JYA-NAY CO.,LTD.

BUSINESS ETHICS CODE OF CONDUCT

1. Business Integrity:

Corruption, extortion, embezzlement, fraud or any forms of activities against business ethics are strictly prohibited.

2. No Improper Advantage:

Bribes or other means of obtaining undue or improper advantage or business secret are not to be promised, offered, authorized, given or accepted.

3. Disclosure of Information:

Disclosure of information in compliance with laws and regulations such as occupational safety policy, environmental policy and labor policy.

4. Intellectual Property

Protecting and respecting partners' intellectual property rights; any form of information disclosure without the owners' consent is strictly prohibited.

5. Fair Business, Advertising, and Competition

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

6. Protection of Identity and Non-Retaliation

Ensuring the confidentiality, anonymity and protection of supplier and employee whistleblowers, unless prohibited by law.

7. Responsible Sourcing of Minerals

Policy established to assure that no conflict minerals purchased by Jya-Nay and its suppliers from Democratic Republic of the Congo or an adjoining country.

8. Privacy

Abiding by information security laws and regulatory requirements when the information is collected, stored, processed, transmitted, and shared from suppliers, customers, consumer, and employees.