

## 1.0 Applies to

This policy applies to Mattr employees worldwide and all other persons acting on behalf of Mattr ("Employees").

## 2.0 Introduction

Mattr encourages all Employees to be champions and role models in representing the company. Mattr has a leadership value focused on representing the best. As the communication landscape continues to evolve, it creates new opportunities for personal expression but it also creates new responsibilities. Communication in all forms can pose risks not only to Mattr's confidential and proprietary information, but also to the reputation of Mattr and its Employees.

Adherence to this policy will help protect Mattr and Employees from the negative consequences of improper communication.

## 3.0 Policy Statements

### Communication

- Communication in all media, including social media, blogs, interviews, presentations, proposals, written correspondence, phone conversations and in-person discussions must be appropriate for the issue and audience.
- All communications must be professional and must not include proprietary, company confidential, competitive sensitive information or privileged information related to any legal matters unless it is "in necessary course of business". Refer to Mattr's **Code of Conduct and Intellectual Property Standard**.
- If an Employee receives communication which is discriminatory or harassing in nature which potentially violates the **Code of Conduct** or other Mattr policy, the Employee must notify their direct manager or Human Resources department.

### Social Media<sup>2</sup>

- Employees are encouraged to participate on Mattr-approved social media sites and represent themselves and sources in a clear and truthful manner. If opinions are provided, it must be in areas of subject expertise and first-hand knowledge.
- Employees must identify themselves accurately as Employees and representatives of Mattr using approved positions titles and credentials. Employees no longer affiliated with the Company must reflect themselves accordingly on social media. Refer to Mattr's **Social Media Guidelines**.

## Authorized Media and Investor Spokespersons

- Discussions with potential or current shareholders, media (e.g. reporters and writers) and investment firms (e.g. analysts, fund managers and bankers) or other interested parties regarding company matters must only be conducted by authorized spokespersons.
- The only positions authorized to disclose material non-public information (as defined in **Securities Acts' Full Disclosure Standard**) to any person or organization are the President and Chief Executive Officer ("CEO") and the Senior Vice President, Finance & Chief Financial Officer ("CFO") of Shawcor or their authorized designate. All requests for non-public information, interviews, confirmations or commentary must be immediately referred and/or directed to an authorized spokesperson.

## General Company Disclosure

- Employees must not discuss company matters which consist of material non-public information related to Shawcor with any person including family and relatives, friends, business associates or other individuals.

Violations of this policy will result in progressive discipline, up to and including termination of employment, and other remedies deemed appropriate by Mattr to protect its interests.

## Related documents/Definitions

Code of Conduct, SC-LEG-PLCY-001

Global IT Acceptable Use and Security Policy, SC-IT-PLCY-001

Intellectual Property Standard, SC-LEG-STD-001

Brand Standards, SC-MKTG-STD-001

Social Media Guidelines, SC-MKTG-GL-001

Disclosure of Material Matters Standard, SC-FIN-STD-3010

Securities Acts' Full Disclosure Standard, SC-FIN-STD-7015

<sup>1</sup> Employees – Refers to all Mattr employees worldwide and all other persons acting on behalf of Mattr and agents of Mattr

<sup>2</sup> Social Media – Any tool or service that facilitates conversations over the internet; it applies to traditional big names such as Facebook, Twitter, and We Chat but also to platforms such as YouTube, Flickr, blogs and wikis

# Supplier Compliance Statement

## Bribery and Corruption

Mattr is committed to ethical business practices and, in particular, to compliance with applicable anti-corruption and anti-bribery laws. Mattr does not accept bribes and does not offer bribes to government officials or other parties.

Suppliers are also expected to comply with applicable anti-corruption and anti-bribery laws and are prohibited from offering or taking any bribe or kickback

## Anti-Trust/Competition Compliance

Mattr is committed to promoting and safeguarding competition and deterring anti-competitive behaviour. Suppliers are expected not to engage in any act that improperly reduces competition.

This includes any efforts to fix, coordinate, maintain or stabilize prices, terms of sale or production/output levels, or to allocate customers or markets through any agreement, arrangement or understanding of any nature, whether written or oral, express or implied, with a competitor or potential competitor.

## Communication

All communications made by Suppliers are expected to be professional and should not include proprietary, confidential or competitively sensitive or privileged information related to any legal matters unless approved by Mattr.

The use of Mattr related materials such as photos must be approved by Mattr. When engaging in discussions about Mattr in social media, Suppliers are expected to represent Mattr and themselves in a clear and truthful manner.

## Employment and Labour

Mattr is committed to respecting human rights and adhering to local labour laws and requirements in the jurisdictions in which it operates.

Suppliers must perform their work and demonstrate workplace conduct that is free from discrimination and harassment and may not discriminate based on gender, race, ethnicity, religion, disability and any other characteristics protected by law.

Suppliers must ensure that their working hours and conditions comply with applicable wage laws, labour regulations and codes.

## Child and Forced Labour

Suppliers must not engage in the use of child or forced labour and must comply with all applicable human rights laws and regulations related to the legal working age.

Mattr does not employ people under the age of 18 at its operating sites and prohibits the use of forced or compulsory labour, human trafficking and forms of modern slavery at any of its operations and expects the same of its Suppliers.



## Freedom of Association

Suppliers must recognize the principle of freedom of association as it exists under applicable laws and regulations in the jurisdictions in which they operate.

## Consultant Insurance

Mattr values an environment where businesses can work comfortably, knowing that all parties are covered if potentially damaging circumstances were to arise.

Mattr expects Suppliers, such as consultants, to carry appropriate insurance coverage for the work they perform.

## Demonstration of Compliance

The provisions contained in this Statement form part of any agreement between Mattr and its Suppliers.

Suppliers must demonstrate compliance with these provisions at the request of and the satisfaction of Mattr. If a Supplier fails to comply, it is expected to implement immediate and continuous improvement actions.

Mattr may terminate any agreement with a Supplier which cannot demonstrate compliance with this Statement.

Furthermore, if Mattr becomes aware of a situation where a Supplier is violating laws or regulations, we will make the necessary disclosures to law enforcement or regulatory authorities.

## Related Policies

- Mattr – Global Code of Conduct\*
- Mattr – Global HSE Policy\*
- Mattr – Human Rights Statement\*

\*Available on Mattr.com website