



## 1.0 Introduction

M. Holland Company (“M. Holland”) maintains a strong commitment to sustainability and conducting its business in a lawful and ethical manner. Our commitment extends beyond immediate operations, to the suppliers and partners who play an integral role in our supply chain. This Supplier Code of Conduct (“Code of Conduct,” “Supplier Code,” or “Code”) outlines the standards and expectations we hold for all our suppliers, guiding them to align with our values and principles.

As we operate at the nexus of the supply chain and serve nearly every market that utilizes plastic, it is essential that we collaborate with suppliers who share our dedication to upholding human rights, promoting fair labor practices, ensuring environmental sustainability and maintaining a high level of business integrity. By adhering to this Code of Conduct, suppliers become key participants in our mission to create positive social and environmental impacts, fostering long-term partnerships built on trust and mutual respect.

We encourage all suppliers to familiarize themselves with this Code, integrate its principles into their operations, and actively engage in ongoing dialogue with us to ensure its effective implementation. M. Holland expects suppliers to act in accordance with and maintain compliance with the Code, as outlined in section *3.0 Management and Enforcement of the Policy*.

This Supplier Code is therefore made available to our suppliers with the goal of strengthening our mutual understanding of how sustainability and ethics should be practiced in day-to-day business as well as ensuring alignment of core values.

## 2.0 Key Focus Areas

The following are key topics that M. Holland examines and assesses to uphold the highest standards of social, environmental and ethical responsibility within its supplier relationships.

### 2.1 Health and Safety

Suppliers are expected to **provide employees with a safe work environment** and maintain a workplace environment in accordance with local and national laws. This includes the following aspects:

- **Safe Working Environment:** Suppliers must regularly evaluate their working environment to identify potential health and safety risks. Once identified, these hazards must be either removed, managed or reduced. A secure and healthy work environment encompasses, at the very least, provisions for clean drinking water, sufficient lighting, suitable temperature, proper ventilation and sanitation. If applicable, this also extends to safe and healthy residential accommodation provided by the company.

- **Quality and Regulation:** Suppliers must comply with all applicable quality, health, and environmental regulations and permits, including those related to safety, hygiene, sanitation, electrical security, mechanical security and structural security. Suppliers must guarantee that their products and services meet the quality and safety criteria mandated by these relevant laws, as well as any applicable specifications and quality standards.
- **Process Safety:** Suppliers must establish safety programs to effectively oversee and uphold all their production processes in alignment with the relevant safety standards.

## 2.2 Environment and Sustainability

Suppliers are expected to **act as stewards of the environment**, protecting natural assets to the best of their ability and avoiding adverse impacts to human and environmental health. This includes the following aspects:

- **Hazardous Waste and Emissions:** Suppliers must operate in an environmentally responsible manner. At a minimum, suppliers shall comply with all applicable environmental laws and regulations. Ideally, suppliers will ensure systems are in place for safe handling, storage, recycling, reuse and management of waste, air emissions, and wastewater discharges. Suppliers must also have systems in place to prevent or mitigate accidental spills and releases into the environment.
- **Reduction, Monitoring and Management:** Suppliers must engage in the development and use of environmentally friendly products and processes to reduce power consumption, greenhouse gas emissions and overall negative climate-related impacts. The supplier should develop robust means by which it identifies and monitors the environmental impacts of its activities, allowing negative impacts to be minimized and/or eliminated at the source.
- **Resource Conservation:** Suppliers must use natural resources (e.g., water, sources of energy, raw materials) in an economical way. We expect that suppliers will adopt plans to monitor and improve their impact on the environment on an on-going basis.

## 2.3 Labor and Employment

Suppliers are expected to **protect the human rights of their employees**, and act in accordance with the principles of the International Labor Organization and the UN Universal Declaration of Human Rights. This includes the following aspects:

- **No Forced Labor:** Suppliers will not utilize forced, bonded, indentured labor or involuntary prison labor. Specifically, suppliers will not use forced labor as defined by U.S. Section 307 of the Tariff Act of 1930 (19 U.S.C. §1307), ILO Forced Labor Convention (No. 29) and the Abolition of Forced Labour Convention (No. 105). Suppliers will comply with all applicable local laws and regulations, directly or indirectly, governing forced labor,

including, but not limited to, the forced labor provisions in U.S. Section 307 of the Tariff Act of 1930 (19 U.S.C. § 1307) and Trade Facilitation and Enforcement Act of 2015 (TFTEA), and the applicable provisions of the Uyghur Forced Labor Prevention Act (UFLPA).

- **No Child Labor:** Suppliers must prevent any form of child labor, consistent with the conventions of the International Labor Organization.
- **Working Hours, Wages and Benefits:** Supplier must adhere to all applicable laws regarding working hours, wages, social security payments and overtime payments. Workers will be paid at least the minimum legal wage or better, and suppliers must pay workers in a timely manner.
- **Non-Discrimination:** We encourage suppliers to embrace the principles of diversity, equity and inclusion in the workplace and within their supply chains, and to always treat employees with respect and dignity. At a minimum, suppliers must not discriminate in hiring or employment practices based on race, color, religion, sex (including pregnancy), age, sexual orientation, gender identity or expression, national origin, ancestry, citizenship status, physical or mental disability, military or veteran status, genetics, or any other protected status protected by applicable federal, state or local law. Further, suppliers must provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, verbal abuse or the threat of any such treatment.

### 2.4 Ethical Behavior

Suppliers are expected **to conduct their business ethically** and to conduct all operations in a responsible and lawful manner. This includes the following aspects:

- **Fair Competition:** Suppliers are expected to engage equitably with customers, their own suppliers, competitors and employees. Suppliers are required to operate their business in alignment with principles of fair competition and in compliance with relevant anti-trust legislation.
- **Conflicts of Interest:** Suppliers must not engage in any activity that could create a conflict of interest. Where a conflict of interest does exist, it must be reported to M. Holland so that appropriate actions can be taken.
- **Anti-Corruption and Business Integrity:** Suppliers are expected not to practice or tolerate any form of corruption, extortion or embezzlement and to abide by all applicable anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act. Specifically, suppliers must not directly or indirectly offer, pay, promise or accept bribes.

- **Privacy and Intellectual Property:** Suppliers must respect intellectual property rights and safeguard customer information to the best of their ability, including only making appropriate use of confidential information.
- **Conflict Minerals:** Suppliers must ensure that products supplied do not contain metals derived from conflict minerals. Suppliers must comply with all applicable laws and regulations regarding the sourcing of minerals from conflict areas.

### 3.0 Management and Enforcement of the Policy

Suppliers are expected to **monitor their own compliance with the Code and with all applicable legal requirements**. This includes the following aspects:

- **Commitment and Accountability:** M. Holland holds Suppliers accountable for operating in accordance with this Supplier Code of Conduct and communicating the Code to its employees, agents and representatives, and throughout its supply chain. We expect that Suppliers will maintain appropriate risk management systems, proper documentation and employee trainings as required by law.
- **Confidentiality:** Suppliers must hold information regarding M. Holland in strict confidence and must not disclose any such information to a third-party.
- **Compliance with the Code:** Suppliers are expected to monitor their own compliance with the Supplier Code of Conduct. M. Holland will not be assessing suppliers' compliance with the Code, nor imposing penalties for violations of this Code.

**For questions regarding this Code, contact** [insert M. Holland contact email]

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