DURA







CODE OF CONDUCT

DOING THE RIGHT THING, THE RIGHT WAY, FOR THE RIGHT REASONS.



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DOING THE RIGHT THINGS

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OUR RESPONSIBILITIES





Our success is driven, in large part, by the perception and value of the DURA brand. Our reputation is essential to DURA's positive brand perception as a trustworthy and ethical company among customers, employees and within the communities in which we live and serve.

To achieve this, we must maintain a high-caliber workforce that continuously holds itself to the highest standards. The DURA Code of Conduct is designed to support our efforts and guide our performance to meet the highest ethical standards within the workplace. It is our responsibility to understand and act upon the Code of Conduct as we operate our business day to day.

Our collective ability to model our high-performance culture traits, including a commitment to behavior beyond reproach, is key to our customer experience, brand perception, and financial performance.

Thank you for contributing to the legacy of integrity we aspire to at DURA.



OUR CORE VALUES — INTRODUCTION

DURA Automotive Systems, LLC ("DURA") is built upon a foundation of strong *corporate values* and business practices. We are fully committed to serving our customers and employing individuals with personal standards consistent with that of our company standards: integrity, professionalism and a commitment to **D**riving **U**rgency, **R**esults and **A**ccountability. Our Code of Business Conduct and Ethics is designed to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely, and understandable disclosures in reports and documents we file with regulatory agencies and in our other public communications;
- Compliance with applicable laws, rules, and regulations;
- Prompt internal reporting of violations of this Code; and
- Accountability for adherence to this Code.

Our Code applies to all directors, officers, and employees of the Company and its subsidiaries. Agents and contractors of the Company are also expected to read, understand, and abide by this Code.

This Code should help guide your conduct in the course of our business. Many of the principles described in this Code are, however, general in nature, and the Code does not cover every situation that may arise. Use common sense and good judgment in applying this Code. This Code is not the exclusive source of guidance and information regarding the conduct of our business. You should consult applicable policies and procedures in specific areas as they apply.

Do not hesitate to ask questions about whether any conduct may violate the Code, voice concerns, or clarify gray areas. In addition, you should be alert to possible violations of the code by others and report suspected violations, without fear of any form of retaliation.

Violations of the code will not be tolerated. Any employee who violates the standards in the Code may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.



OUR RESPONSIBILITIES

As a DURA employee, you are expected to comply with both the letter and the spirit of the Code. This means you must understand and comply with all of our policies, laws and regulations that apply to your job, even if you feel pressured to do otherwise. The DURA Code also requires you to seek guidance if you have questions or concerns and to cooperate fully in any investigation of suspected violations of the Code that may arise in the course of your employment.

Periodically, you may be asked to provide a written certification that you have reviewed and understand DURA's Code of Conduct, comply with its standards, and are not personally aware of any violations of the Code by others. This certification is your pledge to live up to our Code and its expectations and to promptly raise concerns about any situation that you think may violate our Code. Employees who violate our Code put themselves, fellow employees, and our company at risk (up to and including legal and criminal liability) and are subject to disciplinary action up to and including termination of employment.

DURA employees who supervise others have an important responsibility to lead by example and maintain the highest standards of behavior. If you supervise others, you should create an environment where employees understand their responsibilities and feel comfortable raising issues and concerns without fear of retaliation.

If an issue is raised, you must take prompt action to address the concerns and correct problems that arise. You must also make sure that each employee under your supervision understands our Code and the policies, laws and regulations that affect our workplace. Most importantly, you must ensure that employees understand that business performance is never more important than ethical business conduct.



MAKING GOOD DECISIONS

Recognizing ethical issues and doing the right thing in all DURA business activities is your responsibility. When engaging in business activities for the firm, consider the following:

WE BELIEVE IN DOING THE RIGHT THING, THE RIGHT WAY, FOR THE RIGHT REASONS.

- What feels right or wrong about the planned action?
- Is the planned action consistent with the Code and Company policies?
- How will the planned action appear to your manager, the ELT, the CEO, or the general public?
- Would another person's input help to evaluate the planned action?

ASKING QUESTIONS & REPORTING CONCERNS

You are obligated to report violations of the Code, the law, or any other company policy or procedure.

If you have questions, concerns, or need to report a known or suspected violation, you should discuss it with your supervisor, any member of your management team, a Human Resources representative or contact the Ethics & Compliance Helpline where you can report your concern confidentially or anonymously.

