

STRATTEC SECURITY CORPORATION

CODE OF BUSINESS ETHICS

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(as amended effective May 17, 2016)

STRATTEC SECURITY CORPORATION (together with its subsidiaries, "STRATTEC" or "STRATTEC SECURITY CORPORATION") maintains a reputation for integrity and honesty, and for acting in good faith in all of its dealings. This reputation has been established over the years by the responsible conduct of every employee of STRATTEC SECURITY CORPORATION.

STRATTEC and its Board of Directors have adopted this Code in order to:

- promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- promote full, fair, accurate, timely and understandable disclosure in reports and documents that STRATTEC files with, or submits to, the Securities and Exchange Commission (the "SEC") and in other public communications made by STRATTEC;
- promote compliance with applicable governmental laws, rules and regulations;
- promote the protection of STRATTEC assets, including corporate opportunities and confidential information;
- promote fair dealing practices and deter wrongdoing; and
- ensure accountability for adherence to this Code.

The STRATTEC SECURITY CORPORATION Code of Business Ethics captures in written form those ethical principles that we have always followed in the conduct of our business. In that sense it introduces no new standards of responsible conduct. This Code provides a clear statement of policy that all STRATTEC employees should follow. It is also applicable to STRATTEC SECURITY CORPORATION's non-employee directors. The Code does not cover every issue that may arise, but it sets out the basic principles to guide all STRATTEC employees. If a law conflicts with a policy in this Code, you must comply with the law.

STRATTEC SECURITY CORPORATION's Code of Business Ethics will be rigorously enforced. Any STRATTEC employee who violates the Code is subject to disciplinary action and possible discharge.

The following general ethical principles apply to all STRATTEC employees:

- Employees must always conduct all aspects of STRATTEC's business in an ethical and legal manner.
- All employees should actively promote honest and ethical conduct both within and outside of STRATTEC, including the ethical handling of actual or apparent conflicts of interest.
- Any employee in a supervisory role is responsible for the conduct of employees reporting to him or her.
- The conduct of each employee with customers, distributors, the general public, the media and other employees must reflect the highest standards of honesty, integrity and fairness.
- STRATTEC employees must always cooperate fully in any investigation of misconduct.

1. Conflicts of Interest must be Avoided.

Your conduct in the performance of your duties for STRATTEC must be honest and ethical, including the ethical handling of actual or apparent conflicts of interest between personal and professional interests. A "conflict of interest" exists when a person's private interest (or the interest of a member of his or her family) interferes, or appears to interfere, in any way with the interests of STRATTEC SECURITY CORPORATION. You should not engage in any act that might result in a conflict (or even the appearance of a conflict) between STRATTEC SECURITY CORPORATION's interests and your own or another person's or organization's interests. You should also be free from any interest or influence that would make it difficult to give STRATTEC SECURITY CORPORATION your best efforts and undivided attention. For example, there may be a conflict of interest if you:

- cause STRATTEC to engage in a business transaction with your relatives or friends;
- use non-public STRATTEC, customer or supplier information for personal gain by you, relatives or friends (including securities transactions based on such information); or
- compete or prepare to compete with STRATTEC while still employed by STRATTEC.

Because it is impossible to describe every potential conflict, STRATTEC necessarily relies on your commitment to exercise sound judgment, to seek advice when appropriate and to adhere to the highest ethical standards in the conduct of your professional and personal affairs. If you have concerns or questions about any situation, follow the steps outlined under the heading "Reporting Violations" below.

Directors and executive officers of STRATTEC must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from STRATTEC's Audit Committee.

2. Business Opportunities belong to STRATTEC SECURITY CORPORATION.

You should not take advantage or allow others to take advantage of any business opportunity which STRATTEC SECURITY CORPORATION has (or can reasonably be expected to have) an interest. Business opportunities of STRATTEC SECURITY CORPORATION include any opportunity discovered through the use of STRATTEC property, information or position.

3. Outside Work is Permitted but with Limitations.

You may do a limited amount of work for outside organizations on your own time if this work does not interfere in any way with the effective performance of your STRATTEC SECURITY CORPORATION job. However, the other organizations must not have business dealings with or compete with STRATTEC SECURITY CORPORATION, and your outside work must not be harmful to STRATTEC SECURITY CORPORATION's interests or reputation.

