



Code of Conduct

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Code of Conduct

1. Foreword

The Mitutoyo Code of Conduct describes the values, principles, and standards that guide our daily actions in all areas of our business activities.

It serves not only as a clear guide for responsible and ethical behavior, but also as protection for all of us, ensuring that the good reputation of our company and the Mitutoyo brand are not damaged.

Whether in management or in operations, each and every one of us has a responsibility to live these principles in our daily work. Especially in situations where economic interests and ethical considerations may conflict, we consistently choose the morally right path.

With your personal contribution, integrity, and sense of responsibility, you - whether as part of our team, as a business partner, or as a customer - play a decisive role in enabling us to work together in a trusting, respectful, and successful manner.

Thank you for your commitment and the trust you place in us.

Ray Penny

President, Mitutoyo Europe GmbH

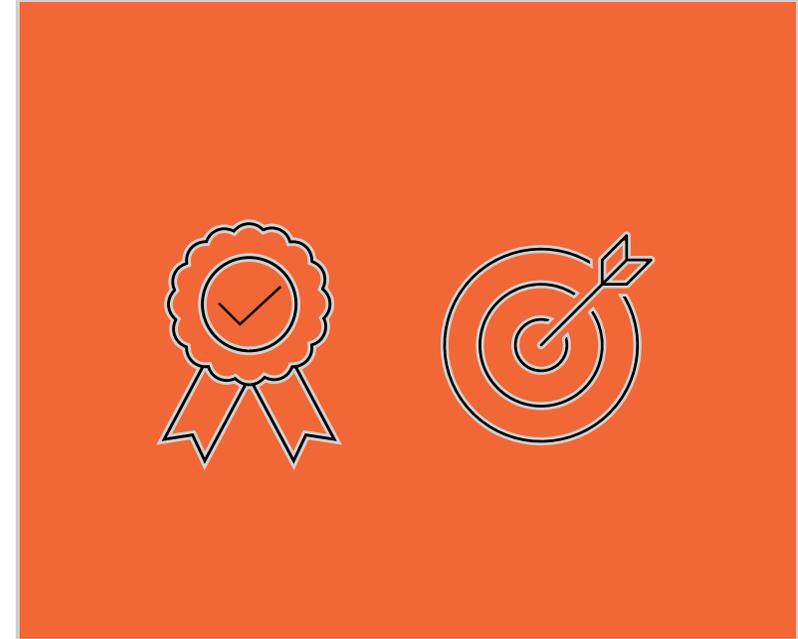


2. Trust through honest and lawful conduct of business

We can only continue to achieve these goals if everyone involved plays their part. That is why the Code of Conduct sets out binding requirements for all employees.

Employees must comply with all relevant laws and official regulations in their working environment, as well as internal instructions and guidelines. Employees are required to behave honestly and fairly in their working environment and to avoid any conflict between their private interests and the business interests of Mitutoyo or the interests of our customers.

All employees are expressly encouraged to speak to the Compliance Manager or their supervisor if they notice that someone is not complying with the rules. This can prevent small problems from becoming big ones. No employee who makes a report in good faith need to fear any disadvantages, even if the report turns out to be unfounded. Reports can also be made anonymously.



Managers have a role model function. They are responsible for their own conduct and the conduct of the employees in their area of responsibility, as well as for the proper compliance with all procedures provided for there to avoid reputational and legal risks.

Mitutoyo

3. Respectful interaction with each other – prohibition of discrimination, development according to performance and potential

Our success is also based on treating each other with respect. We are willing to learn from mistakes and value open communication. The key criteria for employee development are performance and potential. We respect the individual personalities and opinions of others. We expressly encourage our employees to offer constructive positive and negative criticism. We express suggestions, concerns or complaints in a manner that respects the rights and dignity of others. No employee may be disadvantaged in any way because of their personal opinion.

Mitutoyo does not tolerate any discrimination or harassment in the workplace, whether based on age, disability, origin, gender, political views or trade union activity, race, religion or sexual orientation.





4. Protection of personal data and confidential information

We strictly adhere to the regulations governing the protection of personal data. Confidential information and documents relating to customers or employees must be adequately protected from access by third parties and colleagues who are not involved.

Personal data may only be collected, processed or used to the extent necessary and where there is a legal basis for doing so or the consent of the data subject has been obtained. The use of data must be transparent to the data subjects. Your rights to information and correction, and, where applicable, to objection, blocking and deletion, must be upheld. Appropriate standards in line with the state of the art must be maintained when it comes to technical protection against unauthorised access to data and information.

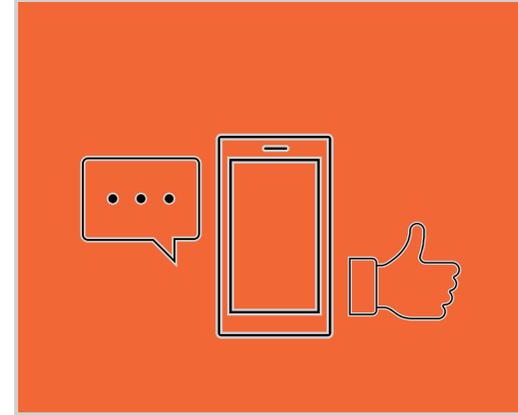
Mitutoyo has issued further data protection and information security guidelines on this subject, to which explicit reference is made.