You may be subject to discipline, up to and including termination, for your failure to do so. Conversely, maliciously false or ungrounded accusations of misconduct could in themselves violate the Code.





PROTECTING OUR PEOPLE





BASIC HUMAN RIGHTS

The Company respects and observes internationally proclaimed human rights for all of its employees and workers such as, but not limited to, the International Bill of Human Rights; the Core Conventions of the International Labor Organization: Conventions numbers 29, 87, 98, 100, 105, 111, 138 and 182; International Labor Organization/ Declaration on Fundamental Principles and Rights at Work; Article 32 of the UN Convention on the Rights of the Child; OECD Guidelines for Multinational Enterprises; and, the UNGC Guiding Principles on Business and Human Rights.

WAGES, BENEFITS, AND WORKING HOURS

We provide compensation and benefits that comply with applicable local laws, including those relating to minimum wages, overtime compensation, and legally mandated benefits, and comply with local laws regarding working hours, including overtime.

FORCED OR COMPULSORY LABOR

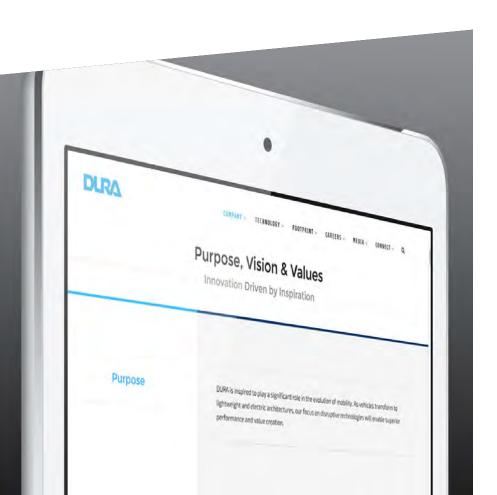
Any form of forced or compulsory labor, including debt bondage, indentured labor, slavery, prison labor and human trafficking is strictly prohibited. This prohibition extends but is not limited to transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, deception, abduction or fraud for labor or services.

CHILD LABOR AND YOUNG WORKERS

We do not and will not tolerate or condone child labor in any form, and the age of employment for young workers must meet or exceed company guidelines, legal regulations and local labor laws. Further, young workers are not permitted to perform or conduct any hazardous work, night time or overtime work, or work that is inconsistent with the young worker's personal development including development relating to their health or physical, mental, or social development. DURA supports the use of only legitimate workplace apprenticeship and student learning programs, which comply with all applicable laws and regulations, and the best interests of the young worker is DURA's primary consideration.

COMMITMENT TO NON-RETALIATION

We believe it is essential to create an environment in which individuals feel able to raise any matters of genuine concern internally without fear of disciplinary action being taken against them, that they will be taken seriously, and that the matters will be investigated appropriately and, as far as practicable, be kept confidential. DURA prohibits retaliation, in any form, against anyone who, in good faith, reports violations or suspected violations of this Code, company policy, or applicable law, or who assists in the investigation of a reported violation. Acts of retaliation should be reported immediately to your manager. Individuals who take action against a person for making a report or participating in an investigation in good faith will be subject to disciplinary action, up to and including termination, as local law permits.



FREEDOM OF ASSOCIATION

We respect employee rights to associate freely, to join or not join labor unions, bargain collectively, seek representation, and join workers' councils in accordance with local laws.

REPORTING CHANNELS

If you think that an actual or possible violation has occurred, it's important to report your concerns immediately to your supervisor, the HR department, the Ethics & Compliance Hotline, or the Legal Department. You are encouraged to identify yourself when reporting a possible violation and the Company will make every effort to protect your identity if you do so.

You may, however, report a suspected violation anonymously by calling the *Ethics & Compliance Helpline at 1 (888) 310-6801 within* the United States, or 1 (760) 613-6376 if you are outside of the U.S.

DISCRIMINATION

Having a diverse workforce--made up of team members who bring a wide variety of skills, abilities, experiences and perspectives--is essential to our success. We are committed to the principles of equal employment opportunity, inclusion and respect. DURA does not tolerate discrimination against anyone--team members, customers, business partners or other stakeholders--on the basis of race, color, religion, national origin, sex (including pregnancy), age, disability, HIV status, sexual orientation, gender identity, marital status, past or present military service or any other status protected by the laws or regulations in the locations where we operate. We comply with laws regarding employment of immigrants and noncitizens and provide equal employment opportunity to everyone who is legally authorized to work in the applicable country. We provide reasonable accommodations to individuals with disabilities and remove any artificial barriers to success. DURA employees should report suspected discrimination right away and never retaliate against anyone who raises a good faith belief that unlawful discrimination has occurred.

