

Integrity |

Our Basis for Success



Supplier Code of Conduct

MSA Supplier Code of Conduct

Introduction

MSA's core values of integrity, engagement, customer focus, speed & agility, teamwork, innovation & change, and diversity & inclusion drive our behavior. Integrity serves as our foundational value, and all of our core values are encompassed by a culture of safety. We extend these values and our culture of safety to our suppliers throughout the world.

This Supplier Code of Conduct, or the "Supplier Code," 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 management practices. This Supplier Code details our obligations for suppliers. As used in this Supplier Code, "MSA" means MSA Safety Incorporated and each of its global affiliate companies.

Compliance with Laws, Regulations, and MSA Policies

Suppliers are required to comply with all applicable laws, regulations and MSA policies in all circumstances, without exception. Suppliers are responsible for ensuring their subcontractors are in compliance with this Supplier Code.

Violations of the Supplier Code, the law or MSA policy create substantial risk to MSA and our suppliers. Accordingly, such violations will result in appropriate action, up to and including the suspension or termination of business activities.

Import/Export Requirements

Suppliers must comply with all applicable local and international trade laws, including but not limited to, sanctions regulations, country embargoes, and other trade restrictions. Suppliers must have appropriate import/export control processes, technologies and services in place and must acquire all required licenses for the importation, exportation and/or other transfer of its products (if applicable).

In connection with all goods supplied to MSA, Supplier will provide the following information, necessary for MSA's future re-sale, importation, and exportation of products: Country of origin; commodity code (e.g., tariff code); and MSA corresponding part number for each product supplied. Suppliers must follow all applicable laws with respect to restricted business zones and countries. Furthermore, MSA will not do business with Suppliers who support the boycott of trade with Israel or Israeli companies.

Human Rights and Labor Laws

Discrimination

MSA requires that all suppliers provide their employees with a workplace free from unlawful discrimination. This means that we expect suppliers to never discriminate against their employees, subcontractors, or others on the basis of age, color, creed, disability, ethnicity, race, religion, gender, gender identity, marital status, sex, sexual orientation, national origin, citizenship status, Veteran's status, genetic information, political affiliation, disabling condition, or any other characteristic protected by law.

Labor

Suppliers must comply with all applicable laws related to wages, work hours, and benefits. Any overtime should be limited to ensure a healthy and safe working environment.

Suppliers must comply with all applicable laws related to hiring practices and must only employ associates of the lawful minimum age. In the absence of a local law, suppliers must not employ workers under the age of 16, and young workers may not perform hazardous work that could impact their health or safety. MSA will not under any circumstances tolerate human trafficking, or forced, involuntary, child, or slave labor. MSA will not purchase materials from other companies that participate in human trafficking or use forced, involuntary, or child labor.

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Abuse, Harassment, and Retaliation

Each supplier must maintain a work environment free of harassment and abuse. Suppliers must not engage in verbal, physical, sexual, or psychological harassment, and must not allow corporal punishment. Suppliers must also never retaliate or allow or condone retaliation against employees who raise concerns in good faith, and, where permissible by law, supplier should provide a means for employees to report concerns anonymously to supplier.

Environmental, Health and Safety

Workplace Safety

Suppliers must be committed to ensuring the health and safety of all employees. Suppliers' employees must have the right to refuse unsafe working conditions without fear of reprisals or loss of employment. Supplier shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, engineering controls, and/or administrative controls. Supplier shall provide workers with job-related, appropriately maintained, personal protective equipment and instruct on its proper use. Suppliers are required to have procedures in place to instruct and train employees on maintaining a safe and environmentally friendly atmosphere.

Conflict Minerals

MSA is committed to responsible sourcing and expects all suppliers to share that commitment. Suppliers shall comply with MSA's Conflicts Minerals Policy whose requirements include adopting appropriate sourcing practices, providing MSA with appropriate information, and conducting due diligence to facilitate compliance with applicable laws and regulations governing Conflict Minerals. The Conflicts Minerals Policy can be found at: msasafety.com/vendors.

Compliance with Environmental Laws and Regulations

Suppliers must comply with all applicable environmental laws and regulations. When unclear of applicable requirements, suppliers must seek guidance from qualified environmental professionals or regulatory authorities before acting.

Hazardous Substance Management and Restriction

Suppliers shall implement a systematic approach to identify, reduce, and eliminate hazardous substances as identified under global and regional environmental regulations such as REACH, RoHS, California Proposition 65, and similar regulations.

Waste Management

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous and non-hazardous waste.

