

Statement by the management on the status of the Code of Conduct

Dear Colleagues,

Financial success and social commitment are aims of our company that cannot be separated. Responsible, ethical conduct towards employees, business partners, third parties and the environment is therefore an integral part of our value system, which is reflected in our Hilite corporate values. The Hilite Code of Conduct now contains more precise information.

The Code of Conduct serves as a common guideline for our decisions and actions. It describes the binding minimum standards for responsible conduct towards business partners and the public as well as for our behaviour within the company. By making people aware of legal risks, it will help to avoid breaches of the law. We must all commit to observing the principles set out in this code. This code is binding for Hilite International as well as for all companies affiliated with Hilite or controlled by it.

It goes without saying that we observe laws and regulations when acting on behalf of the company. Any breach of such laws and regulations not only conflicts with our values but also damages our reputation and may have considerable legal consequences for the company and the individual employee concerned.

Anybody who acts illegally or enriches themselves at the company's expense is harming the company, its shareholders and its employees. Any such behaviour reduces the financial success of the company, impairs its ability to invest and grow and ultimately can put jobs at risk.

With regard to the Code of Conduct, we would like to emphasise three points.

- Nothing can replace personal integrity and sound judgement. To do justice to our social commitment, it is important that we are all aware of the laws and regulations applying to our particular sphere of work and that we take personal responsibility for adhering to them.
- Managers bear a special responsibility to set a good example. Embodying our values, embracing our corporate culture and cracking down on any business activities that are not in line with the law or meet the principles of our company, all of this forms part of every manager's responsibilities at Hilite.
- The company and its managers also bear responsibility for creating an environment in which subjects can be openly discussed without fear of reprisals. This applies in particular to breaches of this Code of Conduct. Anyone who notices such a breach should be able to approach a person in his or her direct working environment in confidence. If this is not possible or advisable in a particular situation, employees can always seek advice from other points of contact. These contact persons are also introduced in this code.



Code of Conduct

The continuing growth and success of our company depends heavily on our joint commitment to social responsibility and to maintaining our good reputation as a trustworthy business partner. I thank you for making your contribution towards attaining this goal through the integrity of your personal actions.

David Wei

CEO

Statement by the management on the status of the Code of Conduct

Observing the law	4
1. General requirement	5
Mutual trust & respect	5
No reprisals	5
Conflicts of interest	6
Accounts, financial integrity & combating money-laundering	6
Imports, exports and customs provisions	7
Boycotts	8
Relationships with official bodies & authorities	8
Dealings with business partners and third parties	8
Combating corruption	8
Gifts & invitations	9
Fair competition	9
Product safety	10
Protection of intellectual property & confidential information	10
Insider information	11
Data protection	12
Statements on products and services	12
Use & security of information technology	12
Protection of company assets & combating fraud	13
PR work & social media	13
Job security	14
Human and the environment	14
2. Decision-making aids	15
3. Resources	15

OBSERVING THE LAW

We observe all local, national and international laws and regulations wherever we operate.

The observance of all laws and regulations is of crucial importance for the success of our company worldwide. Breaches of laws and provisions can have serious consequences for the company but also for each individual, such as a criminal conviction, fines and the loss of our reputation.

All managers at Hilite are obliged to know the basic laws, regulations and company guidelines relevant to their area of expertise. Thorough knowledge of the law and of company guidelines is important, especially for managers who bear particular responsibility for meeting compliance guidelines due to their particular function or assigned position (e.g. managing directors, managers in the Finance, Human Resources and Risk Management Departments).

Stricter rules than those described in this Code of Conduct may apply in certain countries, sectors or markets and in dealings with certain business partners. In such cases, the stricter standard applies.

This Code of Conduct is binding for Hilite International as well as for all companies affiliated with Hilite or controlled by it. It applies to the entire Hilite workforce including management, senior executives and every single employee. This Code of Conduct prescribes certain, binding guidelines in situations in which employees should pay particular attention to acting responsibly. The Code of Conduct refers at times to more extensive guidelines, which it complements. The current versions of this Code of Conduct and all company guidelines can be viewed on the intranet at any time.

