MSA
The Safety Company

Inspire Integrity

Global Code of Business Conduct



Our Foundational Value is Integrity

We do the right thing, in the right way, every day – regardless of the business consequence.

A Message from Our President and CEO

Our commitment to protect people and make our world a safer place to live and work drives all we do and how we work. This means doing the right things in the right way. To earn and maintain the trust of our stakeholders, we follow the highest set of ethical standards in all aspects of our work. We are committed to promoting ethical business practices and complying with all applicable laws and regulations wherever we operate. To that end, we maintain this Global Code of Business Conduct (the "Code") to guide us in our actions each day.

To sustain our long-term success, we must remain focused on operating our business with uncompromised integrity. Integrity means doing the right thing, the right way, every day, regardless of the business consequences, even when no one is looking. While the Code will not tell you everything you need to know about the laws that apply to our business, it provides an overview of our expectations related to key ethics and compliance topics and offers a variety of resources to support you, including our Ethics Guideline reporting tool.

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.

The Code explains how we demonstrate integrity in our business dealings, how we communicate honestly and transparently, and how we act as professionals.

When unsure how to proceed in a particular situation, all associates must discuss concerns with their supervisor, functional business leader, our Law Department or any of the other resources described in this Code BEFORE acting. Regardless of a chosen path, MSA will not allow any form of retaliation for raising a concern in good faith. Associates have my commitment on that!

And, always remember the mission of MSA – that men and women may work in safety, and that they, their families and their communities may live in health throughout the world.

Thank you for staying true to our mission, caring for those around you, and for your continued commitment to our foundational value – Integrity. I am proud that you are part of the MSA family.

Sincerely,

Steve Blanco
President and CEO



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Introduction and How to Use the Code

Culture of Integrity

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

Why does MSA have a Code?

At MSA, acting ethically and responsibly is not only the right thing to do, it's also the right thing to do for our business. All associates and business partners must follow the Code in all dealings, without exception. The Code sets forth our core obligations and expectations for ethics and compliance. The Code uses examples, and identifies resources to assist us in understanding our obligations, reporting suspected misconduct, and to guide us in making decisions each day.

We are all accountable for our actions and to behave ethically under the Code, so it is crucial that associates read, understand, and follow it. The Code does not cover every applicable law or every workplace situation that may arise. The Code should be used as a resource regarding the conduct that is expected of you and where and when to report concerns. For additional guidance, please seek advice from a member of MSA's Ethics and Compliance Team within the Law Department.

Why does the Code reference other documents?

The Code is supplemented by detailed Company policies that explain rules and responsibilities for important topics. The Code and other policies will be updated so associates must be sure they are aware of the most current obligations that apply to their activities. It is the obligation of each associate to understand the current version of the Code and other Company policies.

Who does the Code apply to?

All MSA associates throughout the world are required to follow the Code without exception. Our vendors, channel partners, third-party sales representatives, and others 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 must I do if I suspect that the Code is not being followed?

You are obligated to promptly speak up if you believe the Code is not being followed by any associate or third party working with MSA. The next section identifies resources to help you report concerns anonymously. MSA treats reports with seriousness and sensitivity and prohibits retaliation against associates who raise their concerns in good faith.

What are the 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. 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, local law must be followed.

Our Reporting Obligations and Resources

Speak up when something does not seem right.

Simply put, you must speak up when something does not seem right, whether involving an associate or a third party. 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. Each of us must act with integrity to both enhance MSA's longstanding reputation and maintain a healthy work environment. Speaking up and informing the Company of your concerns when they arise will allow us to quickly address any issues while also preserving our good name before they become more serious.

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 have a question or concern about your obligations under the Code, Company policies, or the law, you must seek guidance BEFORE acting.
- If you suspect a possible violation of the Code, other Company policies, or the law, you have an obligation to promptly report it.

Who can help?

- Your supervisor or manager
- Your geographic or functional business leader
- Your local or regional Human Resources People Experience Advisor
- The Ethics and Compliance Team within the Law Department
- The Internal Audit Department
- The Chief Compliance Officer
- The MSA Ethics Guideline

The MSA Ethics Guideline is a telephone and internet resource available to associates 24 hours a day, 7 days a week.