Wastewater Management

Suppliers shall implement a systematic approach to identify, control, and reduce wastewater produced by its operations. Suppliers shall conduct routine monitoring of the performance of its wastewater discharges and/or treatment systems.

Sustainability and Pollution Prevention

While compliance with applicable laws and regulations is always required, suppliers should act "beyond compliance" as responsible stewards for our natural resources and the environments. Accordingly, suppliers shall reduce energy, water, and natural resource consumption by implementing conservation and substitution measures. Suppliers shall implement source reduction strategies to reduce and eliminate the generation of waste, air emissions, and discharges to water. Suppliers shall minimize hazardous substance consumption by implementing reduction and substitution measures.

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Ethics

Conflicts of Interest

MSA requires that our employees and suppliers make business decisions based upon sound and independent judgment. A “conflict of interest” can arise when that independent business judgment is clouded by a personal interest in a transaction. Conflicts of interest must not influence judgment or objectivity.

Suppliers must also avoid occasions that might appear to create a conflict of interest. In many cases, the mere appearance of a conflict is significant enough to cause suspicion about the appropriateness of a relationship or business transaction.

Bribery and Corruption

Suppliers must comply with the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and all other applicable laws that prohibit companies and their affiliates from engaging in corrupt business practices, such as the promising or offering of anything of value for the purpose of improperly influencing the recipient’s decision making. These laws are aggressively enforced and have harsh penalties for those who violate them, including prison sentences for individuals and severe penalties for companies. Suppliers must not offer, give, promise to give, or accept any kickbacks, bribes, or any other illegal or improper payments either directly or indirectly through a third party, to improperly influence business or to gain an unfair advantage.

Books and Records

Suppliers must maintain processes and controls to ensure the accuracy of their books and records. Suppliers must not falsify or misrepresent any records or transactions. All books and records must accurately reflect the substance of the underlying transactions or events.

Gifts and Entertainment

MSA permits the giving and receiving of gifts and entertainment that are customary business courtesies of nominal value when infrequent in occurrence. Suppliers must not provide gifts and entertainment that attempt to influence, or may appear to influence, the decision-making of MSA employees or other business partners.

Finally, gifts of cash, gift cards, or their equivalent are never permitted, and in all circumstances, gifts must comply with all other applicable laws and regulations.

Please refer to the below guidelines when giving or receiving gifts and entertainment:

- Permissible under local law
- Nominal in commercial value
- Connected to a legitimate business purpose
- Symbolic and customary in nature
- Not of a personal nature
- Infrequent in occurrence

Confidentiality, Intellectual Property, and Data Privacy

Suppliers are required to protect and responsibly use the intellectual assets and confidential information of MSA entrusted to them or created by them. Suppliers are also required to abide by all applicable data privacy laws and regulations.

Suppliers’ use of MSA’s data is restricted to MSA business-related purposes or as otherwise set forth in any applicable agreement(s) between MSA and the Supplier. Suppliers shall comply with MSA’s requirements relating to confidentiality, security, data privacy, and intellectual property protection. Suppliers must respect and honor the intellectual property ownership rights of MSA and others, including without limitation patents, trademarks, copyright licenses, and trade secrets. Suppliers are prohibited from using any MSA or third party technology, copyrighted materials, or other intellectual property or confidential information without prior written permission or license from the intellectual property owner or authorized licensor. Suppliers are further prohibited from transferring, publishing, disclosing, or using MSA’s confidential information other than as authorized by MSA.

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In addition to this Supplier Code, Suppliers are required to comply with the terms of their agreements with and commitments to MSA, including without limitation, all representations and warranties and confidentiality or non-disclosure agreements. Nothing in this Supplier Code shall be deemed to alter or amend any other obligations Supplier may have to MSA (whether such obligation is written or otherwise).

Management System

Suppliers shall implement a management system to ensure compliance with this Supplier Code. The management system should be appropriate to the size and operations of each supplier and be designed to identify, mitigate, and reduce risks in relation to this Supplier Code. Suppliers should regularly review the management system to facilitate continuous improvement.

Supply Chain Transparency

MSA may audit its Suppliers for compliance to the Code or request certification from Supplier of its compliance with some or all of the provisions of the Code. Suppliers shall cooperate timely and fully with any such reasonable compliance audit or request for certification by MSA. **Notwithstanding whether MSA conducts an audit or requests certification of compliance, Supplier acknowledges its acceptance of this Code and its intention to comply with its requirements by virtue of its acceptance of any purchase order from MSA.**

Reporting Concerns

MSA expects its suppliers to promptly inform MSA of any concern involving or affecting business with MSA. Where permissible, suppliers must reasonably assist MSA to investigate good faith allegations of suspected misconduct involving the supplier.

