



## SUPPLIER CODE OF CONDUCT

The McAllen Metal Stamping Code of Conduct (“Code”) formalizes the key principles under which suppliers to MMS are required to operate.

In selecting suppliers, MMS works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with those of MMS.

This Code formalizes MMS’s practices and makes clear that, recognizing differences in cultures and legal requirements, we expect that wherever our suppliers are located, producing products for us, producing components that we use in our products, and wherever services are performed for us (collectively “Suppliers”), that they are produced and/or provided in a manner compatible with the high standards that contribute to the outstanding reputation of MMS and our brands. Suppliers are required to comply with this Code and to have and maintain practices similar to those in MMS.

This Code applies to all Suppliers of MMS including every facility of a Supplier. MMS strongly encourages Suppliers to

exceed the requirements of this Code and promote best practices and continuous improvement throughout their operations and those of their suppliers, service providers, and extended networks. If there is a conflict between applicable laws and this Code, or there is no local legal requirement, the stricter standard shall apply if it does not violate local law. A Supplier must contact MMS to discuss any inconsistency between a Code requirement and applicable local law.

### Laws and Regulations

Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate and also in full compliance with this Code.



As a leading provider of stamping solutions, McAllen Metal Stamping is committed to conducting all affairs lawfully and with integrity, wherever we do business. It is equally important that our important suppliers follow the same principles and business practices.

Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate and also in full compliance with this Code.

Therefore, please note that the MMS has develop new policies as part of a Code of Conduct for Suppliers and you are now requested to review the requirements and ensure compliance with the Code.

Should you have any question, please contact us.

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In McAllen Metal Stamping we recently we have developed a new standard, MMS Code of Conduct, which provides a Code of Conduct for our Employees, Customers & Suppliers and Community.

Listed below, are some of key points described in our policies as Code of Conduct regarding Customers & Suppliers.

- We are committed to quality in all of our work.
- We work with suppliers and customers who share our standards of business.
- We respect the laws and government of each country in which we operate.
- We support competition and follow all antitrust laws.
- We avoid conflicts of interest.
- We follow laws regarding insider trading.
- We practice honest accounting standards.
- We protect the confidential information of McAllen Metal Stamping and our customers.

## **HUMAN RIGHTS**

MMS is committed to human rights for all people in the world and comply with employment laws in the markets where we operate.

Freedom of Association:

MMS respects the right of employees to join or not join an independent trade union and will bargain in good faith with these associations when they are properly elected.

- Forced Labor:
- MMS does not accept or condone any aspect of forced labor, including indentured, bonded or prison labor. Our suppliers must meet these requirements and be compliant with the law, codes and policies.
- Child Labor:
- MMS adheres to and strictly enforces child labor laws.
- MMS must therefore not use children below the age of 15 years as part of its work force except as part of governmental approved work training, apprenticeship or similar programs, which beyond doubt would be clearly beneficial to the participants.
- Suppliers must comply with local laws regarding the minimum age of employees. Must comply with all legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, safety, working conditions, and the handling of certain materials.

- Women's Rights:
- MMS ensures women workers receive equal treatment in all aspects of employment.
- Nondiscrimination:
- Suppliers must ensure employment – including hiring, payment, benefits, advancement, termination and retirement – is based on ability and not on beliefs or any other personal characteristics such as color, race, caste, religion, age, maturity, nationality, social or ethnic origin, status, sexual orientation, gender, gender identity or expression, HIV, marital status, pregnancy, political affiliation, military service (Veterans), union membership, disability or any other status or characteristic that is not related to the individual's merit or the inherent requirements of the job.
- Suppliers:
- MMS seeks to ensure that its suppliers observe similar standards in their relations with their employees and their own suppliers.
- Harassment:
- Suppliers must treat all workers with respect and dignity. No workers shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, suppliers will not use monetary fines as a disciplinary practice.

- Political activities and contributions:
- MMS is politically neutral and will not contribute to any political party or politician. No MMS Company brand name or logotype name is permitted to be used in political campaigns or for the benefit of a specific political interest.
- Wage and Benefits:
- Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime hours at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. In addition, Suppliers must provide accident insurance to their workers for work-related accidents and compensation for work-related accidents resulting in permanent disability.
- Hours of Work:
- Suppliers must ensure that on a regularly scheduled basis, except in extraordinary business circumstances, workers are not required to work more than (a) 60 hours a week, including overtime, or (b) the limits on regular and overtime hours allowed by the laws of the country of manufacture. In addition, except in extraordinary business circumstances, all workers are entitled to at least one day off in every seven-day period.

## ETHICS

Our aim is for MMS to be known, trusted and respected. In all aspects of our business, we're continually looking for ways to ensure that we do the right thing.

