



## **MTG Supplier Code of Conduct**

MTG Group conducts every aspect of our business with honesty, integrity and openness.

MTG Group (“MTG”) always respects the human rights and the interests of employees, customers and third parties. Responsibility is at the core of our business, and we are committed to international initiatives and standards such as the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the Fundamental Conventions of the International Labor Organization and the UN Universal Declaration of Human Rights.

We want to develop and keep strong business relationships with suppliers who are committed to ethical standards equivalent to our own. This Supplier Code of Conduct (“Code”) sets out the standards with which all companies providing products and/or services to any MTG Group company (“Suppliers”) are expected to comply. This includes the Suppliers’ employees, consultants and sub-contractors.

Suppliers shall monitor their compliance with this Code on an ongoing basis. If requested, Suppliers shall provide MTG with relevant information and data to verify this compliance.

To ensure compliance with the Code, the Supplier shall, upon request, participate in a self-assessment process organized by MTG. MTG, or a third party assigned by MTG, has the right to conduct reviews or audits on how the Suppliers and Sub-suppliers fulfil the requirements set forth in the Code.

The Supplier agrees to cooperate during such reviews or audits. The Supplier shall ensure that MTG has a corresponding right to audit any of its sub-suppliers.

Failure to comply with the standards and provisions set out in this Code may result in MTG reviewing and potentially ending our co-operation with a Supplier.

### **Following applicable laws**

We are committed to conducting our business in full compliance with all applicable laws and regulations. We expect the same commitment from our Suppliers. Stricter rules than those described in this Code may be in place in certain countries or business areas. Where multiple rules address the same subject, and do not conflict with each other, the highest standard shall be applied.

### **Committing to our people and our world**

We expect our Suppliers to respect internationally recognized principles relating to human and labor rights, and to conduct business in ways that protect the environment.

### **Diversity, equality and non-discrimination**

Suppliers shall recognize and be committed to upholding the human rights of workers and treat them with the dignity and respect indicated by internationally recognized principles. Suppliers shall have fair hiring and employment practices to ensure there is no discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status. In addition, workers or potential workers shall not be subjected to any medical or pregnancy tests that could be used in a discriminatory way. There is to be no harsh or inhumane

treatment, including sexual harassment or abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, nor is any such treatment to be threatened.

## **Working conditions**

Forced, bonded or indentured labor, human trafficking or involuntary prison labor is not to be used. All work shall be voluntary, and workers shall be free to leave upon reasonable notice.

Child labor is not tolerated. The term “child” refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education or the minimum age for employment in the country. Workers under the age of 18 shall not perform hazardous work, heavy work and may be restricted from night work out of consideration for their educational needs. The use of legitimate workplace apprenticeship programs and internships that follow all applicable laws and regulations is supported.

MTG respects and supports children’s rights and expects all Suppliers to do the same. Suppliers must have a good understanding of child protection and must have in place working practices that protect the welfare of children.

Working weeks are not to exceed the maximum hours set by local law. Compensation paid to workers shall follow all applicable wage laws, including those relating to minimum wages, overtime and legally mandated benefits. Any disciplinary wage deductions are to conform to local law.

Suppliers are to respect the right of workers to associate fairly and to communicate openly with management about working conditions without fear of reprisal, intimidation or harassment. Workers’ rights to join labor unions, seek representation and join workers’ councils per local laws shall be acknowledged. Suppliers shall not penalize workers for lawful participation in labor organization activities.

## **Health and safety**

Suppliers shall ensure that workers are provided with a healthy and safe working environment following internationally recognized standards. Suppliers shall do their utmost to control hazards and take necessary precautionary measures against accidents and occupational risks. Suppliers shall ensure that workers receive adequate and regular health and safety training and education. Suppliers shall regularly identify occupational hazards affecting their staff and implement measures to mitigate the identified hazards to an acceptable level, at a minimum fully complying with all applicable laws and regulations. Suppliers must have clear procedures in place to ensure that emergency situations are dealt with in a way that minimizes harm to life, environment and property. For example, the Supplier must ensure that there is sufficient fire protection in place as well as the provision of personal protective equipment to employees at company cost. Work related accidents must be reported, investigated and preventative measures must be introduced by the Supplier.