4. Ownership of Outside Organizations is Restricted.

Unless approved in advance by the Board of Directors of STRATTEC SECURITY CORPORATION, you may not own (directly or indirectly) any interest in an outside organization or serve as a director of that organization, if it competes in any way with STRATTEC SECURITY CORPORATION or has (or is likely to have) dealings with STRATTEC SECURITY CORPORATION. However, you may own up to one percent (1%) of the shares of any public corporation regardless of its business dealings or competitive relationship with STRATTEC SECURITY CORPORATION.

5. Accepting Payments, Gifts or Special Consideration from Outside Organizations is Prohibited.

You may not accept any payment or other consideration from an outside organization in connection with your STRATTEC SECURITY CORPORATION job. You may not accept any gift having more than nominal value or a loan other than a normal bank loan from any such organization. You must avoid even the appearance of impropriety in any situation involving a supplier, customer or other organization that currently has (or is likely to have) business dealings with STRATTEC SECURITY CORPORATION. Gifts may be accepted when permitted under applicable law if they are (1) noncash gifts

of nominal value (less than \$50) or (2) customary and reasonable meals and entertainment at which the giver is present, such as the occasional business meal or sporting event. If you have any questions about the appropriateness of accepting a gift or invitation, you should discuss it with your supervisor or STRATTEC's Chief Financial Officer before acceptance.

6. Improper Payments to Customers and Suppliers are Prohibited.

You must not be involved in any way with making any improper payment or offering any improper inducement to current (or likely) customers and suppliers, other business organizations or U.S. or foreign government agencies for the purpose of obtaining business or other advantages. This prohibition applies to activities such as offering bribes or kickbacks, paying excessive commissions or fees and providing inappropriate gifts or entertainment in connection with any STRATTEC SECURITY CORPORATION business.

The U.S. Foreign Corrupt Practices Act (the "FCPA") prohibits making a bribe to a foreign government official, foreign political party, party official or candidate for foreign political office for the purpose of obtaining, retaining or directing business to STRATTEC. Under the FCPA, it is unlawful, except under very limited circumstances, for STRATTEC or any of its employees or representatives to give money or anything else of value to a foreign official to obtain, retain or direct business to STRATTEC. It is strictly prohibited for STRATTEC employees to make illegal payments to government officials of any country.

7. Political Contributions on Behalf of STRATTEC SECURITY CORPORATION are Restricted.

No STRATTEC SECURITY CORPORATION funds may be used for making contributions of any kind to any political organization or candidate or holder of any federal, state or local government office unless the contributions have been approved by STRATTEC SECURITY CORPORATION's Chief Financial Officer. As a private citizen you should, if you desire, vote and participate in governmental activities, but you should not use the name of STRATTEC SECURITY CORPORATION in connection with these activities and you should not engage in any lobbying activities on behalf of STRATTEC. You may not work on a political fundraiser or other campaign activity while at work or use company property for these activities.

8. Corporate Assets are Intended for Corporate Purposes.

STRATTEC SECURITY CORPORATION's assets and the services of STRATTEC SECURITY CORPORATION's personnel are intended to be used

only for STRATTEC SECURITY CORPORATION's business purposes. You may not remove, loan, give, sell or otherwise dispose of any equipment, tools, materials, supplies or other property owned by STRATTEC SECURITY CORPORATION without proper authorization.

Misappropriation of corporate assets is a breach of your duty to STRATTEC SECURITY CORPORATION and may constitute an act of fraud against STRATTEC SECURITY CORPORATION. Similarly, carelessness or waste in regard to corporate assets is also a breach of your duty to STRATTEC SECURITY CORPORATION.

STRATTEC SECURITY CORPORATION's electronic communications systems may not be used to access or post material that is:

- pornographic, obscene, sexually-related, profane or otherwise offensive;
- is intimidating or hostile; or
- violates STRATTEC SECURITY CORPORATION policies or any laws or regulations.

Employees may make limited non-business use of STRATTEC's electronic communications systems, provided that such use:

- is occasional;
- does not interfere with the employee's responsibilities;
- does not diminish productivity; and
- does not violate this Code or any laws or regulations.

Personal communications using these systems should be kept to a minimum.

9. Unauthorized Use of the Property of Others in STRATTEC SECURITY CORPORATION's Possession is Prohibited.

STRATTEC SECURITY CORPORATION's customers and suppliers often entrust us with their property. You should use this property only as specified in the agreements we have with these outside organizations.

