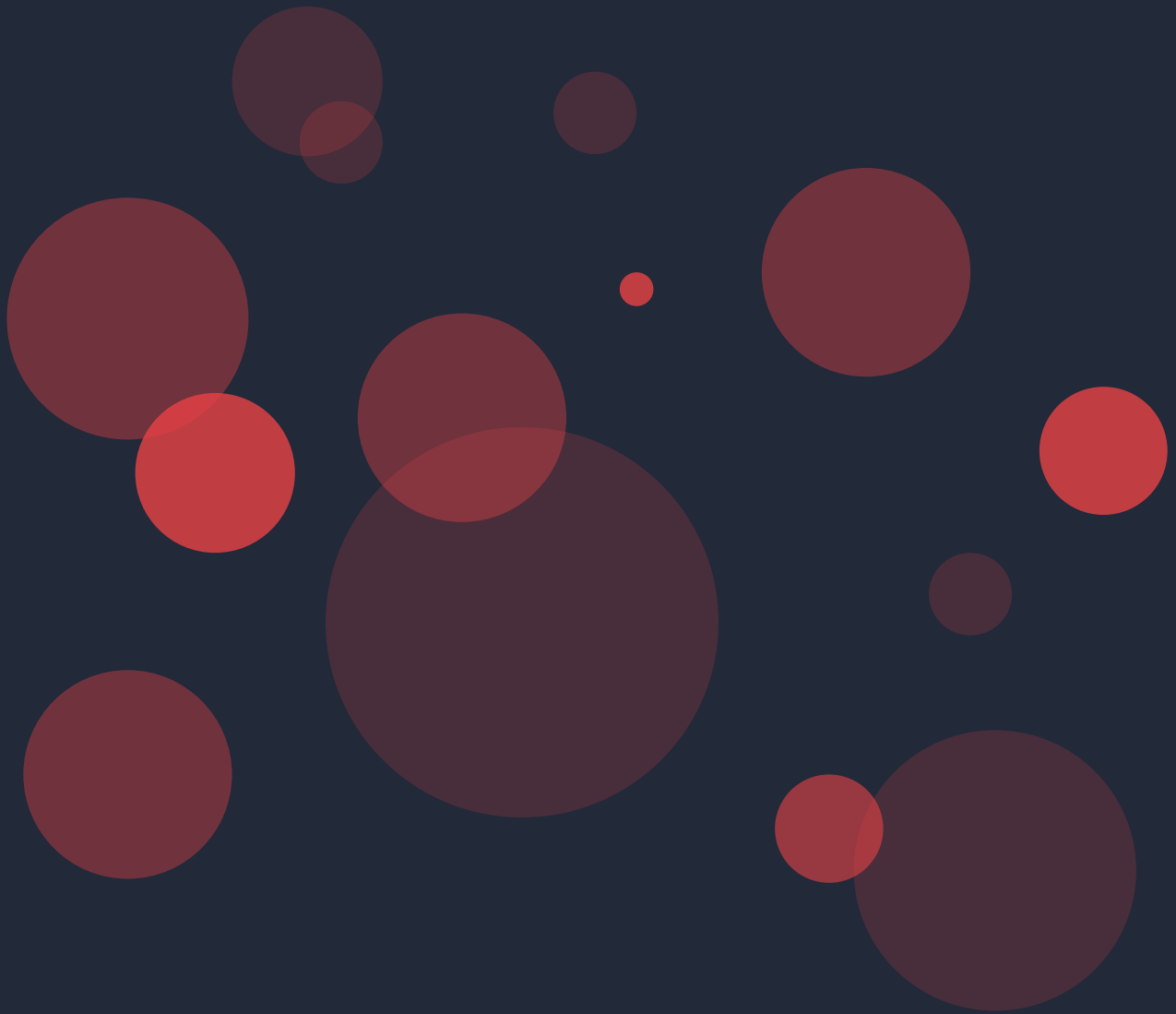


smartoptics



**CODE OF
CONDUCT**

CODE OF CONDUCT

INTRODUCTION

Smartoptics is an international company with headquarter in Oslo, Norway. Our strength lies in our corporate culture where we value transparency, integrity, honesty, and respect for fair-trade business. We are innovators with creative solutions that help us grow and contribute to a sustainable society, not only through our products but also through our values.

SOCIAL RESPONSIBILITY

EQUAL OPPORTUNITY

There is no discrimination during recruitment, compensation, skills development, promotion, and retirement based on gender or sexual orientation, race, color, age, pregnancy, marital status, religion, political opinion, nationality, ethnic origin, caste, disease, or disability. There is a grievance mechanism in place enabling employees to submit complaints without risk of retaliation.

HUMAN RIGHTS AND WORKING CONDITIONS

Smartoptics is committed to respect the United Nations Convention of Human Rights. Employees shall understand their employment conditions. All employees must be provided with a written document that outlines the basic terms and conditions of employment in a language understandable to them. Pay and terms shall be fair and reasonable and comply at a minimum with applicable laws or industry standards, whichever is higher. Working hours shall comply with applicable laws. Vacation is regulated by respective local vacation acts. We have zero tolerance for forced labor and child labor. We respect every co-worker right to freedom of association and collective, and thus respect the rights of co-workers to join, form, or not to join, a co-worker association of her or his choice without fear of punishment or harassment.

