Professional Coating Systems



Mipa Supplier Code of Conduct

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Mipa Code of Conduct

for suppliers and partners of Mipa Group

MIPA SE and its subsidiaries are committed to ecologically and socially responsible corporate governance. We expect the same behaviour from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to make them an integral part of the corporate culture. Furthermore we aim to further optimise our entrepreneurial activities and our products in terms of sustainability and we ask our suppliers to contribute to this to this as part of a holistic approach.

For the future cooperation, the contracting parties agree on the compliance with the following regulations for a common code of conduct. This agreement is the basis for all future deliveries and defines the minimum standards for all companies supplying goods or services to MIPA. These minimum standards reflect the corporate values of the Mipa Group and apply to all suppliers as well as their subsidiaries and branches throughout the world.

The contractual partners commit to comply with the principles and requirements of the Code of Conduct. We request suppliers to obligate their subcontractors to comply with the standards and regulations set out in this document. This agreement shall enter into force upon signature. Any violation against this Code of Conduct may be cause and occasion to terminate the business relations including all related supply contracts.



Compliance with the relevant laws

The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Children's Rights and Business Principles, the United Nations on Business and Human Rights, the international labour standards of the International Labour Organization as well as the United Nations Global Compact. Suppliers has to act in full compliance with all relevant laws, rules, requirements of standards and regulations at all times.

Social responsibility

Suppliers must uphold the human rights of their employees and treat them with dignity and respect.

Ban on Child labour

Child labour must not be used at any stage of production. We request suppliers to adhere to the recommendation from the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory schooling ends and in any case not less than 15 years.

Exclusion of forced labour

Suppliers must not support or use forced labour, slave labour, bonded labour or human trafficking. All work must be voluntary and workers must be able to leave work or employment at any time. Furthermore, unacceptable treatment of employees, such as psychological hardship or sexual and personal harassment must not be tolerated.

Fair pay and working hours

The remuneration paid to the employees must comply with all applicable laws on wages, including, for example, laws on minimum wages or overtime. If the legal minimum wage does not cover the cost of living, the business partner is obliged to pay a wage that covers the basic needs. Deductions from wages as a disciplinary measure shall not be permitted. Employees shall be informed regularly about the particulars of their wages for the pay period concerned each time that they are paid.

Working hours must comply with all relevant laws or benchmark industry standards.



Non-discrimination rule

Suppliers shall hire employees solely on the basis of their professional skills. They do not use or permit physical discipline. They do not threat with violence or actually use it. Suppliers do not engage in discrimination or harassment based on gender, race, colour, religion, ethnicity, social background, age, sexual orientation, national origin, disability, political opinion or any other legally protected characteristics.

Freedom of association / Freedom of assembly

Suppliers shall respect the right of employees to freedom of association, to union membership, to appeal to labour representatives or to work s council membership in accordance with local laws. Employees shall communicate openly with management without fear of reprisal or harassment. Suppliers respect the freedom of assembly and the formation of interest groups and advocate for the protection of the rights of employees.

Animal Welfare

Our suppliers are obliged to comply with the applicable animal welfare laws and standards. Animals must be treated with respect and in a manner appropriate to their species. Animal suffering and unnecessary pain and distress must be avoided.

Health and safety in the workplace

Suppliers are responsible for a safe and healthy working environment. MIPA focuses on reconciling technical progress with health protection and on avoiding risks to people.

Suppliers are responsible for the health and safety of their employees. They shall ensure a safe working environment and minimise physical and chemical hazards through proper design, technical and administrative inspections, preventive maintenance and safe working practices, as well as regular safety training.

Suppliers shall provide their employees with appropriate personal protective equipment and ensure that physical guards, interlocks and barriers are in place wherever machinery poses a potential risk of injury to workers.

In addition, suppliers shall provide training on health and safety issues to ensure that employees are properly educated and trained.



Environment

For the Mipa Group, environmental protection is an essential part of business practice.

Treatment and discharge of industrial waste water

Industrial effluents from operations, manufacturing processes and sanitary facilities should be identified, monitored, inspected and, if necessary, treated prior to discharge or disposal. In addition, measures should be taken to reduce wastewater generation.

Dealing with air emission

General emissions from operations (air and noise emissions) as well as greenhouse gas emissions shall be identified, routinely monitored, inspected and, if necessary, treated prior to their discharge. Suppliers are also responsible for monitoring their pollutant emission control systems and are required to find economic solutions to minimise any emission.

Handling waste and hazardous substances

Suppliers shall follow a systematic approach to identify, handle, reduce and responsibly dispose or recycle solid waste. Chemicals or other materials that pose a hazard if released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal.

Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of all kinds, including water and energy, must be reduced or avoided. This is achieved either directly at the source or through procedures and measures, e.g. by modifying production and maintenance processes or procedures in the company, by using alternative materials, by economizing, recycling or reusing materials.

Managing energy consumption / efficiency

Energy consumption shall be monitored and documented. Economic solutions need to be found to improve energy efficiency and to minimise energy consumption.

Biodiversity, land use and deforestation

The supplier undertakes to protect biodiversity, preserve natural habitats and minimise the negative impact of its business activities on ecosystems. Land use and procurement must not contribute to illegal deforestation or the destruction of ecosystems worthy of protection.



