

Business Ethics and Code of Conduct Policy for Employees, Suppliers/Subcontractors

The Code of Conduct of OMON Group Inc. defined as the principle to establish a Policy. It is to ensure that working conditions are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible, conducted ethically and free from bribery and corruption. The Policy is also expected as guidance to meet local laws and regulations, customer's requirements, and Company's vision, mission and values. In addition to this, we also take considerations that Subcontractors and Suppliers will accept this Policy in which both parties will be benefits.

Policies for Suppliers / Subcontractors declares as assign herewith:

1. Management System

*Company commitment on corporate social and environmental responsibility policy statements affirming that company must commit to comply and have a continual improvement endorsed by executive management and posted in the facility in the local language.

*Management accountability and responsibility clearly identifies senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

*Risk assessment and Risk management process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with employee operations.

2. Environment Protection, Health & Safety

*That the Company Permits and Reports are required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

*Company Pollution Prevention and Resource Reduction is the use of resources and generation of waste of all types, including water and energy. This should be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation and recycling of materials.

*Company Hazardous Substances Chemicals and other materials posing a hazard if released to the environment are subject to be identified and managed to ensure their safe handling, movement, storage, use, recycling and disposal.

*Company Wastewater and Solid Waste shall implement a systematic approach to identify, manage, reduce, and responsibly dispose. Wastewater generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. Additional measures should be implemented to reduce generation of wastewater. Participant shall conduct routine monitoring of the performance of its wastewater treatment systems.

*Company Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Participant shall conduct routine monitoring of the performance of its air emission control systems.

3. Business Ethics

*Integrity should be upheld in all business interactions. Participants shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Participant's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

*Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

*Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or mis-representation of conditions or practices in the supply chain is unacceptable.

*Intellectual Property - Respect is given to intellectual property right. Transfer of technology is carried out protecting the intellectual property rights, including protection of customer information.

4. Labor Practice and Human Rights

*Freely Chosen Employment, as part of the hiring process, workers must be provided with a written employment agreement that contains a description of terms and conditions of employment prior to the worker before he/she being hired. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

*Wages and Benefits Compensation paid to workers shall comply with all applicable wage laws, including those related to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

*Human Treatment must be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

*Non-Discrimination should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

*Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles,

and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventive maintenance and safe work procedures (including lockout/tagout), and ongoing safety training should be provided by the company.

*Machine Safeguarding Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

*Sanitation, Food, and Housing Workers are to be provided with ready access to clean toilet facilities, portable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Employer or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress.

5. Anti-Bribery and Anti Corruption

5.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

5.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

5.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

5.4 Bribery is illegal. Employee must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

5.5 What is and what is NOT acceptable

5.5.1 Gifts and hospitality – OMON Group Inc. accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- i. It is not offer to, or accepted from, a government official or representative or politician or political party

* As good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed.

5.5.2 Facilitation Payments and Kickbacks

* We do not accept and will not make any form of facilitation payments of any nature. We recognize that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognize that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

* We do not allow kickbacks to be made or accepted. We recognize that kickbacks are typically made in exchange for a business favour or advantage.

* We recognizes that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum
- b. Ask for a receipt, detailing the amount and reason for the payment
- c. Create a record concerning the payment
- d. Report this incident to your line manager

5.5.3 Political Contributions

We will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognize this may be perceived as an attempt to gain an improper business advantage.

5.5.4 Charitable Contributions

* We accept (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

* Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

* We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.