



**MAC Thin Films Policy on Human Trafficking,
Modern Slavery and Human Rights**

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Page 1 of 2



MAC Thin Films Policy on Human Trafficking, Modern Slavery and Human Rights

The Company is strongly committed to supporting and maintaining the highest standards of ethical conduct and respect for human rights. This respect is embedded in the Company's culture. As a responsible corporate citizen, MAC Thin Films fully supports the elimination of human trafficking and slavery, including from the entire supply chain. Our policies, practices and procedures reflect our commitment to human rights as set forth in the Universal Declaration of Human Rights and sound employment practices.

MAC Thin Films does not tolerate trafficking in persons, including the procurement of commercial sex acts and the use of forced or child labor. We believe the transparent disclosure of our anti-human trafficking efforts is critical. We have comprehensive policies and procedures, which require our employees and suppliers to comply with applicable law, behave in an ethical manner and ensure the integrity of their operations in support of our programs. Acting with integrity includes being accountable for the highest standards of behavior. We expect our suppliers to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity, and foster an inclusive and ethical culture. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations. Suppliers are required to ensure that child labor is not used in the performance of our work.

In addition, our standard procurement terms and conditions contain provisions requiring our suppliers to comply fully with all applicable laws and regulations, including explicit obligations regarding anti-human trafficking.

Due Diligence/Verification of Supply Chain, Evaluation of Risk and Compliance

We require prospective suppliers to complete a due diligence process during which we: (1) collect information from the supplier; (2) review the supplier's reputation and background; and (3) conduct a risk-based assessment of certain suppliers operating in international locations. We recognize that different territories and different activities give rise to different levels of potential risk from a modern slavery and human trafficking perspective. As such, the company's analysis of suppliers and transactions is assessed on a risk-adjusted basis. Suppliers and/or the territories in which they operate that pose potentially higher risks of human trafficking and/or slavery may be subject to more detailed risk assessments and additional oversight including physical inspections, if necessary, to help ensure compliance with our policies and procedures and applicable law.



Maintenance of Ethics and Compliance Program and Accountability

We maintain a broad-based corporate ethics and compliance program that addresses values, leadership, training, audits, certifications, and accountability and is intended to ensure compliance with applicable laws and a culture committed to ethics and integrity in all we do.

Our employees are responsible for complying with our Standards of Business Conduct and other policies and procedures, including those that seek to combat human trafficking and forced labor. MAC Thin Films employees found to be in violation of this procedure are subject to discipline, up to and including termination.

Training of Relevant Employees and Suppliers

We provide targeted training and awareness on human trafficking and forced labor through various methods. Employees who have direct contact with our suppliers are required to complete additional awareness training.

Reporting Violations and/or Concerns

We expect and ask our employees to raise any concerns regarding violations of law, regulations to our Executive management Team.

Review of Anti-Human Trafficking Efforts

We periodically review our anti-human trafficking mitigation efforts considering our ongoing compliance obligations to monitor effectiveness and to ensure consistency with our Values

We will continue to review and enhance as appropriate our efforts to prevent human trafficking and other misconduct within our global supply chain.