



MIPS

CODE OF CONDUCT



1. Introduction

1.1 Directives

The MIPS Code of Conduct outlines the principles and directives we apply doing business. In addition, we also have some basic principles that apply to our general values regarding how we act and behave in relation to customers, suppliers, employees, authorities etc.

MIPS supports the UN (United Nations) Global Compact principles, ILO (International Labor Organization) and OECD (Organization for Economic Co-operation and Development) guidelines.

Local guidelines and policies can, where relevant, be designed based on these common guidelines and policies, to reflect local aspects and local laws. Please see under clause 3, Implementation.

1.2 Applicability of the code

This code applies to all of MIPS' board members, management, employees, suppliers, business partners and sub-contractors.

2. Principles of our Code of Conduct

2.1 Fair business

We shall follow and respect the rule of law in the countries we are operating and do business in. We conduct our business with integrity and honesty and are accountable for our actions. This code sets a minimum of appropriate behavior even if it is a higher standard than local law dictates. If the local law is stricter than the code, local laws must always prevail.

We do not engage in illegal industrial co-operation or cartels. Instead we act in accordance with fair business competition principles, marketing and advertising practices and are committed to continuously developing safety and quality of our products that will stand a fair assessment from our consumers.

We do not accept the offering, request or acceptance of bribes, extortion or money laundering.

We encourage our employees to avoid situations where loyalty to the company may come into conflict with other personal interests.

2.2 Fair employment practices

MIPS shall support and respect protection of international proclaimed human rights and make sure MIPS is not complicit in any human rights abuses.

We respect the rights of the individual and we demonstrate good faith and mutual respect in dealing with employees and their representatives in the workplace.

Freedom of Association

We respect worker's rights to form and join organizations of their choice and to bargain collectively. We expect our suppliers to respect the right to free association and the right to organize and bargain collectively without unlawful interference.

Forced Labor

We will not utilize prison or forced labor in contract relationships in the manufacture and finishing of our products, nor purchase materials from business partners utilizing prison or forced labor.

Child labor

MIPS shall abide by the United Nations Convention on the Rights of the Child (1989), and comply with all relevant national and international laws, regulations and provision applicable in their country of production or operations.

Minimum compensation & remuneration

We shall apply and respect standard local working hours regulated in local law in the countries we are operating in.



We shall ensure that wages paid for a standard working week shall always meet at least the legal/industry minimum standard.

We do not engage in businesses or with suppliers that do not apply the same principles as we do regarding work hours and minimum pay.

Discrimination and harassment

We do not tolerate discrimination or harassment of any kind. All employees in our Group should have the right to work in an environment free from harassment, threats and discrimination. All leaders and managers are responsible for ensuring that these conditions exist.

We do not engage in business with customers or with suppliers, sub-contractors or any other business relationship where discrimination and harassments are tolerated.

MIPS trust and respect that a true ethical business environment is a foundation to build good relationships between our employees and the company.

Sexual harassment, abuses or unwelcome sexual invites are strictly prohibited and will be followed with disciplinary actions and reprimands up to and including dismissal and termination of employment.

Health and Safety and work environment

We will only utilize business partners who provide their workers and employees with a safe and healthy work environment. This also applies to business partners who provide residential facilities for their employees

We are convinced that it is essential to provide a safe, healthy and inspiring work environment for all MIPS employees. All our employees are responsible for maintain this objective.

We do not tolerate use of alcohol, narcotics or misuse of medicines during work. It is strictly forbidden to use, sell, buy, produce, and possess alcohol or narcotics within and around MIPS premises. This includes also driving under the influence of alcohol or narcotics during or in connection to any work related occasion.

We do not tolerate any violence or threat of violence against employees, visitors, customers, suppliers or any others at the workplace. Disciplinary action, which can lead to dismissal and termination of employment, will be taken to those who violate this rule.

We are convinced that companies who support a healthy lifestyle and strive to motivate and empower their staff have better performing employees. Therefore, we encourage our employees to live a balanced and an active life.

2.3 Environment

MIPS strives to support a precautionary approach to environmental challenges.

We want to conduct our business on a long term basis which means that we support long term preserving of a sustainable society and thus integrates environmental considerations into our business planning and decision making. Our business relationships with third party producers and other material suppliers shall comply with local environmental legislation; actively strive to impose as little impact on the environment as possible and work with annual target setting to reduce environmental impact.



We believe that the commitment and passion for doing business in a sustainable way are driven by follow-up on the progress of performance in our environmental focus areas which are:

- Product
- Energy
- Water
- Waste and Recycling
- Responsible Sourcing and Logistics

We believe it is important for continuous improvements to set environmental targets and by monitoring activities in the environmental focus areas.

2.4 Product responsibility

MIPS believe in conducting life cycle assessments on our products, which are designed for durability, long life and safety. This guides us to make environmentally and safety related conscious decisions in design and product development in order to ensure quality of durability, safety and the environmental impact from our products.

MIPS will ensure that its products meet all applicable regulatory requirements and we are committed to offer the market products with the high regard for quality and safety within the frames of our brand values.

