

1 Introduction

Corporate ethics are about how we behave towards each other and the world around us. The Code of Conduct (CoC) is the foundation of our corporate culture and defines the core principles and ethical standards by which we create value in our company. The COC gives guidelines to how we shall behave both internally and externally. COC shall stimulate ethical awareness and be a guideline for everyday actions.

The COC applies to all member of the board, all employees and representatives of poLight ("employees") as well as direct business partners such as agents or re-sellers, here called affiliates. poLight aims for these guidelines also to be well known by customers, suppliers, acquired companies and partners. All managers are responsible for the COC being known, lived up to, and that actions will be taken if codes are broken. Each employee has a responsibility to read and follow the COC.

Violation of the COC will be subjected to disciplinary action including possible termination as well as potential criminal prosecution.

2 Personal conduct, working environment and human rights

poLight expects dedicated employees, who treat others with respect and maintain an open communication. In poLight there shall be no discrimination or harassment of age, gender, disabilities, race, sexual orientation, ethnic origin, religion or political affiliation. poLight shall be an engaging workplace with an inclusive working environment. poLight expects that no employees or affiliates make any actions that could harm the poLight brand.

When we are working in other cultures than our own, we treat everyone – persons as well as organisations – with respect, and we are acting in accordance with national laws and regulations. We also pay attention to local etiquette and values in the countries we are working in. In meetings with contacts outside poLight we appear as professionals in behaviour and conduct.

poLight supports and respects internationally proclaimed human rights, including those specified by the International Labour Organization. The company respects the right to freedom of association and opposes any form of child labour, forced labour or discrimination, and requests all representatives and suppliers to follow the same principles.

poLight is committed to have systems in place to minimize the risk of human and labour rights violations in our own operations and in our supply chain. poLight shall carry out activities to identify, assess, address and report on social impacts and risks linked to poLight operations and in our supply chain.

3 Conflicts of interests

No personal interests or personal gain shall affect your work in poLight. As an employee or affiliate you shall never take actions or have interests that make it difficult to perform your work objectively and effectively. You shall never be a part of, or influence decisions or actions, where you can be a part of a conflict of interest between you and the company. In such situations poLight is expecting openness and loyalty to poLight.

poLight employees shall not hold positions or carry out work for other companies without permission from a superior. Engagements in external duties and positions shall not affect your working relationship with poLight. Each employee is responsible to inform poLight management about a real or potential conflict of interest.

4 Confidential and proprietary information

Our knowledge, competence and experience are our most valuable assets in poLight. The ability to develop and deploy solutions for our customers' is the reason why we exist in the market, - our competitors are strengthened if they can reveal our secrets. Therefore it is extremely important to protect our intellectual property.

Every person working for poLight – employees, consultants, companies or others – shall have signed an employment contract or a contract of engagement and a separate nondisclosure agreement (NDA). Anyone who is leaving the company shall remember that they are still bound by their NDA.

5 Competition

poLight will always follow the national and foreign antitrust laws. poLight wants to have a fair and open competition in all markets. There shall be no formal or informal agreements with competitors that seek to restrict competition. Examples of such actions can be seeking to fix or control prices, allocate products or markets, or boycott customers and suppliers.

6 Gifts and bribing

The distinction between corruption and gifts and business courtesies can be difficult to draw and due care must therefore be exercised. We do not offer or accept expensive or extravagant gifts or business courtesies. Nor do we offer or accept any cash or cash equivalents as gifts.

You shall always exercise caution in relation to offering or accepting gifts and business courtesies. You shall not accept gifts or other remuneration if there is reason to believe that its purpose is to improperly influence business decisions.

If in doubt, always consult your manager or poLight management.

7 Corruption

poLight has zero tolerance to all forms of corruption. poLight competes and wins contracts in the marketplace on the basis of having the best solution, products, and services at competitive prices.

You shall not accept or offer gifts or other remuneration if there is reason to believe that its purpose is to improperly influence business decisions.

If you have any suspicions contact your manager or poLight management.

8 Money Laundering

poLight is firmly opposed to any form of money laundering. As poLight acts in international markets, every employee shall pay attention to possible money laundering from illegal actions. If you have any suspicions contact your manager or poLight management.

9 Data Protection

Sensitive information, including personal data of our personnel and business associates, shall be protected from damage, loss, or corruption. Key focus areas for poLight's data protection strategy are data security, data availability and access control.

10 Accounting and reporting

poLight shall always maintain accurate and complete Company records. All transactions between poLight and other parties shall be promptly and accurately entered into our accounting system records. All financial reporting shall be in accordance with existing laws and accounting practices and principles, also in respect to timing and content.

11 Procedure for whistleblowing

In situations where the employee is aware of any infringement of the COC he/she shall raise the issue with his/her manager. If this is not possible the employee shall report the infringement directly to the HR responsible in poLight AS or to the Chairman of the Board. Failure to do so is itself a breach of this Code. Incidents may be reported and handled confidentially if desired. poLight does not allow reprisals of any kind against those who, in good faith, report an infringement or suspicion of an infringement of the rules or guidelines.

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