



**MAYCO**  
INTERNATIONAL

**PASSION TO INNOVATE.  
POWER TO DELIVER.**



**PRIDE  
VISION  
FAMILY  
INTEGRITY**

## **MAYCO INTERNATIONAL'S CODE OF CONDUCT**

Welcome! Mayco international has offered you this Code to complement your own good judgment. We will remain a vibrant, productive part of the global business community by working together, communicating openly, and demanding integrity and ethical behavior at every level of our business. Let's get started!

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**Nick DeMiro**  
President

“

### **AS A FAMILY**

*we work extremely well together, we take Pride in our work and our work areas, we do what we do with a sense of purpose and Integrity, and we do it all with a Vision of a better future for our own families, our business and our community.*

”

# **WELCOME!**

Welcome to Mayco International LLC. I want to take this opportunity to tell you how much we appreciate you joining our team. At Mayco, our vision is to continue to be one of the best suppliers in the world and to continually improve, innovate and grow. We believe that with the right combination of people, equipment, products, and services, we will accomplish this vision.

This level of excellence requires a commitment on your part to help us become the best in the business. Your commitment to excellence means that we can count on you to do the best job that you possibly can with honesty and integrity. To help accomplish this task, we have provided you with a Code of Conduct. We hope you will agree that these policies are designed to make Mayco a great place to work. No Code of Conduct can cover every situation, so you are welcome to ask questions or seek guidance before you make any difficult decisions your job may require.

On behalf of Mayco, I would like to thank you again for being part of our team. We look forward to working with you.

**Nick DeMiro**

If you should have any questions about anything in this Code or about the company in general, please contact Human Resources.

Mayco International is

# COMMITTED TO INTEGRITY

*Integrity: Integrity is doing the right thing even when nobody is watching.*



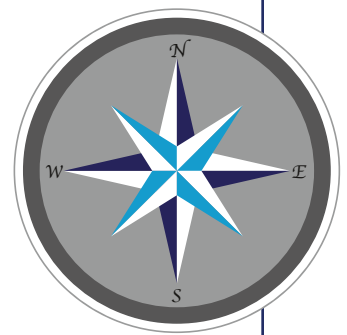
**PRIDE**



**INTEGRITY**



**FAMILY**



**VISION**

Mayco International is dedicated to remaining a vibrant and innovative 21st century engineering and manufacturing company. We pride ourselves for being consistently singled out as one of the best automotive suppliers in the world. In order for you to understand your employment with Mayco International, we have provided you with this Code of Conduct. As you read through our Code, you will gain an understanding of our history, business culture, and the high expectations Mayco International holds for all of its employees. Likewise, you will gain an understanding of how our company truly cares for each and

every member of our organization. We all work together for the common goals of Safety, Quality, and Continuous Improvement. Your success here at Mayco International depends on your understanding of the ethical standards of our company, and your rights and responsibilities as you work toward your own individual goals. Be assured that as you conduct business on behalf of Mayco International, you will be expected to follow all applicable laws, whether here or abroad, and to work with integrity and a commitment to ethical business practices.

Refer to the Code whenever faced with a decision that will involve your reputation and the reputation of our company. Be confident that you may freely speak up without fear of reprisal whenever you believe the code has been violated.



# THE CODE OF CONDUCT APPLIES TO ALL OF US.

Each of us has an obligation to read and understand our Code of Conduct.

It applies to every employee who works for Mayco Group, here in the States and around the world.

The Code does not, and is not, intended to interfere with or limit any rights employees may have under the law. Nor is it intended to inadvertently provide additional rights such as any promise of employment. If there is a conflict between the Code of Conduct and any fully operational collective bargaining agreement, the bargaining agreement shall control.

Diverse laws and regulations within the United States and in other countries may be a challenge to understand. Compliance may require assistance from management or our other help resources. Ask if you don't know or understand what is required by a law, statute, ordinance or custom. Ignorance is no excuse for wrong actions.



**Q:**

If I have a question or concern about a policy, rule or something in the Code of Conduct what should I do?

