

Code of Conduct

Edition: Effective from 1st January 2020¹

1. Introduction

BR!GHT is committed to run a healthy, long-term and sustainable business in which responsibility for humans, society and environment is central. Our vision is a world where people see new possibilities, and to reach our objectives we depend on trust and credibility through high ethical standards. Our core values, responsibility, innovation, passion and collaboration are our fundamental beliefs and embody our company's story and culture.

BR!GHT is committed to contribute to sustainable development through high-quality renewable energy products and responsible business practices. By replacing kerosene lamps and other polluting technologies we will improve living standards and contribute to prosperity. Our efforts related to sustainability and ethics are deeply embedded in our values and business practices and reflected in our strategies and actions.

The Code of Conduct sets the basis for BR!GHT's work with sustainability and ethics throughout our value chain. It provides a clear set of values and principles to be upheld and safeguarded by the company and to be used systematically in strategic processes.

The Code of Conduct applies to BR!GHT's² employees and members of the Board of Directors. BR!GHT requires all its Business Partners³ to abide by similar principles to those outlined in this Code of Conduct in their own operations and to require the same from its own set of Business Partners.

The Code of Conduct is revised and approved by BR!GHT's Board of Directors every second year and it is published on BR!GHT's website. It is the responsibility of employees, members of the Board of Directors and Business Partners to ensure familiarity with the contents of the Code of Conduct, including any changes from previous versions. The published electronic version will always represent the most recent edition.

BR!GHT is committed to complying with all applicable laws, rules, and regulations in the countries where we operate.

BR!GHT will not tolerate any breaches of the Code of Conduct, BR!GHT's policies and procedures, or laws and regulations. Potential misconduct may be investigated. Any such violations will likely result in disciplinary actions, up to and including termination of employment, reporting to relevant authorities, and/or any other suitable actions.

2. Our principles

People

We respect all persons equally and do not accept discrimination related to nationality, race, gender, age, religious beliefs, sexual orientation, political affiliation, disability or any other form. BR!GHT is committed to promoting a diverse, inclusive and productive working environment. All shall be respected, given equal opportunities and have stable and predictable working conditions. We focus strongly on health and safety, and work to give our employees

¹ Replaces previous versions of BR!GHT's Code of Conduct, Suppliers and Partners Code of Conduct and the Anti-Corruption and Anti-Bribery Policy.

² «BR!GHT» is defined as Bright Products AS and its subsidiaries.

³ Business Partners are anyone with whom we do business, which includes, but is not limited to, suppliers, customers, distributors, agents, intermediaries, resellers, consultants, contractors, interns, associates and strategic partners.

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the opportunity to develop and grow in their positions. BR!GHT will not tolerate any form of harassment, included but not limited to bullying, sexual harassment and abuse of power. We will not tolerate any form of violence from stakeholders in our value chain.

Employees, the Board of Directors and BR!GHT's Business Partners are expected to act in a professional and responsible manner. We will not tolerate anyone being under the influence of drugs or alcohol during working hours, while on BR!GHT's premises, while conducting business on BR!GHT's behalf, at any social event sponsored by BR!GHT or at any other occasion while representing BR!GHT. Limited amounts of alcohol may, however, be consumed when local custom and the occasion make it appropriate but under no circumstances may this be combined with driving or operating machinery.

Human rights

BR!GHT is committed to respecting internationally recognized human rights throughout our own operations, as well as in our value chain. We will conduct our business consistently with the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the ten principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the core conventions of the International Labour Organization (ILO).

We oppose all forms of slavery, human trafficking, forced labour and illicit forms of child labour in our operations or value chain. BR!GHT recognizes and respects the right to freedom of association and the right to collective bargaining, if desired by the employee, within national laws and regulations.

Environment

BR!GHT, as a company, and the products we offer shall strive for the lowest possible negative impact on the environment. Our business shall actively seek environmentally-sound practices and work to reduce both direct and indirect damage to the environment. Furthermore, BR!GHT will pursue activities that will positively impact and, where possible, enable and encourage others to do the same. We will ensure that the company always complies with rules and regulations of relevance, and with norms and standards for environmental issues. We will work to constantly reduce the company's environmental footprint through sound practices on water and energy consumption, use of paper, waste management and low-carbon travel guidelines. Environmental performance and attitude will consistently be the basis for our design philosophy, and a key criterion when selecting our Business Partners. Our products shall be in the lead when it comes to reducing climate gas emissions and careful use of natural resources.

Business Partners

BR!GHT expects its Business Partners to comply with applicable laws, respect and conduct their business in line with internationally recognized standards and adhere to ethical standards which are consistent with our ethical requirements when working for or together with us.

BR!GHT will facilitate and encourage Business Partners to integrate ethical and sustainable practices in their work. We will listen to and cooperate with Business Partners, interest groups and authorities to gain insight to concerns and receive proposals for improvements. Sustainability will be a key factor throughout our value chain, and thereby a key factor in our interaction with Business Partners. BR!GHT will strive to be a forerunner in the pursuit of sustainable and ethical business, and we will abide by the same standards that we expect from our Business Partners. We will continuously strive to map and monitor our supply chain and support any member of it to improve their compliance with our principles.