HARASSMENT

Our company is committed to providing a work environment free of all forms of harassment, including but not limited to sexual harassment, which includes:

- Any unwelcome behavior, such as verbal or physical conduct designed to threaten, intimidate or coerce;
- Verbal taunting (including racial and ethnic slurs, inappropriate jokes or language);
- Negative stereotyping; and
- Unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature in which submission to the conduct is either an explicit or implicit term or condition of employment; or submission to or rejection of the conduct is used as the basis for making employment decisions.

If you believe you are being harassed, or if you have witnessed harassment of a colleague, you need to report this to your manager, another manager, or Human Resources. DURA will act promptly to investigate your concern and directly address the issue with the individuals involved. We recognize the sensitive nature of these claims and will work to ensure confidential treatment of the allegations in order to protect all involved. DURA has zero tolerance for retaliation of any kind against employees who report a harassment claim in good faith.

WORKPLACE SAFETY & VIOLENCE PREVENTION

DURA strives to provide a safe and healthy workplace for employees, customers and visitors to its premises. All managers have responsibility for ensuring proper safety and health conditions for their employees. Our management is committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene, ergonomics and safety. To support this commitment, employees are responsible for observing all safety and health rules, practices and laws that apply to their jobs, and for taking precautions necessary to protect themselves, their co-workers and

visitors. Employees are also responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions to their supervisor. Threats, acts of violence and physical intimidation are strictly prohibited. Possession of weapons on the job or on DURA premises is prohibited, unless permitted by law. No talk of violence or joking about violence will be tolerated. As is the case with any violation of the Code, employees have a responsibility to report any unsafe behavior or condition regardless of whether they are directly involved.

SUBSTANCE ABUSE

DURA requires its employees to work free from the influence of any substance, including drugs and alcohol, that could prevent them from conducting work activities safely and effectively. Our company reserves the right to have any employee tested if there is reasonable suspicion that he or she is under the influence of drugs or alcohol. If you are using prescription or non-prescription drugs that may impair alertness or judgment, or witness an employee impaired and therefore possibly jeopardizing the safety of others or DURA's business interests, you should report it immediately. If you have a problem related to alcohol or drugs, you are encouraged to seek assistance from the Employee Assistance Program or other qualified professionals and review the DURA Substance Abuse Policy.



EMPLOYEE INFORMATION PRIVACY

DURA respects the confidentiality of the personal information of employees. This includes employee medical and personnel records. Access to personal information is only authorized when there is a legitimate and lawful reason, and access is only granted to appropriate personnel. Requests for confidential employee information from anyone outside our company under any circumstances must be approved in accordance with our policies. It is important to remember,

however, that employees should have no expectation of privacy with regard to normal course workplace communication or any personal property brought onto DURA premises or used for DURA business.



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DOING THE RIGHT THINGS





ANTITRUST & FAIR COMPETITION

It is our policy that all directors, officers, and employees comply with antitrust and competition laws. International, U.S. federal and state antitrust and competition laws prohibit efforts and actions to restrain or limit competition between companies that otherwise would be competing for business in the marketplace.

You must be particularly careful when you interact with any employees or representatives of DURA's competitors. You should use extreme care to avoid any improper discussions with our competitors, especially



at trade association meetings or other industry or trade events where competitors may interact. Under no circumstances should you discuss customers, prospects, pricing, or other business terms with any employees or representatives of our competitors.

If you are not careful, you could find that you have violated antitrust and competition laws if you discuss or make an agreement with a competitor regarding:

- Prices or pricing strategy,
- Discounts,
- Terms of our customer relationships,
- Sales policies,
- Marketing plans,
- Customer selection,
- Allocating customers or market areas, or
- Contract terms and contracting strategies.

Agreements with competitors do not need to be written in order to violate applicable antitrust and competition laws. Informal, verbal, or implicit understandings, i.e., knowing winks, are also violations. Antitrust violations in the U.S. may be prosecuted criminally as felonies and can result in severe penalties for DURA and any participating employees.

