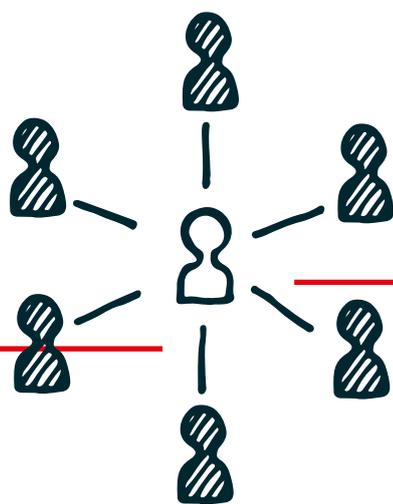




## **MIPA SE Code of Conduct**





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# MIPA SE code of conduct

## Our code of conduct

Corresponding to the guiding theme “Professional Coating Systems”, Mipa develops, produces and sells coatings with a focus on varnish and paints for professional users.

Today, the company can look back on over 100 years of history in producing paints and varnishes thanks to the tradition of the founding family since 1900. The consistently high quality of the products is highly valued by numerous customers worldwide. Even at the highest level, the continual improvement of products and processes is our goal.

We see ourselves as a company active worldwide with partnership contacts and a mutual knowledge exchange. We are the paint partner for our customers and our customers are our partners for the permanent improvement of our products and processes.

The basis of responsible and sustainable company action is the observation of social, economic and ecological principles. We emphasise the importance of conserving the environment and natural resources during development, production and marketing, well beyond the legal requirements.

Our success is based on the ambitious work of all colleagues who ensure innovations and sustained customer service, and who are committed to consistent quality, and not least to compliance with ethical principles.

Our strength is the trust that our customers, business partners, employees, suppliers and the public place in us. This trust is both an honour and an obligation. The consequent adherence to the values of trustworthiness and reliability, to moral standards and to the principle of legality and legitimacy is of central importance to us.

The concentration on these values binds the employees of the Mipa Group beyond all country borders. We set up this code of conduct to highlight the importance of this common commitment. It makes clear our attitude to legal regulations and ethical issues, and also highlights the expectation we set for ourselves and for our business partners, employees and suppliers.

The code of conduct is binding for each and every Mipa employee. We want Mipa employees globally to feel obligated to carry out ethical business practices, fair behaviour, conserving the environment and the unlimited compliance to legislation. This is and will remain a precondition for our future international success.

Violations against legal requirements and thus against this code of conduct shall not be tolerated under any circumstances.

Markus Fritzsche  
Chairperson of the Board

Klaus Fritzsche  
Board Member

Dr. Uwe Rohr  
Board Member

Robert Jungwirth  
Board Member



# Principles

## Complying with laws

Compliance with all legal requirements is self-evident for us and is our top priority. For this reason, we also expect all Mipa employees, our business partners, customers and suppliers to comply with the applicable legislation on a regional, national and international level, without limitation.

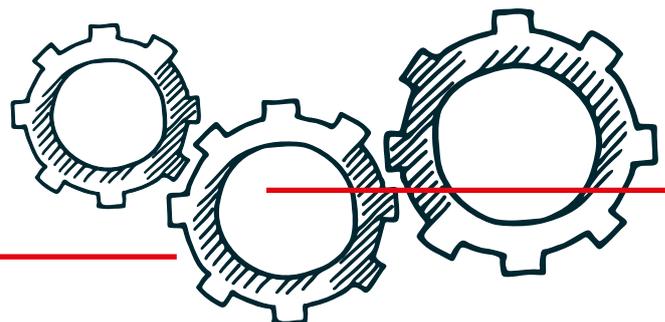
Violations against this principle shall not be tolerated, regardless of the reason.

## Responsibility

We see respect for social, economic and ecological principles as the basis of responsible and sustainable company action. Responsibility to environmental, societal and human rights principles is crucial for us.

## Reliability and conduct

Our conduct is based on the principles of integrity, fairness and honesty. Based on these values, we take into account the interests of customers, business partners, employees, suppliers and the public.



# Handling data

## Data protection

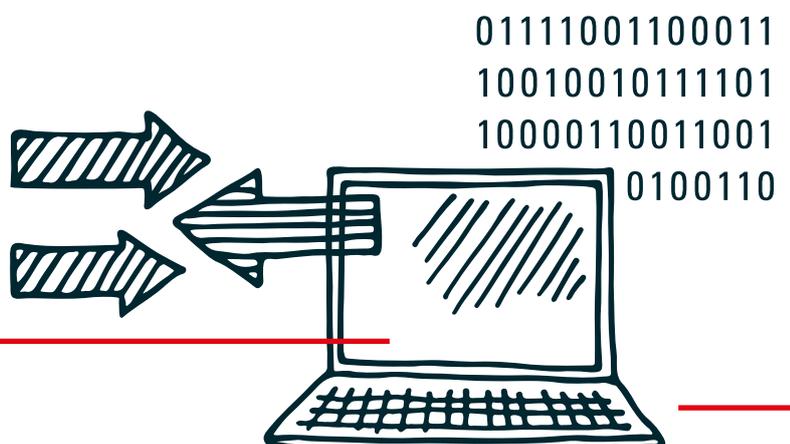
The processing of personal data always takes place in harmony with the General Data Protection Regulation and in compliance with the applicable country-specific data protection provisions. By way of our privacy policy, we would like to inform the public about the type, scope and purpose of the personal data collected, used and processed by us. We place great value on the confidentiality of this data. This is why we also expect the responsible and confidential handling of sensitive data from our customers, business partners, employees and suppliers.