Hilite does not tolerate any breaches of this Code of Conduct. Anyone breaching the Code of Conduct must be aware of the consequences. These will depend on the severity of the breach. The consequences range from disciplinary action (e.g. written warning or dismissal), via civil actions for damages to criminal prosecution. Depending on the severity of the violation, even the suspicion of a violation can lead to termination without notice if there are sufficient grounds for suspicion.

In the event of doubt about the lawfulness of a decision, an appropriate person, specified in the "Resources" section, should be contacted in order to obtain advice and clarity.

1. General requirements

Mutual trust & respect

We treat each other with respect and trust and endeavour to create a working environment that does not tolerate discrimination.

Every individual has the right to be treated justly, respectfully and with dignity. We are committed to the principle of equal opportunities and we foster a respectful, diversified working environment in which the individual value of every single person is recognised, and everyone is treated with politeness, honesty and dignity. Harassment, mobbing and intimidation are not permitted. Unwelcome, offensive conduct of a sexual nature or based on an employee's protected characteristics constitutes harassment. Mobbing is repeated intimidating behaviour that takes place at the workplace or as part of a professional activity. Mobbing can include humiliating, insulting, intimidating or isolating other persons.

As a multinational company, we are committed to the ILO Declaration of Principles (ILO: International Labour Organization from United Nations) and orient our wages and social benefits to those of comparable companies in the relevant country and to the labor agreements that prevail there.

All decisions with respect to staff recruitment, appointments, disciplinary measures and promotions as well as other working conditions are based solely on the knowledge and experience of the employee and are free of discrimination. We do not tolerate any discrimination of employees or applicants on the basis of nationality or ethnic origin, appearance, gender, pregnancy, marital status, age, disability, religion or ideology, sexual orientation or other grounds listed in the latest non-discrimination legislation or the company's guidelines.

Example:

Some colleagues continually make fun of an employee's accent at work. The comments become increasingly mean, and the colleague perceives it as a personal attack.

At Hilite, we do not tolerate any discrimination and we champion respectful treatment of each other. Should you notice that individual employees are being excluded and personally attacked, talk to the person concerned. If this person agrees, try to influence your colleagues. If this does not help, please turn to an office listed under "contacts".

No reprisals

We encourage our employees to talk freely and without fear of reprisals. Reprisals against employees, who express concerns in good faith with regard to misconduct occurring in the company, are not permitted. The opportunity to talk freely helps to avoid, detect and remedy misconduct, should it occur.

We therefore provide an open working climate in which employees are able to approach their superiors or managers to address problems or express criticism without reservations. The managers are responsible for encouraging an open dialogue, supporting their staff and treating their concerns fairly and objectively.

Intimidation attempts or reprisals against employees, who report suspected or actual misconduct in good faith, may not be tolerated. Reporting misconduct “in good faith” means that somebody believes on the basis of facts that their portrayal is truthful regardless of whether this is confirmed by a later investigation or not.

If an employee finds it difficult to express concerns directly to their superior or another person on site, or attempts to do so are not productive, we will encourage them to use the resources specified in the “Resources” section.

Conflicts of interest

We disclose possible or actual conflicts of interest at the work place in good time to ensure that they can be investigated and solved. We also avoid any semblance of a conflict of interest or bias.

In our everyday business lives, we may be confronted with situations in which a decision in the best interests of the company conflicts with our personal interests. A conflict of interest can make it harder for an individual to take objective decisions in the company’s interests. Such conflicts of interest can occur, for example, in private investments in business partners or competitive companies or in personal relationships with colleagues, applicants or employees of business partners.

Employees, who find themselves in an actual or possible conflict of interest, must disclose it to their superior or the management to enable it to be quickly solved. In any cases of doubt, please use the resources specified in the “Resources” section.

Accounts, financial integrity & combating money laundering

We conduct our business activities and prepare documentation and financial reports with integrity and transparency. Only if all the documentation in our company is correct, can we possess reliable information and observe the law. The documentation includes all physical and electronic documents, which we create as part of our professional activity. We therefore always ensure that information supplied by us is open and correct. We are aware that we are never entitled to portray data misleadingly, distort or change them.

All transactions and records with respect to our business activities must be conducted and kept precisely and correctly. All transactions, assets and liabilities must be properly documented and recorded in compliance with the guidelines for financial reporting and the statutory requirements in place. We prepare the appropriate documentation on time in order to guarantee correct portrayal.