SELECTION & USE OF THIRD PARTIES/PROCUREMENT (FAIR PURCHASING)

We believe in doing business with third parties that embrace and demonstrate high principles of ethical business behavior. We rely on suppliers, contractors, and consultants to help us accomplish our goals. They are part of the DURA team and should be treated according to our values. To create an environment where our suppliers, contractors, and consultants have an incentive to work with DURA, they must be confident that they will be treated in an ethical manner. We offer fair opportunities for prospective third parties to compete for our business. The manner in which we select our suppliers and the character of the suppliers we select reflect on the way we conduct business.

ANTI-CORRUPTION / ANTI-BRIBERY

The United States and many other countries have laws that prohibit bribery, kickbacks, and other improper payments. No DURA employee, officer, agent, or independent contractor acting on our behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money, or promises) to influence or induce action, or to secure an improper advantage.

The Foreign Corrupt Practices Act or FCPA (and other U.S. laws), the U.K. Anti-Bribery Act, and the OECD Anti-Bribery Convention, among other international laws and treaties, prohibit payment of any money or anything of value to a foreign official, foreign political party (or official thereof), or any candidate for foreign political office for the purposes of obtaining, retaining or directing of business. We expect all employees, officers, agents, and independent contractors acting on behalf of DURA to strictly abide by these laws. (Note: while the FCPA allows for "facilitation payments" (also known as "grease payments")

- small fees to expedite customs and shipping approvals, and similar ministerial governmental actions – such payments are not allowed under the U.K. Anti-Bribery Act. Please check with your manager and Legal before authorizing any facilitation payments.)



TRADE COMPLIANCE (EXPORT/IMPORT CONTROL)

We comply with all United States federal import and export laws and regulations. These laws restrict transfers, exports, and sales of products or technical data from the United States to certain prescribed countries and persons as well as re-export of certain such items from one non-U.S. location to another. Many countries in which we operate have similar laws and regulations. If you are involved in importing and exporting goods and data, you are responsible for knowing and following these laws.



GIFTS & ENTERTAINMENT

Gifts and entertainment can create goodwill in our business relationships, but can also make it hard to be objective about the person providing them. Our choice of suppliers, vendors and partners must be based on objective factors like cost, quality, value, service and ability to deliver. We must avoid even the appearance of making business decisions based on gifts received through these relationships. Giving or accepting gifts of nominal value (less than \$50 from one source) are acceptable unless your ELT member establishes a lower value threshold for your functional group. Infrequent business

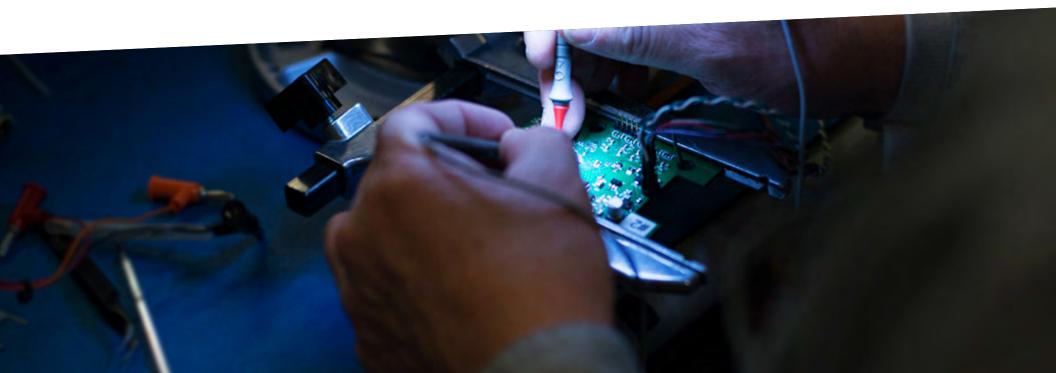
entertainment is appropriate provided it isn't excessive and does not create the appearance of impropriety. When giving gifts or offering to entertain a business partner, be certain that your offer does not violate the recipient's own policies. If you work with public officials, be aware that even simple offers such as purchasing a meal or refreshments may be unacceptable or even against the law. Contact the Legal Department before providing any gift or entertainment to a public official.

AVOIDING CONFLICTS OF INTEREST

We all have an obligation to make sound business decisions in the best interests of DURA without the influence of personal interests or gain. DURA requires you to avoid any conflict, or even the appearance of a conflict, between your personal interests and the interests of our company. A conflict exists when your interests, duties, obligations or activities, or those of a family member are, or may be, in conflict or incompatible with the interests of DURA.

