

Code of Business Conduct, Ethics, and Safety Guide

One of our Company's most valuable assets is its integrity. Protecting this asset is the job of everyone in the Company. To that end, we have established a Code of Business Conduct, Ethics, and Safety. The Code applies to every officer, director and employee. We also expect that those with whom we do business (including our agents, consultants, suppliers and customers) will also adhere to the Code.

All of the Company's officers, directors and employees must carry out their duties in accordance with the policies set forth in this Code and with applicable laws and regulations. To the extent that other Company policies and procedures conflict with this Code, you should follow this Code unless otherwise specifically provided herein. Any violation of applicable law or any deviation from the standards embodied in this Code will result in disciplinary action up to and including termination. Disciplinary action also may apply to an employee's supervisor who directs or approves the employee's improper actions, or is aware of those actions but does not act appropriately to correct them. In addition to imposing its own discipline, the Company may also bring suspected violations of law to the attention of the appropriate law enforcement personnel. If you are in a situation which you believe may violate or lead to a violation of this Code, follow the procedures described in the attached Policy.

ISE Labs Code of Business Conduct and Ethics has policies encouraging individual and peer integrity, ethical behavior and our responsibilities to our employees, customers, suppliers, stockholders, and the public, this includes:

- ***Prohibiting conflicts of interest (including protecting corporate opportunities)***
- ***Protecting our confidential and proprietary information and that of our customers' and vendors'***
- ***Treating our employees, customers, suppliers and competitors fairly***
- ***Encouraging full, fair, accurate, timely and understandable disclosure***
- ***Protecting and properly using company assets (including any and all personnel information)***
- ***Complying with laws, rules and regulations (including insider trading laws)***
- ***Encouraging the reporting of any unlawful or unethical behavior***

Policy Statement

The Company provides a code of conduct for all of its directors, officers and employees. This Company is committed to being a good corporate citizen. The Company's policy is to conduct its business affairs honestly and in an ethical manner. That goal cannot be achieved unless you individually accept your responsibility to promote integrity and demonstrate the highest level of ethical conduct in all of your activities. Activities that may call into question the Company's reputation or integrity should be avoided. The Company understands that not every situation is black and white. The key to compliance with the Code is exercising good judgment. This means following the spirit of this Code and the law, doing the "right" thing and acting ethically even

when the law is not specific. When you are faced with a business situation where you must determine the right thing to do, you should ask the following questions:

Am I following the spirit, as well as the letter, of any law or Company policy?

Would I want my actions reported publicly?

What would my family, friends or neighbors think of my actions?

Will there be any direct or indirect negative consequences for the Company?

Managers set an example for other employees and are often responsible for directing the actions of others. Every manager and supervisor is expected to take necessary actions to ensure compliance with this Code, to provide guidance and assist employees in resolving questions concerning the Code and to permit employees to express any concerns regarding compliance with this Code. No one has the authority to order another employee to act contrary to this Code.

1. Compliance with Laws and Regulations

The Company seeks to comply with both the letter and spirit of the laws and regulations in all countries in which it operates.

The Company is committed to full compliance with the laws and regulations of the cities, states and countries in which it operates. You must comply with all applicable laws, rules and regulations in performing your duties for the Company. Numerous federal, state and local laws and regulations define and establish obligations with which the Company, its employees and agents must comply. Under certain circumstances, local country law may establish requirements that differ from this Code. You are expected to comply with all local country laws in conducting the Company's business. If you violate these laws or regulations in performing your duties for the Company, you not only risk individual indictment, prosecution and penalties, and civil actions and penalties, you also subject the Company to the same risks and penalties. If you violate these laws in performing your duties for the Company, you may be subject to immediate disciplinary action, including possible termination of your employment or affiliation with the Company.

As explained below, you should always consult your supervisor, manager, area Vice President or Human Resources with any questions about the legality of you or your colleagues' conduct.

2. Full, Fair, Accurate, Timely and Understandable Disclosure

It is of paramount importance to the Company that all disclosures in reports and documents that the Company files with, or submits to any public and/or government entities are full, fair, accurate, timely and understandable. You must take all steps available to assist the Company in these responsibilities consistent with your role within the Company. In particular, you are required to provide prompt and accurate answers to all inquiries made to you in connection with the Company's preparation of said reports and disclosures.