10. STRATTEC SECURITY CORPORATION's Confidential Information must be Protected.

You are responsible for protecting and keeping strictly confidential STRATTEC SECURITY CORPORATION's business plans, financial documents, customer information, technology and other trade secrets or

proprietary information. Do not communicate this information to outsiders unless you have been authorized to do so, and do not share this information with other employees except on a "need-to-know" basis. You should also follow any specific confidentiality procedures that may be issued from time-to-time. Using confidential information for your personal benefit or in any way not directly related to your duties as a STRATTEC SECURITY CORPORATION employee is prohibited. Your obligation to keep this kind of information confidential continues even if you leave STRATTEC SECURITY CORPORATION. No employee may communicate with the media, stockbrokers, stock analysts or shareholders on any matter relating to STRATTEC SECURITY CORPORATION without the express prior approval of STRATTEC SECURITY CORPORATION's Chief Executive Officer or Chief Financial Officer.

11. Privacy of Employee Information must be Maintained.

STRATTEC recognizes and protects the privacy and confidentiality of employee medical and personnel records. Such records must not be shared or discussed outside STRATTEC, except as authorized by the employee or as required by law, regulation or a subpoena or order by a court of competent jurisdiction or requested by a judicial or administrative or legislative body. Any request for such records by anyone outside of STRATTEC must be approved by STRATTEC's Chief Financial Officer.

12. Receipt and Use of Trade Secret and Confidential Information of Others is Restricted.

You may receive and use trade secrets and other confidential information from an outsider only on the basis of a written understanding that has been reached with the outsider that the information need not be treated as confidential or as otherwise specified in a written understanding approved by STRATTEC SECURITY CORPORATION's Chief Financial Officer. You should also keep confidential the trade secrets and confidential information of your former employer.

13. Our Actions in the Marketplace will be Lawful, Ethical and Fair.

You have an obligation to protect STRATTEC SECURITY CORPORATION's relations with its customers and suppliers by acting lawfully, ethically and fairly. Any questions about what action is required in any particular situation in order to meet this standard should be referred to your immediate supervisor or, if appropriate, STRATTEC SECURITY CORPORATION's Chief Financial Officer or another officer of the Company.

14. Full and Accurate Disclosure in SEC Reports.

STRATTEC SECURITY CORPORATION's principal executive officer, principal financial officer, principal accounting officer or controller or persons performing similar functions (STRATTEC SECURITY CORPORATION's "SEC reporting officers") are responsible to promote and oversee systems and procedures reasonably designed to facilitate STRATTEC SECURITY CORPORATION's ability to provide full, fair, accurate, timely and understandable disclosure in reports and documents that STRATTEC SECURITY CORPORATION files with, or submits to, the SEC and in other public communications made by STRATTEC SECURITY CORPORATION. All other STRATTEC SECURITY CORPORATION officers, STRATTEC SECURITY CORPORATION directors and other STRATTEC SECURITY CORPORATION employees involved directly or indirectly in the preparation of such SEC reports or other public communications are responsible for assisting STRATTEC SECURITY CORPORATION's SEC reporting officers in providing full, fair, accurate, timely and understandable disclosure. All such persons must exercise the highest standards of care in preparing such SEC reports or other public communications in accordance with the following guidelines:

- All STRATTEC SECURITY CORPORATION accounting records, as well as reports produced from those records, must be in accordance with the laws of each applicable jurisdiction.
- All records must fairly and accurately reflect the transactions or occurrences to which they relate.
- All records must fairly and accurately reflect, in reasonable detail, STRATTEC SECURITY CORPORATION's assets, liabilities, revenues and expenses.
- STRATTEC SECURITY CORPORATION's accounting records must not contain any false or intentionally misleading entries.
- No transactions should be intentionally misclassified as to accounts, departments or accounting periods.
- All transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period.
- No information should be concealed from the independent accountants.
- Compliance with STRATTEC SECURITY CORPORATION's system of internal accounting controls is required.

15. Improper Influence on Audits is Prohibited.

You may not take or facilitate any action to fraudulently influence, coerce, manipulate or mislead STRATTEC SECURITY CORPORATION's independent accountants for the purpose of rendering the STRATTEC SECURITY CORPORATION's financial statements materially misleading.

16. STRATTEC SECURITY CORPORATION Records must be Properly Maintained.

You must always record information accurately, honestly and in accordance with all relevant accounting, recordkeeping and document retention standards. No employee is ever authorized to knowingly enter or maintain false or misleading information in corporate books, records or reports. Also, no circumstances justify keeping "off-the-books" accounts in any form, particularly accounts established to facilitate or disguise questionable or illegal payments.

