

NIEDAX GROUP - Code of Conduct -

Version 1.0

**Binding Corporate Social Responsibility Policy
for the Companies in the NIEDAX GROUP**

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Preamble

The NIEDAX GROUP is a corporate group comprising established companies operating as independent legal entities, which are among the leading international manufacturers in the electrical and cable support systems sector.

In the light of future challenges on what is a global market, the companies of the NIEDAX GROUP are seeking to grow further, both organically and through acquisitions. Their goal is to become the global market leader in the cable support system segment.

Fair, ethical conduct in full compliance with statutory requirements will lead to the success that NIEDAX is seeking. The companies in the NIEDAX GROUP therefore undertake to meet their corporate social responsibility (CSR) in all areas of their global operations, on the basis of the "ZVEI [German Electrical and Electronic Manufacturers' Association] Code of Conduct".

This "NIEDAX GROUP Code of Conduct" (hereinafter referred to as the "Code of Conduct") sets out in particular what CSR means in terms of working conditions, social and environmental responsibility, transparency, fair and open partnership, and dialogue. The contents of this Code of Conduct, which has been developed for and adapted to the companies in the NIEDAX GROUP, are an expression of the common values shared by all in NIEDAX GROUP as defined in the Group vision and mission.

1. The fundamental principles of corporate social responsibility

This Code of Conduct is based on a common understanding of the fundamental principles of corporate social responsibility. Each company that signs is therefore committing to taking responsibility by considering the economic, technological, social and ecological implications of its business decisions, and to seeking to ensure a reasonable balance between the interests at stake.

The undersigned company shall, as far as possible and within the scope available to it, proactively contribute to the good and the sustainable development of the global Group at all sites at which that company operates. Each company shall be guided by universal ethical values and principles, in particular by integrity, honesty and respect for human dignity.

2. Scope

This Code of Conduct applies to all branches, subsidiaries and business units of the undersigned company, both in Germany and abroad.

2.1. Key aspects of corporate social responsibility

The values and principles set out below shall be considered and respected at all times.

3. Key aspects of corporate social responsibility

3.1. Compliance with the law

The undersigned company shall comply with all applicable laws and other statutory regulations in the countries in which it operates.

In countries with a weak institutional legal framework, the company shall carefully examine which aspects of good corporate practice from Germany should also be applied to promote corporate responsibility.

3.2. Integrity and principles of corporate responsibility

The undersigned company shall be guided by universal ethical values and principles in all its actions, and in particular by integrity, honesty, respect for

human dignity and openness, and shall not discriminate on the grounds of religion, ideology, gender or ethnicity.

The undersigned company is committed to fighting corruption and bribery. It shall engage in all appropriate measures to promote transparency, fair and honest practice, responsible leadership and checks and balances within its business.

The undersigned company shall pursue honest and accepted business practices and shall ensure fair competition. It shall focus on professionalism and the quality of work in order to succeed on the market. It shall be transparent and cooperative in all dealings with supervisory and regulatory bodies.

3.3. Consumer interests

Wherever consumer interests are at stake, the undersigned company shall comply with all consumer protection provisions and shall ensure that the sales, marketing and information practices employed are appropriate. It shall exercise particular care where vulnerable groups such as children and young adults are involved.

3.4. Communication

In an exchange with staff, clients, suppliers and other stakeholders and target groups, the undersigned company shall clearly communicate the requirements of this Code of Conduct and their implementation, and encourage dialogue on this matter. All files and documents shall be correctly drawn up and appropriately stored, and shall not be unlawfully or inappropriately modified or destroyed. Any and all trade secrets and commercial information of partners shall be treated as sensitive and confidential.

3.5. Human rights

The undersigned company is committed to human rights. It shall in particular respect the following human rights:

3.5.1. Privacy

Protection of privacy.

3.5.2. Health and safety

Health and safety at work, in particular by ensuring a safe and healthy working environment, to prevent accidents and injury.

3.5.3. Harassment

Protecting staff from physical punishment and from physical, sexual, psychological and verbal harassment and abuse.

3.5.4. Freedom of speech

Protecting and granting the right to free speech and freedom of expression.

3.6. Working conditions

The undersigned company shall comply with the following basic employment standards:

3.6.1. Child labour

The ban on child labour, i.e. on employing persons under the age of 15, or under any higher minimum age set by local statutory regulations, unless exceptions are admissible under law.

3.6.2. Forced labour

The ban on all forms of forced labour.

3.6.3. Remuneration

Employment standards governing pay, in particular the level of pay in accordance with applicable laws and regulations.

3.6.4. Employee rights

Respect for the rights of the employee to freedom of association, freedom of assembly and collective bargaining and wage negotiations, if and to the extent that this is lawful and possible in the country in question.

3.6.5. Ban on discrimination

The fair and equal treatment of all employees.

3.7. Working hours

The undersigned company shall comply with employment regulations as regards maximum working hours.

3.8. Environmental protection

The undersigned company shall meet all environmental protection provisions and standards applicable to its sites, and shall act in accordance with its environmental responsibility at all sites. It shall use natural resources responsibly.

3.9. Social responsibility

The undersigned company shall contribute to the social and economic development of the country and region in which it operates, and shall support and promote corresponding voluntary activities by its employees.

4. Implementation and compliance

The undersigned company shall take all appropriate and reasonable measures to implement and apply the principle and values set out in this Code of Conduct at all times.

Contractual partners may, on request and on the basis of a reciprocal agreement, be provided with information on the main measures employed to demonstrate broadly how compliance with the Code of Conduct is being ensured. This shall not give them the right to require business or trade secrets, competition information or other sensitive data.

Linz am Rhein, 22 November 2013

On behalf of the companies of the NIEDAX GROUP:

Bruno Reufels

Alexander Horn

Rolf Luthardt

Chair of the Executive Board

Director

Director

**Undertaking
to comply with the binding
corporate social responsibility policy
of the NIEDAX GROUP (Code of Conduct)**

On behalf of:

(Company)

I, the undersigned

(Surname and first name)

hereby declare in my capacity as

(Position in the company)

and as a representative of

(Full company name incl. legal form)

registered at the following business address

(Street)

(Town/city and postcode)

(Country)

(Other address/delivery information)

that I have read and understood the "NIEDAX GROUP Code of Conduct - Undertaking to comply with the binding corporate social responsibility policy of the NIEDAX GROUP (Code of Conduct)", Version 1.0, and hereby undertake to comply with all provisions detailed therein.

(Country and town/city)

Date

(Signature)

Company seal: