



SUPPLIER CODE OF CONDUCT GUIDE

For MGM Resorts International
March 2024



MGM RESORTS
INTERNATIONAL®

INTRODUCTION

MGM Resorts International (MGMRI) is committed to conducting business in an ethical, legal, environmentally responsible, and socially responsible manner. As stated within the MGMRI Supplier Code of Conduct (“Code of Conduct” or “Code”), we expect all business partners in the value chain, including but not limited to suppliers of goods and services, vendors, contractors, service providers, and their business partners (“Supplier(s)”), to commit to our Code of Conduct and the expectations it sets forth.

This Supplier Guide (“Guide”) is a supplemental document that outlines the steps and actions suppliers can take to ensure alignment with, and go above and beyond, the requirements of the Code of Conduct. MGMRI requires its business partners to ensure compliance with all applicable laws and regulations as mandated by national laws. While some of the guidance in this Guide might align with applicable regulations, this Guide does not intend to provide a comprehensive overview of steps required for compliance with local laws and regulations.

Following the structure of the Code, each section includes the Code clause as well as guidance on how suppliers can build and maintain operations, policies, and procedures in alignment with MGMRI expectations at two levels, Fundamental and Encouraged.

- **Fundamental** — Refers to performance in line with internationally agreed standards and applicable UN and ILO Conventions, to support alignment with the expectations set forth in the Code of Conduct.
- **Encouraged**— Refers to performance that goes above and beyond minimum expectations at Fundamental level and provides guidance for suppliers to advance their sustainable business practices and align with MGMRI Sustainability Strategy.

Our expectations reflect our commitment to internationally agreed upon standards, including the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. It also supports the commitment MGMRI has made to the Principles of the United Nations Global Compact, to which our company is a signatory. The Guide also includes reference to a number of multistakeholder standards and guidelines on human rights, environment and animal welfare.

We recognize that the expectations and recommendations in this Guide may not be applicable to all suppliers and therefore they should be considered as supplemental guidance to the Code of Conduct. Suppliers may share this document with their business partners to support their alignment with the Code of Conduct.

MGMRI holds the right to amend this Supplier Guide as its program and expectations evolve. Changes in our expectations will be communicated to suppliers.

Suppliers can reach out to Sustainable Procurement at sustainableprocurement@mgmresorts.com for any questions about this Guide.

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HUMAN RIGHTS

Discrimination

Suppliers must not discriminate against workers and other stakeholders, including customers and business partners, on the basis of race, color, national origin, ancestry, sex, gender identity or expression, transgender status, age, sexual orientation, religion, veteran status, disability, perceived disability, union affiliation, genetic information, marital status, pregnancy, lawful migrant status, or other similar factors in hiring, terms and conditions of work, or other employment practices.

Suppliers must recognize the right of all workers to equal opportunities in all aspects of employment, including benefits, remuneration, training, evaluation of the quality of their work, and access to professional development and advancement.

Fundamental:

- Ensure that all workers have equal access to employment opportunities through policies that communicate the requirements for hiring, job placement, compensation, and advancement based on their qualifications, performance, skills, and experience.
- Create and distribute job descriptions for all positions that do not include criteria not related to job task (i.e., gender, biological, physical or age characteristics).
- Ensure all workers are paid equally, regardless of gender or other factors unrelated to job, according to salary scales that meet national and local wage laws or industry standards, whichever are higher.
- Do not require workers to undergo medical testing prior to being hired as a condition of employment. This includes but is not limited to pregnancy or HIV testing.
- Ensure a channel for reporting and addressing worker concerns is available to all workers regardless of employment status.

Encouraged:

- Actively engage with workers to understand specific concerns, for example through Employee Resource Groups.
- Establish criteria for supplier diversity to embed diversity, equity, and inclusion in procurement practices.
- Review hiring practices to ensure the company formally promotes a culture of diversity, equity and inclusion in job postings, outreach, communications with candidates and recruitment.



HUMAN RIGHTS

Harassment & Abuse

Suppliers shall treat workers with dignity and respect. Suppliers are expected to neither commit nor tolerate any form of harassment or abuse in the workplace. This includes discrimination, physical, verbal, mental, sexual, and psychological harassment, coercion, and abuse. All workers must be protected from retaliation, including as related to reporting incidents of harassment and abuse.