**A:**

If the matter is not urgent, speak directly to your own supervisor and provide him or her with adequate time to address the issue with the appropriate parties. If you have no resolution to your question or concern after 10 business days, then you should make a written request to Human Resources.

Of course, you also have the option to go “up the chain of command” to seek guidance or get answers to questions you may have.



*The highest priority we have is*



# KEEPING OUR EMPLOYEES **SAFE AND HEALTHY.**

## **SAFETY**

Compliance to safety policies and procedures is required of all employees. Mayco International encourages everyone to report all incidents or near misses that have or may result in an injury. There is no greater devotion to the idea of continuous improvement than in providing a safe place to work. It is the mission of Mayco International to provide the proper training and tools so that our teams can do their jobs without unnecessary risk of harm.

## **SUBSTANCES**

An employee under the influence of a substance imposes significant risk to self and fellow employees. Violations of our Drug and Alcohol Policy will always be dealt with seriously. Supervisors must escalate suspicions or reports of workplace violations involving substance-based impairment immediately. Law enforcement may be called in to help deal with these situations if warranted.

## **VIOLENCE**

If you suspect that violence may erupt due to a workplace altercation or job dissatisfaction, or you know of a threat that has been made, report it immediately. Supervisors must escalate these types of reports to the highest authorities including involving law enforcement in order to maintain a safe working environment.

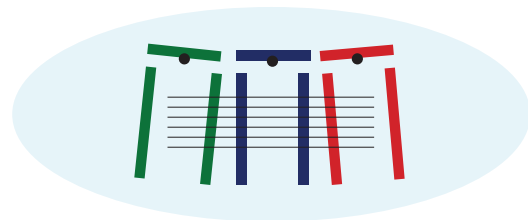
Any suspicious behavior that might lead to violence must be reported immediately!



If you have questions or concerns, please see your HR or Supervisor.

*Mayco has many training and tools in place to keep employees safe - just ask about joining Mayco's Safety Team!*

*Our tag program allows employees to report safety and mechanical issues. You'll find the tag boards all throughout the plant.*



**Q:**

I understand how important timing is on our line, but my team leader has asked me to take a shortcut to cut production time and I don't think the shortcut is safe, should I report this?

**A:**

Yes, report it. Every employee has the right to refuse to do work reasonably perceived to be dangerous. No production goal or time-saving mechanism is worth an injury of any kind.

# OUR SAFETY PLEDGE

“We believe safety is everyone’s responsibility.”



We believe that it is our employees’ right to go home at the end of each workday unharmed and injury free.

We must remind ourselves that safety is a top priority, and no job is so important that we cannot take the necessary time to perform our work safely.

It is our responsibility as management to create an environment which makes this possible.

Mayco International will value personal safety and health above all else.



**Live Well**  
**Work Well**

Mayco promotes health and wellness. Please ask your supervisor, Human Resources, or refer to the benefits guide for physical and behavioral resources.





## QUALITY COMES FIRST

Mayco International could never envision a Code of Conduct without including our commitment to Quality. All employees must understand that at the very heart of business ethics is providing a quality product or service.

The emphasis of our Quality Commitment program is:

- Continuous Improvement
- Defect Prevention
- Reduction of Variation and Waste

### YOUR ROLE

Your role in helping us always meet our Quality Goal is to first adopt a personal commitment to continuous improvement. It is also imperative that you take seriously any training you receive in regards to our quality management system identified as **IATF 16949©**.

Of course, the best way we have of assuring quality products or services is for you to report any discovered defects immediately to your supervisor along with always following the standard work instructions.

*"Quality is not an act. It is a habit."*  
- Aristotle

Mayco International has developed a reputation for quality control. Because of this, we have earned the trust and respect of our customers. We have been able to establish strong relationships with our customers because of our people who are committed to quality, safety and preserving the reputation of Mayco International.





### **Environmental Impacts:**

*Any changes to the environment that results totally or partially from the activities, products or services of an organization.*



# ENVIRONMENTAL COMMITMENT

Mayco International is committed to operate in a way that protects the environment and promotes the sustainable use of natural resources.