HEALTH AND SAFETY

The health and safety of our employees will be prioritized. We have Health, Safety and Environment rounds with the dedicated safety representative. HSE audit include emergency plans, control of fire equipment, work environment – both physical and psychosomatic – etc. to ensure a healthy and safe work environment. Necessary steps will be taken accordingly to findings during HSE audit. We are committed to maintaining high standards and complying with relevant local legislation and guidelines in any area in which we operate. Health and safety incidents

are recorded and are investigated. We shall provide support to employees to maintain a balance between work and personal life.

DISCRIMINATION

Every employee is always treated with respect and dignity. All kinds of discrimination based on partiality or prejudice is prohibited, such as discrimination based on race, color, gender, sexual orientation, gender identity, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age, union membership or employee representation and any other characteristic protected by local law, as applicable. Employees with the same qualifications, experience and performance shall receive equal pay for equal work with respect to those performing the same jobs under similar working conditions. No employee should be subject to humiliation or punishment or subject to physical, sexual, psychological, or verbal harassment or abuse.

ENVIRONMENTAL RESPONSIBILITY

WASTE MANAGEMENT

Smartoptics is highly aware of the impact wasted resources. We report our waste management internally to be able to see opportunities for improvement. We care about the environment and nature, and we are glad to being able to contribute to circular resource management. Our first step on the road is to convert our food waste into compost and then into soil. In this way we can contribute to the circularity where our food waste can be useful where it is needed.

CHEMICALS AND ELECTRICAL WASTE

Our products are RoHS/REACH compliant and when applicable CE, UL/ETL, TÜV Rheinland and NEBS level 3 certified.

For all waste, we have engaged a recycle and disposal company to comply with the WEEE-regulation from the European Commission.

EMISSION

We are aware that we leave a footprint behind us. Therefore, we have chosen to measure our emissions to find solutions that reduce our footprint. We aim to use green transports to reduce our emission. We strive to find suppliers who can offer us solutions that reduce

our footprint. We measure our emissions every year in accordance with the GHG protocol.

All employees are encouraged to choose environmentally friendly options when it comes to travel.

BUSINESS INTEGRITY

SOUND AND FAIR-TRADE BUSINESS RELATIONS

Smartoptics complies with the law and regulations in all jurisdictions where we do business. Our way to deal with business partners is characterized by honesty, respect, fairness, and integrity. We ensure that our Business Partners (suppliers, customers, and sub-contractors etc.), are aware of our Business Partner Code of Conduct.

CORRUPTION

We have zero tolerance against any form of corruption. We conduct internal training to inform about our approach and to raise awareness among all employees.

BRIBES AND KICKBACKS

No employee of Smartoptics may demand, accept and/or offer to give to any representative (an individual) of a business partner or third party, any kind of bribe, kickback or any other unlawful or unethical benefit.

GIFTS AND ENTERTAINMENT

Gifts and entertainment given or offered to a third party in the course of employment shall be modest, appropriate, and business related, comply with applicable laws, and conform to the recipient's organization's policies or rules and be fully disclosed and transparent. Cash or cash equivalents may never be offered, accepted, or requested.

MONEY LAUNDERING

Money laundering and the funding of terrorist and criminal activities is strictly prohibited. It is therefore vital that employees are familiar with and comply with all applicable laws related to such matters.

CONFLICTS OF INTEREST

We shall always make business decisions based on what is the best of Smartoptics. Decisions shall never be based on personal considerations or relationships.

POLITICAL CONTRIBUTION

Smartoptics observes political neutrality.

Smartoptics does not engage in politics and does not participate in any initiatives that could be perceived as political. Nor does the company provide financial support to political parties.

INSIDER TRADING

It is a criminal offense to trade in Smartoptics shares based on inside information or to help somebody to do so. Insider trading is unlawful and will lead to disciplinary action and

could ultimately result in legal or criminal proceedings.

PROTECTION OF INFORMATION AND MAINTENANCE OF CONFIDENTIALITY

CONFIDENTIALITY

Our information management is based on confidentiality, integrity, and accuracy. Employees are required to maintain the confidentiality of Smartoptics and customer information and the personal data of colleagues. Confidential information is also including but not limited to information, which is not publicly available about Smartoptics' customers, employees, suppliers, shareholders, processes, internal documents.

Smartoptics complies with the applicable personal data regulation and privacy laws in the countries in which it operates and has a Global Data Protection Policy with which all employees must comply.

PROTECTIONS OF ASSETS

We strive to protect our own intellectual property and respect the intellectual property of others. Employees must use and protect Company assets and resources under their control and may not use these for personal benefit or to perform work for an external party. Smartoptics values the trust of customers, partners and suppliers and respects their intellectual property. Using third party intellectual property in an unlawful way could lead to disciplinary action.

RAISING CONCERNS AND COMPLIANCE

WHISTLEBLOWING FUNCTION

If a co-worker doesn't feel comfortable raising an issue directly with the person involved, we encourage the use of Smartoptics whistleblower function.

Deciding to raise a topic can be difficult but we encourage everyone to report wrong doings. We guarantee anonymity and the right to feedback if you so wish. The person who blows the whistle will be protected and will not be subject to any punishment. We will handle every subject with confidentiality.

