



MTM ENGINEERING

Part of **MTM GROUP**

SUPPLIER CODE OF CONDUCT

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About MTM Engineering

Our Mission

We deliver the turnkey critical path in power and communication services, in projects across Europe and beyond.

Our Values



People

We look after our people and our people look after our company.



Integrity

We say what we do, and we do what we say.



HSEQ

Our HSEQ culture is part of our MTM Fabric, we believe in safe work and quality delivery every time.



Schedule

Our commitment is to deliver on time, every time.



Innovation

We believe in investing in new systems to bring value to our customers time and time again.

Introduction

MTM Engineering is committed to upholding the highest standards of business and ethical behaviour, fulfilling our responsibilities to the communities we serve, and creating long-term value for all stakeholders in a socially and environmentally sustainable manner.



Purpose & Scope of the Code

This Code outlines our expectations of supply chain partners regarding their operations and conduct. It applies to MTM Engineering (hereinafter referred to as 'MTM'). To ensure responsible procurement, we will engage in dialogue with suppliers and review relevant supplier documents. All MTM suppliers must adhere to this Code and comply with relevant laws, regulations, and MTM's policies and procedures.

The term 'Supplier,' as used in this Code, refers to suppliers, vendors, contractors, consultants, agents, and other providers of goods and services who conduct, or seek to conduct, business with MTM worldwide. Suppliers are responsible for ensuring compliance with this Code by their own suppliers, contractors, and approved subcontractors when providing goods and services to MTM.

This Code applies to all suppliers of MTM and its subsidiaries, representing or acting on behalf of MTM.



Business Conduct Standards

To uphold our reputation as a responsible business, MTM adheres to the highest standards in its operations.

Consequently, we require our suppliers to engage in business responsibly, with integrity and transparency. Moreover, we expect our suppliers to treat all employees with fairness, honesty, and respect, and in full compliance with the requirements detailed as follows:

Laws & Regulations

When providing products and services to MTM, suppliers are required to comply with all relevant local and national laws, rules, regulations, and requirements. This includes complying with all tax laws and regulations, as well as adhering to the Core Conventions of the International Labour Organisation (ILO).

It is the suppliers' responsibility to uphold and implement these standards throughout their supply chains. Suppliers must acquire the necessary knowledge to ensure compliance with the laws and regulations pertinent to their services and areas of responsibility, and to understand the risks associated with non-compliance.

Data Protection

Suppliers must adhere to relevant data protection laws and regulations and avoid any actions or omissions that could cause MTM to violate these laws and regulations.

Suppliers must protect personal data processed on behalf of MTM or its clients by implementing suitable technical and organisational measures. This includes safeguarding personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access, especially when data is transmitted over a network, and from all other unlawful processing activities. Suppliers are required to promptly report any such incidents to MTM.

Conflicts of Interest

Suppliers are obligated to avoid any circumstances in which their interests, financial or otherwise, might conflict with the duties they are contracted to perform for MTM and its clients. It is essential that MTM suppliers ensure no other interests interfere with their obligation to act in MTM's best interests.

Confidential Information

Suppliers are obligated to protect confidential information. They must not disclose any confidential information of MTM to anyone except those who have a legitimate need to know. Such information encompasses all data provided to a supplier or its subcontractors, as well as any business-related information of MTM and its clients that is obtained or accessed in the course of fulfilling duties for MTM. The use of MTM's confidential information is strictly limited to the normal execution of the contracted services.



Business Ethics

Aligned with our dedication to uphold proper standards of professionalism and ethical behaviour in all business dealings, MTM does not condone any form of bribery or corruption. Our suppliers must refrain from engaging in any bribery or corruption and must not violate MTM's Bribery and Corruption policies or the Ireland Criminal Justice Act 2021.

Suppliers and business partners must not promise, offer, or provide any improper advantage, either directly or indirectly, to any individual or entity, including government officials or entities under government control. MTM employees are prohibited from accepting such advantages, and we expect our business partners, suppliers, and third parties to adhere to the same standard in all business transactions.

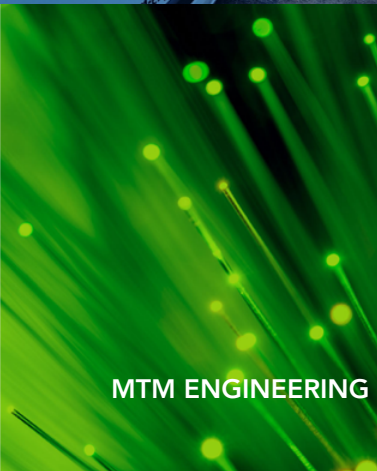
As a multinational corporation, we operate across various countries and communities, respecting and advocating for human rights within each. We commit to the UN Guiding Principles on Business and Human Rights in our interactions with colleagues, partners, clients, and suppliers. We commit to adhering to local laws and regulations in all jurisdictions where we operate, in line with the principles and standards outlined in our Human Rights Policy.

Our suppliers are an essential and integral part of our operations and key to our future success. We maintain the same ethical standards for our suppliers as we do for ourselves, insisting that they comply fully with all relevant laws, rules, and regulations. We are dedicated to collaborating with our suppliers and stakeholders to eradicate slavery, human trafficking, child labour, and any other human rights violations.

