



Payton Planar's Ethical Code and Code of Conduct

This **Ethical Code and Code of Conduct (Code)** defines the basic requirements imposed on PAYTON Company and its Employees concerning the responsibilities of the company, its employees, customers, suppliers and the environment.

PAYTON reserves the right to reasonably amend the requirements of this **Code** due to changes in the future.

Payton Planar Company and all its Employees (incl. temporary) are compliant to the following:

- Legal compliance, Prohibition of corruption and bribery

- Comply with the laws of the applicable government legal system(s).
- Tolerate no form of and not to be engaged in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official or individual inside or outside the company for the purpose of influencing decision makers in violation of the law.
- Tolerate no form of and not to engage in any form of illegal financial transactions, any form of extortion, money laundering, illegal diamond or drug trafficking or else.
- Not to forge any financial or technical data and preserve full integrity and transparency when presenting company performances.
- Not act in way that can be interpreted as conflict of interest; The company workers will not trade in company equities and not use any insight knowledge for personal advantage.

- Respect for basic human rights of employees

- The company, its Management and all the Employees strive to promote equal opportunities for and fair treatment of its employees, irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
- Respect the personal dignity, privacy and rights of each individual; All the personal information provided to the company is discrete and will be preserved as such.
- Refuse to tolerate any unacceptable or unfair treatment of employees, such as mental cruelty, sexual harassment or discrimination;
- Prohibit behavior including gestures, language and physical contact that is sexual, coercive, threatening, abusive or exploitative;
- Provide fair remuneration and guarantee the applicable national statutory minimum wage and occupational conditions;
- Comply with the maximum number of working hours laid down in the applicable laws;
- Recognize, as far as legally possible, the right of free association and to neither favor nor discriminate against members of employee organizations or trade unions.

- Prohibition of child labor and forced labor

- The company will not employ workers under the age 15 or, in those countries subject to developing country exception of the ILO Convention 138, to employ no workers under the age of 14.
- Refuse to employ or make anyone work against his or her will;



- Health and Safety of employees

- The company, its management and all the employees recognize the Responsibility for the health and safety of all employees;
- Control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
- Provide training and ensure that employees are educated in health and safety issues;
- Set up or use an occupational health & safety management system.

- Environmental protection

- The company, its management and all the employees commit to act in accordance with the applicable statutory and environmental standards regarding Environmental protection;
- Minimize environmental pollution and make continuous improvements in environmental protection.
- Set up or use an environmental management system according to ISO 14001.

- Supply Chain

- The company applies best efforts to promote compliance with this Code among its suppliers.
- Comply with the principles of non-discrimination with regard to supplier selection and treatment.

- Confidentiality

- The Employees commit to keep properly confidential information about the company, its products and all sensitive business-related subjects and not to spread it uncontrollably (e.g. social media) unless authorized.
- The Employees commit to keep properly discrete information about their colleagues and will respect personal confidential information.
- The Employees will be alert about cyber security restrictions and will strive to act responsibly when using hardware, software and databases provided by the company.

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