Use the Ethics Guideline when concerned about:

- Conflicts of interest
- Improper gifts or benefits
- Improper accounting practices
- Fraud or theft
- 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

MSA Ethics Guideline

The Ethics Guideline is available online and by telephone, 24 hours a day, seven days a week (refer to telephone numbers listed on the Ethics Guideline website, through the QR code on this page, or as shown on the last page of the Code). The Ethics Guideline is administered by an independent third party that uses specialists speaking your local language, and the internet tool is available in your local languages.

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 using your report key and password.

How Ethics Guideline Reports are Routed and Reviewed

Reports to the Ethics Guideline are forwarded directly to the Ethics and Compliance Team within the Law Department and are routed to appropriate personnel for review and investigation. All reports are also provided to the Chief Legal Officer and the Chief Human Resource Officer, ensuring executive awareness of all matters. Reports that implicate any member of the Executive Leadership Team are managed through a separate process that has been approved by the Audit Committee of the Board of Directors.

Respecting Confidentiality

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

The Company will not, under any circumstances, allow retaliation against associates for raising a concern in good faith. Retaliation can take many forms, including, but not limited to, altering job responsibilities or compensation and 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 Ethics Guideline is a reliable, trusted way to ask questions or voice concerns about conduct that might violate the Code. You can contact it in any of the following ways:

By Telephone

Speak with a professional operator in your local language who will provide a written report of your concerns to MSA. Scan QR code for a list of numbers or refer to the last page of the Code.

Online

Submit a summary of concerns or questions through a secure website: www.msasafety.com/ethicsguideline

U.S. Mail

MSA
Law Department
1000 Cranberry Woods Drive
Cranberry Township, Pennsylvania 16066, U.S.A.
Attention: Manager Global Compliance

Email

integrity@msasafety.com

Please note that due to privacy laws in certain countries and the European Union, the MSA Ethics Guideline may permit only specific types of reports, such as accounting, financial, or auditing and bribery matters. In those countries, contact your direct manager, next level manager, Human Resources, or the Ethics and Compliance Team within the Law Department to report other issues.

Our Fundamental Obligations

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 those 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 cover various topics, including bribery and corruption, economic and other sanctions, financial reporting, insider trading, importing and exporting, competition (antitrust), workplace health and safety, environmental protection, and many more. MSA also maintains specific policies for many of these laws, and some of the more commonly encountered laws are addressed in greater detail in the Code.

THE MSA WAY

Expectations Of All MSA Associates

- Uphold the highest standards of ethical conduct in every action you take on MSA's behalf.
- Know the rules, laws and policies that govern your work and comply with them.
- Speak up, seek guidance and ask questions when you are uncertain about the right course of action.
- Complete all Ethics and Compliance training assigned to you.
- Report issues or concerns when they arise through the resources described in this Code.

THE MSA WAY

Obligations for All Managers

In addition to the expectations that apply to all associates, MSA leaders and managers have additional responsibilities under our Code to:

- Lead by example.
- Create and maintain a work environment that encourages, reinforces, and supports ethical conduct and compliance with the Code, the law, and related Company policies.
- Ensure compliance with the Code, the law, and applicable policies within all areas of your responsibility.
- Be available and provide for a psychologically safe environment.
- Communicate suspected violations of the Code to the Ethics and Compliance Team within the Law Department.
- Regularly discuss ethics and compliance topics with your teams.
- Ensure that everyone on your team completes all required training.
- Never retaliate or permit retaliation against an associate who has raised a concern in good faith.

ALL MANAGERS ARE RESPONSIBLE FOR CREATING AND MAINTAINING A PSYCHOLOGICALLY SAFE WORK ENVIRONMENT THAT ENCOURAGES, REINFORCES, AND SUPPORTS ETHICAL CONDUCT AND COMPLIANCE WITH THE CODE AND THE LAW.

THE MSA WAY

A team of product developers is racing to finish a mobile app. They've gotten wind that a competitor is releasing a similar product, and faced with the new competitive threat, they're under pressure to push out a sleek update. But a day before launch, the app developers find a flaw that could cause customer information to be compromised. They decide to alert their manager but the manager says, "I don't have time to worry about 'what-ifs.' We need to get this launched, let's all get back to work."

