

MTI SUPPLIER CODE OF CONDUCT

DOCUMENT CONTROL AND REVISION

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MAIN PRINCIPLES FOR SUPPLIERS

Operating with integrity governs our approach and therefore our aspiration to be recognised by our stakeholders as an organisation which is a responsible corporate citizen in all our relationships.

We are fully aware of the responsibility we bear toward our customers, employees and the communities in which we work. Thus, we have given ourselves a strict set of ethical values to guide us in our business dealings.

We expect all our suppliers and companies who do business with MTI, to adhere to the same ethical principles. For this purpose, MTI has drawn up this supplier code of conduct, which sets out the codes of conduct and the standards we expect from those suppliers and companies.

LAWS AND ETHICAL STANDARDS

LABOUR AND HUMAN RIGHTS

The supplier shall comply with all laws applicable to its business. The supplier should support the principles of the United Nations Global Compact, the UN [“Universal Declaration of Human Rights”](#) as well as the [“1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work”](#), in accordance with national laws and practice. This especially applies to:

Child labour and Young Workers

Suppliers shall ensure that no underage labour has been used in the production or distribution of goods and services to MTI. A child is any person under the minimum employment age according to the laws of the country where the product (or parts of) or services are sourced from, or in the absence of law under the minimum age for completed mandatory education.

Forced labour

Suppliers will not use or tolerate in their supply chain any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour or any form of human trafficking.

All work must be conducted voluntarily and without threat of any penalty or sanctions.

No employee government issued identification, passports or work permits will be retained by the supplier as a condition of employment.

Workers’ rights to leave the workplace after their shift or to terminate their employment after reasonable notice and receive owed salary must be recognised by the supplier. This applies to local or migrant employees. The supplier shall publish a modern slavery statement pursuant to section 54(1) of the Modern Slavery Act 2015, where applicable.

Wages, Benefits and Working Hours

The supplier shall comply with the respective national laws and regulations regarding working hours, wages and benefits.

Discrimination, Harassment and Bullying

An inclusive and diverse work environment is encouraged, with equal opportunities for all workers.

All employees must be treated fairly and not discriminated against in any form of employment. Suppliers must not discriminate against any employee based on age, gender, sexual orientation, race, ethnicity, colour, disability, religion, political affiliation, union membership, national origin, marital or pregnancy status during any recruitment or employment activities.

Suppliers must commit to a workforce free of any harassment or threat of harassment. Any forms or threats of harassment, physical, mental, sexual or verbal, must be prohibited and not tolerated.

Health and safety

We expect our suppliers to strive to implement the standards of occupational health and safety at a high level. The supplier complies with applicable occupational health and safety regulations and provides a work environment that is safe, hygienic and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work-related illnesses.

Freedom of Association and Collective Bargaining

The supplier shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

Improper payments/bribery

The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010.

Whistleblowing

The supplier shall maintain a program that ensures the confidentiality, anonymity, and protection of supplier and employee whistleblowers, unless prohibited by law. The supplier shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

CONFIDENTIALITY, PRIVACY AND DATA PROTECTION

The supplier shall comply with all agreed confidentiality and Privacy requirements in accordance with any contractual obligations, and national laws and regulations. Any communications regarding requests for service engagements must come from and be directed only to MTI's Project Management Office or wider delivery team.

INFORMATION SECURITY

The supplier shall comply with all agreed Information Security requirements in accordance with any contractual obligations, and national laws and regulations, such as GDPR, CCPA, PCI DSS, HIPAA. Any data should only be accessed or stored on MTI systems, unless written authorisation is given by MTI's Group Director of Operations.

The supplier shall adhere to and maintain security standards commensurate with industry recognised security frameworks, such as ISO/IEC 27001, Cyber Essentials Plus, SOC 2 Type 2, NCSC CAF, NIST CSF, or equivalent measures.

The supplier shall adhere to the requirements of the NHS Data Protection Toolkit (DSPT), and the CAF aligned DSPT, where appropriate.

The supplier shall notify MTI of all potential and actual security incidents that impacts MTI or its customers.

The supplier must adhere to any specific security requirements detailed within the Partner/Supplier Agreement Contracts or mutually agreed addendum to such contract.

ENVIRONMENTAL LAWS, REGULATIONS AND STANDARDS

The supplier shall comply with all applicable environmental laws, regulations and standards relating to the environmental impacts of their business.

Across all business functions, the supplier shall recognise that environmental responsibility is integral to producing world-class products. The supplier shall identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources, while safeguarding the health and safety of the public.

Resource Conservation

The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

Pollution Prevention and Waste Management

Emissions and discharges of air, water and land pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented. Participants shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

Materials Restrictions

Participants shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

Energy Consumption and Greenhouse Gas Emissions

The supplier shall support the United Nations Paris Agreement to achieve Net Zero emissions by 2050 and shall implement carbon reduction targets where appropriate.

Participants shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Participants shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions to minimise contribution to global warming.

The supplier shall publish Carbon Reduction Plans in accordance with PPN 06/21 and associated guidance and reporting standards for Carbon Reduction Plans, where appropriate.

BUSINESS CONTINUITY PLANNING

The supplier shall comply with all Business Continuity and Disaster Recovery requirements in accordance with any contractual obligations.

The supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases). This preparedness especially includes disaster plans to protect both employees and the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

MANAGEMENT SYSTEMS

MTI encourages its suppliers to implement their own binding guidelines for ethical behaviour. The supplier shall implement appropriate management controls to ensure compliance with applicable laws, regulations and customer requirements related to the participant's operations and products, conformance with the supplier code of conduct, and identification and mitigation of operational risks related to this code. The management system shall meet appropriate requirements for company commitment, management accountability and responsibility, legal and customer requirements, risk assessment and risk management, continual improvement objectives, training, communication, stakeholder engagement, audits and assessment, corrective action, documentation and record retention.

BUSINESS PARTNER DIALOGUE

The supplier shall communicate the principles stated in the supplier code of conduct and detailed above to its subcontractors and other business partners who are involved in supplying the products and services described in any main contract. The supplier shall motivate such parties to adhere to the same standards.

COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

MTI reserves the right, upon reasonable notice, to check compliance with the requirements of the supplier code of conduct. The supplier shall agree to provide access to all relevant documentation and cooperate fully with such audits. The supplier encourages its suppliers to adhere to the ethical standards, human rights, health and safety standards and environmental standards upon which this code of conduct is based, as part of fulfilling their contractual obligations.

The supplier must inform MTI immediately upon becoming aware of any actual or potential breach of the supplier code of conduct within their own business and their direct supply chain. The supplier shall take appropriate remedial action to prevent, end, or minimise any breach.

By signing below, you are accepting and agreeing to comply with the obligations set out in this code of conduct. Any breach of the obligations stipulated in this supplier code of conduct is considered a material breach of contract by the supplier.

SIGNED _____ DATE _____

PRINTED _____ POSITION _____