



9.

Information security and intellectual property rights

Information security

All companies possess certain proprietary information that could harm their commercial or legal position if disclosed to or used by unauthorized third parties. Laws exist in many countries to protect this type of proprietary information, and MHI takes active steps to ensure the protection of its proprietary information.

MHI employees must commit to:

- take sufficient safety measures to maintain the confidentiality of all business and technical information as determined by MHI's policies, with such measures based on the importance of the information,
- take precautionary measures to prevent unauthorized access, loss, destruction, and leakage of proprietary information and take appropriate management measures to ensure business continuation (and recovery if possible) in the event of such a loss, and
- respect the intellectual property and proprietary information of others.



From time to time, MHI employees may need to share proprietary information with a third party not employed or contracted by MHI. Although there might be a valid requirement to disclose such information, the employee must never disclose any proprietary information to a third party without the prior approval of their manager, the Legal Department, or HR.

MHI employees should not use confidential information that belongs to other companies, unless it has been properly obtained. This typically requires explicit permission from the owner, and then the use is restricted by any use restrictions accompanying the permission. When proprietary information of a third party is offered to an employee through a manner that is not authorized, the employee is expected, in all instances, to refuse the offer.

At times, newly hired employees may possess proprietary information about their former employers. MHI does not wish to receive or have access to any such proprietary information and expects that all employees will respect the confidentiality of this information and never reveal or use (or ask a co-worker to reveal or use) such information in connection with the provision of services for MHI.

MHI goes to great lengths to prevent information security incidents (a misuse or unauthorized disclosure by MHI of either MHI's proprietary information or the proprietary information of a third party). When an information security incident occurs, the relevant MHI employees must work with MHI to minimize the damage as soon as possible and to take appropriate measures to prevent the reoccurrence of the incident in the future.



9.

Information security and intellectual property rights (cont'd)

Intellectual property rights

Intellectual property rights are one of MHI's greatest assets, and accordingly, MHI places great importance in the protection of our intellectual property rights. However, MHI also respects the intellectual property rights of third parties and seeks to avoid the unauthorized use of any third-party intellectual property in any MHI's products. Unauthorized use of third party intellectual property could significantly disrupt MHI's business activities and could also subject MHI or the individual to fines or criminal prosecution. Therefore, MHI employees must always contact the Legal Department if there is any uncertainty whether their use of third party intellectual property is permitted.

Information obtained from external sources like the Internet should be used with great caution. Just because it is found on the Internet does not mean that it is free to use for MHI's products. Information from external sources should be used for MHI's products only after consultation with the Legal Department.

Specifically, MHI employees should not:

- download any unlicensed software onto an MHI computer or copy for personal use any software owned by or licensed to MHI,
- distribute or publish information about any MHI products, technologies, or processes without obtaining prior authorization, or
- distribute or publish any data protected under data protection laws without prior authorization.

MHI employees are expected to abide by the obligation not to distribute, use or make public any MHI information about MHI products, technologies and processes even after the end of their employment.

10.

Privacy

Personal data protection

MHI respects the privacy of all individuals, including customers and employees, and takes very seriously its responsibilities for personal data protection, including the obligations to properly handle and maintain such data in compliance with applicable data protection laws and with any relevant contractual obligations.

No personal information or data owned by MHI will be used or disclosed for personal purposes and will not be sold, rented, loaned, leased or otherwise disclosed to any third parties outside of MHI, except when MHI has the individual's express permission or under special circumstances, such as when MHI believes in good faith that disclosure is necessary to comply with the laws or regulations of a governmental or regulatory body.

MHI will therefore:

- respect the applicable data protection laws of the countries within which it operates,
- acquire or retain an employee's personal data only to the extent that is necessary to the employee's work at MHI, or that it is required by law in the specific country in which the employee works, and
- make sure that access to personal data is limited to people who have appropriate authorization and a clear business need to access the data.

Use of company owned computer and e-mail

Employees should be aware that MHI owns all the data, not limited only to e-mail data, stored on computers. Under certain specific conditions and in accordance with applicable laws and regulations, MHI will be entitled to review an employee's use of the computer and e-mail in order to:

- ensure proper operation of its systems,
- check employees' compliance with MHI's IT security rules and other internal policies, and
- prevent or detect crime.





11.

Occupational environment and human rights

Working in a safe environment

MHI considers its employees to be its most important asset to achieve its goals and believes that all employees are entitled to a safe and secure workplace where no one is exposed to unnecessary risk.

MHI is committed to:

- continuously review and improve its occupational health and safety procedures and guidelines, and
- give employees the appropriate training and information they require to manage risks in their own work environment whether on MHI property or any other site.

In support of MHI's commitment every employee is obliged to:

- participate in all mandatory training,
- undertake only work for which they are trained, competent, and fit to perform,
- follow MHI's safety rules and procedures at their workplace, including the use of all relevant standards and instructions,
- demonstrate safe working practices and refrain from work that is potentially unsafe,
- help to ensure other people – employees, sub-contractors and other relevant parties – follow MHI's safety rules and procedures, and
- refrain from work when their performance is impaired by illness, injury, alcohol, or any other substance, prescribed or otherwise.



Respect and equality

MHI is strongly committed to human rights and employees' rights as expressed in the relevant international conventions.

With this Code of Conduct, the company seeks to support and develop a single common corporate culture. This culture is one of inclusion and mutual trust, in which everyone who works for MHI is treated equally with dignity and respect, regardless of race, color, religion, political conviction, gender, age, national origin, sexual orientation, marital status or disability or any other characteristic protected by national or local laws. MHI will not tolerate discriminatory treatment of any kind.

MHI will ensure that it:

- does not use compulsory or forced labor in any of its operations,
- does not use child labor in any of its operations,
- maintains a framework of fair and just remuneration, fair working hours and benefits, and
- maintains open communication with employees, according to the laws or practices of the countries in which it operates.

Work environment free of harassment

Every MHI operation should be characterized by mutual trust and respect for the individual.

Therefore MHI will not tolerate:

- sexual harassment,
- any other kind of harassment, whether direct or indirect, physical or psychological, verbal or non-verbal, and
- any other action or activity that creates a hostile working environment for its employees.