The Company's Chief Executive Officer ("CEO"), and President are responsible for designing, establishing, maintaining, reviewing and evaluating on a quarterly basis the effectiveness of the Company's disclosure controls and procedures. The Company's CEO and President and such other Company officers are designated from time to time by the Board of Directors, CEO, or the President shall be deemed the Senior Officers of the Company. Senior Officers shall take all steps necessary or advisable to ensure that all disclosure in reports and documents filed with or submitted to any public and/or government entities, and all disclosure in other public communication made by the Company is full, fair, accurate, timely and understandable.

Senior Officers are also responsible for establishing and maintaining adequate internal control over financial reporting to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. The Senior Officers will take all necessary steps to ensure compliance with established accounting procedures, the Company's system of internal controls and generally accepted accounting principles.

Senior Officers will ensure that the Company makes and keeps books, records, and accounts, which, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the Company. Senior Officers will also ensure that the Company devises and maintains a system of internal accounting controls sufficient to provide reasonable assurances that:

- transactions are executed in accordance with management's general or specific authorization;
- transactions are recorded as necessary (a) to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements, and (b) to maintain accountability for assets;
- access to assets is permitted, and receipts and expenditures are made, only in accordance with management's general or specific authorization; and
- the recorded accountability for assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences, all to permit prevention or timely detection of unauthorized acquisition, use or disposition of assets that could have a material effect on the Company's financial statements.

Any attempt to enter inaccurate or fraudulent information into the Company's accounting system will not be tolerated and will result in disciplinary action, up to and including termination of employment.

3. Special Ethics Obligations for Employees with Financial Reporting Responsibilities

Senior Officers each bear a special responsibility for promoting integrity throughout the Company. Furthermore, the Senior Officers have a responsibility to foster a culture throughout the Company as a whole that ensures the fair and timely reporting of the Company's results of operation and financial condition and other financial information.

Because of this special role, the Senior Officers are bound by the following Financial Officer Code of Ethics, and by accepting the Code of Business Conduct and Ethics each agrees that he or she will:

- Perform his or her duties in an honest and ethical manner.
- Handle all actual or apparent conflicts of interest between his or her personal and professional relationships in an ethical manner.
- Take all necessary actions to ensure full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, government agencies and in other public communications.
- Comply with all applicable laws, rules and regulations of federal, state and local governments.
- Proactively promote and be an example of ethical behavior in the work environment.

4. Insider Trading

You should never trade securities on the basis of confidential information acquired through your employment or fiduciary relationship with the Company.

You are prohibited under both federal law and Company policy from purchasing or selling affiliated Company stock, directly or indirectly, on the basis of material non-public information concerning the Company. Any person possessing material non-public information about the Company and affiliated Companies must not engage in transactions involving affiliated Company securities until this information has been released to the public. Generally, material information is that which would be expected to affect the investment decisions of a reasonable investor or the market price of the stock. You must also refrain from trading in the stock of other publicly held companies, such as existing or potential customers or suppliers, on the basis of material confidential information obtained in the course of your employment or service as a director. It is also illegal to recommend a stock to (i.e., “tip”) someone else on the basis of such information.

5. Conflicts of Interest and Corporate Opportunities

You must avoid any situation in which your personal interests conflict or even appear to conflict with the Company's interests. You owe a duty to the Company not to compromise the Company's legitimate interests and to advance such interests when the opportunity to do so arises in the course of your employment.

You shall perform your duties to the Company in an honest and ethical manner. You shall handle all actual or apparent conflicts of interest between your personal and professional relationships in an ethical manner.

You should avoid situations in which your personal, family or financial interests conflict or even appear to conflict with those of the Company. You may not engage in activities that compete with the Company or compromise its interests. You should not take for your own benefit opportunities discovered in the course of employment that you have reason to know would benefit the Company. The following are examples of actual or potential conflicts:

- you, or a member of your family, receive improper personal benefits as a result of your position in the Company;
- you use Company's property for your personal benefit;
- you engage in activities that interfere with your loyalty to the Company or your ability to perform Company duties or responsibilities effectively;
- you, or a member of your family, have a financial interest in a customer, supplier, or competitor which is significant enough to cause divided loyalty with the Company or the appearance of divided loyalty (the significance of a financial interest depends on many factors, such as size of investment in relation to your income, net worth and/or financial needs, your potential to influence decisions that could impact your interests, and the nature of the business or level of competition between the Company and the supplier, customer or competitor);
- you, or a member of your family, acquire an interest in property (such as real estate, patent or other intellectual property rights or securities) in which you have reason to know the Company has, or might have, a legitimate interest;
- you, or a member of your family, receive a loan or a guarantee of a loan from a customer, supplier or competitor (other than a loan from a financial institution made in the ordinary course of business and on an arm's-length basis);

