

## Kaertech Business Ethics Program

### DEDICATION

It is the intent of KAERTECH to have all employees conduct themselves in ways that demonstrate uncompromising ethical standards in all their dealings with customers, suppliers, government officials and agencies. In other words, the integrity of the company rests on the integrity of its employees. As the Company continues to expand globally, we must be sensitive to cultural differences while ensuring continued adherence by our employees to the Company's high ethical standards.

### PURPOSE

Our business must be judged by the highest standards of ethical behavior. The message is simple and clear: Diligent observance of the laws and regulations is a requirement from which there can be no exception. The same is true about observance of company policies and practices. However, rules can't guarantee ethical conduct; only people can. Therefore, the purpose of this policy is as follows:

- To affirm in a comprehensive statement the ethical standards required of all Company Employees.
- To encourage all employees to put the applicable ethical standards into daily practice.

### RESPONSIBILITIES

#### The Company

- Provide all employees with clear guidelines on matters of everyday business conduct.
- Implement the KAERTECH Business Ethics Program contained in this Policy.
- Ensure through communication and training programs that all employees are aware of and understand this, Policy.
- Provide continuing counsel on Company Policies and Procedures to all employees.

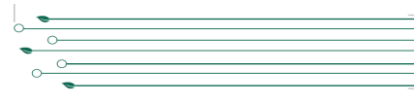
#### All Employees

- Review regularly their knowledge and understanding of the Policy
- Uphold the policies, procedures and practices that support them in their daily business conducts.
- Contribute to a workplace that is conducive to the maintenance of this Policy.
- Seek help when the proper course of action is unclear or unknown.

### GENERAL ETHICAL STANDARDS

- Below are the General standards that shall be met by all employees. However, these standards are not necessarily the only obligations that apply to employee's conduct.
- In General, all employees shall take care to avoid any conduct that could reasonably appear to be improper or might injure the Company's reputation for honesty and integrity in its activities.
- If in doubt, consult with your supervisor or one of the Management Team.





### **BUSINESS INTEGRITY**

The highest standards of integrity are required in all business interactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited resulting in immediate termination and legal actions.

### **CONFLICT OF INTEREST**

No employee may have a personal, business or financial interest that is incompatible with the loyalty and responsibility owed to the Company. It is not possible to identify every particular activity that might give rise to a conflict of interest.

### **DEALING WITH COMPETITORS**

Similarly, disclosure shall be made to the Company if an employee or any of his/her immediate family members has an ownership interest in a competitor's business or performing services of any kind, or is otherwise compensated by, a competitor.

### **OUTSIDE DIRECTORSHIP AND CONSULTING**

A company employee, if asked to serve as a director or consultant of another business, shall first receive clearance from the KAERTECH Management or from the Company's Chief Executive Officer.

### **COMPENSATION FROM OTHERS**

An employee or member of his/her immediate family shall not accept compensation, loan, entertainment or gift, property or anything else of personal financial or other advantage, from outside parties in connection with any transaction in which the company might have an interest, without making full disclosure to the company.

### **SOCIAL RESPONSIBILITY; EQUAL EMPLOYMENT OPPORTUNITY, ANTI & SEXUAL HARASSMENT**

**KAERTECH** considers employee welfare and fulfilment to be key success factor in achieving sustainable business excellence throughout the company. Employees are treated with respect and dignity, with the aim of developing their understanding and encouraging their participation in the Company's business activities. We are committed to a policy of equal employment opportunity so as to assure that there shall be no discrimination or harassment against an employee or applicant on the ground of race, color, religion, sex, sexual orientation, gender, identity, age, disability, immunization status, national origin, or any other factor made unlawful by applicable laws and regulation.

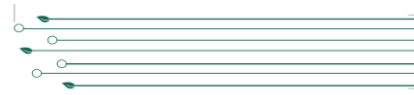
### **HEALTH, SAFETY AND ENVIRONMENT**

KAERTECH is committed to compliances with all local laws and regulations that apply to its operations, including those concerning health, safety and environment anywhere in the world. Employees will make every reasonable effort to ensure that the Company's products and places of business are safe for the public and its employees.

### **PROPRIETARY DATA**

KAERTECH's trade secrets and proprietary data are part of the Company's valuable intellectual property. An employee shall not use such information for personal benefits or for the benefits of anyone other than the Company. All customer information and proprietary data needs to be treated with the same precaution and protection of their confidentiality as well.





### **ANTITRUST / COMPETITION LAWS**

Generally, an employee shall not enter into an understanding, agreement or plan, expressed or implied, formal and informal, written or oral with a competitor in regard to prices term or conditions of sale or service, production, distribution, territories and customers. He/she shall not exchange or discuss with a competitor's prices, term or conditions of sale or services, or other competitive information, nor engage in other conduct that violates any of these laws.

### **ACCOUNTING SYSTEMS, BOOK & RECORDS**

No false, artificial or misleading statement or entries shall be made in the Company Books and records including, but not limited to, timecards, accounts and financial statement. No unrecorded off-the-books funds or secret assets of any kind shall be maintained for any purpose whatsoever.

### **COERCION OF AUDITORS**

The integrity of the company's audited financial statements is critical. No employee shall take any action to fraudulently influence, coerce, manipulate, or mislead the Company's accountant to engage in the performance of an audit of the company's financial statement for the purpose for rendering the resulting financial statements and make it misleading.

### **PROTECTION & PROPER USE OF COMPANY ASSETS**

Protecting company assets against loss, theft and misuse is the responsibility of every employee. Any suspected theft, fraud or inappropriate use of company assets should be reported to an employee's supervisor or someone from the Management. Assets may only be used in accordance with company policies. It may not be sold, loaned, given away or disposed of without proper authorization.

### **SUPPLIERS, CONSULTANTS & AGENTS**

Suppliers, Consultants and Agents may be able to assist the company in achieving its legitimate business objectives. However, company personnel must take step to ensure that THEY comply with the relevant laws and regulations, company's' policies and terms of agreements, including requirements concerning procurement information and conflict of interest. Agreements with the suppliers, consultant or agents shall require such compliance by both parties.

### **POLITICAL PAYMENTS**

No funds and assets of the Company shall be used to aid any candidate or nominee for any political parties or committees unless otherwise permitted by law and approved in advance by the Governmental/Public Affairs Department.

### **REPORTING & EVALUATING A POTENTIAL CONFLICT OF INTEREST**

If you believe that you have a potential conflict of interest situation, you should report it to your supervisor, to HR, or to any of the Management team. All reported potential conflicts of interest will be evaluated by the Management which will be determined whether a conflict of interest really exists. If any indication of violation of this Business Ethics Policy, you may reach with confidentiality our email hotline [allears@kaertech.com](mailto:allears@kaertech.com).

