



Supplier Code of Conduct

For an ethical working relationship

Supplier Code of Conduct

As a Certified B Corp®, we place ethics, corporate responsibility and sustainability at the heart of our operations. We want our business to be a force for good around the world. Helping people and the planet. Alongside 4,000+ companies in over 50 countries, we're part of a global movement of for-profit businesses building an inclusive and sustainable economy that works for everyone. As such, we require our suppliers to support our values as a B Corp and to uphold the principles set out in our Ethics Statement.

Our sustainable supply chain management process comprises appropriate supplier selection and supplier verification, together with monitoring of supplier compliance which is achieved through a two-stage process:

1. Our internal Purchasing Policy which sets out our process for supplier selection and verification; and
2. This Supplier Code of Conduct which augments the supplier verification process and governs supplier compliance and monitoring.

SUPPLIER CODE OF CONDUCT SCOPE AND APPLICATION

This Supplier Code of Conduct (Supplier Code) contains standards (Supplier Standards in Appendix 1) we require our Suppliers to comply with, to ensure ethical conduct in the workplace, safe working conditions, the protection of business and personal information, the treatment of workers with respect and dignity, sustainability and responsible supply chains. As used in this Supplier Code, "Supplier" refers to any entity providing products, people or services to The Myers-Briggs Company, including our subcontractors and agents. This Supplier Code supplements, but does not supersede, the contracts between The Myers-Briggs Company and the Supplier.

A. Supplier Standards

At a minimum, all Suppliers must operate in full compliance with the laws, rules and regulations of the jurisdictions (whether US, UK or otherwise) in which they operate and/or where they provide services to The Myers-Briggs Company. Additionally, we require suppliers to adhere to the Supplier Standards set out in Appendix 1. Where these set higher standards than the law provides, we expect Suppliers to adhere to such standards.

The Supplier Standards required of our Suppliers comprise:

- Human rights, labour conditions and anti-slavery
- Business Ethics and Anti-Corruption
- Business Security
- Health & Safety
- Environmental Protection

as set out in Appendix 1.

B. Supplier Compliance Management Process

Suppliers should commit to implementation of the principles of this Supplier Code with an compliance management process, appropriate to the size of their operation, to ensure ongoing compliance with applicable laws, regulations, and customer requirements, as well as conformance with this Supplier Code.

The management process should support the continual identification and mitigation of operational risks related to this Supplier Code, and must ensure prompt corrective action. Suppliers should create and maintain appropriate documentation and records to track and ensure compliance with this Supplier Code. As a key element of managing compliance, Suppliers must take steps ensure their sub-suppliers' own compliance.

C. Verification of Compliance - Monitoring and Inspection

In order to ensure and demonstrate compliance with this Supplier Code, suppliers should keep records of all relevant documentation and provide to us supporting documentation upon request at your own cost. We reserve the right to periodically verify your compliance, with surveys, questionnaires, requests for supporting documentation and other measures intended to increase visibility into our supply chain.

If the results of such an audit or inspection cause us to be of the opinion that you do not comply with this Supplier Code, we will ask you to take necessary corrective actions in a timely manner and as directed by us. If you fail to comply with this Supplier Code, then we may take action, including suspending or terminating your activities as one of our suppliers.

D. Consequence of failure to comply with the Supplier Code of Conduct

Failure to comply with this Supplier Code, and failure to remedy any breaches notified, will require the prompt establishment of corrective action plans or training, may affect Supplier's standing with The Myers-Briggs Company, may lead to disqualification from future opportunities with The Myers-Briggs Company, and may even result in the termination of the Supplier's business relationship with us.

E. Change Control

The Myers-Briggs Company reserves the right to update this Supplier Code of Conduct from time to time on an *ad hoc* basis as required following any change in law or substantial change to business. We will review the effectiveness of this policy to ensure it is achieving its stated objectives and is in compliance with the law. If this document you are reading is a printed copy or in electronic form accessed from a source other than directly from The Myers-Briggs Company website then you may not be using the most recent version. It is your responsibility to ensure you are using the latest version of this and other corporate documents at all times and where possible access documents directly from the above document repository.

The Myers-Briggs Company thanks you for being part of our commitment to more purposeful business.

