

Emerging Display Technologies Corp.

Social and Environmental Responsibility (SER) Code of Conduct

1. STATEMENT

As a member of the international business community, Emerging Display Technologies Corp. (hereinafter refer to “EDT”) recognizes and commits to social and environmental responsibility. The objective of this Code of Conduct (hereinafter refer to “CoC”) is to provide a reference point to guide EDT and EDT’s factory — Dong Guan Emerging Display Ltd. (hereinafter refer to “EDT DG”), including all management and employees, on the elements that drive the conduct of EDT’s business and relationships.

Codes set out in this CoC were derived from three disciplined sources which are: a) the member obligations of the industrial associations which EDT is a member, and the international standard institutes to which EDT’s business is related; b) the laws covering national regions where EDT deploys operations; and c) the internal leadership of EDT who determine voluntary upgrading of performance standards. Each source represents a different commitment level of EDT’s promised delivery to the diverse stakeholders, which include EDT’s employees, customers, suppliers, the community, investors, and non-governmental organizations.

In recognizing inherent discrepancies that may exist among the above three sources, EDT pledges to live up to the most stringent rules based on whichever source determines a higher standard. On the policy level, none of EDT’s documented codes should override local laws, and all the codes should defer substantially to any national and international organization whose provisions subsume EDT’s operational or product areas. In terms of implementation, EDT should on a continuous and constant basis compare CoC with the provisions set by international organizations and local applicable laws. EDT should refer to RBA(Responsible Business Alliance) Code of Conduct periodically to regulate our conduct of social responsibility in business activities. To ensure compliance with such provisions and laws, EDT should honor the above principle as paramount in any version of the CoC, and should work closely with local law-enforcement entities to close any gap between the released CoC and the current law. Any non-conformance with laws should be notified to customers together with continuous improvement plans.

EDT commits to ensuring that our business is in all respects conducted in conformance with ethical, professional and legal standards. With the aim of becoming an SER-compliant supply-chain partner with customers, EDT declares in CoC to respect all industrial rules, applicable laws, human rights, environmental conservation, and safety of products and services in the countries and regions in which EDT and EDT DG operates, and to conduct the business activities in an honest and ethical manner. Simultaneously, EDT’s downstream suppliers are required to comply with this CoC to the same level of standards.

2. PURPOSE

This CoC, for internal purposes, is to make SER become part of EDT's core competencies. For external purposes, this CoC is to demonstrate EDT's core values. Maintaining high standards for implementing this CoC is EDT's goal, to ensure continued customer trust in us and to enhance EDT's image as a competitive company in the industry in both business and SER respects.

3. RBA POLICIES

EDT commits to fulfill social responsibility to reach the objective of sustainable development. EDT sets out the following policies according to this CoC to enhance the spirit of SER and regards them as our declaration and commitment of RBA management.

- ◆ Maintain good working environment and guarantee employees' basic rights.
- ◆ Identify risks to prevent occupational hazard.
- ◆ Obey environmental regulation and implement green products life cycle management.
- ◆ Implement corporate social responsibility as a member of "Global Citizen".
- ◆ Adhere to EDT's business philosophy — "Quality", "Honor", "Sincerity" and "Innovation" and cultivate the ability of continuing improvement.
- ◆ Advance the transparency of information disclosure to shareholders.
- ◆ Incorporate social and environmental responsibility to EDT's business culture and operation activities.
- ◆ Publish annual CSR report that meet GRI standard to deliver EDT's policy and outcome of social and environmental responsibility.

4. RESPONSIBILITIES

This CoC is to set up the standards which EDT will support and be guided by in the conduct of business. To achieve the objective of this CoC effectively, EDT should regulate responsibilities of organization and staff. Meanwhile, EDT continues to develop an internal validation audit mechanism to ensure conformance with and fulfillment of this CoC in each facility. The management (chief of each department) of EDT and EDT DG should require related employees who are most tied to the local conditions and constraints to build capabilities in both SER training and auditing knowledge to promote the audit mechanism. EDT's internal audits are carried out by using internal professional staff teams or by resorting to external third-party service institutes annually or quarterly as per EDT's demands. Audits cover the areas of labor, health and safety, environment, ethics, and SER management systems, which are required under the standard of RBA.

