



Form Technologies Inc. Global Code of Conduct

The Form Technologies Inc. Code of Conduct applies to all of us and provides important principles and guidelines for ethical conduct. It expresses our intent and expectation to uphold the highest standards of integrity. All Form Technologies Inc. employees around the world, including all Form Technologies Inc. subsidiaries, must adhere to the principals and requirements contained in this Code.

Your Responsibilities

As an employee in a Form Technologies Inc. company, you need to review this Code thoroughly and refer to it when work issues arise and you are unsure how to proceed. Your business unit may issue its own policies and procedures - you must follow those policies and procedures in addition to those found in this Code. You must also comply with all laws, rules and regulations that apply to your business.

We all need to “think before we act,” and we must always use good judgment. Before you act, ask yourself the following questions:

- Is it the right thing to do?
- Is it legal?
- Do I have the authority to act?
- Does my action comply with the Code of Conduct?
- Would I be upset or embarrassed if other people, such as my coworkers or family members, found out about this action or if it were published in the news media?

And remember, if you are unsure about the right thing to do, Form Technologies Inc. encourages you and expects you to ask someone on your management team. A lack of knowledge is not an excuse.

Managers and Supervisors

If you are a supervisor or manager, you are responsible for knowing the Code and helping the people who report to you become familiar with its contents. You’re also responsible for preventing violations of the Code, as well as detecting violations that may occur and reporting them appropriately. You’re expected to:

- Lead with integrity
- Encourage employees to ask questions and help them get answers
- Create an environment where employees can raise concerns without fear of retaliation
- Protect the health and safety of Form Technologies Inc. employees
- Protect the accuracy and quality of Form Technologies Inc.’s products and financial records
- Never compromise Form Technologies Inc.’s reputation

We Maintain Safe and Responsible Workplaces

Form Technologies Inc. is committed to creating and maintaining a safe working environment and preventing workplace injuries. Through management leadership and employee commitment, we work to conduct our operations in a safe and healthy manner.



Safety First

As Form Technologies Inc. employees, we must take responsibility for observing all safety and health rules, policies and procedures. This includes taking precautions necessary to protect yourself, your coworkers and any onsite visitors.

You must always use the personal protective equipment that is required for your job, such as safety glasses, hard hats, safety shoes and protective clothing. You must always report immediately any workplace accident, injury, occupational illnesses or unsafe practices to your supervisor or manager. All of us should proactively address safety concerns before they cause an accident or injury by bringing them to the attention of a supervisor, safety representative, a member of the plant safety committee or human resources. Suggestions to improve workplace safety are welcome and should be reported to your plant or general manager, safety representative or safety committee for consideration and evaluation.

Work Environments Free From Unlawful Discrimination or Harassment and Violence

We respect people for who they are and what they are capable of doing. We are committed to providing you with a safe, secure work environment, free from unlawful harassment, discrimination and violence.

Form Technologies Inc. does not tolerate unlawful discrimination in the workplace or from any of its employees or representatives. We must always deal with coworkers, job applicants, customers and suppliers without regard to their race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, veteran status or other status protected by applicable law.

Sexual harassment by employees or others, including vendors, salespeople, customers and visitors is strictly prohibited, as is any other type of unlawful harassment, including harassment based on individual characteristics (for example, race, color, religion or cultural background).

Workplace violence or the threat of violence is unacceptable. Violent behavior or threats should be reported to your supervisor or the human resources staff, and will be investigated. Employees who engage in violence or threats of violence may be subject to disciplinary action or termination, as well as criminal prosecution.

A Drug-Free Work Environment

Because safety comes first, you must remain free of the influence of alcohol, drugs, or any other substance that may impair your ability to perform your duties safely and efficiently. You must know and follow the drug and alcohol policies of your workplace whenever you are conducting business for Form Technologies Inc., both on company premises and when you are representing Form Technologies Inc. away from the workplace.

We Maintain Accurate and Complete Financial Records

We must always keep complete, accurate, timely and understandable financial reports. Doing so not only meets our obligations to government regulators, our shareholders and external stakeholders, but also protects our reputation and supports our internal business decisions.

Providing Accurate Numbers

All finance employees (including accounting, treasury and tax) are responsible for understanding and following Form Technologies Inc.'s finance policies. Deviation from Form Technologies Inc. policy without prior approval is unacceptable.



We maintain the integrity of Form Technologies Inc.'s financial reporting in several ways:

- Promoting and providing disclosures that present the information appropriately (i.e., accurately, completely, objectively, relevantly, timely and understandably)
- Keeping Form Technologies Inc. financial data in a manner that fully complies with Form Technologies Inc.'s policies and all applicable laws, rules and regulations including generally accepted accounting principles (GAAP)
- Maintaining effective internal controls over financial reporting
- Protecting the confidentiality of information we use
- Proactively resolving all known accounting matters in a timely manner, including elevating matters to the appropriate levels within Form Technologies Inc. (including the CFO and CEO) until satisfactorily resolved

Any concern about the accuracy of our financial books and records, accounting matters or internal control over financial reporting should be raised immediately and brought to the attention of the Group CFO or Group CEO or a member of the Audit Committee of the Board of Directors.

Every employee involved in the Form Technologies Inc. financial reporting process is required to comply with our disclosure controls and procedures and internal control over financial reporting to the extent relevant to the employee's area of responsibility.

Never Crossing the Line

As Form Technologies Inc. employees, regardless of our position or job responsibilities, it is our obligation to make certain the company's books and records are accurate. No entry may be made on the company's books and records that intentionally hides or disguises the true nature of any transaction. Under no circumstance should you:

- Deliberately make a false or misleading entry in a report, record or expense claim
- Falsify any record, whether financial or non-financial (such as safety, environmental or quality results)
- Buy, sell, transfer or dispose of company assets without proper documentation or authorization
- Try to influence others to do anything that would compromise the integrity of Form Technologies Inc.'s financial records or reports

Form Technologies Inc. has zero tolerance for falsifying or creating any misleading information.

Cooperating with Auditors

The audit process is vital to maintaining the integrity of Form Technologies Inc.'s financial records. Form Technologies Inc. has internal and external auditors who help ensure that our financial reporting is truthful, accurate, complete, objective, consistent, timely and understandable.

All Form Technologies Inc. employees must give auditors their full and complete cooperation. Refusing to cooperate with an auditor or providing false or misleading information to an auditor is grounds for discipline or termination.



We Protect Form Technologies Inc.'s Reputation

To succeed, Form Technologies Inc. relies on the quality of our products and our people, not on an unfair or illegal advantage. That reputation is an important company asset, and we all must work diligently to avoid tarnishing it through improper gifts or payments and conflicts of interest.

Numerous countries in which Form Technologies Inc. operates have anti-bribery and anti-corruption laws which prohibit the offer or payment of anything of value or other improper inducements to secure a competitive advantage or otherwise corruptly influence anyone's action, inaction or decision making. Form Technologies Inc. requires full compliance with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act. It is also Form Technologies Inc.'s policy to require that those agents, consultants and business partners who work on Form Technologies Inc.'s behalf comply with these same laws and practices.

Conflicts of Interest

Making sure that our integrity remains uncompromised is fundamental to maintaining trust with our customers and suppliers. On the job or in our free time, nothing we do should conflict with our responsibilities to Form Technologies Inc. No activity at work or at home should hurt Form Technologies Inc.'s reputation or good name. Even when nothing wrong is intended, the appearance of conflicting interests can have negative effects. It is crucial to consider how your actions might appear, and to avoid even the perception of a conflict of interest. Examples of actual or apparent conflicts of interest include the following:

- Having financial interests in a company where you could personally affect Form Technologies Inc.'s business with that company, such as a customer or supplier
- Receiving personal discounts or other benefits from suppliers, service providers or customers that the public or your Form Technologies Inc. coworkers do not receive
- Directing business to suppliers when you know they are owned or managed by your family members or close friends
- Misusing Form Technologies Inc. resources, your position or influence to promote or assist an outside activity
- Directly or indirectly hiring, promoting or supervising a family member or close friend
- Allowing personal relationships to conflict with your Form Technologies Inc. responsibilities or compromise company interests
- Having a second job that you perform using Form Technologies Inc. hours or Form Technologies Inc. equipment or materials

If you become aware of a conflict or the appearance of a conflict of interest, or if you are unsure whether an actual or apparent conflict of interest exists, you must promptly disclose the situation to your supervisor or general manager and follow their recommendation. You also may contact Form Technologies Inc. corporate office for guidance.