What Should They Do?

In this scenario, the manager, like the developers, is under pressure to deliver a product. But the manager's response is unacceptable. Associates must feel safe to express important concerns without fear and with the knowledge that their concerns will be considered.

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 Ethics and Compliance Team within the Law Department, the Ethics Guideline, or any other resource described in the Code
- Implement the chosen course of action
- Check back to review the impact of the chosen course of action

Business Ethics Resources

Business Ethics Training

As part of our global business ethics program, the Company maintains an ongoing training program to ensure that associates understand their obligations and are educated on key ethics and compliance risks. As a baseline, associates receive annual Code training, and training topics vary year-to-year. Beyond that, targeted compliance training is deployed on a variety of specific topics, ensuring the right content is delivered to the associates who need to receive it. The Company's training programs include a blend of live and self-paced web-based training in addition to a variety of other resources.

MSA Connect Business Ethics Intranet Site

Our Business Ethics intranet site is our self-service portal providing on-demand access for business ethics program information, including the Code, policies, online training, third-party due diligence, guidance materials, speaking up resources and other tools. This site also includes our published quarterly newsletter *Integrity Matters*. In each newsletter, we provide associates with important information related to key business ethics topics, examples of how those topics may apply to MSA, and reminders about Company resources.

Our Workplace

We are committed to ensuring a workplace free from discrimination, harassment and bullying, and every associate is entitled to a workplace that promotes dignity and respect.

An Environment of Mutual Respect

We are committed to ensuring a workplace for associates that is free from harassment, discrimination and bullying. Every associate is entitled to 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 promptly and without exception.

THE MSA WAY

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

What Should I Do?

Report this behavior to your supervisor or manager, your Human Resources representative, the Ethics and Compliance Team within the Law Department or the MSA Ethics Guideline. Repeated, unwelcome advances are inappropriate and unacceptable and MSA will not tolerate any such behavior. 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, gender and gender identity or any other status protected by law.

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 can still violate the Code and the Company's *Global Harassment Free Environment and Anti-Bullying Policy. (*See the *Global Harassment Free Environment and Anti-Bullying Policy* for more information*).*

Fair Treatment and Diversity

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

THE MSA WAY

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

A Safe Workplace

At MSA, we pride ourselves on being The Safety Company. Our dedication to safety is a fundamental principle that guides us each day.

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. Regardless of the circumstances, you must report concerns about workplace violence to your manager or supervisor, Human Resources, the Company's Environmental Health and Safety Leadership Team, the Ethics and Compliance Team within the Law Department, or the Ethics Guideline. Imminent threats must be communicated to site security personnel or law enforcement authorities. (See the *Global Workplace Health and Safety Policy* for more information).

OUR DEDICATION TO SAFETY IS A FUNDAMENTAL PRINCIPLE THAT GUIDES US EACH DAY.

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
- Report all workplace injuries

Substance Abuse

Substance abuse threatens the well-being of our associates and the integrity of our products, and it is wholly contrary to our mission and will not be tolerated at MSA. All MSA associates are expected to perform their jobs free from any effects of alcohol or drugs.

MSA maintains policies across the world setting forth the requirements with regard to substance abuse in greater detail, 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 see your Human Resources People Experience Advisor or the *Global Drug and Alcohol Policy* for more information.

Our Workplace (cont.)

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 *Global Data Confidentiality and Classification Policy* for more information*)*.

Some examples of confidential information include:

- Research and product development plans
- Product designs
- Marketing strategies
- Unpublished financial results
- 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!

EVERY ASSOCIATE IS OBLIGATED TO MAINTAIN THE CONFIDENTIALITY OF THE COMPANY'S INFORMATION.

Intellectual Property

At MSA, we spend significant resources creating and protecting our intellectual property, sometimes called an "intangible asset," or IP, which may include ideas, inventions, processes, sales data, equipment designs, and things created on Company time. MSA's IP includes registered and unregistered patents, trademarks, copyrights, and many kinds of confidential information. IP can be found in many places, including in Teams Channels, SharePoint pages and other electronically stored information or collaboration tools. All associates and others subject to the Code must follow *MSA's Data Confidentiality and Classification Policy* to protect MSA's intellectual property. (See *MSA's IP Playbook* located on the Law Department's SharePoint Site for more information).