We monitor risks and implement suitable measures and steps in order to handle them.

The highest level of precision, completeness and responsibility in all business matters is indispensable for maintaining the accuracy of the documentation.

The financial accounts, documents, contracts and other company information must not contain knowingly erroneous or misleading entries. Manipulation of the balance sheet is forbidden. If we notice a mistake, we report it to the responsible department or another office specified in the “Resources” section.

We observe all laws on money laundering and endeavour to only maintain business relationships with respectable business partners and to only use funds of legitimate origin. We therefore carefully check the identity of our business partners. The requirements for financial integrity specified above must be observed in order to prevent money laundering. In particular, incoming payments must be allocated to the corresponding services and posted without delay.

Example:

You use your private car to drive to a meeting outside the office. Subsequently, you prepare your expenses claim and think about exaggerating your mileage somewhat.

However, our documents must be correct and must not contain any falsified information. Stating a higher mileage, even if it is only a small discrepancy, would falsify the documentation and mean that the details are no longer correct. However, all employees are obliged to ensure that all documents are correct.

Imports, exports and customs provisions

As a globally active company, we are obliged to observe and follow the relevant laws and directives of all countries in which we operate. Imports, exports and domestic trade with goods, technologies, services, our handling of certain products as well as the movement of capital and payment transactions are governed by national and international laws. Suitable procedures must ensure that neither these laws nor current economic embargoes, trade regulations, import and export controls nor provisions to prevent the funding of terrorism are breached as a result of transactions with third parties.

In the course of our business activities, transactions and communications, we must check whether any particular activity entails the importation or exportation of data, services or products from or to one or more countries, which are subject to trade controls. In addition, we must disclose all parties to the transaction in unambiguous form. To ensure that all the definitive regulations are adhered to, we have every import or export transaction reviewed by the responsible experts.

In addition, we combat smuggling and therefore adhere to the relevant customs provisions in all import and export transactions.

Boycotts

We do not participate in illegal calls for boycotts on behalf of the relevant countries in which Hilite operates.

According to US law, US companies are not allowed to refuse to transact with another person or company or take any other action to support a boycott not approved by the US government.

Relationships with official bodies & authorities

Relationships with official bodies are frequently subject to particularly strict requirements. Contact with authorities and state employees can occur in daily business life (receipt of licences or approvals or contracts concluded), when engaging in lobbying work or responding to official enquiries or investigations of any kind (e.g. summonses, official investigations, legal

disputes). We maintain correct and legally irreproachable relationships with all official bodies and authorities. In all our relationships with government bodies and regulatory authorities and their representatives, we always conduct ourselves in an upright and transparent manner, and act in compliance with current legislation.

Employees, who receive official enquiries of any kind, should contact their superiors without delay to receive support before taking any further steps, thereby ensuring that all statutory requirements are complied with. In any cases of doubt, please use the contact persons specified in the “Resources” section.

Dealings with business partners and third parties

In our relationships with others, we conduct ourselves with integrity and expect our business partners to comply with the law at all times and in all countries, as well as to respect ethical values and act in a sustainable fashion.

Our business partners (e.g. customers, suppliers, representatives and advisors) expect to be able to rely on our company as a business partner that acts within the law. This includes confidence in the integrity of our procurement and acquisition procedures. We must also be familiar with our contractual obligations towards our business partners.

We, too, take care to ensure that the business practices of our partners comply with the law.

Combating corruption

We condemn all forms of corruption and bribery and comply with all pertinent legislation for fighting corruption. At Hilite, it is forbidden to offer, promise, authorise or accept bribes or other inducements in any form to or from a person in the public or private sector. “Bribery” includes all monetary gifts of any kind, such as money, gifts, travel expenses, personal gratifications or invitations. The material value of the gift is not decisive in this context. “Facilitating payments” are also to be classified as bribery. These are small payments, usually paid in cash, which are typically given to state employees in order to speed up or guarantee a routine action that the civil servant is in any case obliged to perform. Even if such payments may be customary in some cases, they are usually illegal and constitute a criminal offence. For this reason, public officials should not be offered any gifts as a matter of principle.

Gifts & invitations

Gifts and invitations from or to customers, suppliers or other business partners may never be used to obtain or exercise inadmissible advantages or potential influence or even to allow the impression of an advantage or potential influence to be gained.

