



# CODE OF CONDUCT

December 2025

**MISUMI Europa GmbH**

Franklinstraße 61-63, 60486 Frankfurt am Main, Germany

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# 1. PREFACE

**Dear employees and business partners,**

Since its establishment as Europe's regional subsidiary of MISUMI Group Inc. in 2003, **MISUMI Europa GmbH** has earned a European reputation as a reliable and equitable partner within various fields of commerce, such as **Factory Automation, Press Die** and **Plastic Mold** manufacturing industries.

This reputation combined with innovative top quality, one-stop-shop and reliable quick deliveries have made MISUMI Europa GmbH a respected and leading European player within the MTO market of configurable and standardized mechanical components and indirect production materials.

We intend to maintain and further expand this position in the future and to fulfil this obligation, **Code of Conduct of MISUMI Europa GmbH** is enacted to be our ethical and legal compass and guideline.

It contains the basic rules for our employees regarding how to conduct matters at MISUMI Europa GmbH, as well as it projects our ethical and corporate philosophy towards our business partners and to the public.

This Code of Conduct supplements and specifies our corporate principles in a responsible, team-oriented and entrepreneurial manner. In this regard, the Executive Board expects from every employee of MISUMI Europa GmbH to strictly observe and apply these rules. In this way, we want to maintain and expand the reputation of our leading position in the global manufacturing industry among professionals and public at large.

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Frankfurt am Main, December 2025

**Noriaki Murata**  
Managing Director MISUMI Europa GmbH  
President of Europe Business Company

**Arno Schwarz**  
Managing Director MISUMI Europa GmbH

# 2.

# DEFINITION

**This Code of Conduct (the “Code”) shall be defined as a set of fundamental policies and rules that is a model of the processes, activities and conduct of the directors, executives, officers and employees of MISUMI Europa GmbH (the “Company”) from the standpoint of compliance with the relevant laws, regulations and the Company’s policies, rules and corporate ethical standards.**

The Code aims at describing our values and work ethics to our employees to ensure the success of our ongoing and long-term business strategies. In addition, we also target at fulfilling and enhancing our development goals and minimizing the corporate business risks by way of safeguarding the proper conduct of our business according to the outlined principles of this Code, which have been enacted according to our commitment of full compliance with all current legal requirements and internationally accepted business ethics standards.

**Therefore, we expect from all our employees to be in conformity with our core values by way of complying with this Code.**



**3.**

# **MISUMI VALUES**

**3.1 Full Compliance with Law**

**3.2 Equal Treatment and Non-Discrimination**

**3.3 Conflicts of Interest**

**3.4 Company Property**

# 3. MISUMI VALUES

## 3.1 Full Compliance with Law

It is a fundamental principle for us to fully comply with all applicable laws, rules and regulations to fulfill our goal of responsible business conduct.

In this sense we perpetually observe and adhere to the legal necessities.

We also train all our employees and managers about the fundamental laws, regulations, and corporate policies that are relevant to their areas of responsibility to ensure our compliance with law.

## 3.2 Equal Treatment and Non-Discrimination

We have a strong company culture of equal treatment and equal opportunities;

regardless of race, nationality, age, gender, gender identity, religion, marital status, pregnancy, skin color, disability, sexual orientation, political views or any other grounds.

We are committed to provide our current and candidate employees a fair and respectful workplace, which affects all our policies from recruitment to promotion, benefits or developmental programs.

As a result of our **“No Harassment Statement”**, all our employees are regularly trained against harassment to keep our work environment free from any form of sexual abuse, discrimination, racism, bullying, abuse of power, intimidation, threats or any other form of harassment.

With our whistleblowing tool **“Integrity Line”** we provide an independent and anonymous reporting channel for all our employees and business partners, in order to report any harassment cases or other legally prohibited actions.



# 3. MISUMI VALUES



## 3.3 Conflicts of Interest

Conflicts of interest arise due to the conduct of employees for their own account and personal gain, at the expense of the Company's interests.