Fundamental:

- Ensure workers and supervisors are aware of the different forms of harassment that can occur, including physical, verbal, mental, sexual, and psychological harassment, coercion, and abuse, and provide examples.
- Do not allow workers, supervisors, or leadership to use physical punishment or verbal threats as a disciplinary practice.
- Ensure there is no reported or observed evidence of physical or verbal threats to workers in the workplace.
- Train all workers on how to report incidents (e.g., via confidential hotline or report to human resources) and clearly communicate that all whistleblowers are protected from retaliation.
- Develop a clear escalation path for reported issues, and immediately investigate any claims of harassment or abuse reported via the grievance mechanism or otherwise.
- Take disciplinary action when appropriate. Serious and/or repeated violations should result in termination and / or legal action as prescribed by local and international law.
- Ensure there is no reported or observed evidence of physical or verbal threats to workers in the workplace.
- Immediately investigate any claims of harassment or abuse reported via the grievance mechanism or otherwise and take disciplinary action when appropriate. Serious and/or repeated violations must result in termination and / or legal actions as prescribed by local and international law.
- Maintain written records of disciplinary measures taken and ensure consistent, well understood discipline across the company.

Encouraged:

- Develop dedicated training for supervisors and management on how to recognize different forms of harassment that can occur in the workplace, with special attention to issues related to gender and race, as well as supervisor and managers obligations to report, investigate, and/or take appropriate remedial responsive action.



Wages, Benefits & Hours

At a minimum, Suppliers must operate in full compliance with all applicable labor laws regarding wages, work hours, vacation time, overtime, holidays, and benefits. Suppliers must not require workers to work more than the lesser of a) 48 regular work hours per week, plus 12 hours of overtime, or b) the limits on regular and overtime hours as allowed by local law, except in extraordinary circumstances and strictly in compliance with all applicable laws. All overtime must be performed on a voluntary basis.

Workers must have at least one day off for every seven-day work period. Suppliers must provide wages and benefits to workers as required by law, the local industry standard, or as stated in written employment terms, whichever is higher. This includes payment of overtime work at a premium rate. Deductions from wages as a disciplinary measure is prohibited. All wages owed to workers must be distributed in a timely manner and in compliance with the applicable law. Suppliers must keep complete, transparent, ongoing, and accurate records of worker compensation and time worked.

Fundamental:

- Communicate wage and benefits policies to all workers in the language of the employee.
- For each pay period, provide workers an understandable wage statement, which includes days worked, wage or piece rate earned per day, hours of overtime at each specified rate, bonuses, allowances and legal or contractual deductions.
- Keep records of all wages for at least 12 months, or as prescribed by local laws, whichever is longer.
- Ensure timecards are clear and easy to understand for workers.
- Ensure consistency in how work hours are calculated across positions.
- Implement an overtime request form and overtime tracking system to ensure overtime is voluntary.
- Regularly review internal processes for time tracking to ensure hours worked and overtime are calculated and compensated correctly.
- Ensure all mandated benefits are paid in a timely manner, as defined by national and local law. If no time period is defined by law, benefits must be paid within 30 days.

- Ensure workers clearly understand their schedule and available breaks/time off.
- Ensure there is a system to correctly pay workers for any work stoppages and paid time off/breaks, at minimum in alignment with national and local laws.
- Ensure that any deductions for housing and other goods/services provided do not exceed the actual cost. Clearly communicate that all workers have a right to use or not to use services provided by Supplier.
- Establish a process for workers to contest their wages without fear of retaliation, e.g., through a grievance mechanism.
- In the case of retrenchment or contract termination, ensure that the worker receives all severance, social security, and other separation benefits.

Encouraged:

- Work to develop sophisticated systems to measure and monitor production plan capacity and output to avoid overtime hours.
- Create a system for wage transparency to ensure that workers within the same position are being paid a fair wage across Supplier's operations and understand the requirements for additional pay/increased wage.



HUMAN RIGHTS

Child Labor

Suppliers must not employ any persons under the age of 15, the applicable minimum age for employment, or the applicable age for completing compulsory education, whichever is highest. Suppliers must observe all applicable legal requirements as well as conditions as set out in the ILO Minimum Age Convention (No 138) for all workers under 18 years of age. Suppliers must have verification processes in place to ensure no recruitment of child labor.