**“We believe in meeting the needs of our customers and the needs of our planet.”**

**Nick DeMiro**  
President

We are also committed to exploring opportunities for using sustainable materials in the products we produce wherever safety and economics will allow. Mayco International is committed to protecting all of our natural resources. The Company has adopted **ISO 14001**, a system that invites us to care for and improve our environment, and can assist in the protection of our natural resources and help us create healthy work spaces for all.



## **REDUCE**

and eliminate the generation of waste and emissions at the source.

## **REUSE**

containers and products.

## **RECYCLE**

when it is practical to do so.

# EMPLOYEE RESPONSIBILITIES

We are each responsible for our own compliance with the Code, to report suspected violations, and to cooperate in the company's investigation of potential violations.



Doing the right thing means speaking up. You may not want to tell someone of your feeling that there has been a violation committed because you may not be absolutely sure of your information, or you might be afraid you will “cause trouble”. You may even be afraid someone will “get back” at you for speaking up.

Employees who do speak up with concerns play an important role in maintaining our ethical workplace. You have a responsibility to understand our policies and to speak out when violations occur so that the company can quickly respond with the appropriate action.

It is the responsibility of all to immediately report safety violations, employee harassment, suspected or known theft, or any substance abuse during working hours, or while representing the company in an official capacity.

## PRIVACY OF INDIVIDUALS

Any unauthorized use of private information is prohibited. If you discover the illegal or unauthorized use of private information you should report it to your supervisor.

Supervisors will then inform Human Resources of the breach or perceived breach of privacy and HR will immediately investigate. Anyone whose data may have been compromised will be updated on the severity of the breach and the plan to remedy the breach.

If you do not feel comfortable reporting your suspicions or known violations, you may always report anonymously. Either submit a sealed envelope with your concern to the HR office or email your concern to [maycoethics@maycointernational.com](mailto:maycoethics@maycointernational.com)

If by mail, please address your envelope to:  
Mayco Ethics, 42400 Merrill Rd Sterling Heights, MI 48314.

## NO RETALIATION POLICY

Our company will not retaliate against a person who:

- Reports what he or she believes is a violation of our Code of Conduct, our policies or the law.
- Raises a compliance question or concern or seeks advice about a particular business practice, decision or action.
- Cooperates with investigative efforts in response to a reported or suspected violation.

Whenever you honestly raise a concern over a Code of Conduct violation, or any policy violation, you do not need to fear that you will lose your job or any benefits of your employment. This protection also extends to any truthful participation in any investigation, whether internal or external, related to a perceived or known violation.

If it is discovered that you have participated in a retaliatory deed against another employee for speaking up, you will be disciplined up to and including termination of employment.

*Reporting suspected or known* **VIOLATIONS OF  
ACCOUNTING PRINCIPLES**



It is important that you report any suspected or known violations of Accounting Practices and Internal Controls related to:



• **ACCOUNTING CONTROLS**

**AUDITING PRACTICES** •

• **PROCUREMENT CONTROLS**

**QUALITY CONTROLS** •

• **FIREWALL PROTECTION CONTROLS**

You should report your accounting violation concerns directly to the President at the Merrill Road facility located at 42400 Merrill Road in Sterling Heights, MI 48314. Reports should be face-to-face by scheduling a meeting time with the President at the Merrill Road Facility.

Since these types of allegations often implicate criminal statutes and can substantially harm someone's reputation, it is best that upper management alone deal with this type of violation during face-to-face meetings rather than through correspondences.

# REPORTING CONCERNS HONESTLY

Before a report is made, employees must have a **good faith** belief that the Code of Conduct or other policies have been violated. Filing a report for the sole reason of retaliating against another person, or to gain advantage over another person, or to harass or intimidate is not honest reporting. This type of action is in itself a violation of the Code of Conduct. Because of this, if you feel a report of a violation that personally involves you is false and meant to harm you or your reputation, report this concern immediately when you first hear of the report.

