



DEMME CORPORATION SUPPLIER CODE OF CONDUCT

OVERVIEW

Since 1950 Demmer Corporation has been a responsible and successful enterprise that focuses on providing the Demmer Experience of Genuine Value to customers, employees, investors, dealers, suppliers and the communities where we do business. Demmer Corporation is guided by its core values of integrity, quality, innovation and commitment as it delivers performance that endures. Demmer Corporation's commitment to integrity and social responsibility extends to its diverse and worldwide supply base. To ensure that suppliers conduct business with a high degree of integrity and in a socially and environmentally responsible manner, all of Demmer Corporation suppliers are expected to adhere to this Supplier Code of Conduct. These values are of more importance with the committed amount of U.S. Military (Government) work being done at Demmer Corporation.

Supplier Responsibility

Suppliers are expected to do what is necessary to comply with this code without delay. Suppliers are expected to be familiar with the business practices of their suppliers and sub-contractors and ensure they operate within the guidelines of this code. Failure to comply with this code may result in discontinuance of business relationships.

Gifts and Gratuities

Demmer Corporation and its individual employees are not permitted to accept gifts from current or potential suppliers. Departmental gifts of nominal value are allowed such as Holiday Baskets etc. that all can partake in. Although giving gifts is acceptable in some cultures, Demmer Corporation requests that suppliers respect its policy of not accepting gifts.

Conflicts of Interest

In addition to Conflict of Interest statement in the Employee Handbook the following should apply:

Demmer Employees must not be involved with procurement decisions regarding any vendor or supplier with whom they have an investment. A member of the Executive Team has the direction to establish specific limits upon employees where there is a risk of a conflict of interest.

Improper Payments

Demmer Corporation conducts business with high integrity and within the bounds of the law. Bribery and kickbacks are illegal and subject to criminal penalties in many countries, including the United States. Bribes, kickbacks and similar payments to government officials, Demmer Corporation's employees or agents acting on Demmer Corporation's behalf are strictly prohibited. This prohibition also applies in areas where such activity may not violate local law.

If you as a supplier suspect an impropriety in the procurement process by a Demmer employee, you are expected to notify our Human Resources Department at 517-321-3600. They will contact you with the disposition of your concern.

Child Labor

Demmer Corporation will not engage in or support the use of child labor. Suppliers are expected to comply with applicable local child labor laws and employ only workers who meet the applicable minimum legal age requirement for their location. In the absence of local law, suppliers shall not employ children under the age of 14.

Forced Labor

Demmer Corporation will not engage in or support the use of forced or involuntary labor. Demmer Corporation will not purchase material or services from a supplier utilizing forced or involuntary labor.

Compensation and Working Hours

Demmer Corporation pays employees a competitive wage. Suppliers are expected to comply with all applicable wage and hour labor laws and regulations governing employee compensation and working hours.

Discrimination

Demmer Corporation supports diversity and equal opportunity in employment. Unlawful discrimination in the workplace is not tolerated. Suppliers are expected to comply with all applicable local laws concerning discrimination in hiring and employment practices.

Environment

Demmer Corporation respects the environment and conducts its operations in compliance with applicable laws and regulations. Suppliers are expected to conduct their operations in a way that protects the environment. Suppliers are expected to comply with all applicable environmental laws and regulations in the countries in which they operate.

Health and Safety

Demmer Corporation is committed to the safety and health of its employees and conducts its operations in compliance with applicable laws and regulations. Suppliers are expected to provide a safe working environment that supports accident prevention and minimizes exposure to health risks. Suppliers are expected to comply with all applicable safety and health laws and regulations in the countries in which they operate.

Confidential Information

Demmer Corporation is dedicated to complying with applicable laws concerning proprietary, confidential and personal information. Suppliers are expected to comply with all applicable laws and regulations governing the protection, use and disclosure of Demmer Corporation proprietary, confidential and personal information. Demmer Corporation expects all Suppliers to sign a Non-Disclosure/Non-Compete document prior to doing business.

CONTACT INFORMATION

For questions or comments on the Demmer Corporation Supplier Code of Conduct, please contact Human Resources at: www.demmercorp.com. Violations of the Demmer Corporation Supplier Code of Conduct should be reported using one of the following confidential options:

Telephone: 517-321-3600

Mail: Demmer Corporation
Attn: Human Resources
1600 N. Larch St
Lansing, MI 48906

NON-COMPLIANCE REPORTING

The Demmer Corporation Code of Conduct is based on the Demmer Corporation Business Conduct Guidelines, which can be found online at: www.demmercorp.com