

North American Lighting

Corporate Social Responsibility & Code of Conduct

North American Lighting is deeply committed to promoting and maintaining the very highest standards of ethical conduct, integrity and quality. We look forward to continuing to build strong relationships between our employees, communities and stakeholders that will support our growth as an organization.

- Each employee has the ability to positively impact other employees, our business partners, customers, consumers and the communities we reside in by following this Code of Conduct.
- NAL supports equal employment opportunities, provides safe & fair working conditions, respect for human rights and promotes an ethical culture.
- We strive to minimize the environmental impact of our business operations while continuing to develop eco-friendly processes.
- NAL maintains a respect for all people by honoring culture, customs, history and laws for the communities and countries we work within.

This Code of Conduct sets forth the basic internal standards to be observed by all directors, officers and employees (“Personnel”) of North American Lighting, Inc. (NAL). NAL commits itself to be bound by this Code of Conduct and at the same time requires all Personnel to know, understand and comply with this Code of Conduct. This document is not all inclusive and may be changed as necessary.

1. General Standards

1.1 Compliance with Laws, Internal Rules and Policies; Ethical Business Conduct

NAL’s policy is to comply with all applicable laws and regulations of the countries and regions in which it operates and to conduct its business activities in an honest and ethical manner. All Personnel are expected and directed to comply with all applicable laws and regulations as well as all internal company rules and policies relating to their business activities. It also is all Personnel’s responsibility to know and understand legal, regulatory and internal requirements as they apply to their jobs.

1.2 Relationship with Stakeholders

It is the core corporate responsibility of NAL to society to pursue its corporate value enhancement through innovation and sound business practice. NAL recognizes that its business activities have direct and indirect impact on the societies in which it operates, and therefore sound business practice requires that business decisions give due consideration to the interests of its stakeholders including shareholders, customers, employees, suppliers, business partners, local communities and other organizations. Personnel must endeavor to conduct the business of NAL accordingly.

1.3 Appreciating Diversity

NAL conducts its business in an environment that is diverse and global. We recognize that some forms of conduct that are socially and professionally acceptable in one culture or region may be viewed differently in another; Personnel are required to give careful consideration to cultural and regional differences in performing their duties.

1.4 Avoiding Structural Conflicts of Interest

In making business decisions, Personnel must act on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of NAL. Personnel must check and ensure that the decision to be made will satisfy at least the following preconditions:

- (i) Lawfulness and legitimacy (i.e., compliance with applicable laws and internal rules and policies);
- (ii) Disinterest (i.e., the absence of personal interest or self-dealing);
- (iii) Authorization (i.e., within individual authority levels given by the corporation);
- (iv) Due care (i.e., an informed decision following a reasonable effort to become familiar with the relevant and available facts);
- (v) Good faith (i.e., the reasonable belief that the best interests of the corporation are served); and
- (vi) No abuse of discretion (i.e., a decision based on a reasonable exercise of discretion). Structural conflicts may impair the individual's ability to make business decisions as described above. Accordingly, directors, officers and managers of NAL must exercise appropriate caution in structuring its internal organizations, or that of each NAL company.

1.5 Communication of Concerns and Alleged Violations

NAL encourages all Personnel to voice concerns promptly, if they have a good faith belief that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this Code of Conduct. To facilitate communication and adequate handling of any such concerns, NAL will establish and maintain hotline system(s) independent of ordinary reporting structures. Personnel who come forward in good faith to report issues will be treated fairly and respectfully. NAL will not tolerate any form of retaliation against any such individuals, assuming they have not been involved in the violation, and will endeavor to protect their anonymity as far as practicable.

2. Respect for Human Rights and Labor Standards

This section of the Code sets forth NAL's guidelines for human rights, labor and environmental standards throughout its North American operations. These policies are consistent with the human rights laws and charters listed below:

- International Bill of Human Rights (The United Nations Universal Declaration of Human Rights and its two Covenants) 1948
- The UN Human Rights Council Guiding Principles on Business and Human Rights (2011)
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises Revision 2011
- The Global Sullivan Principles
- The ILO Declaration on Fundamental Principles and Rights at Work
- ILO Tripartite Declaration on Multinational Enterprises and Social Policy
- The UN Convention against Corruption (2005)

NAL has established the following basic principles to be followed in our diverse locations throughout North America. Under certain circumstances, local, state or national law may supersede this policy, and NAL will follow the laws and regulations where our facilities reside. Nevertheless, the NAL maintains that this policy will serve as the basic guiding principles that should serve as the foundation of our relationship with our employees and stakeholders.

