



CODE OF CONDUCTS



A commitment to Social Responsibility for a sustainable Company.

The Tech Design Group, its shareholders, management and all of the teams and departments at Tech Design are committed to Corporate Social Responsibility.

This commitment is central to our corporate strategy and demonstrates our willingness to help work towards more sustainable development.

The group takes an active position in advancing the organization to become more aware of our activities' social, ethical and environmental impact, and is actively contributing to improving both society and the environment.

This commitment is part of a long-term initiative, an effort to improve our organization's overall performance.

*These efforts cover good governance, social and environmental responsibility, customer satisfaction, supply chain optimization and risk management. Our Sourcing Bureau got the Certification **SA 8000 and ISO 9001 in July 2020***

This also enables us to ensure that our organization will thrive in the future, thanks to our commitment to our code of ethics.

The Tech Design Code of Conducts is a key part of our CSR. It has been signed by all of our partners at the Tech Design group.



Our values

Making sense

From the very beginning, the corporate culture here at Tech Design has been built on a strong set of values.

Today, we must continue to share these values and make them permanent in a document which will bring us together and guide us.

This code of Conduct must guide our actions, help us make the right ethical decisions and give a platform to our core values.

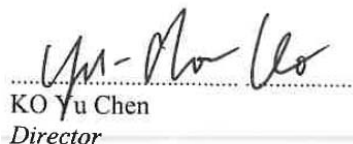
It is the duty of all of us to commit to this code of conduct. This represents our integrity and our ethics.

This commitment serves as a moral compass and increases our value, as a company and in the professional lives we share with our colleagues and partners.

Stephane MONNIER
Ceo

A stylized, handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke.

Ken KO
Director

A handwritten signature in black ink, featuring a cursive style with a prominent 'K' and 'O'.

KO Yu Chen
Director



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The founding principles

Our products must meet very strict standards for quality.

We build strong, long-lasting relationships with our customers and our suppliers, founded on confidence and mutual interest.

We obey all laws in the countries in which we do business.

We maintain high standards for accountancy and profit reporting, and fully support the fight against corruption.

We place great value on honesty and transparency.

We want TD group to be a workplace in which all of our team members can flourish and grow professionally.

They must have access to a pleasant working environment, where talent and personal merit are recognized, diversity is a strength, privacy is respected and the balance between private and professional life is respected by all.

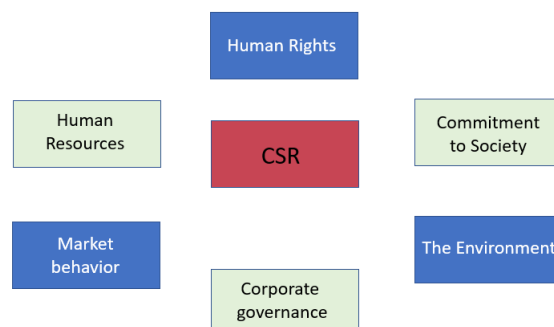
We believe that it is important to provide our teams with a good working environment and good career prospects, as well as the possibility of change. We encourage our team members to debate, to listen to and respect one another, and to feel free to express not only their skills and strengths to take responsibility and initiative, but also any worries or concerns they may have.

We are aware of the environmental impacts of our activities, and we are constantly seeking new ways to decrease them.

We respect cultural differences.

We are committed to respecting Human Rights. We wish to contribute to the abolition of forced and child labor.

We actively seek and favor partners who share our values and ethical commitments.



Applying the code

It's for everyone, with respect to the individual and the law.

We ask each of our team members to adhere to this code in their daily activities.

We want them to work together in harmony and respect.

With this in mind, we maintain throughout the company a culture based on loyalty, trust and solidarity.

We must recognize the ideas and contributions of others. Teamwork is encouraged, and both successes and failures must be shared. We must freely share information with each other, while respecting the Group's confidentiality regulations.

TD encourages dialog and any employee is free to express any legitimate concern, point of view, defend their opinions and alert the management to any unacceptable behavior or request.

We will ensure that all concerns raised about any potential unacceptable behavior within the company, whether from a colleague or a business partner, be examined in detail, and the appropriate actions be taken.

