



Code of Conduct

Foreword

This Code of Conduct is valid for the whole Heimbach Group. The following companies belong to the Heimbach Group:

Heimbach GmbH, Düren/Germany
Heimbach Ibérica, S.A.U., Burgos/Spain
Heimbach UK Ltd., Manchester/United Kingdom
Heimbach Switzerland AG, Olten/Switzerland
Heimbach Fabrics (Suzhou) Co., Ltd., Suzhou/China
Heimbach Specialities AG, Neu-Moresnet/Belgium
Marathon Belting Ltd., Rochdale/United Kingdom
Industrie Tessili Bresciane Srl, Merone/Italy

The masculine form is used on grounds of easier readability and is not intended to be sexspecific.

1. Basic Assumptions

Business leadership that acknowledges corporate social responsibility is one of the foundational, core principles of business practice. Each and every decision a business makes must consider the consequences from an economic, social and ecological viewpoint. The Heimbach Group (hereafter referred to simply as "Heimbach") must reconcile these interests as appropriate while also keeping in mind the principles of the UN Global Compact (accessible: <http://globalcompact.de/indes.php?id=30>). At the places at which we conduct our business, companies contribute voluntarily – and as individually feasible – to the wellbeing and sustainable development of the global community. The same applies to business relationships within the textile supply chain. Business partners are to be treated fairly. Contracts are to be honored, assuming this would not fundamentally change the underlying conditions. Universally-held ethical values and principles are to be upheld, with particular attention given to human dignity.

2. Scope of Application

This Code of Conduct is valid for all branch offices and business units of the Heimbach Group (see Foreword).

3. Key Aspects of Socially Responsible Business Leadership

Observation of the rule of law

Heimbach signatory to the Code of Conduct observes the laws and legal provisions of the countries in which it does business. Where national regulations are not of a satisfactory standard, Heimbach is to conduct a detailed review of good business practice typical for Germany with the aim of applying the practice to support responsible corporate management.



Heimbach pursues a course of legally unimpeachable, recognized business practice and fair competition. In particular, Heimbach will not be a party to an agreement or adopt a course of action that breaches antitrust legislation.

Heimbach rejects corruption and bribery on the basis of the UN Convention (United Nations Convention against Corruption) on the same. Heimbach uses suitable methods to foster transparency and business integrity, plus responsible company leadership and management. The interests of Heimbach are to be kept strictly separate from the private interests of its personnel. Should it be the case that employees from Heimbach contact suppliers/customers of Heimbach for benefits (in particular money, valuable presents and other "monetary value") in order to promise advantages for them, please contact immediately the Managing Director of the Heimbach Group, Mr. Peter Michels (<mailto:Peter.Michels@heimbach.com>).

Consumer interests

Heimbach considers the interests of the consumer in its business activities. Heimbach ensures that its products present no health or safety hazard when used for the intended purpose. Legal limits are to be observed, with values kept as low as possible. Heimbach also adopts a suitable approach for considering consumer interests in information and marketing activities.

Communications

Heimbach communicates the Code of Conduct and its implementation to employees, business partners and other interested parties internally in its document management system and externally on its website. Heimbach is prepared to discuss the contents of the Code of Conduct. Trade secrets and details of third-party business are handled with due care and confidentiality.

4. Human Rights

Heimbach upholds and promotes human rights as given in the Universal Declaration of Human Rights. Heimbach pays particular attention to upholding the human rights listed below:

- Health and Safety
Heimbach fosters a healthy working environment, working to protect employee health while ensuring occupational safety in order to avoid accidents or injuries.
- Harassment
Heimbach protects its members of staff from corporal punishment, from physical, sexual or psychological harassment, and from intimidation or abuse.
- Freedom of speech
The right to free speech and freedom of expression is both protected and upheld.
- Protection of privacy.

5. Working conditions

Observation of ILO core labour standards (International Labour Organization). Heimbach upholds the eight core labour standards of the ILO. These standards are as follows:

- The prohibition of child labour
(No. 138 Minimum Age, 1973 and No. 182 Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999);
- Prohibition of forced labour
(No. 29 Forced Labour, 1930 and No. 105 Abolition of Forced Labour, 1957);
- The promotion (and where possible the assurance) of the same level of remuneration for men and women for work of equal value
(No. 100 Equal Remuneration, 1951);
- Insofar as legally permissible and feasible in the country of operation, respecting the rights of workers
(No. 87 Freedom of Association and Protection of the Right to Organize, 1948 and No. 98 Right to Organize and Collective Bargaining, 1949);
- The prohibition of discrimination
The scope of the prohibition applies in particular to discrimination based on an employee's sex, race, disability, ethnic or cultural origin, religion or worldview, or sexual orientation (No. 111 Discrimination - Employment and Occupation, 1958).

Working hours

Insofar as the applicable national jurisdiction does not specify a higher figure for maximum working hours, normal working hours are not exceed 48 hours per week. As a minimum, employees are to be granted the equivalent of one free day within a 7-day period. Insofar as provided for by the applicable national jurisdiction, this day may be granted within a period of up to 14 days.

6. Environmental Protection

Heimbach complies with the applicable provisions for environmental protection, such as apply to its various local premises. Heimbach adopts an eco-friendly policy regardless of its place of business: where the applicable local legislation does not provide for a level of protection that guarantees sustainable development, Heimbach will adopt a strategy appropriate to its economic situation in order to achieve a satisfactory level of protection. Furthermore, Heimbach will also treat natural resources responsible in accordance with the principles of the Rio Declaration on Environment and Development of June 1992.

7. Civic Engagement

Heimbach contributes actively to the social, cultural and economic development of the country and region in which it operates, also supporting the voluntary activities of its employees in these areas.

8. Internal Implementation and Application

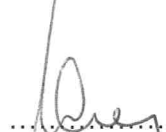
Heimbach makes every appropriate and reasonable effort to ensure the continuous implementation and application of the principles and values defined in this Code of Conduct, and to rectify and related shortcomings as rapidly as possible. On request – and on condition that this occurs on a mutual basis – contracted partners are to be informed about the key

strategies involved. It should be possible for the contractual partner to verify that fundamental compliance with the code is assumed. However, this does not justify the surrendering of trade or business secrets, or of information that is related to competition or is otherwise worthy of protection.

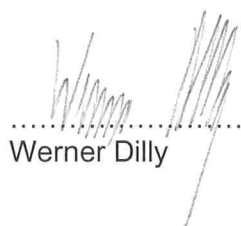
9. Supply Chain Compliance

Suppliers must comply with this Code and the law. Suppliers shall be responsible for any monitoring or documenting of their compliance and their efforts to promote compliance within their supply chains. Heimbach reserves the right to investigate any instances of a supplier's non-compliance of which it becomes aware. Non-compliance may be grounds for Heimbach to void or terminate contractual obligations with a supplier.

HEIMBACH GMBH



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Peter Michels



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Werner Dilly



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Dr. Ralf Kaldenhoff