

Code of Conduct

The Code of Conduct applies to all businesses and employees of Qualphot Inc. Compliance with the Code helps to sustain and enhance the good reputation of the Company and contributes to long term value creation for the company.

Compliance with Laws

Employees and agents, are required, as a minimum standard, to comply with all the laws and regulations of the countries in which they operate.

Competition

Compete fairly and vigorously. Qualphot does not engage in any agreements or business practices that are anti-competitive.

Business Behavior

Employees are expected to act with integrity at all times to safeguard the trust in which Qualphot is held by its customers, suppliers and other individuals and organizations with which our businesses interact. No employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interest with Qualphot, or which might compromise their ability to meet the responsibilities of their job. Qualphot does not offer, promise, give, demand or accept bribes or other unethical advantage in order to obtain, retain or give business or other advantage. Employees who have access to privileged information (including proprietary and confidential information, whether belonging to Qualphot or others) must not use it to achieve personal gain for themselves or others. Employees must ensure proper and responsible use of all company assets, including physical property, intangible assets, IT equipment and communication resources.

Dealings with Suppliers, Business Partners and Customers

Suppliers are paid promptly within agreed terms of business. Qualphot seeks to provide its customers with products and services, which meet or exceed their requirements, through the application of quality management systems and continuous improvement programmes. These are designed to develop and apply innovative ideas, to respond quickly to changing customer demand and to improve continuously product quality, value and delivery times. Qualphot believes in working in partnership with its suppliers, so as to meet the expectations of customers, and to ensure quality, value and timeliness throughout the supply chain. Employees must respect and treat in accordance with agreed terms the technology, intellectual property, confidential information and any other assets or data received from customers, suppliers and others. Qualphot expects agents, suppliers and others working on its behalf to act lawfully and ethically, and in accordance with the values and standards set out in this Code.

Employees

Qualphot recruits, selects, and promotes employees on the basis of their qualifications, skills, aptitude and attitude. In employment related decisions, Qualphot complies with anti-discrimination requirements in the relevant jurisdictions concerning matters of race, colour, national origin, gender, marital status, sexual orientation, religious belief, age or physical or mental disability. All Qualphot employees shall be treated with respect and dignity. Accordingly, any harassment or bullying is unacceptable. Qualphot respects the rights of each employee to join or not join a trade union or other bona fide employee representative organization. Qualphot believes in good communications with employees and in promoting consultation, co-operation and teamwork on matters of mutual concern.

Health, Safety and Security

Qualphot is committed to conducting all its activities in a manner which achieves the highest practicable standards of health and safety.

Qualphot seeks to protect its employees, physical assets, information and reputation from potential security threats.

Environment

Qualphot is committed to ensuring that, as far as reasonably practicable, any detrimental effects of its activities, products and services upon the environment are minimized.

Communities

In addition to the provision of employment opportunities and training and development activities, Qualphot seeks to contribute to the communities in which it operates by participation in, and support for, community and charitable initiatives. Qualphot properly pays the taxes arising on its operations and activities whenever and wherever due.

Public Activities

As and when appropriate, Qualphot engages with governments, government departments, agencies and other organizations in relation to issues which affect its legitimate business interests, either directly or through trade associations or other similar bodies.

Human Rights

Qualphot seeks to uphold all internationally recognized human rights wherever its operations are located. Qualphot adheres to all relevant government guidelines designed to ensure that products are not incorporated into weapons or other equipment used for the purposes of terrorism or abuse of human rights.

Reporting and Internal Controls

Qualphot records all business transactions accurately, prudently and transparently, in compliance with the accounting policies as detailed in the Qualphot Inc. Annual Report & Accounts and in accordance with best practice. Comprehensive assessment and management of risk, together with strong systems of internal control, are essential aspects of Qualphot structure and serve to ensure that it is managed effectively and that reported results are accurate.

Application and Compliance

Our Code applies throughout Qualphot and to all its employees worldwide. It serves as a governing document to which other policies must adhere. Where a Qualphot company is a participant in any joint venture or commercial sharing arrangement, Qualphot seeks, as far as practicable, to ensure that the combined vehicle complies with our Code. Qualphot expects and encourages employees to bring promptly to management's attention any suspected or actual breaches of our Code. Any employee making such information known through the appropriate channels will not face any adverse or unfavorable treatment for such disclosure.

Obtaining Advice and Reporting Issues

Any queries, requests for guidance or reports of alleged breaches in relation to the Code can be raised to Human Resources department.