BR!GHT expects immediate notification from Business Partners of any suspicion or concern of breaches, or any other non-compliance with the standards in this Code of Conduct. This applies to BR!GHT's Business Partners and

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their sub-contractors. Failure to comply with any of the principles or standards set out in this Code of Conduct, and which are directly related to the expectations BR!GHT has of its Business Partners, may result in discontinuance of business relationships with immediate termination rights.

Consumers

Our products shall not harm or cause any danger to our consumers. We have rules of caution in our strategies for product development and marketing. We will treat vulnerable groups with extra care and attention, while seeking to meet the needs and provide access to our products also for marginalized target groups. Our customers shall have access to service and support if they have any concerns.

Stakeholder engagement

BR!GHT wishes to be an active and positive contributor to society. We aim to involve our consumers and Business Partners in collaborative activities where they can have a say in future product development and acquire new knowledge through the collaboration. We seek business models where parts of the value creation contribute to the support of local entrepreneurship, and where the value creation for end users and communities goes beyond the utility of the product and the services they purchase.

Anti-Corruption

BR!GHT has zero tolerance for any form of corruption, including bribery, facilitation payments and transfer mispricing. Corruption is defined by Transparency International as *the abuse of entrusted power for private gain*. According to Norwegian law corruption is *to request or receive, give or offer an improper advantage in connection with a position, office or assignment*. We will actively work to prevent, avoid and detect any form of corruption as well as to ensure that no criminal or wrongful actions take place within the company or our value chain. The Norwegian anti-corruption law applies to all companies and individuals who act on BR!GHT's behalf.

Fair competition

BR!GHT and its Business Partners shall comply with all applicable competition laws and regulations and will never take part in any anti-competitive activities, such as fixed prices, collusive tenders, market sharing and output restrictions.

Conflicts of interest

Conflicts of interest arise when one's personal interests interfere or appear to interfere with BR!GHT's interests. BR!GHT expects its employees, Board of Directors and Business Partners to immediately disclose and address situations where there is an actual, potential or perceived conflict of interest. Openness and transparency are crucial in dealing with these situations.

Financial accountability

BR!GHT's records shall be prepared in accordance with applicable laws, regulations, relevant accounting standards and BR!GHT's internal policies. We are committed to transparency and accuracy, and we will provide full, fair, accurate and understandable disclosures in our financial reports. Inaccurate or unsubstantiated records may be treated as fraud.

Money laundering

Money laundering supports criminal activity. It is illegal in Norway and in most other countries. BR!GHT and its Business Partners will not allow money laundering and will comply with all applicable anti-money laundering laws.

Gifts and hospitality

At BR!GHT, we prefer not to give or receive gifts, except for promotional items of minimal value. Hospitality, gifts,

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and expenses that could affect or be perceived to affect the outcome of business transactions or which could be regarded as illegal, unethical or improper are prohibited. If any gifts or services are received and accepted, these will be considered given to BR!GHT, as a company, and not to any individual employees.

Confidential information

BR!GHT is dedicated to protecting confidential, sensitive and personal information. Business Partners are also expected to comply with all applicable laws and regulations governing the protection, use and disclosure of BR!GHT proprietary, confidential, and personal information.

Corporate governance

BR!GHT shall have a transparent governing structure, where our responsible approach to business is present in all our strategies and actions. We are a company with high integrity, and welcome inquiries and/or proposals regarding the company and its operations.

Lobbying

BR!GHT will not be part of interest groups or activities that pursue self-interest at the expense of individuals, societies, or the environment. We will not attempt to influence market dynamics in favour of the business, when doing so compromises the societal progress of our external environment. BR!GHT may be member of interest groups or other organizations whose values align with those of the company. In such cases, BR!GHT is committed to transparency, and will disclose the date, size, and recipients' name of all financial contributions related to lobbying activities on its website.

3. Implementation

Commitment

BR!GHT will actively safeguard, work to promote and improve upon the above-mentioned set of values and principles throughout our organization and in our relations to our Business Partners and the people affected by our operations. We will commit resources, as allocated by the Board of Directors, specifically to the pursuit of increasingly sustainable and ethical operations.

Monitoring

BR!GHT will commit to always have systems and tools in place with which we can assess our progress toward becoming a truly sustainable and ethical business. BR!GHT will, with the aid of suitable third parties, continuously monitor and evaluate the degree to which we meet and, hopefully, exceed our principles and standards. We will identify potential improvements and take corrective actions wherever needed. We will encourage and provide guidance to other companies in our value chain to do the same. Business Partners shall allow and facilitate assessments, upon the request of BR!GHT or third parties acting on its behalf, to ensure that the principles and standards set out in the Code of Conduct are upheld.

Reporting an issue

All have an obligation to report violations or possible violations of the Code of Conduct, BR!GHT's policies and procedures, as well as laws and regulations. BR!GHT has an obligation to investigate all reports made. The first point of contact for reporting should usually be your line manager. Other points of contact can be any senior manager, the CEO or the Chairman of the Board. You may choose to remain anonymous where allowed by law. BR!GHT will not tolerate retaliation against anyone who has reported an actual or suspected violation in good faith.