

GLOBAL POLICY

Anti-Bribery / Anti-Corruption Policy

Effective Date:

June 15, 2023

Supersedes:

June 1, 2020

Approved by:


Nish Vartanian
Chairman and CEO

OBJECTIVE

MSA is committed to the highest level of ethical behavior and legal compliance in all business dealings. Accordingly, MSA and its employees and business partners will conduct business in a manner that adheres to all applicable laws, regulations, and Company policies and procedures governing bribery and corruption (“anti-corruption laws”), in all countries and territories in which MSA conducts business. As used in this Policy, “MSA” or “Company” means MSA Safety Incorporated and its affiliate companies.

OVERVIEW

1. MSA will not tolerate or participate in any form of bribery. Neither we nor outside parties acting on our behalf (distributors, representatives, agents, resellers, etc.) will bribe another party to obtain any type of benefit. Similarly, we will not accept bribes or be used by any other party to facilitate bribery.
2. Anti-corruption laws define bribery as promising, offering or paying “anything of value” in exchange for an improper business advantage. The term “anything of value” is very broadly interpreted and means more than cash. For example, it also includes cash equivalents such as gift cards or shopping cards, it extends to gifts of tangible property such as electronics or jewelry, and it includes various other items such as loans, services, stock certificates, airline tickets, paid vacations, lavish meals, promises of future employment, and much more.
3. While our prohibition against bribery covers dealings with all third parties, our interactions with government officials outside of the United States present heightened risk and must receive special attention. One of the most aggressively enforced anti-corruption laws is the United States Foreign Corrupt Practices Act (“FCPA”), which specifically prohibits bribery of government officials in countries outside of the United States.
4. The FCPA broadly interprets the term “government official” to include elected officials, government employees, employees of public international organizations such as the United Nations, and other persons acting on behalf of government organizations. Importantly, the term “government official” also includes employees of government owned or controlled

companies. Often times it is difficult to identify a government official, requiring employees to exercise great care when interacting with customers and other third parties outside of the United States. For this reason, certain requirements explained in this Policy below are intended to address the risks that can arise in dealing with a government official.

5. In addition to the FCPA, virtually all countries have laws prohibiting bribery and corruption, and such laws apply to MSA operations across the world. Accordingly, this Policy extends to all global anti-corruption laws and to all MSA operations throughout the world.
6. Violations of anti-corruption laws can occur even when a payment or offer does not succeed in its intended purpose. Simply promising or offering to make a payment can violate anti-corruption laws.
7. Anti-corruption laws also require companies to maintain appropriate internal controls over their corporate assets and to keep books and records in reasonable detail, so that transactions and dispositions of corporate assets, including cash and other assets, are accurately and fairly reflected in company records.
8. MSA maintains a comprehensive Anti-Bribery / Anti-Corruption Handbook, which should be consulted for a more detailed overview of anti-corruption laws.

CONSEQUENCES OF VIOLATIONS

Violations of anti-corruption laws can result in serious consequences for both MSA and its employees *including imprisonment*. Under these laws, companies and individuals may be subject to criminal and civil penalties. For example:

1. Companies convicted of violating the FCPA may be liable for significant criminal fines for each offense, plus civil penalties and forfeiture of profits derived from FCPA violations. There are many examples of companies being required to pay hundreds of millions of U.S. dollars for violating the FCPA.
2. Individuals convicted of violating the FCPA and other anti-corruption laws can face prison sentences that are sometimes greater than ten years.
3. Companies prosecuted or convicted of violating anti-corruption laws can be barred from doing business with certain governments, including the United States government, and may be ineligible to receive export licenses to ship products from the United States. Companies may also be subject to lawsuits from shareholders, among other penalties.

Employees found to be in violation of the FCPA or other global anti-corruption laws or this Policy will face disciplinary action, up to and possibly including termination of employment.

Third parties found to be in violation of the FCPA, other global anti-corruption laws or this Policy may be excluded from further business with MSA, and any contracts or agreements may be subject to cancellation or termination, with an express reservation of rights by MSA to pursue all available legal remedies as a result of the breach.