5. Customers, business partners and the public

All Mitutoyo announcements and reports must be complete, honest, accurate, timely and understandable, whether they are intended for business partners, customers or the general public. This applies in particular to information and advertising material about our products.

Information about Mitutoyo, our products, our customers or business partners may only be disclosed to business partners, customers or the public by authorised employees. We conclude fair contracts with our sales partners in accordance with all laws and guidelines and fulfil our contractual obligations.



6. Social networks

Anyone who comments on topics relating to Mitutoyo or our business partners in public discussions or on social networks should make it clear that they are acting as a private individual and have the interests of Mitutoyo and its business partners in mind.

Please bear in mind that comments made in emails or on social networks may be informal and spontaneous, but they will nevertheless be recorded and visible to the recipient or the Internet public for a long time.

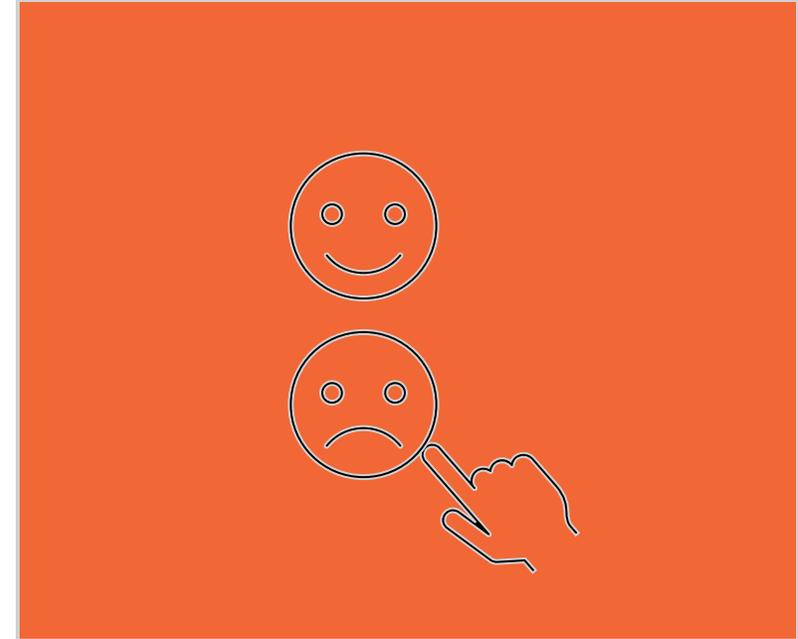
7. No conflicts of interest with customers and business partners

Mitutoyo aims to build sustainable business relationships with its customers and business partners for mutual benefit.

Every employee must therefore ensure that the interests of our customers are taken into account in a fair manner. The interests of customers or business partners must not be prioritised to the detriment of other customers.

We select business partners in the area of procurement based on rational, fair and transparent criteria. The interests of the company and the private interests of employees are strictly separated on both sides. Procurement decisions must always be made free of personal interests.

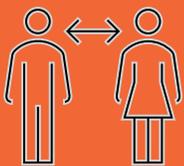
We prefer suppliers and partners who pursue sustainable and ethical business practices. Products and services should be procured under fair conditions and with as little environmental impact as possible.



8. Customer complaints

Customer complaints provide valuable information about opportunities for improvement in our business and, when handled correctly, offer an opportunity to strengthen or regain customer relationships.

Mitutoyo ensures that all customer complaints are dealt with promptly in a fair and transparent manner.



9. Personal conflicts of interest

If employees find themselves in conflicts between their personal interests and their professional duties or the interests of Mitutoyo or our customers, this can damage the reputation of these employees and Mitutoyo as a whole. Employees should therefore avoid such situations in the interests of Mitutoyo and in their own interests.

Specifically, the following applies:

- *No secondary employment that interferes with the time required to fulfil employment contract obligations or the competitive interests of Mitutoyo.*
- *Secondary employment must be reported in advance to the supervisor and the Human Resources department. Honorary positions of a limited duration do not need to be reported.*
- *No financial investments in companies that may be affected by the employee's professional decisions or by Mitutoyo.*
- *The awarding of contracts to relatives, partners or other persons close to employees must be reported to the supervisor and Compliance in advance. This also applies to transactions with companies in which relatives are directly or indirectly involved.*
- *No direct reporting lines between children, parents, spouses or partners.*
- *No assumption of positions of corporate responsibility (e.g. member of a governing body, managing director, executive board, supervisory board, advisory board) at customers, business partners or competitors without the prior consent of management after reporting to Compliance.*

In cases of doubt, please consult the Compliance Manager. The perception of third parties is decisive. Even the appearance of a personal conflict of interest is damaging.

