Corporate Code of Conduct

Mica Corporation recognizes its responsibilities as a global producer of primers and coatings for the flexible packaging industry, and is committed to being a responsible corporate citizen. Mica abides by both the national laws in each country in which it operates, and conducts its business in accordance with internationally accepted practices and procedures.

Mica believes that these principles, outlined in the Corporate Code of Conduct, extend to all workers producing or providing products or services for Mica, regardless of whether they are employees of Mica. Mica expects its partners, including contractors, their sub-contractors, principal suppliers and licensees to observe these standards when producing or distributing products for Mica or when providing services to Mica.

Legal Compliance
It is the responsibility of all Mica Corporation employees and partners to ensure they operate in compliance with the applicable laws and regulations of the countries in which they operate, as well as internationally accepted practices and procedures, including specific legal requirements related to business conduct, product quality, labor and employment practices, health and safety, and environmental protection.

Business Integrity
Mica Corporation maintains the highest standards for honesty, integrity and fairness in all business practices. Bribes, kickbacks, and unlawful payments are prohibited. Mica Corporation is opposed to making facilitation payments as a matter of policy, and every effort should be made to resist them. Mica Corporation is expected to abide by the national laws in each country in which it operates and internationally accepted practices and procedures in relation to facilitation payments.

Labor Standards
Mica Corporation prohibits the use of child, forced, bonded, and indentured labor, human trafficking and slavery, unsafe and hazardous working conditions and environments, and any behavior that does not maintain human dignity and respect. Mica Corporation employees receive compensation and benefits that comply with applicable laws. In addition, Mica Corporation complies with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked.
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**Health & Safety**
Mica Corporation provides a safe and healthy working environment for employees, contractors and visitors. Mica Corporation prohibits the use of illegal weapons, harassment in the workplace, and the use or possession of drugs, alcohol and other controlled substances in the workplace.

**Equal Employment**
Mica Corporation values diversity and inclusiveness, and prohibits discrimination on the basis of race, ethnicity, national origin, disability, marital or maternity status, religious or political beliefs, age, gender identity, sexual orientation, or any other characteristic protected by law.

**Product Quality**
Mica Corporation does everything in its power to provide goods and services that consistently meet required specifications and customers’ needs, perform as intended, and are safe for the intended use.

**Conflict of Interest**
Mica Corporation avoids all transactions or relationships that are or appear to be in conflict of interest. Mica Corporation employees may not accept gifts from persons or entities that deal with the Company if the gift is more than modest in value, or if acceptance of the gift could create the appearance of a conflict of interest.

**Intellectual Property**
Mica Corporation’s employees and partners are responsible for ensuring that Mica’s intellectual property rights are protected. At no time, should Mica’s intellectual property rights be infringed.

**Confidentiality**
Mica Corporation’s employees and partners must ensure that confidential information is preserved and protected, and not disclosed to unauthorized parties.

**Environment**
Mica Corporation manages its operations in an environmentally responsible manner and complies with related laws and regulations applicable in the country where products or services are manufactured or delivered.
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Community
Mica Corporation strives to be a trusted corporate citizen and to operate in a manner that encourages lasting, beneficial and interactive relationships with the communities in which it operates.

Compliance
Mica Corporation expects all employees and partners to alert Mica’s leadership team if a situation develops that requires anyone to operate in violation of the codes set forth in this document. Mica reserves the right to verify compliance with the code through audits or other means. Should Mica find that an individual employee or partner company does not comply with the code, Mica reserves the right to demand corrective measures and/or terminate its business relationship and related contracts with that party.