

North American Lighting Social Responsibility Statement & Code of Conduct

Compliance Mission

North American Lighting, Inc. ("NAL") 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 can positively impact other employees, our business partners, customers, consumers and the communities we reside in by following NAL's 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.

NAL's Code of Conduct sets forth the basic internal standards to be observed by all directors, officers and employees ("Team Members") of NAL. NAL commits itself to be bound by the Code of Conduct and at the same time requires all Team Members to know, understand and comply with the Code of Conduct. These core values are summarized in the following:

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 Team Members 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.

1.2 Relationship with Stakeholders

It is NAL's core corporate responsibility to society to pursue its corporate value enhancement through innovation and sound business practice. Team Members 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; Team Members are required to consider cultural and regional differences in performing their duties.

1.4 Avoiding Structural Conflicts of Interest

In making business decisions, Team Members 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.

1.5 Communication of Concerns and Alleged Violations

NAL encourages all Team Members 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. To facilitate communication and adequate handling of any such concerns, NAL maintains a hotline system independent of ordinary reporting structures.

2. Respect for Human Rights and Labor Standards

NAL strives to always be consistent with human rights laws and charters including:

- 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)

In addition, NAL will follow the laws and regulations where our facilities reside.

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 Team Members will follow NAL policies as well as local, state and national laws and regulations related to human rights.

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 and will not tolerate physical or verbal abusive practices of any kind. NAL will not use or support human trafficking in its labor force.

2.4 Freedom of Association & Collective Bargaining

NAL respects and recognizes Team Members' 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.

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

NAL maintains a **Zero-Tolerance** policy regarding 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.

3. Conducting Business with Integrity and Fairness

3.1 Product and Service Safety

The safety of customers and Team Members using NAL products is of utmost concern to NAL. NAL will continually develop and implement programs that meet or exceed legal requirements to help ensure the safety of its products and services.

3.2 Environmental Conservation

NAL will continually seek to minimize the environmental impact of its products, services and operations. 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

NAL will comply with all applicable antitrust, competition and fair trade laws and regulations of each country and region where NAL conducts business. All Team Members must know and comply with those laws and regulations applicable to their jobs.

3.4 Advertising

NAL sells products on their merits. NAL will not to engage in false or misleading advertising or advertising that slanders others.

3.5 Public Disclosure

Koito Manufacturing Company, Inc. ("Koito"), the ultimate parent of all NAL, is owned by the public and its shares are listed on the Tokyo Stock Exchange. As a result, NAL makes various disclosures to the public in accordance with applicable securities laws and regulations. NAL is committed to full compliance with all requirements applicable to its public disclosures.

3.6 Personal Information

NAL respects the privacy of individuals, such as customers, employees of suppliers, business partners, and Team Members. Accordingly, NAL has developed policies and internal rules regarding the protection and use of personal information.

3.7 Intellectual Property

NAL recognizes the value of intellectual property such as patents, designs, trademarks, trade secrets, and copyrights.

3.8 Confidential and Proprietary Information

NAL will safeguard its own confidential and proprietary information as well as the information that suppliers, business partners or customers entrust to NAL.

3.9 Fair Procurement

NAL selects its suppliers, contractors for goods and services on the basis of competitive price, quality, delivery and other objective standards.

3.10 Gifts and Entertainment

It is NAL's policy to compete in the marketplace based on the superiority and price competitiveness of its products and services. It is strictly prohibited by the corporate policy of NAL for Team Members to make any payment to individuals employed by current or prospective

NAL customers, suppliers or other business partners for the purpose of obtaining or retaining business, or for the purpose of obtaining any other favorable business action.

3.11 Recording and Reporting of Information

All records, recordation and reporting of information, including but not limited to books and other financial records, must be accurate, complete, honest and timely and must be a fair representation of facts.

4. Ethical & Personal Conduct

4.1 Personal Conflicts of Interest

No Team Members may have any financial or other business relationships with suppliers, customers or competitors that might impair, or even appear to impair, the independence of any judgment they may need to make in the best interest of NAL. Advance disclosure of any potential conflict is the key to remaining in full compliance with this policy.

4.2 Corporate Assets

NAL's assets are to be used only for legitimate business purposes and only by authorized Team Members or their designees.

4.3 Media Relations and Public Statements

NAL's business activities may be monitored closely by the media, such as newspapers, magazines, radio, television, internet media and security analysts. As such, NAL will not make any false or misleading statements to the media.

NAL Link Line

NAL takes the ethical behavior of its Team Members very seriously. The Link Line is an ethics hotline that allows individuals to call and leave a message for NAL's President about any issue they wish to be reviewed by him. All messages left on the Link Line are reviewed daily Monday – Friday except on holidays. If you have encountered a NAL Team Member not adhering to this Social Responsibility Statement or Code of Conduct, please call the Link Line at **(217) 465-6666**.

To obtain a complete copy of NAL's Code of Conduct, please contact:

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