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. 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.

Use of Information Technology

Associates must be vigilant about the potential hazards of disclosing important information when using technology. We must use secure networks and Company approved devices to store information. MSA provides regular awareness trainings and simulated phishing campaigns to raise awareness to our associates and help our workforce keep up with the rapidly growing complexity of cybersecurity risk. *(*See the *Global Computer Network Usage Policy* for more information*).*

Our Business Partners

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. A conflict of interest exists when a person's business judgment is clouded or may appear to be clouded by a personal interest. For example, personal relationships or financial interests with business partners and other outsiders may cloud our judgment or ability to act in a manner that is best for MSA.

Always promptly disclose in advance any proposed activity that may create a conflict of interest or appearance of a conflict before proceeding. Associates must inform both their supervisor and the Ethics and Compliance Team within the Law Department of each potential conflict and seek direction before acting.

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.

A CONFLICT OF INTEREST EXISTS WHEN A PERSON'S BUSINESS JUDGMENT IS CLOUDED OR MAY APPEAR TO BE CLOUDED BY A PERSONAL INTEREST IN A TRANSACTION OR MATTER.

THE MSA WAY

Conflicts may arise from a number of areas. Common conflicts that should be disclosed and not be permitted include:

- MSA business transactions with family members
- Engaging in personal transactions with MSA business partners
- Holding a financial interest in an organization doing business with MSA
- Holding a financial interest in an organization that competes with MSA
- Serving as a director, officer, shareholder, owner, employee or consultant to an outside business entity, including a non-profit, that has the potential to compete with MSA

Concurrent Employment

MSA associates may wish to engage in work outside of our Company which we call "concurrent employment." This might include having a second job, receiving compensation for speeches or presentations, or being engaged as an expert. Any speech or presentation which contains information about MSA must be reviewed by the Law Department prior to use. If you are asked to be a subject matter expert related to MSA, please get approval before proceeding.

Concurrent employment arrangements can at times conflict with our responsibilities to MSA. All questions regarding concurrent employment should be directed to your local Human Resources People Experience Advisor or the Ethics and Compliance Team within the Law Department.

THE MSA WAY

I am considering making a small ownership investment in a 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 Ethics and Compliance Team within the Law Department or the MSA Ethics Guideline for review before proceeding.

Our Business Partners (cont.)

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), U.K. Bribery Act, and other similar laws 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 Ethics and Compliance Team within 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.

Because the FCPA and similar laws 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 *Global 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 Ethics and Compliance Team within the Law Department or the Ethics Guideline. *(*See the *Global MSA Anti-Bribery/Anti-Corruption Policy* for more information*)*.



The Company maintains a formal business partner due diligence process through which all third parties to be engaged by the Company in connection with the sale of our products or services must successfully complete. Each regional sales channel leader is responsible for ensuring compliance with the Company's due diligence procedures, with support from the Ethics and Compliance Team within the Law Department. Business partners are also required to be engaged under written agreements approved by the Law Department, including detailed anti-bribery compliance covenants.

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.

THE MSA WAY

The giving or receiving of gifts or hospitality is prohibited unless ALL the following conditions are met:

- 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 Ethics and Compliance Team within the Law Department in advance for guidance at integrity@msasafety.com

Our Shareholders

ASSOCIATES ARE OBLIGATED TO TAKE REASONABLE STEPS TO SAFEGUARD ASSETS, ENTRUSTED TO THEM, AND ASSOCIATES MAY NEVER USE COMPANY ASSETS OR INFORMATION TO BENEFIT AN INTEREST OTHER THAN THAT OF MSA.

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.

Accuracy of Books and Records

Stakeholders 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 included in the books and records of the Company, and all such records must accurately reflect the substance of underlying transactions or events. Expense reports, invoices, purchase orders and contracts are all considered supporting financial records and are subject to the same conditions.

For further information about our accounting policies and procedures, we encourage you to contact the Office of the Chief Accounting Officer. *(*See *MSA's Accounting Policy Manual* for more information*)*. If you suspect improper accounting practices, you must report it using the resources described in this 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 office of the Chief Accounting Officer, Chief Legal Officer, or the Ethics Guideline.

