



# Ethical Conduct Code

Mitutoyo Benelux

**Mitutoyo Nederland B.V**

**Mitutoyo Belgium N.V**

This Mitutoyo “Ethical Conduct Code” shows the standards, principles and assessment criteria which are the basis of our ethical conduct and applies to all our business activities. It should protect us and ensure that the reputation of the company and the Mitutoyo brand is not compromised.

All Employees – including executives - are responsible for behaving in accordance with the rules fixed in this Code of Conduct. We commit ourselves, without exception, to always make the ethically correct choice for every business decision that might involve a conflict between profit and ethics.

HENK SLOTBOOM, MANAGING DIRECTOR  
MITUTOYO BENELUX

### **BASIC STATEMENT**

We are well aware of our responsibilities as a supplier of products and varying services. Therefore, we will always act in compliance with relevant laws and regulations, as well as internal procedures, especially with regards to environmental protection, hazard

preventions by appropriate instruction and observation, product quality, product safety, and product reliability.

Should a problem arise, we will make every effort to prevent the occurrence of damage/loss and the recurrence of problems via the following measures:

- Investigating the facts
- Identifying the cause and the responsibility
- Communicating to those concerned (including involved parties outside of Mitutoyo)

## **1 RELATIONSHIP WITH BUSINESS PARTNERS**

### **1.1 Sales**

We conclude fair contracts with our sales partners in accordance with all laws and regulations, and fulfill the contractual obligations.

When hosting or giving gifts to sales business partners, we observe our internal regulations. We do not make concessions such as discounts or commissions in return for personal benefit.

## **1.2 Procurement**

We will determine procurement business partners based on rational, fair, and transparent criteria. Company interests and private interests of employees are strictly separated on both sides. Procurement decisions must always be made free of personal interests. We will not make use of our market position to impose or demand unfair restrictions on our suppliers.

## **1.3 Gifts, Benefits, and Invitations**

In business relationships, it may happen that gifts are exchanged or invitations are issued. The reason for this must never be the attempt to exert an unfair influence on the decision-making of the recipient.

Our detailed rules for dealing with gifts and invitations should protect us even from the appearance of any unfair influence. Basically, the following applies:

Benefits may be accepted or granted if they are of little value. Business hospitality invitations must be kept within reasonable limits.

## **1.4 Relationships with Government and Administration**

Regardless of the country, we will always comply with Government-related laws and regulations, and will not give or promise donations to any individual politicians, or other political organizations/parties

## **1.5 Maintaining and Promoting Free and Fair Competition**

We are committed to free and fair competition and comply with applicable laws and regulations. We ensure that we make no price adjustments or exchange sensitive information with competitors, customers, and suppliers and do not disseminate false information about their products or services.

Any form of corruption will be resolutely rejected. If someone notices the corrupt behavior of a colleague or business associate, they are encouraged to report it. All of these notes are kept strictly confidential.

## **2 COMPANY VALUES AND CONFIDENTIALITY**

### **2.1 Intellectual Property Rights of the Mitutoyo Group**

We will appropriately protect and utilize the intellectual property rights of the Mitutoyo Group such as technologies, brands, know-how, etc.

### **2.2 Intellectual Property Rights of Others**

Equally, we will respect the intellectual property rights of others and make every effort not to infringe upon such rights.

### **2.3 Trade Secrets**

We are aware of the value of our in-house know-how and always keep the business and trade secrets of both our company and the entire Mitutoyo Group.

We also protect the confidential information of third parties obtained through our business relationships and never share them with other parties. We, under no circumstances, seek access to trade secrets of other companies through illegal methods.

## **2.4 Data Protection**

Personal data, particularly of business partners and employees, may only be collected, processed or used to the extent necessary for specified, unambiguous and legitimate purposes.

We respect the personal rights of all employees, customers, suppliers, and business partners. We commit ourselves to the professional, lawful, and ethical handling of personal data.

## **3 RELATIONSHIP BETWEEN COMPANY AND EMPLOYEES**

### **3.1 Respect for Human Rights and Equal Opportunities**

We respect basic human rights and always behave in a way that excludes discrimination of any kind or a violation of human dignity.

