

Code of Ethics

1. Honesty

The Daniamant Group (hereafter Daniamant) is committed to the highest standards of ethical conduct in all that it does. The Companies comply with all applicable legal and regulatory requirements governing business relationships and international trade, including relevant export and import control regulations. Daniamant believes that honesty and integrity engender trust and it conducts its business in accordance with all the applicable laws and regulations of the countries in which it does business and requires that its employees, agents and advisors also comply with such laws.

2. Prohibition of bribery, corruption and extortion

Daniamant does not offer, promise, give, demand or accept bribes or other unethical inducements, including extortion, in order to obtain, retain or give business or other advantage and takes all reasonable measures within its power to ensure that its employees, advisers, agents and intermediaries follow the same practice.

3. Competition

Daniamant competes fairly and vigorously in its market sector and does not engage in, nor is it party to, any agreements, business practices or conduct that, as a matter of law, are anti competitive or may be construed as participation in trade or associated cartels.

4. Integrity in business behaviour

Daniamant expects its employees to act with integrity at all times. Daniamant employees who have access to privileged information must not use it to achieve personal gain for themselves or others and no employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interests with Daniamant, or which might compromise their ability to meet the responsibilities of their job.

5. Customer, supplier and sub contractor relationships

Daniamant seeks to provide its customers with products and services which meet or exceed their requirement, to respond quickly to changing customer demand and to seek to continuously improve product quality, value and delivery times. Daniamant believes in working in partnership with suppliers and subcontractors to meets its customer's expectations and ensure quality, value and timeliness of delivery. Payment to suppliers and subcontractors will be made promptly within the agreed terms of business.

6. Employees

Daniamant recruits, selects and promotes employees on the basis of their qualifications, skills, ap-

titude and attitude and treats all of its employees with respect and dignity. Harassment or bullying is unacceptable. Daniamant complies with all anti-discriminatory legislation and regulations in the countries in which it does business in respect of its employment related decisions.

7. Health and safety

Daniamant is committed to conducting all its activities in accordance with current legislation and regulations in a manner which achieves the highest practicable standards of health and safety.

8. Environment

Daniamant is committed to a proactive policy on environmental issues. Compliance with legislation is a primary goal. A priority objective is the reduction and management of waste through better utilisation of raw materials, energy resources and water supplies as well as minimising waste at source and employing re-use or recycling techniques.

9. Human rights

Daniamant adheres to all relevant governmental guidelines designed to ensure that products are not incorporated into weapons or other equipment used for the purpose of terrorism, internal repression or the abuse of human rights. Daniamant seeks to uphold all internationally recognised human rights wherever its operations are based.

10. Reporting and internal controls

Daniamant records all business transactions accurately and prudently and transparently in compliance with its accounting and quality standards and utilises appropriate internal controls to ensure all business transactions are managed effectively and that the reported results are accurate. Daniamant will retain and review all records of gifts and benefits, whether accepted or not.

11. Application and compliance

This Code of Ethics applies throughout the company and to all its employees, temporary contractors, agents, consultants and distributors worldwide. Disregard or breach of the code may result in disciplinary action against the employee and sanctions and/or immediate dismissal for third parties representing the company. Daniamant seeks, wherever possible, to ensure that its key suppliers, business partners and any joint ventures in which it participates, complies with the Daniamant Code of Ethics or has in place a similar code and business process of its own. Daniamant expects employees to bring any suspected or actual breach of the Code promptly to management attention. Any employee making such information known to management through the appropriate procedures will not face any adverse or unfavourable treatment for such disclosure.

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