Compliance Officer
March 2022

APPENDIX 1

SUPPLIER STANDARDS

We have drawn up these Supplier Standards to set out the working relationship we want to have with our Suppliers, and to ensure that Suppliers act responsibly and sustainably in relation to their own supply chain management. We therefore require Suppliers to comply with the following requirements:

1. Human Rights, Labour conditions & Anti-Slavery

We view it as a business imperative to uphold the human rights of workers by treating them with dignity and respect and we expect the same commitment from Suppliers. Accordingly, all participants should uphold the United Nations Declaration of Human Rights. As a minimum, this means we expect you to:

- respect the personal dignity, privacy and rights of each individual;
- refuse to make any person work against his or her will; and
- prohibit behaviour including gestures, language and physical contact that is sexual, coercive, threatening, abusive or exploitative.

We also expect you to provide fair labour conditions which means:

- No discrimination; focus on diversity, equity and inclusion
Suppliers must not engage in discrimination on any basis prohibited by applicable/local law, including, without limitation, race, colour, religion, age, gender, pregnancy, sexual orientation, gender identity and expression, national origin, disability, marital status, citizenship status, veteran status or military status.
The Myers-Briggs Company embraces diversity, inclusion and equal opportunity as fundamental principles and key components of our operations and strategy. We strongly encourage that all Suppliers do the same. Suppliers must also maintain a workplace culture based on respect where all forms of unlawful harassment and abuse, including sexual harassment, is forbidden. Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to employees and adequate training must be provided.
- No Child Labour
Not tolerate or use child labour in any stage of your activities. The term “child” refers to any person under the age of 15, or under the applicable minimum age for completion of compulsory education, or under the minimum age for employment in any particular country, whichever is the highest.
- Freedom of Association and Collective Bargaining
Respect the rights of employees to freely associate and bargain collectively (if appropriate). Suppliers must comply with applicable laws and regulations governing the legal rights of their employees to join or not to join worker organizations, including trade unions, and the right to collectively bargain, if they choose to be represented.
- Only Voluntary Labor
Not use any forced labour, including but not limited to involuntary prison labour, victims of slavery and human trafficking, bonded, or indentured labor, and to allow all employees the choice to leave their employment freely upon reasonable notice. Suppliers are prohibited from requiring workers to pay fees or lodge deposits for their employment, either directly or through third parties. Suppliers will not place any unreasonable restrictions on workers’ freedom of movement within, or in and out of, company provided facilities. Suppliers may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.
- Working Hours and Wages
Compensate employees fairly and follow local wage regulations and/or collective agreements, and where these do not exist, compensate employees so that, as the minimum, they can meet their basic needs. Employees and other workers should have the ability to earn fair and equal wages, as determined by applicable local law. Suppliers are fully responsible for the quality, performance, behavior, supervision and protection of their personnel. Ensure that employees are allowed appropriate time off and holiday, in accordance with applicable laws and regulations.

2. Business Ethics and Anti-Corruption

Suppliers are expected to conduct business with integrity and mutual respect and to uphold the highest standards of ethics and behaviour, including:

- **Business Integrity**
The Myers-Briggs Company is committed to its zero-tolerance approach to bribery and corruption in all forms and we also expect our suppliers to conduct their business in a similar way. All forms of illegal or inappropriate activity, including, but not limited to, corruption, misrepresentation, extortion, embezzlement or bribery, are strictly prohibited. You will not authorise, condone, encourage or promote, directly or indirectly through others, unlawful or unethical behaviour, such as bribery, kick-backs, pay-offs, promises to pay cash or things of value, or any other activities that may be construed as being corrupt, unlawful or unethical. Suppliers should have a formal “whistle-blowing” policy in place with measures to protect employees who raise concerns.
- **Competition, Advertising and Marketing**
The Myers-Briggs Company expects Suppliers to uphold fair business standards in advertising, sales and competition. If a Supplier, with The Myers-Briggs Company’s prior written approval, engages in any advertising, marketing or promotional activities that reference or implicate The Myers-Briggs Company, its name, logo or services in any manner, such materials must be truthful and accurate, with clear and conspicuous disclosure of material terms.
- **Alcohol and Drugs**
Suppliers must not engage in any work for or on behalf of The Myers-Briggs Company, or in any fashion represent us, while under the influence of alcohol or other substances that may impair the ability to work safely. In addition, Suppliers may not possess illegal drugs or controlled substances while on our premises or while conducting business with or for The Myers-Briggs Company.
- **Gambling**
Supplier must not engage in gambling, including games of chance, on our premises or while conducting business with or for The Myers-Briggs Company.
- **Property of The Myers-Briggs Company, Funds and Information; Records**
Suppliers must use all property of The Myers-Briggs Company, including, but not limited to, equipment, funds, documents, electronic and written information and communications systems, with care and adherence to acceptable standards and our rules and procedures. Suppliers are required to report any suspected or actual misuse, theft, vulnerability, improper exploitation, or sabotage of The Myers-Briggs Company property. Records prepared for us, including records of work time and expenses, must be accurate and complete.
- **International Business**
In conducting international business, Suppliers are expected to comply with all local standards and customs and related international laws relevant to where the Supplier operates and where the Services are provided, including without limitation, the US Export Administration Act, the Export Administration Regulations, the Foreign Corrupt Practices Act and UK Bribery Act.
- **Business Courtesies**
Suppliers must not provide entertainment that could embarrass or harm our reputation. Suppliers must never provide gifts or entertainment intended to improperly influence any person’s business judgment or that might create the appearance of undue influence. It is never permissible to give currency as a gift. When Suppliers collaborate with us in providing goods and services to government entities, or otherwise deal with governmental, gifts or entertainment of any value are not permitted.
- **Conflicts of Interest**
Suppliers must avoid engaging in any activity that would create an actual or apparent conflict of interest regarding their provision of products or services to The Myers-Briggs Company. A conflict of interest exists where The Myers-Briggs Company personnel have a financial or close personal interest relating to the Supplier or its personnel, and such relationship could interfere with or influence the award, conduct or oversight of work for us. In the event an actual or potential conflict of interest does arise, Supplier must immediately report it to The Myers-Briggs Company.

3. Business Security

The Myers-Briggs Company expects Supplier to conduct business in a secure manner meaning:

- **Security of Information**
The Myers-Briggs Company's confidential and proprietary information, including relating to our business activities, strategies, plans, structure, technology, customers, financial situation and performance, is critical to our success, and must be protected from disclosure and must not be used except in accordance with applicable regulations/ contractual requirements.
- **Data Protection and Privacy**
Suppliers must comply with all applicable privacy, data protection, and information security laws and associated regulatory requirements as well as with The Myers-Briggs Company's privacy, data protection, and information security policies agreed with The Myers-Briggs Company, whenever The Myers-Briggs Company's confidential and proprietary information is collected, stored, processed, disclosed, transferred and/or shared.
Suppliers must return or destroy The Myers-Briggs Company's information when the information is no longer necessary for the performance of Supplier's obligations or at the conclusion of its relationship with The Myers-Briggs Company.
If The Myers-Briggs Company provides a Supplier access to personal data/ personally identifiable information pertaining to The Myers-Briggs Company customers and/or employees, Supplier may only disclose such information to its personnel with a need to know such information in the performance of their work for The Myers-Briggs Company, and only if permitted to do so by its contract with The Myers-Briggs Company.
Supplier must adopt effective technical, physical and organizational measures that achieve these results.
For this purpose: "personal data/ personally identifiable information" is information that, either alone or in combination with other data, identifies or uniquely relates to an individual, such as an individual's name, social security number, financial account numbers and account passwords and pass codes, driver's license and/or government-issued identification number, mother's maiden name, date of birth, healthcare records, ethnicity.
- **Information Systems Security**
Suppliers who access the information systems or applications of The Myers-Briggs Company, or any The Myers-Briggs Company customer, may do so only as expressly authorized in writing by The Myers-Briggs Company and in accordance with contractual or other then-current requirements of The Myers-Briggs Company. The Myers-Briggs Company-issued access credentials such as passwords, user IDs or PINs must be protected at all times, and access to The Myers-Briggs Company systems and information must be immediately removed for any Supplier personnel who have been terminated or reassigned.
- **Physical Security - Building Keys, Access Devices and Non-Employee Identification**
Building keys, access devices, and non-employee identification cards may be issued to Supplier personnel who have a recurring business need to gain entry to The Myers-Briggs Company premises with or without escort. If The Myers-Briggs Company issues a building key or access device, the key or access device must: (i) be safeguarded; (ii) be used only by the authorized recipient; (iii) not be transferred without the consent of The Myers-Briggs Company; (iv) not be duplicated; and (v) be returned to The Myers-Briggs Company immediately when the employment of its holder is terminated, when its holder no longer requires such building key or access device, or at the request of The Myers-Briggs Company.
If The Myers-Briggs Company issues non-employee identification cards or access tags, Supplier personnel must wear such whenever they are at a The Myers-Briggs Company or The Myers-Briggs Company customer premises, and that identification must be returned to The Myers-Briggs Company immediately: (i) when the employment of its holder is terminated; (ii) when its holder no longer requires such identification; or (iii) at the request of The Myers-Briggs Company.
- **Security Risks/ Threats**
Implement reasonable measures for minimizing exposure of us to security threats such as terrorism, crime, pandemics and natural disasters.
- **Security Procedures**
Follow our security procedures when visiting or working at any of our locations and report any security concerns to the appropriate channels.

