

2024 THE CODE OF ETHICS FOR SUPPLIER BUSINESS PRACTICES



Table of contents

- 1.** MACH's commitment to a sustainable supply chain
- 2.** Legal compliance
- 3.** Our standards
- 4.** Governance
- 5.** Report a concern or problem
- 6.** Certificate of conformity

MACH'S COMMITMENT TO A SUSTAINABLE SUPPLY CHAIN

MACH firmly believes that ethical business practices, a strong commitment to corporate social responsibility, and sustainable business operations are fundamental to navigating the challenges of a constantly evolving environment.

As we continue to explore innovative ways to achieve our goal of being a high-performance company, we are dedicated to creating value for all our stakeholders, including shareholders, employees, customers, suppliers, and the communities in which we operate.

MACH is a **signatory to the United Nations Global Compact** and is committed to actively promoting its ten fundamental principles, which cover human rights, labor, the environment, and anti-corruption.

The Global Compact is an initiative created by UN Secretary-General Kofi Annan to improve corporate responsibility. By joining this initiative, MACH is part of a global movement of over 11,000 companies committed to building responsible and sustainable societies.

For MACH, participating in this initiative represents our desire to align our business strategy with our values as an organization so that it reflects who we are as individuals and what we stand for.

Our Code of Ethics for suppliers' business practices embodies the principles that are at the core of MACH's values. It is in this spirit that MACH wishes to mobilize its supply chain and ensure that its Code of Ethics is upheld by all its suppliers.

This Supplier Code of Business Conduct applies to suppliers of MACH products and services, consultants, agents, and representatives (individually, a «Supplier» and collectively, the «Suppliers»).





LEGAL COMPLIANCE

MACH requires its Suppliers to act as responsible corporate citizens, adhering to all applicable laws and regulations in every country where they operate.

Furthermore, MACH actively encourages its Suppliers to adopt policies, codes of conduct, and management processes that align with the principles outlined in its Code of Ethics.

This approach reflects MACH's steadfast commitment to ethical and legal business practices while fostering strong partnerships with suppliers who share these core values.



MACH STANDARDS

3.1 WORKFORCE

MACH requires its Suppliers to comply with all local labor and employment laws and regulations in the countries where they conduct business. Additionally, Suppliers must adhere to the following principles:

3.1.1 No discrimination in employment opportunities

MACH undertakes to apply the principles of diversity, fairness, and equality in employment. The Supplier must apply these principles in matters of employment and equal pay (minimum wage, working hours, deferral days, for example) without discrimination.

3.1.2 Child labor

MACH is firmly opposed to the use of child labor and will not tolerate any such practices by its Suppliers. For the purposes of this Supplier Code of Ethics, child labor encompasses all types of work performed by individuals under the age of 15, except where such employment forms the basis of vocational training or is part of an educational program. However, in the case of employment that, by its nature or circumstances, is unsuitable for a person under the age of 18, child labor extends to all employees under the age of 18.



3.1.3 Forced labor, modern slavery and human trafficking

MACH condemns all forms of forced labor, slavery, or human trafficking and will not tolerate them from any of its partners or suppliers. Employees of Suppliers must not be threatened or coerced, and under no circumstances should they be required to surrender government-issued identification, passports, or work permits.

3.1.4 Freedom of association

Suppliers must guarantee recognition and respect for employees' right to freedom of association, as well as their right to engage in collective bargaining.

3.1.5 Respect and dignity

Suppliers must ensure fair, ethical, respectful, and dignified treatment of all employees, regardless of their employment status. They are obligated to prevent harassment, intimidation, and victimization in the workplace, in any form. This includes protection against sexual, physical, and psychological abuse, as well as any form of retaliation.

In addition, Suppliers must:

- a) take all necessary measures to prevent occupational diseases and work-related accidents.
- b) provide a safe and healthy workplace for their employees; and
- c) provide the documentation and information necessary to ensure the proper and safe use of the Supplier's products by MACH and its stakeholders.