Appropriate, moderate entertainment as well as advertising measures or other business gifts or invitations serving to maintain good relations or to present products or services, may be seen as an admissible part of business activity. However, any such gifts may only be granted or accepted if they serve a justified business purpose and not to obtain or grant an unlawful advantage. The gift may not have any inappropriately high value and must neither exceed the limits of normal business activity nor the recipient's normal standard of living. Any gifts must be granted or accepted in a transparent fashion to avoid the appearance of secrecy. Care must also be taken to ensure that the acceptance or granting of gifts or invitations is not dependent on a return favour or that the impression is created that the gift is dependent on a return favour.

If sponsorship or a "contribution for a good cause" is solicited or offered, care should be taken to ensure that this does not constitute a hidden attempt to gain influence.

You can take further details (in particular on value thresholds, etc.) from the current guideline outlining how to deal with gifts and invitations. In any cases of doubt, please also use the resources specified in the "Resources" section.

Example:

As part of an ongoing business relationship with a supplier, there are regular personal meetings between the relevant contacts even when they change. During these meetings, both sides invite the other to a subsequent lunch at which work-related topics are discussed.

Such invitations are permissible as part of the business relationship. This may change, however, if negotiations on extending contracts or other important decisions are on the agenda. In this case, invitations should be neither issued nor accepted to avoid even the appearance of an inducement. If you are uncertain in this regard, please ask your superior or one of the bodies specified in the "Resources" section.

Fair competition

We observe the latest legislation on monopolies and competition and seek advice from the resources specified in the "Resources" section or from knowledgeable experts in matters relating to cartel and competition law.

In almost every country, the law forbids any relationships or arrangements with competitors, suppliers, distributors or dealers, which might affect competition in the market. Such legal bans apply to a large range of activities including pricing agreements, sharing customers or sales areas between competitors, anti-competition boycotts and other unfair competitive practices. We are committed to fair competition and to observing this legislation.

For this reason, we should ask knowledgeable experts for advice before entering into talks with other companies, e.g. on collaboration agreements or marketing plans. We must avoid even the appearance of taking part in anti-competitive activities.

Fair competition for us also means that with respect to our competitors, we only use generally accessible sources such as the latest news, trade publications and advertising material to gain information on them. We must not disguise our identity or embark on other illegal or unethical procedures to obtain information about competitors.

Example:

At a trade fair, you are talking to an employee of a competitor. After a while, you suspect that your interlocutor would like to propose dividing the customers.

Break off the discussion as soon as you suspect that your interlocutor wants to reach pricing agreements or deals affecting competition! Hilite does not participate in such agreements and any suspicion of an anti-competitive agreement will damage our business. Make it clear to your interlocutor that you and Hilite reject such methods. Then inform your superior without delay.

Product safety

We produce and develop safe products and services for our customers.

We see ourselves as partners to our customers. The success of our business is based on long-term relationships with our customers. We are therefore committed to offering our customers safe products and services of high quality. The quality of our products is a personal matter for us all.

Our products and services must not contain defects or dangerous characteristics, which pose a danger to health or could damage property.

If we recognise problems or risks in production or see an opportunity to improve work processes or production sequences, we will inform our superior or one of the resources specified in the "Resources" section.

We only use parts from approved suppliers through our in-house purchasing department. Deliveries are controlled by regular incoming goods inspections - quantitatively as well as qualitatively. Our incoming goods department is also required to pay particular attention to the following items for identifying counterfeit parts:

- Does the packaging look genuine?
- Do the accompanying conformity documents look genuine?
- Is there evidence of subsequent changes to seals or product sheets?
- Can it be verified that the results stated on the conformity documents meet the buyer's criteria?

Beyond incoming inspection, our suppliers are required to establish quality assurance processes to identify defects and implement corrective actions to provide products that meet or exceed contract quality requirements. Suppliers shall develop, implement and maintain methods and procedures for their products to reduce the risk of counterfeit parts and materials being used in their products. Effective procedures shall be in place to detect counterfeit parts and materials, notify recipients of counterfeit products when justified, and exclude them from products to be supplied.

Protection of intellectual property & confidential information

We respect and protect intellectual property and copyrighted content of any kind. The protection of intellectual property and confidential information is of particular importance to our business as intellectual property and confidential information procure us a competitive edge and are thus of crucial importance for the preservation and growth of our company.