Fundamental:

- Establish and communicate a minimum age policy that complies with local laws and the ILO Minimum Age Convention (No 138).
- Establish a system for young workers (i.e., workers between ages 15 – 18) that keeps track of their work schedule and position to ensure that young workers do not work overtime, do not perform work that can be harmful to their health and safety, and are not exposed to hazardous materials.
- Establish and maintain procedures to verify age during hiring process.
- Request and maintain copies of legal age documents for all workers, including photo ID. Note: it is not permissible to retain original identification documents such as passports.
- Do not allow workers to bring children to the workplace – alternative arrangements for child's care should be made.

Encouraged:

- Establish childcare facilities, in alignment with all applicable local laws, where needed to support workers that have no childcare alternatives.



Forced Labor and Human Trafficking

All Suppliers must ensure that no forced labor, including bonded, indentured, involuntary prison labor or slave labor is used, as defined in the ILO Forced Labor Convention (No. 29) and the Abolition of Forced Labor Convention (No. 105). Suppliers are expected to not charge recruitment fees as part of the application process or use fraudulent recruitment practices.

Fundamental:

- Observe the “Employers Pay” principle: Recruitment and placement fees must be paid by Supplier. Workers must not pay for any recruitment costs.
- Ensure employment terms are shared prior to employment to avoid fraudulent recruitment practices.
- Ensure contracts and other employment documents are offered in the language of the worker and are freely signed.
- Ensure all documentation is signed and migrant workers are briefed on policies, accommodations, and expectations of work and conditions of payment for return transportation prior to leaving their home country.
- Ensure foreign migrant worker contracts and local worker contracts are equal in terms of hours, wages, and benefits.
- Do not retain original worker documentation such as passports, birth certificates, or other personal documentation. Instead, make copies and return original documentation immediately to workers.
- Provide workers with access to safe, fireproof, and waterproof lockers to store their personal documents and valuables, and ensure workers have access to their keys at all times.
- Ensure that workers have free access and are informed of their right to freely enter and exit any supplier facility, including worksites and dormitories.
- Ensure workers are familiar with resignation policies and protocols. Resignation policies should, at minimum, follow local laws and include notice periods, a process to pay final wage payments including all back wages and overtime, and, for foreign migrant workers, processes on home transportation. Note that Supplier must pay for workers’ return transportation to home site/country.
- Ensure workers are paid timely, and that employee mobility is not restricted due to wage deposits, loan repayments, etc.

- Overtime must always be voluntary. Ensure workers are not penalized for refusing overtime hours. Unexpected fees and wage deductions are not allowed.
- Ensure workers always have access to lavatories and drinking water without asking for permission.
- Ensure food and lodging are not deducted from wages without consent.
- Ensure uniforms, tools, or other items required for work are paid for by Supplier.
- Ensure compliance with MGMRI’s Initiatives Against Human Trafficking.

Encouraged:

- Ensure that Supplier’s only purpose for interacting with a worker’s bank account is for the sole purpose of depositing wages (or as otherwise required by law).
- Establish a screening and evaluation process to review recruitment firms and recruiters, with particular attention to areas where the employment of foreign migrant workers is common.
- Require labor agents to disclose labor sources and share information with MGMRI for due diligence purposes.
- Ensure the protection of children through observing the Convention on Tourism Ethics, specifically Art. 5.2 and 5.3 which pay special attention to children in tourism, and the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism in addition to any other guidelines outlined by ECPAT.

HUMAN RIGHTS

Freedom of Association & Collective Bargaining

Suppliers must respect workers' right to associate, organize and bargain collectively in a lawful and peaceful manner without penalty, retaliation, or interference. Where workers are represented by a union, Suppliers are required to establish a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives.

Fundamental:

- Ensure hiring practices do not discriminate against union workers by refusing to hire them or terminating them based on union membership.
- Ensure all workers have the right to join, form, or not to join a labor union without fear of harassment and discrimination.
- When a collective bargaining agreement is in place, adhere to the legal terms.
- Ensure workers have the right to communicate with management (at least one other member in addition to direct supervisor) either individually or collectively about workplace concerns.

Encouraged:

- Establish direct lines of communications with union representatives for engagement and collaboration.
- Establish a good faith statement around bargaining.
- Maintain a record of all past and present collective bargaining agreements.



HUMAN RIGHTS

Worker Feedback and Grievance Mechanisms

Suppliers must establish a confidential, unbiased, non-retaliatory complaint procedure that enables workers to raise concerns without fear of intimidation. Retribution or retaliation taken against any individual who has sought advice or reported a complaint, including questionable behavior or a possible violation of this Code of Conduct, is prohibited. Violations can be reported to MGMRI Ethics and Compliance Hotline by calling from within the United States (877) 597-7462 or visiting www.mgmethics.ethicspoint.com.