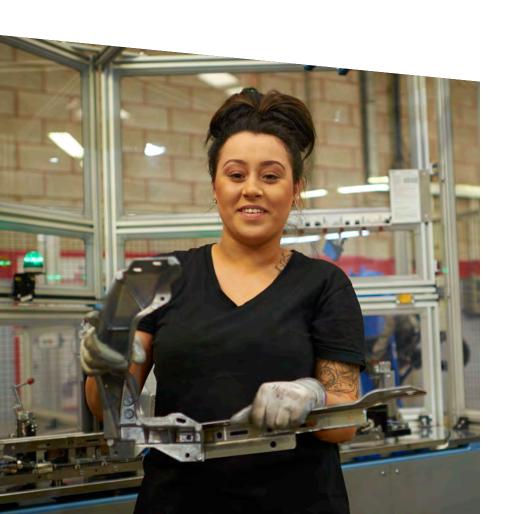
Conflicts of interest expose our personal judgment and that of our company to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us. Should any business or personal conflict of interest arise, or even appear to arise,

you should disclose it immediately to leadership for review. In some instances, disclosure may not be sufficient and we may require that the conduct be stopped or that actions taken be reversed where possible. As it is impossible to describe every potential conflict, we rely on you to exercise sound judgment, to seek advice when appropriate, and to adhere to the highest standards of integrity.



RELATIONSHIPS WITH REGULATORS

Given the highly regulated environment in which we operate, we must be vigilant in meeting our responsibilities to comply with relevant laws and regulations. We expect full cooperation of our employees with our regulators and to respond to their requests for information in an appropriate and timely manner. We should be alert to any changes in the law or new requirements that may affect our business unit, and be aware that new products or services may be subject to special legal and/or regulatory requirements. If we become aware of any significant regulatory or legal concerns, we must bring them to the attention of our supervisor, manager, or the Legal Department. We are committed to maintaining an open, constructive and professional relationship with regulators on matters of regulatory policy, submissions, compliance, and product performance.



COMMUNICATING WITH EXTERNAL PARTIES

No DURA employees (including executives) are authorized to speak with the media, investors, and analysts on behalf of our company unless expressly authorized by our CEO. Unless authorized, do not give the impression that you are speaking on behalf of DURA in any communication that may become public. This includes posts to online forums, social media sites, blogs, chat rooms, and bulletin boards.

This policy also applies to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services.

SOCIAL RESPONSIBILITY

We pride ourselves on being a company that operates with integrity, makes good choices, and does the right thing in every aspect of our business. We will continually challenge ourselves to define what being a responsible company means to us, and work to translate our definition into behavior and improvements at DURA. We seek to align our social and environmental efforts with our business goals and continue to develop both qualitative and quantitative metrics to assess our progress.

ENVIRONMENTAL STEWARDSHIP

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. We use energy wisely and efficiently and employ technology to minimize any risk of environmental impact. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that DURA business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

