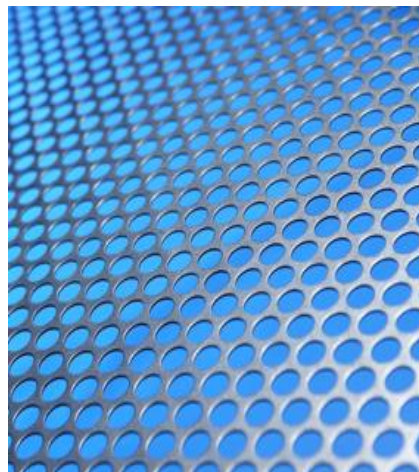


RMIG Code of Conduct



Introduction

The RMIG Group (RMIG) is a leading and well-equipped Group in the field of perforation technologies, forming technologies, surface treatment and the assembly of components. The company specialises in the development, production and assembly of complex perforated metal parts, complete units for the automotive industry and metal sheet handling. Metal technology competence, expert customer service, innovation and quality awareness are distinguishing features of RMIG.

We wish to succeed by fair competition as well as by ethically correct behaviour and lawful conduct. A solid business collaboration to the benefit of all can only exist on the basis of fair competition and the strict compliance with the legal system. At RMIG, all interaction and cooperation between colleagues as well as towards our external partners are characterised by security, trust, reliability and honesty. In order to keep winning the trust and confidence of our customers, employees and the public, it is essential to respect justice and law and comply with our internal regulations.

As we are aware of our responsibilities towards our customers, employees and organisations, we define ethical, social and legal guidelines and principles for a successful business collaboration by this RMIG Code of Conduct. Thus, this RMIG Code of Conduct defines the general principles and requirements for RMIG employees.

Apart from procedural, economic and technical factors, social and ecological aspects such as human rights, working conditions, prevention of corruption and environmental protection are particularly important to us.

RMIG expects all employees to comply with current laws and this RMIG Code of Conduct, thus sharing our ethical principles.

1 Compliance with laws

RMIG is obliged to comply with all laws applicable to our company.

2 Human rights and workers' rights

2.1 Interaction, respect and trust

We respect the personal dignity, privacy and personal rights of all individuals. In accordance with our corporate values, we are committed to showing respect, honesty and trust towards our employees and external partners. Interacting with one another, we value a fair, friendly and constructive behaviour. Hence harassment and sexism are not compatible with employment at RMIG.

2.2 Equality and non-discrimination

We live in a culture of equal opportunity and the same appreciation applies to all employees. Concerning all employment decisions, employees are strictly and solely treated according to their abilities and qualifications. We do not tolerate discrimination with regard to ethnic origin, culture, sex, religion, ideology, disability, age or sexual identity under any circumstances.

2.3 Child labour

Any form of child labour is strictly prohibited. If local laws do not define a higher age limit, no children still subject to compulsory education or under the age of fifteen shall be employed.

2.4 Work safety

RMIG shall ensure a safe and ergonomic working environment and is responsible for taking preventive measures concerning occupational health and safety. Current occupational health and safety requirements shall be met. A working environment promoting health shall be created, while accidents and occupational diseases are to be avoided.

2.5 Remuneration and working hours

Adequate remuneration as well as statutory minimum wages are ensured and the respectively existing national legislation concerning working hours is observed.

2.6 Forced labour

RMIG prohibits and prevents all forms of forced labour and ensures that no one is employed against their wishes.

3 Business integrity

3.1 Bribery and corruption

Free and fair competition is the foundation of economic activities. Corruption, disloyalty and betrayal distort this competition. In particular, we expect our employees to refrain from offering, promising or permitting any benefits to employees of customers, suppliers or third parties affiliated with them, with the objective of receiving an order or any other kind of preferential treatment within the company. Contributions of any kind offered to employees of a customer or supplier or to any officials or employees of other companies, aiming to gain orders or other unfair advantages for RMIG or other persons including oneself, are thus not acceptable.

3.2 Presents and invitations

Our business relationships are based on honesty and shall not be distorted or influenced by means of bribery or other measures.

Invitations, presents or hospitality offered by RMIG employees are to be rightful and legitimate.

3.3 Identification of concerns

RMIG employees are obligated to notify Group Management immediately upon learning of any known or suspected improper behaviour by suppliers or subcontractors, or by colleagues within RMIG.

3.4 Free competition

RMIG is obligated to comply with all current regulations concerning fair competition and antitrust laws. RMIG shall not violate those antitrust laws by agreements concerning, for example, price collusion, allocation of markets and customers, market agreements or bid rigging, and shall not abusively take advantage of an existing market-dominating position.

3.5 Money laundering

RMIG must comply with all relevant legal obligations concerning money laundering prevention and shall not be involved in money laundering activities.

4 Handling of information

RMIG must comply with current data protection laws and regulations. Personal data of customers, consumers and employees are to be handled confidentially. RMIG shall protect confidential information and

only use them in an appropriate manner. RMIG is not entitled to disclose information which is unknown to the public.

5 Environmental protection

RMIG must comply with all current environmental laws and regulations, develop measures to minimise environmental pollution and continuously improve environmental protection. Furthermore, RMIG is expected to establish and implement an appropriate environmental management system.

6 Conflict minerals

RMIG is responsible for taking measures to prevent the usage of products which directly or indirectly finance armed groups or violate human rights. Should a product contain one or more of said conflict minerals (tin, tantalum, tungsten, gold or the according ores), RMIG must guarantee transparency regarding the entire supply chain to the smelting works upon request.

7 Supply chain

RMIG expects its employees to forward our Supplier Code of Conduct and all its principles and requirements to their suppliers and subcontractors, and that it is to be used as a selection criterion. *(A copy of the Supplier Code of Conduct can be found on the intranet).*

8 Failure to comply

Any violation of the obligations outlined in this RMIG Code of Conduct will be considered a fundamental breach of contract. If any suspicion of failure to comply with the principles should arise, RMIG reserves the right to request further information concerning the respective situation. Should improvement measures not be implemented within a given deadline or should this RMIG Code of Conduct not be met, RMIG reserves the right to terminate employment.