

## Supplier Code of Conduct

MCPL has a 'zero tolerance' policy when it comes to unethical business behaviour, such as bribery, corruption and forced labour. We expect all of our suppliers to adhere to similar standards and to conduct their business ethically.

As a supplier, you must comply with all applicable laws and regulations, the requirements set out in this MCPL Supplier Code of Conduct and your contractual obligations to us. This MCPL Supplier Code of Conduct defines the main principles underlying your business activities as one of our suppliers.

### **1. Human Rights:** As a supplier to MCPL, you shall

Respect the personal dignity, privacy and rights of each individual;

Refuse to make any person work against his or her will;

Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

### **2. Fair Labour Conditions:** As a supplier to MCPL, you shall

Ensure fair labour conditions;

Refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;

Respect the rights of employees to freely associate and bargain collectively;

Not tolerate or use child labour in any stage of your activities other than in accordance with all applicable laws and regulations;

Not use any forced labour, including but not limited to involuntary prison labour, victims of slavery and human trafficking and allow all employees the choice to leave their employment freely upon reasonable notice;

Compensate employees fairly and follow local wage regulations and / or collective agreements, and where these do not exist, compensate employees so at the minimum they can meet their basic needs;

Ensure that working hours, including overtime, do not exceed applicable legal requirements, and where such requirements do not exist, we recommend that working hours should be complied with maximum number of working hours as per applicable laws;

Ensure that employees are allowed at least one uninterrupted day off per week.

### **3. Health, Safety & Environmental Management:** As a supplier to MCPL, you shall

Provide a safe and healthy workplace for all of your employees and shall conduct your business in an environmentally sustainable way;

Formally appoint a competent person to manage health, safety and environmental programs and improvements;

Establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks;

Ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures.



**4. Materials Compliance & Conflict Minerals:** As a supplier to MCPL, we are Determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, suppliers shall ensure that the goods provided to MCPL are in compliance with requirements covered under the scope of all relevant regulations;

Implement a policy regarding conflict materials & minerals and exercise due diligence to investigate the source of these materials & minerals;

Respond in a timely manner to MCPL's requests for evidence of your compliance with these requirements.

**5. Business Ethics:** As a supplier to MCPL, you shall

Conduct your business in an ethical manner;

Refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including MCPL employees), government officials and any other party are in compliance with applicable anti-bribery laws;

Adhere to anti-trust and other competition laws;

Disclose to MCPL information regarding potential conflicts of interest relating to your activities as an MCPL supplier;

Disclosure of any financial interest an MCPL employee may hold in your business;

Protect all confidential information provided by MCPL and our respective business partners;

Respect intellectual property of others, including MCPL;

Adhere to international trade regulations and export control regulations.

**6. Secure business:** As a supplier to MCPL, you shall

Conduct your business in a secure manner;

Implement reasonable measures for minimizing exposure of MCPL to security threats such as terrorism, crime, pandemics and natural disasters;

When visiting or working at MCPL locations, follow MCPL's security procedures and report any security concerns to the appropriate MCPL channels.

**7. Procurement By Supplier:** As a supplier to MCPL, you shall

Procure goods and services in a responsible manner;

Select your own tier one suppliers providing goods or services directly or indirectly to MCPL based on them agreeing to adhere to standards comparable to those set forth in this MCPL Supplier Code of Conduct;

When working at MCPL locations, only subcontract work with prior consent from MCPL.

**MODISON**  
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**8. Inspections & Corrective Actions:** As a supplier to MCPL, you shall Ensure and demonstrate compliance with the MCPL Supplier Code of Conduct; Keep record of all relevant documentation, and provide to us supporting documentation upon request;

To verify your compliance, we reserve the right to audit and inspect your operations and facilities, at our own cost and upon reasonable notice, with or without support of a third party. If the results of such an audit or inspection cause us to be of the opinion that you do not comply with this MCPL Supplier Code of Conduct, you shall take necessary corrective actions in a timely manner, as directed by us. If you fail to comply with this MCPL Supplier Code of Conduct, then we may take action against you, including suspending or terminating your activities as one of our suppliers.

**9. Access to remedy:** As a supplier to MCPL, in the context of our business relationship, if you or your employees believe that the terms of this MCPL Supplier Code of Conduct are not adhered to, or that MCPL is not acting in accordance with its own MCPL Code of Conduct, then we encourage you to raise your concerns via the MCPL reporting channels.

MCPL thanks you for being part of our quest. Let us grow together!

Yours Sincerely,

  
Jay G. Modi  
Director