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MITEX CODE OF CONDUCT

The ethical values of our organization listed hereunder shall also be translated into active language establishing standards or rules describing the behavior any person should and should not engage in. The hereafter stated are principles for general conduct of MITEX and all its employees.

Fairness and respect

MITEX does not assume its interest to be of higher worth than the interest of individual employees, customers, partners and societies. Fairness is concerned with actions, processes, and consequences that are morally right, honorable and equitable. The virtue of fairness establishes moral standards for decisions that affect others. Fair decisions are made in an appropriate manner based on appropriate criteria.

The actions and decisions of MITEX are based on the following questions:

- Is it the truth?
- Is it fair to all concerned?
- Will it build goodwill and better partnership?
- Who will be influenced by the decision and will it be beneficial to them?

Health and safety

Any MITEX employee has the right to work in a save and healthy workspace. It is the responsibility of all MITEX employees to comply with established safety standards or to intervene wherever noncompliance occurs to avoid accidents. Furthermore, every employee is encouraged to point out ways for additional safety improvements or areas that to them require additional safety measures. The safety of all employees and third party personal on MITEX premises has the highest priority in all conduct.

Sustainability

MITEX commits to reduce its ecological footprint as much as technically and economically possible. As a producer and processer of elastomers as well as a company manufacturing products composed out of for example metal, steel and composites we are aware of the inherent energy consumptions but limit it to the economically and technically minimum level. We investigate and realize possibilities for energy saving, to reduce waste generation and increase recycling. Reduced internal errors, optimized processes and most importantly increased efficiency of MITEX customers are examples for economic and environmental requirements aligned in harmony which we seek.

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Community

MITEX acknowledges its responsibility to contribute positively towards the community, society and nation of each of its operations. MITEX condemns behavior that is not beneficial to common welfare and considers the impact of its actions. Economic success that is in line with the principles of this conduct and that provides safe, healthy and meaningful employment contributes to the respective community of MITEX operations in forms of tax payments, non-profit engagement and support as well as labor opportunities.

Company assets and information protection

It is the responsibility of all MITEX employees to ensure that company assets are used only for MITEX business purposes. Company assets are for example money, product, intellectual property, tools and machinery, all equipment and electronics including laptops, cellphones, and telephones as well as employees work time and product. Any deviation from this general rule requires acknowledgement from general management.

MITEX has to ensure that personal data as well as sensitive information is protected. All employees follow the data security guidelines, are trained regularly in this regard and act carefully to avoid third party misconduct. All MITEX actions are to be in accordance to the General Data Protection Regulation of the European Union. No digital or printed records of MITEX business data is to be transferred on private devices or into the private realm and vice versa.

Especially intellectual property, business secrets as well as information covered by nondisclosure-agreements is to be treated with even further sensitivity and care. No MITEX employee discloses any such information without approval of general management unless to do so is legitimate, in the best interest of the company and in accordance to law. In doubt, general management is to be consulted. Any information of partners, suppliers and customers is to be treated as save as MITEX own.

Law compliance

MITEX has a zero-tolerance policy towards corruption and bribery in any form. Any such actions will lead to immediate and serious consequences without exception. Any received gift, entertainment or covered expanses need to be in reasonable extend and quantity and may not affect any business activity or decision. Any regular or substantial gift, entertainment or covered expanse needs to be brought to the general management's attention and requires its approval.

MITEX employees safeguard the ability to make independent professional judgments by scrupulously avoiding undue influences and conflicts of interest. If in doubt if one's actions

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could lead to a conflict-of-interest, employees need to consult human resources or general management.

Employment practices

MITEX operates a manufacturing business and highly values the skills, loyalty and trust of all employees which allow to produce innovative high-quality products and services. MITEX employees are to be treated with the same fairness, respect and honesty that is requested of them.

All MITEX employees are fair persons who commit to justice, the equal treatment of individuals, tolerance and to acceptance of diversity. We are open-minded, willing to admit when in the wrong and, where appropriate, change our positions and beliefs.

Ethical executives demonstrate respect for the human dignity, autonomy, privacy, rights, and the interests of all those who have a stake in their decisions; they are courteous and treat all people with equal respect and dignity regardless of sex, race, ethnic background, age, disabilities, gender, sexual orientation, appearance, religious beliefs, political opinion or union membership.

All MITEX employees have the right of association and will be treated equally and fair regardless of their wish to do so.

Any personal political activity is to be considered a private opinion and shall not be associated to the work environment. No employee will suffer injustice because of her or his political views. Meanwhile, it is the responsibility of any employee to clearly distinguish personal opinion from any association with MITEX and to ensure the company does not seem to be represented by private opinions.

Any outside employment of MITEX employees outside the business cannot be in contradiction to the interests of MITEX. Outside employment with companies that are direct or indirect competitors, suppliers or customers of MITEX requires the approval of general management. Other outside employment may not affect the employment at MITEX negatively and is in doubt to be agreed upon with general management.

MITEX ensures that all working conditions are in accordance to the law of the countries and communities of its operations.

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Product quality, sales and marketing

MITEX products and services are known for highest precision and overall quality. We strive to outperform existing elastomer roller covers with superior technology, manufacturing practice and customer service.

Shipped products that are in contrast to this expectation damage the good name of MITEX and are against its manufacturing standards. Any sales and marketing activity needs to properly represent this high-quality expectation. We commit to accurately and truthfully market our products and services.

Company records and taxation

MITEX is committed to accurately represent its business activities in all its financial records, books and accounts and ensures these are a true, accurate and honest reflection of such. Our financial statements and overall conduct are in strict compliance with applicable tax and business laws, other regulations and internal controls. Any misconduct is to be brought to immediate attention of the general management.

Purchasing

MITEX purchasing is based solely on the total cost of product or service (TCPS). TCPS is defined as the total amount spent on the commitment including but not limited to the initial price, the lifespan cost of the purchase or service, the effect on MITEX business operations as well as the purchased quality, the effect on the environment including generated waste, recyclability, origin of the product, general conduct of the supplier, additional fees, costs and taxes.

The purchase of products or services of suppliers who repeatedly act in strict contrast to our code of conduct and our business principles is not permitted.

Fair termination of employment

MITEX employees are loyal to the company and their colleagues and if they decide to accept other employment, they provide reasonable notice, respect the proprietary information of their former employer, and refuse to engage in any activities that take undue advantage of their previous positions. No gained disclosed information may be shared with third parties especially after terminating the employment with MITEX.

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Misconduct and violation

All MITEX employees must comply with the rules set in this document. Non-compliance or violation must lead to disciplinary measures appropriate to the violation including termination of the employment.

Breaches and misconduct can anonymously be reported to governance@mitex.de. In addition, the general management invites all Stakeholders to report any such event to them. The general management is bound to take the appropriate measures to investigate all misconducts that have been brought to their attention via either channel.

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