



ETHICAL CODE OF CONDUCT

INTRODUCTION:

The Code of conduct applies to all employees of MCL or any of its affiliates or subsidiaries. You are expected to act lawfully, honestly, ethically, and in the best interests of the company while performing duties on behalf of MCL. The Employee Handbook contains the guidelines for business conduct required of you. Any person who is unsure of their obligations should contact Human Resources. This code is subject to change and may be amended, supplemented, or superseded by one or more separate policies.

PRIORITY BETWEEN APPLICABLE LAWS AND CODE OF CONDUCT:

If any part of the code of conduct conflicts with local laws or regulations, only the section of this code permitted by applicable laws and regulations will apply. Any policies that are specifically applicable to your jurisdiction will take precedence to the extent they conflict with this code.

MISSION STATEMENT:

Mancuso Chemicals Ltd., a worldwide supplier of industrial chemicals for the foundry, steel mill, paint and automotive industries, are committed to providing the highest level of Quality of Product to our customers. We consider this goal achieved when the requirements expressed by our customers are satisfied by having provided them with product that is fit for their purpose and needs. This mission is furthermore covered by the ethos of achieving this in an ethical manner.

ETHICAL VALUES:

All actions undertaken at MCL will be conducted based on a set of principles. Mutual Respect will be shared amongst employees and guests. Any harassment/sexual harassment and/or child and slave labour will be condemned immediately. This is a diverse work environment and it is wise to see the value in that. Complete compliance is expected with legislation, policies, rules, instructions and contracts. There will be respect for the confidentiality and/or transparency of information on a case by case basis. Health and safety practices will always be promoted at work. MCL is committed to upholding the standard in it's surrounding environment and communities.

ETHICAL GUIDELINES:

Every employee is responsible for being familiar with the relevant laws, regulations and Company policies and procedures that govern the business activities in which the employee engages. MCL stands by this because it wants to be an exemplary corporate citizen in our community, in our country and across any market we do business in. To that end we expect that each employee comply with a most stringent interpretation of the legal norms in your local jurisdiction. While not limited to the following, these areas of global concern are summarised as follows.

Work only with suppliers that uphold MCL's values and high integrity standards. Do not permit or engage in bribery or corruption of any kind. Always know what you are exporting, its destination, the end user, and the end use. Be sure to provide Customs with complete and accurate import/export documentation. Always know your customer and be alert to any possible illegal activity. Do not enter into any agreement with competitors that deprives customers the benefits of competition. Always make business decisions based on what is best for MCL, never what is best for you personally. Every employee has a responsibility to safeguard MCL intellectual property – it is the key to our competitive advantage. Every employee has their rights enshrined in the Canadian Charter of RIGHTS and FREEDOMS – and this applies to both your working conditions as well as your well-being. MCL will not under any circumstances do business with any company that engages in any child labour, human trafficking, forced or compulsory labour.



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FOUNDRY – COATINGS – STEEL MILLS – AUTOFLUIDS – ELECTROLYTES
NORTHERN CHEMISTRY. GLOBAL REACH. UNIVERSAL RESPONSIBILITIES.



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ETHICAL BREACH CONSEQUENCES:

Failure to comply with expected ethical values and behavior will have consequences such as disciplinary measures for employees and the review of commercial relations between MCL's partners. On a corporate level, we include ethical breaches within the normal 3 step discipline structure: written warning, suspension, termination with cause. However, ethical breaches often result in the need to involve government authorities and their reviews may result in judicial processes that are outside the scope of MCL's daily operations.

COMMUNITY INVOLVEMENT:

MCL is committed to providing support for our local and global communities including:

Gold Sponsor of Niagara Regional Science and Engineering Fair.

Proud supporter of Pirchei Agudath Israel, Montreal Chapter.

Member of Niagara Industrial Association.

Member of CAER Group (Chemical Safety).

Sponsor of employee basketball, volleyball and bowling teams.

Sponsor children through World Vision for 24 years. Outreach includes Kenya, Bangladesh, Malawi, Philippines, Peru, Bolivia, Sierra Leone.

COMMUNICATION:

If you become aware of anything that is contrary to codes listed in this document, please report it by contacting:

info@mancusochemicals.com



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Intertek

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