## Data security & secrecy

Mipa has implemented numerous technical and organisational measures to ensure flawless protection of the data being processed. We place great importance on the security of personal and business data. We also expect the safe handling of data from our customers, business partners, employees and suppliers.

## Business information & intellectual property

We act in a responsible manner when it comes to handling business information. This kind of information may not be used to the advantage of individuals or third parties. This also applies after the termination of employment or business relationship. Commodities worth protecting also include inventions, brands, logos, drafts, production processes, technologies, details of business relationships with customers and suppliers as well as other information about business models. Our principle includes the responsible use of in-house resources. These are used exclusively for business purposes.



# Social standards, safety & equal opportunities

## Health and safety

We ensure a healthy and safe working environment. The strict adherence to the respective applicable safety regulations is an essential requirement. We also expect this awareness from our customers, business partners, employees and suppliers.

## Working hours and remuneration

We place value on appropriate remuneration and adhere to the legal provisions about the minimum wage, as well as the other labour law provisions. Legal requirements about the maximum working hours as well as break times and rest time must also be complied with. Child labour, as well as any kind of exploitation of vulnerable groups shall not be tolerated. Mipa accepts social responsibility and also expects this from our customers, business partners, employees and suppliers.

## Equal opportunities

Respect of personality rights and privacy is self-evident. Our company culture is based on trust, equal opportunities and tolerance. We reject any form of victimisation, harassment, intimidation and bullying. Any form of discrimination is forbidden. All employees help to promote a positive image through their exemplary, professional conduct. The equal opportunities experienced by us are also expected from our customers, business partners, employees and suppliers.



# Quality, production safety & raw material acquisition

## Quality

Quality is the top priority for Mipa. This is documented in the management system according to ISO 9001. We do not just orient ourselves on our own standards, but also on the expectations of our customers and business partners. This exchange helps us to further develop our quality standards. The fulfilment of and compliance with the strict quality standards is an obligation for all Mipa employees.

## Product safety

We adhere to the laws, regulations and provisions regarding prohibitions or restrictions of specific substances. We label our products according to the provisions and inform all interested parties about all relevant topics regarding product safety in the form of product information and safety data sheets. These are always kept up to date and made available without restriction.

## Raw material acquisition

Mipa manufactures products of the highest quality. This requires raw and primary materials of perfect quality. Within the framework of the principles in this code of conduct, we expect compliance with social and environmental standards in the respective countries of origin. The raw materials used also must not contribute directly or indirectly to violations of human rights in the countries of origin. We also expect our suppliers to share this point of view.



# Responsibility to the environment

## Environmental protection

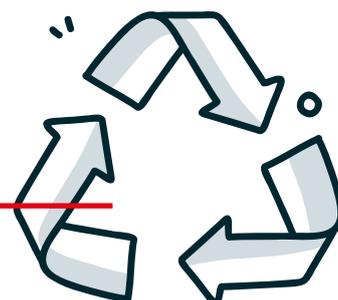
We have set ourselves the goal of continually improving the environmental friendliness of our business activity and to use all the resources we need in a sparing and responsible manner. We have documented this in the management system according to ISO 14001. It is self-evident that we comply with the national and international legal provisions and standards on environmental protection. This environmental awareness is also a requirement we have of our customers, business partners, employees and suppliers.

## Sustainability

We expect the resources energy, water and raw materials to be handled sparingly and efficiently. Mipa recognises climate protection as a sustainability goal. The use of renewable raw materials and the development of environmentally-friendly processing and handling methods is permanently supported by Mipa.

## Waste management

We ensure that waste and waste water from the operating processes, production processes and operating plants are monitored, and typed and checked before disposal, and then fed into the suitable disposal system. For substances or mixtures which present a danger to the environment if they are released, we ensure that the handling, conveyance, storage, use, treatment, recycling and disposal are carried out in a safe manner. We also expect responsible disposal actions from our customers, business partners, employees and suppliers.



# Fair cooperation

## Solidarity

We act carefully and in a transparent and sustainable manner to guarantee fair competition according to our principles, as well as national and international law. This also applies to guidelines of other cultural societies and countries in which we, our customers, business partners, employees and suppliers are active. We also expect this conduct from others as a basis for long-term, trusting cooperation.

## Collaboration

As well as complying with legal provisions, we see the basis of a trusting business relationship and collaboration in the respectful and appropriate treatment of individual participants. We shall behave in a respectful and unprejudiced manner towards all discussion partners. We also expect this conduct from our customers, business partners, employees and suppliers.

## Corruption and bribery

We reject any form of corruption and bribery.

We shall not demand benefits from business partners or third parties under any circumstances, or accept the promise of receiving something in return. We also expect conduct corresponding to fair and good morals from our customers, business partners, employees and suppliers.



# Implementing the code of conduct

## Implementation

All Mipa employees worldwide are obligated to comply with this code of conduct. Regardless of their position, all Mipa employees are personally responsible for their own compliance with the code of conduct. Managers are responsible for setting up suitable guidelines as well as monitoring compliance with these. Violations must be brought to the attention of company

management and penalised. This code of conduct is binding for MIPA SE, the Mipa Group and their employees. As a basis for long-term and trusting collaboration, we also expect compliance with this code of conduct from our business partners.





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