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Code of Conduct – Xindao B.V.

This Xindao (Shanghai) Co. Ltd. Code of Conduct ("Code of Conduct") outlines the basic requirements concerning working conditions that must be satisfied by all vendors ("Vendors"). Xindao (Shanghai) Co. Ltd. ("Xindao") is free to supplement these requirements at any time.

Child Labor

Vendors shall not use child labor. "Child" is defined as a person who is not older than the local age for completing compulsory education but in no event is less than 15 years of age. Vendors must verify the age of their workers and maintain copies of their workers' proof of age. Vendors must follow all applicable laws and regulations in China with regard to working hours and conditions for minors.

Involuntary Labor

Vendor shall not use involuntary labor. "Involuntary Labor" is defined as work or service which is extracted from any person under threat or penalty for its non-performance and for which the worker does not offer himself or herself voluntarily, and includes all manner of prison, bonded, indentured and forced labor.

Disciplinary Practices

Vendors shall not use corporal punishment or any other form of physical or psychological coercion or intimidation against workers.

Non-discrimination

Vendors shall employ workers solely on the basis of their ability to do the job, and shall not discriminate on the basis of age, gender, racial characteristics, maternity or marital status, nationality or cultural, religious or personal beliefs or otherwise in relation to hiring, wages, benefits, termination or retirement.