The company has promised to address reported violations and to take corrective action. The action chosen remains at the discretion of the company. If you feel the course of action is unfair or inadequate you may express those concerns in writing directly to the President.

**Q:** Should I gather additional evidence before reporting a suspected violation?

**A:** No. As soon as you have a good faith belief that a violation has occurred, report it. The company will investigate and take the appropriate action.

Our reporting policy ensures that we all have a great, safe and ethical place to work.

**Q:** Will I get in trouble if I report someone on my team who did something unethical? Will he know it was me? I don't want him to get fired, just to stop the behavior. What if I am not 100% sure I saw it right?

**A:** No. You will not get in trouble and you will not be held responsible should the concern be found to be incorrect, as long as the report was made in good faith. Each violation is circumstance specific, and it is the company's general policy to work to correct problems that exist. The company will only dismiss a violator if the gravity of the situation demands it. Most occurrences are handled by making the person aware of the violation and then providing the right tools to avoid future violations.





# REPORTING A CONCERN

**Q:** I have a concern, but it is not an emergency and not specifically covered by the Code of Conduct. Should I bother reporting it?

**A:** Yes. If you feel it is a violation of ethics, report it. If you really are not sure then send your questions to the following email:

[maycoethics@maycointernational.com](mailto:maycoethics@maycointernational.com)

This email has been set up for questions concerning whether or not there really is a violation. Do not expect a response from this email address in less than seven business days. Of course emergency situations or grave violations should be reported immediately to your supervisor or to HR. If you wish to remain anonymous, then simply write this email address on the outside of an envelope, write your concern inside, and submit to HR.

Your first step in reporting a known or suspected violation is to go to your direct supervisor with your concern. If you do not feel comfortable reporting to your own supervisor you may report a suspicion to another supervisor, or directly to the Human Resource Department.

Mayco International has an internal protocol for reporting and escalation of Code of Conduct issues along with specialized investigative procedures.

It is the Company's desire to promptly respond to reports of violations with as little disruption to daily activities as possible, and to respect the privacy rights of all involved to the greatest extent allowed under the circumstances.

## STEP 3

If your concerns still have not been adequately addressed, you can direct concerns to the VP of Operations, Chief of Operations, and President of the company.

## STEP 2

If your concerns are not addressed by your supervisor, submit a written request to Human Resources.

## STEP 1

Contact your immediate supervisor with concerns about policies, rules or questions related to the Code of Conduct.

## CODE OF CONDUCT

### ESCALATION PROCESS:

Emergency situations involving imminent danger should be handled by dialing 911.

# RECEIVING REPORTS OF CODE VIOLATIONS

Mayco International takes violation of the Code seriously, and depending on the circumstances may result in immediate dismissal and reporting to law enforcement if warranted. All disciplinary actions are reviewed to ensure that there is consistency in applying our policies.

Please take advantage of our Open Door Policy. Remember, “an ounce of prevention is worth a pound of cure”. If there is a possibility that an action will result in a violation of the Code, ask first before acting.

## IF YOU ARE A MANAGER OR SUPERVISOR:

- Make sure you know and understand the Code and model your own behavior consistent with the Code.
- Be familiar with the internal protocols for reporting and for internal investigations.
- Act appropriately and in a timely manner to stop violations of the Code, policy or law.
- Let team members know you are available to discuss their concerns.
- Take all reports, questions and concerns seriously.

*“An ounce of prevention is worth a pound of cure.”  
- Benjamin Franklin*

## IF A VIOLATION OF THE CODE IS REPORTED TO YOU:

- Feel free to seek guidance before, during, and after responding to a concern.
- Take appropriate immediate action that may be required to ensure safety, this may include alerting law enforcement.
- Be concerned with privacy concerns for sensitive issues; never assume guilt.
- Raise all concerns to the appropriate level and function in accordance with the Protocol for Reporting and of Code of Conduct Issues.
- Show respect to those who report honestly and give them your support.
- Keep those who report updated so they know they are not being ignored.
- **Do not investigate independently.** Follow the internal protocol so that the investigation is conducted by the proper personnel.
- Ensure that **no retaliation** occurs against someone for reporting a suspected violation.