MACH encourages its suppliers to adopt the following practices:

- Clearly communicate its commitment to improving health and safety to its managers, employees, and subcontractors.
- Analyze and report on health and safety performance.

3.2 HEALTH & SAFETY

MACH requires its Suppliers to prioritize the health and safety of their employees in all aspects of their operations. Suppliers must comply with all applicable health and safety laws, regulations, and standards.

3.2.1 Drugs and alcohol

Suppliers must ensure that each of their employees working on MACH assignments or in MACH facilities complies with all applicable laws and regulations regarding the consumption of alcohol, drugs, or tobacco.

3.3 ENVIRONMENT

MACH is committed to managing its activities in a sustainable manner and in strict compliance with applicable environmental laws and regulations. Suppliers are obligated to comply with the same laws and regulations in their operations. MACH encourages its Suppliers to make environmental protection a priority in all their activities.

Suppliers are required to provide, to the extent possible, the data and information necessary for MACH and its customers to meet their compliance obligations. Suppliers must strive to reduce the environmental impact of their activities and products by adopting a «total life cycle» approach to product

3.3.1 Suppliers must

Put in place appropriate policies, standards, procedures, emergency measures and management systems to ensure the sustainable management of their activities.

Take the necessary measures to prevent pollution, preserve the natural resources required for their activities, and implement appropriate emergency response plans and procedures.

3.3.2 MACH recommends that its Suppliers

Communicate to management, employees, and subcontractors our commitment to improving the environment, and provide information about this commitment.

Evaluate their performance in terms of environmental protection, and report on progress.



3.4 FIGHTING CORRUPTION

Suppliers are obligated to comply with all applicable anti-corruption laws and regulations. This includes provisions prohibiting bribes and other unethical business practices. Additionally, Suppliers are strictly prohibited from making or authorizing any illegal payments in any situation, including to MACH employees.

3.5 FRAUD

Suppliers must act with integrity in all spheres of their activities and must not engage in any fraudulent or criminal activity.

3.6 CONFLICTS OF INTEREST

MACH requests its Suppliers to notify MACH's Compliance and Ethics department of any conflict of interest or appearance of conflict of interest as soon as they become aware of it. Should an activity or mandate be approved despite a real or apparent conflict of interest, this must be documented.

3.7 FAIR COMPETITION AND ANTITRUST LAWS

Suppliers must comply with national and international competition laws, refraining from any involvement in price-fixing, market or customer allocation, market sharing, or collusion with competitors.



3.8 INTELLECTUAL PROPERTY RIGHTS

Suppliers must respect the intellectual property rights of others. They must refrain from disclosing or sharing confidential information belonging to MACH without the company's written consent.

3.9 DATA PROTECTION

Suppliers must comply with all applicable data protection laws and regulations when handling personal information relating to MACH employees and customers. They must immediately report any unauthorized use, disclosure, or loss of personal information belonging to MACH to MACH's Compliance and Ethics department.

4

GOVERNANCE

4.1 COMPLIANCE WITH SUPPLIERS' CODE OF BUSINESS PRACTICES

MACH reserves the right to verify that its Suppliers comply with the provisions of this Supplier Code of Ethics. MACH also encourages its Suppliers to implement the necessary policies and procedures to ensure adherence to the aforementioned principles.

Suppliers are responsible for managing and developing their own supply chains in a way that ensures compliance with MACH's requirements under this Code of Ethical Business Practices for Suppliers.

4.2 SELECTION CRITERIA

Compliance with this Supplier Code of Ethics is one of the key criteria in MACH's Supplier selection process and a certificate of compliance will be attached to the goods or services agreement.

4.3 ETHICS AND COMPLIANCE QUESTIONS AND REPORTS

For any questions or reports of ethical or compliance issues, Suppliers are responsible for contacting MACH's Compliance and Ethics department:



BY MAIL

MACH - Ethics Committee

630 Saint-Paul Street West, Suite 600, Montréal (Quebec) H3C 1L9



BY E-MAIL

ethique@groupepmach.com