## **Environment**

Suppliers shall conduct business in ways that protect and preserve the environment. Suppliers are to take a precautionary approach towards environmental and climate challenges, and to undertake initiatives to promote greater environmental responsibility and the development of environmentally friendly technologies.

MTG encourages all its suppliers to continuously watch their energy use and take all practical steps to reduce energy consumption.

MTG further asks its suppliers to prioritize renewable energy sources, where available at competitive prices, and to take all practical steps to manage the greenhouse gas emissions caused by the supplier’s operations.

MTG expects its suppliers to be considerate of the environmental impact of their operations, and to manage emissions to air, water and soil as well as reduce the waste generated by the supplier’s operations. Whenever possible, operations byproducts should be reused and recycled.

MTG's suppliers should carefully plan and manage their water consumption, treating and reusing the consumed water when possible.

The use of hazardous chemicals by all suppliers should be kept to a minimum. Where hazardous chemicals have to be used, the supplier shall ensure safe handling, storage, and disposal of the substances. All substances should be properly marked and substances that have been restricted or regulated by the European Union directives REACH and RoHS are to be respected.

MTG particularly encourages Suppliers to minimize their environmental impact and to improve their environmental performance on a continuous basis.

## **Protecting data and information**

We expect our Suppliers to respect individuals' right to privacy, and to handle personal data and confidential information responsibly.

Suppliers shall respect every individual's right to privacy. This includes complying with all applicable data protection laws and regulations when personal data and information are collected, stored, processed, or transferred. We also expect our Suppliers to protect confidential information from unauthorized disclosure or misuse.

## **Fair business practices**

We expect our Suppliers never to compromise on ethics when doing business.

### *Bribery and corruption*

Corruption in all its forms including but not limited to bribery, facilitation payments and nepotism is strictly prohibited.

Suppliers shall ensure that they, or any associated persons, do not engage in any form of bribery or corruption in relation to MTG's business. Suppliers shall not, either directly or indirectly, offer gifts to MTG Group employees or representatives, or to anyone closely related to these parties. Hospitality, such as social events, meals or entertainment, may be offered in order to develop business relationships. However, this hospitality must be reasonable and proportionate to the circumstances, and the cost should be kept within appropriate limits.

MTG encourages all Suppliers to implement and keep a systematic approach to anti-corruption that is aligned with internationally recognized standards. The Supplier shall develop and implement an anti-corruption policy (this does not have to be a stand-alone policy but can be part of another policy), as well as internal control measures. Anti-corruption training shall be provided to managers and to employees working in positions prone to corruption, such as procurement, sales, and financial transactions.

### *Conflicts of interest*

Business decisions shall not be motivated or influenced by personal relationships or interests. The Supplier shall not engage nor enter business relationships that creates or gives the appearance of a conflict of interest. We expect our Suppliers to inform MTG immediately if a situation arises which appears to involve a conflict of interest.

### *Fair competition*

The Supplier shall respect free market regulations, meaning it is strictly forbidden to take part in cartels for price adjustments, market distortion or beneficiary services. Suppliers shall not enter into any agreements (written or oral), or engage in other forms of activities, which prevent or restrict competition and breach applicable competition laws.

### *International business*

MTG respects international sanctions that may be imposed on countries, entities or individuals, either multilaterally or unilaterally. We expect our Suppliers to do the same.

## Asking questions and reporting concerns

MTG encourages our Suppliers to ask questions about any matter related to this Code, and to report any ethical concerns or suspected cases of non-compliance with this Code in MTG's whistleblower system found at: <https://whistleblowersoftware.com/secure/MTG>

Suppliers can contact their local contact or legal department. If the local contacts cannot help please contact, MTG's Legal (legal@mtg.com), or Communications (communications@mtg.com) departments.

## Document history and change information

| Version | Revision Date | Change information  |
|---------|---------------|---|
| 1       | 2019-05-20    | Initial Code of Supplier Conduct                                      |
| 1.1     | 2020-12-09    | Expanded sections on environmental responsibility and health & safety |