*Mayco International values*

# LOYALTY

*"Be loyal to those who are not present. In doing so, you build the trust of those who are present."*

*-Stephen Covey*



Sound business depends on trust, and trust depends on loyalty.

Here at Mayco International we value loyalty because we depend on a team approach from concept to completion of our products. Great teamwork depends on standing by one another. This attitude naturally overflows to our customers and our own suppliers. It may be an old-fashioned notion, but we at Mayco International have no interest in being "fair-weather" friends, so we dedicate ourselves to the ideas of allegiance and loyalty.

## RELATING TO ONE ANOTHER

During your employment with us, it is expected and required that you treat all of the people with whom you work with respect and courtesy. We strive to maintain a pleasant working environment free from intimidation, humiliation, and insult. The company will not condone or tolerate conditions of a discriminatory nature. Employees may not engage in conduct toward any other employee which tends to degrade or harass them. Your good judgment in this regard is expected at all times.

Failure to adhere to the company's long-standing corporate policy against discrimination, including harassment, may be grounds for immediate termination.



*And as you wish that others would do to you, do so to them. - Luke 6:31*

It is our belief that our vision and mission here at Mayco International can best be achieved through courteous communication and the maintenance of a professional demeanor. This is our policy and our practice.

We encourage you to freely express issues and concerns on an individual basis with your supervisor or members of management. You can be sure that your questions, comments and concerns will be given full consideration and a timely response. Any request to maintain such communications in confidence will be observed to the fullest extent possible.

# GLOBAL STANDARDS

## GLOBAL HUMAN RIGHTS

Mayco International recognizes basic human rights on a global basis. There are fundamental standards that are designed to protect these basic rights around the world, and we expect our suppliers and affiliated companies that do business around the globe to follow these standards:

## COMPLIANCE WITH U.S LABOR AND EMPLOYMENT LAWS

Our company is committed to full compliance with all applicable labor and employment laws and regulations within the United States. Accordingly, we uphold the following rights and protections as required by federal and state law:

- Prohibition of child labor and strict adherence to legal restrictions concerning the employment of minors, in accordance with the Fair Labor Standards Act (FLSA);
- Compliance with wage and hour laws, including minimum wage, overtime pay, and related compensation standards as established by the FLSA and applicable state laws;
- Enforcement of lawful working hours and overtime compensation for non-exempt employees;
- Strict prohibition of forced labor, human trafficking, and all forms of modern slavery, consistent with the Trafficking Victims Protection Act and applicable criminal statutes;
- Protection of the right to freely associate and engage in collective bargaining as outlined in the National Labor Relations Act (NLRA);
- Prohibition of workplace discrimination and harassment based on legally protected characteristics, in compliance with Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), the Age Discrimination in Employment Act (ADEA), and related federal and state anti-discrimination laws;
- Promotion of equal rights and protections for women in the workplace, including adherence to the Equal Pay Act, the Pregnancy Discrimination Act, and the Family and Medical Leave Act (FMLA).

These standards are minimum legal requirements and form the baseline for our conduct across all operations. Additional company policies may further strengthen these protections in alignment with our values.



## LAWS AND REGULATIONS

Mayco International is an American company with global reach. Because of this, all of our employees and agents must be respectful and follow the laws, policies and customs of wherever they find themselves working. We invite you to seek out information and advice on how to keep our own local laws, and the laws of neighboring countries where we have the privilege to conduct business. When language may be an issue, always seek out reliable interpreters so that errors in communication can be prevented.

Internal policies and rules are also important and may need to change to accommodate changes in circumstances. It is up to our supervisors to timely notify all employees of any changes in policy or procedure that directly affects their employment.

Many rules put into place by the company are made to comply with governmental regulations, and many others are to promote safety in the work place. If you do not understand a policy or work rule, discuss it with your supervisor or Human Resources so they may provide you with the reasoning behind the rule.



