

Code of Conduct (Long Version)

Mitutoyo Europe GmbH

1. Introduction

This Mitutoyo Code of Conduct shows the standards, principles, and evaluation criteria we use as a basis for our ethical behavior and applies to all our corporate activities. It is intended to protect us and ensure that the company's reputation and the Mitutoyo brand are not compromised.

Everyone at Mitutoyo - managers and employees alike - is responsible for behaving in accordance with the rules set forth in this Code of Conduct in their daily business activities.

We are committed to taking the ethically correct course in every business decision that may involve a conflict between profit and ethics, without exception.

Thank you for your continued support.

Shigeyuki Sasaki

President, Mitutoyo Europe GmbH

2. Trust Through Honest and Faithful Management of Business – A Personal Challenge and the Result of Joint Efforts

We can only continue to achieve these goals if everyone involved cooperates. The Code of Conduct therefore formulates binding requirements for all employees.

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

All employees are strongly encouraged to speak to the Compliance Manager or their supervisor if they become aware that someone is not behaving in accordance with the rules. This can prevent small problems from becoming big ones. No employee who makes a report with good intentions need 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 employees in their area of responsibility, as well as for the proper observance of all procedures laid down there to avoid reputational and legal risks.

3. Respectful Treatment of Each Other – Prohibition of Discrimination – Development according to Performance and Potential

Our success is also essentially based on respectful interaction with one another. We are prepared to learn from mistakes and value open communication. The essential criteria for employee development are performance and potential.

We respect the individual personality and opinion of others. We expressly encourage our employees to offer constructive positive as well as 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 his or her personal opinion.

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

4. Protection of Personal Data and Confidential Information

We strictly observe the regulations on the protection of personal data. Confidential information and documents about customers or employees must be suitably protected from the insight of third parties as well as colleagues not involved.

Personal data may only be collected, processed or used if necessary and if there is a corresponding legal basis or the consent of the person concerned. The use of data must be transparent for the data subjects. Their rights to information

and correction and, if applicable, to objection, blocking and deletion must be safeguarded. In terms of technical protection against unauthorized access to data and information, an appropriate standard must be maintained which corresponds to the state of the art.

Mitutoyo has issued more extensive data protection and information security guidelines in this regard, to which express reference is made.

5. Communication with Customers, Business Partners, and the Public

All Mitutoyo announcements and reports must be complete, honest, accurate, timely, and understandable. Be it to business partners, customers, or the public. This applies in particular to information and advertising material about our products.

Information to business partners, customers, or the public about Mitutoyo, our products, our customers, or business partners may only be provided by employees authorized to do so. We enter fair contracts with our sales business partners in compliance with all laws and regulations and fulfill contractual obligations.

6. Social Networks

Anyone who comments in a public discussion or on social networks on topics which affect Mitutoyo, or our business partners should make it clear that they are acting as a private person and have the interests of Mitutoyo and the business partners in mind.

Please take into account that statements in e-mails or social networks can be made informally and spontaneously but are then nevertheless recorded and can be viewed by the recipient or the Internet public for a long time.

7. No Conflicts of Interest with Customers and Business Partners

Mitutoyo strives to maintain mutually beneficial business relationships with its customers and business partners.

Every employee must therefore ensure that the interests of our customers are considered in a fair manner. Interests of customers or business partners must not be given priority to the disadvantage of other business partners. We select business partners in 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.

8. Customer Complaints

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

Mitutoyo ensures that all significant customer complaints are handled promptly in a fair and understandable manner.

9. Personal Conflicts of Interest

If employees get into 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 of Mitutoyo as a whole.

Employees should therefore avoid such situations in the interest of Mitutoyo as well as in their own interest. The following applies in detail:

- No sideline activities which affect the time scope of the duties under the employment contract or the competitive interests of Mitutoyo. Secondary activities must be reported in advance to the supervisor and the Human Resources Department. Honorary positions of limited duration do not have to be reported.
- No financial interests in companies that may be affected by professional decisions made by the employee or Mitutoyo.