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 unauthorized disclosure (for example in the case of confidential information) of MSA assets is strictly prohibited.



We recently won a large order that requires us to gain customer approval of our engineering drawings before shipment. My manager instructed me to ensure that we ship and invoice before the end of the current quarter with or without the customer's approval so that we could record the sale for the Company.

What Should I Do?

Accounting rules must be followed as to when to recognize revenue for orders. It is not proper to recognize this sale without the approval first being obtained.

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 Global 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's Global 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 *Global Insider Trading Policy* for more information*)*.

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 if the engagement involves the global audit provider.

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 your manager and the Ethics and Compliance Team within the Law Department for prior approval.

THE MSA WAY

Today, I learned of the Company's preliminary annual financial results in advance of public announcements. Independent of receiving this information, I had been planning to sell MSA stock as part of my regular financial planning.

Is this Acceptable?

No. Unpublished financial results are an example of something that could be considered "insider information." Trading while in possession of insider information is strictly prohibited. In the above example, it does not matter that you were already planning to sell stock. The fact that you now possess insider information prohibits you from engaging in the sale. Always consult the Company's *Global Insider Trading Policy* for further information, or contact the office of the Chief Legal Officer when unsure.

Our Marketplaces and Communities

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 Ethics and Compliance Team within 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 Company may conduct business. A full list of economic sanctions and embargoes can be obtained through the Ethics and Compliance Team within 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. *(*See the *Global Import/Export Compliance Policy* and *U.S. Trade Sanctions Compliance Policy* for more information*)*.

THE MSA WAY

Can I create a new MSA Channel Partner/Distributor/End User Customer in SAP without prior approval and vetting by the Export Compliance Team?

Is this Acceptable?

No. These entities may be embargoed/sanctioned/denied parties who MSA cannot do business with under certain circumstances. Before acting, please contact the Manager of International Trade and Regulatory Compliance within the Law Department or the Export Customer Service Team.

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.

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 *Global 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 Law Department or the Ethics Guideline.

THE MSA WAY

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.

THE MSA WAY

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

MSA is dedicated to complying with environmental laws and conducting business in a way that conserves natural resources and promotes sustainable practices. This commitment extends to integrating environmental and sustainability considerations into business decisions, including responsible supply chain sourcing, lean manufacturing, and product stewardship.

MSA associates are expected to know and follow all applicable federal, state, provincial, and the local environmental laws and regulations and Company policies and procedures. In addition, site leaders and management hold the responsibility of adhering to regulations and overseeing their facilities to ensure compliance. It's essential to recognize that knowingly and willfully violating environmental laws can lead to personal civil and criminal penalties. Therefore, site leaders must possess comprehensive knowledge of these obligations and promptly report any deviations.

If you have questions or concerns regarding environmental compliance, please contact the Global Environmental Health and Safety Department or use another MSA resource. (See the *Global Environmental Policy* for more information).

WE ARE COMMITTED TO CONDUCTING OUR BUSINESS IN A MANNER THAT IS ENVIRONMENTALLY SUSTAINABLE.

Social Responsibility and Citizenship

Data Privacy and Security

MSA recognizes that it is important to protect personal data. We properly use some personal data to run business operations (e.g., contacting business partners, paying employees, fulfilling contracts). MSA is committed to processing all personal data in a secure manner and in accordance with applicable laws, including personal data coming from the European Union which is subject to defined obligations. MSA has special processes in place to ensure compliance. *(*See the *Global Data Protection Policy* for more information*).*

Use of Artificial Intelligence

MSA holds valuable information about us and the businesses of customers, suppliers, and others. We must manage this information in a safe, ethical, and secure manner. As artificial intelligence (AI), especially Generative AI, becomes more widely available, MSA associates must adhere to our *Global Generative AI Acceptable Use Policy* and follow compliance processes for creating, procuring, using, and deploying AI. For more information, contact MSA's Data Innovation & Insights Team or the Law Department. *(*See the *Global Generative AI Acceptable Use Policy* for more information*).*

Human Rights and Labor Laws

MSA places the highest value on the dignity, safety, and health of all associates and those of our business partners. This is the core of our Company mission. 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 applicable wage and labor laws. We do not do business with supply chain partners who engage in child labor, trafficking, or who avoid paying lawful wages. MSA maintains a *Global Human Rights Policy* which sets forth our standards and expectations in greater detail. (See the *Global Human Rights Policy and MSA's Modern Slavery Statement* for more information).