Employees in possession of corporate records are responsible for the use and safekeeping of such records and must take all prudent measures to safeguard the privacy of employees and other individuals with respect to personal information contained in such records.

STRATTEC SECURITY CORPORATION business records must be maintained for the periods specified in any document retention policy of STRATTEC SECURITY CORPORATION then in effect. Records may be destroyed only at the expiration of the pertinent period. In no case may documents involved in a pending or threatened litigation, government inquiry or under subpoena or other information request be discarded or destroyed, regardless of the periods specified in any document retention policy of STRATTEC then in effect. In addition, you may never destroy, alter or conceal, with an improper purpose, any record or otherwise impede any official proceeding, either personally, in conjunction with, or by attempting to influence, another person.

You must use common sense and observe standards of good taste regarding the content when creating business records and other documents (such as e-mail) that may be retained by STRATTEC or a third party. You should keep in mind that at a future date, STRATTEC or a third party may be in a position to rely on or interpret the document with the benefit of hindsight and/or the disadvantage of imperfect recollections.

You are required to cooperate fully with appropriately authorized internal or external investigations. Making false statements to or otherwise misleading internal or external auditors, corporate counsel, STRATTEC SECURITY CORPORATION representatives or regulators can be a criminal act that can

result in severe penalties. You should never withhold or fail to communicate information that raises ethical questions and thus should be brought to the attention of higher levels of management.

17. Insider Trading.

Material nonpublic information is nonpublic information about STRATTEC that a reasonable investor would consider important in making a decision to buy, sell or hold STRATTEC stock. This includes, for example, nonpublic information on earnings, significant gains or losses of business, changes in material contingent liabilities, tender offers, or significant acquisition or divestiture negotiations.

In order to assist with compliance with laws against insider trading, STRATTEC SECURITY CORPORATION has adopted a specific policy governing employees' trading in securities of STRATTEC. This Insider Trading Policy has been distributed to every employee, including those employees who are likely to possess material non-public information. It is the employee's responsibility to be aware of and comply with this policy. Disclosing material nonpublic information, acting on such information, or recommending others to act based on the information violates STRATTEC's Insider Trading Policy and federal and state securities laws. To avoid this risk:

- Do not buy or sell STRATTEC stock when you have material nonpublic information about STRATTEC. You may exercise stock options for cash under STRATTEC's stock incentive plans when you have material nonpublic information about STRATTEC, but you may not sell any shares issued upon such exercise at that time.
- Do not pass on material nonpublic information about STRATTEC to friends, relatives, or others. If you do pass on material nonpublic information and the listener uses it to trade in STRATTEC stock, it may violate STRATTEC's Insider Trading Policy and federal and state securities laws.
- Do not suggest to friends, relatives or others that they should trade in STRATTEC stock when you have material nonpublic information about STRATTEC. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal.
- Do not discuss material nonpublic information with co-workers, except to the extent that it is necessary for you to do your job.

For further information, please review STRATTEC's Insider Trading Policy or contact STRATTEC's Chief Financial Officer.

18. Applicable Laws and Regulations will be Respected.

You must abide by all applicable laws and regulations in the countries in which STRATTEC SECURITY CORPORATION operates, including insider trading laws, antitrust and fair competition laws, import and export laws and the FCPA. If you have any questions concerning the application or interpretation of laws and regulations that may relate to your business activities, consult STRATTEC SECURITY CORPORATION's Chief Financial Officer. Because of the complexity of certain types of laws, such as those relating to employment, insider trading and foreign corrupt practices, STRATTEC SECURITY CORPORATION has developed specific policies for such areas. Here again, you should consult STRATTEC SECURITY CORPORATION's Chief Financial Officer when appropriate.

You are encouraged to report any known or suspected criminal activity of any nature, or any dishonest or fraudulent act, which may affect STRATTEC, its officers, directors, employees or customers to the appropriate person as provided under "Reporting Violations" below.

STRATTEC prohibits sexual or any other kind of harassment or intimidation. If you believe that you are being subjected to harassing behavior, or if you observe or receive a complaint regarding such behavior, you should report it to the appropriate person as provided under "Reporting Violations" below.