Our business decisions are made exclusively for the best possible interest of our Company, which sometimes requires keeping our professional and private lives separate. Therefore, all personal activities that may potentially cause risking the interests of the Company shall be strictly avoided by our employees. Corresponding compulsory trainings are offered regularly.

In case of a suspicion for whether a business decision is compliant with law, reporting channels are available for all our employees and business partners with our whistleblowing tool **"Integrity Line"**.

## 3.4 Company Property

Properties, assets and resources of our Company are only used for company business and according to our company policies.

Private use of company properties, assets and resources by our employees, without any explicit permission, is strictly prohibited.



A yellow triangle graphic pointing downwards, containing the number '4.' in white.

**4.**

# **CORPORATE RESPONSIBILITY**

**4.1 Human and Labor Rights**

**4.2 Health and Safety**

**4.3 Sustainability and Climate Protection**

**4.4 Financial Integrity**



# 4. CORPORATE RESPONSIBILITY



## 4.1 Human and Labor Rights

We are bound by the principles of the Universal Declaration of Human Rights and the United Nations' Global Compact.

We also reject all forms of forced and child labor and we have taken all the measures to prevent such working conditions at our Company, which are laid out in our **"Statement against Slavery Human Trafficking"**.

We comply with the national work time regulations and we pay corresponding appropriate compensation for all employees in accordance with national and legal standards, the economic standards of different regions, as well as the personal skills and development of each employee.

We recognize employee unions, their representative bodies and the democratic right of employees to participate in such organizations. Participating or not participating in such organizations does not constitute any discriminative factor in payment or any form of differential treatment for our employees.

**We expect our business partners to also share and commit to these values.**

## 4.2 Health and Safety

We have taken all necessary measures to provide a safe work environment and prevent occupational accidents.

We also train our employees to comply with health and safety regulations.

We expect all our business partners to provide the same level of health and safety standards, meanwhile bearing their standard in mind within the selection process of our business partners and our subcontractors.



# 4. CORPORATE RESPONSIBILITY



## 4.3 Sustainability and Climate Protection

Sustainability and climate protection are key values of resource efficiency of our environment.

Therefore, we put great emphasis on developing our ongoing and future product plans according to the necessities of environmental protection and clean recycling of waste to keep the climate impacts of our production to a minimum.

We have formulated our **“Green Procurement Guidelines”** and have set our objective as avoiding waste and plastic usage by reusing the packaging.

We endeavor and support all our employees to actively cooperate with us to implement and achieve our sustainability and green procurement goals.

## 4.4 Financial Integrity

All our business transactions and financial records are documented properly and transparently according to applicable laws and regulations.

We are fully compliant with tax regulations and corresponding obligations.





**5.**

# **BUSINESS RELATIONS**

**5.1 Business Partners**

**5.2 Prevention of Money Laundering**

**5.3 Anti-Corruption and Anti-Bribery**

**5.4 Fair Competition**

**5.5 Government Relations**

**5.6 Product Quality and Safety**

# 5. BUSINESS RELATIONS



## 5.1 Business Partners

We take our compliance with the legal and ethical standards very seriously.

In order to enable us to fulfilling our compliance goals, we expect from all our business partners (such as customers, clients, suppliers, agents, and consultants) to also adhere to stipulations within this Code.

We carefully check our potential business partners to ensure our due diligence at all times.

At any stage of our collaboration, we reserve our right to stop our business relationship with immediate effect in case we discover that our business partner engages in inappropriate or illegal business practices or is not compliant with this Code.

## 5.2 Prevention of Money Laundering

Our company has been adhering closely to the legal requirements of preventing money laundering.

In the case of doubt, all employees may be requested to inform the Company about unusual financial transactions to the responsible department for reviewing and auditing the transactions.

## 5.3 Anti-Corruption and Anti-Bribery

We are expressly committed to comply with competition law and we actively support the prevention of corruption of any kind.

Any attempt to “justify” the granting or acceptance of personal benefits in individual cases that do not comply with the law is unacceptable.

