

MÜPRO Group Code of Conduct

A cornerstone of the success of the MÜPRO Group (hereinafter 'MÜPRO') is the trust of its customers, employees and other stakeholder groups in its integrity and performance capability. This is based on compliance on the part of all individuals acting for or on behalf of MÜPRO.

The senior management teams of the MÜPRO Group/companies are expressly committed to compliance with legislation, internal regulation and binding voluntary commitments and expect the same from all individuals acting for or on behalf of MÜPRO. MÜPRO does not tolerate any breaches of the law and systematically pursues misconduct on the part of anyone acting for MÜPRO.

MÜPRO has enacted the following Code of Conduct, which obligates all employees of MÜPRO companies to comply with a clear set of rules. The scope of this document also encompasses business partners (such as agents and distributors) and all suppliers of the Group.

Enacted for MÜPRO Services GmbH, Wiesbaden, March 2022.

Dr Wolfgang Gödel,

Ulrich Hofmann

CEO

CFO

Jörg Matthias Klatt

COO



Corporate integrity

As a sales-oriented group of companies, MÜPRO attaches considerable importance to sales compliance, i.e. legally irreproachable conduct in day-to-day sales. We are committed to fair competition as an incentive for innovative and high-quality products and services that benefit our customers and partners. MÜPRO, its employees and its partners foster fair competition and are committed to full compliance with cartel and competition law, as well as corresponding internal regulations.

Corruption and bribery

Generally speaking, corruption is when someone request/accepts or offers/grants personal advantages in connection with a business activity or public office. As corruption generally distorts competition and, where a public office holder is involved, threatens the integrity of government conduct, it is legally prohibited in virtually every country.

At MÜPRO, all forms of corruption and bribery, including facilitation payments, are banned.

Facilitation payments are payments, often made to an office holder, in an effort to initiate or speed up routine (official) procedures to which the party making the payment is entitled.

Money laundering

Money laundering is the practice of concealing illegally obtained income and circulating it in legal economic and financial activities. MÜPRO observes applicable legislation to prevent money laundering and the funding of terrorism.

At MÜPRO, it is not permitted to make or receive payments in cash. Cash sales at service centres in Germany represent the only exception to this rule.



Import/export and export control

National and international legislation governs the trading of goods, services and technologies, as well as the handling of such transactions. Every employee or partner acting on behalf of MÜPRO must observe and comply with the applicable foreign trade and customs regulations of the country/economic area concerned in respect of cross-border transactions (sale/purchase) and goods movements (import/export) involving products, services and technologies/information.

Moreover, MÜPRO is aware of the applicable regulations on export control and reviews whether relevant export controls apply to international transactions. Where applicable, any necessary export licences will be obtained (export control)

Conflicts of interest

MÜPRO places great emphasis on ensuring that private and business interests are kept strictly separate. Personal relationships and the interests of employees and partners may not influence the business activities of MÜPRO.

Data protection

MUPRO avails itself of technologies for the electronic sharing of information, both for its own business purposes and for future innovative applications, However, MÜPRO is conscious of the associated risks. When handling the personal data of its employees and business partners, MÜPRO therefore protects and respects the personal rights and privacy of the individuals concerned. In the process, MÜPRO follows a consistent, company-wide set of standards and applicable legislation; in Europe, this refers, in particular, to the GDPR and national supplementary provisions.

External communication

MÜPRO is committed to open, transparent, consistent and reliable communication towards all stakeholder groups.



Working environment and social aspects

As a group of companies with global operations, MÜPRO observes, in particular, the Universal Declaration of Human Rights, the ten principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

Without prejudice to the equal importance of all human rights, MÜPRO attaches special significance to

- the right to equal opportunities and the right to not be discriminated against
- the prevention of all forms of child and forced labour
- the right to free assembly and the right to negotiate collective bargaining agreements
- fair pay and benefits in accordance with local market conditions
- compliance with applicable working time regulations

MÜPRO is an employer and partner who takes equal opportunities, diversity and fair and responsible interpersonal dealings seriously and therefore expects employees and partners to behave accordingly in their business dealings. In particular, all employees and partners must respect the rights of others, as well as country-specific and cultural differences in terms of business dealings. No employee, other MÜPRO worker, applicant or business partner may be treated unfairly, favoured, disadvantaged or excluded for reasons of race, ethnic origin, skin colour, gender, religion or world belief, physical make-up, appearance, age, sexual identity or any other characteristic protected by law.

In this regard, our conduct is based on statutory regulations (e.g. the German General Act on Equal Treatment) and European and global guidelines and principles underpinning legislation (e.g. the 1948 Universal Declaration of Human Rights above).

Responsibility in the supply chain

We are also committed to the observance of human rights and environmental standards throughout supply chains and demand this from all our suppliers. The basis in this regard are the standard stipulated in the German Duty of Care in Supply Chains Act (LkSG).



Occupational health and safety

MÜPRO takes the health and safety of its employees very seriously and adopts appropriate measures to prevent work-related injuries, health problems and illnesses. MÜPRO strives to completely eliminate workplace accidents and observes, without exception, all applicable national workplace safety laws and regulations, as well as the corresponding requirements for the design of working environments.

Corporate social responsibility

MÜPRO is keenly aware of its responsibility to others. We therefore engage in targeted initiatives for the benefit of society, both at regional and national level. This excludes direct or indirect donations/gifts to political organisations, parties and individual politicians.

Environment and sustainability

MÜPRO aims to continuously improve the environmental compatibility of its business operations while treating and using resources and the environment gently and responsibly.

In addition to current environmental legislation, this comprises the following tenets:

- Eco-friendly manufacturing
- Resource-saving use of products
- Packaging and recycling

Therefore, MÜPRO already considers the optimised use of natural resources during the product development and product design phases. For us, continuous improvement of our manufacturing methods and processes in respect of environmental protection aspects is a matter of course. When selecting our partners and suppliers, we do, of course, set the same standards that we expect from ourselves in terms of environmental protection.

It goes almost without saying that MÜPRO complies with national and international statutory requirements and standards in the area of environmental protection.



Reporting breaches/whistle-blower system

All employees and external business partners of MÜPRO are expressly encouraged to contact their direct line manager or the senior management team of MÜPRO or the relevant MÜPRO company if they have identified compliance issues or have concerns in this area.

The dedicated email address may also be used:

compliance@muepro.de

Individuals who have reported an alleged breach of the law or Group guidelines may not be punished. If such punishments are issued, disciplinary measures will be initiated against those who issued the punishment.

The identity of the whistle-blower will be kept secret insofar as permissible pursuant to the law, company policies and the needs of an effective investigation.

All MÜPRO employees and partners (worldwide) may submit information in complete confidence to the following postal address:

MÜPRO Services GmbH
Compliance
Borsigstrasse 14
65205 Wiesbaden
Deutschland/Germany