10. Gifts, business lunches and events

Gifts, invitations to business meals or events can contribute to the promotion of business relationships, but must be handled with care. Gifts or invitations must never be used to gain unfair advantages or influence the judgement.

To avoid misunderstandings and maintain professional independence, we ask to observe the following rules:

- Business-related invitations and hospitality: Appropriate business invitations are generally acceptable.
- Promotional gifts: Small promotional items (giveaways) may be accepted.
- Gifts worth up to EUR 50: Employees may not accept gifts, invitations, or other benefits that could influence their decisions or create a conflict of interest. Gifts with a market value of up to EUR 50 are generally not critical, as long as they are not given in connection with upcoming contract conclusions, sent to a private address or given in any other non-transparent manner.
- Any exception requires written approval from a supervisor and must be documented.



- Giving Gifts to Business Partners: Gifts to customers, suppliers, or dealer partners may only be reasonable, transparent, and business-related. Gifts exceeding €100 require approval from top management and must not compromise the recipient's decision-making or create the appearance of bribery.

No acceptance of cash or gifts of monetary value: Cash, cheques, gift vouchers and similar gifts may not be accepted under any circumstances. In case of doubt, consult Compliance.

11. No tolerance of corruption

Our success in the market is based on performance, flexibility and service readiness and must not be achieved through unfair payments. Our business partners trust in the professional judgement of our employees.

Mitutoyo therefore does not tolerate any form of bribery or corruption, acceptance of benefits or granting of benefits. Anyone who fails to observe the rules for gifts and invitations runs the risk of being prosecuted for corruption offences.

Even promising or demanding unfair advantages can be punishable by law.



12. Protection of competition

Mitutoyo does not participate in illegal agreements or practices that restrict competition, in particular agreements with competitors on prices, terms and conditions, and market sharing.

Before deviating from standard contracts or the procedures set out in cooperation agreements, employees must consult with the legal department to ensure that this does not have any inadmissible effects under competition law.





13. Protection of company assets, trade secrets

Mitutoyo's assets, business facilities, business documents and work equipment must not be misused for private purposes or made available to third parties if this could harm Mitutoyo's interests.

We are aware of the value of our company's know-how and always protect the trade and business secrets of both our company and the entire Mitutoyo Group. We also protect confidential information obtained from third parties in the course of our business relationships with them and do not disclose it to other parties. We never seek access to other companies' trade secrets through illegal means.

We protect the intellectual property of the Mitutoyo Group, such as technologies, trademarks, know-how, etc., and use it appropriately.



14. Protection of Natural Resources - Sustainability

Employees should strive to protect natural resources in their work and ensure that Mitutoyo's business activities have as little impact on the environment as possible through material conservation, energy-saving planning, and waste reduction and recycling. When selecting suppliers, advertising materials or other external services, every employee should consider ecological and social criteria in addition to economic aspects. All employees are required to use energy, water and materials efficiently, minimise waste and dispose of it correctly.

Our goal is to continuously reduce our company's ecological footprint. This includes measures such as environmentally friendly mobility, climate-neutral events and resource-saving production processes. We are committed to using natural resources responsibly.

15. Occupational safety

Processes, operating facilities and equipment must comply with applicable legal and internal requirements regarding occupational safety, health, fire safety and environmental protection. Mitutoyo has issued further occupational safety guidelines for this purpose, to which explicit reference is made.

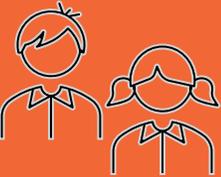
16. Export controls, tax laws

In every country in which we operate, we comply with our tax obligations and adhere to the relevant legal regulations. We support the fight against money laundering through appropriate internal measures as an important element in the fight against organised crime and terrorism.

We comply with all foreign trade regulations on export control resulting from international or national regulations and internal guidelines. Transactions with companies or individuals on sanctions lists are prohibited.

17. Child labour

We do not tolerate child labour in any way, i.e. we completely reject any use of children as workers in any business, whether by ourselves or by our suppliers. Child labour is defined as work performed by children who are either younger than 15 years of age, younger than the legally prescribed minimum age, or younger than the age for completing compulsory schooling (an exception applies to regulated forms of apprenticeship training), whichever of the three is higher.



18. Impartiality and independence

The technical management and staff of our calibration laboratories, as well as the technicians who perform calibrations at the customer's site and the staff who organise and report on ILCs (inter-laboratory comparisons), are free from any commercial, financial or other influence that could impair their technical judgement in the exercise of their professional competence.

Any influence on the (test) results by management, superiors or other departments, as well as external persons or organisations, is excluded.



19. Consequences of violations

Violations of these rules can result in significant reputational damage and legal disadvantages for the employees concerned, their colleagues and Mitutoyo, including fines, criminal proceedings or restrictions on official permits.

In addition, violations that constitute a breach of employment contract obligations may result in employment law measures being taken by Mitutoyo.



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