Gifts, Loans and Entertainment

Gifts and entertainment are a normal part of doing business, but when used inappropriately, they may call our integrity into question. Form Technologies Inc. has rules for giving and receiving gifts, loans and entertainment to prevent any impropriety or damage to Form Technologies Inc.'s reputation. You may not ask for gifts or loans, directly or indirectly. This applies to suppliers, customers, and government officials doing business, or seeking to do business, with Form Technologies Inc.



You may accept unsolicited, inexpensive gifts from existing or potential suppliers or customers. However, if you are unsure whether a gift's value exceeds this standard, seek guidance from Form Technologies Inc. corporate office. Gift baskets may be accepted if shared with others in the office.

You may never give or accept a cash gift or loan under any circumstance.

If a vendor, supplier or customer invites you for a reasonable and customary business meal or entertainment at their expense, you may accept the invitation. If you are uncertain as to what is "reasonable and customary," please seek advice.

When giving gifts, the same principles apply. You may provide gifts, meals or entertainment as long as they are reasonable in value and customary in nature, are unsolicited, and are not intended to obtain an unfair advantage or improper influence.

Governments in many parts of the world have stringent requirements regarding gifts, loans and entertainment, and violations of these rules can be serious offenses. For example, giving gifts, loans or entertainment to U.S. government employees is strictly prohibited. If you deal with a government, make sure you know the rules that apply. Seek advice from the Form Technologies Inc. corporate office if in doubt.

Never accept or give any business gift, entertainment or courtesy if it will compromise or appear to compromise your ability to make a fair and objective business decision.

Never accept or give any business gift, entertainment or courtesy if public disclosure of the facts would embarrass Form Technologies Inc.

Improper Payments

An improper payment (such as a bribe or kickback) to gain advantage is never acceptable and exposes you and Form Technologies Inc. to possible criminal prosecution. Form Technologies Inc. prohibits improper payments in all business dealings, in every country around the world, with both governments and in the private sector. To be clear—offering, accepting or facilitating bribes, kickbacks, payoffs or other unusual or improper payments to obtain or keep business is unethical, illegal and strictly forbidden at Form Technologies Inc.

Working with Suppliers

Form Technologies Inc.'s suppliers play a critical role in our ability to operate and provide products and services to our customers. To protect Form Technologies Inc.'s reputation and perform with integrity, we must choose our suppliers carefully, based on merit and with the expectation and requirement that our suppliers will act in a manner consistent with our compliance and ethics standards.

At Form Technologies Inc., we follow these guidelines when selecting suppliers:

- Do business only with suppliers who comply with all applicable laws, rules and regulations and Form Technologies Inc.'s compliance and ethical standards.
- Do not do business with a supplier who has known or suspected unsafe working conditions or exhibits a disregard for environmental standards.
- Choose suppliers based on open, competitive bidding, without favoritism or unlawful discrimination.
- Do not participate in any decision to direct business to a supplier owned or managed by a relative or close friend. Disclose the relationship in advance to those involved in making the decision.



When working with suppliers, follow these guidelines:

- Safeguard Form Technologies Inc.'s confidential and proprietary information with a confidentiality or non-disclosure agreement, and safeguard any supplier-provided information protected by any similar agreement.
- Require the highest standards of product quality, testing and inspections according to customer specifications, and communicate these expectations clearly.
- Never accept loans, improper gifts or other items of excessive value from suppliers.
- If you have concerns that a Form Technologies Inc. supplier is not operating within Form Technologies Inc. standards, it is critical that you promptly raise your concern with your supervisor or general manager, EVP of your region or Form Technologies Inc. corporate office.

We Protect Company Information and Assets

Form Technologies Inc.'s assets include physical assets, such as equipment and facilities, and proprietary information, such as trade secrets and intellectual property. These assets enable us to do our jobs and are an important part of the company's success - we must protect them from theft, damage, loss, or misuse. We must also protect any property of our suppliers and customers that we are entrusted with, such as tooling or other equipment. This includes:

- Restricting access to Form Technologies Inc. facilities to authorized personnel and visitors only
- Protecting assets (including your laptop) from theft or misappropriation
- Providing adequate safeguards for hazardous materials, critical operational and proprietary information and physical assets
- Promptly reporting any security lapses to your supervisor or manager

Confidential and Proprietary Information

Form Technologies Inc.'s intellectual property and its confidential or proprietary information are among Form Technologies Inc.'s most valuable assets. We must all work together to safeguard such information, and must not:

- Discuss or provide Form Technologies Inc. confidential and/or proprietary information to outside companies or individuals without a legitimate Form Technologies Inc. business purpose and only with the proper safeguards in place to protect the information from misuse.
- Discuss or provide Form Technologies Inc. proprietary information to outsiders without a signed confidentiality or non-disclosure agreement in place
- Discuss or provide customer or supplier proprietary information with outsiders unless authorized by the customer or supplier
- Allow Form Technologies Inc. employees to use proprietary information from a prior employer

It is important that we respect the valid intellectual property rights of others. Unauthorized use of others' intellectual property or proprietary information can expose the company and Form Technologies Inc. employees to civil lawsuits and damages, including significant fines and criminal penalties.

Corporate Opportunity

Employees may not exploit for their own personal gain opportunities that are discovered through the use of Form Technologies Inc. property, information or position.



Information Privacy

Form Technologies Inc.'s communication systems—including computers, email, intranet and Internet access, telephones, mobile phones and voicemail—are the property of Form Technologies Inc. and are to be used primarily for business purposes. Form Technologies Inc. has a significant investment in these vital systems and networks, and our business depends on their continued functioning. We all must use care and common sense in using these systems. These communication systems may be used for personal messages provided that such use is kept to a minimum and in compliance with this Code and applicable policies. You may not use Form Technologies Inc. communication systems for any of the following purposes:

- To send harassing, threatening, discriminating, obscene or inappropriate messages or jokes
- To install or use file-sharing or peer-to-peer networks
- To conduct any illegal, unethical or improper business or non- Form Technologies Inc. business
- To access inappropriate internet content, such as threatening, discriminatory or pornographic materials
- To send or download copyrighted documents that are not authorized for reproduction

Form Technologies Inc. has the right to monitor the use of these resources including email, voicemail, computers, mobile phones and documents. Monitoring may be performed for any legitimate business reason and in compliance with applicable laws. You should not expect privacy for any information, personal or otherwise, residing on any company communication system.

External Communications

To protect our company's name and reputation, we have a single office that is authorized to speak to the public on behalf of Form Technologies Inc. Inquiries or requests for information from investors, analysts and the media require careful consideration and a unique understanding of legal and media issues. Any such inquiries should be directed to the EVP of your region, Divisional CEO, the Group CFO or Group CEO.

We Comply With Laws and Regulations

Because we do business around the globe, we operate in a variety of communities with different legal, ethical and cultural standards. It is our policy to comply with all applicable laws, rules and regulations, and we expect our suppliers to do so, too.

International Trade

As a global company, Form Technologies Inc. deals regularly with foreign companies as customers and suppliers. In doing so, we must follow the laws, rules and regulations of the United States and other governments that control and restrict international trade in certain commodities, products, technical data and services.

Form Technologies Inc. also must comply with laws regarding U.S. trade embargoes. There are certain countries with which essentially all trade is banned – Syria, Cuba & Iran - we are not permitted to export to/import from those countries or to do any business with companies from those countries even if located elsewhere. It is important to note that although your country may allow trade with these countries, Form Technologies Inc. as a US corporation is accountable under US law for the actions of its subsidiaries even if they are based outside of the US. It is therefore Form Technologies Inc. policy that no company within the group trades with the nations of, or companies from Syria, Cuba & Iran.



Apart from the blanket ban on business with the above 3 nations, there are restrictions as to the type of goods that can be traded with a number of other countries:

- Libya
- Colombia
- Republic of the Congo
- North Korea
- Sudan
- Myanmar
- Cote d'Ivoire
- Somalia

It is Form Technologies Inc. policy that no business is undertaken with the above countries or with any other countries with which trade is banned under U.S. laws, without the express written permission of the Group CFO or Group CEO.

If your job involves dealing with foreign countries (either buying or selling products) or foreign customers, suppliers or visitors, you must make sure you understand and follow all laws and regulations regarding import and export compliance, boycotts and embargoes. Violation of these laws has serious consequences for both the individuals involved and Form Technologies Inc., including civil or criminal penalties, loss of government contracts, and loss of export privileges. If you have questions or need guidance, you should contact your division's export control specialist or Form Technologies Inc.'s CFO.

Political and Charitable Activities

Form Technologies Inc. does not participate directly in political party activity and does not make political contributions, whether in cash or in kind, anywhere in the world. Form Technologies Inc. complies with all national, state, local and foreign laws regulating Form Technologies Inc.'s participation in political affairs, including limitations on contributions to political parties, national political committees, and individual candidates.

