# Supplier Code of Conduct

**Purpose**

A central aim of the MSK Group (”MSK”) is to be a genuine, straightforward and honest partner to its employees, customers and stakeholders. We want to increase economic well-being in society and reduce environmental impacts through our operations. We support global agreements on human rights, labor, the environment, and anti-corruption.

To achieve the positive goals of our operations, we follow principles of responsible operations, which we also require of our suppliers. The purpose of these principles is to make sure that we are developing our operations with suppliers who have the same operating principles and goals that we have.

**We insist that our suppliers follow at least the principles of this Code of Conduct in their business operations.** This is a requirement and starting point for engaging in business cooperation with us.

**Applicability**

The requirement covers the MSK entirely and applies to all suppliers regardless of products and/or services.

Employees of suppliers must be people working for the supplier. They may be the supplier’s own employees, subcontracting, or in a temporary work relationship. MSK requires that its suppliers check and verify that its own suppliers follow principles of responsibility.

**Conformance**

MSK monitors the responsibility work of its suppliers. Suppliers may be asked to provide a written response to questions concerning their social and environmental responsibility. MSK has the right to review or audit a supplier’s responsibility operations or have this performed by a third party of its choice. The supplier agrees to cooperate during reviews or auditing of responsibility. For more information on the values, operating principles and responsibility of MSK, visit https://mskeurope.com/sustainability.

**Overview**

Suppliers shall comply with legislation and agreements concerning their operations.

**Labor and human rights**

Suppliers do not use child labor in their operations. Suppliers do not use employees younger than 15 years of age, or younger than 18 years of age when performing hazardous work.

Suppliers must not use any forced, involuntary, or indentured labor, nor should threats of violence, physical punishment, confinement or other forms of physical, sexual, psychological or verbal harassment, abuse or control be used as a method of discipline, coercion or detention. Work is performed on a voluntary basis. The supplier does not confiscate employees’ personal documents or possessions in any way to compel them to work.

The supplier pays at least statutory wages for work performed and complies with legislation concerning working hours.

Employees have the right to organize or not organize themselves into a trade union and pursue common interests as an association.

Employees shall not be discriminated against based on gender, age, ethnicity, marital status, sexual orientation, religion, political views or state of health.

**Health and safety**
Suppliers provide safe and healthy working conditions and takes the necessary steps to prevent accidents at work. Accidents at work are documented and measured in the necessary manner.

Accidents at work are studied in order to learn from them and to prevent them from repeating. Suppliers make sure that all employees are provided with orientation and the work includes the necessary protective equipment without charge.

**Data Protection and Data Security**
Suppliers must comply with all applicable data protection and privacy laws and regulations. Suppliers must implement appropriate technical and organizational measures to protect personal and business data against unauthorized access, use, disclosure, alteration, loss, or destruction.

**Anti-corruption**
Suppliers do not accept corruption or bribes in any form. Suppliers act against corruption in all forms, including, but not limited to, extortion, fraud, money laundering and cash payments.

**Financial Responsibility**
Suppliers must maintain complete, accurate, and transparent financial and business records in accordance with applicable laws and generally accepted accounting principles. False, misleading, or intentionally incomplete entries in business records are prohibited.

**Environment and Sustainability**
Our suppliers share a crucial responsibility for protecting the environment and climate. We expect all business partners to minimize the ecological impact of their operations and to actively support sustainable development. The following principles must be observed:

1. **Compliance with Environmental Regulations**
   Suppliers must comply with all applicable environmental laws, regulations, and standards in the countries in which they operate.

2. **Resource Conservation and Energy Efficiency**
   The use of natural resources (e.g., raw materials, energy, water) should be efficient, economical, and as environmentally friendly as possible. The use of renewable energy sources is expressly encouraged.

3. **Reduction and Avoidance of Environmental Impact**
   Emissions into air, water, soil and noise emissions, as well as waste and wastewater, must be minimized. Measures to prevent, recycle, and dispose of waste in an environmentally sound manner must be implemented. Suppliers must manage chemicals and hazardous substances responsibly and in compliance with all applicable laws and regulations to prevent and minimize environmental risks and their impacts.

4. **Sustainable Packaging and Logistics**
   Suppliers should avoid unnecessary packaging and use environmentally friendly, recyclable, or reusable materials. Transport routes should be optimized to reduce emissions.

