



CODE OF CONDUCT

- November 2020 -

Table of Contents

Preface	3
1. Definitions.....	4
2. Business Conduct.....	4
Full compliance with the law.....	4
Conflicts of interest.....	4
Fair competition	5
Prevention of money laundering	5
Supplier relations.....	5
3. Quality Policy.....	5
Zero defect	5
International standards.....	6
Time management.....	6
Cost reduction.....	6
Customer support	6
Training policy.....	6
Audits.....	7
4. Conduct of Employees	7
Equal treatment and non-discrimination	7
Human and labor rights	7
Health and safety.....	7
Sustainability and climate protection	8
5. Privacy Policy and Data Protection.....	8
Confidential information.....	8
Data protection	8
Company property.....	9

Preface

Dear colleagues,

Since its establishment as Europe's regional subsidiary of MISUMI Group Inc. in 2003, MISUMI Europa GmbH has earned a European reputation as a reliable and equitable partner within various fields of commerce, such as Factory Automation, Press Die and Plastic Mold manufacturing industries. This reputation combined with innovative top quality, one-stop-shop and reliable quick deliveries have made MISUMI Europa GmbH, a respected and leading European player within the MTO market of configurable and standardized mechanical components, indirect production materials.

We intend to maintain and further expand this position in the future, and to fulfil this obligation, Code of Conduct of MISUMI Europa GmbH is enacted to be our ethical and legal compass and guideline.

It contains the basic rules for our employees regarding how to conduct matters at MISUMI Europa GmbH, as well as it projects our ethical and corporate philosophy towards our business partners and to the public.

This Code of Conduct supplements and specifies our corporate principles in a responsible, team-oriented and entrepreneurial manner. In this regard, the Executive Board expects from every employee of MISUMI Europa GmbH to strictly observe and apply these rules. In this way, we want to maintain and expand the reputation of our leading position in the global manufacturing industry among professionals and public at large.

Frankfurt am Main, 16.11.2020


Koichi Tsunematsu
Managing Director and President
MISUMI Europe Business Company


Stephan Stammberger
Managing Director

1. Definitions

This Code of Conduct (the "Code") shall be defined as a set of fundamental policies and rules that is a model of the processes, activities and conduct of the directors, executives, officers and employees of MISUMI Europa GmbH and its subsidiaries (the "Company") from the standpoint of compliance with the relevant laws, regulations, and the Company's policies, rules and corporate ethics standards.

The Code aims at describing our values and work ethics to our employees to ensure the success of our ongoing and long-term business strategies. In addition, we also target at fulfilling and enhancing our development goals and minimizing the corporate business risks by way of safeguarding the proper conduct of our business according to the outlined principles of this Code, which have been enacted according to our commitment of full compliance with all current legal requirements and internationally accepted business ethics standards. Therefore, we expect from all our employees to be in conformity with our core values by way of complying with this Code.

2. Business Conduct

Full compliance with the law

It is a fundamental principle for us to fully comply with all applicable laws, rules and regulations to fulfill our goal of responsible business conduct. In this sense we perpetually observe and adhere to the legal necessities and adjust our business accordingly, regardless of the advantages and disadvantages to be encountered.

Conflicts of interest

Conflicts of interest arise due to the conduct of employees for their own account and personal gain, at the expense of the Company's interests. Our business decisions are made exclusively for the best possible interest of our Company, which sometimes requires keeping our professional and private lives separate. Therefore, all personal activities that may potentially cause risking the interests of the Company shall be strictly avoided by the employees. At any occurrence of conflicts, transparent and open solution processes are pursued by the Company.

Fair competition

Sustainable market development requires ensuring of fair competition for all the market players. Therefore, we strictly adhere to all the competition regulations and the programs on anti-trust compliance. In this sense we place great emphasis on practicing fair terms with our business partners, suppliers and competitors. We do not tolerate any actions contrary to our commitments that are aimed at preventing cartels and corruptions. Accordingly, we strictly prohibit our employees to get involved with bribery, backhanders, giveaways and occasional gifts from third parties.

Prevention of money laundering

Our company has been adhering closely to the legal requirements of preventing money laundering. In the case of doubt, all employees may be requested to inform the Company about unusual financial transactions to the responsible department for reviewing and auditing the transactions.

Supplier relations

We take our compliance with the legal and ethical standards very seriously. In order to enable us to fulfill our compliance goals within every level of our business strategy, we expect from all our suppliers to also adhere to stipulations within this Code.