- you divulge or use the Company's confidential information - such as financial data, customer information, or computer programs - for your own personal or business purposes;
- you make gifts or payments, or provide special favors, to customers, suppliers or competitors (or their immediate family members) with a value significant enough to cause the customer, supplier or competitor to make a purchase, or take or forego other action, which is beneficial to the Company and which the customer, supplier or competitor would not otherwise have taken; or
- you are given the right to buy stock in other companies or you receive cash or other payments in return for promoting the services of an advisor, such as an investment banker, to the Company.

Neither you, nor members of your immediate family, are permitted to solicit or accept valuable gifts, payments, special favors or other consideration from customers, suppliers or competitors.

Conflicts are not always clear-cut. If you become aware of a conflict described above or any other conflict, potential conflict, or have a question as to a potential conflict, you should consult with your manager, the area Vice President or Human Resources. If you become involved in a situation that gives rise to an actual conflict, you must inform your manager of the conflict.

6. Confidentiality

All employees are required to sign a written confidentiality agreement upon commencement of employment. Nothing in this policy is intended to alter or supersede the terms of this confidentiality agreement.

All confidential information concerning the Company and/or its employees obtained by you must be protected.

Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company, its employees, or its customers, if disclosed. You must maintain the confidentiality of such information entrusted to you by the Company, its employees, its customers and its suppliers, except when disclosure is authorized by the Company or required by law.

Examples of confidential information include, but are not limited to: the Company's trade secrets; business trends and projections; information about financial performance; new product or marketing plans; research and development ideas or information; manufacturing processes; information about potential acquisitions, divestitures and investments; stock splits, public or private securities offerings or changes in dividend policies or amounts; significant personnel changes; personnel information such as social security number and compensation information; and existing or potential major contracts, orders, suppliers, customers or finance sources or the loss thereof.

Your obligation with respect to confidential information extends beyond the workplace. In that respect, it applies to communications with your family members and continues to apply even after your employment or director relationship with the Company terminates.

7. Fair Dealing

Our goal is to conduct our business with integrity.

You should endeavor to deal honestly with the Company's customers, suppliers, competitors, and employees. Under federal and state laws, the Company is prohibited from engaging in unfair methods of competition, and unfair or deceptive acts and practices. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing.

Examples of prohibited conduct include, but are not limited to:

- bribery or payoffs to induce business or breaches of contracts by others;
- acquiring a competitor's trade secrets through bribery or theft;
- making false, deceptive or disparaging claims or comparisons about competitors or their products or services; or
- mislabeling products or services.

8. Protection and Proper Use of Company Assets

You should endeavor to protect the Company's assets and ensure their proper use.

Company assets, both tangible and intangible, are to be used only for legitimate business purposes of the Company and only by authorized employees or consultants. Intangible assets include intellectual property such as trade secrets, patents, trademarks and copyrights, business, marketing and service plans, engineering and manufacturing ideas, designs, databases, Company records, salary information, and any unpublished financial data and reports. Unauthorized alteration, destruction, use, disclosure or distribution of Company assets violates Company policy and this Code. Theft or waste of, or carelessness in the use of, these assets have a direct adverse impact on the Company's operations and profitability and will not be tolerated.

The Company provides computers, voice mail, electronic mail (e-mail), and Internet access to certain employees for the purpose of achieving the Company's business objectives. To ensure compliance with this policy, computer and e-mail usage may be monitored. As a result, the Company has the right to access, reprint, publish, or retain any information created, sent or contained in any of the Company's computers or e-mail systems of any Company machine. You may not use e-mail, the Internet or voice mail for any illegal purpose or in any manner that is contrary to the Company's policies or the standards embodied in this Code. Although employees have passwords that restrict access to their voice mail and computers, the Company may access any files, voice mail or e-mail messages stored on or deleted from a computer system or voice mail system.