Fundamental:

- Establish a complaint procedure or grievance mechanism that is confidential, unbiased, and non-retaliatory, with clear processes on how grievances need be handled and escalated.
- Ensure multiple channels are available to submit anonymous grievances, such as a third-party managed hotline, email address, human resources person, etc.
- Communicate existence of grievance mechanisms and provide clearly posted signage with grievance contact information within workers languages.
- Include information about grievance mechanisms and systems of collecting worker feedback into trainings.
- Ensure that once a grievance is filed, there is clear and transparent communications with workers about the procedure, process, and timeline of grievance handling.
- Maintain records of all grievances, how they have been handled and remedy provided.
- Ensure policies and practices are in place to protect the identity of workers reporting and that limited information is shared only with parties on a need-to-know basis.
- Communicate the MGMRI Ethics and Compliance Hotline to all workers.

Encouraged:

- Create and provide examples/samples of the grievance process to share with workers to help understand how the grievance mechanism can be used.



HEALTH, SAFETY & ENVIRONMENT

Health & Safety

Suppliers must ensure that they have a safe and healthy work environment that operates in compliance with all applicable laws and regulations related to workplace conditions. Suppliers are required to maintain a productive workplace by minimizing the risk of accidents, injury, and occupational diseases. Suppliers must ensure facilities have, including but not limited to, accessible and adequate bathrooms, potable water, sanitary food preparation and eating facilities, ventilation, lighting, and temperature control. If housing is provided, living conditions must be clean, safe, and reasonable. Suppliers should also include appropriate controls, safe procedures, preventative maintenance, and appropriate protective equipment. Suppliers must take necessary steps to ensure that sites are structurally safe and well maintained. Fire exits must remain accessible and unobstructed, and safety equipment, evacuation plans, and periodic evacuation drills should be provided.

Fundamental:

- Ensure all dormitories, living facilities, and canteens, as well as working environments are safe and hygienic, including:
 - No indications of structural disrepair,
 - Proper construction certifications/permits/reports are available,
 - Building safety inspections are completed as indicated by laws or industry practice, whichever is higher,
 - Clearly posted signs alerting workers to emergency exits, maximum occupancy limit, etc.,
 - Safe usage of machines and equipment including but not limited to, proper training for all relevant workers, regular inspections, proper storage, and maintenance,
 - Proper disposal and management of chemical and hazardous materials,
 - Training for workers on safe ways of using designated hazardous materials/chemicals,
 - Emergency stations (e.g., eye washing stations and showers) are accessible and workers are trained on proper use,
 - Emergency plans are clearly communicated,
 - Chemicals and storage are properly marked,
- Access to clean drinking water and toilets,
- Appropriate lighting and comfortable temperature,
- Segregated sleeping for dorms / appropriate privacy in all restrooms,
- All facilities associated with Supplier are cleaned regularly,
- Ensure a proper fire safety protocol is implemented, including proper signage around emergency protocols, regular fire and safety drills, access to fire extinguishers, and properly installed and working fire alarms.
- Maintain all records regarding building safety, including fire and electrical safety certificates, licenses, and inspections as according to law.
- Provide workers with necessary personal protection equipment (PPE) based on general as well as job-specific requirements, such as: face and eye protection, face masks, safety shoes or boots, head protection, gloves, etc.
- Provide training on how to properly use, maintain, and dispose of PPE.
- Ensure that the necessary medical care and staff are on-site as required by national and local laws. If no requirement exists, ensure that at least a well-stocked first aid kit is available per every 100 workers.
- Develop and maintain a system for tracking injuries and risks related to the workplace and take appropriate action to rectify issues.
- Create a protocol that allows workers to refuse to work under unsafe conditions without fear of retribution and that appropriate action is taken to record and quickly rectify.
- Ensure food preparation areas are maintained in a sanitary condition and food is properly stored based on perishability and temperature sensitivity.

Encouraged:

- Review OSHA guidance and develop applicable emergency preparedness protocols for health/safety and natural disaster crises.
- Hold periodic dialogues with workers around workplace safety concerns and take appropriate next steps to develop a culture of safety.
- Designate a staff member responsible for overseeing all health and safety concerns in all facilities.
- Ensure all facilities have a safe and clean nursing room that is compliant with national or local laws.

