

Doing Business with Glass Instruments

CODE OF CONDUCT

Glass Instruments is committed to conducting all of its business activities in accordance with the highest legal and ethical standards.

Glass Instruments policy is to purchase products and services based on total value to the Company independent of a supplier's decision to purchase from Glassinstruments. Factors that Glassinstruments considers in making purchasing decisions include competitive pricing, quality of work and materials and timely performance.

Glass Instruments will not knowingly purchase goods or services produced using child or forced labor. Glassinstruments does not want to conduct business on any other basis.

It is Glass Instruments policy to comply with all provisions of the antitrust, competition and trade regulations laws of the The Netherlands and corresponding laws of other nations.

Glass Instruments will not offer, authorize or make any illegal payments or provide anything of value, directly or indirectly, to a foreign political party or candidate of political office to use his/her influence to obtain or retain business for the Company.

It is against Glass Instruments policy for any Glass Instruments employee to ask any of Glass Instruments its customers, distributors, suppliers or vendors to provide any type of gratuities. Glass Instruments realizes at times it fosters better business relationships when token gifts are exchanged. Glass Instruments employees are prohibited from accepting or receiving gifts or other gratuities except within the following guidelines:

- They are consistent with acceptable business customs and practices.
- They have a business purpose.
- They are not illegal or in violation of the ethical guidelines of the other company.
- They are of nominal value and would be paid by normal Company expense account procedures.
- They are not solicited by the recipient.
- They cannot be construed as a bribe, payoff or kickback.
- They are not given or received on a frequent basis.
- They will not cause, and would not reasonably be perceived to cause, the recipient to alter normal business judgment concerning any transaction with the Company or impair the individual's loyalty to their employer.
- They would not be an embarrassment to the Company or the employee if publicly disclosed.

What can you do?

Though the vast majority of Glass Instruments employees and our contractors, customers, distributors, and suppliers embrace our ethical standards, there may be a few isolated individuals who attempt to violate our Code of Business Conduct.

Since we aren't always in a position to recognize those people, we need your help to do so. If you feel someone at Glass Instruments is doing something unethical, illegal or otherwise violates Glass Instruments Code of Business Conduct, we ask that you contact the CEO of Glass Instruments personally. You may do this by calling 0031 6 36021264 or send an email to arjan@glassinstruments.nl

What types of situations should I report?

Your report may stop an already bad situation from becoming potentially much worse. Examples of these situations may involve any of the following:

- Anti-Boycott Laws
- Antitrust Laws
- Conflicts of Interest
- Export / Import Laws
- Fraud
- Improper Accounting / Internal Accounting Controls / Auditing Matters
- Improper Lobbying and political Contributions
- Payments to Members of Government
- Theft, Bribes, Kickbacks and Corruption

Contact the CEO of Glass Instruments even if you don't have all of the facts. We will look into the information you can provide, attempt to verify it and then take appropriate action.