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 Global Public Relations and Strategic Communications, or MSA's Manager of Investor Relations.

Social Media

Used responsibly, social media platforms like Facebook, Instagram, LinkedIn, YouTube, and X provide MSA with varying ways to reach stakeholders. MSA associates are encouraged to use social media in ways that reflect positively upon themselves and the Company. Use of social media for Company purposes must be truthful, respectful, professional, and in accordance with the Company's core values, the Code, Company policies, and the Company's *Global Social Media Policy.* MSA associates must be aware that everything said or done on social media should be in the best interest of MSA. Contact the Director of Global Public Relations and Strategic Communications with questions about the proper use of social media for Company purposes. *(*See the *Global Social Media Policy* 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.

A Message from our Vice President, Secretary and Chief Legal Officer

Thank you for your commitment to MSA's foundational value of Integrity. For over 110 years, MSA has done business "the right way," and our ethical principles are a large reason for our continued success and for the reputation we have worked to earn in our markets and communities.

To formalize our commitment to integrity, MSA maintains a global Business Ethics Program, which is anchored by the MSA Global Code of Business Conduct (the "Code"). The Code includes the Company's core expectations for business ethics and compliance with the law. In addition to the Code, the Company also maintains various policies that expand on our obligations outlined in the Code. We are all expected to comply fully with the Code, Company policies and applicable laws, without exception, in all of our business dealings.

To assist us in fulfilling our obligations under the Code, the Company maintains a variety of resources, including the Ethics and Compliance Team in our Law Department, an in-house team of legal professionals, a global organization of trained Human Resources professionals, ongoing training and awareness programs, and of course, our Ethics Guideline reporting tool. We provide these resources so that you'll always have a path to seek guidance before acting. Please refer to the pages of the Code for more information on each of these resources.

While our Code and Business Ethics Program may lay the groundwork for enabling us to do the right thing, our success to act ethically rests with all of us. To that end, I thank you for all that you do to preserve our foundational value of Integrity.

Rick Roda
Vice President, Secretary and Chief Legal Officer
Chief Compliance Officer



MSA Ethics Guideline Telephone Numbers

Argentina | Spanish/English
Dial 0800-345-2056.

Australia| English
Dial 1800015896.

Austria | German/English
Dial 0800 250035.

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

Brazil | Portuguese/English
Dial 0212 018 7680

Canada | English
Dial 1-800-205-5119.

Chile | Spanish/English
Dial 800914735.

China | Mandarin/English
Dial 4001201879.

Colombia | Spanish
Dial 01 800 5190447.

France | French
Dial 0801 13 00 11.

Germany | German/English
Dial 0800-1813951.

India | Bengali/English
Dial 00080005 03874.

Indonesia | English
Dial 021 30942336.

Ireland | English
Dial 1800456795.

Italy | Italian/English
Dial 800932405.

Japan | Online or mobile reporting only.

Kazakhstan | Online or mobile reporting only.

Malaysia | English
Dial 1800-81-1055.

Mexico | Spanish/English
Dial 8008800911.

Morocco | Arabic
Dial OneConnect – 0530-456050.

Netherlands | English
Dial 0800 0224854.

Peru | Spanish/English
Dial 0800 74719.

Poland | Polish/English
Dial OneConnect 800 005 234.

Saudi Arabia | Online or mobile reporting only.

Singapore | English
Dial 8004922511.

South Africa | English
Dial 080 001 0357.

Spain | Spanish/English
Dial 900752136.

Sweden | English
Dial 020 12 77 41.

Switzerland | German/English
Dial 0800 800 185.

Thailand | Thai
Dial 1800018273.

United Arab Emirates | English
Dial 8000120187.

United Kingdom & Northern Ireland| English
Dial 0800 066 8365.

United States | English/Spanish
Dial 800-205-5119.

International Locations: From an outside line, dial the OneConnect number for your location.

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

The Safety Company

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www.msasafety.com/ethicsguideline

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