HEALTH, SAFETY & ENVIRONMENT

Animal Welfare

Suppliers must comply with local and international regulations and standards on the ethical, humane and legal treatment of animals, including the “Five Freedoms of Care” as endorsed by the World Organization for Animal Health. This includes freedom from thirst, hunger, and malnutrition; freedom from fear and distress; freedom from heat stress or physical discomfort; freedom from pain, injury, and disease; freedom to express normal patterns of behavior. Suppliers must also uphold applicable MGMRI policies related to animal welfare.

Fundamental:

- Ensure alignment with animal welfare standards as indicated by the Five Freedoms of Care.
- Ensure there is no visitor interactions with animals in entertainment, that include:
 - Animal fights of any kind,
 - Trophy hunting and canned hunting.
- For animals used in entertainment, ensure the intended use of the animals is respectful and priority is given to the safety of the animals, guests, and workers.
- Ensure all animal products are verified as in compliance with a third party such as the Animal Welfare Certification from Global Animal Partnership.
Note: MGMRI Policy on Cage-Free Chickens requires chicken suppliers to have a certification from Global Animal Partnership.

Encouraged:

- Ensure animal welfare practices are aligned with industry partners such as the American Meat Institute Recommended Animal Handling Guidelines for slaughterhouses, National Dairy FARM Program for dairy, We Care for pig farming, The American Sheep Industry’s Sheep Care Guide for sheep, and National Turkey Federation’s Standards of Conduct and Animal Care Guidelines.
- Ensure there is no animal testing within supplier materials, raw material suppliers, manufacturers, or agents.
- Use the Five Domains Model in addition to the Five Freedoms of Care. Under this model, all animals undergoing human-animal interaction have the right to:
 - Good nutrition,
 - Safe and comfortable environment,
 - Good health,
 - Engaging behavior,
 - Positive mental state,
- Ensure all animal products such as down and feathers are ethically sourced through verifiable traceability systems.
- Include animal welfare and conservation education into animal interactions including shows and animal tourism wherever possible.



HEALTH, SAFETY & ENVIRONMENT

Environment

The Code does not include specific requirements on environmental performance beyond compliance with all applicable environmental laws and regulations. However, MGMRI recognizes the impact on the environment of our operations and supply chain. The following actions are recommended.

Encouraged:

Environmental Management

- Establish a governance structure to address environmental-related risks and opportunities.
- Develop an environmental policy and implement an environmental management system across the organization.
- Review the MGMRI Environmental Policy and contribute to MGMRI's environmental goals.

Climate

- Conduct a climate risk assessment to identify and assess climate-related risks.
- Set climate target(s) that align with the goals of the Paris Agreement and seek approval from the Science-Based Targets Initiative.
- Create a transition plan to align business operations with climate targets.

Energy

- Implement energy-efficient practices in operations, including energy-efficient equipment and processes to avoid energy waste.
- Consider transition to renewable energy sources to lower greenhouse gas emissions.

Water

- Conduct a water use assessment to understand the extent to which water is used in the direct production of goods and services.
- Build capacities to analyze and respond to watershed risk, particularly in regions with high or extremely high baseline water stress.
- Implement a water stewardship strategy that aligns with local water issues.

Materials & Waste

- Identify and manage chemicals and other materials that pose a hazard to the environment if released to ensure safe handling, movement, storage, recycling or reuse, and disposal.
- Implement programs to increase resource efficiency, improve diversion and reduce the volume of waste sent to landfill.
- Explore sustainable packaging solutions and implement programs to reduce plastic waste.

Biodiversity

- Complete a biodiversity risk assessment to identify nature-related dependencies, impacts, risks and opportunities.
- Avoid operational activities near sites containing globally or nationally important biodiversity.
- Eliminate deforestation and land conversion from the direct production of goods and services.



SUPPLIER ENGAGEMENT

Subcontracting

Supplier may only use Subcontractors to the extent authorized in writing by MGMRI and only pursuant to the terms of Supplier's agreement with MGMRI. Notwithstanding the foregoing, (i) Supplier will remain fully and solely responsible and liable for proper performance of all Supplier obligations under its Agreement, and (ii) Supplier will ensure that all such Subcontractors are informed of and agree in writing to comply with all applicable terms and conditions of this Code of Conduct.

