



Code of Ethics for McKinley Customers

Policy

1. Content

- ✓ Working conditions
- ✓ Correct use of assets and information
- ✓ Gifts
- ✓ Anti-money laundering law
- ✓ Bribes and corruption
- ✓ Governance
- ✓ Sanctions for non-compliance
- ✓ Report of rights and responsibilities

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 when carrying out their operations; as well as ensuring that their employees and customers have implemented these same ethical practices in the delivery of goods or the provision of services with McKinley.
- We have a solid commitment to maintaining the highest quality standards in the production and distribution of our products. We offer our customers a just, equal, and honest experience in each transaction, in strict accordance with the company's internal processes and controls.
- McKinley guarantees its products and services, promptly addressing customer complaints and looking for satisfaction beyond mere compliance.
- McKinley commits to maintaining our customer's preferences and loyalty and keeping a long-lasting and ethical customer-company relationship. We build long-term alliances with our customers as we consider them our strategic partners; moreover, we contribute to their growth and development; in part because of our Values and Code of Ethics.

3. Customers' declaration

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

4. Working conditions

- Customers must guarantee that all their 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

- Customers 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.
- McKinley protects confidential information and will not disclose, improperly dispose of, or copy customer information that is designated as confidential or proprietary, regardless of whether it was provided or accessed verbally, in writing, electronically, or visually.

6. Gifts

- McKinley customers must not offer any gift, or service to a McKinley employee which might or would appear to influence the employee's decision concerning the customer. 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 paychecks, 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 customers must comply with all applicable laws and regulations that prohibit money laundering. McKinley Personnel and customers 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 customer must comply with 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

- Customers must make appropriate use of confidential information and ensure that all intellectual property rights are respected. McKinley can request customer 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 customer's compliance and performance against the aforementioned standards.
 - ✓ **On-site audits:** We, or an authorized third party acting on behalf of McKinley, can contact customers and request authorization to verify on-site the compliance against the aforementioned standards.
 - ✓ **Continuous improvement:** It is expected that customers 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 customers, and we look forward to our customers 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 customers for a breach of this Code.
- McKinley reserves the right to terminate the commercial relationship with customers 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 customers 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.
- Customers' 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 customers 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 customers, contact us:
 - ✓ United States: + 1855 245 1355
 - ✓ Email: ethics@biopappel.com

Commitment Letter to the McKinley Code of Ethics for Customers

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

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

Likewise, the company certifies that, if 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