2.5 Society and Community

MIPS is committed to open and transparent communication within bounds of commercial confidentiality.

Authorities

We co-operate appropriately with authorities in the countries where we are present and respond upon requests from the authorities in a timely, correct and well documented way.

We do not hide nor fail to disclose information from the authorities that should be reported within the laws and regulations of a nation.

We cooperate and act respectfully against representatives from the authorities if we are being audited in different areas.

Community Engagement

MIPS's activities around community engagement touch many aspects of the business, including the development of employees and a constructive social commitment.

We partner with organizations that look to improve and spread educational information about safety focused on keeping people active and healthy no matter if it is in rehabilitation, carry out a sport or connected to a profession.

We bring this to life at MIPS corporate level, but also at a very local level through our sites and sales offices.

2.6 Dealing with MIPS's property

All inventions or discoveries made by employees in the course of the employment will be the property of MIPS. Copyright, patents or any other intellectual property rights on any work produced by in the course of employment will belong to MIPS.

We are all responsible to protect MIPS's properties, equipment and tangibles against theft, misuse, lose or destruction. We are all responsible to maintain a safe, clean and functioning work environment.

All thefts, misuse and loses must be reported to MIPS via your closest manager, who is responsible for taking the appropriate actions.

We ensure that third party suppliers, consultants and other business partners sign confidentiality clauses and that all their work, tools and other documents are clearly contracted and legally considered as property of MIPS.



3. Implementation

The MIPS Code of Conduct has been defined as clearly as possible, so that the responsibility for adhering to the principles and rules can be understood by each MIPS employee. If, after reading the Code of Conduct, you have any doubts about how to act or behave, you should discuss the issues with your direct manager.

Additional separate policies and the Code of Conduct are aspirational and have been developed exclusively to define our intended approach. They are not intended to be legally binding, to make any representation or warranty or create or extend any guarantees or warranties. Therefore, the Code of Conduct or associated policies are not addressed to any party who may claim that any legal right can be derived from those.

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All employees are obliged to continually update themselves on changes and additions in all our policies and without being requested to so.

It is important that the MIPS Code of Conduct and associated policies are general and overall policies and guidelines for the total MIPS. At each MIPS site there exists local housekeeping rules and policies that needs to be followed and understood by the employees.

4. Compliance

The MIPS Code of Conduct is a resource for all of us and provides us with guidance on how to conduct our business ethically. It also helps protect our reputation and that of our customers, suppliers and other business partners.

Retaliation against anyone reporting a known or suspected ethical compliance concern is strictly prohibited.

Shared Responsibilities

Each of us has a responsibility to act honestly and ethically. Our Code of Conduct provides the framework to put MIPS's values into action. We all have a responsibility to act with integrity, comply with applicable laws and regulations – both in letter and spirit, and honor the MIPS Code of Conduct.

Knowing and complying with our policies

Employees are responsible for knowing, understanding, and complying with our policies and procedures, however, national laws or local collective bargaining agreements always supersede the MIPS Code of Conduct. By committing to these responsibilities, we will continue to meet the expectations of conducting our business with integrity.

Managers' responsibilities

Managers are role models and resources for employees.

**Managers are expected to:**

- embrace the Code of Conduct and act as a role model
- maintain a workplace environment supportive of the Code of Conduct
- educate employees in the meaning and application of the Code of Conduct
- enforce the Code of Conduct

Whistle Blowing Channels Procedure

Reporting known or suspected violations of the Code of Conduct or other misconducts of management, employees and suppliers is a condition of our employment. By reporting these violations, you are helping protect our business, customers, colleagues and others. The employee reporting may remain anonymous if he or she wishes, but it should be noted that remaining anonymous may hinder the investigation into the event or situation in question.

False allegations or misuse of the whistle blowing channel procedure is in itself a violation against the Code of Conduct.

If reporting to the nearest manager is not applicable for whatever reason, you should contact the CEO or CFO for help.

Contact in person, over the phone or through email is appropriate (please see the Contact List in the folder Code of Conduct folder on MIPS Portal). The correspondence should be as clear and detailed as possible to eliminate the chance of misunderstanding and to fully describe the event or situation in question.

Employees, suppliers or any other external business partner can report a suspected violation against the MIPS Code of Conduct via compliance@mipshelmet.com

Investigating reported violations

Investigations will be conducted as quickly and thoroughly as possible and all violations will be reported. We will treat all reports confidentially to the extent possible and limit disclosure to only those who have a need to know. However, we may disclose investigation details to third parties, such as law enforcement or regulatory entities, if we determine it is appropriate to do so under the circumstances.

Täby 2016-08-17

MIPS

Johan Thiel

CEO & President

APPENDIX

Global Compact 10 Principles

Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. Make sure they are not complicit in the human right abuses.

Labor

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. The elimination of all forms of forced and compulsory labor;
5. The effective abolition of child labor; and
6. The elimination of discrimination in respect of employment and occupation.

Environment

7. Businesses should support a precautionary approach to environmental challenges;
8. Undertake initiatives to promote greater environmental responsibility; and
9. Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

10. Businesses should work against corruption in all its form, including extortion and bribery.