

The Supplier Code of Conduct

The *Supplier Code of Conduct*, outlines the minimum requirements and expectations for the ethical behavior of Company suppliers. These standards apply to all suppliers of goods and services to any Company business or supplier (collectively "suppliers"), regardless of location. Upon delivery of any good or service to Company, all suppliers certify that they comply with the policies and standards contained in this Code of Conduct. Company shall have the right at any time and will from time to time evaluate, audit and inspect (or have a third party evaluate, audit and inspect) supplier's facilities, books and records to assure compliance with this Code of Conduct. Company reserves the right to discontinue business relationships with suppliers who violate any policy or standards contained in this Code of Conduct.

Ethical Behavior

All suppliers are expected to maintain the highest standards of honesty and integrity in all business practices in full cooperation with The Supplier Code of Conduct and *The Guide to Business Conduct – Guiding Principles*.

Compliance with Laws

All suppliers must fully comply with all applicable national, state and/or local laws, regulations, and ordinances. In addition, suppliers must be fully compliant with their obligations with respect to any applicable agreement, understanding or other binding commitment.

Labor Standards and Human Rights

The Company forbids the use of child and compulsory labor, human trafficking and slavery, unsafe and hazardous working conditions and environments, and any behavior that does not maintain human dignity and respect.

Health & Safety

Suppliers must provide safe and healthy working environments. Suppliers are required to implement policies that prohibit the use of illegal weapons, harassment in the workplace and the illegal use or possession of alcohol, drugs and other controlled substances in the workplace.

Equal Employment

Suppliers must implement hiring practices that prohibit discrimination on the basis of age, culture and language, disability, ethnicity, gender identity, marital or family status, national origin, race or color, religious beliefs, sex, sexual orientation, or any other characteristic protected by law. These principles extend to all employment decisions, including recruiting, hiring, training, promotions, compensation, benefits, transfers and workforce reductions.

Conflicts of Interest

Suppliers must avoid all transactions or relationships that are or appear to be conflicts of interest.

Gifts and Entertainment

Suppliers are permitted to make reasonable and customary gifts to Company employees in the ordinary course of business provided that no improper remuneration will be permitted under any circumstance. Furthermore, suppliers should avoid excessive or frequent gift giving to Company employees; specifically, suppliers should ensure that any gifts to Company employees will not be perceived as a bribe, payoff or any other attempt to gain an advantage in any sourcing or other purchasing decision. Company employees cannot accept or give gifts in excess of USD \$50.

Bribes and the U.S. Foreign Corrupt Practices Act

Any bribe or improper payment, whether or not it directly or indirectly benefits Company, is prohibited. Bribes include: cash, kickbacks or kickback schemes, unexplained rebates, payments for advertising or other disguised allowances or expenses. In addition, all suppliers are required to fully comply with all applicable anti-corruption laws including, without limitation, the U.S. Foreign Corrupt Practices Act (FCPA)

Freedom of Association and Collective Bargaining

Suppliers must respect the rights of workers to lawfully form or join trade unions of their choosing and to bargain collectively.

Sustainability and Social Responsibility

Company expects its suppliers to execute business practices that preserve and protect the environment, contribute to the social well-being of the communities in which they do business and have operations, and demonstrate accountability and transparency in sustainability performance.

Ineligible Suppliers

Company will not do business with any supplier if any of its officers, directors, or employees is, or becomes, excluded from, debarred by, or ineligible to participate in any governmental contracting program.

Publicity

Company prohibits the public disclosure of its name, logo, likeness, supplier relationships, products, parts, designs or any other non-public information in any press release, prospectus, offering memorandum, customer list, web site, including, without limitation, product displays at any trade show or supplier facility, without specific prior written authorization.

Supplier Diversity

Company is committed to the inclusion of diverse businesses within the sourcing process and the supply chain. Company expects all suppliers to support this commitment by deploying strategies and programs to increase sourcing opportunities for diverse businesses, where applicable.

Confidentiality

All Company suppliers are expected to respect Company's proprietary and confidential information and must maintain policies that enforce strict compliance with the confidentiality of such information.

Company Integrity Hotline

The Company Integrity Hotline is an impartial resource with whom suppliers may raise and address compliance concerns. The goal of this hotline is to address concerns quickly, fairly, and at the proper level in the organization. To contact the Company Integrity Hotline, please call (888) 696-9864.

Contact Us

For additional information regarding these expectations and requirements, please email us at supplier.support@mnk.com.