

SUPPLIER CODE OF CONDUCT

Purpose and Expectations

The Omega Optical Holdings, LLC (“Omega Optical”) Code of Conduct reflects our commitment to doing business with integrity. At Omega Optical, integrity means our conduct is true to our words; we adhere to the letter and spirit of all applicable laws, regulations and policies. We pride ourselves in doing business ethically, avoiding even the appearance of impropriety. We expect that our business partners will share our ethical principles and adhere to this Supplier Code of Conduct (“Code”).

This Code has been developed to incorporate the principles of Omega Optical’s Code of Conduct as well as international norms on human rights and the protection of the environment. The Code outlines the expectations that we have regarding the operations of our Suppliers, and addresses the principles found in the United Nations Global Compact, of which Omega Optical is in support.

Omega Optical defines “Suppliers” as any organization or entity that directly provides goods and/or services to Omega Optical. The Code is meant to act as a reference during our selection and retention of all Suppliers that provide goods or services supporting our operations worldwide. While Omega Optical understands and respects that there are different legal and cultural environments in which our Suppliers conduct their operations, this Code will provide our Procurement Organization with a foundation to assist in contracting decisions and Supplier selection, and a framework by which to hold our Suppliers accountable to Guiding Principles and international norms. To create a responsible and effective supply chain, Omega Optical will seek business partners who share the same commitment to human rights and our Guiding Principles.

Omega Optical is dedicated to the continuous improvement of this Code. The Code will be modified and/or updated accordingly following any significant change in law or regulation impacting our operations, or in such cases where Omega Optical believes it is necessary.

Legal Compliance

Suppliers are expected to comply with all applicable legislation, including laws, regulations and legal requirements on human rights, labor, the environment, anti-corruption, and trade and customs. The Code also references international norms, such as the International Labor Organization (ILO) Conventions. Omega Optical expects the Supplier to comply with country-specific or local legislation, the international norms explicitly referenced in the Code, or Omega Optical’s-specific standards, whichever standard is higher. Should conflicts arise between local legislation and international norms or Omega Optical- specific standards, the Supplier is expected to notify Omega Optical.

Environmental, Health, Safety & Product Stewardship

The operations of our Suppliers are expected to comply with all applicable environmental, health and safety laws, regulations and legal requirements in the countries in which they operate.

Suppliers are expected to provide:

- Their employees with a safe, clean, and healthy work environment and living environment, if Suppliers provide employees with accommodation
- Their employees with adequate training related to health, safety, product stewardship and the environment
- Adequate management systems for environmental, health and safety, and product stewardship programs
- Products that are safe and environmentally sound to use and dispose of
- Products that perform as claimed
- Useful information on the performance and safe use of their products and
- Programs to reduce the environmental impact of their products, such as:
 - Optimization of energy consumption with a view to reducing greenhouse gas emissions
 - Optimization of consumption of natural resources
 - Reduction of quantities of waste released and development of reclamation and recycling solutions, and
 - Reduction of discharges into natural surroundings and other sources of pollution.

Suppliers are expected to establish goals and monitor the reduction of their environmental footprint.

In procuring raw materials, suppliers are expected to verify that all materials used in the manufacture of Omega Optical products or sale of products to Omega Optical were sourced in compliance with all applicable environmental laws, regulations and legal requirements.

To ensure safe handling, movement, storage, recycling, reuse, and disposal, Suppliers are expected to identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal.

Raw Materials Procurement – Conflict Minerals

Omega Optical does not tolerate the use of raw materials that directly or indirectly contribute to armed conflict or human rights abuses in any of its products.

At a minimum, the supplier is expected to:

- Have a policy that addresses the responsible procurement of conflict minerals (currently defined in section 1502(e)(4) of the Dodd Frank Wall Street Reform Act)
- Train appropriate personnel on this policy
- Implement a risk assessment (supply chain mapping) of all conflict minerals sources, and

- Develop an appropriate risk mitigation strategy for those suppliers identified as “high-risk” in the supply chain mapping exercise.