2.1 Human Rights

NAL is committed to respect human rights and won't condone nor support any activities that would infringe upon the rights of others. All employees will follow company policies as well as local, state and national laws and regulations related to human rights. Every employee is obligated to report any potential risk or violation of human rights to the Human Resources Department or the President of North American Lighting.

2.2 Equal Employment Opportunity & Nondiscrimination

NAL is committed to a policy of recruiting, hiring, training, promoting and otherwise treating applicants and employees without discrimination based on their race, religion, color, national origin, age, sexual orientation, gender identity, veteran status, disability or other factors that are unrelated to the legitimate business interests of NAL.

2.3 No Forced Labor /Child Labor

NAL will not use any form of forced or involuntary labor. The company will not tolerate physical or verbal abusive practices of any kind. In addition, NAL will not use child labor. The term "child" refers to a person younger than 15 years old (or 14 years old where a local law provides for a lower age) or the local legal minimum age for labor, if it is higher. The company will not use or support human trafficking in its labor force.

2.4 Freedom of Association & Collective Bargaining

NAL respects and recognizes our employees' right to associate freely and bargain collectively if so deemed accordingly. Employees are encouraged to communicate with management freely to express their ideas and concerns. The company will also work constructively with recognized employee representatives in the best interest of our employees as necessary.

2.5 Sound Labor and Employment Practices

It is the policy of NAL to adopt sound labor and employment practices and to treat its employees at all times in accordance with the applicable laws and regulations of the countries and regions in which it operates.

2.6 Harassment in the Workplace

North American Lighting maintains a Zero-Tolerance policy in regards to any type of harassment in the workplace. NAL will strive to maintain a healthy, safe and productive work environment that is free from discrimination or harassment. Employees may not make sexual advances, actions or comments, or racial or religious slurs, jokes or any other comments or conduct in the workplace, that create a hostile work environment. In addition, NAL team members must observe the policies contained in the "NAL Policy on Sexual and Other Forms of Harassment".

3. Conducting Business with Integrity and Fairness

3.1 Product and Service Safety

The safety of customers and our employees using NAL products is of utmost concern to the Company. In all phases of its operations, including R&D, planning, design, production, sales and after-sales service, NAL will continually develop and implement programs that meet or exceed legal requirements to help ensure the safety of its products and services. NAL is committed to giving safety instruction and information to customers and employees that is accurate, understandable and prominently displayed. Should an accident or safety problem be

reported in connection with NAL's products or services, NAL will promptly investigate the matter and take appropriate action.

3.2 Environmental Conservation

It is the policy of NAL to continually seek to minimize the environmental impact of its products, services and operations. To carry out such an environmental policy, NAL will endeavor to evaluate and, as appropriate, implement programs that meet or exceed legal requirements, and to consider environmental impact as a fundamental criterion when evaluating projects or operations.

3.3 Fair Competition

It is the policy of NAL to comply with all applicable antitrust, competition and fair trade laws and regulations of each country and region where NAL conducts business. These laws and regulations are designed to prohibit agreements or undertakings *vis-à-vis* third parties that fix prices, divide markets, limit production or otherwise impede or destroy market forces. Some countries or regions have antitrust or competition laws that assert extraterritorial jurisdictions over certain activities taking place outside the jurisdictions if they affect the markets of those jurisdictions. All Personnel must know and comply with those laws and regulations applicable to their jobs. When any doubt exists as to the legality of any proposed action or agreement, the matter should promptly be discussed with legal counsel.

3.4 Advertising

NAL sells products on their merits. It is the policy of NAL not to engage in false or misleading advertising or advertising that slanders others. Certain countries prohibit comparative advertising, but where a reference to a competitor or its products or services is sought in the permitted countries, the comparison should be substantiated and the statement should be complete, accurate and not misleading.