Supplier Code of Conduct

General
MCB[1] stands for an honest and responsible way of doing business. In that regard we expect our suppliers *(as our business partners)* to comply with the requirements as described in this Supplier Code of Conduct ("Code") which is based on the UN Global Compact. This Code sets out our principles and expectations as to how organisations, including its representatives, employees and affiliates, who supply goods and services to MCB ("Supplier"), are to conduct business with us. We have committed to our MCB Code of Conduct and expect our Suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards. We also expect our Suppliers to communicate this Code to their employees, subcontractors and representatives to ensure that they comply with this Code.

I. Business integrity

Compliance with legislation
Supplier shall comply with all applicable national and international laws, rules and regulations in the countries where they operate. This includes, but is not limited to the laws and regulations governing the following: environment, human rights and employment. MCB also expects its Suppliers to adhere to all generally accepted international standards which are stated herein. In case applicable law requirements are lower than the requirements as set forth in this Code, MCB expects the Supplier to comply with the higher standards.

Management System
Suppliers shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and MCB requirements related to the suppliers' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It shall also facilitate continual improvement.

Fair competition
MCB endorses the rules for the protection of a free market and open competition. Supplier shall conduct its business in accordance with all applicable competition laws and anti-trust legislation.

Anti-corruption and Anti-bribery
The Supplier shall not engage in or tolerate any form of corruption, extortion, embezzlement or bribery and shall comply with all applicable anticorruption and anti-bribery regulations, also including the UN Global Compact's principle 10 (Anti-corruption). Supplier will not offer or accept any benefits or other unlawful incentives to obtain any undue or improper advantage.

[1] In the context of this Code, MCB includes MCB International B.V. and all affiliated companies.

Favours and gifts
To a certain extent, it is acceptable in the world in which we operate for individual MCB employees to accept favours and gifts from business partners. However, in order to avoid any unwanted conflicts of interest, Supplier shall not offer to MCB employees any favours, gifts, services or inappropriate invitations, either for the employee himself or individuals or institutions in his immediate vicinity. An exception has been made for occasional gifts with a limited value. Offering a gift in the form of a payment of money is not permitted under any circumstances.

Anti-Money-Laundering
Supplier shall conduct its business in accordance with all applicable anti-money-laundering regulations.

Privacy and Intellectual Property
Supplier will safeguard and make only appropriate use of confidential information and ensures that all employees' and Supplier's privacy and valid intellectual property rights are protected. This includes, among others, implementing robust cybersecurity measures. Supplier must ensure that all personal data of employees, contractors and/or other third parties is processed in compliance with all applicable laws, including the General Data Protection Regulation (EU 2016/679).
The Supplier will only process personal data after having concluded a processing agreement with MCB. The Supplier will maintain a register of the processing activities it carries out on behalf of MCB and, if applicable, under joint processing responsibility.

II. Human rights and labour principles

General
MCB expects its Suppliers to respect internationally recognised human rights and labour principles. Supplier must support and respect the UN Global Compact's human rights principles (Principles 1 and 2) and the UN Global Compact's labour principles (Principles 3, 4, 5 & 6).

Non-discrimination and fair treatment
MCB stands for equal treatment of its employees and does not discriminate in any way. Suppliers shall not discriminate in hiring and employment practices such as applications for employment, promotions, rewards, access to training, benefits, wages termination or retirement. Illegitimate grounds for discrimination include but are not limited to: race, colour, gender, age, language, property, nationality or national origin, religion, ethnic or social origin, disability, pregnancy, trade union affiliation, political opinion or sexual orientation. Supplier will ensure that its employees are not threatened or harassed in any way. It is strictly forbidden to violate any person's dignity, verbally or physically.
Suppliers must promote a diverse and inclusive workplace, providing equal opportunities for all employees regardless of race, gender, age, religion, or disability. Discrimination and harassment in any form are strictly prohibited.

No forced labour
MCB does not tolerate slavery and forced or compulsory labour (including bonded labour and involuntary prisoner labour) in our supply chain.

No child labour
MCB does not tolerate child labour in our supply chain. Supplier must avoid any sort of child labour in its business operations and must observe the minimum age for permission to work according to the applicable regulations.