Copyrighted intellectual property comprises all products of the human mind, regardless of their economic value. For example, our intellectual property includes inventions, technical data and computer software, research work and processes as well as business secrets, know-how, copyrighted material, brands and patents.

A breach of intellectual property comprises among other things the exhibition, distribution or presentation of copyrighted material without approval and the reproduction and distribution of intellectual property without permission.

Confidential information is information only intended for its designated recipient and not for internal distribution or external publication. This information can be in the form of documents, reports, contracts, financial data and personnel information, studies, court records, creative work, intellectual property or new business plans or products and it may be in different formats (digital form or on paper, etc.).

We protect intellectual property and confidential information from any breach, unauthorised disclosure or use. To guarantee that this is the case, we never pass on confidential information to anyone — not even within the company — if there is no corresponding necessity. Equally, we do not obtain information to which we are not entitled, and do not use such information either. Legal advice must be obtained before such information is disclosed to third parties or colleagues if there is any doubt about the business necessity for doing so. In such cases, it is important to check whether confidentiality agreements should be entered into. In any cases of doubt, please use the resources specified in the “Resources” section.

We would point out at this juncture that on termination of your employment contract with our company, you must return all documents or files relating to intellectual property or confidential information still in your possession. Even after your departure, your obligation to maintain the confidentiality of this information remains.

Example:

You are on the road and notice that you need information from a password-protected file on your PC. You know your colleague is in the office and could give you the information. However, your colleague is not working on this project.

The file in question consists of confidential business data, which only authorised persons have access to. This also applies to colleagues. On no account therefore should you give your password to your colleague.

Insider information

In the course of our work, we will occasionally come into contact with significant information about our customers, suppliers and others, which is not open to the public (so-called insider information). Significant information not open to the public normally means information not generally available with regard to which it is eminently likely that a knowledgeable investor would take it into account in their decision to buy, sell or hold a company's stock.

In compliance with current laws, we are forbidden from trading with stocks or other company securities as long as we are in possession of important insider information about the company. We are also not allowed to share important insider information with family members or friends. This also applies to colleagues who are not expected to know this information for business reasons.

Example:

On the basis of your work at Hilite, you learn that technical problems have occurred in the production of a listed customer, and that these problems may have a massive effect. You know that your brother has invested a relatively large amount in this customer's shares and you suspect that the company's share price might collapse when the problems become known.

The information about the problems that have occurred is still not publicly known and it therefore constitutes insider information. You are therefore not allowed to tell your information to your brother or any other family members, friends or colleagues.

Data protection

We respect and use all forms of data protection, and we only collect, store and use and transmit personal data (e.g. Names, addresses, telephone numbers, dates of birth, health information) and in-formation in compliance with current laws and regulations.

In collecting, storing, using or transmitting personal data relating to employees, customers or third parties, we employ the greatest possible care and confidentiality, and act in compliance with current laws and regulations.

Employees dealing with the collection, storage, use or transmission of personal data receive advice and support from the responsible legal advisors and the company's Data Protection Officer.

Example:

You find a printout of employees' names with information about their wages and salaries beside the photocopier.

These are employees' personal data, which have to be treated carefully and confidentially. Take the list to the person responsible (e.g. the Human Resource Department) and report your find to the responsible department or your superior.

Statements on products and services

We do not make deliberately false or deceitful claims about our products and services in our advertising.

Truthfulness with regard to our products and services means that we always give true information on our products and services. Information on the cost or price of our products is always up-to-date, complete and correct.

Misleading or false information on our products and services may harm our customers and damage our reputation. This breaches our principles and is inadmissible. It is essential, above all for employees in Sales and Marketing, that these guidelines are followed.

Use & security of information technology

We use the information technology at our workstation for its intended purpose and play our part in protecting systems and devices from internal and external threats.

We regularly use information technology and process data in the course of our everyday working life. This requires appropriate security arrangements (password protection, certified technology and licensed software) in order to protect intellectual property and personal data. Any neglect of suitable security measures may have serious consequences such as loss of data, identity theft or breach of copyright.

Due to the fast distribution, ease of reproduction and virtual indestructibility of digital information, the greatest possible care must be taken with everything sent by email, recorded as a voice message, sent as an enclosure or downloaded.