## INTERNATIONAL TRADE LAW COMPLIANCE

We are proud to be involved in the global market. This is not possible without strict compliance to international trade laws and regulations. The laws relating to customs are constantly changing and we must be aware and comply with all applicable embargo and boycotts and respectfully deal with the customs requirements of other nations. These may involve strict record keeping, intricate classification systems, monetary valuation considerations, special licensing requirements and a variety of other programs and demands. Many countries have severe penalties for anyone in violation of their trade laws.

If you receive a notice of violation, provide it to upper management immediately. Delays may be disastrous. It is also imperative that proper vetting and background checks of foreign agents be consistently applied. If an agent is suspected of violating laws, regulations, or our own Code of Conduct, it should be immediately reported.

## COMPETITION AND ZERO TOLERANCE FOR COLLUSION

### ***Collusion:***

*Secret or illegal cooperation or conspiracy, especially in order to cheat or deceive others.*

We fully comply with all antitrust and competition laws in the countries where we do business. These laws can be complex. We will endeavor to make sure that our team members understand the limits various laws may impose as bids for work are sought and finalized. Cooperation with our customers depends on a basis of mutual trust and respect and we will not engage in illegal or unethical behavior such as price collusion. Arrangements that have the intent or result in illegally limiting competition are forbidden. We never artificially limit our production or sales volume to use as leverage or gain unfair advantages, and we do not engage in bid rigging.



# ANTI-BRIBERY ANTI-CORRUPTION

# ZERO TOLERANCE FOR ANY ADVANCE

Our company is known and will continue to be known for its honesty and transparency. We rely on the quality of our products, the timeliness of their delivery, our dedication to our customers, and our commitment to cost containment to win jobs and to grow our company here in the States and abroad.

We do not allow lavish or extravagant gifts to be provided or taken under any circumstances to further our business pursuits. We will not receive gifts to provide improper advantage to the giver, nor will we offer gifts to attempt to achieve improper advantage for ourselves.

All such attempts at gift giving in any form should be reported immediately. Supervisors should escalate the report immediately so such behavior will be halted and remedial action taken when required.

**Q:** I have a meeting with a government official and he hinted he loved to attend games at Ford Field, can I offer him an outing?

**A:** No, you must never try to influence a government worker with a gift, even if it was the suggestion or idea of the government worker.

**Q:** If I was going to award a supplier a contract based on the quality and price anyway, would it be okay to accept the trip to Hawaii she offered me when we first began negotiations?

**A:** No, you must never appear to be influenced by a supplier. Mayco employees are not to accept or provide lavish or extravagant gifts under any circumstances.



# ACCURATE *and compliant* RECORD KEEPING

Government regulations require we maintain certain records for certain amounts of time. We are dedicated to this task. If you discover that record keeping is inconsistent, disorganized or being ignored, you must report it. If you come in contact with records that are confidential, it will be your obligation to maintain the confidentiality of those records.

## ELECTRONIC COMMUNICATIONS

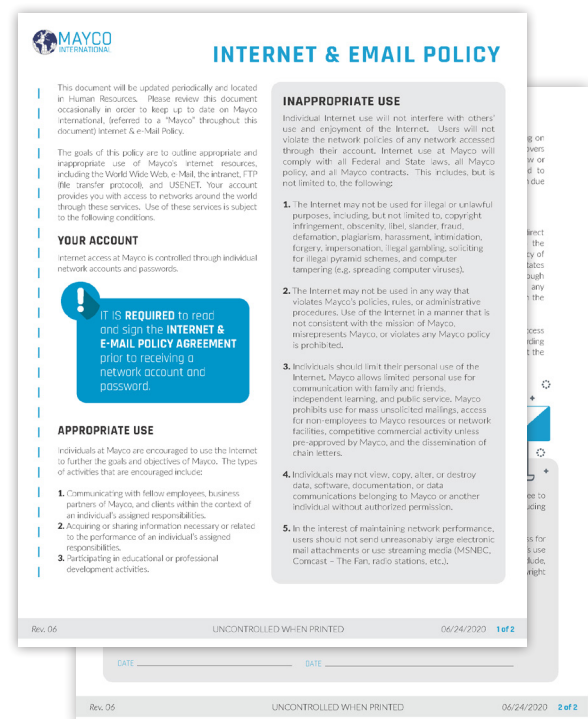
Email correspondences should read like business letters as much as possible, and these records have to be maintained and may have to be used for legal compliance. Refer to our Internet and Email Policy for detailed information on the acceptable use of our communication systems. Do not use your work email for anything but work, and do not make disparaging remarks about customers, fellow workers or suppliers within your emails. Report violations of poor email etiquette.