Where to report concerns:

Supplier Relationship Concerns:

MSA's Director of Global Strategy Sourcing and Supply Chain

Compliance with laws, this Supplier Code or business conduct practices:

MSA's Chief Compliance Officer
(email: Integrity@MSASafety.com)

The MSA Ethics Guideline

The MSA Ethics Guideline is a telephone and internet resource available for asking questions or reporting concerns 24 hours a day, seven days a week. The Ethics Guideline can be accessed using a secure, third-party managed website (www.msasafety.com/ethicsguideline) or one of the toll-free telephone numbers listed on the next page. Suppliers have the option to provide a name or to remain anonymous.

Ethics Guidelines

Telephone Numbers

HONG KONG | English

First dial access code 800-96-1111 or 800-93-2266. Then dial 800-205-5119.

HUNGARY | Hungarian/English

Dial 06-800-12927.

INDIA | Bengali/English

First dial access code 000-117. Then dial 800-365-1534.

INDONESIA | English

First dial access code 001-801-10. Then dial 800-205-5119.

IRELAND | English

First dial access code 1-800-550-000 or 00-800-222-55288. Then dial 800-205-5119.

ITALY | Italian/English

Dial 800-788631.

JAPAN | Japanese/English

IDC: 0066-33-801272
Softcom: 0044-22-112676
KDD: 00531-11-5087
All others: 0034-800-900162

KAZAKHSTAN | English/Russian/Kazakh

First dial access code 8-800-121-4321. Then dial 866-455-0427.

MALAYSIA | English

First dial access code 1-800-80-0011. Then dial 800-205-5119.

MEXICO | Spanish/English

First dial access code 01-800-288-2872. Then dial 800-253-5534.

MOROCCO | Arabic

First dial access code 00-211-0011. Then dial 888-507-5625.

NETHERLANDS | English

First dial access code 0800-022-9111. Then dial 800-205-5119.

ARGENTINA | Spanish/English

First dial access code 0-800-555-4288. Then dial 800-253-5534.

AUSTRALIA | English

Dial Optus access code 1-800-551155 or Telestra access code 1-800-881-011. Then Dial 800-205-5119.

AUSTRIA | German/English

First dial access code 0-800-200-288. Then dial 800-504-1785.

BELGIUM | English

First dial access code 0-800-100-10. Then dial 800-205-5119.

BRAZIL | Portuguese/English

Dial 0-800-891-4126.

CANADA | English

Dial 1-800-205-5119.

CHILE | Spanish/English

First dial access code 800-225-288. Then dial 800-253-5534.

CHINA | Mandarin/English

Dial 10-800-110-0563.

COLOMBIA | Spanish

First dial access code 01-800-911-0011. Then dial 800-253-5534.

CZECH REPUBLIC | Czech/English

Dial 800-143-023.

DENMARK | English

First dial access code 800-100-10. Then dial 800-205-5119.

EGYPT | English

First dial access code 2510-0200 (in Cairo) or 02-2510-0200 (all other areas). Then dial 800-205-5119.

FRANCE | French

Dial 0800-90-59-38.

GERMANY | German/English

Dial 0800-1826439.

PERU | Spanish/English

First dial access code 0-800-50-288. Then dial 800-253-5534.

POLAND | Polish/English

Dial 0-0-800-111-1673.

ROMANIA | English

First dial access code 021-800-4288. Then dial 800-205-5119.

RUSSIA | Russian

In Moscow, first dial access code 8-495-363-2400. In St. Petersburg, first dial access code 8-812-363-2400. For all other areas, dial 8 for dial tone, then 10-800-110-1011. After prompt in English, dial 866-455-0427.

SINGAPORE | English

First dial access code 800-011-1111 or 800-001-0001. Then dial 800-205-5119.

SOUTH AFRICA | English

First dial access code 0-800-99-0123. Then dial 800-205-5119.

SPAIN | Spanish/English

First dial access code 900-99-0011. Then dial 800-253-5534.

SWEDEN | English

First dial access code 020-799-111. Then dial 800-205-5119.

SWITZERLAND | German/English

First dial access code 0-800-89-0011. Then dial 800-504-1785.

THAILAND | Thai

Dial 001-800-11-002-2990.

UNITED ARAB EMIRATES | English

First dial access code 800-05-55-66 or 8000-0-6-1. Then dial 800-205-5119.

UNITED KINGDOM | English

First dial access code 0-800-89-0011. Then dial 800-205-5119.

UNITED STATES | English/Spanish

Dial 800-205-5119.