

# Integrity |

Our Basis for Success



Global Code of Business Conduct

# Table of Contents

## Introduction

From the Office of the CEO .....	1
Our Mission and Values .....	2
Introduction and How to Use the Code .....	4

## Section 1: Reporting Obligations and Resources

Tools and Resources .....	6
MSA Ethics Guideline .....	7
How Ethics Guideline Reports are Routed and Reviewed .....	7
OUR POLICY: No Retaliation .....	7

## Section 2: Our Fundamental Obligations

Honest and Fair Dealings .....	8
Compliance with the Law .....	8
Additional Obligations for Managers .....	9
Consequences of Violating the Code or the Law .....	9
Compliance Training .....	9

## Section 3: Our Workplace

An Environment of Mutual Respect .....	10
Workplace Harassment and Bullying .....	11
Fair Treatment and Diversity .....	11
A Safe Workplace .....	12
Substance Abuse .....	13
Confidential Information .....	14
Intellectual Property .....	15
Use of Information Technology .....	15

## Section 4: Our Business Partners

Conflicts of Interest .....	16
Concurrent Employment .....	17
Bribery and Corruption .....	18
Gifts and Entertainment .....	20
Loans .....	20

## Section 5: Our Shareholders

Accuracy of Books and Records .....	22
Fair Disclosure and Fraud .....	22
Insider Trading .....	23
Use and Protection of Company Assets .....	24
Audits .....	24
Corporate Opportunities .....	24

## Section 6: Our Marketplaces & Communities

Exporting Our Products and Technologies .....	25
Advertising and Promotion .....	26
Antitrust and Fair Competition .....	26
Environmental Compliance and Sustainability .....	27
Social Responsibility and Citizenship .....	28
Telling Our Story .....	29
Social Media .....	29
Waivers of the Code .....	29
MSA Ethics Guideline Telephone Numbers .....	30



Dear associate:

Every day, MSA associates work hard to help protect people and make our world a safer place to live and work. In fact, for more than a century, generations of MSA associates have dedicated their careers working to ensure that MSA's reputation as the world's leading developer and manufacturer of safety equipment and systems is never diminished or tarnished. Today, I believe that kind of commitment is more important than ever.

To sustain our long-term success, we must always stay focused on operating our business with uncompromised integrity - the foundation of our values system. Integrity, simply put, means doing the right thing. It means making sure that our commitment to our customers, our business partners, our shareholders, our communities and to each other is never compromised. To me, integrity is "Our Basis for Success."

Accordingly, we maintain a longstanding Global Code of Business Conduct, or the "Code." The Board of Directors, our Executive Leadership Team and I expect all associates throughout the world to read, understand and follow the Code in all business dealings, without exception. When unsure how to proceed in a particular situation, the Code will guide you to additional resources, such as our Chief Compliance Officer, our Law Department, and our Human Resources Business Partners, so that you always have someone to turn to BEFORE acting. While you are reading or referencing the Code, I also ask that you keep in mind the mission of MSA - which has never changed - that men and women may work in safety, and that they, their families and their communities may live in health throughout the world.

That mission is why we come to work every day, and the Code serves as the foundation of that mission. It clearly explains our expectations for business conduct, and by taking the time to read, understand, and follow it - you demonstrate the same level of commitment that has been a staple of our culture since our founding.

Thank you for being a part of our mission and your commitment to Integrity!

Sincerely,

A handwritten signature in black ink that reads "Nish Vartanian".

**Nish Vartanian**

*Chairman, President, and CEO*

# Our Mission and Values



MSA's mission is to see to it that men and women may **work in safety** and that they, their families and their communities may **live in health** throughout the world.

### Our Mission and Values

MSA's mission, which has gone unchanged for more than a century, is to see to it that men and women may work in safety and that they, their families and their communities may live in health

throughout the world. Very simply, doing all that we can to keep people safe at work is at the center of everything we do. Accordingly, and as the Safety Company, this "mission of safety" begins at home and is deeply rooted into our own culture

and values. In short, our core values – anchored by Integrity – are encompassed by a Culture of Safety. We strive to practice what we preach. And together, this culture and our values establish the roadmap for achieving our mission.

**INTEGRITY:**

We conduct ourselves with unwavering high standards of honesty, trust, professionalism, and the highest levels of ethical behavior wherever we operate.

**CUSTOMER FOCUS:**

We provide our customers with a superior customer experience by delivering high-quality products and support services in order to exceed their expectations and gain their trust and loyalty.

**SPEED & AGILITY:**

We anticipate and respond quickly to business issues and opportunities and the needs of our customers. We are accountable for making decisions using

processes that achieve quality results and communicate an appropriate sense of urgency to those who are impacted by our actions.

**INNOVATION & CHANGE:**

We embrace change and encourage innovation throughout the organization. Innovation is the process of developing and applying new ways of addressing opportunities for improvement, and creating solutions that add value.

**DIVERSITY & INCLUSION:**

We welcome a wide variety of people, thoughts, perspectives, and ideas that enable us to embrace and utilize the rich dimensions of each individual. We believe

that openness to people and ideas creates a global competitive advantage for MSA that brings a measurable performance gain to all facets of our business.

**TEAMWORK:**

We work in a coordinated and cooperative manner at all levels to accomplish our organizational objectives.

**ENGAGEMENT:**

We value highly motivated employees committed to achieving excellence. We drive this mindset by setting clear expectations and empowering associates to achieve results. We fuel this level of engagement by providing timely feedback, project ownership, and opportunities to grow.



# Introduction and How to Use the Code

All associates and business partners are expected to conduct themselves in a manner that **reflects well upon themselves** and the Company, consistent with the Company's values and **longstanding commitment to integrity.**



Integrity has been at the foundation of MSA since 1914, when John T. Ryan and George Deike insisted there was a better way to protect workers. While the Company has evolved and grown over the years, our commitment to integrity has only gotten stronger. In fact, this commitment is one of the fundamental reasons for our continued prosperity and, importantly, is formally represented as the Company's foundational value. Few companies have a longer, more successful history than MSA, and we owe much of that success to our commitment to always conduct business with integrity, or "the MSA way."

## **Why does MSA have a Code?**

All associates and business partners are expected to conduct themselves in a manner that reflects well upon themselves and the Company, consistent with the Company's values and longstanding commitment to integrity. To help ensure that we live out that commitment, MSA has published this Global Code of Business Conduct, or the "Code."

## **What does the Code do?**

The Code sets forth our core obligations and requirements for ethics and compliance with the law, along with examples, guidance, and resources to assist us

All MSA associates throughout the world are **required to follow the Code** in all MSA business dealings, without exception.

in understanding our obligations and to guide us in making decisions each day. We are all held accountable for our actions under the Code, so it is crucial that associates read, understand, and follow it.

#### **Why does the Code reference other documents?**

In certain instances, the Code is supplemented by more detailed Company policies that further define rules and responsibilities for particular topics. When other policies apply, the Code will make specific reference to them. Similarly, not every policy is detailed in the Code, so associates must be sure to regularly review all policies and procedures that apply to them. This Code and other policies will be updated from time to time, so associates must be sure they are aware of the most current obligations that apply to their business activities. It is the obligation of each associate to obtain and review the most current versions of the Code and other Company policies, and each of us will be held accountable for following them.

#### **Who does the Code apply to?**

All MSA associates throughout the world are required to follow the Code in all MSA business dealings, without exception. Furthermore, our vendors, channel partners, third-party sales representatives, and other third parties acting for MSA must act with integrity at all times and adhere to the policies and procedures that the Company extends to them. Finally, the Code applies globally, so references throughout the Code to “MSA” and the “Company” mean MSA Safety Incorporated and all of its affiliate companies throughout the world.