## CORRECTING ERRORS IN RECORDS

Mistakes happen! If you notice that an error has been made in a record, it should be corrected immediately. To avoid confusion that may arise from a changed record, always include a notation or attachment that memorializes the correction with the following information:

1) The name of the person who noticed the error and has made the correction, 2) The date the correction was made, and most importantly, 3) a short explanation as to the nature of the error and why it required a correction.

Beyond government requirements, our customers also request certain types of records be maintained. We are dedicated to do this in a manner that is organized and reflective of our commitment to our customers.



1. Record the name of the person who noticed the error and has made the correction.
2. The date the correction was made.
3. A short explanation as to the nature of the error and why it required a correction.

# USING COMPANY RESOURCES

## ETHICALLY

Use company resources responsibly in order to avoid economic or environmental waste. If you manage budgets and expenses, or other funds, keep accurate records and look for ways to economize whenever possible.

## SAFELY

Be attentive to security measures and be alert to areas where theft might occur. Immediately report any theft you know of or suspect.

Always use your own ID and password on company computers. Never give this information out to anyone.

Of course you must never use the company resources or assets for any unauthorized purpose. Supervisors must never give their authorization to allow company property or assets to be used for illegal, immoral or unethical activity. Examples of such misuse are:

- If you use company resources to harass, intimidate or to store or distribute illegal or offensive material.
- If you use company computers or company wi-fi networks on your mobile devices to visit offensive internet sites or sites that contain illegal content. Refer to our Social-Media Policy for further instruction of computer use.
- If you use the assets of the company, such as vehicles, in furtherance of improper, unauthorized or illegal purposes.
- If you use company resources to interfere with any other party's intellectual property rights, such as copying and distributing a trademarked item without the proper authorization and permissions.

Violations such as those outlined above should be reported immediately. Such activity may result in employee discipline up to and including termination.

## CONFLICTS OF INTEREST

It is important to understand the necessity of always acting in the Company's best interest. This means avoiding conflicts that put personal interests above company interests. In all business matters, timely disclose possible conflicts of interest. If you ever have a question whether or not a conflict of interest might exist, discuss it with your supervisor or with the Director of Purchasing. Mayco International does not have a strict prohibition policy against personal business referrals, but all decisions of hiring, contracting or purchasing must follow sound business practices.

**Q:**

I saw an associate on a pornographic site and he downloaded files from the site onto his personal USB drive, should I report it?

**A:**

Yes, since there was use of company resources - the computer, internet connection and company time for personal use. This behavior also violated the rule against not using computers to visit offensive sites.



