

## Supplier/Partner Code of Conduct

### Overview

Magic-Wrighter offers best in class products and services to its customers — financial institutions, businesses, and consumers. In offering these products and services, we pride ourselves on conducting business ethically and with integrity. Conducting business in this manner is at the heart of the Magic-Wrighter family and is evidenced by the way we have embedded our shared values, including ‘Doing well by doing right’ into all aspects of our business. With over 37 years serving the needs of our customers, our reputation is one of our most valuable assets, only exceeded by the power of our people.

### Code of Business Ethics

As we endeavor to lead with integrity, we are committed to selecting and doing business with suppliers and partners who share similar principles and our commitment to uphold the highest standards of quality, excellence, safety, legal compliance, and respect for human rights. This Supplier/Partner Code of Conduct defines our requirements for suppliers and partners in terms of their responsible business conduct. As a condition of doing business with Magic-Wrighter, our suppliers and partners are expected to become familiar with and agree to operate in a manner which is consistent with all applicable laws and regulations and the requirements laid out in the Supplier/Partner Code of Conduct.

The Supplier/Partner Code of Conduct applies to all suppliers and partners that provide services, raw materials, finished goods, or other products to Magic-Wrighter. The provisions of the Supplier/Partner Code of Conduct are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a supplier or partner and Magic-Wrighter. We expect suppliers and partners to hold their services and supply chain, including subcontractors and any third-party agents, to the same standards contained in this Supplier/Partner Code of Conduct. The Supplier/Partner Code of Conduct does not create any third-party beneficiary rights or benefits for suppliers, partners, subcontractors, their respective employees, or any other party. By acceptance of any service request from Magic-Wrighter, the supplier or partner acknowledges its acceptance of the Supplier/Partner Code of Conduct and its intention to comply with the Code’s requirements.

### Labor and Human Rights

We expect our suppliers and partners to treat people with respect and dignity and conduct their activities in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights. This principle is supported by the following elements:

#### Freely Chosen Employment

Suppliers and partners must not use any form of slave, forced, bonded, indentured, involuntary prison labor, or human trafficking. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

#### Freedom of Association

We expect our suppliers and partners to respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join works councils. Workers must be able to communicate openly with management regarding working conditions without retaliation, threat of reprisal, intimidation, or harassment.

## **Supplier/Partner Code of Conduct**

### **Labor and Human Rights (continued)**

#### **Employment Status**

Suppliers and partners must employ workers who are legally authorized to work in their location and facility and are responsible for validating employee's eligibility to work status through appropriate documentation.

#### **Wages, Benefits, and Working Hours**

Suppliers and partners must pay workers according to applicable wage laws, including minimum wages, overtime hours, and mandated benefits. Suppliers and partners must, in a timely manner, communicate to workers the basis on which they are being compensated. Suppliers and partners are also expected to communicate with workers whether overtime is required and the wages to be paid for such overtime.

#### **Child Labor**

Suppliers and partners must not use any form of child labor in the production or distribution of their goods or services. A "child" is any person under the minimum legal age for employment where the work is performed, under the age of 15, or under the age for completion of compulsory education, whichever is higher.

#### **Non-Discrimination**

We expect our suppliers and partners to provide equal employment opportunity to employees and applicants for employment without regard to age, sex, race, color, ethnicity, citizenship, national origin, sexual orientation, gender identity, creed, religious preference or belief, disability, marital/family status, or any other characteristic protected by law, so long as the essential functions of the job can be performed with or without reasonable accommodation.

#### **Harassment-Free Workplace**

We expect our suppliers and partners to treat others with respect, meaning that harassing conduct is not acceptable in any form. While harassment may have different definitions, Magic-Wrighter considers it to include any unwelcome behavior, sexual or non-sexual, toward another person that has the purpose or effect of creating an intimidating, hostile, or offensive work environment.

#### **Use of Drugs and Alcohol**

Suppliers and partners must not possess, use, purchase, or sell illegal drugs during the execution of work for or on behalf of Magic-Wrighter, or while on Magic-Wrighter property, including being under the influence of medication prescribed for someone else. Similarly, work for or on behalf of Magic-Wrighter must never be performed while under the influence of alcohol.

#### **Health and Safety**

We expect our suppliers and partners to provide a safe and healthy working environment. This principle is supported by the following elements:

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### Health and Safety (continued)

#### Occupational Health and Safety

We expect our suppliers and partners to ensure that their activities are safe for the health of their employees, their own contractors, the local community, and users of their products and services. Suppliers and partners must comply with applicable safety and health laws, regulations, policies, and procedures.

Suppliers and partners should have procedures and systems in place to prevent, manage, track, and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of employees to work.

#### Emergency Preparedness and Response

Suppliers and partners should identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures. Such plans and procedures should focus on minimizing harm to life, the environment, and property. Suppliers and partners should review and, if appropriate, update such plans and procedures annually or more frequently, if necessary.

