

Code of Conduct

Roba Metals B.V.

Preface

By means of this code of conduct Roba Metals B.V. (hereafter: Roba) confirms her social responsibility. Roba started in 1937 and exists for over 75 years now. Ever since Roba started in the first half of the last century the company expanded its activities. During Roba's long and rich history the values that the company finds important have not changed. Roba is build around the following core values:

- High level of customer service
- Excellent service
- Flexibility
- Cost-consciousness
- Trustworthiness
- Social responsibility

The above mentioned core values are part of Roba's collective norms and values and together they make that Roba makes a difference and distinguishes itself from other companies. Our core values are laid down in this code of conduct. The content of this code of conduct is comparable to the international accepted norm "guidance and social responsibility" (ISO 26000). This code of conduct is conducted as a so called 'self regulated' directive and is binding to all employees of Roba (Metals B.v.).

The following subjects will be addressed in this code of conduct:

1. Social responsibility
2. Human rights
3. Labor practice
4. Environment
5. Fair business
6. Active participation of the company in the development of the community

1. Social responsibility

- 1.1 This code of conduct is based on the ISO-norm for social responsibility. This means that Roba takes into account the consequences of its decisions and activities on a social, economic and environmental level. Roba will consider all the interests in its decision making process. Roba will do its utmost to contribute to the development of a sustainable environment and community. Roba contributes by investing in education and training programs within the organization but also by supporting several non-profit organizations in and outside the Netherlands.

2. Human Rights

- 2.1 Roba will do its utmost to promote the universal human rights. Roba acknowledges and respects the European Convention on Human Rights as well as the Universal Declaration of Human Rights of the United Nations. Roba pays special attention to the following human rights: the right to health and safety, freedom of speech, religion and belief, the right to privacy and equal treatment.

3. Labor practice

- 3.1 Roba endorses the core values with regard to the labor practices as stated in the ILO conventions.
- 3.2 Roba ensures that the working conditions are in accordance with the (inter)national law.
- 3.3 Roba offers its employees excellent labor conditions among others with regard to wages, working hours, resting times, vacation and health and safety.
- 3.4 Roba condemns forced labor.
- 3.5. Roba condemns child labor (and the employment of children younger than 15 years of
- 3.6 Roba acknowledges the importance of a social dialogue within the organization and will acknowledge the right of its employees to organize in a union.
- 3.7 Roba takes care of the occupational health and safety policy. Roba will demand from its employees that they will always work in a safe manner. Roba takes necessary measurements with regard to safety to prevent labor accidents, illnesses and general accidents.
- 3.8 Roba will help its employees to develop their skills in every stage of their career by providing training and education in an equal and non-discriminatory way.

4. Environment

- 4.1 Roba endeavors to comply with all applicable laws and regulations with regard to the environment. Roba takes responsibility for all the effects that its activities have on the environment. Roba always strives to improve its practices with regard to the improvement of the environment.

4.2 In its environmental policy Roba respects the Rio Declaration of environment and Development.

5. Fair business

5.1 Roba aims its activities on the universal acknowledged ethical norms and values (amongst others): integrity, honesty, respect for human dignity, transparency and nondiscrimination.

5.2 Roba condemns corruption and always tries to avoid this. Roba makes sure that the policies within the company fight corruption and Roba strictly maintains this policy. In this regard Roba acknowledges the rules as safeguarded in international convention by the United Nations as well as the UK Anti-Terrorism, Crime and Security Act 2001 and the UK Bribery act 2010.

5.3 Roba endeavors a pure and fair commercial practice as well as fair competition.

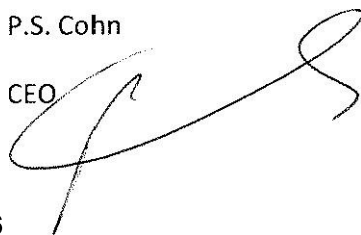
6. Active participation of the company in the development of the community

6.1. Roba acknowledges the cultural, religious, traditional and historical characteristics of the communities Roba is involved in and has appropriate appreciation for their habits.

6.2. Roba is aware of its position in the community and endeavors to fulfill this as good as possible. Roba undertakes and supports various projects in as both the Netherlands and other countries and makes sure that its employees are involved in these projects.

P.S. Cohn

CEO

A handwritten signature in black ink, appearing to be 'P.S. Cohn', written over the printed name and title.

IJsselstein, 21 April 2016