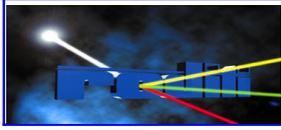


RODITI CODE OF CONDUCT

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1) Acting Honestly and Ethically

The Roditi International Corporation Ltd believes in fostering a diverse, inclusive work environment where all ideas, perspectives, and backgrounds are considered. Likewise, we feel strongly that our health and safety are paramount to the work we do. To this end, our company provides a safe place to work where ideas and productivity can thrive. We do not engage in any form of discrimination based on gender, race, religion, sexual orientation, colour, age, ethnicity, disability, pregnancy, political affiliation, union membership or marital status.

2) Health & Safety

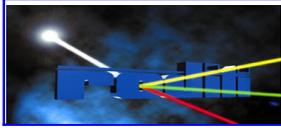
Our company only works with suppliers that can ensure, so far as is reasonably practicable, that:

- the workplaces, machinery, equipment and processes under their control are safe and without risk to health;
- the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and
- where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

Worker exposure to potential safety hazards is minimised through proper design, engineering and administrative controls, preventative maintenance and safe work procedures as well as by ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are provided with appropriate, well-maintained, personal protective gear. Workers are not disciplined for raising safety concerns.

Emergencies and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and extinguishing equipment, adequate exit facilities and recovery plans.

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage the worker to report, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and to help workers return to work.



Workers are provided with ready access to clean toilet facilities, water fit for human consumption and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the factories are kept clean and safe and provided with appropriate emergency exits, hot water for bathing or showering, and adequate heat and ventilation, as well as reasonable personal space along with fair entry and exit privileges.

3) Human Rights

The Roditi International Corporation Ltd believes in promoting human rights throughout our organisation. In doing so, we adhere to all wage and hour laws in the locations we operate. We also do not use or condone unlawful child or forced labour and do not conduct business with those who do. Just as importantly, our suppliers do uphold individual rights, including wage and hour laws, in the work they perform for us.

Furthermore, we can confirm suppliers do promote and comply with international standards for human rights.

Forced, bonded or indentured labour or involuntary prison labour are not in use. All work is voluntary, and workers are free to leave upon reasonable notice. Our workers are not be required to lodge government-issued identification, passports or work permits to the factories as a condition of employment.

Our company also does not tolerate any form of unlawful harassment, bullying, threats or acts of violence, or disrespectful behaviour by or toward our suppliers.

4) Working Hours

Workweeks do not to exceed the maximum set by local law. Further, a normal work week do not on a regular basis exceed 60 hours per week, including overtime.

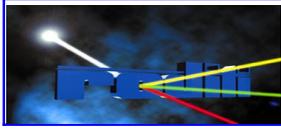
All overtime work is voluntary, other than as permitted in the following:

Where the company is a party to a collective bargaining agreement freely negotiated with labour organisations representing a significant portion of its workforce, it may require overtime work under such agreement to meet short-term business demand.

Workers are allowed at least one day off per seven-day week.

5) Wages and Benefits

Wages paid for a normal workweek do always meet at least legal or industry minimum standards. They are sufficient to meet the basic needs of personnel and to provide some discretionary income.



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In compliance with local laws, workers are to be compensated for overtime at pay rates greater than regular hourly rates.

Deductions from wages are not be permitted as a disciplinary measure.

The basis on which workers are paid is specified promptly via a pay stub or similar documentation.

6) Freedom of Association

The Roditi International Corporation Ltd respects the rights of workers to associate freely, to join or not to join labour unions, to seek representation, join workers' councils per local legislation, etc.

Workers can communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

Where the right to freedom of association and collective bargaining is restricted under national legislation, the Supplier shall allow workers to elect their own representatives freely.

7) Fair, Ethical Relationships with Others

The Roditi International Corporation Ltd, confirm our suppliers do provide us with accurate and truthful information about their products and services, just as we do for our customers.

Our suppliers are to abide by international competition laws.

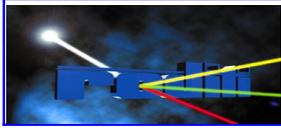
8) No Corrupt Practices

The Roditi International Corporation Ltd, believes in doing business fairly and free of any corrupt influence. We adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

Money laundering is utterly forbidden.

9) Trade Compliance

Customers around the world enjoy our products. We, The Roditi International Corporation Ltd, are expected to comply with international trade laws. This extends to our compliance with the various export and import controls that apply to our work. And our suppliers do the same.



10) Protecting Assets and Information

Our resources and customers' information are used at all times in a way that is safe, ethical, and lawful.

Information regarding business activities, structure, financial situation and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices.

Intellectual property rights are respected; the transfer of technology and know-how is done in a manner that protects intellectual property rights.

Standards for fair trading, advertising and competition are upheld. Appropriate means are available to safeguard customer information.

Structures are in place to implement and to ensure confidentiality and protection of our suppliers and employees raising concerns.

For the supply of components for military products, management, and each employee do maintain full transparency, knowing they are part of the value chain in the defence industry.

11) The Environment

Our company makes the environment a priority and our suppliers do have an effective environmental policy and comply with existing legislation and regulations regarding the protection of the environment. Our suppliers support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

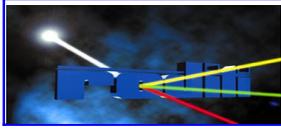
12) Chemical and Hazardous Materials

Chemical and other materials posing a hazard if released to the environment are identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

13) Waste water and Solid Waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are monitored, controlled and treated as required before discharge or disposal.

14) Air Emissions



Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals and combustion by-products generated from operations are characterised, monitored, controlled and treated as required before discharge.

15) Greenhouse Gases

Our suppliers are expected to identify, measure and report greenhouse gases generated from operations. Plans are established for how to reduce GHG emissions.

16) Water

In areas vulnerable to a scarcity of fresh water, our factories are seeking ways to measure and disclose the use of freshwater. Plans are also established for how to reduce the use of freshwater in operations.

17) Environmentally friendly technologies

Our factories choose environmentally effective technologies in their production processes, apply environmentally active components and to strive to increase the use of technologies that reduce emissions of greenhouse gases.

18) Environmental Permits and Reporting

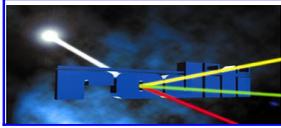
All required environmental permits, approvals and registrations are obtained, maintained and kept current and their operational and reporting requirements are followed.

19) Conflict Minerals

The Roditi International Corporation Ltd is determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals.

To support the responsible sourcing of minerals within our supply chain, our suppliers are, with regards to certain minerals; Tin, Tantalum, Tungsten and Gold (including their derivatives) originating in the Democratic Republic of the Congo or its surrounding countries, expected to have in place a supply chain policy and processes to undertake:

- a reasonable inquiry into the country of origin of Conflict Minerals incorporated into products; and
- due diligence (with reference to OECD/CFSI guidance or similar) of its supply chain, as



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necessary, to determine if Conflict Minerals sourced from the Covered Countries directly or indirectly support unlawful conflict there; and

- risk assessment and mitigation actions necessary to implement the country of origin inquiry and due diligence procedures.

June 2020

The Roditi Internatioanl Corporation Ltd

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