



BUSINESS ETHICS

THE MSA WAY

One Mission. One Passion. One Purpose.

Introduction

MSA's mission, which has gone unchanged for more than a century, is to see to it that men and women may work in safety and that they, their families, and their communities may live in health throughout the world. This commitment starts with our Mission and Values which encompass Integrity, Customer Focus, Speed & Agility, Innovation and Change, Diversity and Inclusion, Teamwork and Engagement.

Integrity has been at the foundation of MSA since 1914, when John T. Ryan and George Deike insisted there was a better way to protect workers. While the Company has evolved and grown over the years, our commitment to integrity has only gotten stronger. In fact, this commitment is one of the fundamental reasons for our continued prosperity and, more importantly, is formally represented as the Company's foundation value.

To achieve our mission and uphold our values, we must conduct business **The MSA Way** and act ethically and responsibly in all that we do. This means we must always stay focused on operating our business with unwavering integrity – the foundation of our values system. Integrity, simply put, is doing the right thing, in the right way, everyday, regardless of the business consequence. By conveying our values in a meaningful and actionable manner, we help our employees, and our ecosystem of business partners, keep business ethics at the forefront of all of their business dealings.



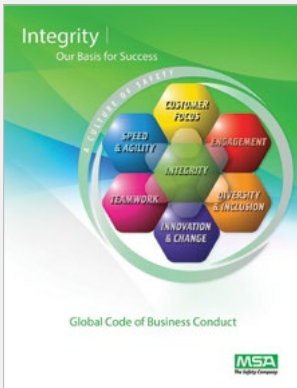
Business Ethics at MSA – Program Overview

Program Oversight

MSA maintains a comprehensive global business ethics and legal compliance program (the “business ethics program”). The MSA business ethics program is led by the Company's Chief Legal Officer, who also serves as the Company's Chief Compliance Officer. The Chief Legal Officer also provides regular updates to the CEO and to the Audit Committee of the Board of Directors. The Audit Committee has been delegated oversight responsibility for ethics and legal compliance matters by the Board.

At MSA, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. To further this commitment, MSA's global business ethics program is designed to promote a culture that encourages ethical conduct and a commitment to comply with our Global Code of Business Conduct, Company policies and all applicable laws.

In addition to oversight from our Board of Directors and active leadership by our Executive Leadership Team, we also partner with key functional areas to deploy important elements of our program, including Internal Audit, Human Resources and other functional areas of the business to create a culture of integrity.



Global Code of Business Conduct

[MSA's Code](#) is the overarching document that sets forth our core obligations and requirements for compliance with our ethical standards and the law, along with examples, guidance, and resources to assist employees in understanding their obligations and to guide in ethical decision-making. All MSA employees throughout the world are required to follow the Code in all MSA business dealings, without exception. While MSA's Code and policies are in place to prevent and detect conduct, in certain instances, the Code is supplemented by more detailed Company policies that further define rules and responsibilities on specific topics.

Supplier Code of Conduct (Supplier Code)

MSA's [Supplier Code of Conduct](#) sets forth MSA's minimum expectations for supplier conduct for business ethics and integrity, safety, human rights and labor laws, environmental practices, confidential information, and other practices. To bring our Supplier Code to life, MSA leverages a supplier survey that is performed with all of our suppliers. All suppliers must successfully complete the survey before MSA will conduct business with them. This survey includes key topics such as environmental sustainability, ethical sourcing (conflict minerals), workplace safety conditions, human rights and compliance with all global anti-bribery laws. Additionally, certain key suppliers to MSA (involved in high-risk projects, high spending, etc.) are also subject to an ISO 9001 audit as a condition of doing business with the Company.



Global Anti-Bribery Compliance

MSA conducts business on a global scale. This global reach introduces a number of legal complexities, including compliance with global anti-bribery/anti-corruption laws. Such laws can extend to employees and operations, wherever located, and the Company's compliance with these laws is of the utmost importance. Accordingly, MSA maintains a formal anti-bribery compliance program governed by our Code and a specific anti-bribery compliance policy. Our [policy](#) is available on our website. All employees are required to read, understand and follow the Code and our anti-bribery policy.



Pursuant to our anti-bribery policy, the Company maintains several processes and procedures to facilitate compliance with these laws. Three important examples include the following:

1. MSA maintains a formal anti-bribery training program through which targeted employees receive a blend of periodic on-line and live training as well as written guidance materials and a detailed anti-bribery compliance resource guide. Importantly, these training and guidance materials (and our anti-bribery policy) are available to employees in their local language, to ensure a full understanding.
2. The Company maintains a formal business partner due diligence process through which all third parties to be engaged by the Company in connection with the sale of our products or services must successfully complete a risk-based due diligence procedure. Business partners are also engaged under written agreements including detailed anti-bribery compliance covenants.
3. Our internal audit function deploys anti-bribery audit procedures as part of its ongoing audit work.