POLICY

1. MSA and, its employees, officers, and directors, and third parties acting on the Company's behalf, shall at all times comply with the letter and spirit of all applicable anti-corruption laws in the countries and territories where MSA conducts business. Where questions arise concerning these laws, the Chief Compliance Officer must be consulted for guidance.
2. The Company's compliance with anti-corruption laws can be impacted by the conduct of our business partners. Therefore, MSA will undertake appropriate due diligence before doing business with any third parties engaged by the Company in connection with the promotion, sale, or delivery of MSA products and services. This due diligence will be updated periodically as appropriate under the direction of the Chief Compliance Officer. Such third parties often include distributors, representatives, sales agents, sales consultants, freight forwarders, and customs brokers. Such due diligence must be completed pursuant to due diligence procedures established by the Chief Compliance Officer. Such service providers must also be engaged through appropriate forms of agreement approved by the Chief Compliance Officer.
3. All payments that MSA makes to the third parties described in the prior paragraph must be made and documented in accordance with established Company accounting procedures. Before making payments to a third party service provider, the Company must first receive a detailed invoice and appropriate supporting documentation. Upon payment of any invoice, the Company must maintain appropriate documentation validating the amount paid for the services rendered.
4. Providing gifts, meals and entertainment to customers and other business partners can be an appropriate and legitimate business expense, provided that such hospitality is (a) nominal in value, (b) symbolic and customary in nature, (c) infrequent in occurrence, (d) connected to a legitimate business purpose, (e) permissible under local law, and (f) accurately recorded in the Company's books and records. However, excessive or improper gifts, meals and entertainment can violate anti-corruption laws. Accordingly, the provision of gifts, meals and entertainment to all customers and business partners must conform to this Policy, the MSA Global Code of Business Conduct, and more detailed gifts and entertainment policies and procedures that may be communicated from time to time.
5. MSA recognizes that it may on occasion pay for travel expenses incurred by government officials for the purpose of inspecting an MSA facility, conducting quality assurance audits at MSA locations, or for traveling to MSA facilities for other legitimate and lawful purposes. Such payments by MSA are prohibited except when made pursuant to procedures approved by the Chief Compliance Officer.
6. Facilitation payments are small payments intended to obtain or expedite performance of routine nondiscretionary action by clerical level government officials. Examples of facilitation payments include obtaining routine permits to do business, processing visas and work orders, expediting shipments through customs, and other routine governmental actions. Such payments are unlawful except in rare circumstances. Therefore, MSA prohibits such payments except upon the prior written approval of the Chief Compliance

Officer, which will only be granted in extraordinary circumstances, and only when such payments are lawful.

7. MSA employees are strictly prohibited from, (a) authorizing or funding any transaction that is undisclosed or unrecorded in the Company's books and records; (b) approving, inducing or making any payment with the intention, purpose or understanding that any part of such a payment is to be used for any purpose other than as described by the documents supporting the payment; (c) omitting, falsifying or disguising entries, or otherwise creating misleading or incomplete entries in any of MSA's books and records, including inducing such entries by third parties; and (d) paying expenses that are improper, unauthorized and/or unsupported by proper documentation.
8. Charitable contributions are sometimes used to disguise bribes. For this reason, charitable contributions by the Company may be made only to bona fide charities, only for proper charitable purposes, and must comply with this Policy and the MSA Global Code of Business Conduct and the Company's charitable giving guidelines.
9. Contributions by the Company to any candidate for political office outside of the United States must be approved in advance by the Chief Legal Officer.
10. Perceptions about "acceptable" customary business practices in a particular country shall not be an excuse to violate anti-corruption laws or this Policy.

ADMINISTRATION

1. MSA shall establish and communicate appropriate procedures necessary to carry out the requirements of this Policy.
2. MSA shall provide appropriate training to all employees whose roles are deemed to impact compliance with anti-corruption laws.
3. MSA shall continually enhance, evaluate and communicate this Policy.
4. This Policy is administered by the Law Department. Questions regarding this Policy or the administration of this Policy should be referred to the Chief Compliance Officer.