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# MSI's Code of Conduct for Business Partners

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## 1. Introduction

The MSI Global Partnership, which includes UK-based MSI Reproductive Choices and local MSI organisations (collectively, "MSI"), helps women to have children by choice, not chance. MSI does this by providing contraception and safe abortion to women in urban and rural communities all over the world.

MSI expects its Business Partners to share its ethical business principles, as set out in this Code, and to promote these principles to their suppliers, sub-contractors and business partners. A Business Partner's approach to these principles is an important factor in MSI's selection and evaluation process, and acceptance of the Code is a pre-requisite in MSI's contracts with Business Partners.

MSI reserves the right to verify compliance with this Code by asking Business Partners to provide relevant information and by conducting audits and reviews.

Where breaches of the Code are identified and/or persist, MSI will consider termination of the business relationship with the partner concerned.

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## 2. Business integrity

### Compliance with laws and regulations

Business Partners will comply with all relevant laws, regulations, standards and any applicable international trade (including import and export/reexport controls) and economic laws and regulations, including tax, in the countries in which they operate and hold all licenses necessary to operate their business. Where the applicable laws and Code address the same subject and are not in conflict, the highest standard will apply. Should any Code requirement conflict with applicable laws, the highest standards consistent with applicable local laws will apply.

### Anti-corruption

Business Partners shall not take any action to violate, or cause their business partners to violate, applicable anti-bribery laws. They shall not engage in or tolerate any form of corruption, bribery, extortion or embezzlement. In particular, they must not promise, offer, authorise, give or accept anything of value, either directly or indirectly through intermediaries, in order to obtain or retain a business or other advantage from a third party, whether public or private.

### Conflict of interests

Business Partners must avoid conflicts of interest. They shall not enter into a relationship with an MSI trustee, director, employee or contractor which could lead such trustee, director, employee or contractor to make a decision that would not be in MSI's best interest. Business Partners are expected to disclose to MSI any situation that may appear as a conflict of interest, including any situation where a person working for MSI, or any close relation of such person, has an interest in the Business Partner's business or any kind of economic tie with the Business Partner.

### Political Contributions and Unauthorised Lobbying

Business Partners are not authorised to make any type of political contribution or charitable donations on behalf of MSI. Business Partners are not authorised to undertake any type of lobbying or other similar representative efforts on behalf of MSI before any kind of government entity, official, body or representative without the express consent of MSI.

## **Protection of Third Party Rights, Confidential Information and Privacy**

Business Partners must safeguard and make only appropriate use of confidential information of their business partners, and shall ensure that valid intellectual property rights are protected. Business Partners must ensure that they manage personal data in line with applicable laws relating to data privacy and data protection.

## **Anti-Money Laundering and Anti-Terrorism**

Business Partners must comply with the financial crime, anti-money laundering and anti-terrorism laws in all jurisdictions where they carry out their business activities. Business Partners shall not accept, facilitate or support money laundering. Business partners will conduct business only with reputable parties that are engaged in legitimate business activities, with funds derived from legitimate sources. Business partners must not accept funds known to be derived from illegal activities, or engage in any business or other arrangement with any party that is or may be involved with, or supports, terrorism. Business Partners shall not have dealings with any party that is on any US or UK government, or UN, terrorist list, or subject to international economic sanctions.

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## **3. Human rights and working conditions**

### **Forced Labour**

Business Partners shall prohibit any use of forced, bonded, indentured labour or involuntary prison labour. All work shall be voluntary, and workers shall be free to leave work or terminate their employment with reasonable notice. Business Partners shall not request that workers hand over government issued identification, passports or work permits as a condition of employment.

### **Child Labour**

Business Partners shall work against all forms of child labour. Business Partners must not employ children below the minimum age of employment or the age for completing compulsory education in the applicable country, whichever is the higher. Business Partners must not employ any young workers under the age of 18 to perform any work that is likely to be hazardous or harmful to their health and safety.

### **Non-discrimination**

Business Partners shall not practise any form of discrimination in hiring and employment practices including access to training, promotions and rewards on the grounds of race, colour, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

### **Fair Treatment**

Business Partners shall create and maintain an environment that treats all workers with dignity and respect and shall not use any physical abuse, verbal abuse, or sexual or other harassment, or the threat of any of the aforesaid. No harsh or inhumane treatment, coercion or corporal punishment of any kind, or the threat of any of the aforesaid, shall be tolerated.

### **Wages and Benefits**

Business Partners must pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits.

### **Working Hours**

Working hours, including overtime hours, shall comply with all applicable laws or recognised industry standards.

## Health and Safety

Business Partners shall provide a safe and hygienic working environment for workers. Adequate steps shall be taken to prevent accidents and injury to health arising out of workplace hazards. Where Business Partners provide housing to workers, it shall be clean and safe, and meet the living and safety conditions standard to the country and area.

## Safeguarding

MSI Business Partners will safeguard and protect the rights of children and vulnerable adults with whom they interact in the course of their operations. MSI's Business Partners will prevent any form of abuse, exploitation, neglect or violence within their operation. Business Partners will respond and take appropriate action if any form of abuse should occur, including: listening to and supporting survivors and/or whistleblowers by maintaining confidentiality and taking steps to protect them from further harm, investigating allegations and taking required disciplinary action where allegations are substantiated. Business Partners will identify potential risks, understand and mitigate those risks particularly in relation to protecting the rights of children and vulnerable adults with whom they interact in the course of their business.

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## 4. Environmental responsibility

Business Partners shall comply with applicable environmental legislation and international standards, including obtaining all required environmental permits and registrations that apply to their business activities. If environmental legislation is not evident or enforced, Business Partners shall adopt responsible practices for managing and, wherever possible, reducing their environmental impact, including optimising the consumption of natural resources and minimising the release of harmful discharges to the environment.

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## 5. Commitment

Business Partners are encouraged to fulfil the expectations set forth in this Code by allocating appropriate resources.

### Monitoring System

Business Partners shall have adequate systems and controls in place to ensure compliance with these standards or equivalent standards. Business Partners' systems and controls shall also apply to any sub-contractors, suppliers and business partners they work with, who are directly or indirectly connected with providing goods and services to MSI.

### Consequences in Case of Violations

Business Partners shall address any violations of these standards or equivalent standards that come to their knowledge and take appropriate action. Depending on the severity of the violation, appropriate action could be a request for corrective measures, disciplinary actions or termination of contract with the relevant party.

### Reporting

Business Partners are required to promptly report any suspected or known violations of this Code to MSI. Alternatively, the concerns can be directed in confidence via email to an independent whistle blowing hotline: [speakingup@safecall.co.uk](mailto:speakingup@safecall.co.uk). MSI will not tolerate retaliation against any person who is trying to do the right thing by raising a concern. A person who makes a good faith report about potential misconduct who experiences retaliation or other adverse action for raising a concern should report this immediately via the channels identified above.