McKinstry Supply Chain Code of Conduct

As part of our Action for Impact plan, McKinstry has set ambitious goals to ensure a resilient future for our company and the communities we serve. Included in these goals are efforts to address the climate, affordability, and equity crises directly through the establishment of ethical business practices and environmentally sustainable operations.

At the same time, we recognize we cannot achieve these goals alone, and we will require trusted partnerships across our value chain to not only mitigate risks but also foster a culture of sustainable responsibility. This Supply Chain Code of Conduct is a signal of our joint commitment to our customers, our employees, and our communities that we uphold the highest levels of business integrity, champion human rights and fair labor practices, and promote environmental stewardship at every level of our business.

SUMMARY

McKinstry, (encompassing both McKinstry Co. and McKinstry Essention), believes in creating a positive difference for both people and the planet through our deep commitment to diversity/equity/inclusion, decarbonization, and community engagement. **We expect our supply chain partners to make a good faith effort to adhere to these same principles as described below** and demonstrate the highest standards of business conduct, integrity, and adherence to local laws and regulations. We may or may not request additional information from supply chain partners and/or engage third party auditors to learn more about our partners ethical and sustainability practices. Provisions in the Code of Conduct reflect a minimum standard expected of supply chain partners, and specific projects may include additional terms and conditions that go further than provisions outlined in this document. Egregious violations of the terms laid out in the Code of Conduct may result in McKinstry terminating work with that supply chain partner.

SCOPE

A Supplier is any third party, firm or individual that provides a product or service to McKinstry. These include suppliers, vendors, consultants, agents, contractors, subcontractors, temporary workers, and third parties working on behalf of the firm. This also encompasses the owners, officers, directors, employees, consultants, affiliates, contractors and subcontractors of these organizations and entities. All persons, entities, and organizations (collectively referred to as "Supply Chain Partners") are covered by the Code of Conduct and thereby evaluated by its terms.

ALIGNMENT WITH EXTERNAL PARTIES

In addition to McKinstry's foundational **values**, the Code of Conduct aligns with the principles and guidelines of several leading institutions that have identified best practices in ethical and sustainable supply chain management. These institutions include, but are not limited to:

- Institute of Supply Management
- United Nations Sustainable Development Goals
- Global Reporting Initiative (GRI)
- Sustainable Accounting Standards Board (SASB)
- Greenhouse Gas Protocol

COMPONENTS OF OUR SUPPLY CHAIN CODE OF CONDUCT

McKinstry's Code of Conduct covers a range of ethical and sustainability related topics, each outlined in detail below.

ENVIRONMENT

McKinstry encourages its suppliers to demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide. Suppliers should have in place an effective environmental policy, statement, or program to mitigate these risks, the implementation of which should be evident throughout all levels of the company.

Supply Chain Partners should have processes in place to ensure their operations conform to all applicable environmental legislation. All required environmental permits, approvals and registrations are to be obtained, maintained, and complied with in accordance with the conditions and requirements defined therein.

Environmental performance should be measured, monitored, and reviewed regularly. The supplier should endeavor to make continuous improvements in environmental performance through practicable measures and employ leading practices where possible.

Materials

Supply Chain Partners should make practical efforts to minimize the use of energy, water, and raw materials. Where possible, these should be renewable or sustainably sourced.

Climate Change

Emissions to air likely to cause pollution or contribute to climate change should be monitored, controlled, and minimized where possible.

Waste

Supply Chain Partners shall make practical efforts to eliminate or reduce levels of waste generated and should reuse and recycle waste materials wherever possible. The handling, storage, movement, treatment, and disposal of all waste must be carried out in accordance with applicable regulation and in an environmentally responsible manner.

Environmental Performance in Supply Chain

Supply Chain Partners should consider the environmental credentials and performance of vendors within their own supply chain and require them to operate to a minimum set of standards as defined by local rules and regulations. Products and services provided to McKinstry should include options that offer reduced environmental impact by utilizing environmentally sound technologies, processes, and sustainable materials, etc.

LABOR

Human Rights

Supply Chain Partners should ensure that they and/or their subcontractors and suppliers shall respect the rights of their employees and comply with all relevant legislation, regulations and directives in the country or countries in which they operate. This includes all rights and minimum standards relating to wages, benefits and working conditions applicable across their entire workforce.

McKinstry is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. McKinstry will not tolerate or condone human trafficking or slavery in any part of our organization. In support of our commitment against human trafficking, McKinstry strives to engage in business relationships with contractors, subcontractors, vendors, suppliers, partners and others who also support the commitment against human trafficking and any practice that constitutes trafficking of persons or slavery.

Health & Safety

Supply Chain Partners must ensure that they and/or their suppliers abide by all local laws, directives and regulations relating to health and safety in the workplace or in any other location other than the workplace where production or work is undertaken and that they implement any amendments to these laws, directives, or regulations.

