

Code of Conduct for Klinger Ltd

This Code of Conduct defines the basic requirements placed on Klinger Ltd employees and suppliers concerning their responsibilities towards their stakeholders and the environment. Klinger Ltd reserves the right to reasonably change the requirements of this Code of Conduct resulting from changes in the Klinger Ltd Compliance Program. In such event Klinger Ltd expects all employees and suppliers to accept such reasonable changes.

Klinger Ltd expects all employees and suppliers to adhere to the following code of conduct:

Legal compliance

to comply with the laws of the applicable legal system(s).

Prohibition of corruption and bribery

to tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.

Respect for the basic human rights of employees

to promote equal opportunities for and treatment of its employees irrespective of skin colour, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;

to respect the personal dignity, privacy and rights of each individual; o to refuse to employ or make anyone work against his or her will;

to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;

to prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;

to provide fair remuneration and to guarantee the applicable national statutory minimum wage; o to comply with the maximum number of working hours laid down in the applicable laws; o to recognize, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organizations or trade unions.

Prohibition of child labour

not to employ workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, not to employ workers under the age of 14.

Health and safety of employees

to take responsibility for the health and safety of all employees;

to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;

to provide training and ensure that employees are educated in health and safety issues; o to set up or use a reasonable occupational health & safety management system.

Environmental protection

to act in accordance with the applicable statutory and international standards regarding environmental protection;

to minimize environmental pollution and make continuous improvements in environmental protection;

to set up or use a reasonable environmental management system.

Supply chain

to use reasonable efforts to promote among its supplier's compliance with this Code of Conduct;

to comply with the principles of non-discrimination with regard to supplier selection and treatment.

Conflict Minerals

We are committed to legal and ethical compliance in all our business practices. We also support the goal of ending the violence and human rights violations associated with the mining of the defined conflict minerals gold, tin, tantalum and tungsten. In support of our commitment to ethical business practices and to comply with international legislation and SEC rules, we will conduct due diligence within our supply chain to identify the source of any Conflict Minerals in materials, parts and components we procure to manufacture our products. Further, we expect our suppliers to adhere to the same principles with respect to their sourcing and supply chains.