Omega Optical encourages the supplier to verify the supply chain due diligence practices of their suppliers regarding conflict minerals and to join or build partnerships with industry organizations implementing due diligence in the mineral supply chain.

Employment Standards

Suppliers are expected to hire, compensate, provide benefits and access to training, promote, terminate and/or retire employees without regard to race, color, religion, national origin, political affiliation, union membership, marital status, pregnancy, age, disability, gender, gender identity, sexual orientation, or any other characteristic unrelated to the ability to do a job.

Suppliers are expected to provide their employees with compensation benefits and working hour schedules in compliance with all applicable laws and collective agreements.

Suppliers are expected not to employ child labor. Omega Optical will not knowingly engage a Supplier that directly or indirectly through a third party employs child labor on the Supplier’s premises. We define “child labor” as work or service extracted from anyone under the age of sixteen (16), the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. Omega Optical supports the participation in legitimate workplace apprenticeship programs, so long as they comply with all applicable laws and are consistent with Articles 6 and 7 of the ILO Minimum Age Convention No. 138 on vocational or technical education and light work. If children below the legal working age are found in the workplace, suppliers are expected to take measures to remove them from work and to help seek viable alternatives and access to adequate services and education for the children and their families.

Suppliers are expected to comply with all legal requirements for the work of authorized young workers (workers under the age of eighteen (18)), particularly work that is likely to jeopardize the health or safety of those young workers. It is expected that specific attention will be paid to requirements pertaining to hours of work, wages, working conditions, and the handling of certain materials.

Suppliers are expected not to employ forced, slave, convict or bonded labor. Omega Optical will not knowingly engage a Supplier that directly or indirectly through a third party employs forced, slave, convict or bonded labor on the Supplier’s premises. In accordance with Article 2 of the ILO Forced Labor Convention No. 29, Omega Optical defines “forced labor” as any work or service not voluntarily performed and extracted from an individual under the menace of penalty and/or subject to unduly burdensome conditions such as, but not limited to, the surrender of government-issued identification, passports, or work permits, or any other limitations inhibiting the employees free will with respect to work. Omega Optical defines “convict” labor as any labor performed by a legally convicted person on or outside of prison grounds. The definitions of slave and bonded labor as defined by Omega Optical are reflected

in the Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery under Articles 1 and 7.

Suppliers are expected to not employ persons who were trafficked into employment on the Supplier's premises or engage in human trafficking, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.

While Suppliers may favor or encourage a self-represented work force, Suppliers are expected to:

- Allow employees the freedom to join labor organizations or to not join such organizations, and the freedom to bargain collectively as determined by the employees themselves without coercion, interference, retaliation or harassment, in compliance with all applicable laws, and
- Allow alternative means of worker representation, organization, ability to address grievances and resolve disputes, if freedom of association and collective bargaining is lawfully restricted.

Employees of Suppliers are expected to work in an environment free from harassment and abuse, including, but not limited to, sexual and physical harassment and psychological, verbal and physical abuse.

If disciplinary procedures are practiced by Suppliers, the procedures are expected to be

- In compliance with all applicable legislation
- Applied in a standardized fashion, and
- Documented in a policy on which all members of management are trained and of which all employees are informed upon hire.

Grievance Mechanisms

Suppliers are expected to introduce an adequate system to address employee grievances and resolve disputes that:

- Protects the employee's privacy and allows for anonymous reporting of grievances
- Protects the employee against retaliation
- All members of management are trained on, and
- Is communicated to all employees.

