

Code of Conduct of Mipri GmbH

Preamble

For our success and the reputation of Mipri GmbH, trust in our lawful and responsible behaviour towards our business partners and customers, authorities and the public is of utmost importance. The behaviour of each individual is crucial in this respect. A high level of social and ethical competence is expected of managers in particular - they have a role model function.

Since this behaviour is self-evident, this Code of Conduct does not contain any significant new regulations: However, it illustrates the legal and ethical requirements for the behaviour of every employee and provides principles of conduct that each of us should take into account in our daily work. The Code applies to all employees of Mipri GmbH.

1. Principles

Responsibility towards people and nature, fairness and tolerance are among the basic values of our company. This includes that every employee, in his or her daily work, must

- behaves lawfully and ethically,
- behaves loyally towards his company,
- acts professionally, fairly and reliably in all business dealings,
- deals fairly, politely and respectfully with colleagues, customers and business partners,
- appropriately considers the interests of customers and business partners, authorities, the public and the environment,
- respects and observes other cultures and cultural frameworks,
- refrains from any inappropriate form of discrimination,
- deals with risks responsibly and transparently.

We expect every employee to seek advice and help from a supervisor or colleagues if they have doubts about their own conduct or if they have indications of legally dubious processes in their work environment. Openness and trust are the most effective means of averting or limiting damage to the company from misconduct.

2. Fair competition - no prohibited cartel agreements

The purpose of antitrust law is to ensure free and fair competition, because it is the basis for efficiency, innovation and economic development. Violations of antitrust prohibitions are often punished with high fines, in some cases also with imprisonment. When conduct is prohibited under antitrust law requires precise examination in individual cases. In general, however, the following types of conduct are prohibited:

- Agreements between competitors on prices or the division of territories, customers or customer groups or production quantities,
- the price fixing of distribution partners,
- the abuse of a dominant position.

Even the appearance of a prohibited cartel agreement must be avoided. In discussions with competitors, no confidential information about prices and upcoming price changes or customer and supplier relations may be exchanged. Other facts, such as exclusivity agreements or the agreement of non-competition clauses, may also be relevant under cartel law. In cases of doubt, one should contact legal counsel provided by Mipri to have the antitrust relevance and permissibility of a measure examined.

3. Safety and environmental protection

The avoidance and safe control of hazards to people and nature is an essential part of responsible action. This applies to all areas of Mipri GmbH, but especially to the production and storage of our products, product development and product monitoring. Even if the production is carried out in contract manufacturing.

Compliance with all safety regulations is indispensable, regardless of whether they are prescribed by law, issued by the competent authorities or otherwise regulated. Even if one believes that one can safely control a potential hazard or perceives safety regulations as a nuisance, this must not lead to a slackening of care. In one's own interest, but also in the interest of one's colleagues and the company as a whole, safety regulations must always be applied consistently. Every employee shares

responsibility for safety in his or her work environment. Employees must be thoroughly instructed, trained and supervised.

Employees are also expected to think actively and be aware of hazards. This also applies to hazards that may arise from the use of a product, also e.g. in combination with another product. Hazards that are recognised and considered possible must be reported immediately to the responsible departments. Appropriate warnings must be provided for products, if necessary.

For us, acting in an environmentally conscious manner is not only a corporate duty, but also an important prerequisite for maintaining our profitability and competitiveness.

As a rule, strict licensing requirements apply to the construction and operation of chemical plants. Unauthorised operation, any deliberate or accepted exceeding of the limits set in an operating permit or the unauthorised discharge of substances into soil, air or water can lead to criminal prosecution of the responsible employees.

Safety must be maintained during the handling of environmentally hazardous substances and products, transport, loading and unloading, storage and chemical transformation. If a release of substances or a similar accident nevertheless occurs, the company's departments responsible for environmental protection must be informed immediately.

4. Corruption and granting of advantages

Our products and services convince through performance, quality and price.

Employees of a customer or other client may not be offered or granted any personal advantages, either directly or indirectly, whether in the form of money or other benefits, for preferential treatment in the award or handling of an order to Mipri GmbH.

Likewise, no personal advantages may be demanded or accepted for preferential treatment in the awarding or handling of a contract to suppliers or other third parties.

Contracts should always be concluded in writing. It must be ensured that performance and consideration are described in a sufficiently clear manner, are in reasonable proportion and that no unjustified personal advantages are granted by the contract.