#### **What should I do if I suspect that the Code is not being followed?**

You are obligated to promptly speak up if you believe that any aspect of this Code is not being followed. Section 1 contains a variety of resources to support you in reporting your concerns, including anonymous reporting. MSA treats all reports with the utmost seriousness and sensitivity and prohibits retaliation against associates who raise their good faith concerns.

#### **What are the consequences for violating the Code?**

Failure to follow the Code will result in disciplinary action, which depending upon the seriousness of the matter, may include termination of employment. Yes, we take our integrity that seriously!

#### **Are there any exceptions to the Code?**

The Code sets the minimum standards of required behavior. There may be circumstances where an applicable local law has more strict requirements; in those cases, the local law must be followed.

# Reporting Obligations and Resources



Simply put, **you must speak up** when something **does not seem right**.

We must always ask questions and raise concerns before acting, when confronted with a situation that might violate the Code, other Company policies, or the law. Simply put, you must speak up when something does not seem right. This means that if you are aware of or suspect any activity that might violate the Code, the law, or related Company policies, you must promptly report it. MSA has spent years establishing its role as a market leader and a company that does business with integrity. Informing the Company of your concerns as they arise will best position us to quickly address any issues while also preserving our good name.

## Tools and Resources

MSA offers a variety of resources to assist you in asking questions, voicing concerns, or reporting potentially unethical or unlawful conduct. First and foremost, the Company believes strongly in open lines of communication among our associates, supervisors, and managers. For that reason, associates are encouraged to first approach their supervisor or manager when confronted with questions or concerns. For situations where associates are unable or unwilling to approach their supervisor or manager, we offer several alternative paths for you to choose, as shown to the right.

Our reporting resources, including the Ethics Guideline, must not be used inappropriately, such as for intentionally filing false reports.

## THE MSA WAY

### **Report your concerns— It is your obligation!**

- When you are struggling with a question or concern about your obligations under the Code, other Company policies, or the law, you must err on the side of caution and seek guidance BEFORE acting.
- In the unlikely event that you observe or suspect a possible violation of the Code, other Company policies, or the law, you have an obligation to promptly report it.

### **Where to report your concerns:**

- Your supervisor or manager
- Your geographic or functional business leader
- Your local or regional Human Resources Business Partner
- The Internal Audit Department
- The Chief Compliance Officer
- The Law Department
- The MSA Ethics Guideline ([www.msasafety.com/ethicsguideline](http://www.msasafety.com/ethicsguideline))

### **You can also send written correspondence to:**

MSA  
1000 Cranberry Woods Drive, Cranberry Township, Pennsylvania 16066, U.S.A.  
Attention: Chief Compliance Officer



## The MSA Ethics Guideline is a telephone and internet resource available to associates **24 hours a day, seven days a week.**

### MSA Ethics Guideline

The MSA Ethics Guideline is a telephone and internet resource available for associates to ask questions or report concerns 24 hours a day, seven days a week. You can access the Ethics Guideline using a secure, third-party managed website or one of the toll-free telephone numbers listed at the end of the Code. The toll-free number is answered by trained specialists speaking your local language, and the internet tool is available in your local language.

When contacting the Ethics Guideline, you have the option to provide your name or remain anonymous. Further, should you wish to follow up on your report, the Ethics Guideline allows for anonymous written interaction between the Company and an anonymous reporter. Simply follow the instructions provided to you at the time of your initial report, to check on the status of your report.

### How Ethics Guideline Reports are Routed and Reviewed

All reports to the Ethics Guideline are forwarded directly to the Chief Compliance Officer, who works with members of the Executive Leadership Team to identify the appropriate review process for each matter. The Chief Compliance Officer ensures that all

matters are reviewed by appropriate personnel (such as Legal, Internal Audit, Human Resources, Information Technology, or other functional leaders), and that each matter is appropriately addressed.

Each matter is reviewed promptly, with sensitivity and discretion, and the Company maintains formal processes to provide for the confidentiality of each person who contacts the Ethics Guideline. If you choose to provide your name or contact information when contacting the Ethics Guideline, you will be contacted to discuss your concerns.

### OUR POLICY: No Retaliation

Regardless of how you choose to report, you have our full commitment that the Company will not, under any circumstances, allow retaliation against you for raising a concern in good faith. Retaliation can take many forms, including, but not limited to the following types of actions – altering job responsibilities and compensation/benefits, excluding an associate from workplace activities and meetings, and other types of behavior. Furthermore, any associate who attempts to retaliate against someone for raising concerns will face disciplinary action, up to and including termination of employment — our commitment is that important!

## THE MSA WAY

The Ethics Guideline is a reliable, trusted way to ask questions or voice concerns about conduct that might violate the Code. You can contact it two ways:

### By telephone:

Speak with a live, trained operator in your local language who will provide a written report of your concerns to MSA. Please see the end of the Code for the telephone number in your country.

### Online:

Provide your own written summary of concerns or questions at an online, secure website:  
[www.msasafety.com/ethicsguideline](http://www.msasafety.com/ethicsguideline)

### When should I speak up?

*You must speak up anytime you are confronted with a situation that may violate the Code, the law, or related Company policies. Some examples are:*

- Conflicts of interest • Improper or questionable gifts or gratuities • Improper or questionable accounting practices • Fraud or theft • Questionable workplace health and safety practices • Threats of violence • Workplace harassment • Discrimination • Suspected bribery or corrupt business practices • Export or trade sanctions compliance matters • Antitrust (competition law) compliance matters • Product quality or safety concerns • Environmental compliance matters • Retaliation • Insider trading matters • Legal or ethical concerns with third parties • Other potentially unlawful or unethical conduct.

Regardless of the business circumstances, associates must always act **ethically, fairly, and honestly.**



### **Honest and Fair Dealings**

The Code explains and describes integrity in great detail and various examples are provided throughout. But in the most basic way, acting with integrity means acting with honesty and fairness. Regardless of the business circumstances, associates must always act ethically, fairly, and honestly when dealing with business partners and other key stakeholders, such as customers, distributors and other representatives, shareholders, suppliers, competitors, coworkers and governmental authorities.

This obligation also extends to our interactions with the Company itself, such as when we submit expense reports or record our hours worked. Honesty and fairness are always required.

### **Compliance with the Law**

All associates must comply with the law in all circumstances, without exception. While MSA is a United States-based company, we maintain offices and operations across the world. This means that compliance with the law requires us to follow not just the laws that apply to us in the United States, but also the laws

that apply to us in all countries where we do business. We are a global company with global legal obligations.

The laws we are required to follow address various topics, such as financial reporting, bribery and corruption, insider trading, importing and exporting, competition (antitrust), workplace health and safety, environmental protection, and many more. MSA maintains specific policies for many of these laws, and the more commonly encountered laws are addressed in greater detail throughout the Code.

## Additional Obligations for Managers

Every manager is responsible for maintaining a work environment that encourages, reinforces, and supports ethical conduct and compliance with the Code, the law, and related Company policies. This means that managers must lead by example and demonstrate their commitment to the Code through their actions each day. Managers must also maintain an open-door policy so that associates under their supervision have the ability to raise questions or concerns. Managers are also responsible for monitoring compliance with the Code in areas under their responsibility. This means that managers must pay attention to their work environment and understand the decisions and conduct occurring around them. Finally, managers must ensure that ethics or compliance-related concerns brought to their attention are promptly forwarded to the Chief Compliance Officer. This means that when a manager receives a concern from an associate and believes the matter involves a possible violation of the Code, the law, or related Company policies, the manager must promptly forward it to the Chief Compliance Officer. It also means that a manager must never retaliate or permit retaliation against an associate who has raised a good faith concern.

