

LIGHTRON CODE OF CONDUCT

LIGHTRON Inc. (“LIGHTRON”) designs, manufactures and markets tons of optoelectronic components and devices for fiber optics markets. In order to meet social responsibilities and to achieve success in the marketplace, LIGHTRON upholds the highest standards business management system based on the [Responsible Business Alliance](#) (RBA, formerly EICC®) Code of Conduct established standards including:

(1) Labor

LIGHTRON is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community.

LIGHTRON is obligated to comply with local laws and trade agreements in every territory it conducts its business.

Participants shall adhere to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information.

- ① Freely Chosen Employment
- ② Young Workers
- ③ Working Hours
- ④ Wages and Benefits
- ⑤ Humane Treatment
- ⑥ Non-discrimination
- ⑦ Freedom of Association

(2) Health and Safety

Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

- ① Occupational Safety
- ② Emergency Preparedness
- ③ Occupational Injury and Illness
- ④ Industrial Hygiene
- ⑤ Physically Demanding Work
- ⑥ Machine Safeguarding

- ⑦ Sanitation, Food and Housing
- ⑧ Health and Safety Communication

(3) Environmental

LIGHTRON Ltd. management system was certified to comply with ISO 14001 Environmental management systems – Requirements with guidance for use. It is audited annually by a third party for continual compliance. In addition, LIGHTRON complies with local pollution laws and materials restrictions use such as RoHS, REACH, Conflict Minerals, etc. as required in the territory it conducts its business.

- ① Environmental Permits and Reporting
- ② Pollution Prevention and Resource Reduction
- ③ Hazardous Substances
- ④ Solid Waste
- ⑤ Air Emissions
- ⑥ Material Restrictions
- ⑦ Water Management
- ⑧ Energy Consumption and Greenhouse Gas Emissions

(4) Ethics

- ① Business Integrity – The highest standards of integrity are to be upheld in all business interactions. LIGHTRON has a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings are accurately reflected as required by applicable laws, regulations and accounting rules on LIGHTRON's business book and records. Monitoring and enforcement procedures are implemented to ensure compliance with anti-corruption laws.
- ② No Improper Advantage – Bribes or other means of obtaining undue or improper advantage are not offered or accepted.
- ③ Disclosure of Information – Information about our Company's business activities, structure, financial situation and performance is disclosed in accordance with applicable laws and regulations. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.
- ④ Intellectual Property – Intellectual property rights are respected. Transfer of technology and know-how is done in a manner that protects intellectual property rights in accordance with agreements of the parties.
- ⑤ Fair Business, Advertising and Competition – Applicable standards of fair business, advertising and competition are upheld.
- ⑥ Privacy (Protection of Identity) – We are committed to complying with applicable privacy and information security laws and regulations when personal information is collected, stored, processed,

transmitted, and shared, including with regard to the personal information of suppliers, customers, consumers and employees with whom we do business.

- ⑦ Non-Retaliation – LIGHTRON a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

(5) Management System

LIGHTRON management system was certified to comply with ISO 9001 Quality Management Systems – Requirements, ISO 14001 Environmental Management Systems – Requirements with guidance for use. Both of these are audited annually by a third party for continual compliance.