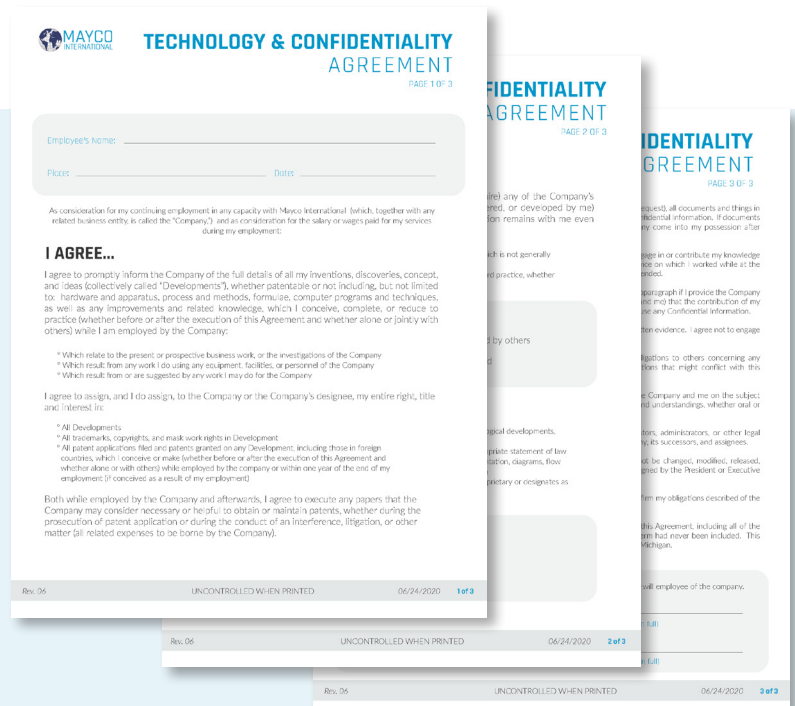
# CONFIDENTIALITY AND TRADEMARK SECRETS

We have a fully developed Confidential Information Policy that can be accessed in the HR office. This subject, however, must be an integral part of our Code of Conduct to highlight the importance of the responsibility all employees have of maintaining confidences within the workplace and when away from the workplace. This duty is not only to Mayco International but also a duty we owe our customers, suppliers, agents and contractors. Whenever you have access to confidential information, it is your duty to keep it private. This duty goes beyond your tenure with Mayco International. Please see our Confidential Information Policy for a detailed explanation of your rights and duties.

You must never remove information via a personal storage device from any of the company's computers without prior authorization. All materials provided to you by the company must be returned if you leave the company.

If you are ever approached to speak or write about the company, you must do so only after written authorization from the President. All requests from media, government inquiries, or civic groups should be passed on to upper management.

- All materials provided to you must be returned if you leave the company.
- All requests from media should be passed to upper management.



## **Confidential Information:**

*Information or material which is not generally available to or used by others.*

*Information of value that is not generally known or recognized as the standard.*

# QUESTIONS?

It is our policy at Mayco International that grievances or reporting of violations of the Code of Conduct or any company policy or procedure should begin with an open and honest conversation with your direct supervisor.

## EMAIL

If you are not satisfied with the response of your supervisor, you may email your concerns to the following address: [maycoethics@maycointernational.com](mailto:maycoethics@maycointernational.com)

## MAIL

If you prefer to anonymously report any concerns, you may by submitting a sealed envelope with your concern to the HR office either in person or by mail. Please address the envelope to: [Mayco Ethics, 42400 Merrill Rd Sterling Heights, MI 48314.](#)

# ACKNOWLEDGMENT

## POLICY CHANGES

Mayco International reserves the right to change, delete or add to this Code or other company policies. The Code of Conduct and policies will be maintained on the company website.

## WAIVERS

The provisions of this Code may not be waived absent a writing specifically acknowledging such a waiver signed by the President and at least one legal advisor.

## ACKNOWLEDGMENT

An acknowledgment of your receipt and understanding of the Code of Conduct and other key Company Policies will be required and this acknowledgment will become a part of your personnel record. Human Resources has the acknowledgment form for the Code and other applicable policies.

# CONCLUSION

Mayco international has offered you this Code to complement your own good judgment. We will remain a vibrant, productive part of the global business community by working together, communicating openly, and demanding integrity and ethical behavior at every level of our business.

Thank you for taking the time and consideration to review the code, and if you have any questions before you sign the acknowledgment, do not hesitate to ask. Notwithstanding any acknowledgment, the company expects complete compliance with this Code of Conduct.

*Welcome to the Mayco family!*



I acknowledge that I have received, read, and understand the Code of Conduct and I have obtained guidance where I had questions and understand where to seek further guidance as the need may arise. I further acknowledge that I was provided with or instructed how to access separate company policies (see attached list) and I have read, understood and agree to comply with the stated provisions of these policies.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_



PASSION TO INNOVATE. POWER TO DELIVER.