## Consequences of Violating the Code or the Law

Violations of the Code, the law, or related Company policies may create substantial risk to MSA. Accordingly, such violations will result in appropriate disciplinary action, up to and possibly including termination of employment.

## THE MSA WAY

All managers are responsible for maintaining a work environment that encourages, reinforces, and supports ethical conduct and compliance with the Code and the law.

## Ethical Decision Making

The Code is designed to help you identify a wide range of topics that may impact ethics and compliance. It is not intended to cover every potential situation or scenario, but is one of a variety of tools that can be used to help you make the right ethical choice. If you ever face a situation where you are unsure of the right thing to do, consider the guidance below, and speak up if you're unsure of what to do.

- Identify the problem
- Consider the relevant facts and potential impact
- Review and apply the Code
- Review and apply other Company policies and procedures
- Evaluate options and ask how others might view the chosen action
- Seek out assistance from a manager or supervisor, the Law Department, the Chief Compliance Officer, the Ethics Guideline, or other available resource
- Implement the chosen course of action
- Check back to review the impact of the chosen course of action

## Compliance Training

MSA provides associates with a variety of ethics and compliance training on various topics related to the Code. For many associates, the training provides a general overview. For other associates, the training might be more detailed. The type of training we offer you depends on your job function at MSA. Regardless of your role, when we offer compliance training, you are required to complete it. This includes all forms of training, such as classroom instruction, self-paced internet training modules, written materials, and other forms.





...we are committed to ensuring **a workplace free from discrimination, harassment and bullying**, and each of us should expect a workplace that promotes dignity and respect.

#### **An Environment of Mutual Respect**

A key to the success of MSA is our people. With that recognition, we are committed to ensuring a workplace free from discrimination, harassment and bullying, and each of us should expect a workplace that promotes dignity and respect. MSA will not, under any circumstances, tolerate any form of discrimination or harassment in the workplace and will address any such action without exception.

**T H E M S A W A Y**

At an after-hours social event, an MSA colleague asked me to go out on a date and expressed romantic feelings for me. I said I was not interested in anything beyond our professional relationship. However, my colleague has continued to ask me out, to the point that it is making me very uncomfortable in the workplace.

**What should I do?**

You should immediately report this behavior to your supervisor or manager, Human Resources Business Partner, the Chief Compliance Officer or the MSA Ethics Guideline. Repeated, unwelcome advances are inappropriate and unacceptable in the workplace, and MSA will not tolerate them under any circumstances. Every associate is entitled to a workplace of mutual respect and without fear or intimidation.

**Workplace Harassment and Bullying**

MSA maintains a zero-tolerance policy on harassment and bullying.

Harassment is unwanted and offensive verbal, written, physical, or visual conduct which has the purpose or effect of interfering with work performance or creating an intimidating or hostile working environment for another person because of sex, sexual orientation, race, age, national origin, religion, or other status protected by law.

Some examples of harassment include:

- Epithets
- Slurs
- Threatening or intimidating actions
- Improper jokes
- Repeated and unwanted flirtations
- Discussions, references, or displaying content of a sexual nature
- And more.

Bullying is repeated unwelcome, unreasonable, or inappropriate behavior, whether verbal, physical, psychological, or otherwise, that undermines or interferes with another's work performance, which a reasonable person would find offensive, threatening, or humiliating. In instances where bullying does not constitute workplace harassment, such conduct will still be found to violate the Code and the Company's Harassment Free Environment and Anti-Bullying Policy.

*(See the Harassment Free Environment and Anti-Bullying Policy for more information)*

**Fair Treatment and Diversity**

MSA recognizes the critical importance of diversity in the workplace, and we celebrate the various cultures of the global business environment in which we operate. MSA promotes diversity of thought and fair treatment for all associates and applicants without regard to age, color, creed, disability, ethnicity, marital status, national origin, race, religion, gender and gender identity, Veteran's status, and any other classification afforded protection by applicable law.

**T H E M S A W A Y**

A colleague of mine often tells offensive and crude jokes at work. While they are not directed at me, I routinely overhear them. I have told the colleague that the jokes are offensive, but the jokes have not stopped.

**Is there anything I can do?**

You have the right to enjoy a workplace that promotes dignity and respect. The colleague's behavior is inappropriate and must never be tolerated. Associates should immediately report this behavior to their supervisor or manager, Human Resources Business Partner, the Chief Compliance Officer or the MSA Ethics Guideline. MSA will ensure the matter is reviewed and addressed.

**T H E M S A W A Y**

**Fair Treatment relates to all applicable phases of employment, such as:**

- Hiring, promotion, and termination of employment
- Determining wages and benefits
- Selection for training programs
- Tuition reimbursement and educational assistance
- Layoffs, recalls, and redundancies



Each MSA facility throughout the world maintains procedures and practices for **workplace safety**.

### A Safe Workplace

MSA is The Safety Company. While our commitment to safety is visible to our customers each time they wear or use our products, it starts with our own conduct each day. We are committed to ensuring the health and safety of all associates at all times while performing their responsibilities for the Company, without exception. Each MSA facility throughout the world maintains procedures and practices for workplace safety, including the use of personal protective equipment, and each associate is responsible for adhering to them. While workplace safety is a compliance requirement, it is really much more than that. As The Safety Company, we have a responsibility to set the benchmark for workplace safety and to set a strong and meaningful example outside of the workplace for our families and our communities.

MSA's pledge to workplace safety also includes a commitment to prevent workplace violence. This means that we will not tolerate threats, intimidation, or violent conduct. Prevention of workplace violence also means that weapons are not permitted on Company premises, in Company vehicles, or in personal vehicles parked on Company premises. In the event that you encounter what you think is an unsafe working environment, we expect you to report it to your manager or supervisor, your Human Resources Business Partner, the Company's Environmental Health and Safety Leadership team, the Chief Compliance Officer, or the Ethics Guideline.

*(See the Workplace Health and Safety Policy for more information)*

## THE MSA WAY

***Every associate throughout the world is expected to take personal responsibility for workplace safety, regardless of job function. What does taking personal responsibility for safety mean?***

- Understanding and adhering to corporate policies for safety
- Understanding and adhering to local safety requirements
- Knowing what you need to do in the event of a safety or security situation
- Intervening and taking action when seeing an unsafe condition or behavior
- Practicing safety throughout the day, such as holding handrails on stairwells, not using mobile devices while walking or driving, etc.
- Expanding that responsibility beyond work to include friends, family and others you encounter outside of work
- Following behavioral based safety principles every day!

Substance abuse threatens the well-being of **our associates** and the integrity of **our products**.



### Substance Abuse

Substance abuse threatens the well-being of our associates, the integrity of our products, and, as a result, our customers — it is wholly contrary to our mission. For that reason, among many others, substance abuse will not be tolerated at MSA. All MSA associates are expected to perform their jobs free from the effects of alcohol or drugs. This means that MSA

associates may not report to work, operate a company-provided vehicle or personal vehicle for MSA use, operate other MSA equipment, or conduct MSA business while under the improper influence of drugs or alcohol.

MSA maintains policies across the world setting forth the requirements with regard to substance abuse in greater detail,

### THE MSA WAY

A co-worker injured his finger on the production line today. It was not a major injury and our manager said that there is no reason to report it.