We undertake to use IT systems at our work desk for permitted business purposes and not for personal purposes, which are inappropriate or inadmissible, or for unethical or illegal activities. Our business email accounts are intended solely for business correspondence. Our employees may only send and receive private emails via private email accounts.

All employees must be aware that any form of IT systems at their work desk represent company assets. This also means that the company is entitled to monitor, check and if necessary disclose the IT system in compliance with the law. If we therefore use company assets such as the IT systems, we know that we cannot assume in all cases that our data will be protected.

We are obliged to take suitable action to protect IT systems from internal and external abuse and threats (such as the abuse of assigned passwords or the downloading of inappropriate material from the internet) and to ensure that data protection is guaranteed. Each individual is obliged to follow the rules listed in the guidelines for the use of IT systems at Hilite. If questions or problems arise, we should also seek advice from the IT Department.

Protection of company assets & combating fraud

We treat company property, products and resources responsibly.

Besides intellectual property, our company provides us with further resources such as working time, materials, equipment, appliances, information and services in order to support us in performing our professional duties. We are jointly responsible for preserving these assets from damage, theft, waste and abuse. These resources may only be used for their intended business purposes and not in any inadmissible, personal, illegal or in any other way unauthorised fashion.

If company assets are used for private purposes, this must be done in a restricted and legal manner and in compliance with our values, standards and guidelines.

We protect all resources made available to us by our customers and suppliers or other business partners in the same way as our own.

Any form of fraud is inadmissible regardless of whether it affects assets of the company or third parties. Suitable control procedures are set up in order to prevent any form of fraudulent activity (e.g. deceit, embezzlement, theft, misappropriation or tax evasion).

PR work & social media

We are all responsible for protecting the good reputation of our company. This naturally applies particularly to employees responsible for our PR work. We relay media enquiries about our company immediately to the management or their appointed officers. Statements on behalf of the company may only be made by authorised employees; this applies in particular to online communication via social media channels.

However, we are all aware of our responsibility for the good reputation of our company, particularly when using social media. We also use our best judgement in our personal use of social media. We do not pass on any confidential or sensitive company information and we make sure that our statements do not harm the company. In particular, we refrain from portraying our own opinions as those of the company. We respect the privacy of our colleagues and business partners.

Job security

We offer our employees a healthy and safe workplace by observing all current legislation and standards on health and safety at the workplace. Managers, in particular, must ensure that suitable health and safety measure and protective mechanisms are in place to ensure that current legislation can be observed and standards met.

But every individual employee is also personally responsible for ensuring that all activities are carried out safely and in a way, which protects the health and safety of our colleagues, visitors and surrounding districts. If we witness job related injuries, illnesses or dangerous conditions, we interrupt our work immediately and report the situation to our superior without delay.

To enable safety at the workplace to be maintained, we must be capable of recognising dangerous situations and taking well-founded decisions. These abilities are impaired by the consumption of alcohol, drugs and other illegal narcotics. Alcohol, drugs and illegal narcotics also impair performance and in some cases lead to behavioural problems. To prevent the occurrence of such problems, the possession of drugs and illegal narcotics on the Hilite site is forbidden. The consumption of alcohol during work is also forbidden as a general rule. On certain occasions, e.g. company parties, anniversaries, birthdays, etc., responsible consumption of alcohol may be permitted with the agreement of your superior.

The guarantee of fair working conditions is an integral part of our corporate culture. We adhere to statutory provisions for ensuring fair working conditions including those governing pay, working times and the protection of privacy.

Human and environment

In respecting human rights, we are committed to the OECD Guidelines (OECD: Organisation for Economic Co-operation and Development)

Observance of human rights and the protection of health and the environment are an integral part of our corporate responsibility.

We respect the dignity and personality rights of employees and third parties with whom we maintain business relationships.

We respect the right to freedom of association and the right to collective bargaining in compliance with current laws and provisions. We reject forced labour and child labour and any kind of exploitation or discrimination and adhere strictly to current legislation.

Our goal is to reduce damage to the environment, preserve natural resources and energy reserves and develop more innovative and more efficient processes to conserve the quality of the environment. In the production and distribution of our products and the provision of our services, we aim for ecologically responsible procurement and use of natural resources (energy, water, material and soil). We therefore utilise and extend our knowledge of manufacturing processes and products to identify opportunities to use resources more efficiently. In accordance with our environmental policy, we do not exceed the legally required emission limits that could lead to a deterioration of air quality or water quality.

