



MPP PURCHASING POLICIES

MPP Supplier Code of Conduct

MPP is committed to ensuring that working conditions in MPP's supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible. MPP's suppliers ("Suppliers") commit, in all of their activities, to operate in full compliance with the laws, rules, and regulations of the countries in which they operate. This Supplier Code of Conduct ("Code") draws upon internationally recognized standards, in order to advance social and environmental responsibility.

MPP requires that Suppliers implement this Code. MPP may visit and/or have external monitors visit Supplier facilities to assess compliance with this Code.

Labor and Human Rights

Suppliers must uphold the human rights of workers, and treat them with dignity and respect as understood by the international community.

Antidiscrimination

Suppliers shall not discriminate against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination.

Fair Treatment

Suppliers shall commit to a workplace free of harassment. Suppliers shall not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company-provided facilities. Suppliers shall prohibit harassment and unlawful discrimination in the workplace.

Prevention of Involuntary Labor and Human Trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Suppliers shall ensure that third-party agencies providing workers are compliant with the provisions of the Code.

Prevention of Underage (Child) Labor



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Suppliers will not employ individuals in violation of local mandatory school age or under the legal employment age in each country where they operate.

Working Hours

Except in emergency or unusual situations, a reasonable effort will be made for a work week to not exceed 60 hours, including overtime, and for workers to take at least one day off every seven days. Working overtime should be voluntary by employees who willingly bid to work it except on infrequent occurrences when Management has the need to require overtime work. Under no circumstances shall work weeks exceed the maximum permitted under applicable laws and regulations.

Wages and Benefits

Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, workers shall be compensated for overtime hours at the premium rate required by applicable laws and regulations. Suppliers shall not use deductions from wages as a disciplinary measure. Suppliers shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. Suppliers shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

Freedom of Association

Suppliers must respect the right of workers to associate freely with, form, and join workers' organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. Suppliers shall not discriminate with respect to employment based on union membership and, in particular, shall not make employment subject to the condition that the workers relinquish union membership or agree not to join a union; or cause the dismissal of or otherwise prejudice a worker by reason of union membership or participation in union activities outside working hours (or within working hours if the Supplier has consented to such activities or if required by applicable laws or regulations).

Health and Safety

MPP recognizes that integrating sound health and safety management practices into all aspects of business is essential to maintain high morale and produce innovative products. Suppliers shall commit to creating safe working conditions and a healthy work environment for all of their workers.

Occupational Injury Prevention

Suppliers shall eliminate physical hazards where practicable. Where physical hazards cannot be eliminated, Suppliers shall provide appropriate engineering controls such as physical guards, interlocks, and barriers. Where appropriate engineering controls are not feasible Suppliers shall establish appropriate administrative controls such as safe work procedures. In all cases, Suppliers



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shall provide workers with appropriate personal protective equipment. Workers shall not be disciplined or need to fear reprisal of management for raising safety concerns and management will adequately address all legitimate concerns.

Occupational Safety Procedures and Systems

Suppliers shall establish procedures and systems to manage and report occupational injury and illness. Such procedures and systems shall encourage worker reporting, classify and record injury and illness cases, investigate cases and implement corrective actions to eliminate their causes, provide necessary medical treatment, and facilitate the workers' return to work.

Emergency Prevention, Preparedness, and Response

Suppliers shall anticipate, identify, and assess emergency situations and events and minimize their impact by implementing emergency plans and response procedures, including emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

Ergonomics

Suppliers shall identify and control worker exposure to physically demanding tasks, including heavy lifting and highly repetitive tasks.

Dormitory and Dining

Suppliers shall provide workers with clean toilet facilities, access to potable water, and sanitary food preparation and storage facilities. Worker dormitories provided by the Supplier or a third-party agency shall be clean and safe and provide adequate emergency egress, adequate heat and ventilation, reasonable personal space, and reasonable entry and exit privileges.

Health and Safety Communication

In order to foster a safe work environment, Suppliers shall provide workers with appropriate workplace health and safety information and training, including written health and safety information and warnings, in the primary language of the workers.

Worker Health and Safety Committees

Suppliers are encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input regarding health and safety issues in the workplace.

Environmental Impact



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Suppliers shall commit to reducing the environmental impact of their designs, manufacturing processes, and waste emissions. Suppliers must comply with any applicable laws and regulations prohibiting or restricting the use or handling of specific substances. To ensure safe handling, movement, storage, recycling, reuse, and disposal, Suppliers shall identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal.

Solid Waste Management

Suppliers shall manage and dispose of non-hazardous solid waste generated from operations as required by applicable laws and regulations.

Wastewater and Storm Water Management

Suppliers shall monitor, control, and treat wastewater generated from operations before discharge as required by applicable laws and regulations. Suppliers shall take appropriate precautions to prevent contamination of storm water runoff from their facilities.

Air Emissions Management

Suppliers shall characterize, monitor, control, and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations, as required by applicable laws and regulations, before discharge.

Environmental Permits and Reporting

Suppliers must obtain, maintain, and keep current all required environmental permits (for example, discharge monitoring) and registrations and follow the operational and reporting requirements of such permits.

Pollution Prevention and Resource Reduction

Suppliers must endeavor to reduce or eliminate solid waste, wastewater, and air emissions, including energy-related indirect air emissions, by implementing appropriate conservation measures in their production, maintenance, and facilities processes, and by recycling, reusing, or substituting materials.

Ethics

Suppliers must be committed to high standards of ethical conduct when dealing with workers, suppliers, and customers. This strictly prohibits the following:

- Dishonest or Unethical Behavior on Business Transaction
- Harassment or Discrimination
- Threats or Violence



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- Conflicts of Interest
- Safety or Environmental Violations
- Theft, Fraud, or Accounting Irregularities
- Any Other Serious Legal or Ethical Offenses

If anyone observes a MPP employee exhibiting any of the above behaviors, please report these observations to an MPP Human Resources Manager, the MPP Director of Purchasing, or any member of MPP Senior Management.

Business Integrity

Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Suppliers shall not violate the Foreign Corrupt Practices Act (FCPA), any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate, and shall not engage in corruption, extortion, or embezzlement in any form. Suppliers shall not offer or accept bribes or other means to obtain an undue or improper advantage. Suppliers must uphold fair business standards in advertising, sales, and competition.

Disclosure of Information

Suppliers must accurately record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices.

Complaints and Grievances

Suppliers shall provide a complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations.

Community Engagement

Suppliers are encouraged to engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.

Protection of Intellectual Property

Suppliers must respect intellectual property rights and safeguard customer information; transfer of technology and know-how must be done in a manner that protects intellectual property rights.

Company Statement

A corporate social and environmental responsibility statement affirming the Supplier's commitment to compliance and continual improvement is to be posted in the primary local language at all of the Supplier's worksites.

Documentation and Records



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Supplier shall have processes to identify, monitor, and understand applicable laws and regulations and the additional requirements imposed by this Code. Supplier shall have processes for creation of documents and records to ensure regulatory compliance and conformity to this Code, with appropriate confidentiality measures to protect privacy.

Training and Communication

Suppliers shall have programs in place for training managers and workers to implement their policies and procedures and to fulfill improvement objectives.

Suppliers shall have a process for communicating clear and accurate information about their performance, practices, and expectations to its workers, suppliers and customers.

Worker Feedback

Suppliers shall have an ongoing process to obtain feedback on processes and practices related to this Code and to foster continuous improvement.

Corrective Action Process

Supplier shall have a process for timely correction of any deficiencies identified by an internal or external audit, assessment, inspection, investigation, or review.

Security

Suppliers must implement measures to secure our international supply chain and comply with all applicable customs and anti-terrorism laws.

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0	11/08/2016	Document Created	S. Kahn