#### ***What should I do?***

You are obligated and required to report any and all workplace injury-related matters. In fact, depending on the incident, you may be obligated to report situations in which an associate even escaped injury (also known as a “near hit”). Among other reasons, reporting ensures that the Company can evaluate and improve its existing processes to prevent future incidents. Further, no one must ever discourage associates from speaking up, and your manager was wrong to do so.

addressing issues such as alcohol in one’s system while at work (from, for example, the night before); limited exceptions, such as the use of prescription medications; obligations if someone is subject to a drug-related arrest; and MSA’s right to testing. Please consult your Human Resources Business Partner for more information.



## MSA associates must refrain from discussing **confidential information** in **public forums**.

### **Confidential Information**

Our work at MSA often entrusts us with confidential Company information. By confidential information, we generally mean any non-public information that might be of use to competitors or others, information that would be harmful if disclosed, or information provided or entrusted to us that we have agreed to treat confidentially.

Every MSA associate is obligated to maintain the confidentiality of such information. This means that we must never allow others to improperly access the information, we must never improperly share the information, and we must always take care not to lose, misplace, or leave confidential information (or devices containing that information, such as a laptop or smart phone) unattended. MSA associates must also refrain from discussing confidential information in public forums or with other MSA associates that do not need to

know such information. Properly maintaining confidential information is critical to our Company's success.

*(See the Information and Data Security Policy for more information)*

### **Some examples of confidential information include:**

- Research and product development plans
- Product designs
- Marketing strategies
- Unpublished pricing information
- Personal data (such as health information and social security numbers)
- Unpublished financial results
- Merger and acquisition activity
- Non-public cyber security events
- Corporate investigations
- And much more!

### **T H E M S A W A Y**

Today I saw a coworker trip and fall in the parking lot. There was no serious injury so we both agreed there was no reason to report it.

#### **Was that correct?**

No. You are required to report all workplace injury-related matters. In fact, depending on the incident, you may be obligated to report situations in which an associate even escaped injury (also known as a "near hit"). Among other reasons, reporting ensures that the Company can evaluate and improve its existing processes to prevent future incidents. Further, no one must ever discourage associates from speaking up.



## Intellectual Property

At MSA, we spend significant resources creating and protecting our intellectual property. This intellectual property includes MSA's patents, trademarks, copyrights, and trade secrets. These are often referred to as "intangible assets" and include any ideas, inventions, processes, and designs created on Company time, at Company expense, using Company resources, or within the scope of our job duties. While intellectual property may appear in paper form, it is often stored and recorded in a variety of ways, such as through engineering documentation, Word documents, Excel documents, and other electronically stored information. Such work product, regardless of the form in which it is stored or presented, is the property of MSA. It is important that you follow MSA's Information and Data Security Policy to properly protect MSA's intellectual property.

Just as we expect others to respect MSA's intellectual property, we must also respect the intellectual property rights of others. This means that we never knowingly infringe the patents, trademarks, or copyrights of others. Associates must not download unlicensed software onto Company computers or duplicate, publish, or distribute copyrighted materials.

Associates must also not use or download songs, photographs, or videos without the consent of the rightful owner.

Whether you are dealing with MSA's intellectual property or the intellectual property of an MSA business partner, you must always ensure its proper treatment. In the event you suspect misuse of intellectual property, you must report it to your supervisor or manager, the Law Department, or the Ethics Guideline.

*(See the Information and Data Security Policy for more information)*

## Use of Information Technology

MSA recognizes the critical importance of technology in today's rapidly evolving global business environment. Technology like email, computer software, the internet, and electronic mobile and storage devices help us to perform our work more efficiently. Associates must be vigilant about the potential hazards of such technology, must use technology in a safe manner, and must do so in accordance with Company policies. This includes, for example, using secure networks and Company-approved devices to store information and work product related to MSA.

Use of Company technology must never be conducted in a manner that:

- Exposes the Company to cyber security risks
- Interferes with your or other associates' work responsibilities
- Involves personal business ventures or opportunities
- Is unlawful or does not comply with MSA policies and procedures

MSA maintains several policies that govern associate use of technology. Every associate is responsible for reading, understanding, and following those policies. Associates must promptly contact the Information Technology Department when unsure of the rules governing use of information technology.

*(See the Computer Network Usage Policy, the Mobile Communication Devices Policy, and Remote Network Access Policy for more information)*

## THE MSA WAY

Following are a few examples illustrating the prohibited use of information technology: Accessing graphic or sexually explicit material, clicking on suspicious, untrustworthy or dangerous links, downloading unauthorized software, attaching unapproved accessories such as flash drives to portable computers and similar devices, bypassing cyber security controls, and using Company communication devices to send threatening or harassing messages.



# 4 Our Business Partners

Business partners include customers, distributors, third-party representatives or agents, service providers and vendors.



Each day around the world, MSA associates interact with businesses and individuals not employed by MSA. We commonly refer to these entities and individuals as business partners. Examples of business partners include customers, distributors, third-party representatives or agents, service providers, vendors, and many more. This section includes topics that more commonly arise when dealing with business partners and sets forth the Company's expectations with respect to those dealings.

### Conflicts of Interest

Each of us is expected to act in a way that promotes the Company's best interests. Personal relationships with business partners and other outsiders must not cloud our judgment or ability

to act in a manner that is best for MSA. Those relationships must not harm the Company's reputation by creating a conflict of interest or appearance of impropriety. An easy way to test yourself is to ask these questions: How might others view my actions? What if my actions were printed on the internet or in the newspaper — would I be comfortable with that?

We are required to make business decisions based upon sound business judgment of what is in the best interest of MSA. A "conflict of interest" arises when our business judgment is clouded by our personal stake in a transaction. Conflicts or personal interests must not influence judgment, objectivity, or loyalty to the Company. Not only must we avoid actual conflicts

of interest, but we must also avoid occasions that might appear to create a conflict of interest. In many cases, the mere appearance of a conflict is significant enough to harm the Company's reputation or otherwise cause problems for you or the Company.

The best way to avoid a conflict of interest is to promptly disclose in advance any unusual conduct, transaction, or relationship and remove yourself from all business dealings between MSA and the business partner in question. In fact, associates must fully disclose any proposed activity that may create a conflict of interest before proceeding. In times of uncertainty, it is always better to disclose the potential conflict.

When disclosure is required, associates must inform both their supervisor and the Chief Compliance Officer of the potential conflict and seek direction before continuing.

An associate may own stock in a publicly traded company that does business with MSA as long as such ownership or business dealings are immaterial to MSA. When you are unclear about a particular transaction or relationship, it is best to seek guidance before acting by contacting your supervisor, the Ethics Guideline, or the Chief Compliance Officer.

Not only must we avoid actual conflicts of interest, but we must also avoid occasions that might appear to create a conflict of interest.

## THE MSA WAY

**The following are examples of conflicts of interest that are never permitted:**

- Giving or receiving improper gifts or gratuities
- Engaging in MSA business transactions with family members
- Engaging in personal transactions with MSA business partners on more favorable terms than are available to others
- Holding a material financial interest in an organization that has business dealings with MSA, while being involved in or overseeing such dealings
- Holding a substantial financial interest in an organization that competes with MSA
- And more!

### Concurrent Employment

MSA associates may wish to engage in work outside of our Company. We call this “concurrent employment.” Concurrent employment arrangements include forms of employment such as maintaining a second job, receiving compensation for speeches or presentations, or being engaged as a subject matter expert.

Concurrent employment arrangements run the risk of resulting in conflicts of interest and may also deter us from performing our responsibilities for MSA. Concurrent employment arrangements that prevent the associate from effectively carrying out his or her job responsibilities for MSA are strictly prohibited. All questions regarding concurrent employment should be directed to your local Human Resources Business Partner.