3. Quality Policy

Zero defect

Satisfactoriness of our products is a key value to establish and ensure the reputation of our Company. For our entire product portfolio, we ensure and continuously enhance our quality standards in order to reach high level of efficiency in perfect quality. Accordingly, we pursue a program of defect prevention, instead of defect detection, in order to fulfill our zero defect policy.

International standards

We follow all applicable product safety and sustainability standards to ensure the quality and efficiency of our products. In this sense, we control and certify our products according to the requirements of several internationally recognized certification systems, such as DIN EN ISO 9001:2015, ISO 14001:2015, AEO, and CE, as well as locally binding regulations, such as RoHS Directive (EU Directive 2011/65/EU) and REACH Regulation (Regulation (EC) no. 1907/2006) of the European Union.

Time management

We see our speed as a competitive advantage for our customers. Therefore, we deliver our products just in time when customers want them. Our logistics processes have been optimized according to the smooth flow of our deliveries and we regularly control our delivery chain all around the world to advance the Company even further.

Cost reduction

Efficiency is not solely the result of a successful time management system, but it also depends on providing the most optimal prices. Therefore, we are constantly working on lowering unit costs and early adoption of optimized calculation methods for our products.

Customer support

We value the satisfaction of our customers very much. Therefore, we think about what their needs are before they themselves even realize them. Supplementary services relating to the products are provided before and after the delivery. Moreover, we support our business partners within the development and marketing of their innovative and market-oriented products to reduce the "time to market" range and provide efficiency within the distribution platform.

Training policy

Qualified employees are an essential resource of MISUMI. In order to ensure the quality of our products, we also provide training programs for our employees with relevant skills, meanwhile ensuring and enhancing their performance and effectiveness.



Audits

We conduct systematic audits to monitor our quality standards according to the new technical and legal requirements to ensure our compliance with internal and external quality requirements.

4. Conduct of Employees

Equal treatment and non-discrimination

MISUMI Group is an international company with subsidiaries worldwide. Being an internationally active company has led to our company culture of equal treatment and equal opportunities; regardless of race, nationality, age, gender, gender identity, religion, marital status, skin color, disability, sexual orientation, political views or any other grounds. In this regard, we behave towards our current and candidate employees in a non-discriminative manner within our policies of recruitment, promotion, benefits or developmental programs.

Human and labor rights

We respect and act in accordance with internationally recognized human rights. Therefore, we reject all forms of forced and child labor and we have taken all the measures to prevent such working conditions at our Company. We comply with the national work time regulations and we pay corresponding appropriate compensation for all employees in accordance with national and legal standards, the economic standards of different industries and regions, as well as the personal skills and development of each employee. In addition, we recognize employee unions, their representative bodies and the democratic right of employees to participate in such organizations. Participating or not participating in such organizations does not constitute any discriminative factor in payment or any form of differential treatment for our employees.

Health and safety

Health and safety of our employees is a fundamental value for our corporate objectives. Accordingly, we have taken all necessary measures to prevent occupational accidents and we expect all our employees to comply with our health and safety

regulations. In addition, we expect all our business partners to provide the same level of health and safety standards, meanwhile bearing their standard in mind within the selection process of our business partners and our subcontractors.

Sustainability and climate protection

Sustainability and climate protection are key values of resource efficiency of our environment. Therefore, we put great emphasis on developing our ongoing and future product plans according to the necessities of environmental protection and clean recycling of waste to keep the climate impacts of our production to a minimum. Accordingly, we have formulated our Green Procurement Guidelines and have set our objective as avoiding waste and plastic usage by reusing the packaging. We endeavor and support all our employees to actively cooperate with us to implement and achieve our sustainability and green procurement goals.

5. Privacy Policy and Data Protection

Confidential information

We have acknowledged that enabling our business goals to succeed and ensuring the reputation of our Company relies to a large extent on the data safety measures. We have accordingly taken all necessary steps and implemented the corresponding measures to ensure that the confidential business information of our Company, as well as the sensitive information that we receive from our business partners, are protected from the access of unauthorized colleagues and any other third parties.

Data protection

We are aware of the value of privacy and therefore we ensure the secrecy of personal information of our employees, customers, business partners and suppliers. In this sense, we have taken the necessary steps to comply with the GDPR and all other legal requirements of data protection. Collection, processing, usage and transfer of personal data are handled only when permitted by law or by the consent of the person concerned. Unauthorized access to personal data is strictly forbidden and we impose all the measures to adhere the relevant standards.

Company property

Properties, assets and resources of our Company are only used for company business and according to our company policies. Private use of company properties by employees, without any explicit permission, is strictly prohibited.