



SUPPLIER CODE OF CONDUCT

INTRODUCTION

MHS is committed to conducting its business consistent with the highest ethical standards and legal requirements wherever it operates and accordingly we expect and require our suppliers to uphold to the same values. Suppliers must comply with all applicable laws where they operate and must adhere to this Supplier Code of Conduct (hereinafter referred to as the “Code”) while doing business with or on behalf of an MHS entity.

SCOPE

The Code applies to all suppliers and their employees, agents, subcontractors and any one in their supply chain, wherever located.

BUSINESS INTEGRITY

- **No Corruption or Bribery**

We expect you to maintain a zero-tolerance policy prohibiting any form of corruption and bribery. Kickbacks, inappropriate or lavish gifts are strictly prohibited. As an MHS supplier, you are required to fully adhere to MHS Global Anticorruption & Antibribery Policy.

- **Fair Competition**

Suppliers must adhere to the principles of fair dealing. You must not engage in price fixing, bid rigging, allocation of markets or customers, abuse of your market power, or any other similar anti-competitive activities.

- **Avoid Conflicts of Interest**

You should avoid any conflict of interest or situations giving the appearance of a conflict of interest when dealing with MHS and you must report to MHS any actual or potential conflict of interest between you and MHS, for example, any financial interest that an MHS employee may hold in your business.

- **Confidential Information**

We expect you to have adequate internal procedures and take every effort to protect any and all confidential information disclosed by MHS during the course of business.

- **Protection of Privacy**

Suppliers must have adequate internal policies and procedures to protect personal data obtained from MHS (including without limitation name, email, phone number, etc.) and comply with applicable legal requirements with respect to the use, storage or transmission of such data.

- **Trade Compliance**

Suppliers shall in strict compliance with all applicable trade and export control regulations.

- **Information Security**

Suppliers must comply with the terms of the MHS Information Security Management System (ISMS), conducting themselves in a manner consistent with the ISMS Policy and supporting its Objectives. Suppliers also agree to comply with the terms of the MHS Vendor Information Technology Policy.

LABOR & HUMAN RIGHTS

- **Respect & Dignity**

Suppliers shall demonstrate a zero-tolerance policy prohibiting any type of workplace discrimination, harassment, abuse or retaliation.

- **Fair Compensation**

Suppliers must follow all applicable laws governing wage and benefits, and if these do not exist, we expect Suppliers to compensate their employees fairly and honestly.

- **Prohibition of Child Labor**

Suppliers shall not employ workers under the statutory minimum working age in the applicable jurisdiction, and in the absence of such local laws, under the age of 15.

- **Prohibition of Forced Labor**

Suppliers shall not use any type of forced labor, including without limitation forced recruitment for use in armed conflict, human trafficking, use in illegal activities.

- **Freedom of Association**

Suppliers must recognize and respect employees' legal right to freedom of association and collective bargaining without interference and without the fear of discrimination or retaliation.

- **Responsible Sourcing of Minerals**

Suppliers must commit to sourcing minerals in an ethical and sustainable manner. Suppliers are especially prohibited from purchasing "conflict minerals" from sources where Suppliers know or should have known that proceeds of sale may be used, directly or indirectly, to finance armed militias or contribute to human rights abuse.

HEALTH & SAFETY

Safety is one of MHS core values. Suppliers must fully comply with applicable laws, regulations or standards governing occupational health and safety, and provide a safe and healthy workplace to your employees. We expect you to provide adequate safety and awareness training to your employees, subcontractors or anyone in your supply chain on workplace hazards, procedures, safeguards. Use of adequate protective equipment is essential to workplace safety.

ACCOUNTING & RECORDS

Suppliers must maintain accurate books, accounting, records, and other business documentation, and upon request shall make such records available to MHS for verifying its compliance with this Code.

REPORTING CONCERNS

If you have any questions regarding the Code or become aware of an actual or suspected violation of the Code, we urge you to promptly contact your MHS business point of contact or email to Compliance@mhsglobal.com. If you prefer to contact us anonymously, you may use our Compliance Hotline, hosted by Lighthouse Services, an independent third-party provider, by following one of the methods listed below.

- **Website:** www.lighthouse-services.com/mhsglobal
- **Toll-Free Telephone:**
 - English speaking: 833-490-0001
 - Spanish speaking: 800-216-1288
- **E-mail:** reports@lighthouse-services.com (must include MHS name with report)

MHS reserves the right at all times to verify the compliance with these obligations through audit with or without the support of third party experts and / or internationally recognized organizations focused on human rights and child labor (e.g. Amnesty International, UNICEF) for the execution of the verification. This includes access to all relevant information as well as to all persons, locations and documentation concerned.

Any violation of the Code shall be considered as a material breach by your company. MHS reserves the right to take legal actions, including suspending or terminating the business relationship.

Updated September 5, 2019