## THE MSA WAY

I am considering making an investment in a small distributor that resells safety products. This distributor is not planning on selling MSA products or products similar to those that MSA sells.

### ***Do I need to do anything?***

Yes. Contact your supervisor, the Chief Compliance Officer, or the MSA Ethics Guideline, as such an investment may present a conflict of interest. Do not make these determinations on your own. Further, it is always better to be proactive about these situations, so that if a conflict does arise, you have already informed the Company and appropriate remedial steps can be taken. If you are open and forthcoming with the Company, conflicts are often manageable.

## MSA associates must remain vigilant and report any potential corruption-related “red flags” that they encounter during their work.

### Bribery and Corruption

MSA has a strict policy prohibiting bribery and corruption. Such misconduct is illegal in virtually all countries throughout the world. MSA will not tolerate bribery or corruption and will always succeed and grow our business the right way.

For example, the U.S. Foreign Corrupt Practices Act (FCPA) and U.K. Bribery Act strictly prohibit companies and their affiliates from engaging in corrupt business practices. These and other laws are aggressively enforced and have harsh penalties for those who violate them, including prison sentences for individuals and severe penalties for companies.

These laws, and MSA policy, prohibit our associates from giving, authorizing, or promising to give anything of value to any person in order to improperly influence that person to assist MSA in doing business or obtain for us an improper advantage. It is also unlawful and against MSA policy to use a third party, such as a commission agent, third-party representative, or distributor, to carry out an act which would be unlawful for MSA to carry out itself.

MSA and its associates can be held responsible for the unlawful acts of our business partners if we should have reasonably suspected that they were involved in a corrupt practice involving the sale of our products.

MSA associates must remain vigilant and report any potential corruption-related “red flags” that they encounter during their work. For example, a commission agent who requests that we pay its commission up-front in cash should cause us to suspect wrongdoing. For this reason, MSA has an established process that qualifies third-party business partners before they become involved with or transact with our sales teams. MSA associates that evaluate, recruit and manage relationships with third-party business partners must always adhere to these due diligence procedures. Contact the Law Department if you have any questions about this process.

Often times, improper payments are disguised as gifts or gratuities. For this reason, it is important to follow MSA's established gifts and entertainment policies. Further details about acceptable gifts appear in the next section.



### THE MSA WAY

The two owners of a prospective business partner approached me at a trade show and told me that they could help MSA do business in a country known for high levels of corruption. They said that doing business through their company could help protect MSA from being accused of bribery.

#### *Is this true?*

No. In fact, the risk is often greater because we have less visibility and control over the activities of third-party business partners, which means we may be unaware of their corrupt activities. At the same time we could be held responsible for their improper behavior. This is because government enforcement agencies expect companies to know the qualifications and experience of their business partners and to avoid business dealings with corrupt businesses. For these reasons, MSA maintains a global business partner management process that must be followed for engaging third-party business partners involved in the sale of MSA products.



## Associates must never pay for the travel or related expenses of a government official without prior approval from the Law Department.

Because the FCPA and similar laws concerning bribery and corruption specifically target payments to non-U.S. government officials, we must take special precautions when dealing with these individuals. Keep in mind that government officials often include employees of “state owned enterprises” or “SOEs.” SOEs are organizations that appear to operate like a private business but have a level of government ownership or control. Never guess or assume whether an organization is or is not an SOE, and contact the Law Department to help you make this determination.

Associates must never pay for the travel or related expenses of a government

official without prior approval from the Law Department. The Law Department maintains an established process for requesting approval.

Finally, in addition to our Anti-Bribery/Anti-Corruption Policy, MSA also offers an Anti-Bribery/Anti-Corruption Resource Guide. Please see the policy and resource guide for more information on this topic. In the event you ever encounter concerns related to bribery or corruption, you must immediately contact the Chief Compliance Officer or the Ethics Guideline.

*(See the MSA Anti-Bribery/Anti-Corruption Policy for more information)*

### THE MSA WAY

I work in engineering and often deal with various approval agencies in foreign countries. An agency employee has asked for a payment so that the process can be expedited, and assured me that this is standard business practice.

#### ***What should I do?***

You must contact the Law Department if you ever have concerns over the legitimacy of a payment request, BEFORE you make the payment. The Law Department will help you decide whether the payment request is appropriate. Furthermore, MSA policy forbids “facilitation payments” without the prior written consent of the Chief Compliance Officer. A facilitation payment is a nominal payment typically used to cover routine government actions (processing governmental papers, securing government services, etc.).

---

***My colleague recently told me a story about an associate who, when traveling abroad, was threatened by a local border agent. The border agent would not let the associate leave the country unless a small cash payment was made. What should I do if I am faced with a similar situation?***

***In any instance where you believe your health and safety is in danger by refusing to pay money, you should make the payment. However, as soon as practical after you make such a payment, you must notify your business leader and the Chief Compliance Officer.***



### Gifts and Entertainment

Giving or receiving gifts and entertainment is a relatively common practice in many industries, cultures, and countries. Indeed, such gifts and entertainment can help us demonstrate our sincere appreciation of our business partners. However, it is wrong to attempt to influence the decision making of our business partners by offering them extravagant or improper gifts or entertainment. Likewise, our business decisions must always be based on what is best for the Company and must not be influenced by gifts or entertainment that are offered to us. We also must be mindful that giving extravagant gifts and entertainment can be construed as bribery. There are a few basic principles to keep in mind when giving or receiving gifts and entertainment.

First, MSA generally permits the giving (and receiving) of gifts and entertainment that are customary business courtesies and infrequent in occurrence. This approach

anticipates a broad range of business circumstances across the world.

Second, associates may only give or receive gifts and entertainment when doing so will not appear to obligate the recipient or prevent them from acting solely in the best interests of their own organization.

Third, MSA generally considers gifts and entertainment provided to a spouse or family member of an associate or a business partner to be a business gift. Therefore, such gifts are subject to the Code.

Fourth, gifts of cash, gift cards, or their equivalent are never permitted and, in all circumstances, gifts must comply with other applicable laws and MSA policies.

Business and geographic leaders are permitted to set local policies for their associates, provided such policies are at least as restrictive as the guidelines summarized above. All such local policies must first be approved by the Chief Compliance Officer.

### THEMSAWAY

Each time you consider accepting or giving gifts or entertainment, you must consider the following guidelines. Gifts and entertainment must be:

- Permissible under local law and Company policy
- Nominal in commercial value
- Connected to a legitimate business purpose
- Symbolic and customary in nature
- Not of a personal nature
- Infrequent in occurrence
- No cash or cash equivalents

When in doubt, contact the Chief Compliance Officer in advance for guidance.

## THE MSA WAY

Next week is a national holiday in my country and in celebration of this holiday I would like to give my top 10 customers a gift card to use during the local celebrations. The gift card would not be of a large amount, so it should not be a problem, correct?

### **No.**

Under MSA Policy, you are never permitted to give gifts of cash or cash equivalents, regardless of the amount. A gift card is considered to be the same as cash, since it has a monetary value and can be used to purchase goods or services.

## Our business decisions must always be based on what is **best for the Company.**

### **Loans**

Loans, while potentially well intended, create the potential for a conflict of interest. To avoid those conflicts, MSA associates may not lend money to any business partner or other individual who might have business dealings with MSA without obtaining prior approval from the Company. Such circumstances should rarely – if ever – arise, and all requests for approval must be submitted to the Chief Compliance Officer.

Just as lending money creates a potential conflict of interest, so does borrowing money. Therefore,

MSA associates and the members of their immediate family may not borrow money from individuals or organizations that conduct or may conduct business with MSA, either as a customer, channel partner, supplier, service provider, or other business partner. This prohibition, however, does not apply to public lending institutions, such as banks, savings and loan associations, or credit unions that might be business partners with MSA, provided that loans from such parties must not be made on more favorable terms than are generally available to others.



