



## Code of Conduct

### Compliance with NVD's Code of Conduct

The New Vision Display ("NVD") Code of Conduct ("Code") sets forth the Company's standard business practice. This Code applies to NVD and its subsidiaries, and all directors, officers and employees (including contractors, consultants or temporary workers) of each. All references to "employees" include directors, officers, and employees of NVD and its subsidiaries

NVD and its employees will not discriminate on the basis of race, gender, sexual orientation, or age, and will be sensitive to cultural differences in the regions in which NVD operates, adopting best practices available internationally.

**All employees are accountable and responsible for understanding and complying with this Code, applicable laws, regulations and NVD policies that are related to their jobs. In fulfilling these responsibilities, each employee must:**

- Read, understand and comply with this Code and all NVD policies that are related to his/her job.
- Participate in training and educational programs/events required by his/her job.
- Make a commitment to conduct NVD business with integrity and in compliance with applicable laws and regulatory requirements.
- Report possible violations of this Code, policies, applicable laws and regulatory requirements
- Obtain guidance for resolving a business practice or compliance concern if he/she is uncertain about how to proceed in a situation.
- Deal honestly with colleagues, customers and suppliers.
- Provide full details of all relationships that may, in the course of a transaction be construed as creating a conflict of interest or appearance of a conflict of interest. A "conflict of interest" exists when an individual's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of NVD.
- Proactively provide all information to superiors that may have a material influence on matters under consideration.

- Support and maintain systems of internal control, and not seek to override such internal controls by acts of omission or commission.
- Protect the interests of shareholders.
- Provide full, fair, accurate, timely and understandable information in all internal reports and documents filed with the Securities and Exchange Commission or any other government agency, or releases to the public.
- Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts.
- Protect and respect the confidentiality of information acquired in the course of his/her work except when authorized or otherwise legally obligated to disclose, and not use confidential information for personal advantage.
- Achieve responsible use of, and control over, all assets and resources employed by or entrusted to him/her.

**NVD will:**

- Deal fairly with all current, prospective and departing employees.
- Participate and support the communities in which it does business.
- Protect the environment to the best of its ability.
- Encourage and promote best practices.
- Seek to raise standards both internally and externally rather than accepting the status quo.
- Communicate effectively with employees and provide communication lines such that all issues may be raised.

**Quality**

NVD will establish and maintain systems in accordance with our established and generally accepted best practices

NVD will keep complete and accurate records.

NVD will faithfully record and report all findings irrespective of cause, responsibility or consequence.

**Finance**

NVD will take all steps necessary to record and preserve the Company's assets.

NVD will maintain systems to accurately record and present the Company's operations, openly disclosing value judgments and estimates incorporated in presentations and using generally accepted accounting principles and policies. The Company's principal executive officer and the principal financial officer will review

the annual and quarterly reports, certifying the accuracy of the information, prior to filing with the Securities and Exchange Commission.

### **Working with the Government**

All NVD employees will:

- Deal honestly and accurately with government officials and agencies.
- Comply with applicable laws and regulations relating to working with government officials and agencies, particularly special requirements associated with government contracts and transactions.

Not make any substitutions nor deviate from contract requirements without the written approval of the authorized government official.

### **Anti-Corruption**

NVD prohibits participation in bribes or kickbacks of any kind, whether in dealing with public officials or individuals in the private sector.

NVD is committed to abiding with the standards of conduct set forth in the U.S. Foreign Corrupt Practices Act and the anti-corruption and anti-money laundering laws of the countries in which NVD operates.

### **Reporting of Breaches or Suspected Breaches**

It is the responsibility of every employee to promptly report any fraud or breach or suspected breach of this Code.

Unless the suspected breach is by an employee's immediate supervisor/manager, the normal channel of reporting is through the employee's supervisor/manager with a copy to the HR Director. In the case of suspected breach by the reporting employee's supervisor/manager, the reporting channel is to the Company's Chief Financial Officer, with a copy to the Company's Chief Executive Officer and to the HR Director. In the case of suspected breach by a member of the Executive Committee of the Company (e.g., CEO, CFO, COO) the procedure is to report to another member of the Executive Committee with a copy to the HR Director.

NVD expects all employees to cooperate in internal investigations of misconduct and violations of this Code.

Employees should be aware that NVD has a statutory duty to protect any employee who reports his or her concerns in good faith, and to ensure that there is no retaliation. Reports will be treated in a confidential manner.

## **Waivers of the Code**

Only the Board of Directors may waive a provision of this Code. Any such waiver of this Code will be promptly disclosed as required by law or regulation. Requests for waivers must be made in writing to NVD's Chairman of the Board prior to the occurrence of the violation of this Code.

## **Breaches**

This Code sets forth the minimum standard of behavior NVD expects of its employees. The Company may take any breach of this Code by an employee into account when assessing performance pay, discretionary bonuses, merit raises, and/or renewal of fixed term contracts. In material cases, NVD may deem a breach of this Code a breach of your employment contract or the terms of your employment, and consider such breach cause for termination. Such violator may also be subject to civil action and/or referral to law enforcement agencies for criminal prosecution.