Minimum wages and working hours
Supplier shall comply with all applicable laws and regulations, including (but not limited to) those relating to minimum wages, working hours and overtime hours. Suppliers are expected to provide their employees with fair and competitive compensation and benefits.

Health & Safety
Supplier shall ensure a safe and healthy workplace or any other location where work is undertaken in compliance with all applicable laws and regulations, ensuring, at a minimum, reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation. Supplier must implement appropriate controls, safe procedures and protocols for providing appropriate protective equipment in compliance with all applicable laws and regulations. Supplier must take all appropriate measures to protect its employees from any health hazards and ensures that employees who work in a facility are carefully selected and properly trained.

Freedom of Association
Supplier shall recognise and respect the right of employees to freely associate, organise and bargain collectively, to establish or join labour unions and representative organisations, if they wish to do so.

III. Environment

Environmental Policy
MCB works to continuously assess and reduce our environmental impact. We aim to prevent environmental damage and minimise our use of energy and resources. Suppliers must comply with all environmental laws and regulations applicable to the workplace, the products produced, and the methods of manufacture. Additionally, Suppliers must not use materials that are considered harmful to the environment, but should encourage the use of processes and materials that support sustainability of the environment throughout their supply chain. We expect our Suppliers to avoid pollution and prevent the wasteful use of natural resources.
MCB encourages our suppliers to take measures to reduce their carbon footprint. This includes using renewable energy sources, optimizing energy efficiency, and minimizing waste. MCB also suggests suppliers commitment to ensure that materials are sourced sustainably, avoiding deforestation and other harmful environmental impacts.
Supplier must respect and support the UN Global Compact's environment principles (principles 7, 8 and 9). Suppliers are expected to establish and maintain a suitable environmental management system (e.g. in accordance with ISO 14001 or national equivalent).

Supplier shall comply with all applicable laws and regulations (e.g. all import, export, sanctions and trade compliance regulations and restriction such as but not limited to REACH, RoHS and EPR). Supplier agrees, upon request, to provide MCB with any documentation or other information to show or ascertain compliance with applicable laws and regulations. Supplier will also provide all reasonable cooperation necessary for MCB to comply with its (EU) legal and/or governmental obligations.

Conflict Minerals
Supplier shall comply to all applicable conflict minerals laws and regulations. Additionally, Suppliers must establish a policy to reasonably assure that conflict materials (including tin, tungsten, tantalum and gold) which may be contained in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses.

IV. Miscellaneous

Suppliers and their supply chains

Suppliers are required to disclose their supply chains and ensure that all sub-suppliers comply with the same ethical standards outlined in this Code of Conduct. Regular audits and assessments should be conducted to verify compliance.

Audit and non-compliance with this Code

Upon request, the Supplier shall provide MCB with all necessary and/or requested documents that demonstrates compliance with this Code. Supplier shall address any violations of this Code or equivalent standards that come to their knowledge and shall take appropriate actions. MCB reserves all rights to ensure the Supplier's compliance with this Code through monitoring, independent third party verification and audit. MCB shall be entitled to terminate individual orders and/or the contractual relationship with the Supplier in case the Supplier and/or any third party involved by the Supplier is in breach with any of the provisions of this Code and does not effectively cure such breach within a reasonable time set by MCB.

Suppliers can be subject to regular audits and assessments to ensure compliance with this Code of Conduct. MCB appreciates full cooperation during these audits and the implementation of any necessary corrective actions.

Whistleblowers protection

Suppliers must establish a whistleblower policy that allows employees to report unethical or illegal activities confidentially and without fear of retaliation. Reports should be investigated promptly and thoroughly.

Indemnification

Supplier shall indemnify and hold MCB and its officers, employees, successors and assigns harmless from and against all costs, expenses (including, without limitation attorney's and accountant's fees and all disbursements), losses, liabilities or obligations arising at any time out of any breach of, or failure to perform any obligation of Supplier and/or any third party directly/indirectly involved by the Supplier, under this Code.

Declaration to be signed by Supplier:

Herewith I confirm that I have received the MCB Supplier Code of Conduct and commit to comply with it in doing business with MCB.

Company: .....
(Supplier's Company Stamp)

Name: .....

Title: .....

Date: .....

Signature: .....