

# **REKO INTERNATIONAL GROUP INC.**

## **CODE OF ETHICS AND BUSINESS CONDUCT**

**October 13, 2004**

### **Introduction**

This Code of Ethics and Business Conduct (“Code”) applies to all employees, officers and directors of Reko International Group Inc. and all its subsidiaries (collectively referred to as “employees”), including every one of its business units. Individual business units may add to the Code additional provisions necessary to comply with local legislation.

### **General Statement of Business Philosophy**

Reko International Group Inc. is committed to:

- Complete internal and external customer satisfaction
- High quality and continuous improvement
- High standards of safety and housekeeping
- A high tech environment for the metal cutting industry
- Continuous education to ensure the intellectual and financial growth of each employee
- Ongoing effort to be involved in the interests of the community

The Code has been developed to assist employees and Reko to conduct its business in an open, honest, ethical and principled manner.

It is our desire to uphold ethical standards in all our corporate activities.

**We do not knowingly support any public or private organization that espouses discriminatory policies or practices. We require all our employees to perform their work with honesty, truthfulness and integrity.**

**Reko International Group’s policy is to comply with all applicable laws, including, without limitation, employment, discrimination, health, safety, competition and securities laws. No employee has authority to violate any law or to direct another employee to violate any law on behalf of Reko International Group Inc.**

Each employee must comply with this Code. Employees should direct any related questions to his or her immediate supervisor, a Human Resources representative, a member of the Audit Committee of the Board of Directors, or the Company

Secretary. If an employee becomes aware that another employee has violated this Code or any applicable laws, rules or regulations, he or she must report the violation in accordance with procedures set forth in the applicable policies and procedures manuals. Reko International Group Inc. prohibits retaliation against an employee who, in good faith, reports a possible violation. Such retaliation, in itself, constitutes a violation of this Code. Failure to comply with any of the provisions of this Code, or the existing policies and procedure manuals as they may be supplemented and amended from time to time, subjects the employee to disciplinary measures up to and including termination.

### **Waivers**

The Audit Committee, at its sole discretion may choose to waive disciplinary action in response to non-compliance with the Code. Reko International Group Inc. promptly will disclose any such waivers granted to any of its executive officers, senior financial officers or directors as required under applicable law and regulations.