All forms of modern slavery are prohibited, including:

- **Child labour** - Underage and child labour are unacceptable.
- **Forced labour** - We reject all forms of forced or compulsory labour, including indentured, bonded, involuntary prison, military, or any form of human trafficking or modern slavery.

We urge suppliers to promptly report any instances of child labour, forced labour, slavery, or human trafficking in their operations or supply chains to MTM.



Freedom of Association

Suppliers must honour the workers' rights to either associate with or refrain from associating with any group, in line with all relevant local and national laws pertaining to freedom of association and collective bargaining. Suppliers must not obstruct or discriminate against workers who opt to join such groups. In instances where national law limits the right to freedom of association and collective bargaining, suppliers should promote, rather than impede, the development of independent and free means for association and bargaining.

Discipline & Grievances

Suppliers are required to establish a grievance and disciplinary mechanism for workers and their organisations. In Ireland, these mechanisms must adhere to the Code of Practice on Grievance and Disciplinary Procedures. Outside Ireland, suppliers should comply with any equivalent local requirements.

Working Hours

Suppliers are required to ensure that working hours comply with national laws and standards. Workers should not be expected to work beyond the hours stipulated in applicable working time legislation or other national legal limits unless the employee has voluntarily opted out, as evidenced by appropriate written documentation.

Wages & Benefits

Wages and benefits should comply with legal minimums and industry norms, with no unauthorised deductions.

Occupational Health & Safety

Suppliers must maintain safe and hygienic conditions for workers at their workplaces. Clear protocols should be in place to guarantee compliance with regulated occupational health, safety, and well-being standards. Facilities must be constructed and maintained in compliance with all relevant laws and regulations. If accommodations are provided, they must be clean, safe, and capable of meeting the basic needs of workers while respecting their dignity. Suppliers must also ensure that proper exits, procedures, and equipment are in place to handle emergency situations effectively. Additionally, adherence to the MTM Occupational Health and Safety policy is a mandatory requirement for suppliers.

Discrimination

We advocate for an inclusive and diverse workplace, ensuring equal opportunities for all employees. It is imperative that all workers are treated equitably and without discrimination in any aspect of employment.

Suppliers are prohibited from discriminating against employees based on age, gender, sexual orientation, race, ethnicity, colour, disability, religion, political affiliation, union membership, national origin, marital status, or pregnancy during recruitment or employment processes. Suppliers must also ensure a work environment free from harassment or the threat thereof.

All forms of harassment, whether physical, psychological, sexual, or verbal, are strictly forbidden and will not be tolerated.

Environment

Suppliers are required to establish transparent procedures to comprehend, quantify, manage, and annually report the direct and indirect environmental impacts and carbon footprint of their goods and services to MTM. They must adhere to the MTM Environmental Policy.

Supply Chain Risk Management

We anticipate that suppliers will engage fairly and maintain sufficient oversight over subcontractors and suppliers within their supply chain. Suppliers should not inappropriately transfer risk to subcontractors or claim to control risks that are more effectively managed by others.

All parties are expected to be open and transparent in identifying, evaluating, and mitigating risks associated with their supplied goods or services. Additionally, they should communicate any intelligence regarding supply chain risks. This approach will help mitigate significant commercial and operational risks, such as the repercussions of losing a crucial supplier.



Compliance

Suppliers are required to demonstrate adherence to the MTM Supplier Code of Conduct, which entails providing documented proof and allowing MTM or an appointed agency to perform audits. These audits may encompass facility inspections, scrutiny of supplier records and business practices, and employee interviews.

In the event deficiencies are identified, the supplier must take the necessary steps within an acceptable timeframe to correct any deficiency to MTM's satisfaction.

Reporting Concerns (Whistleblowing)

Suppliers are urged to report any suspicions or concerns regarding MTM work-related misconduct or unethical behaviour, such as breaches of rules, laws, or regulations. Concerns should be reported directly to the MTM Human Resources Department, or to the supplier's relationship manager.

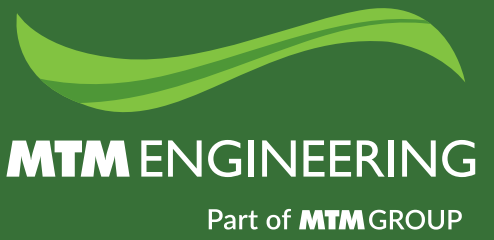
MTM will not tolerate any retaliation against individuals reporting concerns in good faith. All reports will be taken seriously, and a confidential investigation will be conducted as necessary. Should an investigation require the supplier's assistance, their full cooperation is expected.

While direct reporting through the aforementioned channels is preferred, suppliers, their employees, and subcontractors may also raise concerns with the appropriate regulators in accordance with local law. In Ireland, concerns may also be raised with the Protected Disclosures Commissioner (PDC), either simultaneously or consecutively.

For any inquiries regarding MTM's whistleblowing policy, please contact the MTM Human Resources Department. If suppliers are found in violation of the stipulations of this Code, MTM reserves the right to terminate any related agreements or business relationships.

Amendments

MTM may revise or modify this document periodically to comply with legislation and ensure best practices.



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