We do not tolerate offering or accepting any form of bribes, whether to or from public officials or business partners.

Gifts and hospitality are permissible only under strictly defined conditions, which are provided in our “Anti-Corruption Policy” and regularly trained. We expect our business partners to also obey the law.



# 5. BUSINESS RELATIONS



## 5.4 Fair Competition

Sustainable market development requires ensuring fair competition for all the market players.

Therefore, we strictly adhere to all competition and antitrust regulations.

We place great emphasis on fair selection of business partners. We make our decisions based on objective criteria such as quality, price, service, reliability, availability and environmental impact.

We do not tolerate any actions contrary to our commitments that are aimed at preventing cartels and corruptions.

## 5.5 Government Relations

Dealing with government and regulatory authorities and officials, we strictly adhere to business transparency and comply with applicable laws and our policies.

We strictly prohibit our employees to offer any kind of gifts to public officials.

## 5.6 Product Quality and Safety

It is a fundamental principle for us to provide our customers with safe and high-quality products.

For our entire product portfolio, we ensure and continuously enhance our quality standards to reach high level of efficiency in perfect quality. Accordingly, we pursue a program of defect prevention, instead of defect detection to fulfill our zero-defect policy.

We follow all applicable product safety and sustainability standards to ensure the quality and efficiency of our products. In this sense, we control and certify products according to the requirements of several internationally recognized certification systems, such as DIN EN ISO 9001:2015, ISO 14001:2015, AEO and CE, as well as locally binding regulations, such as RoHS Directive (EU Directive 2011/65/EU) and REACH Regulation (Regulation (EC) No. 1907/2006) of the European Union.





6.

# FOREIGN TRADE AND EXPORT

We trade our products and technical know-how in accordance with national and international laws and regulations.

All employees must comply with the foreign trade and customs laws in the cross-border purchase or sale of products.

We declare all imports and exports correctly and transparently to the customs authorities.

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# **7.** **QUALITY**

**7.1 Time Management**

**7.2 Customer Support**

**7.3 Training Policy**

**7.4 Audits**

# 7. QUALITY



## 7.1 Time Management

We see our speed as a competitive advantage for our customers. Therefore, we deliver our products just in time when customers want them.

Our logistics processes have been optimized according to the smooth flow of our deliveries, and we regularly control our delivery chain all around the world to advance the Company even further.

## 7.2 Customer Support

We value the satisfaction of our customers very much. Therefore, we think about what their needs are before they themselves even realize them.

Supplementary services relating to the products are provided before and after the delivery. Moreover, we support our business partners within the development and marketing of their innovative and market-oriented products to reduce the “time to market” range and provide efficiency within the distribution platform.

## 7.3 Training Policy

Qualified employees are an essential resource of our Company.

To ensure the quality of our products, we also provide training programs for our employees with relevant skills, meanwhile ensuring and enhancing their performance and effectiveness.

## 7.4 Audits

We conduct systematic audits to monitor our quality standards according to the new technical and legal requirements to ensure our compliance with internal and external quality requirements.





**8.**

# **CONFIDENTIAL INFORMATION & DATA PROTECTION**

**8.1 Confidential Information**

**8.2 Data Protection**

# 8. CONFIDENTIAL INFORMATION & DATA PROTECTION

## 8.1 Confidential Information

We have taken all necessary steps and implemented measures to ensure that confidential business information of our Company and our Business Partners are protected from the access of unauthorized persons and any other third parties.

## 8.2 Data Protection

We are fully compliant with GDPR and all other legal requirements of data protection.

Collection, processing, usage and transfer of personal data are handled only when permitted by law or by the consent of the person concerned. Unauthorized access to personal data is strictly forbidden and we impose all the measures to adhere the relevant standards.

We also train all our employees regularly to ensure that our data processing activities are conducted and documented in compliance with applicable laws and our internal information security policies.





Your Time,  
Our Priority

9.

IMPRINT



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