You should not make copies of, or resell or transfer (externally or internally), copyrighted publications, including software, manuals, articles, books, and databases being used in the Company, that were created by another entity and licensed to the Company, unless you are authorized to do so under the applicable license agreement. In no event should you load or use, on any Company computer, any software, third party content or database without receiving the prior permission of the IT Manager to do so. You must refrain from transferring any data or information to any computer other than for Company use. You may use a handheld computing device or mobile phone in connection with your work for the Company, but must not use such device or phone to access, load or transfer content, software or data in violation of any applicable law or regulation or without the permission of the owner of such content, software or data. If you should have any question as to what is permitted in this regard, please consult with the IT Manager.

9. Reporting Violations of Company Policies and Receipt of Complaints Regarding Financial Reporting or Accounting Issues

You should report any violation or suspected violation of this Code to the appropriate Company personnel or via the Company's anonymous and confidential reporting procedures.

The Company's efforts to ensure observance of, and adherence to, the goals and policies outlined in this Code mandate that you promptly bring to the attention of your manager, area Vice President, Senior Officer or Human Resources, any material transaction, relationship, act, failure to act, occurrence or practice that you believe, in good faith, is inconsistent with, in violation, or reasonably could be expected to give rise to a violation, of this Code. You should report any suspected violations of the Company's financial reporting obligations or any complaints or concerns about questionable accounting or auditing practices in accordance with the procedures set forth below.

Here are some approaches to handling your reporting obligations:

- In the event you believe a violation of the Code, or a violation of applicable laws and/or governmental regulations has occurred or you have observed or become aware of conduct which appears to be contrary to the Code, immediately report the situation to your manager, area Vice President, Senior Officer or Human Resources. Supervisor or managers who receive any report of a suspected violation must report the matter to a Senior Officer.
- If you have or receive notice of a complaint or concern regarding the Company's financial disclosure, accounting practices, internal accounting controls, auditing, or questionable accounting or auditing matters, you must immediately advise your supervisor.
- If you wish to report any such matters whether anonymously or confidentially, then you may do so as follows:

Mail a description of the suspected violation or other complaint or concern to:
Human Resources, 46800 Bayside Parkway, Fremont, CA 94538.
or
hr@iselabs.com

10. Compliance Procedures

The Company has established this Code as part of its overall policies and procedures. To the extent that other Company policies and procedures conflict with this Code, you should follow this Code. The Code applies to all Company directors and Company employees, including all officers, in all locations.

The Code is based on the Company's core values, good business practices and applicable law. The existence of a Code, however, does not ensure that directors, officers and employees will comply with it or act in a legal and ethical manner. To achieve optimal legal and ethical behavior, the individuals subject to the Code must know and understand the Code as it applies to them and as it applies to others. You must champion the Code and assist others in knowing and understanding it. In general:

Use common sense and good judgment; act in good faith. You are expected to become familiar with and to understand the requirements of the Code. If you become aware of a suspected

violation, don't try to investigate it or resolve it on your own. Prompt disclosure to the appropriate parties is vital to ensuring a thorough and timely investigation and resolution. The circumstances should be reviewed by appropriate personnel as promptly as possible, and delay may affect the results of any investigation. A violation of the Code, or of applicable laws and/or governmental regulations, is a serious matter and could have legal implications. Allegations of such behavior are not taken lightly and should not be made to embarrass someone or put him or her in a false light. Reports of suspected violations should always be made in good faith.

Internal investigation. When an alleged violation of the Code, applicable laws and/or governmental regulations is reported, the Company will take appropriate action in accordance with the compliance procedures. You are expected to cooperate in internal investigations of alleged misconduct or violations of the Code or of applicable laws or regulations.

No fear of retaliation. It is Company policy that there be no intentional retaliation against any person who provides truthful information to a Company or law enforcement official concerning a possible violation of any law, regulation or Company policy, including this Code. Persons who retaliate may be subject to civil, criminal and administrative penalties, as well as disciplinary action, up to and including termination of employment. In cases in which you report a suspected violation in good faith and are not engaged in the questionable conduct, the Company will attempt to keep its discussions with you confidential to the extent reasonably possible. In the course of its investigation, the Company may find it necessary to share information with others on a "need to know" basis. No retaliation shall be taken against you for reporting alleged violations while acting in good faith.

11. Disciplinary Action

Any violation of applicable law or any deviation from the standards embodied in this Code will result in disciplinary action, up to and including termination of employment.