By investing their money in MSA, our shareholders have placed **a great deal of trust** in how we manage our business.

MSA is a publicly traded company. This means that we are owned by individual shareholders and virtually anyone can purchase our stock on the New York Stock Exchange. By investing their money in MSA, our shareholders have placed a great deal of trust in how we manage our business. For example, our shareholders rely on us to report financial and other information that is accurate and fair so that they can make informed decisions about MSA. The sections that follow discuss how “the MSA way” and our commitment to integrity is important to our shareholders.

### Accuracy of Books and Records

Shareholders, business partners, our fellow associates and other key shareholders rely upon us to provide accurate financial information to guide their decisions. Often, various government rules and regulations also require a great deal of precision in providing such information. As a result, we each have a responsibility to ensure that MSA’s books and records provide an accurate and fair reflection of all transactions and related information.

To ensure the accuracy of financial information and reporting, established accounting policies and procedures must be followed at all times. No false, misleading, vague, or distorted entries may be made in the books and records of the Company, and all such records must accurately reflect the substance

of underlying transactions or events. It is also important to understand that records such as expense reports, invoices, purchase orders and contracts are all considered supporting financial records and are subject to the same conditions. Whenever preparing or documenting these items, associates must never withhold or misrepresent information.

For further information about our accounting policies and procedures, we encourage you to contact the Corporate Controller’s office or your regional finance leader. If you suspect improper accounting practices, you must report the matter using the resources described in the Code.

### Fair Disclosure and Fraud

Associates are required to provide full, fair, accurate, and understandable disclosures in all MSA reports and documents submitted to any governmental authority or other persons outside or within MSA. Any intentional act to falsify, distort, or conceal any transaction or other requested information, whether material or immaterial, is highly unethical, often illegal, and generally constitutes fraud. Any associate who is aware of fraud or suspects that fraud may be occurring is required to immediately report the issue to their supervisor, the Corporate Controller, the Chief Compliance Officer, or the Ethics Guideline.

## THE MSA WAY

We recently won a large order. This order requires us to gain customer approval of our engineering drawings before shipment, but customer approval may take several weeks, which would delay shipment to the next quarter. My manager instructed me to ensure that we ship and invoice before the end of the current quarter without the customer’s approval so that we could record the sale for the Company. He said he would worry about the customer approval later.

### What should I do?

Accounting rules are very specific about when to recognize revenue for orders. Knowing that this customer’s acceptance of delivery depends upon its approval of our drawings, it is not proper to recognize this sale without the approval first being obtained. Therefore, you must inform your regional finance leader or the Ethics Guideline of your concern about this order to ensure that the Company’s books and records will be accurate.





### Insider Trading

The buying and selling of MSA stock is highly regulated. At the same time, maintaining the confidence of our shareholders and the public trading markets is very important to our continued success. We must at all times be aware of the rules and regulations governing the improper use of significant business information not known to the public. This is often referred to as “insider information.” In short, insider information is information about MSA that has not been disclosed to the public and that a reasonable investor would consider important in deciding whether to buy, hold, or sell MSA stock. Associates who possess insider information are not permitted to use or share that information for stock-trading purposes. The use of insider information for personal financial benefit or to “tip” others who might make an investment decision on the basis of this information is not only unethical and against MSA’s Insider Trading Policy, but it is also illegal. The consequences to the Company and to the individual can be severe.

A few examples of insider information are: unpublished financial results, information concerning potential mergers or acquisitions, the potential award of a large contract, important pending management changes in the organization, an undisclosed government investigation with potentially significant impact, unannounced significant cyber security incidents and other information that might impact the price of MSA stock.

Subject to blackout periods, as described in the MSA Insider Trading Policy, MSA associates can trade MSA stock as long as their decision to do so is in no way based upon their knowledge of insider information. Associates who have any doubt about whether they are subject to a blackout period or whether particular information has been disclosed to the public are obligated to contact the Chief Legal Officer prior to trading MSA stock.

*(See the MSA Insider Trading Policy for more information)*

## THE MSA WAY

Today, my manager returned from a meeting and told me the Company will be announcing the acquisition of a very large company sometime next week. My manager told me the information is very confidential and cannot be discussed until the Company announces the acquisition next week. I was already planning to buy some MSA stock on the open market.

### ***Can I still do so?***

No. A large acquisition is an example of something that could be considered “insider information.” Trading while in possession of insider information is strictly prohibited. In the example above, you should not engage in any MSA stock transactions until the acquisition is announced. Otherwise, it could be determined that you purchased the MSA stock before the acquisition announcement because you believed the stock price might increase after the announcement, making it more costly for you to later purchase the stock. Associates concerned about whether they may properly trade MSA stock must contact the Chief Legal Officer before proceeding.



Associates are obligated to take reasonable steps to safeguard assets entrusted to them, and **associates may never use Company assets to benefit an interest other than that of MSA.**

### Use and Protection of Company Assets

In many instances, MSA associates are entrusted with numerous and valuable Company assets. Not only do associates have access to financial assets, such as bank accounts, but, in many circumstances, they also have possession of equipment, vehicles, inventory, office supplies, and intellectual property, such as trade secrets. Associates are obligated to take reasonable steps to safeguard assets entrusted to them, and associates may never use Company assets to benefit an interest other than that of MSA. Abuse, theft, fraud, embezzlement, or disclosure (in the case of intellectual property) of MSA assets is strictly prohibited.

### Audits

MSA maintains a robust auditing process, which includes internal, external, taxation, and other governmental audits. We are all

required to support and cooperate fully with our auditors, whether internal or external. All information disclosed to auditors must be complete, accurate, and in accordance with applicable law, the disclosure requirements set forth in this Code, and related Company policies.

Any proposal to retain an external auditor or other financial services firm to perform any financial services work must be directed to MSA's Corporate Controller. The Corporate Controller must provide prior written approval before any external audit or tax firm is contracted to perform services.

### Corporate Opportunities

You may not use information gained in the course of performing your job responsibilities to take personal advantage of any MSA business opportunity. Such opportunities must first be disclosed to the Chief Compliance Officer for prior approval.

## THE MSA WAY

I saw my coworker stealing supplies last week. It wasn't any big deal, just some flash drives, pens and notepads.

### What should I do?

The theft of Company assets, regardless of their value, will not be tolerated. Also, the cumulative impact of minor theft may cost the Company thousands of dollars each year. If you ever witness or suspect theft in the workplace, you are required to report it using the methods described in this Code.



An “export” includes not only the shipment of a product outside the U.S., but also the exportation of technologies and services.

### Exporting Our Products and Technologies

A number of U.S. laws govern the way we conduct certain transactions with foreign countries and specific parties. These laws apply to U.S. operations, U.S. persons (wherever located), and products manufactured around the world using U.S.-origin parts or technology. Many countries also have their own similar laws.

For example, U.S. law requires that an export license must be obtained before certain MSA products, technologies, or services can be exported, re-exported, or otherwise transferred outside of the United States. An “export” includes not only the shipment of a product outside the U.S., but also the exportation of technologies and services associated with U.S. products. An “export” can also be defined as a “deemed export,” which is the exportation of U.S. products and technologies to non-U.S. nationals while they are inside the U.S. The consequences

are severe for exporting products, technologies, or services in violation of these U.S. laws. While MSA has export control processes, technologies, and services in place to control our exports and acquire export licenses, associates should contact the Law Department when unsure of whether a particular product, technology, or service is subject to a U.S. export, re-export, or transfer license requirement.