As a matter of principle, no personal advantages may be offered or given to public officials, including those of foreign states. Bribery of public officials is prohibited worldwide under criminal law. Countries such as Germany and the USA also punish the bribery of foreign public officials.

The acceptance and giving of generally customary occasional or promotional gifts and gifts that are in keeping with custom and courtesy in a country are generally permissible.

Entertaining and inviting customers and business partners to the extent that is generally customary is generally permissible. However, when accepting and granting gifts, as well as in the case of hospitality and invitations, care must always be taken that a socially customary and appropriate financial framework is not exceeded. Even the appearance of a conflict of interest should be avoided. Particular restraint is required when inviting public officials.

5. Discrimination

All employees have the right to fair, courteous and respectful treatment by supervisors, co-workers and colleagues.

No one may be harassed, discriminated against or disadvantaged without objective reason because of their ethnic origin, skin colour, nationality, ancestry, gender, faith or ideology, political views, age, physical constitution, appearance or sexual orientation.

Every employee is obliged to respect the personal sphere of other employees. Sexual harassment and the use of violence in any form are prohibited.

6. Human rights

Mipri recognises, supports and respects the UNGPs. In addition, we are committed to observing and complying with the [10 Principles of the United Nations Global Compact](#), the Universal Declaration of Human Rights and fundamental labour rights as set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We strive to integrate human rights into our existing business operations in numerous ways, such as through risk assessments, awareness-raising activities, promotion of due diligence, strengthening of the legal framework, participation in joint actions, open dialogues and transparent reporting. We take appropriate corrective action when human rights are violated.

7. Conflicts of interest - private activity

Every employee must inform his or her superior and the responsible human resources department of the intention to take up a remunerated secondary activity or entrepreneurial activity. The same applies to the intended acceptance of a mandate in another company.

Private activity in associations, parties or other social, political or welfare institutions is welcomed by Mipri GmbH, but must not interfere with the fulfilment of official duties. In the case of private expressions of opinion in public, an employee may not refer to a function in the company.

Conflicts of interest between an employee's official duties and his or her personal interest are to be avoided. Behaviour in the private sphere which is contrary to or may affect the interests of the company shall also be avoided.

Suppliers or other contractors who are regularly or repeatedly commissioned by Mipri GmbH should in principle not be commissioned for private purposes by employees who can influence their commissioning.

8. Protection of company property and trade secrets

Trade secrets and other confidential information must be treated confidentially and protected from third parties. Employees who have access to business secrets and confidential information of Mipri GmbH or also of customers and business partners must not disclose them to third parties (including family members and friends) or use them for other non-official purposes.

When creating documents and data carriers, it must be taken into account that every written piece of paper and every data carrier can get into the hands of a third party and can be used against Mipri GmbH. This must already be taken into account when creating documents.

9. Compliance with the Code of Conduct and control

Every employee receives a copy of this Code of Conduct with his or her employment contract. It is also accessible in WIMAP. The management is obliged to include the Code of Conduct in employee training. The management of Mipri GmbH is also obliged to monitor compliance with the Code of Conduct. It is not sufficient to merely take note of this Code of Conduct. Instead, each employee is called upon to review his or her own conduct against the above benchmarks and to be aware of areas of activity where improvements can be made.

10. Legal references of the Code of Conduct

This Code of Conduct is a guideline that sets binding standards for management and all employees. Lawful and responsible behaviour is expected from the management and every employee of Mipri GmbH. Violations of the law and breaches of this Code of Conduct are not tolerated. As a rule, they also constitute a breach of service or employment contract obligations and may lead to serious sanctions. In the event of violations of the law and of this Code of Conduct, a warning, the assertion of claims for damages and, in serious cases, the termination of the service or employment contract must be expected. In the event of violations of criminal and administrative offence regulations, the company also reserves the right to file a report with the competent investigative authorities.

Anyone who becomes aware of a violation of the law or of a violation of this Code of Conduct, or who has a reasonable suspicion of such a violation, will protect the company if he or she informs his or her superior, the human resources department or the management. In most cases, this will also help the employees who committed the violation, because the company can then often take measures to avert or mitigate the possible damage.

Even if an employee believes that a breach of the law or a breach of this Code of Conduct will bring the company an economic advantage in the short term, this is no justification for conduct in breach of duty. Moreover, there is always the risk that such a breach will cause much greater damage to the company in the long term. Compliance with and adherence to laws, official regulations and company guidelines as well as ethical and responsible behaviour are a foundation for the long-term success of Mipri GmbH.

Bad Kreuznach, 15 July 2022
Mipri GmbH
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Management