All employees and applicants are evaluated solely on the basis of their qualifications, ability, suitability, and attitude. Any discrimination, improper discrimination or harassment based on characteristics such as gender, age, origin, religion, sexual orientation, or political belief will not be accepted or tolerated.

Especially supervisors must not behave in a manner that can be considered as discrimination, mental abuse, physical violence, or sexual harassment.

### **3.2 Exclusion of Unfair Labor Practice**

We adhere to employee protection laws and policies and never allow unlawful acts, such as undue labor practices, forced labor, and child labor as part of our entrepreneurial activities.

### **3.3 Safety and Health at the Workplace**

We want to prevent accidents and threats as best as possible.

We follow applicable laws and policies on safety and create good working conditions for our employees to protect them from both physical and mental harm.

### **3.4 Respect for the Opinion of Others**

We will respect the individual personality and opinions of others. We will explicitly ask our employees to express both positive and negative criticism.

We will convey proposals, concerns, and complaints in a manner which respects the rights and dignity of



others. No employee may be discriminated against because they have expressed their personal opinion.

### **3.5 Illegal or Unethical Conduct**

We will inform our immediate superior or the Compliance Officer in the case where we encounter any conduct that we suspect illegal or a violation of our ethics policy.

We will refuse any order to commit illegal or unethical acts. We will forward such incidents directly to the Compliance Officer when put at a disadvantage for our refusal to commit such acts.

### **3.6 Conflict of Interests**

Employees will not engage in any activity that might create a conflict between the interests of the company and their own individual interests.

## **4 SOCIAL RESPONSIBILITIES**

### **4.1 Contributing to World Peace**

We will comply with all laws and regulations aimed at maintaining world security and peace. We will not involve in any business transaction that threatens the maintenance of world peace. We respect the UN "Universal Declaration of Human Rights".

## **4.2 Environmental Protection**

We will make every effort to fulfill existing requirements for environmental protection and reduce harmful effects on the environment for every aspect of our business activities in advance.

## **4.3 Impartiality and Independence**

The technical management and personnel of our calibration laboratories, as well as the technicians performing on-site calibration at the customer, are free from any commercial, financial, or other influences that could affect their technical judgment in the exercise of their professional competence.

The influence of management, supervisors, as well as external persons or organizations on the test results is prohibited.

## **4.4 Communication, Marketing, and Events**

With regard to external communication, the employees will strictly adhere to the regulations of the “Ethical Conduct Code” and other internal company rules.

All of our activities in the areas of marketing/sales/promotion will be carried out in a fair, honest, and lawful manner and will be checked for compliance

with statutory regulations.

When organizing or participating in a gathering of competing companies we will always observe our internal rules to secure lawful conduct and to avoid any misconduct of participants especially with regards to fair competition.

## **5 TAX COMPLIANCE & EXPORT CONTROL**

In every country where we operate we fulfill our tax obligations and comply with the relevant legal regulations.

We comply with all EU and Member State dual-use trade control laws and regulations as well as internal guidelines. Business with companies or persons who are on sanction lists is prohibited.

We support the fight against money laundering through appropriate internal actions as an important element in the fight against organized crime and terrorism.

## REPORTING CONCERNS

Trust is one of the largest factors of success for our business. We ask you therefore sincerely to trust in Mitutoyo and each other and inform us about the problems you are facing before announcing to external bodies. Each employee should disclose a violation of this Compliance Policy or any other compliance issues which are not mentioned here to their immediate supervisor or the closest manager. If you feel uncomfortable with this please contact our Compliance Officer.

You also have the possibility of an anonymous complaint/notification via "[compliance@mitutoyo.eu](mailto:compliance@mitutoyo.eu)" to our external lawyer directly. All messages will be handled by them. If necessary, appropriate measures are taken.

All documents are kept confidentially within the legal framework. Reprisals against informants of any kind will not be tolerated.

Mitutoyo Benelux

[www.mitutoyo.nl](http://www.mitutoyo.nl) & [www.mitutoyo.be](http://www.mitutoyo.be)

The Mitutoyo logo consists of the word "Mitutoyo" in a bold, orange, sans-serif font. The letter "M" is stylized with a diagonal slash through it.