Where chemicals have to be handled, this is done in accordance with the established rules of the Responsible Care Initiative and the relevant laws and regulations.

2. Decision-making aids

Do not act and do not take any decision if it is not legally admissible or does not comply with corporate guidelines. If you are unsure whether a certain action or decision complies with the requirements of the Code of Conduct, ask yourself the following questions:

- Can I take an objective decision in the company's interests?
- Is the decision independent of competing personal interests?
- Can I take the decision with a clean conscience?
- Could I easily stand by my action or decision if it were made public?
- Would my decision stand up to a review by third parties?
- Am I sure that my action or decision will not damage the reputation of our company?

If you can answer each one of these questions in the affirmative with confidence, it is likely that your action or decision is appropriate. If you have doubts with regard to one of these questions, obtain advice before acting or making your decision. The next section describes the resources available, which you can draw upon.

3. Resources

At Hilite, you will always find an open door if you want to seek advice, discuss concerns with regard to possible misconduct or make suggestions for improvements to compliance procedures. Many concerns regarding behaviour at the workplace can be solved in a constructive discussion with the persons directly involved or through the support of contact persons on the ground. As far as other questions such as illegal business practices are concerned, it may be better to discuss them with somebody from outside your immediate environment. Reprisals against employees who express concerns in good faith with regard to suspected misconduct are not permitted. Employees who see themselves exposed to reprisals should contact Hilite's management.

The following resources are available to all employees. You can contact a person in your immediate working environment to discuss questions relating to the Code of Conduct or to report breaches, e.g.

- your superior
- your management
- the Human Resources, Finance, Legal or Audit Department,
- your employee representative or
- local Compliance Officer.

If you do not feel comfortable discussing your concerns on site or if your enquiries on site remain fruitless, you can also contact the Global Compliance Officer or a Local Compliance Officer.

Your Compliance Officers are:

Global Compliance Officer:

Gene Hynde, Global VP Human Resources & Global Compliance Officer

Hilite International
Acutex, Inc.
2001 Peach Street
Whitehall, MI 49461
USA
Phone: +1 (231) 894-3277
E-Mail: gene.hynde@hilite.com

Local Compliance Officers:

Germany: **Stephan Jera, Director HR Europe**
Phone: +49 9391 911 1450
E-Mail: stephan.jera@hilite.com

Czech: **Jana Radvanská, HR Manager**
Phone: +420 605 851808
E-Mail: jana.radvanska@hilite.com

US: **Gene Hynde, Global VP Human Resources & Global Compliance Officer**
Contact details, see above

China: **Hillman Zhu, HR & Admin Director Asia**
Phone: +8651252358388300
E-Mail: hillman.zhu@hilite.com

In investigations, care is taken to maintain the greatest possible confidentiality and to observe data protection provisions.

Besides the above-mentioned points of contact, you are also free to use our Whistleblowing-System IntegrityCounts for the following issues:

- Accounting and internal accounting controls
- Auditing offences (false accounting and other breaches of accounting regulations)
- Bribery and corruption
- Banks and financial crime
- Insider trading
- Breaches of human rights
- Breach of environmental protection requirements
- Breaches of non-discrimination rules

This is a communication tool for reporting concerns or suspected breaches of our standards, company guidelines or current law. As with all other resources of the company, we can use

IntegrityCounts with no fear of reprisals. IntegrityCounts is manned round the clock and is administered by an external company.

Reports can also be made through IntegrityCounts anonymously. Remember, however, that it is easier for the company to set up a thorough investigation and implement measures to remedy the situation if you leave your contact details for any possible follow-up.

You can reach IntegrityCounts 24/7/365 in the following ways:

- web-reporting via the IntegrityCounts portal: integritycounts.ca/org/hilite
- reporting via toll free multi-lingual hotline
 - China 400-120-8514
 - Czech Republic 800-144-056
 - Germany 0800 1806718
 - United States of America 1-866-921-6714
- Email address: hilite@integritycounts.ca

Latest version of Code of Conduct:

You can find the latest version of the Code of Conduct on the company intranet at any time.