association.

Furthermore, the Parties must:

- Not tolerate any form of discrimination during recruitment or employment. This includes, but is not limited to, discrimination on the basis of race, ethnicity, religion, age, sex, marital status or sexual orientation in its workplace.
- Not use any form of forced or compulsory labour. All labour must be voluntary.
- Not engage in or support trafficking of human beings or any form of slavery.
- Not use child labour. No persons may be employed or engaged in any work if they are below the legal working age. Furthermore, MCD requires that no child be engaged in any form of work that could be harmful to his/her health, moral or social development, even if the applicable legal working age is below 18.