

Anti-Slavery/ Anti-Human Trafficking Policy

Effective Date: June 21, 2024

Authorized By: Neal Dongre, VP, Legal & Assistant Corporate Secretary

Purpose: This policy sets forth MSC's standards and requirements regarding the elimination of human trafficking and modern slavery from its primary supply chains.

Scope: Guidelines established in this Policy will govern all MSC lines of business throughout the world.

MSC is committed to responsible corporate citizenship and to eliminating all forms of human trafficking and modern slavery from our primary supply chain. This document sets forth MSC's policy regarding the elimination of human trafficking and modern slavery from its supply chain (the "Policy").

MSC strives to be in compliance with all applicable laws and regulations, including those addressing human trafficking and modern slavery such as section 54 of the UK Modern Slavery Act 2015 ([See MSC UK Policy here](#)) and the relevant sections of the U.S. Federal Acquisition Regulations (FAR) ("Applicable Laws"). We also expect our suppliers to operate their businesses with the utmost integrity and in compliance with Applicable Laws.

MSC requires its suppliers to agree to comply with this Policy and with Applicable Laws through either a Supplier Agreement, MSC's Supplier Terms and Conditions, and/or MSC's Annual Flowdown Letter ([See Annual Flowdown Letter here](#)). Each of these requires that suppliers: (1) if required, agree to the requirements of Federal Acquisition Regulations ("FARS") 52.222-50 and 52.222-56; and (2) warrant and represent that no products furnished to MSC will have been laundered or produced by sweatshop labor, forced labor, convict labor, indentured labor under penal sanction, abusive forms of child labor, exploitation of children, or any other form of human trafficking. When any supplier non-conformance with MSC's modern slavery and human trafficking policies is found, MSC requires each such supplier to perform corrective actions, and if the non-conformance persists, MSC will cease to do business with the supplier.

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, MSC provides training to relevant members of our staff. The training includes a detailed review of the MSC Supplier Agreement, Supplier Terms and Conditions, and Supplier Handbook.

MSC has established a targeted program for our exclusive brand suppliers located in the Asia-Pacific region to help ensure that their business practices and operations do not include or support human trafficking or modern slavery. This program includes:

- a comprehensive process for vetting potential suppliers, including thorough on-site factory visits to observe and assess working conditions;
- requiring certain suppliers that we engage with to:
 - certify that the products they provide to MSC comply with laws prohibiting slavery and human trafficking and that convict labor, forced labor, and human trafficking are not employed in the manufacture of their products;

and

agree to provide reasonable access to their records, employees and premises, if required by MSC or any of our customers, in order to verify compliance with MSC's agreements, policies and applicable laws and regulations, including laws prohibiting slavery and human trafficking;

- conducting formal audits, in addition to informal and/or unannounced visits to monitor and evaluate supplier compliance with our requirements.