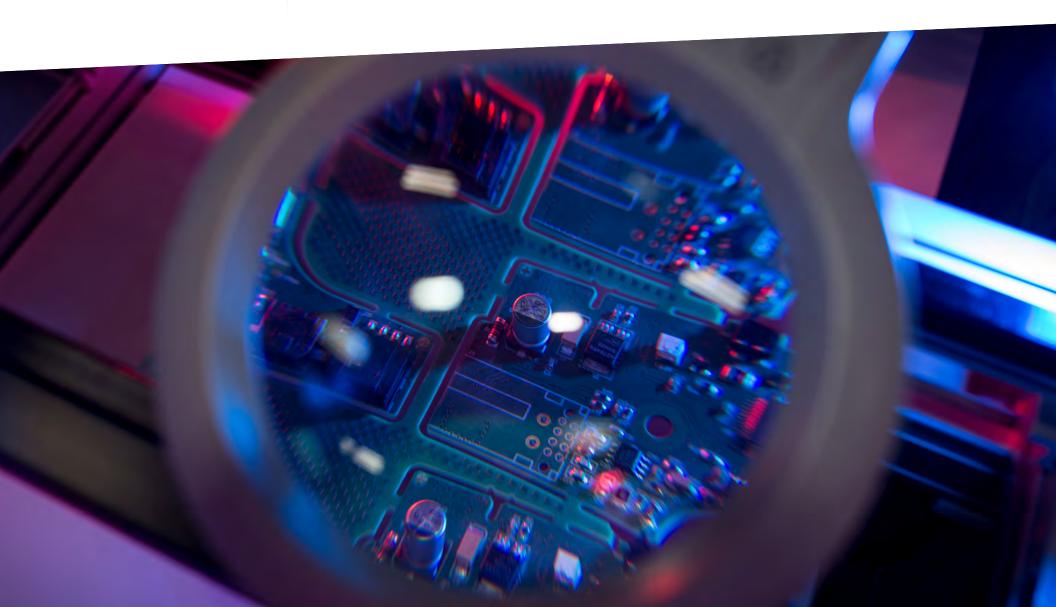






PROTECTING OUR FUTURE





PROPRIETARY & CONFIDENTIAL INFORMATION

One of our most important assets is our confidential information. As an employee of DURA, you may learn of information about our company that is confidential and proprietary. You also may learn of information before it is released to the general public.

Employees who have received or have access to confidential information should take care to keep this information confidential. Confidential information includes any non-public information that might be of use to competitors or harmful to DURA or its customers if disclosed, such as business, marketing and service plans, financial information and forecasts, product architecture, source codes, engineering and manufacturing ideas, designs, databases, customer lists, pricing strategies, personnel data, personally identifiable information pertaining to our employees, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers), and similar types of information provided to us by our customers, suppliers and partners.

You are expected to keep confidential and proprietary information confidential unless and until that information is released to the public through approved channels (usually through a press release, or a formal communication from a member of senior management). Every employee has a duty to refrain from disclosing to any person confidential or proprietary information about DURA, our suppliers, our customers or any other confidential information acquired as a DURA employee, until that information is disclosed to the public through approved channels. You should also take care not to accidentally disclose confidential information.

Materials that contain confidential information, such as memos, notebooks, computer disks and laptop computers, should be stored securely. Unauthorized posting or discussion of any information concerning our business, information or prospects on the Internet or social media is prohibited. Do not discuss confidential DURA business matters in any "chat room," regardless of whether you use your own name or a pseudonym.

All company emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of DURA, except where required for legitimate business purposes.



INTELLECTUAL PROPERTY & PROTECTING IP

DURA intellectual property is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties.

Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights.

We also respect the intellectual property belonging to third parties. It is our policy to not knowingly infringe upon the intellectual property rights of others. For more information about protection of DURA IP and patents, please see DURA Policy 4.05.



PHYSICAL ASSETS & RESOURCES

All employees must protect DURA's company assets, such as equipment, inventory, supplies, cash, and information. Treat company assets with the same care you would if they were your own. Use our company resources only to conduct company business. Theft, fraud or embezzlement, or misuse of company property is a violation of the Code and may result in serious disciplinary action, up to and including termination, and potential referral to prosecuting authorities.

PROPER USE OF ELECTRONIC MEDIA

Our company uses global electronic communications and resources for many business activities. However, they can present risks. Therefore, it is essential that electronic resources used to perform company business are protected to ensure that these resources are accessible for business purposes and operated in a cost-effective manner, that our company's reputation is protected, and that we minimize the potential for legal risk.

EMPLOYEE RESPONSIBILITIES

To enable us to do our job, DURA provides employees with access to Electronic Media such as telephones, fax machines, personal computers, data storage units or thumb drives, e-mail, voice mail, and pagers. Each of us has a responsibility to protect these systems – and the data that is contained on them – from misuse, improper access, damage, and theft. Even when use of DURA's electronic media for limited personal purposes is permitted, such use is not private. Anything sent or received using our company's electronic media may be reviewed by DURA and others at its discretion and direction.

Remember: be just as careful and professional with electronic media such as e-mails, instant and text messaging, and other similar forms of communication as you would when writing a formal letter.

- Never use electronic media to initiate, save, or send items that are hostile, harassing, offensive, threatening, or otherwise inappropriate.
- Do not use electronic media to initiate, save, or send chain letters or other widespread non-business distributions.
- Do not use electronic media to initiate or participate in any malicious, unauthorized, or fraudulent use of company resources.
- Think before you use DURA's electronic media for non-business purposes and comply with the policies of your business unit.

Remember: The unauthorized transmission of company data, access to inappropriate internet sites, and the transmission of inappropriate e-mails are examples of misuse of technology.

