




SMART Technical Services Co., Ltd.

	Prepared By	Approved By
Signature		
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Position	QMR	Managing Director
Date	01.01.2015	01.01.2015

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	CODE OF CONDUCT FOR SUPPLIER	Effective Date : 01/01/ 2015 Issue Date : 01/01/2015 Issue No. : 1.0 Page : 2 of 5

General Standards

SMART is committed to the highest standard of social and environment responsibility, integrity, ethical conduct. Our Supplier Code of Conduct establishes standards for our valued supplier to operate in accordance with the SMART's Compliance principles and all other applicable laws and regulations. This Code of Conduct shall apply to all supplier who works for or with SMART.

At SMART, We shall treat the workers with respect and dignity, and business operations are environmentally responsible and conducted ethically. For the code to be successful, suppliers must regard the Code as a total supply chain initiative. At a minimum, suppliers shall also require their next tier suppliers to acknowledge and implement the Code. SMART will assess and monitor its supplier's compliance with the Code, and may consider ending business relationships with supplier which do not meet with our standard of code of conduct. Our aim to make the business together and achieve the great success by doing the right things at all times.

A) Conflict of Interest

We SMART are expected to give our undivided business loyalty when conducting our job-related duties. Conflict of interest may occur when individual's outside activities or personal interest conflict or appear to conflict with his or her responsibilities to SMART. Employees of SMART should act in the best interest of the company. Accordingly, employees should have no relationship, financial or otherwise, with any supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of SMART Company.

Avoiding conflict of interest in all our business decisions is essential to our values of Integrity and Trust.

B) Gifts, Meals and Entertainment


Employees of SMART are prohibited from accepting anything more than modest gifts, meals and entertainment from suppliers. Ordinary business meals and small tokens of appreciation such as gift baskets which amount are not more than USD 25, at holiday time generally are fine, but suppliers should avoid offering the travel tickets, frequent meals or expensive gifts. gifts of cash or cash equivalents, such as gifts card and others special gifts are never allowed.



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C) Business and Financial Records

Suppliers shall maintain accurate and transparent books, records and accounts to demonstrate compliance with applicable laws and regulations and this Code. Supplier shall perform periodic evaluations of its facilities and operations, and the facilities and operations of its subcontractors and next-tier suppliers to ensure compliance with this Code.

Both the supplier and SMART must keep accurate records of all matters related to the supplier's business with the SMART Company. This includes the proper recording of all expenses and payments. If SMART Company is being charged for a supplier employee's time, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

D) Bribery

Supplier shall not engage in any form of bribery, kickbacks, corruption, extortion or embezzlement. And also supplier must not transfer anything of value, directly or indirectly to the government official employee of a government controlled company, or political party, in order to obtain any improper benefits or advantages. Suppliers must keep a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of SMART company. Suppliers must furnish a copy of this accounting to the SMART upon request.

E) Protecting Information


Supplier should protect the confidential information of SMART Company. An important element of such protection is maintaining the confidentiality of SMART's trade secrets and propriety information. And also to protect confidential information (which includes "Personal Information") to which you have access in connection with your services or products to SMART. Supplier who has been given access to confidential information as



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part of business relationship should not share this information with anyone unless authorized to do so by SMART Company. In the course of working with or for SMART, supplier must not use proprietary information, patented technology or copyrighted software, documentation, or other materials of third parties without authorization. Suppliers are required to abide by these policies when collecting or processing the relevant confidential information.

F) Human Right

Supplier shall promote and maintain discrimination free work place and treat their employees with fairness, dignity and respect. No form of physical, sexual, psychological or verbal harassment or abuse shall be tolerated. Supplier should not ever be subject to illegal discrimination on the basis of age, gender, language, religion, national or social origin and disability or the receipt of public assistance. And also supplier needs to protect community and appreciate diversity in the work place. If there is any violation on Human Right, supplier can report to the SMART Human Right Committee.

G) Environment and Social Responsibility

Protecting the environment and environment responsibility is the core value of the SMART. Our supplier shall develop, implement, and maintain environmentally responsible business practice. Suppliers are responsible for managing, measuring and minimizing the environmental impact of their facilities. Specific focus areas include air emissions, waste reduction, recovery and management; water use and disposal by practicing Reduce, Reuse and Recycle. And also for the social responsibility business, supplier shall take responsible of what impacts to their society.

H) Reporting Risk in Misconduct

Supplier, who believes that employee of SMART or anyone acting on behalf of SMART Company has engaged in illegal or otherwise improper conduct, should report the matter to SMART Company. The suppliers can contact the employee's manager or



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SMART Company Ethics & Compliance Team addressing to doc.compliance.team@gmail.com any time. A supplier's relationship with SMART Company will not be affected by an honest report of potential misconduct.

Enforcement

The Code of Conduct for Supplier places you and in the forefront with those corporations that emphasize the importance of honest business conducts and solid business ethics. Our standards can be met only with your corporation. We SMART trusts that your esteem organization is adhere to the standards of this code, agree to abide by the terms and acknowledge that compliance is required to maintain your status as an SMART Supplier.

Acknowledged By

(Name _____, Title _____)

Company Name -----



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