

Northern Stamping Inc.'s Sustainability Policy and Code of Conduct

- (1) **Human Rights.** Northern Stamping, Inc. (hereinafter "NSI") respects and supports compliance with internationally-accepted human rights policies:
 - (a) **Forced Labor.** NSI condemns all forms of forced and compulsory labor, and does not use forced or involuntary labor, whether bonded, prison or indentured, including debt servitude.
 - (b) **Child Labor.** NSI supports the effective abolition of exploitative child labor, and does not employ individuals in violation of local mandatory school age, or under the legal employment age in each country where they operate. In no case does NSI employ non-family workers under the age of fifteen (15).
 - (c) **Harassment and Discrimination.** NSI upholds equal opportunities with respect to employment and refrains from discrimination in any form, unless national law expressly provides for selection according to specific criteria. Discrimination against employees based on gender, race, disability, origin, religion, age or sexual orientation is not acceptable.
 - (d) **Freedom of Association.** NSI respects the right of all employees to form and join groups for the promotion and defense of their occupational interests.
- (2) **Working Conditions.** NSI is opposed to all exploitative working conditions:
 - (a) **Protection of Health and Safety.** NSI ensures health and safety in the workplace to a level no less than required by national legislation, and support the continual improvement of working conditions.
 - (b) **Compensation.** NSI honors the right to reasonable compensation of a level no less than the legally-established minimum wage and the local job market, based on local laws and regulations. Within the scope of national legislation, NSI respects the principle of "equal pay for work of equal value."
 - (c) **Working hours.** NSI complies with national provisions and agreements regarding working hours and regular, paid holidays.
- (3) **Environment.** NSI supports stewardship of natural resources:
 - (a) NSI participates in and encourages initiatives to promote greater environmental responsibility.
 - (b) NSI complies with all applicable environmental laws and regulations, and promptly develops and implements actions to correct any non-compliant practices.
- (4) **Corruption and Ethics.** NSI is anti-corruption in all its forms, including extortion and bribery.
 - (a) As detailed in the *Northern Stamping Code of Business Conduct*, NSI will not offer or take receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of NSI's business, even in areas where it may be tolerated.
 - (b) NSI strictly adheres to all local and applicable U.S. laws and regulations, including the Foreign Corrupt Practices Act, and requires its Suppliers to act in a similar manner.
 - (c) NSI expects business decisions to be made in the best interest of NSI. Any situation that creates or appears to create a conflict between personal interests and the interests of NSI must be avoided.
- (5) **Suppliers.** NSI expects its Suppliers to introduce and implement equivalent principles in their own companies and their own supply chains.
 - (a) Suppliers should train their employees regularly on these principles, and they must incorporate them as a basis for relations with Northern Stamping.
 - (b) Suppliers must comply with all applicable laws and regulations, which include national and local laws, rules, codes and regulations as well as applicable treaties. NSI strongly encourages any Supplier who feels pressured to violate the law or any provision of this document by an NSI employee to contact NSI's Customer Representative immediately at (216) 407-0758.