4. Health and Safety

Suppliers shall conform to all applicable health and safety laws and regulations, and to applicable industry codes and will provide a safe and healthy workplace for all employees and formally appoint a competent person to manage health and safety. Suppliers must have a program or mechanism(s) to enforce and monitor compliance with health and safety requirements. These programs or mechanisms should include at least the following elements:

- Occupational Safety
Suppliers must be committed to providing personnel with a safe place to work and making appropriate safety equipment available. You must ensure that personnel are trained and qualified to perform their work functions safely prior to initiating any work for The Myers-Briggs Company. Suppliers must have or subscribe to a written safety and health program.
- Emergency Preparedness
Suppliers must have emergency plans and response procedures that include: (i) emergency preparedness, reporting and notification; (ii) evacuation procedures, training and drills; (iii) appropriate hazard detection and suppression equipment; and (iv) adequate exit facilities from job sites. Suppliers must ensure that their personnel performing services in The Myers-Briggs Company facilities are aware of and comply with The Myers-Briggs Company emergency plans and response procedures for those facilities.
- Occupational Injury and Illness
Suppliers must have procedures and systems to manage, track and report: (i) occupational injuries and illnesses; (ii) exposure of workers to chemical, biological and physical agents; and (iii) violations and fines from the Occupational Safety and Health Administration or corresponding local regulatory agencies. Such procedures and systems must include provisions to: (a) encourage worker reporting; (b) classify and record injury and illness cases; and (c) investigate cases and implement corrective actions. Fatalities, injuries, illnesses, property damage, vehicle incidents and near-misses occurring on The Myers-Briggs Company controlled premises while delivering services must be reported as directed by The Myers-Briggs Company.

5. Environmental Protection

The Myers-Briggs Company is committed to environmental protection and climate justice and is working towards NetZero by 2030. We are committed to limiting the environmental impact of our operations by reducing waste and managing emissions and pollution with scientific based targets where possible. We expect our Suppliers to comply with all applicable environmental legislation and, to the best of their ability, to prevent and mitigate environmental and health risks and to reduce and limit emissions and pollution. We encourage Suppliers to commit to environmentally sound practices and, appropriate in view of the size and scope of their operations, demonstrate commitment to responsible environmental stewardship, including:

- Compliance with Environmental Laws
Suppliers must comply with all environmental laws and requirements, including those relating to: (i) the management and disposal of hazardous materials; (ii) contaminants in air, soil or water; (iii) the protection of natural resources, wildlife and wetlands; and (iv) recycling.
- Pollution Prevention and Resource Reduction
Suppliers must strive to reduce eliminate or prevent waste of all types, by conserving materials and modifying their production or maintenance or facility processes. Suppliers must also work to reduce the volume and toxicity of products throughout the life cycle.
- Environmental Consideration in Business Decision-making
Suppliers are to work with their own sub-suppliers to assess and address environmental and sustainability issues within their supply chains.
- Assessment and Improvement of Environmental Practices
Suppliers are to implement environmental management systems and focus on continuously monitoring and improving their performance. Well-designed “key performance indicators” and meaningful short- and long-term improvement targets are essential.

Compliance Officer
March 2022