

JALUX GROUP CODE OF CONDUCT

We have established “JALUX GROUP CODE OF CONDUCT” and adjusted our operation system to thoroughly maintain awareness of compliance. This CODE OF CONDUCT is the principles which, based on our management philosophy (“Contributing to Tomorrow”), lead us to strive for compliance by all of us with such rules as internal rules, contracts, corporate ethics as well as laws and regulations, becoming conscious that a company is a member of society, and to keep a conscientious and fair relationship with shareholders, customers, employees, business partners and further a whole of society and to meet needs of and make contribution to society.

Jalux and its affiliated companies worldwide (Jalux Group) are committed to the highest standards of integrity in conduct of their business. This CODE OF CONDUCT applies to all Jalux Group employees, directors and officers.

1. We Follow the Law

We will comply with all laws and regulations applicable to us. In particular, we will:

- (1) Trade: Comply with all applicable export, re-export and import laws and regulations.
- (2) Antitrust: Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which we conduct business. We will not agree or undertake with our competitors to fix prices, rig bids, divide markets or limit production.
- (3) Anti-Corruption: Not participate in bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. Jalux is committed to observing the standards of conduct set forth in the anti-corruption and anti-money laundering laws of the countries in which Jalux operates, including the U.S. Foreign Corrupt Practices Act and/or UK Bribery Act. We must not, directly or indirectly, offer or pay anything of value (including travel, gift, hospitality expenses and charitable donations) to any employee or official of any commercial enterprise or government, government agency or public international organization.
- (4) Antisocial forces: Not give money to, or enter into contracts with, antisocial forces or organizations, such as corporate racketeers and organized crime groups.

When any doubt exists as to the legality of any proposed action or agreement, the matter should promptly be discussed with the Compliance Department.

2. We Respect for Human Rights

- (1) We commit to human rights and equal opportunity in the work place. We commit to a workforce and workplace free of harassment and discrimination. While we recognize and respect cultural differences, we will not engage in discrimination based on race, religion, color, national origin, age, gender, disability, marital status or pregnancy. In addition, safety in the work place is a primary concern to Jalux Group. We must adhere to all applicable health and safety laws and regulations we well as internal rules and policies respecting work place safety.
- (2) We will not use any form of forced or involuntary labor. In addition, we will not use child labor. The term “child” refers to a person younger than 15 years old or the local minimum age for labor, if it is higher. This standard does not apply to work or service of performers, musicians or artists by its nature is reasonably necessary to be procured from a child.

3. We Understand Jalux’s Policies Concerning Insider Trading

If we are aware of material non-public information relating to Jalux or another company, we may not buy or sell Jalux or another company’s securities or pass that information on to others. “Material non-public information” is any non-public information which could influence an investor to trade stocks or securities. It is not possible to list all kinds of material information, but some examples are: financial performance including earnings, dividend plans, alliances with other companies, divestiture, acquisitions, new products and any other significant activities.

4. We Understand Jalux’s Gifts and Entertainment Policies

We will not accept any kickback, favor, cash, gratuity, entertainment or anything of value for our favorable treatment to the giver. Any gift, meals or entertainment must comply with applicable law, must not violate the giver’s and/or recipient’s policies on the matter, and must consistent with local custom and practice.

5. We Understand Jalux’s Policies Concerning Personal Information

We respect the privacy of individual. We are expected and directed to observe all applicable laws and regulations as well as applicable internal rules and policies in collecting, maintaining, using, disclosing, disposing of and otherwise handling personal information.

6. We Protect Intellectual Property

We respect and protect the intellectual property rights of others by only using software, hardware and content that has been legitimately acquired and licensed. We must not knowingly misuse the intellectual property of others or violate their intellectual property rights including but not limited to copyrights, patents, trademarks and trade secrets. We will safeguard our own confidential and proprietary information as well as the information that suppliers, business partners or customers entrust to us.

7. We are Environmentally Responsible.

It is the policy of Jalux to continually seek to minimize the environmental impact of its products, services and operations. We endeavor to reduce waste of all types, including water and energy, by implementing appropriate conservation measures in our facilities and by recycling, reusing or substituting materials.

8. We Avoid Conflict of Interest

All business decisions must be made, and all business activities must be conducted, in the best interests of Jalux Group. We must avoid any action which may involve, or may appear to involve, a conflict of interest with Jalux Group. None of us may have any financial or other business relationship with suppliers, customers or competitors that might impair the independence of any judgments we may need to make in the best interest of Julux Group.

9. We Coexist with Local Communities

We will take the initiative, as a good corporate citizen, to contribute to the development of the local economy by participating in community activities and events. We will bring about coexistence and co-prosperity by carrying out our business activities based on adequate understanding of the local economy, culture and customs.

10. We Prepare Proper Accounting Books

All records, recordation and reporting of information, including but not limited to accounting books and other financial records, must be accurate, complete, honest and timely and must be a fair representation of facts. We will comply with all relevant laws and accounting standards and should never cause records to be inaccurate or create records that are misleading or artificial.

11. Penalties

Violation of this CODE OF CONDUCT may constitute violation of laws, work rules or other internal regulations, which may, depending on the mode and degree of the violation, result in criminal penalties or disciplinary punishment for you, your supervisor and/or those neglect or ignore the violation.