- a. Management representative: The President & CEO of EDT is the main sponsor and management representative of this CoC, and he will monitor adherence to this CoC.
- b. Chief of each department of EDT and EDT DG: Responsible for entrenching and monitoring compliance with this CoC, and providing feedback to the President & CEO regarding local practices contravening the CoC.
- c. Environment security management dept. of EDT and EDT DG: Responsible for setting up relative regulations, training and auditing about health and safety, and the environment.

- d. Administration dept. of EDT and EDT DG: Responsible for setting up relative regulations, training and auditing about labor.
- e. Quality assurance/procurement dept. of EDT and EDT DG: Responsible for setting up relative regulations, training and auditing about restriction on the use of conflict minerals.
- f. Audit dept./legal personnel of EDT and chief of EDT DG: Responsible for setting up relative regulations, training and auditing about ethics, management system, and anti-corruption policy.
- g. All employees: Following this CoC.

5. SCOPE

This CoC applies to EDT and EDT's factory — EDT DG.

Failure to comply with this CoC will be taken seriously and, depending upon the circumstances, could result in disciplinary action. To ensure that EDT and EDT DG manage and conduct business in line with this CoC, all management of EDT and EDT DG are required to report on their performance against this standard annually, submit corresponding improvement plans, and jointly work with the President & CEO on social and environmental events related to the matters specified in this CoC.

6. CoC STANDARD

This CoC is founded on the basis of EDT's SER philosophy and is made up of seven sections. Sections I, II, and III outline standards for Labor, Health and Safety, and the Environment, respectively. Section IV adds standards relating to business ethics; Section V outlines the elements of an acceptable system to manage conformity to this CoC. Sections VI and VII state EDT's policy on conflict minerals and anti-corruption, which are mandated to be obeyed.

I. LABOR

EDT is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards such as Universal Declaration of Human Rights, ILO International Labor Standards and Ethical Trading Initiative were used as references in preparing this CoC. EDT's labor standards are:

1) Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the

employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration 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.

2) Young Workers

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. EDT shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. EDT shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating 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 not 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.

5) Humane Treatment

There is to 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.

6) Non-Discrimination

EDT should be committed to a workforce free of harassment and unlawful discrimination. EDT 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, covered veteran status, 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.

7) Freedom of Association

In conformance with local law, EDT shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

II. HEALTH and SAFETY

EDT recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. EDT also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing this CoC. EDT's health and safety standards are:

1) Occupational Safety

Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

2) Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

3) Occupational Injury and Illness

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

4) Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.

5) Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

6) 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.

7) Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by EDT or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8) Health and Safety Communication

EDT shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.

III. ENVIRONMENTAL

EDT recognize that environmental responsibility is important to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing this CoC. EDT's environmental standards are:

1) Environmental Permits and Reporting

All 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.

2) Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

3) Hazardous Substances

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

4) Solid Waste

EDT shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

5) Air Emissions

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. EDT shall conduct routine monitoring of the performance of its air emission control systems.

6) Materials Restrictions

EDT is to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

7) Water Management

EDT shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. EDT shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8) Energy Consumption and Greenhouse Gas Emissions

Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. EDT is to look for cost-effective methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions.

IV. ETHICS

To meet social responsibilities and to achieve success in the marketplace, EDT and the agents are to uphold the highest standards of ethics including:

1) Business Integrity

The highest standards of integrity are to be upheld in all business interactions. EDT shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

2) No Improper Advantage

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. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3) Disclosure of Information

All business dealings should be transparently performed and accurately reflected on EDT's business books and records. Information regarding 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 misrepresentation of conditions or practices in the supply chain are unacceptable.

4) Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer and supplier information is to be safeguarded.

5) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld.

6) Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. EDT should have a communicated process for our personnel to be able to raise any concerns without fear of retaliation.

7) Responsible Sourcing of Minerals

EDT shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products we manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. EDT shall exercise due diligence on the source and chain of custody of these minerals and make our due diligence measures available to customers upon customer request.

