

As a leading international manufacturer of Springs and Stampings, BAUMANN is committed to maintain the highest ethical standards in its relationships with employees, customers, suppliers, shareholders, competitors, governments, communities and to the environment. Therefore all employees and all suppliers of goods and services to the BAUMANN Group are obligated to comply with the laws of the applicable legal system(s) in general and with the following rules and standards in particular:

#### BASIC HUMAN RIGHTS

to promote equal opportunities for and treatment of its employees respective of skin color, 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;  
to refuse to employ or make anyone work against his 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;  
to comply with the maximum number of working hours laid down in the applicable laws;  
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

to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14

#### 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.

#### HEALTH AND SAFETY OF EMPLOYEES

to take responsibility for the health and safety of its 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;  
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 suppliers compliance with this Code of Conduct;  
to comply with the principles of non discrimination with regard to supplier selection and treatment.

#### WHISTLE BLOWING

to immediately report any potential violations to the line manager;  
never to punish or reprimand anyone who reports these kinds of breaches or violations in good faith.

BAUMANN expects its line managers to escalate and report any violations of laws, rules, regulations, policies, professional standards and the principles of the Code.

It is obligatory for all employees and suppliers of the BAUMANN Group to comply with this Code of Conduct. Failure to do so will not be tolerated by the company and may result in legal measures being taken.

BAUMANN reserves the right to reasonably change the requirements of this Code of Conduct. In such event BAUMANN expects its employees and suppliers to accept such changes.