The U.S. government also enforces numerous economic sanctions and embargoes against specific countries, entities, and individuals. These sanction and embargo programs apply to the activities of U.S. citizens, U.S. residents, and subsidiaries of U.S. companies, no matter where located, and, in some cases, they are also applicable to the activities of MSA international affiliates which are not U.S. companies. The MSA U.S. Trade Sanctions Compliance Policy contains a list of countries with which no MSA

## THE MSA WAY

We received a large order from a company overseas that we have never sold to before.

### ***Do I need to do anything before I can sell/export our products to this customer?***

Yes. There are “user export controls” that must be reviewed. These are end-user export prohibitions or restrictions that apply to certain individuals and companies specified by the U.S. government. Several U.S. government agencies produce lists containing the names and locations of these people and companies. MSA must screen the names of our buyers and the names of their end users against each of these restricted persons lists before completing a proposed export transaction from the U.S. Contact the Law Department with any questions before proceeding.

Company may conduct business.

A full list of economic sanctions and embargoes can be obtained through the Law Department.

Associates who have knowledge or suspicion of any transaction that may be in violation of either the above laws or related Company policies must promptly report it to the Law Department, the Chief Compliance Officer, or the Ethics Guideline.

*(See the MSA Import/Export Compliance Policy and U.S. Trade Sanctions Compliance Policy for more information)*

The Company will never tolerate deceptive, misleading, or false advertising or promotional material.

### Advertising and Promotion

MSA is a global leader in our industry for many reasons, but most importantly, because our customers and stakeholders can trust us to provide high-quality products and services. We maintain our reputation for excellence by being honest and straightforward in our advertising and promotional activities. Accordingly, the Company will never tolerate deceptive, misleading, or false advertising or promotional material.

### Antitrust and Fair Competition

U.S. antitrust laws, as well as similar laws and regulations throughout the world, are intended to promote fair competition. MSA believes in free and open competition and will not tolerate any conduct by our associates that attempts to create an unlawful advantage. In short, we will comply fully with all applicable laws related to competition.

Violations of these laws can result in severe consequences to individuals as well as the Company, including criminal prosecution and substantial fines and penalties. Any questions or concerns must be directed to the Law Department or the Ethics Guideline.

MSA is regularly involved in formal trade groups and other associations in which our competitors also participate. When used properly, these organizations are lawful and valuable tools to our continued success. However, we must always exercise caution when participating in such groups. Among other things, we must ensure each meeting or other gathering is properly sanctioned by a sponsoring body (such as the NFPA or ISEA), insist in advance that a written agenda is established and followed, and require that the sponsoring body's legal counsel or compliance expert is involved in the meeting planning. We must avoid meetings with competitors other than as part of sanctioned trade association activities; the mere appearance of impropriety can result in potentially serious consequences.

Finally, in addition to our Antitrust and Competition Law Compliance Policy, MSA also offers an Antitrust and Competition Law Compliance Resource Guide. Please see the policy and resource guide for more information on this topic. In the event you encounter concerns related to antitrust and competition law compliance, you must contact the Chief Compliance Officer or the Ethics Guideline.

## THE MSA WAY

### **Among other things, MSA associates must never:**

- Enter into any formal or informal understanding with a competitor regarding the prices we will charge for our products or the markets in which we will sell.
- Engage in the practice of agreeing with a competitor on who will submit a low or high bid, or whether one of us will forego bidding, on a particular contract. This is sometimes referred to as contract bid rigging, and it is unlawful.
- Solicit or accept competitive intelligence from a competitor.

---

***Did you know? In some instances, an MSA distributor might be considered to be our competitor, requiring you to exercise greater care. For example, the Company sometimes sells its products to distributors who are solely authorized in a particular territory. In such a situation, if an end-user customer asks MSA to bid direct in order to satisfy the customer's own competitive bidding requirements, we are being placed in competition with our own distributor. For that reason, we must avoid bidding direct to a customer when an MSA distributor is already involved in the same business opportunity.***



### **Environmental Compliance and Sustainability**

Not only is MSA dedicated to compliance with all applicable environmental laws, but we are also committed to conducting our business in a manner that protects our natural resources and promotes sustainable business practices. This dedication encompasses the integration of sound environmental and sustainability practices into our business decisions, such as responsible supply chain sourcing, lean manufacturing, product stewardship, and responsible waste management.

Accordingly, MSA associates are expected to know and follow all applicable federal, state, provincial, and local environmental laws and regulations and Company policies and procedures. Each MSA facility throughout the world is responsible

for ensuring compliance with all such applicable laws and regulations. Facilities must obtain regulatory permits when required and must understand and follow the terms, conditions, and reporting requirements of all permits they hold.

In addition, we continually strive for source reduction and must ensure that all waste is stored, transported, and disposed of in accordance with applicable laws and MSA standards. We also understand that we must respond appropriately to any spill or release, in accordance with existing Company procedures. When you encounter any questions or concerns about compliance with environmental laws or regulations, contact the Company's Environmental, Health and Safety Manager or the MSA Ethics Guideline resource for guidance.

### **T H E M S A W A Y**

We are changing a manufacturing process in my facility and it includes the discharge of waste water. One of the other technicians told me to connect the discharge hose to a nearby floor drain. I asked him if our supervisor was OK with it, and he told me not to worry about it.

#### ***Should I be concerned?***

Yes. If you believe he told you something wrong, you should address it with your supervisor, your Human Resources Business Partner, the Manager of Environmental, Health and Safety, or the Ethics Guideline resource. The Company is committed to protecting the environment and maintaining strict compliance with laws and regulations.



## Social Responsibility and Citizenship

### Data Privacy and Security

MSA receives and generates personal data in the course of its business operations. Personal data is broadly defined as any information that identifies or relates to a natural person, and it includes a person's name, e-mail address, and geographic location. Personal data can come from any number of sources, including employment records. MSA is committed to processing all personal data, including protected personal data (e.g., social security numbers; health information), in a secure manner and in accordance with applicable law. For personal data coming from the European Union, MSA may be subject to specifically defined obligations, and the Company has designed specific policies and procedures for handling such data.

MSA associates must never solicit, store, access, share, or erase personal data unless done so with a legitimate business purpose and in accordance with

applicable law and Company policy. All associates exposed to personal data in the course of their job duties are required to take measures to ensure its protection, such as using passwords and encryption methods as required by applicable law and Company policies and procedures.

In addition, associates must never leave personal data or other confidential information in an unsecured manner. Similarly, Company-issued devices (such as smartphones, smart tablets, and personal computers) must be maintained in a secured manner, including the use of passwords on all such devices.

MSA associates are obligated to report any actual or suspected breach or risk to personal data. If you have questions about what constitutes personal data or how MSA handles such data, contact the Law Department or your Human Resources Business Partner.

*(See MSA's Master Information Security Policy for more information)*

### Human Rights and Labor Laws

As part of our commitment to integrity, MSA places the highest value on the dignity, safety, and health of all MSA associates and those of our business partners – in fact, this is the core of our Company mission. Accordingly, MSA will not tolerate any form of human rights abuse, and will not conduct business with those who fall short of our standards of integrity. MSA maintains specific policies and procedures to ensure our supply chain partners are good corporate citizens.

MSA is committed to compliance with all applicable wage and labor laws. We do not engage in, and will not conduct business with supply chain partners who engage in child labor, trafficking, or who avoid paying lawful wages.