Diversity, Equity, & Inclusion

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Our sourcing decisions, contracts and management of supplier relationships will reflect and promote the principles of the McKinstry diversity, equity, and inclusion policies in that they will seek to ensure that Supply Chain Partners do not victimize, harass or discriminate against any employee or party to the contract due to their age, race, national origin, ethnicity, gender identity or expression, physical ability, sexual orientation, political affiliation or religious belief.

Supply Chain Partners will be required to meet the requirements of any applicable discrimination legislation. Our Supply Chain Partners will be treated fairly and equally during the tendering and purchasing process, with decisions made on the basis of clear selection criteria.

McKinstry encourages Supply Chain Partners to have a policy that explicitly bans discrimination/bullying and harassment based on age, race, national origin, ethnicity, gender identity or expression, physical ability, sexual orientation, political affiliation or religious belief. In addition, Supply Chain Partners are also encouraged to have evidence of diversity and inclusiveness training that is inclusive of sexual orientation and gender identity/expression.

Vendor Diversity

McKinstry's Vendor Diversity initiative's key objective is to identify, develop and utilize certified diverse-owned businesses that can enhance our competitive advantage and provide innovative and cost-effective products and services for us and our clients. It is McKinstry's expectation that all Supply Chain Partners use their best efforts themselves to procure diverse businesses to compete for goods and services to become preferred suppliers to the supplier and/or as its subcontractor(s). In accordance with the terms of its agreement with a McKinstry entity, Supply Chain Partners commit to comply with all relevant regulatory agency requirements, as well as with any local diversity regulations and programs.

For the purposes of this Code of Conduct, a "diverse business" is a company that is certified to be at least 51%-owned, -operated and -controlled by one or more minority, woman, LGBT+ person, person with a disability, veteran, service-disabled veteran, or aboriginal or indigenous person. In addition, historically underutilized business and social enterprises as defined by the local country will be included in the diverse business classification.

It is McKinstry's commitment that diverse business enterprises shall have equal opportunity to compete for all goods and services to become preferred suppliers and/or subcontractor(s) for the organization. McKinstry is committed to the development and growth of diverse business enterprises to build a better working world and to expand networks to build trusted and enriched relationships.

McKinstry encourages Supply Chain Partners to have equivalent policies to promote diversity in their supply chain and purchase from diverse businesses. Supply Chain Partners agree to make a reasonable effort to utilize diverse suppliers and provide evidence to McKinstry upon request.

ETHICS

Business Integrity

The highest standard of integrity is expected in all our business dealings. McKinstry employees will not accept a gift of any kind from a client, supplier or vendor representative that could be perceived to constitute a bribe, kickback, facilitation payment, or reasonably contribute to corruption. Gifts provided because of a McKinstry-sponsored sales promotion are generally acceptable to provide to others, so long as the gifts follow local, state, and federal law within the applicable jurisdiction. Receiving a promotional gift is acceptable so long as the gift has also already been, or will soon be, given to other similar suppliers or clients.

Any and all forms of corruption, extortion, bribery (including facilitation payments) and embezzlement are strictly prohibited and may result in immediate termination and legal action. Supply Chain Partners shall comply fully with all laws and regulations applicable to them.

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Supply Chain Partners must comply with all applicable trade control laws and regulations in the import, export, reexport or transfer of goods, services (including software and technology). All invoices and any customs or similar documentation submitted to McKinstry or governmental authorities in connection with transactions involving McKinstry must accurately describe the goods and services provided and the price thereof.

Supply Chain Partners shall not share or exchange any price, costs or other competitive information or undertaking of any collusive conduct with any other third party to McKinstry with respect to any proposed, pending, or current McKinstry procurement.

Supply Chain Partners will only use subcontractors or other third parties who comply with all applicable laws and regulations and who adhere to the same (minimum) standards set forth in this guide.

Conflict of Interest

A conflict of interest may exist when a Supplier is involved in an activity that affects – or could appear to affect – objectivity. Personal or business relationships, outside business activities and personal investments can all pose potential conflicts. In order to identify and manage such conflicts, Supply Chain Partners should disclose all actual or potential conflicts of interest with McKinstry due to either:

1. Personal or business relationships with firm customers, suppliers, business associates, and employees with whom they work and/or support.
2. Outside activities related to Supplier's role and responsibilities at McKinstry.

All potential conflicts of interest should be reported to the Supplier's Relationship Manager (McKinstry Purchasing, McKinstry Subcontract, or McKinstry Corporate Procurement).

Protection of Information

Supply Chain Partners should safeguard and make only proper use of confidential information, including personal information, to ensure that the rights and interests of McKinstry and those who have entrusted their information with McKinstry are protected. Supply Chain Partners shall comply with applicable privacy and information security laws and associated regulatory requirements as well as with McKinstry's privacy and security policies when personal information is collected, stored, processed, disclosed, transferred and/or shared. Furthermore, Supply Chain Partners should implement effective management systems and a governance structure to facilitate compliance with all applicable laws and promote continuous improvement with respect to the expectations set forth in this Supply Chain Code of Conduct.

McKinstry reserves the right to updates the Code of Conduct at any time and will provide Supply Chain Partners with these updates as needed.