Fundamental:

- Ensure that all subcontractors who will provide goods or services to MGMRI are disclosed to MGMRI, and where applicable approval is obtained prior to utilizing such subcontractors.
- When requested, supplier must be prepared to provide subcontractor locations, materials and services used in MGMRI products.
- Ensure subcontractors are informed about, and adhere to, the MGMRI Supplier Code of Conduct.

Encouraged:

- Share the Supplier Guide with subcontractors to support their alignment with the MGMRI Supplier Code of Conduct.
- Provide subcontractors with developed trainings and materials to ensure all workers are trained in accordance with MGMRI's standards.



SUPPLIER ENGAGEMENT

Legal and Ethical Sourcing

MGMRI is committed to the legal and ethical sourcing of its products and services and will not knowingly make purchases made with illegally harvested, produced, or traded products and services; nor will it knowingly make purchases associated with forced or involuntary labor, in whole or in part.

Fundamental:

- Ensure transparency in the supply chain through traceability efforts including but not limited to, keeping record of sources, updating MGMRI requested supplier databases and transparency systems, and participating in regular audits.
- Comply with all applicable trade sanctions and regulations as outlined in both US, national, and local law including the California Supply Chain Transparency Act, Dodd-Frank Act, and Uyghur Forced Labor Prevention Act if applicable. Ensure compliance with all outlined reporting and disclosure requirements.

Encouraged:

- Establish systems for Tier 2 tracing and transparency, via document collection, supplier mapping, raw materials certifications, etc.
- Develop and implement responsible sourcing policies specifically for materials of high concern, such as forestry products, palm oil, etc.
- Request or establish third-party certification for high-risk products to improve traceability and transparency (e.g., RSPO-certified palm oil, organic, Fair Trade, Rainforest Alliance, etc.).



SUPPLIER ENGAGEMENT

Management Systems

Suppliers must ensure that the requirements of this Code are consistently implemented, adequately monitored, and clearly communicated to workers and supervisors in a language that they understand.

Fundamental:

- Participate in regular audits and self-reporting practices as requested by MGMRI.
- Maintain a record of past audits and documentation for 12 months or according to national and local laws, whichever is longer.
- Ensure Code of Conduct, company policies, trainings, timesheets, grievance mechanisms and other materials are provided to workers in a language they understand.
- Ensure management staff understands responsibility to implement the Code, including monitoring and implementation of laws and regulations.

Encouraged:

- Develop standard operating procedures (SOPs) as necessary to ensure consistencies in how policies are implemented and enforced.
- Build systems to help measure compliance trends, worker survey results, auditing, key metric tracking, and other data related to the outlined areas of focus in MGMRI's Code.
- Establish trainings for all workers (including contract workers), supervisors and management and ensure all workers are trained on an annual basis. Training should also be provided to new hires as part of onboarding. Topics for trainings may include:
 - Discrimination,
 - Harassment & Abuse,
 - Wages, Benefits, & Hours,
 - Child Labor,
 - Forced Labor and Human Trafficking (including child trafficking),
 - Freedom of Association & Collective Bargaining,
 - Worker Feedback and Grievance Mechanisms,
 - Health & Safety,
 - Animal Welfare,
 - Legal and Ethical Sourcing,
 - Supplier Code of Conduct,
 - Legal Compliance,
 - Corruption & Bribery,
 - Conflict of Interest,
 - Fair Competition & Marketing,
 - Monitoring & Compliance.



ETHICS & COMPLIANCE

Legal Compliance

Suppliers must act in accordance with all applicable international, federal, state, and local laws and regulations. All government-required licenses and certificates must be retained and maintained. Suppliers must be honest, direct, and truthful in discussions with regulatory agency representatives and government officials.

Fundamental:

- Maintain all licenses and certificates as required by law and ensure that they are valid and match with actual operation details.
- Ensure there are no errors or omissions in government permits, certificates, or other facility records.

Encouraged:

- Perform regular risk assessments to identify potential compliance risks and undertake action as appropriate.



ETHICS & COMPLIANCE

Corruption & Bribery

Suppliers, their representatives, and workers, must neither engage in nor tolerate association with any form of corruption, bribery, extortion, or embezzlement. Suppliers must not participate in bribes or kickbacks of any kind, whether dealing with public officials or individuals in the private sector. Suppliers, their representatives and workers must follow all anti-corruption and anti-money laundering laws, as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations, including the US Foreign Corruption Practices Act (FCPA) and local laws.

