

MCLCREATE LIMITED (“MCLCREATE”) SUPPLIER CODE OF CONDUCT

Code of Conduct for mclcreate Suppliers

This Code of Conduct applies to all businesses that provide goods or services to mclcreate. mclcreate expects all suppliers that deal with mclcreate to conduct their business in a responsible, lawful and ethical manner, respecting fundamental human rights and recognising their responsibility to minimise any environmental impact of their operations. mclcreate requires all suppliers to commit to this Code as a condition of doing business with mclcreate.

Legal compliance

The supplier must comply with all applicable laws and regulations in every relevant jurisdiction. The supplier should inform mclcreate in the event of: any breach of this Code by the supplier; of any significant breach of applicable laws or regulation; and of any allegation of breach or investigation that may materially affect the supplier's ability to provide the goods or services to mclcreate. The supplier should also bring to the attention of mclcreate any actions by a mclcreate employee which are inconsistent with this Code.

Ethical conduct

The supplier will maintain the highest standards of ethics, at all times conducting its business with integrity and in an open, honest and transparent manner.

The supplier must not engage in any conduct or public comment that is intended to damage or has the effect of damaging the interests or reputation of mclcreate, its customers or other stakeholders or parties with whom mclcreate interacts.

The supplier must not engage in any form of corruption or bribery. Bribes, kickbacks and similar payments or means of obtaining any undue or improper advantage must not be offered or accepted, whether directly or indirectly. Payments to officials to facilitate routine actions or decisions are similarly prohibited unless personal safety is at risk.

Reasonable gifts and hospitality may be acceptable if in accordance with local custom and applicable law and of a value or frequency that is insufficiently material to influence business decisions.

The supplier must not engage in any conduct, arrangement or practice or be party to any agreement that is anti-competitive in law.

The supplier must keep all financial and other records required by applicable accounting practices, law or regulation and must properly pay all taxes arising on its operations wherever and whenever due.

Human rights and labour

The supplier must respect the fundamental human rights of all workers in its supply chain, treating them with dignity and respect. The supplier will promote diversity and equal opportunities in the workplace and prohibit discrimination or unequal treatment based on race, colour, nationality, social background, disability, sexual orientation, political or religious conviction, gender or age, pregnancy, union membership or any other characteristic protected by law.

Suppliers shall respect the personal dignity and privacy of each worker. No worker shall be subject to any form of bullying, harassment or abuse (whether mental, sexual or physical) or to any behaviour which is threatening or exploitative.

The supplier must not participate in any form of human trafficking or forced, involuntary or slave labour. The supplier shall not use or employ child labour (as defined by International Labour Organisation Convention 138). No person under the age of 18 should be engaged to carry out any work which is likely to jeopardize his/her physical or mental health, safety or morals.

The supplier shall provide fair remuneration which as a minimum complies with the applicable minimum wage in the country of employment and is paid on time and without unlawful deduction. Monetary fines shall not be used to discipline workers. Working hours shall not exceed the maximum number of working hours provided by applicable law.

The supplier shall respect the right of workers to associate freely by joining or not joining a trade union or employee representative organisation and to raise concerns without fear of retaliation, intimidation or harassment.

Health and safety

The supplier shall be responsible for maintaining a safe and healthy working environment for its employees and others affected by its activities. The supplier shall take all reasonable precautionary measures against accidents and occupational diseases and to identify and control hazards. The supplier should ensure that its employees, agents and contractors are properly trained in health and safety issues; have access to and use of appropriate safety equipment; and that a suitable occupational health and safety management system is in place.

Confidentiality and Privacy

The supplier must take all reasonable steps properly and effectively to safeguard all confidential information and data of mclcreate and mclcreate's customer that the supplier may receive or process in the course of any dealing with mclcreate. All personal data shall be processed and managed in accordance with applicable data protection laws.

The supplier shall not use any trademark, copyright materials or other property, assets or rights of mclcreate or its customer except as may be necessary for the purpose of providing the relevant supply or as expressly authorised.

Environmental protection

The supplier shall conduct its activities and operations in accordance with all applicable laws and standards relating to environmental protection and so as conserve natural resources and to minimise waste, emissions and other negative environmental impact. Where reasonable and appropriate to do so, materials should be reused or recycled.

Supply chain transparency

The supplier shall communicate this Code to those of its own suppliers involved in the supply chain to mclcreate and shall in turn use reasonable efforts to promote and obtain compliance from such suppliers.

The supplier will comply with all reasonable requests from time to time by mclcreate to audit and review compliance with this Code of Conduct, to provide copies of relevant documentation and to implement and verify reasonable corrective action. Such inspection and review may be conducted by mclcreate or mclcreate's customer or their respective representatives at any premises of the supplier or its agents or contractors.

Amendments

mclcreate reserves the right to amend this Code of Conduct from time to time by publishing an updated version on its website. mclcreate will not be obliged to give notice to the supplier of any such amendment or update.