Global Trade Compliance Program

MSA is committed to complying with all applicable local and international trade laws, including but not limited to, sanctions regulations, country embargoes and other trade restrictions. A number of U.S. laws govern the way we conduct certain transactions with foreign countries and specific parties. These laws apply to U.S. operations, U.S. persons (regardless of location) and products manufactured around the world using U.S.-origin parts or technology. MSA's Trade Compliance program has export control processes, technologies, and services in place to control our exports and acquire export licenses. The program includes written policies and procedures and resources including training, work instructions and dedicated personnel to administer this program.

Data Privacy Program

MSA deploys a cross-functional Global Privacy Working Group led by our Law Department and – in certain locations, depending on local law – a Data Protection Officer to manage the Company's privacy obligations. The Global Privacy Working Group evaluates emerging privacy regulations and risks (e.g., new transactions, regional changes, resource constraints, major new processing activities), organizes global trainings, ensures appropriate and timely management of privacy issues, and facilitates the use of technologies and platforms to assist with global privacy compliance obligations. MSA receives and generates certain personal data in the course of its business operations. Personal data, also referred to as personal information, is broadly defined as any information that identifies or relates to a natural person. Personal information can come from any number of sources, including employment records and customer information. MSA is committed to processing all personal information in a secure manner and in accordance with applicable law, and the Company has designed specific policies and procedures for handling such data. For more information about how MSA handles personal information, including our process for making data subject requests, please visit our [Privacy Policy](#).



Antitrust and Competition Law Compliance Program

MSA expects all employees to conduct business in a manner that adheres to antitrust and competition laws of each location in which MSA does business. U.S. antitrust laws, as well as similar laws and regulations through the world, are intended to promote fair competition. MSA's Antitrust and Competition Law Compliance Policy supports this program along with the Antitrust and Competition Resource Guide.

Training, Reporting Obligations and Business Ethics Resources

MSA offers a variety of resources to assist employees in asking questions, voicing concerns, or reporting potentially unethical or unlawful conduct. MSA believes strongly in open lines of communication for all employees, supervisors, and managers; for that reason, employees seeking advice on ethics-related issues or reporting potential violations are encouraged to speak first to their supervisor. For situations where employees are unable or uncomfortable approaching their supervisor or manager, there are several alternative resources to ask questions, seek guidance, speak up or raise concerns about conduct that may violate the Code, Company policy or the law. Examples of other resources include our Human Resources Team, our Law Department, and the office of our Chief Compliance Officer. Lastly, in instances where employees are not comfortable directly approaching the Company, we maintain a confidential, anonymous helpline referred to as the MSA Ethics Guideline.



MSA Ethics Guideline

The MSA Ethics Guideline is a telephone, mobile and internet resource available to ask questions or report concerns 24 hours a day, seven days a week. Reporters can access the Ethics Guideline using a secure, third-party managed website, a toll-free telephone number, or a mobile intake form via a QR code. The toll-free number is answered by trained specialists speaking the local language, and the internet and mobile tools are available in our local languages. When contacting the Ethics Guideline, reporters have the option to provide their name or remain anonymous. Further, should a reporter wish to follow up on a report, the Ethics Guideline allows for anonymous written interaction between the Company and an anonymous reporter. All reports to the Ethics Guideline are managed

under the direction of the CCO who oversees the review process for each matter. The CCO ensures that all matters are reviewed by appropriate personnel (such as Legal, Compliance, Internal Audit, Human Resources, Information Technology, or other functional leaders), and that each matter is appropriately reviewed and addressed. Each matter is reviewed promptly, with sensitivity and discretion, and the Company maintains formal processes to provide for the confidentiality of each person who contacts the Ethics Guideline. Every reporter who chooses to provide their name or contact information when contacting the Ethics Guideline will be contacted by the Company to discuss their concerns.

Our Policy: No Retaliation

Regardless of the method our employees choose to report their concerns or raise their questions, MSA will not under any circumstances, allow retaliation against them. Pursuant to our Policy, any employee who attempts to retaliate against someone for raising concerns will face disciplinary action, up to and including termination of employment. These expectations are clearly communicated in our Code and through our ongoing training activities.



Business Ethics Training

As part of our global business ethics program, the Company maintains an ongoing training program to ensure that employees are regularly educated on key ethics and compliance risks. Training is deployed through an annual calendar, including topics selected by our Chief Compliance Officer as a result of ongoing risk assessment activities. As a baseline, employees receive annual Code training, and the topics in the training vary year-to-year. Beyond that training, targeted compliance training is deployed on a variety of specific topics, ensuring the right content is delivered to the employees who need to receive it. The training program includes a blend of live and self-paced web-based training in addition to a variety of other resources.

Business Ethics Intranet Site

Our Business Ethics intranet site is our self-service portal providing on-demand access to our employees for business ethics program information, including the Code, Company policies, online training, third party due diligence, guidance materials and speaking up resources. This site also includes our published quarterly newsletter Integrity-Matters. In each issue of our newsletter, we provide employees with important information related to key business ethics topics, examples of how those topics may apply to MSA, and reminders about Company resources for seeking guidance and reporting concerns.