### Corporate Citizenship and Sustainability

We strive to make an impact beyond our bottom line. To that end, the Company is committed to engaging with our surrounding communities through

## We are committed to conducting our business in a manner that is **environmentally sustainable**.

charitable giving and volunteer work to build a strong and healthy atmosphere for our business operations. MSA associates are encouraged to participate in Company-sponsored activities that support and improve the communities in which we operate. Such involvement may include joining Company-organized fundraising efforts or charitable events, participating on MSA committees promoting diversity and inclusion, participating in Company-organized community volunteer efforts, and other activities.

We are also committed to conducting our business in a manner that is environmentally sustainable and ensures the protection of our natural resources. For example, we seek waste reduction, energy use reduction and recycling opportunities when possible. Continuous improvement of our global processes is managed through the MSA Operating System and our environmental management systems.

### **Telling Our Story**

On occasion, MSA associates may receive inquiries from media outlets (or persons connected to the media) asking about our business. Although these inquiries might seem insignificant, they could involve information that is regulated by the U.S. Securities and Exchange Commission, as well as various other laws. If someone from the media contacts you and/or asks you about our business, please do not attempt to answer these questions without first

consulting with MSA's Director of Public Relations and Strategic Communications, or MSA's Director of Investor Relations.

If you have been authorized to speak with the media, make sure that the information you provide complies with all MSA policies, including MSA's Media Inquiries Policy, as well as the Code, and does not provide an unfair advantage to one individual or entity over another.

*(See the MSA Media Inquiries Policy for more information)*

### **Social Media**

Used responsibly, social media platforms like Facebook, Instagram, LinkedIn, YouTube, and Twitter can provide the Company an effective way to reach key stakeholders. MSA associates are encouraged to use social media to appropriately further the Company's business. However, the conduct of associates using social media for business purposes reflects upon themselves and the Company. Accordingly, all use of social media for Company purposes must be truthful, respectful, professional, and in accordance with the Company's core values, the Code, other Company policies, and the Company's Social Media Guidelines. MSA associates must be aware that everything said or done on social media is public and may be seen by anyone with access to the Internet. For that reason, it is important that MSA associates adhere to the values of the Company when using

social media for business purposes, and use caution to protect the reputation of both MSA and its associates. Contact the Director of Public Relations and Strategic Communications with any questions about the proper use of social media for Company purposes.

*(See the MSA Social Media Guidelines for more information)*

### **Waivers of the Code**

Any waiver of the Code must be pre-approved in writing by the Chief Executive Officer, and when required, the MSA Board of Directors, and be promptly disclosed as required by law or regulation. Such circumstances should rarely – if ever – arise, and waivers will only be granted where appropriate and consistent with applicable law and MSA's spirit of integrity.

### **Follow Us:**



# MSA Ethics Guideline Telephone Numbers

The MSA Global Code of Business Conduct

## **ARGENTINA** | *Spanish/English*

First dial access code 0-800-555-4288.  
Then dial 800-253-5534.

## **AUSTRALIA** | *English*

Dial Optus access code 1-800-551155  
or Telestra access code 1-800-881-011.  
Then Dial 800-205-5119.

## **AUSTRIA** | *German/English*

First dial access code 0-800-200-288.  
Then dial 800-504-1785.

## **BELGIUM** | *English*

First dial access code 0-800-100-10.  
Then dial 800-205-5119.

## **BRAZIL** | *Portuguese/English*

Dial 0-800-891-4126.

## **CANADA** | *English*

Dial 1-800-205-5119.

## **CHILE** | *Spanish/English*

First dial access code 800-225-288.  
Then dial 800-253-5534.

## **CHINA** | *Mandarin/English*

Dial 10-800-110-0563.

## **COLOMBIA** | *Spanish*

First dial access code 01-800-911-0011.  
Then dial 800-253-5534.

## **CZECH REPUBLIC** | *Czech/English*

Dial 800-143-023.

## **DENMARK** | *English*

First dial access code 800-100-10.  
Then dial 800-205-5119.

## **EGYPT** | *English*

First dial access code 2510-0200 (in Cairo)  
or 02-2510-0200 (all other areas).  
Then dial 800-205-5119.

## **FRANCE** | *French*

Dial 0800-90-59-38.

## **GERMANY** | *German/English*

Dial 0800-1826439.

## **HONG KONG** | *English*

First dial access code 800-93-2266.  
Then dial 800-205-5119.

## **HUNGARY** | *Hungarian/English*

Dial 06-800-12927.

## **INDIA** | *Bengali/English*

First dial access code 000-117.  
Then dial 800-365-1534.

## **INDONESIA** | *English*

First dial access code 001-801-10.  
Then dial 800-205-5119.

## **IRELAND** | *English*

First dial access code 1-800-550-000  
or 00-800-222-55288.  
Then dial 800-205-5119.

## **ITALY** | *Italian/English*

Dial 800-788631.

## **JAPAN** | *Japanese/English*

IDC: 0066-33-801272  
Softcom: 0044-22-112676  
KDD: 00531-11-5087  
All others: 0034-800-900162

## **KAZAKHSTAN** | *English/Russian/Kazakh*

First dial access code 8-800-121-4321.  
Then dial 866-455-0427.

## **MALAYSIA** | *English*

First dial access code 1-800-80-0011.  
Then dial 800-205-5119.

## **MEXICO** | *Spanish/English*

First dial access code 01-800-288-2872.  
Then dial 800-253-5534.

## **MOROCCO** | *Arabic*

First dial access code 00-211-0011.  
Then dial 888-507-5625.

## **NETHERLANDS** | *English*

First dial access code 0800-022-9111.  
Then dial 800-205-5119.

## **PERU** | *Spanish/English*

First dial access code 0-800-50-288.  
Then dial 800-253-5534.

## **POLAND** | *Polish/English*

Dial 0-0-800-111-1673.

## **ROMANIA** | *English*

First dial access code 021-800-4288.  
Then dial 800-205-5119.

## **RUSSIA** | *Russian*

In Moscow, first dial access code 8-495-363-2400.  
In St. Petersburg, first dial access code  
8-812-363-2400. For all other areas,  
dial 8 for dial tone, then 10-800-110-1011.  
After prompt in English, dial 866-455-0427.

## **SINGAPORE** | *English*

First dial access code 800-011-1111  
or 800-001-0001. Then dial 800-205-5119.

## **SOUTH AFRICA** | *English*

First dial access code 0-800-99-0123.  
Then dial 800-205-5119.

## **SPAIN** | *Spanish/English*

First dial access code 900-99-0011.  
Then dial 800-253-5534.

## **SWEDEN** | *English*

First dial access code 020-799-111.  
Then dial 800-205-5119.

## **SWITZERLAND** | *German/English*

First dial access code 0-800-89-0011.  
Then dial 800-504-1785.

## **THAILAND** | *Thai*

Dial 001-800-11-002-2990.

## **UNITED ARAB EMIRATES** | *English*

First dial access code 800-05-55-66 or  
8000-0-6-1. Then dial 800-205-5119.

## **UNITED KINGDOM** | *English*

First dial access code 0-800-89-0011.  
Then dial 800-205-5119.

## **UNITED STATES** | *English/Spanish*

Dial 800-205-5119.



**Regardless** of the option you might

choose to report your concerns,

**you have our full commitment**

that the Company will not, under any  
circumstances, permit retaliation against you

for raising your good faith concerns.

MSA Ethics Guideline online reporting tool

[www.msasafety.com/ethicsguideline](http://www.msasafety.com/ethicsguideline)



*The Safety Company*

1000 Cranberry Woods Drive  
Cranberry Township, Pennsylvania 16066, U.S.A.

724-776-8600  
1-800-672-2222

[www.MSAafety.com](http://www.MSAafety.com)