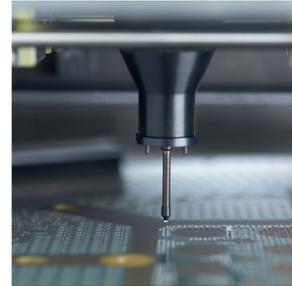




FEINMETALL
Contact Technologies



CODE OF CONDUCT

Feinmetall GmbH



Preamble

Dear suppliers,
dear distributors,
dear business partners,

Feinmetall stands for safety, reliability and quality.

To ensure this, we must identify and avoid risks and sources of error in advance, also in connection with our context and in compliance with laws.

This Code of Conduct is of central importance for us, but also for our business partners such as suppliers, distributors, etc. It provides us with a committed framework of orientation and represents an essential part of our corporate culture.

We all have to know and respect the contents without giving up our own responsible actions.

We expect impeccable behavior towards the company, colleagues and third parties.

Contact persons for questions regarding the Code of Conduct are our employees in purchasing or sales. The current Code of Conduct is available on the Internet at www.feinmetall.de.

Dr. Peter Geiselhart
CEO Feinmetall GmbH



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1 Basic Principles

1.1 Values and rules of conduct

The basis for our actions within the company and against third parties is based on general values such as honesty, openness, trust and mutual respect.

We accept social responsibility and act in accordance with international human rights. We reject any form of child labor or forced labor and respect national and international employment rights.

We respect and protect the personal dignity of every individual. We do not tolerate discrimination or harassment of our employees, business partners or third parties. We do not tolerate sexual harassment, corporal punishment, coercion or verbal attacks, nor any intimidating or insulting behavior.

We want all employees and business partners to be accountable to each other and to third parties.

1.2 Compliance

Legal violations can cause great damage to the company and the individual employee or business partner.

Compliance with the law and the law in our company therefore has top priority.

Every business partner and employee is obliged to observe the legal regulations. In the event of a violation of the law, other regulations or internal rules, appropriate consequences must be expected.



2 Conflicts of interest

We respect the personal interests and private lives of our business partners and employees. However, we attach importance to avoiding conflicts between private and business interests or even the appearance of such conflicts. It is therefore important to identify and avoid situations in time, which could lead to a conflict between personal interests and the interests of Feinmetall or its business partners.

2.1 Gifts and invitations

Demanding or accepting activities or personal advantages in connection with official duties from an employee of another company, from a public administration employee or from any other third party is prohibited.

The same applies to Feinmetall employees who grant gifts and other advantages if this could lead to a conflict of interest for the recipient or themselves. It is prohibited to offer gifts or other benefits to public officials and other officials. This does not include gestures of courtesy, which are permitted under the laws of the respective country.

2.2 Export control and customs regulations

We comply with the export control and customs regulations of the countries in which we do business. Business partners and employees involved in the import, export or transfer of goods, services, hardware, software or technology are obliged to comply with all applicable sanction programs, export control and customs laws and regulations.

2.3 Competition and antitrust law

The rules of fair competition must be observed by every business partner and employee. The exchange of information among competitors on prices, the segmentation of territory or customer groups, information on supply relationships and their conditions as well as on supply behavior and supply capacities is not permitted. Any specifications or agreements made by business partners or employees that are inadmissible under antitrust law are not permitted.



3 Handling of information, data and company property

3.1 Company property

We treat Feinmetall's plant equipment and working materials properly and with care, protect them from loss, theft, damage or misuse and use them only for Feinmetall's corporate purposes.

3.2 Right to information

In order to optimally fulfill their tasks, every business partner and employee has the right to receive complete and authentic oral, written, internal or external information. Therefore, business partners and employees must ensure a secure and prompt flow of information within the company and to business partners. Information must be documented, filed, stored and archived in such a way that it is possible to find the relevant information within a reasonable time.

3.3 Notes and reports

The documentation of all business transactions must comply fully with the legal requirements and the usual standards at Feinmetall. Notes and reports (internal and external) must be correct and truthful. Publication on behalf of Feinmetall and use of the name by third parties must be authorized in advance by the responsible office.

3.4 Confidentiality

Each of us is obliged to keep business and company secrets and other non-public information secret. This includes details of the organization, business, production, research and development processes or company figures. The confidentiality only becomes invalid if the disclosure or use of this information has been expressly permitted.

The obligation to maintain confidentiality shall also apply after termination of the employment or business relationship.



3.5 Data protection and data security

The protection of personal data (employees, customers, suppliers) has high priority. The regulations on data protection and data security must be observed.

The collection, processing or use of personal data is only permitted if this is legally permissible or the person concerned has given his or her consent.

The Internet is a working tool. No information may be accessed or passed on that violates laws or internal rules. This includes, in particular, information that incites racial hatred, discrimination, acts of violence or other criminal activities or that represents such topics.

4 Donations

Donations are only permitted if they do not give the impression of any influence on the part of the company.

5 Safety at work

By strictly following all safety regulations and carefully observing the working environment, all business partners and employees are required to ensure a safe and healthy working environment.

6 Environmental protection

Protection of our environment is an integral part of Feinmetall's corporate mission statement. Our aim is to minimize environmental pollution and thus continuously improve our contribution to environmental protection.

To achieve this, we use technology that is more efficient, consumes less and is available to everyone. In our own actions, too, everyone is obliged to reduce the impact on the environment and to limit possible pollution to an acceptable minimum.

7 Implementation and sustainability

The Code of Conduct is mandatory for all business partners and employees of Feinmetall. It is electronically accessible to all business partners and employees via the Feinmetall homepage.