8) Privacy

EDT is to commit to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. EDT is to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

V. MANAGEMENT SYSTEM

EDT shall adopt or establish a management system whose scope is related to the content of this CoC. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to EDT's operations and products; (b) conformance with this CoC; and (c) identification and mitigation of operational risks related to this CoC. It should also facilitate continual improvement.

The management system should contain the following elements:

1) Company Commitment

A corporate social and environmental responsibility policy statements affirming EDT's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

2) Management Accountability and Responsibility

EDT clearly identifies senior executive and company representative responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

3) Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this CoC.

4) Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with EDT's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5) Improvement Objectives

Written performance objectives, targets and implementation plans to improve EDT's social and environmental performance, including a periodic assessment of EDT's performance in achieving those objectives.

6) Training

Programs for training managers and workers to implement EDT's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

7) Communication

A process for communicating clear and accurate information about EDT's policies, practices, expectations and performance to workers, suppliers and customers.

8) Worker Feedback, Participation and Grievance

Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this CoC and to foster continuous improvement.

9) Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this CoC and customer contractual requirements related to social and environmental responsibility.

10) Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11) Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to EDT's requirements along with appropriate confidentiality to protect privacy.

12) Supplier Responsibility

A process to communicate CoC requirements to suppliers and to monitor supplier compliance to this CoC.

VI. Restriction on the Use of Conflict Minerals

EDT hereby pledges its commitment to obey international and industrial provisions on conflict minerals. EDT does not accept and does not use conflict minerals originating from the Democratic Republic of the Congo and its adjoining countries and regions. EDT requires suppliers to trace the origins of all products containing potential conflict minerals, including gold (Au), tantalum (Ta), tin (Sn) and tungsten (W), and provide relevant information sources to EDT. In addition, EDT's downstream suppliers are required to fulfill their due diligence on free conflict minerals pursuant to the relevant laws requirements.

VII. Anti-Corruption Policy

EDT upholds a culture of honesty and trust, conducts ourself with integrity, and is committed to full compliance with the national and international anti-corruption and anti-bribery laws and regulations, and imposes a no-tolerance policy on any unlawful activities. Any and all means of corruption, extortion, embezzlement, and undue or improper advantage are strictly prohibited in EDT. All employees should take at least two hours of anti-corruption training per year. In addition, EDT assists downstream suppliers, manufacturers and customers in adhering to the highest anti-corruption laws as a binding condition and an integral part of doing business.

7. ENFORCEMENT OF THE CoC

This CoC approved by the President & CEO will be defined as an ethical commitment that includes basic principles and standards for the appropriate development of relations between EDT and our main stakeholders (employees, customers, shareholders, suppliers, the community, investors, and non-governmental organizations). The spirit and guidance embodied in this CoC must be followed by all our employees and managers. The management of EDT and EDT DG must provide annual assurance that this CoC is being adhered to within our business operations.

The management of EDT and EDT DG also needs to roll out the approved CoC to our employees. This should take place in a variety of ways, reflecting the different cultures. Employees' rights, this CoC requirements, and expectations documented in this CoC should be communicated to all staff through employees' labor contracts, employees' handbooks, and other channels which convey the need for effective and exact implementation of and adherence to this CoC.



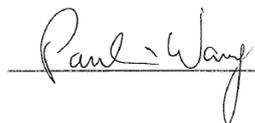
EDT should also perform auditing, and design programs as validation instruments for ongoing training and awareness of candid execution of this CoC. The programs to substantiate this CoC should employ a comprehensive audit protocol, which is designed to assess performance at EDT and EDT DG and yield a standardized scorecard system to establish a baseline for tracking improvements and making comparisons with peer companies. Furthermore, it is considered that any deployed system should provide for complaints and suggestions, and therefore whistle-blowing mechanisms and grievance channels must be established in order to seek improvements. By formally documenting and revising this CoC, EDT aims for continuous organizational improvement and innovative governance practices. EDT is devoted to sustainable development and an all-win outcome for stakeholders.

8. VERSIONS

This CoC was signed and approved by management representative on November 13, 2015.
The first amendment was approved on January 18, 2016.
The second amendment was approved on December 21, 2017.
The third amendment was approved on March 26, 2018.

Issued by:

EDT's President & CEO

 Paul Wang March 26, 2018