

Mitotec Precision Code of Ethics

The following Code of Ethics has been developed to ensure our local and global responsibility which has been developed from past Company guidelines.

Compliance with the following self-imposed ethics and regulations are also expected as a minimum standard from our business partners & suppliers.

1. Purpose & Scope of Code of Ethics

This Code of Ethics contains the guiding principles of conduct which apply to all Mitotec Precision (further referred to as “Company”) employees. The term “employee” shall apply to all current Company employees and also includes members of management. The purpose of this Code of Ethics is to make clear to the employees the fundamental legal and ethical requirements with which they must comply while working for the Company.

2. General Principles

All employees are obligated to comply with the statutory regulations that apply to us. The same applies to any in-house instructions and guidelines. Employees of the Company will avoid any participation in transactions which are recognizably aimed at circumventing statutory provisions. Every employee has an obligation to safeguard the reputation of the Company and to avoid doing anything that might harm the Company. In particular, we expect our employees to display personal integrity and reliability.

3. Human Rights

The Company will comply with all internationally promulgated human rights and assist in ensuring such within our sphere of influence. We also categorically reject any kind of child labor or forced labor. We expect our business partners to also abide by these principles.

4. Conflict Minerals/Metals

The company supports authorities, non-government organizations and industrial associations in their efforts to stop the trade of so-called Conflict Minerals/Metals (Section 1502 Dodd-Frank Wall Street Reform and Consumer Protection Act). It is the Company’s goal to ensure through careful monitoring and auditing of the supply chain that no so-called Conflict Minerals/Metals are procured or utilized in production.

5. Ban against Discrimination

We expect all Company employees to respect the personal dignity, privacy and moral rights of each individual and to allow respectful cooperation as partners. We do not tolerate any discrimination based on race, color, nationality, ethnic origin, gender, sexual identity, religious belief, political persuasion, age, appearance or physical constitution. We prohibit any kind of sexual or other personal harassment or insults and bullying. We shall use all means at our legal disposal to stop any kind of coercion or force or threat of force.

6. Conflicts of Interest

Employees of the Company must avoid situations which might result in personal conflicts of interest or conflicts of interest with our business partners. Every employee must immediately notify their direct manager of any business relationships of a private nature with companies which are directly associated with the Company.

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7. Confidentiality/Data Protection

Company employees are bound to maintain complete confidentiality regarding all internal confidential matters of the Company and regarding all confidential information belonging to or concerning our business partners or customers. Confidential information must be protected from unauthorized viewing by third parties. Company employees are in particular obligated to comply with the provisions of data protection regulations and to actively ensure that personal & Company data is reliably secured against unauthorized access. The Company is also bound in particular with regard to the property of third parties. All employees will not provide information that has been unfairly acquired and we clearly advocate a policy of absolute confidentiality.

8. Competition (Fair Trade)

The company is committed to the principle of pursuing its corporate goals using absolute legal and ethical means. Each employee is also under obligation to comply with the rules of Fair Trade. Any such breach of Fair Trade, such as agreements with competitors on price and terms, are not permitted.

9. Combating Corruption

The goal of the Company is to compete fairly and to foster business opportunity with the quality and value of our products and we absolutely object to bribery and unfair competition. No employee may use his or her job and business connections at the Company for his or her own benefit or for the benefit of a third party or to the detriment of the Company. No employee shall offer or accept private benefits such as money, items or services which will or are intended to or might be likely to influence normal business decisions. Every Company employee is obligated to advise and assist management when there is suspicion of the existence of corruption or embezzlement. Assistance will also be offered by management and Company ownership.

10. Dealings with Business Partners and Suppliers

The company is committed to the principle of fair and open relationships with our business partners and suppliers. The Company will make every effort to cooperate in the best possible manner with our customers, so that they can make a reasonable decision that is in accordance with their interests. Potential conflicts with interests of customers and other business partners must be recognized in good time, avoided as far as possible or where this is not possible resolved appropriately.

11. Integrity of Information and/or Communication

All records and reports must be correct, complete and truthful, regardless of whether they are used for in-house communications or external communications. This applies in particular to the Company financial statements as well as the other documents regarding the growth and the financial position of the Company. Official statements to the media and communication with the media shall be made only by management or employees expressly authorized to do so.

12. Environment

The Company declares its responsibility for protection of the environment and natural resource sustainability. All employees have an obligation when taking action or making decisions to consider the impact on the environment and to avoid waste or contamination of the environment as much as reasonably possible.

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13. Protection of Company Assets

Company assets include not only tangible items/property but also intangible assets (intellectual property including software products), information, and the ideas and knowledge of employees. All employees are responsible for protecting these Company assets. The Company assets may only be used for permitted business purposes and under no circumstances for illegal purposes.

14. Company Donations and/or Sponsorship

In the case of donations and sponsorship by Company, we will take care to ensure compliance with the regulations of the relevant jurisdiction and the provisions applying internally in this regard. Donations may be made to institutions for the purpose of promoting education and science, art and culture and for social purposes or other purposes considered worthy of support. No donations are made to political parties.

15. Implementation of Code of Ethics

This Code of Ethics is a living part of our culture and hence a part of the daily working life of all employees at the Company. Every employee is therefore responsible for compliance with the rules and principles stipulated in this Code of Ethics. Company management shall ensure that all are familiar with this Code of Ethics and observe the rules and principles that apply to them; they shall through their own conduct serve as examples. Company employees should contact their direct supervisor if they have any doubt as to the application of these guidelines. The ownership of the company also feels particularly bound by this Code of Ethics and will use all means to enforce these guidelines or to have them enforced.