EXAMPLES OF INAPPROPRIATE COMPUTER USE

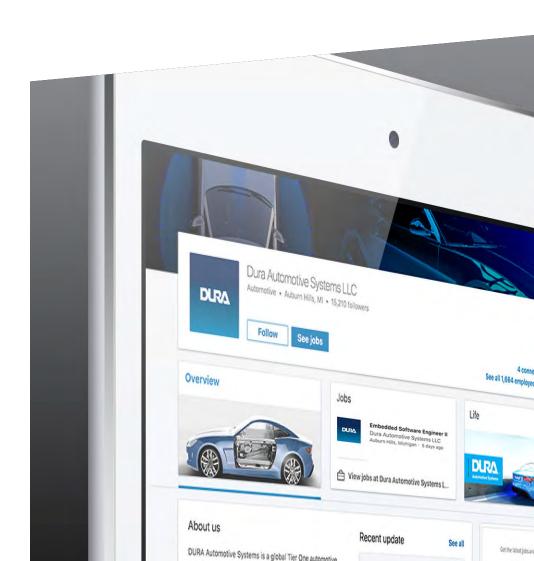
Use of DURA networks is both a necessity and a privilege. If you have access to our information systems and computer networks, you are responsible for using the highest standards of behavior in all of your usage and communications. When you access DURA networks from remote locations (for example, at home or from other noncompany locations), you are subject to the same standards of use as employees who access our networks while on company premises. Our networks and information systems are for legitimate company-related business purposes. Limited personal use may be acceptable if it is authorized by your work location and does not interfere with your job responsibilities. Do not use DURA's networks for any of the following:

- Accessing third party personal e-mail services
- Sending or receiving personal instant messages
- Posting non-business messages to Internet discussion groups and bulletin boards
- Soliciting for commercial, charitable, religious or political causes
- Sending chain mail letters or broadcasting personal messages
- Sending inappropriate, offensive or disruptive messages
- Gaining unauthorized access to databases or information sources at DURA or any other site
- Damaging computer equipment, software or data
- Interfering with or disrupting network users, services or equipment.

SOCIAL MEDIA

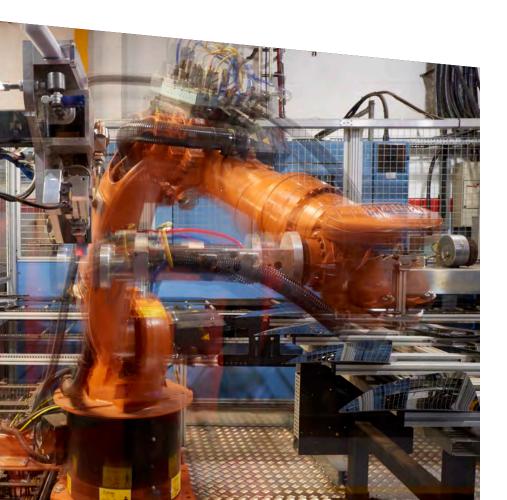
Social media is of growing importance in the marketplace. It enables us to learn from and share information with our stakeholders, as well as communicate with the public about our company. In addition to

following all company policies, a general rule to remember when utilizing social media is to think about the effect of statements that you make. Keep in mind that these transmissions are permanent and easily transferable, and can affect our company's reputation and relationships with coworkers and customers. When using social media tools like blogs, Facebook, Twitter or wikis, do not claim to make comments on behalf of DURA (or that could be viewed as company statements). Remember: at all times, do not disclose confidential or proprietary information about DURA or our employees, suppliers and customers.



MAINTAIN ACCURATE FINANCIAL RECORDS / INTERNAL ACCOUNTING CONTROLS

Accurate and reliable records are crucial to our business. DURA is committed to maintaining accurate company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities.



We are responsible for helping ensure that the information we record, process, and analyze is accurate, and recorded in accordance with applicable legal or accounting principles. We also need to ensure that it is made secure and readily available to those with a need to know the information on a timely basis. Company records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business. All company records must be complete, accurate, and reliable in all material respects. There is never a reason to make false or misleading entries. Undisclosed or unrecorded funds, payments, or receipts are inconsistent with our business practices and are prohibited.



CONCLUSION

Thank you for taking the time to review the DURA Code of Conduct. As a company, DURA prides itself in doing the right thing, at the right time, in the right place, for the right reasons. Whether you are an employee, executive, supplier, agent or consultant, we hope you will find this Code a helpful guide for how to conduct business – the right way – at DURA.