19. You must Immediately Report Any Fraud.

All employees must immediately report any fraud committed by management or others, including those who have a significant role in internal accounting controls or the preparation of STRATTEC's financial statements.

20. Supplemental Guidelines may apply to Certain Business Units or Personnel.

Supplemental guidelines may be developed for certain STRATTEC SECURITY CORPORATION business units or personnel to cover situations unique to their particular business or position. Any such supplemental guidelines, together with the policies stated in this document, will be considered the STRATTEC SECURITY CORPORATION Code of Business Ethics for these units or personnel.

21. Reporting Violations.

You are expected to treat compliance with ethical standards as a critical element of your responsibilities. Although this Code endeavors to address a wide range of business practices and procedures, it cannot anticipate every issue that may arise. If you are unsure of what to do in any situation, you should seek additional guidance and information before you act. You should use your judgment and common sense; if something seems unethical or improper, it probably is. If you have any questions regarding the best course of action in a particular situation, or if you suspect a possible violation of law, regulation or this Code, you should promptly contact any of the following:

- Patrick J. Hansen
Senior Vice President and Chief Financial Officer
414-247-3435
phansen@strattec.com
- Frank J. Krejci
President and Chief Executive Officer
414-247-3330
fkrejci@strattec.com
- David R. Zimmer
Independent STRATTEC Director
Chairman of the Audit Committee
248-760-1591
zimmerdr@aol.com

If you raise an ethical issue and you do not believe the issue has been addressed, you should raise it with another of the contacts listed above. All STRATTEC directors, officers and employees are expected to cooperate in any internal investigation of misconduct.

Your identity will be kept strictly confidential unless you agree to be identified, identification is necessary to allow STRATTEC or law enforcement officials to investigate or respond effectively to the report, identification is required by law or the report is baseless and not made in good faith. It is our policy not to retaliate for any reports made in good faith. In all cases, you have the commitment of STRATTEC and the Audit Committee of STRATTEC's Board of Directors that you will be protected from retaliation for reports made in good faith. The Chairman of the Audit Committee is responsible to keep a whistleblower's identity confidential unless the person agrees to be identified, identification is necessary to allow STRATTEC SECURITY CORPORATION or law enforcement officials to investigate or respond effectively to the report, identification is required by law, or the report is baseless and not made in good faith.

22. Refer Any Questions to Management.

No set of ethical guidelines can cover every situation that might arise. If you have any questions or concerns about the ethical propriety of any actions you have taken or may be about to take, you should seek clarification. If you have any questions or concerns regarding this Code or any matter covered by this Code, you should contact STRATTEC SECURITY CORPORATION's Chief Financial Officer or another officer of the Company.

23. Waivers.

STRATTEC's Board of Directors will have final responsibility for the interpretation and administration of this Code. Only the Board of Directors (or a committee of the Board) may grant waivers of any of the provisions of this Code, and any such waivers will promptly be disclosed in an SEC filing as required by SEC and other applicable rules and regulations. A determination by the Board of Directors (or an authorized committee of the Board) that a particular matter does not violate the provisions of this Code shall not be construed as a waiver of this Code.

Protection of our reputation for integrity and honesty, and for acting in good faith in all of our dealings requires the continuous efforts of each of us in all of our business activities.

CONFIDENTIAL

**Please detach this Policy Statement and
return the original signed and dated
page to Pat Hansen
by July 18, 2016**

**STRATTEC SECURITY CORPORATION AND SUBSIDIARIES
CODE OF BUSINESS ETHICS
2016 EMPLOYEE CERTIFICATION**

I hereby certify to STRATTEC SECURITY CORPORATION as follows:

1. I have received and will retain a copy of the *STRATTEC SECURITY CORPORATION Code of Business Ethics* (the "Code") that was attached to this Certification.
2. Any questions I may have had about the meaning of any provisions of the Code have been answered to my satisfaction.
3. Except as set forth below, during fiscal year 2016, (a) none of my actions have violated any provisions of the Code, directly or indirectly, and (b) I know of no actions by any other STRATTEC SECURITY CORPORATION employee that have violated any provisions of the Code, directly or indirectly.
4. I understand the importance of complying with the provisions of the Code, and I will comply with such provisions in the future, including the requirement to disclose to STRATTEC SECURITY CORPORATION possible violations as I discover them.

[Use the following space to describe in detail any exceptions to item 3 above. Attach additional pages if necessary.]

Dated: _____

(Signature)

(Print Your Name)