- The placing of orders/contracts with relatives, life partners or other related persons of employees must be reported in advance to the supervisor and Compliance. This also applies to transactions with companies in which relatives have a direct or indirect interest.
- No direct reporting lines between children, parents, spouses, or domestic partners.
- No acceptance of positions of entrepreneurial responsibility (e.g. member of governing bodies, managing director, board of directors, supervisory board, advisory board) with customers, business partners or competitors without the prior consent of the management after notification to Compliance.

In cases of doubt, please consult Compliance. 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, business meals and events for informational, representational or entertainment purposes may be a legitimate means of establishing and supporting business relationships. However, they may never be used to gain unfair business advantages and may never be given to such an extent or in such a manner that the professional independence and judgment of the parties involved are called into question.

By observing the following rules, employees can protect themselves from misunderstandings:

- No objections to entertainment and meal invitations on a reasonable scale that are directly business-related.
- No objections to giveaways.
- In principle, there are no objections to gifts with a market value of up to EUR 35 (guideline) unless they are sent to the private address promptly before the conclusion of a contract or negotiations, or in another non-transparent manner.
- Never cash or money substitutes, such as checks or gift certificates.

In case of doubt, Compliance should be consulted.

11. Donations and Sponsoring

The management decides on donations and sponsoring. They may not be used to indirectly obtain unfair advantages from business partners.

12. No Tolerance of Corruption

Our success in the market is based on performance, flexibility and service and must not be cheated by unfair benefits. Our business partners trust in the professional judgment of our employees.

Mitutoyo therefore does not tolerate any form of bribery or corruption, acceptance of benefits or granting of advantages. Anyone who does not observe the rules for gifts and invitations in No. 10 runs the risk of becoming liable to prosecution for corruption offenses. Even the promise or demand of unfair advantages can be punishable.

13. Protection of Competition

Mitutoyo does not engage in illegal anticompetitive agreements and practices, particularly agreements on prices, terms, and market allocation with competitors. Before deviating from standard agreements or the procedures provided for in cooperation agreements, employees check with the Legal Department to ensure that there are no unlawful competitive implications.

In contacts with competitors and business partners, Mitutoyo employees will not discuss internal matters, such as prices and terms of sale or financing, costs, market overviews, organizational procedures, or other confidential information from which competitors or business partners could derive competitive advantage, without prior clarification with Compliance.

14. Protection of Corporate Assets and Protection of Natural Resources

Mitutoyo's assets and business facilities, business records, and work equipment may not be misused for private purposes or given to third parties if this could harm Mitutoyo's interests.

We are aware of the value of our company know-how and always protect the trade and business secrets of both our company and the entire Mitutoyo Group. Likewise, we protect confidential information of third parties obtained in the course of our business relations with them and do not disclose it to other parties. We never seek access to other companies' trade secrets through illegal methods. We protect the intellectual property such as technologies, brands, know-how, etc. of the Mitutoyo Group and use them appropriately.

Employees shall strive in their work to protect natural resources and to ensure that Mitutoyo's business activities have the least possible impact on the environment through material conservation, energy-saving planning, and the reduction and recycling of waste. When selecting suppliers, advertising materials, or other external services, each employee should consider environmental and social criteria in addition to economic considerations.

15. Occupational Safety

Processes, operating sites and resources must comply with the applicable legal and internal requirements for occupational safety as well as health, fire and environmental protection.

Mitutoyo has issued more extensive occupational safety guidelines in this regard, to which express reference is made.

16. Export Control, Tax Laws

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

We comply with all foreign trade regulations on export control arising from international or national regulations and internal policies. Business with companies or persons on sanctions lists is prohibited.

16. Consequences for Violations

Violations of these rules may result in significant reputational damage and legal disadvantages for the employees concerned, their colleagues, and Mitutoyo, up to and 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 by Mitutoyo.