#### Industrial Hygiene

Suppliers and partners should identify, evaluate, and control any worker exposure to chemical, biological, and physical agents. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, employees' health is to be protected by appropriate personal protective equipment programs.

#### Physically Demanding Work

Suppliers and partners should identify, evaluate, and control employee exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

#### Machine Safeguarding

Suppliers and partners should evaluate production and other machinery for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to employees.

#### Health and Safety Communication

Suppliers and partners should provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information must be clearly posted in all facilities.

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### Environment

We expect our suppliers and partners to operate with sustainable business practices and mindful, responsible use of environmental resources including engaging in reuse and recycle programs, and where possible, avoid the use of hazardous materials. This principle is supported by the following elements:

#### Environmental Authorizations

Suppliers and partners must comply with all applicable environmental regulations, laws, codes, and other governmental requirements and authorizations. Suppliers and partners must maintain and follow all associated operational and reporting requirements of required environmental permits, licenses, information registrations, and restrictions.

#### Sustainability

We expect suppliers and partners to minimize the unnecessary use of materials, resources, and energy to reduce their environmental footprint. When requested by Magic-Wrighter, suppliers and partners are expected to provide documentation highlighting their progress on clean manufacturing processes, waste minimization, sustainable practices, and environmental performance standards.

### Ethical Business Practices

We expect our suppliers and partners to conduct their business in an ethical manner and act with integrity. This principle is supported by the following elements:

#### Compliance With Law

Suppliers and partners must comply with applicable laws and regulations in the countries and jurisdictions in which they operate. The Supplier/Partner Code of Conduct applies to activities in the locations where suppliers' goods are produced, where any related services are performed, and where the goods enter the supply chain. Where differences or conflicts in standards arise, the highest standard will apply.

#### Accurate Books and Records

Suppliers and partners are expected to maintain accurate and transparent books, records, and accounts to demonstrate compliance with applicable laws, regulations, and this Supplier/Partner Code of Conduct. All financial books and records should conform to generally accepted accounting principles. Suppliers and partners must not hide, fail to record, or make false entries in any book or record.

#### Anti-Corruption and Bribery

Suppliers and partners must not participate in any acts of corruption, extortion, or embezzlement. Suppliers and partners must not either directly or indirectly pay anything of value to a government official or other party in a prospective or existing business relationship with Magic-Wrighter in order to give or receive a bribe under any circumstances.

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### Ethical Business Practices (continued)

#### Anti-Corruption and Bribery (continued)

A bribe can be anything of value and is not limited to a cash payment. It can also include gifts, travel, excessive meals or entertainment, offers of employment, and charitable or political contributions.

#### Antitrust and Competition Law

Suppliers and partners must comply with all domestic and international antitrust and competition laws and regulations to avoid any action that would illegally restrain or thwart the efforts of competitors. These laws prohibit practices in restraint of trade, such as price fixing, bid rigging, group boycotting, territory or customer allocation, and offering or taking bribes and accepting kickbacks.

#### Conflicts of Interest

Suppliers and partners are expected to avoid actual conflicts of interest and minimize the possibility or appearance of conflicts of interest. A conflict of interest arises when judgment can be influenced, or might appear to be influenced, by the possibility of personal benefit. When providing products or services on Magic-Wrighter's behalf, suppliers' and partners' actions should be based on sound business judgment, not motivated by personal gain. Any situation that creates, or appears to create, a conflict between a personal interest and Magic-Wrighter's interests should be avoided.

#### Gifts and Entertainment

Magic-Wrighter competes on the merits of its products and services and does not use the exchange of business gifts and entertainment to gain an unfair competitive advantage. We expect the same of our suppliers and partners in the offering or receipt of any gift or business courtesy, including cash and cash equivalents. Suppliers and partners must not offer any gift or entertainment with the intention of trying to influence the decision-making objectivity of a Magic-Wrighter employee or director.

In any business relationship, our suppliers and partners must ensure that the offering or receipt of any gift or entertainment is permitted by law and regulation; does not violate the rules and standards of the recipient's organization; is consistent with reasonable marketplace customs; and will not adversely impact the reputation of Magic-Wrighter.

#### Intellectual Property & Confidential Information

Suppliers and partners requiring the exchange of confidential information with Magic-Wrighter are required to execute a confidentiality agreement with Magic-Wrighter in advance. Exchange of confidential information is limited to that required to fulfill contracted performance requirements.

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### **Ethical Business Practices** (continued)

#### **Intellectual Property & Confidential Information** (continued)

Suppliers and partners are expected to protect all confidential information, including personal information disclosed to or collected from or on behalf of Magic-Wrighter, and take all necessary technical, procedural, and administrative safeguards to prevent its unauthorized access, use, disclosure, or loss; including an unauthorized communication and/or publication of information acquired from or on behalf of Magic-Wrighter.

#### **Data Privacy and Security**

Suppliers and partners must abide by applicable data privacy laws and regulations when handling confidential information, including statutes requiring notification of breaches or unauthorized disclosure of confidential information.