Conflicts of Interest, Gifts and Entertainment

Omega Optical is committed to ethical business practices. Conflicts of interest - in practice or in appearance - run counter to fair treatment and good procurement policies. Our Suppliers are expected to know that Omega Optical employees are directed to avoid any relationship, influence, or activity that might impair, or appear to impair, Omega Optical's ability to make objective business decisions. Omega Optical employees are expected to identify situations

that could bias, or appear to bias, buying decisions. Omega Optical employees who buy goods or services directly, or are otherwise involved in the procurement process, shall refrain from the following:

- The solicitation of any gift, excessive entertainment, or favor of any significant value.
 - Excessive entertainment to include that which: requires travel; has cash value greater than \$500; occurs frequently; is provided for the exclusive benefit of the employee without Supplier participation; is provided where no business is conducted; includes family members or guests of the employee (outside of spouse or significant other) at the expense of the Supplier.
- The receipt of a product or service constituting more than a modest social amenity or normal supplier sales promotion which may appear to be capable of influencing the employee's decision.

Omega Optical employees may accept unsolicited meals, refreshments, or entertainment of reasonable value on an infrequent basis in connection with normal business discussions.

Suppliers are expected to respect the limitations placed on Omega Optical employees, as stated above, and refrain from putting them in an uncomfortable situation by offering them gifts or other favors that they may not accept.

Anti-Corruption

Suppliers to Omega Optical are expected to fully comply with all Anti-Corruption laws, including but not limited to the United States Foreign Corrupt Practices Act of 1977 (FCPA), the UK Bribery Act, and the OECD Convention on Combating Bribery.

We expect that our suppliers will not directly or indirectly offer, pay, promise to pay, or authorize the payment of any money, or offer, give, promise to give, or authorize the payment of any money, or anything else of value to any person, including any official or employee of any government, or any person acting in an official capacity for or on behalf of any such government for the purpose of

- Influencing or rewarding any act or decision of such person, official, employee, party or candidate, or
- Inducing such person, official, employee, party or candidate to do or omit to do any act in violation of his or her lawful duty, or
- Inducing such official, employee, party or candidate to use its or his influence with a foreign government or instrumentality thereof to affect or influence any act or decision of such government or instrumentality, or
- Securing any improper advantage for the Supplier.

Similarly, Omega Optical prohibits the use of facilitating (or facilitation) payments and we expect our suppliers to never make such payments on Omega Optical's behalf.

Antitrust & Competition Laws

Suppliers are expected to be in compliance with both the letter and the spirit of all antitrust/competition and trade practice laws. These laws include federal and state antitrust and trade practice laws in the United States as well as the legal provisions applicable to competition and trade practices in each of the other countries where the Supplier operates.

Trade and Import Restrictions

Suppliers are expected to comply fully with all applicable United States trade laws and customs regulations as well as those laws applicable in the countries where they do business. Applicable United States trade laws and customs regulations include such matters as: country of origin labeling, U.S. embargoes, sanctions, export controls, and restrictions on doing business with “specially designated nationals” and “blocked persons”. The U.S. government maintains and updates almost daily lists of such “specially designated nationals” and “blocked persons” with whom business dealings may be prohibited or severely restricted under U.S. law. A copy of this list is available at <http://www.treas.gov/offices/enforcement/ofac/sdn/>.

Suppliers taking part in any international transactions are also expected to become C-TPAT certified, maintain an equivalent supply chain certification through their government or local customs authorities, or verify they meet the minimum security standards which can be found at www.cbp.gov.

Subcontracting

Suppliers are expected to hold their subcontractors and suppliers accountable to principles in line with this Code.

Communication

Suppliers are expected to adequately communicate the elements of this Code or a comparable Business Conduct Policy to its leadership, its employees and its subcontractors and suppliers.

Monitoring and Compliance

Omega Optical maintains the right to take actions, including inspections of the Supplier’s facilities and worker accommodations and review of any applicable documentation to ensure our Code has been implemented and is being followed by our Suppliers. Suppliers are expected to keep accurate records to prove compliance with the Code. It is the expectation of Omega Optical that our Suppliers will take corrective actions within a time frame jointly agreed upon by the Supplier and Omega Optical to remedy any identified noncompliance.

Contact Information

Should you have any questions or require a hardcopy version of this Code, please refer <http://omega-optical.com> or write to this email address: sales@omega-optical.com.