Fundamental:

- Ensure compliance with all laws including the United States Foreign Corruption Practices Act.
- Ensure policies and communications reflect that under no circumstances should bribes be offered to or accepted by any party.
- Maintain accurate and transparent books and records regarding payments to all parties.

Encouraged:

- Ensure that workplace policies and strategies prevent corruption & bribery in the long-term including regular trainings, ensuring sufficient wages, policies, sharing best practices around gift giving/receiving with all workers, etc.
- Build protocols that continually review ongoing systems to ensure best practices and policies to mitigate and prevent corruption & bribery.



ETHICS & COMPLIANCE

Conflict of Interest

All Suppliers must inform MGMRI of any actual, perceived, and potential conflicts of interest that arise from business or personal relationships with MGMRI customers, suppliers, business associates, workers, or competitors via the Ethics and Compliance Hotline. Please call (877) 597-7462, or visit mgmethics.ethicspoint.com.

Fundamental:

- Ensure a system is in place to disclose or report all conflicts of interest in advance.
- Develop training, decision flowcharts, and other materials to help identify and prevent potential conflicts of interest.

Encouraged:

- Establish an ethics officer to assist in decisions surrounding all conflicts of interest.



ETHICS & COMPLIANCE

Fair Competition & Marketing

MGMRI succeeds by competing fairly and dealing truthfully with customers and Suppliers, without manipulation or concealment. Suppliers must uphold fair business standards in advertising, sales, and competition. Suppliers are required to comply with applicable antitrust and competition laws that prohibit agreements between competitors that affect prices, costs, terms, or conditions of sale.

Fundamental:

- Ensure no antitrust laws are violated nor participate in activities that give the appearance of restricting trade or competition.
- Document and inform MGMRI of antitrust concerns.



ETHICS & COMPLIANCE

Monitoring & Compliance

Suppliers must allow MGMRI representatives (including third parties, such as auditors) access to facilities and documentation, whether announced or unannounced, for evaluation of compliance with this Code of Conduct. Suppliers must be honest, direct, transparent, and truthful in all discussions with MGMRI representatives. Suppliers are expected to take necessary corrective actions to promptly remediate any non-compliance with this Code of Conduct. Suppliers will maintain all documentation that may be needed to demonstrate compliance with this Code of Conduct.

Fundamental:

- Allow accessors full access to facility premises, employees, and records.
- Do not attempt to influence the results of an audit. For example, bribing assessors or coaching /selecting workers to provide false or misleading responses.
- Develop a system for tracking, reporting, and addressing all non-compliances.

Encouraged:

- Define and implement a policy for social accountability and appoint a member of senior management to ensure compliance with MGMRI Code of Conduct and all national and local laws.



CONFIDENTIALITY, PRIVACY & DATA SECURITY

Suppliers must keep all their supply agreements and arrangements with MGMRI and its affiliates confidential, except to the extent a particular disclosure is required by applicable law or by a valid court order or other legal process of an administrative agency or other government body. Suppliers must protect MGMRI customers', workers' and clients' data, information (including personal information), privacy and confidentiality and process such information and data in accordance with the terms of the agreement (if any) between Supplier and MGMRI as well as applicable law and legal requirements. Unless otherwise stated in an executed agreement, Suppliers may only collect, use, retain or share information needed to fulfill their contractual obligations to MGMRI, must not disclose (including selling and sharing) personal information, and must immediately notify MGMRI of any breach or suspected data or privacy breach. Subject to applicable law, Suppliers must refrain from disclosing to any other outside parties any written or verbal confidential information provided by the Company without first obtaining written permission from an authorized Company representative. Supplier must maintain reasonable and appropriate technical, organizational, and physical measures to protect data and information that it collects, accesses, stores, processes or receives from, or on behalf of, MGMRI. Suppliers shall collect, use, protect, and disseminate information only in accordance with appropriate and/or applicable privacy legal requirements and other standards including, but not limited to, the General Data Protection Regulation ("GDPR"), the California Consumer Privacy Act ("CCPA"), and other local, state, federal or international privacy and data security laws, regulations and requirements.

MGMRI reserves the right to amend or modify this Supplier Guide.

Violations of the Supplier Code of Conduct and other forms of misconduct can be reported to the MGMRI Ethics and Compliance Hotline by calling (877) 597-7462, or visiting mgmethics.ethicspoint.com

