



Code of Ethics for McKinley Suppliers

Policy

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2. **General statements of the Code**

- McKinley is an ethical company with values and an excellent reputation for conducting business with integrity and fairness. As an organization, we expect our customers to share the same standards described in this document with its suppliers when carrying out their operations; as well as ensuring that their employees, subcontractors and suppliers have implemented these same ethical practices in the delivery of goods or the provision of services for the company.
- In compliance with free market regulations, we select our suppliers based on the suitability of their products, services, prices, delivery abilities and quality conditions.
- We only seek and select suppliers whose business practices reflect our values.
- We have a commitment to developing business relationships in an ethical, lawful, honest, fair, and long-lasting way with our suppliers, without discrimination or impositions.

3. **Suppliers' declaration**

- We expect that our suppliers provide relevant information and documentation when required, safeguarding the integrity and a mutual trust relationship documented with a confidentiality agreement.

4. **Working conditions**

- Suppliers must guarantee that all the activities are carried out in safe working conditions, the people involved are treated with respect and dignity with strict adherence to safety, health, and environmental regulations, as well as social responsibility principles as follows:
 - ✓ Respect for human rights.
 - ✓ Prohibition against hiring people under the local minimum working age.
 - ✓ Do not discriminate on the grounds of gender, religion, sexual orientation or nationality
 - ✓ Regulate the employees' working hours and rest periods.
 - ✓ Do not tolerate abusive behaviors whether physical, verbal, psychological, sexual or of any kind.
 - ✓ Remunerate fairly and competitively their employees.
 - ✓ Comply with safety, health, and environmental regulations when carrying out their activities.
 - ✓ Prohibition against carrying out activities under the influence of illegal drugs or alcohol, and possession of the aforementioned substances in McKinley facilities.

5. Correct use of assets and information

- Suppliers must protect and conserve the resources that McKinley makes available to them and use them only for the authorized purpose, including equipment, facilities, supplies, financial and operational information, intellectual property, brands, among others, and all provided to them for the fulfillment of the contracted services.
- Suppliers must protect confidential information; and they must not disclose it, improperly dispose of, copy McKinley information designated as confidential or proprietary, regardless of whether it was provided or accessed in verbally, in writing, electronically or visually.
- Suppliers must not advertise or disclose information on behalf of McKinley to the public, the press, official bodies, commercial entities, or others, or state or imply endorsement by McKinley or its employees.

6. Gifts

- McKinley suppliers must not offer any gift, or service to a McKinley employee which might or would appear to influence the employee's decision concerning the supplier. Commercial decisions must be based on fair and objective criteria, consistent with the customary commercial practice and in compliance with the laws.

6.1 Gifts that we CAN accept:

- ✓ Promotional items such as pens, books, notebooks, cups and magnets.
- ✓ Gifts baskets or similar items.
- ✓ Congratulation cards or thank-you notes for provided service.
- ✓ Moderate value dinners or entertainment activities that are infrequent as long as they will not bring negative consequences to the company's reputation.

6.2 Including but not limited, the gifts that CANNOT be accepted are:

- ✓ Cash or equivalents, such as pay checks, cards or gift certificates, or gift cards.
- ✓ Luxury items, including fine wine, watches, pens, or high-cost electronics, etc.
- ✓ Free services

7. Anti-money laundering law

- McKinley personnel and suppliers must comply with all applicable laws and regulations that prohibit money laundering. McKinley Personnel and suppliers must ensure that they do not facilitate or support the process of concealing the origin of illicit resources from terrorist or criminal activities through legitimate businesses.

8. Bribes and corruption

- The supplier must comply with the applicable anti-corruption laws and regulations and must have a zero-tolerance policy against any form of bribery, corruption, extortion, money laundering or embezzlement. This prohibition implies promising, offering, authorizing, giving or accepting either monetary or non-monetary (directly or indirectly through a third party) as a

way to obtain, retain or assure an improper business advantage, as these may lead to the termination of agreements entered into with McKinley and the initiation of legal action.

9. Governance

- Suppliers must make appropriate use of confidential information and ensure that all intellectual property rights are respected. McKinley can request suppliers' compliance verification with the aforementioned standards by any of the following methods and request corrective action if there is a reason for concern.
 - ✓ **Third-party assessments:** We may request essential information from a third party. For example, a data supplier can assist McKinley to assess a supplier's compliance and performance against the aforementioned standards.
 - ✓ **On-site audits:** We, or an authorized third party acting on behalf of McKinley, can contact suppliers and request authorization to verify on-site the compliance against the aforementioned standards.
 - ✓ **Continuous improvement:** It is expected that suppliers adopt continuous improvement of their sustainability performance.
- Sustainability can only be guaranteed through the commitment of all stakeholders, which is why McKinley will maintain good communication with its suppliers, and we look forward to our suppliers complying with applicable laws and respecting environmental, social and corporate governance internationally recognized standards.

10. Sanctions for non-compliance

- ✓ McKinley reserves the right to terminate the commercial relationship with suppliers for a breach of this Code.
- ✓ McKinley reserves the right to terminate the commercial relationship with suppliers who fail to provide written confirmation to McKinley, upon request, that they have implemented a program of control and that their suppliers and subcontractors comply with this Code.
- ✓ McKinley reserves the right to request that the suppliers certify, acknowledge receipt of, and understanding of this Code, with a frequency to be defined at its sole discretion.
- This Code does not confer rights to third parties, including rights of third-party beneficiaries.
- Suppliers' employees will not have rights against McKinley under this Code, nor will they have rights to enforce provisions of this Code, since the decision regarding such actions is reserved to McKinley's sole discretion.
- We appreciate compliance with this important Code and look forward to building a beneficial and reciprocal relationship with all of our suppliers based on the highest standards of ethical conduct.



11. Report of rights and responsibilities

- If you perceive a circumstance or action which is a breach or potential breach to this Code of Ethics for McKinley suppliers, contact us:
 - ✓ **United States: + 1855 245 1355**
 - ✓ **Email: ethics@biopappel.com**

Commitment Letter to the McKinley Code of Ethics for Suppliers

Including its partners, owners, management, directors, executives, employees, subsidiaries and affiliates of the "Company", provide this Commitment Letter to certify their commitment to comply with the Code of Ethics for McKinley suppliers.

The company certifies that the representation indicated in this Commitment Letter to the McKinley Code of Ethics for Suppliers is true and complete, therefore McKinley can trust it.

Likewise, the company certifies that, in the future there is a breach of any McKinley policy, or any change in the company's representation, the company is responsible for informing McKinley promptly, and providing details of the motive and extent of the changes.

Issued date

Full name of the company

Address for tax purposes

Full name of the legal representative

Signature of the legal representative