Any employee engaged in the exercise of substantial discretionary authority, including any Senior Officer, who is found to have engaged in a violation of law or unethical conduct in connection with the performance of his or her duties for the Company, shall be removed from his or her position and not assigned to any other position involving the exercise of substantial discretionary authority. In addition to imposing discipline upon employees involved in non-compliant conduct, the Company also will impose discipline, as appropriate, upon an employee's supervisor, if any, who directs or approves such employees' improper actions, or is aware of those actions but does not act appropriately to correct them, and upon other individuals who fail to report known non-compliant conduct. In addition to imposing its own discipline, the Company may bring any violations of law to the attention of appropriate law enforcement personnel.

12. Responsible Business Alliance (RBA) Code of Conduct Addendum

Our Code is designed to help comply with the law and maintain the highest standards of ethical conduct. The Code does not cover every issue that may arise, but it sets out basic principles and a methodology to help guide you in the attainment of this common goal including industry standards like Responsible Business Alliance (RBA) Code of Conduct.

A. Labor

The Company, its Suppliers and Vendors are expected to uphold the human rights of workers, with respect and dignity by following federal, state, local, and global laws.

1. The Company prohibit forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons.
2. There is no obligation to deposit identification cards/passport/work permit cards with employers, except for being required by law.
3. Employee is entitled to one day's rest therefrom in seven.
4. The Company will never knowingly use any suppliers who engage in child, forced or slave labor, nor will we condone such practices. We do not use workers under the age legally permitted.
5. Employee compensation shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, employees shall be compensated for overtime at pay rates greater than regular hourly rates.
6. The Company respects the privacy and confidentiality of personal information, this is any information that enables others to identify specific employees, directly or indirectly, by reference to an identifier such as a name, identification number, and may include sensitive personal information. We maintain only those employee records required for business, legal or contractual reasons, and limit access to those records to people who need the information for legitimate purposes.
7. Wage reduction due to disciplinary action is prohibited. Employee must be paid for all hours worked.
8. 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.
9. The Company is committed to providing a workplace free of harassment and unlawful discrimination that will be defined and communicated to employees under the Sexual and Other Unlawful Harassment policy.
10. The Company, Suppliers, and Vendors shall not engage in discrimination based on sex, gender, pregnancy, childbirth, or related medical conditions, as well as harassment based on such factors as race, color, religious creed, national origin, ancestry, age, physical disability, mental disability, medical condition, marital status, sexual orientation, gender identity, gender expression, genetic information, family care or medial leave status, military or veteran status, or any other basis protected by federal or state laws.
11. The Company will not tolerate harassment of any kind to an employee by a non-employee, nor to a non-employee by an employee in the workplace.
12. Periodic review of hiring practices, compensation records, employee evaluation and promotion documents, training records, employee benefits policies and procedures, and termination to ensure compliance are in effect. Please reference *Equal Employment Opportunity* policy for more information.
13. The Company recognizes that employees have the right to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively in accordance with local laws without interference, discrimination, retaliation, or harassment.
14. All work is voluntary and we are free to terminate employment at any time. Terminated employee will be paid appropriate amounts for all hours worked.

B. Health & Safety

The Company, its Suppliers, and Vendors are to ensure a safe work environment for our employees and others by complying with applicable laws and regulations relating to safety and health in the workplace.

1. The Company does not tolerate threats, threatening behavior, or acts of violence against employees, contractors, or visitors. Reference *Workplace Violence Prevention and Employee Conduct and Work Rules* policies for more information.
2. The Company prohibits the unlawful use, distribution, possession, or sale of alcohol, drugs or other controlled substances. Reference *Drug and Alcohol Use* policy for more information.
3. To ensure the safety of all our guests and visitors, they must sign in upon arrival.
4. Annual safety training of potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards. All required fire sprinklers/life safety systems will be maintained in accordance with local/state requirements by authorized vendor.
5. The Company complies with all safety rules and procedures when operating and maintaining machinery and equipment. Risk assessments will be documented annually for machine guarding.
6. Safety Personnel will assess as needed all processes that require PPE for specific job tasks and/or areas of the facility. This will be documented. All PPE will be requisitioned as needed.
7. All first aid cabinets are checked and inventoried by the Company's First Aid Kit vendor monthly. Safety Personnel inspects emergency support facilities on a monthly basis.
8. Reporting of job-related injuries to the Safety Personnel. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination of employment. Reference *Safety* policy for more information.
9. Violation of this policy must be reported to someone in Safety and Security or Human Resources at hr@iselabs.com.
10. All communications and training must be in a language understood by the worker.