5. **Climate Protection**
   Suppliers are encouraged to track their greenhouse gas emissions, implement measures to reduce them continuously, and define long-term climate goals.

6. **Transparency and Continuous Improvement**
   Suppliers should set environmental targets, document progress, and be willing to disclose relevant environmental information upon request. Sustainability is to be understood as a process of continuous improvement.

7. **Responsibility Along the Supply Chain**
   Suppliers are also responsible for the environmental conduct of their own subcontractors and business partners and are encouraged to assess and promote sustainable practices throughout their supply chain.

**Conflict minerals**

The term *conflict minerals* refer to minerals extracted from areas where there are widespread internal conflicts and where the extraction of minerals may contribute to the continuation of the conflict and violation of human rights or be a source of their funding. Suppliers do not knowingly acquire conflict minerals or their derivatives from conflict areas unless they have been certified as “conflict free”.

**Fair Competition and Antitrust Laws**

Suppliers must comply with all applicable fair competition and antitrust laws and regulations. These laws are designed to promote free and open markets and protect consumers and businesses from anti-competitive practices.

Specifically, Suppliers shall:

- Not engage in collusive or anti-competitive behavior, including price fixing, market allocation, bid rigging, or abuse of dominant market position.

- Avoid exchanging sensitive commercial information with competitors.

- Compete fairly and honestly in all dealings, including tenders and negotiations.

We reserve the right to audit and review a supplier's practices regarding fair competition compliance.

**Conflicts of Interest**

Suppliers must avoid all conflicts of interest or situations that create the appearance of a conflict of interest in their dealings with MSK.

A conflict of interest arises when a supplier's personal interests (or those of their employees, officers, or representatives) interfere — or appear to interfere — with their ability to act in the best interest of MSK.

Suppliers are expected to have policies and procedures in place to identify, disclose, and manage conflicts of interest.

**Protection Against Retaliation**

Suppliers should provide employees and other stakeholders with a confidential and, where possible, anonymous mechanism for reporting suspected misconduct or violations. In addition, suspected violations of this Supplier Code of Conduct may be reported confidentially—and, where needed, anonymously—through MSK's public Whistleblow channel and related guidelines available on MSK's website. People raising concerns in good faith, whether through the supplier's own channels or directly to MSK, must be strictly protected against retaliation, discrimination, dismissal, or any other disadvantage.

**Export Controls and Economic Sanctions**

Suppliers must comply with all applicable export control, trade, and economic sanctions laws and regulations in the countries where they operate and conduct business with MSK.

This includes, but is not limited to:

- Complying with restrictions related to the transfer, export, re-export, or disclosure of products, services, software, or technology to individuals, entities, or countries subject to applicable sanctions or embargoes.

- Promptly notify MSK of any potential violations or issues that may affect compliance with applicable laws in this area.

Suppliers must ensure that their operations, transactions, and partnerships do not expose MSK to risk of legal liability or reputational harm related to export control or sanctions violations.

**Confidentiality and Intellectual Property Rights**

Suppliers must protect all confidential and proprietary information received from or on behalf of MSK, and respect intellectual property rights at all times. Maintain the confidentiality of all non-public, sensitive, or proprietary information received through the course of their engagement with MSK and not disclose confidential information to any third party without prior written consent from MSK.

Suppliers should implement appropriate safeguards (technical, physical, and organizational) to prevent unauthorized access, use, disclosure, or loss of such information.

**Supplier Evaluation**

Our suppliers agree to be assessed, audits and inspections to verify compliance with Supplier Code of Conduct and the terms of the contract. Violations and evidence of noncompliance leads to a range of corrective and potentially disciplinary actions, including termination of the supplier relationship if warranted based on the severity of the finding. Preference, however, is given to engaging with suppliers and working collaboratively to address areas of concern and effect real change.

These assessments may be conducted by employees of the MSK or by an independent third party commissioned by the MSK.

**Validity**

We will evaluate this Supplier Code of Conduct annually and you will find the latest approved document in our website, https://mskeurope.com/sustainability. In case of major changes, we will inform our Suppliers commonly.

The Supplier Code of Conduct is approved by MSK Group's Management Team on 24.11.2026.