Soil quality

The supplier undertakes to prevent soil contamination and soil degradation. Materials, chemicals and waste must be managed responsibly in order to preserve soil quality in the long term.

Land, forest and water rights, and forced evictions

The supplier shall respect legitimate land, forest and water rights, as well as the rights of affected local communities and indigenous peoples. Unlawful land grabbing and forced evictions are prohibited. Changes in land use must be carried out in accordance with applicable laws and the rights of those affected.

Renewable energy

We expect our suppliers to use energy responsibly and to continuously reduce their CO_2 emissions. The use of renewable energy sources, such as solar, wind or hydroelectric power, should be encouraged and continuously expanded within the limits of operational feasibility.

Ethic and Compliance

Suppliers commit to uphold the highest standards of ethical conduct in their interactions with their personnel, customers and other relevant stakeholders.

Fair competition

Suppliers must accurately and fully report and disclose information about their business, structure, financial condition and performance in accordance with applicable laws as well as recognised industry practices.

In particular, with regard to worldwide business activities, suppliers shall ensure compliance with all applicable laws for the import and export of goods, services and information as well as with applicable embargoes and sanctions.

Equality of opportunity / discrimination

Suppliers promote diversity in the company and does not tolerate discrimination in the recruitment and employment of employees (ILO conventions).

Fraud, extortion, theft, intellectual property

Suppliers shall forbid any form of fraud, extortion, theft (amongst others **counterfeiting of parts**) or embezzlement by their personnel. Suppliers must safeguard all intellectual property rights and protect infor-



mation of the Mipa Group. The transfer of technologies and company know-how must be carried out with full respect of all intellectual property rights. We expect our suppliers to implement processes and procedures and to exercise all the diligence required to detect and eliminate counterfeit products.

Non-disclosure/ privacy

Suppliers undertake to meet the reasonable expectations of their principal, suppliers, customers, consumers and employees with regard to the protection of private information. Company and business secrets as well as confidential information of which employees become aware in the course of performing their duties must be kept secret.

Suppliers shall observe the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and forwarding personal information. In the event of the termination of the employment, the obligations of confidentiality shall survive such termination.

Corruption / bribery, taking advantage, conflicts of interests

Suppliers avoid conflicts of interest that may result in corruption.

All business activities shall be based on the highest integrity standards. MIPA undertakes to comply with all anti-corruption laws. Suppliers must pursue a policy of "zero tolerance" against any form of bribery, corruption, extortion and embezzlement.

Suppliers shall have governance and processes to monitor adherence to standards to ensure compliance with anti-corruption laws.

Conflict Minerals

MIPA must ensure that the products it sells do not contain „Conflict Minerals" (minerals associated with tin, tantalum, tungsten and gold) sourced from entities that directly or indirectly fund the conflict in the Democratic Republic of Congo or neighbouring countries. Suppliers shall: (I) conduct due diligence on their supply chains to determine whether products are sold to MIPA that contain tin, tantalum, tungsten or gold, and if so, the extent to which these metals are sourced from conflict-free smelters;
(II) report the results of this monitoring to MIPA so that MIPA can comply with its legal obligations and achieve the objectives set out in its policy and (III) commit to being or to becoming "conflict-free" so that all metals are sourced exclusively from conflict-free smelters.

Use of private or public security forces

The use of private or public security forces must be carried out with due regard for human rights and applicable laws. Intimidation, the use of disproportionate force and inhuman or degrading treatment are prohibited.

Financial Responsibility and Accurate Record-keeping

The supplier undertakes to ensure transparent and responsible financial reporting. Business transactions must be documented in a complete, accurate and verifiable manner. The manipulation of records, tax evasion, corruption and fraudulent financial practices are prohibited.



Implementation of the requirements

The Mipa Group expects its suppliers to identify risks within their supply chains and to take reasonable measures. In the event of suspected breach and for safeguarding supply chains with increased risks, the company requires the disclosure of supply chains.

MIPA will verify compliance with the standards and regulations set out in this document through a self-assessment questionnaire and sustainability audits at supplier production sites.

The company reserves the right to take appropriate action against suppliers who do not comply with this Code, which may ultimately result in the suspension or termination of the supply relationship.

Application / whistleblowing / protection against retaliation

Suppliers will contract their suppliers and/or subcontractors to adhere to the standards of behaviour in line with the terms of this Code. Suppliers confirm that they have internal processes for reporting any concern and instance of non-compliance with this Supplier Code. Suppliers shall not retaliate against anyone for raising and disclosing a true concern about business integrity.

MIPA reserves the right to audit the suppliers' suppliers and/ or subcontractors for compliance with this Code and suppliers shall support MIPA's audit as required. Suppliers shall also ensure that their personnel comply with the terms of this Code when goods or services are supplied to MIPA.



Procedure in the event of violations

The executive board and the managers bear particular responsibility for complying with the Supplier Code. They shall take reasonable steps to ensure that no violations of statutory provisions, internal guidelines or this Code occur in their field of responsibility, which could have been prevented or made more difficult if they had properly fulfilled their supervisory and organisational duties, and that any violations are identified, prosecuted and remedied.

However, this does not release employees from their responsibility for their actions. All employees are responsible for their personal behaviour.

Adherence to this Supplier Code of Conduct will be verified through periodic audits. MIPA reserves the right to take disciplinary actions in the event of violations of statutory provisions, internal regulations or this Code.



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