C. Environment

The Company, its Suppliers, and Vendors are to commit to sustainable management of Environmental Health and Safety (EHS) Environmental Management Systems (EMS). The Company complies with applicable government standards and regulations while reducing our environmental footprint.

1. The Company performs periodic preliminary research and inventory to determine legal requirements that may apply to the facility. Identification of applicable legal requirements and coordination of internal and external experts may be used to identify the requirements. Auditing from internal or external resources to determine legal requirements are met.
2. The Company promotes recycling of materials to reduce the output of waste, minimize contamination, reduce land field space, and promote conservation of resources. Reference *Recycling Program* procedures for more information.
3. Reduction of energy consumption by using less energy. Following the *Energy Conservation Program* for more information.
4. Monitoring and measuring significant environmental aspects associated with operations and activities to evaluate the calibration and maintenance equipment for compliance. Reference *Procedure for Monitoring and Measurement* for more information.
5. Handling of Universal Hazardous Waste material by following Universal Hazardous Waste Procedures.

6. All hazardous waste/materials storage will be inspected on a weekly basis by Safety Personnel. All hazardous waste will be disposed of as needed/required.
7. The Company will utilize a calendar for keeping up to date on all permits, licenses, registrations, environmental reporting, and test reports.
8. Any hazardous chemical purchased must first be approved by Safety Personnel. The requisitioning software has a Safety Manager Approval box that must be approved before requisition can go through when buying a chemical. There is an annual review of all chemical inventory.
9. Janitorial staff will collect all recyclable and non-recyclable trash and dispose of it in its proper dumpster. Local trash vendor is responsible for all dumpster pickups. Proper handling of trash is reviewed during internal audits.

D. Ethics

The Company, its Suppliers, and Vendors are to uphold the highest standards of ethical manner.

1. Business integrity is expected in all businesses. All forms of corruption, extortion and embezzlement is prohibited.
2. The Company protects the privacy of business activities, structure, financial situations and performance by disclosing this information only for the purposes that it collected it for, and keep it only as long as it's needed for the purposes, or is legally required to use or disclose it for other purposes.
3. Record Retention of business records are in accordance with the law. Records must be adequately protected and maintained to ensure that records are no longer needed by the Company.
4. The Company complies with all applicable laws, rules and regulations of federal, state and local governments.
5. Business gift exchanges, entertainment or meals that of appropriate value is a customary business building relationship. However, you must avoid accepting gifts, entertainment, meals, or other business courtesies that could create conflict of interest. Comply with the laws and ethical standards by knowing the applicable requirements.
6. Bribery or other means of gaining undue or improper advantage are not to be offered or accepted.
7. Disciplinary actions may include immediate termination of employment or business relationship or any other necessary action based on the severity of the breach at the Company's sole discretion.
8. Proactively promote and be an example of ethical behavior in the work environment.

E. Management System

The Company, its Suppliers and Vendors will establish and implement a management system that will be in compliance with applicable laws, regulations and customer requirements related to the workplace.

1. The Company's commitment to be in compliance and continual improvement upheld by applying practices towards the *Integrated EQMS Manual and Policy Document*.
2. Identify the area of improvement, determine criteria and methods, ensure available resources, measure the continual improvement of the *Management Quality System*.
3. Once every two (2) years, review risk assessments and risk management in areas of environmental, health and safety, labor practice and ethic risks associated with the

- company's operations based on the conformance with the RBA Code requirements. Safety personnel will conduct RBA internal audits at ISE and record the results – the internal audit report can be reviewed during the MRM.
4. Once every two (2) years, Safety personnel will review the RBA code implementation for suppliers. Safety personnel is responsible for sending out the self-assessment material to the Suppliers. ISE validates and concludes the results. Any risk/actions are to be recorded.
 5. President of ISE Labs, Inc. is responsible for implementing the RBA continual improvement program.
 6. Responsible assignee(s) will ensure proper written documentation of implementation of the management systems and programs. Establish periodic reviews to maintain proper requirements.
 7. Objectives for the areas of improvement shall include targets, implementation plans, and training programs. Guideline for communicating and training programs should meet applicable legal and regulatory requirements.
 8. Documentation and records of corrective action processes are necessary to identify assessments, inspections, investigations and reviews.
 9. Annual and periodic reviews of self-audits to maintain continual improvements to be in compliance with Integrated EQMS Manual and Policy and Responsible Business Alliance (RBA) Code.