Under no circumstances should any political contribution be made, by or on behalf of Form Technologies Inc., without the prior written approval of Form Technologies Inc. CFO or CEO. Form Technologies Inc. employees may participate in the political process on their own time and with their own resources, but they must always make clear that their views and actions are their own and not Form Technologies Inc.'s.

Form Technologies Inc. encourages its employees to be involved in community and civic affairs. Charitable contributions made by or on behalf of the company must be pre-authorized by the EVP of your region. This includes financial gifts, donations, sponsorships, underwriting, membership payments or in-kind gifts made to charitable organizations or institutions or to qualified non-charitable civic or community groups.

We Raise Our Concerns

If you become aware of a situation that may violate this Code, company policy or the law, you need to report it promptly. We cannot perform with integrity if we simply look the other way or ignore a concern. Many problems and risks can be fully resolved or their impact reduced if they are addressed early. The success of Form Technologies Inc. demands that you speak up when you have a question or concern.

Employees who have knowledge of an actual or suspected violation of this Code or a company policy and fail to timely raise a concern may be disciplined or terminated.



Where to Seek Guidance and Raise Concerns

To raise questions or concerns about compliance or a violation of this Code or any Form Technologies Inc. policy, including those of Form Technologies Inc.'s subsidiaries, use the following channels:

- If you are based in a Form Technologies Inc. subsidiary, you should contact your supervisor, human resources representative or general manager in the first instance. If the matter is not satisfactorily resolved it should be escalated to the EVP of your Region, or your Divisional CEO.
- If you are based in the corporate office, contact your department head in the first instance; if the matter is not satisfactorily resolved it should be escalated to the Group CFO or Group CEO.
- Contact the Form Technologies Inc. CEO, CFO or the Chairman of the Audit Committee of the Form Technologies Inc. Board of Directors for matters that have not been satisfactorily resolved at the plant or regional level and for finance-related issues.

If you wish to remain anonymous you can contact Christy Leapley, who is an independent consultant, as follows:

By mail: Christy Leapley, 14045 Ballantyne Corp. Place, Suite 400, Charlotte, NC 28277, USA
Direct line: +1 980 297 7339
Dedicated email: whistleblower@formtechnologies.com

No Retaliation for Raising Concerns

Form Technologies Inc. strictly prohibits retaliation against anyone for raising or helping to address a suspected violation of this Code or any company policy in good faith. Retaliation by any Form Technologies Inc. employee is grounds for discipline or termination.

Annual Ethics and Finance Questionnaires

Annually, questionnaires will be sent to certain Form Technologies Inc. employees including all officers, key management, and certain employees in finance, accounting, treasury, tax, legal, human resources, purchasing, planning, IT, and sales. The questionnaires are designed to determine whether a conflict or potential violation of company policy or this Code exists. These annual questionnaires are required by our Board of Directors. The completed questionnaires also help us monitor and address our compliance with this Code and reinforce our commitment to always perform with integrity. Failure to complete the questionnaires or answer them truthfully may be grounds for disciplinary action up to and including termination.

Penalties for Violations

Employees who violate the letter or spirit of Form Technologies Inc.'s policies set forth in this Code of Conduct are subject to disciplinary action up to and including termination. Misconduct that may result in discipline or termination includes:

- Violating Form Technologies Inc. policy
- Asking others to violate Form Technologies Inc. policy
- Failing to promptly raise a known or suspected violation of Form Technologies Inc. policy
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- Failing to cooperate in an investigation conducted by Form Technologies Inc., its customer or a government agency
- Retaliating against an employee who has raised or helped to address a good-faith concern
- Failing to demonstrate leadership and diligence in promoting compliance with Form Technologies Inc. policy and the law

Administration

The Code of Conduct will be provided to all employees in the local language(s) of your plant. Your local plant management will explain the significance to you of the Code of Conduct and answer any questions that you may have. The Code is available in the “policies” section of the Form Technologies Inc. web site in English and will also be posted on plant notice boards in your local language. If there are any changes to the code over time, they will be posted on the website and on your local notice boards.

Conclusion

Remember, no matter which Form Technologies Inc. company we work for, we are all members of the Form Technologies Inc. team, and we share in the company’s success. Our company cannot truly succeed unless we all perform with integrity, every day and in every circumstance.