Helinox The Code of Conduct for Manufacturers

Helinox makes the utmost effort to create a fair, safe, and nondiscriminatory work environment for employees producing our products. Helinox's code of conduct for manufacturers (hereinafter the "Code") backs up such promise and defines the requirements necessary to maintain the cooperative relationships with Helinox.

- The Code applies to all parties providing goods or services to Helinox.
- The Code is based on the principles of International Labor Organization (ILO) and internationally recognized fairlabor practices, and the manufacturers shall be subject to the standard of the industry, the standard of Helinox or the relevant legal requirements, whichever is stricter.

Helinox monitors the compliance of such standards by the manufactures and encourages the pursuit of a continuous improvement model and recommends the manufacturers to voluntarily operate social compliance programs.

Transparency

The manufacturers are required to communicate with Helinox regarding their business practices in an open and honest manner, which includes maintenance and provision of accurate and complete pay records and employees' personnel records at the request of Helinox, complete disclosure of facilities producing Helinox products, and situations concerning other interests, etc.

Anti-Discrimination

Any decisions on employees' personnel status change including employment, promotion, treatment, and termination of employment relations, etc. shall be made based on the qualifications and abilities of each employee. The manufacturers shall not discriminate against employees based on gender, race, religion, age, disability, sexual orientation, nationality, political view, social group, or ethnicity.

Harassment and Violence

The manufacturers shall not take physical and psychological disciplinary action. The manufacturers shall neither commit threats of violence, sexual harassment, or psychological abuse, etc. against employees nor participate in such activities.

Recruitment and Employment

Voluntary Employment: The manufacturers shall not use any kind of forced labor whatsoever such as detention, apprenticeship or bonded labor, etc.

Minimum Age for Employment: The employers shall not employ any person under the local labor law in any facilities in violation of the applicable laws.

Persons who can work based on the local law as minors shall not be employed at night or in hazardous conditions. Also Jobs that harm the development of minors' bodies, intelligence, and personality stipulated in the local's labor law are also prohibited.

Freedom of Association and Collective Bargaining Right

The manufacturers shall not take physical and psychological disciplinary action. The manufacturers shall neither commit threats of violence, sexual harassment, or psychological abuse, etc. against employees nor participate in such activities.

Work Hours

Work hours shall not exceed time which based on the local law (Perhour, week, month, year) a regular schedule except in unforeseen circumstances, The manufacturers shall comply with any applicable laws and regulations relating to working conditions of employees. In case that overtime is required, reasonable overtime allowances need to be paid to employees pursuant to the law. Employees are entitled to receive a day of holiday if they work consecutively for 7 days without any holiday.

· Wage and Allowance

The manufactures shall be subject to all legal requirements or local industry standards, whichever is stricter, regarding wages and allowances in a country where their business is operated.

Health and Safety

The manufacturers are required to provide a safe and healthy work environment to employees by complying with all applicable laws and regulations. The same standards shall apply to residential facilities provided by the manufacturers.

Environment

The manufacturers shall comply with all applicable environment laws and regulations and actively take actions to relieve a negative impact on the health of mankind and the environment.

Local Community

Helinox encourages the manufacturers to directly participate in a business improving the social welfare of employees and their families in the local community or participate in such business through partnership.

Monitoring the Compliance of the Code by the Manufacturers

Helinox may regularly review the Code and add or amend the terms of the Code if necessary. If the manufacturers violate any of the provisions in the Code, Helinox may additionally exercise the following rights entirely at its discretion independent of rights of Helinox under contracts entered into between Helinox and the manufacturers.

- 1. Terminating the relationship with the relevant manufacturer including cancellation of any unpaid orders.
- 2. Requesting rectification of the violations within a reasonable period or introducing an adequate compliance program so that the business relationship can continue or be resumed.