

# MSCP Supplier Code of Conduct

## Introduction

MSCP Heat Management Solutions (MSCP) is committed to conducting business in an ethical, legal, environmentally, and socially responsible manner. It is MSCP's directive to work with suppliers, consultants, business partners and other third parties who share this commitment.

This Supplier Code of Conduct describes the principles and standards to which we expect our suppliers to adhere and is communicated to provide our suppliers with a clear understanding of how they can meet MSCP's standards. These principles are based on the requirements of ISO 26000 and the UN Global Compact (UNGC), focusing on human rights, labor practices, environmental stewardship, and anti-corruption measures.

This Supplier Code sets ethical conduct standards for all suppliers to meet when doing business with or on behalf of MSCP. Suppliers must implement these requirements in a manner that is proportional to the size and scale of the goods and services they provide.

## Compliance with Laws and Ethical Standards

Suppliers are required to act in accordance with all laws and regulations relevant to their business in the jurisdictions in which they operate.

Suppliers are encouraged to support the principles of the United Nations Global Compact and the International Labour Organization Core Standards and Declaration of Fundamental Principles of Rights at Work.

## Human Rights

### Forced Labour

Suppliers must not use forced, bonded, or indentured labor, involuntary prison labor, slavery, or trafficking of persons. All work must be voluntary, and workers must be free to leave upon reasonable notice. Workers must not be required, as a condition of employment, to make a deposit of, or surrender any government-issued identification, passports, work permits or any other documents necessary for free movement and termination of employment.

## Child Labour

Suppliers must comply with local minimum working age laws and the core ILO standards, including ILO Convention 138. and not employ child labor. MSCP is committed to the elimination of the “worst forms of child labour” and Suppliers are strictly prohibited from using child labour in accordance with ILO Convention 182. Exceptions are made for legitimate workplace apprenticeship programs compliant with all laws and regulations.

## Working Hours and Compensation

Suppliers must comply with all applicable local laws on working hours, overtime, and compensation. Employees must be paid at least the minimum wage required by law and provided with all legally mandated benefits.

Suppliers should provide all workers with clear and understandable employment documentation, outlining worker terms and conditions and their rights and responsibilities.

## Freedom of Association and Collective Bargaining

Suppliers must respect the rights of workers to freely associate, join or not join labor unions, seek representation, and join workers’ councils. Suppliers must recognize and negotiate with legally recognized employee representative organizations. Suppliers must comply with local law regarding the activities of trade unions and work councils and their organizational activities.

## Diversity and Inclusion

Suppliers must promote an inclusive work environment free of discrimination and harassment. Employment decisions must be based on merit and business needs, regardless of race, color, age, gender, sexual orientation, ethnicity, disability, religion, or any other protected status.

Suppliers must not engage in physical, mental, verbal, sexual or any other abuse, inhumane or degrading treatment, corporal punishment, or any form of harassment.

## Health and Safety

Suppliers must provide a safe, clean, and healthy working environment, following all relevant health and safety laws and regulations. Suppliers should ensure that actual and potential risks to worker health and safety are identified, assessed, and eliminated or managed to mitigate their impacts and ensure preparedness. This includes implementing procedures to prevent accidents and injuries and providing necessary training and protective equipment.

Suppliers should strive for continuous improvement in safety performance and regularly review and update their safety programs and practices to ensure compliance with law and industry standards.

## Environment and Climate Change

Suppliers must conduct their operations with minimal environmental impact, respect applicable environmental laws and regulations and adopt procedures, contingency plans, emergency response measures and management systems, as appropriate for their business. Suppliers should provide employees with relevant environmental training.

Suppliers must comply with all applicable environmental laws and regulations. Suppliers are encouraged to minimize their environmental impact by adopting practices that reduce waste, emissions, and energy consumption, and by promoting sustainable resource use.

Suppliers are encouraged to seek opportunities for biodiversity conservation, including rational use of natural resources required for their operations and the promotion of conserving, recycling, and reusing materials.

## Supporting Indigenous Peoples and Local Communities

Suppliers must respect the rights and cultures of Indigenous peoples and local communities. This includes engaging in meaningful consultation and seeking consent for activities affecting their lands, resources, and rights.

Suppliers are encouraged to identify, adopt, and integrate diverse suppliers into their supply chain so their supplier base reflects the diversity of society.

## Confidentiality and Data Protection

Suppliers must protect the confidentiality of all data provided by MSCP and ensure that any data collected, stored, processed, or transmitted is done so securely and in compliance with applicable data protection laws.

## Trade Regulation

Suppliers must comply with all applicable trade laws and regulations, including export and import controls, sanctions, and embargoes. This ensures that goods and services are traded legally and ethically.

## Anti-Bribery and Anti-Corruption

Suppliers must adhere to the highest standards of integrity and must not engage in any form of bribery or corruption. Suppliers must not engage, directly or indirectly, in corruption, fraud, bribery, kickbacks, money laundering, embezzlement, extortion or any other form of corruption.

Suppliers may not, directly or indirectly, give or receive improper business advantage or anything of value in exchange for preferential treatment.

Suppliers must maintain financial records and reports as required by applicable laws and regulations.

## Conflicts of Interest

Suppliers must avoid any conflicts of interest that may affect their business relationship with MSCP. Suppliers must not provide direct or indirect improper personal benefits to MSCP employees, members of their families or persons with whom they share a close personal relationship. Some gifts and entertainment (i.e., a business courtesy such as a meal or an event that is attended with an MSCP employee) may be offered provided they are not of substantial value, cannot reasonably be interpreted as an improper payment and can be disclosed publicly without any embarrassment to MSCP.

Any actual or potential conflict of interest must be disclosed to MSCP immediately.

## Competition

Suppliers must compete fairly and comply with all applicable antitrust and competition laws. Suppliers must not engage in any anti-competitive practices such as price fixing, market allocation, or bid rigging.

## Monitoring and Oversight

### Monitoring and Record-Keeping

Suppliers must maintain accurate records of all matters related to their compliance with this Code of Conduct.

## Reporting Contraventions of the Code

The Supplier is expected to implement corrective actions immediately to address any contraventions of this Supplier Code.

Anyone who believes that a Supplier has engaged in illegal, unethical, or otherwise improper conduct, or conducted any other activity in violation of this Supplier Code is encouraged to speak up and report such conduct.

Suppliers must not retaliate against any person for reporting, in good faith, contraventions of this Supplier Code, or for filing a complaint, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by a government enforcement agency.

## Conclusion

By accepting this Supplier Code of Conduct, suppliers commit to upholding the principles and standards outlined herein. MSCP reserves the right to terminate its relationship with any supplier who fails to comply with this Code of Conduct.

For questions or concerns regarding this Code of Conduct, please contact the MSCP compliance team at [compliance@mscltd.ca](mailto:compliance@mscltd.ca).