- We will pursue our business with honor, fairness and respect for the individual and the public at large ... ever mindful that there is no right way to do a wrong thing.
- We expect our employees to comply with all laws, regulations and company policies that govern our activities.
- We keep the customer at the center of everything we do. Our customers are at the core of our vision, mission, and strategy. We comply with all applicable laws, regulations and restrictions in the import and export of products, services information and technologies, and trade compliance laws. This includes without limitation laws and regulations related to export control, trade embargoes, economic sanctions, and country of origin marking.
- We respect privacy. We want to earn and keep trust. We work hard to protect any personal information shared with us.

- We respect each other and promote diversity and inclusion. We value each other and our unique thoughts and ideas. We recognize that appreciating our differences allows everyone to contribute to their fullest potential.
- We are committed to sustainability and the environment. We believe in, and work hard for, sustainable use of natural resources in our facilities and products.
- We report our work accurately. We create timely, honest, and accurate business records, following processes and controls.
- We use company assets properly. We protect and use our resources with integrity and efficiency. Company assets consist of everything MMS owns including:
  - Financial assets cash, bank accounts and credit standing
  - Physical assets MMS facilities, vehicles, equipment and inventory.
  - IT/IS related assets – computer hardware, software and information systems including data they create, transact and/or store.
  - MMS and Customer Intellectual property rights.
- We safeguard confidential information. We protect and manage information appropriately and maintain no whistleblowing retaliation.
- We avoid conflicts of interest. We act in the best interest of MMS, avoiding even the appearance of a conflict.
- We represent the company properly. We follow proper protocols regarding who may speak and act on behalf of MMS.
- We prevent bribery. We do business without bribes or corruption.
- We compete fairly. We're are committed to fair and open competition.
- We do not tolerate money laundering or use of counterfeit parts. We only do business with reputable parties. No sale or business relationship is worth compromising our integrity.
- We manage our business appropriately. We strive to earn trust every day by doing business with integrity all over the world.
- We expect our suppliers to conduct business ethically. Our suppliers are key to our success and to maintaining the high standards and reputation of our products.



## **HEALTH & SAFETY**

McAllen Metal Stamping is committed to protecting our employees, preserving the environment and acting sustainably throughout our business operations. To ensure compliance with regulatory requirements and achieve the goals of this policy we are committed to:

### Protecting our Employees

- Prevent work-related injuries and illnesses and preserve emotional well-being for our employees.
- Foster active participation and involvement of employees at all levels in our Environment, Health and Safety (EHS) processes.
- Adopt and promote behaviors that improve our performance and culture.

Suppliers must provide workers a clean, safe and healthy work environment in compliance with all legally mandated standards for workplace health and safety in the countries in which they operate. This includes any residential facilities a Supplier provides to its workers.

### Preserving the Environment

- Improve environmental and energy performance by identifying environmental aspects, threats, and

opportunities, and the conservation of natural resources, waste minimization and prevention of pollution.

- Identify and comply with MMS standards associated with management of EHS and sustainability.
- Integrate EHS and sustainability aspects into business processes, from planning through execution.

### Acting Sustainably

- Establish goals, objectives, targets and periodic reviews in all areas related to the management of EHS and sustainability to drive continual improvement.
- Implement processes, practices, programs, procedures and allocate resources to support implementation of this policy and legal requirements.

McAllen Metal Stamping will review this EHS & Sustainability policy periodically to ensure its continued applicability, effectiveness and alignment with the MMS Code of Conduct.

## **ENVIRONMENT**

MMS is committed to providing a safe and healthy workplace along with protecting and conserving the environment. MMS will meet and/or exceed federal, state,



and local requirements and corporate environmental objectives.

MMS will strive for continuous improvement in the reduction of waste, use of natural resources and a positive impact on the environment. The following principles are fundamental to achieving these objectives:

- A safe work environment with zero tolerance for unsafe acts or conditions
- Improving the efficiency and conservation of energy and natural resources
- Implement effective recycling programs in manufacturing and administrative operations
- Comply with all applicable environmental laws and regulations and other requirements

Suppliers must comply with all local environmental laws applicable to the workplace, the products produced, and the methods of manufacture. Additionally, Suppliers must not use materials that are considered harmful to the environment, but should encourage the use of processes

and materials that support sustainability of the environment.

MMS will act responsibly in providing the necessary support to ensure that the foregoing objectives and principles are achieved.

### **COMMUNICATION**

Suppliers should communicate, through their existing ethical operating standards/practices or through this Code, so that their workers, supervisors and permitted subcontractors are aware of the expectations /requirements detailed in this Code.

### **TERMINATION**

Failure to comply with this Code, or a violation of applicable international laws, can result in loss or termination of business upon written notice from MMS.