Whether within the company or on an individual level, the golden rule is to obey Hong Kong laws and regulations, and those of any country in which Tech design Ltd does business.

TD emphasizes the special importance of this in the following fields:

- Human Rights: Absolutely no forced or child labor, full respect of anti-discrimination laws, and laws regulating working hours and salaries.
- Quality, health and safety standards and technical regulations.
- Customs and Legislation (nomenclature, declarations and taxation)
- The environment
- Competition
- Corruption
- Fiscal policy and confidentiality of information

TD hopes to share these principles with our business partners and to ensure as much as possible that they follow the same laws and regulations.



Compliance and Quality



Safety and quality are crucially important to both the customers and the users of the products which we manufacture.

The quality and compliance of our products are proof of our commitment.

We are committed to only manufacturing and importing products which have been rigorously tested by approved bodies and therefore proved their quality and compliance.

Each team member at TD must follow the product specifications from design to delivery.

Those of us involved in development, marketing, manufacture, import and sale of our products must:

- Obey all laws and regulations concerning product development, manufacture, packaging and labeling.
- Encourage free and open debate about questions relating to product non-compliance to ensure that none are overlooked.
- Ensure that the hygiene and quality regulatory and adapted standards are implemented throughout each step of the production process.
- Ensure that all comments and complaints from customers or consumers are passed on to the appropriate department.
- React to any potential safety and non-conformity problem with our products and quality checks.
- Make sure that audits are correctly and regularly carried out by independent and approved bodies.
- Make sure that production inspections and QC are carried out by approved independent bodies.



Documents and information

It is up to all of us to ensure that all the information in our operational, financial and other documents is correct.

This is essential for the honest, efficient and legal functioning of our company. In particular, it is crucial to provide your superiors, our customers and the appropriate authorities with transparent, correct and reliable information.

Every one of us must:

- Help ensure that all information in our professional documents is correct.
- Safely store these documents following the correct archiving procedures.
- Co-operate with internal and external auditors.
- Respect the frequency and precise wording of all report documents.

Means and resources



The Company's assets are there to enable our team members to achieve the Tech Design Group's economic objectives. Misuse or waste of these resources, including employee time, damages us and the operational and financial performance of Tech Design .

Every one of us must:

- Completely avoid any personal use of Company resources.
Private use of communication tools such as e-mail, telephone, internet etc. may be tolerated if not used excessively, if it does not incur unreasonable costs and does not impinge on our professional activities.
- Conserve and protect Company resources, avoid that they are not lost, damaged, misused, wasted, loaned, transferred or sold without prior authorization.
- Avoid all inappropriate use of the ICT systems, e-mail, internet and even Facebook.
- Bear in mind that all Company assets and documents are the property of Tech Design



Confidentiality

Unauthorized release of confidential information can harm TD and our customers. Above all, we must ensure that all private information remain strictly confidential.

Those of us with access to confidential information relative to our business partners have a responsibility to protect them against release.

Every one of us must:

- Restrict the transfer of confidential information to those with a legitimate reason for access in the interests of the Company.
- Ensure the complete security of all confidential customer and supplier data, whether in printed or electronic format. ➤ Prevent all release of confidential information to anybody not within the Tech Design group (including members of employees' families).
- Avoid discussing or working on confidential information in public places where conversations may be overheard and the security of the data compromised.
- Not releasing confidential information about a previous employer.
- Returning any and all confidential information (including copies) in case of departure from the Tech Design Group.

Representing the company

The reputation of the Tech Design Group depends on the behavior of every one of us. Each one of us must:



- Always bear in mind the interests of the Group while working.
- Reflect the values of the Group and the current Code through their professional behavior.
- Avoid speaking or writing on behalf of TD without prior authorization.
- Avoid talking or writing about subjects in which we are not expert.
- Ensure there is no confusion between our own opinions or private interests and those of the Company.

Responsibility towards the environment



Tech Design Group respects the environment and strives to limit our environmental impact. Our goal is to speak openly about what we've done in this area, and the challenges we face in the future.

Many of our activities necessary to the manufacture, import and transport of our products have a direct effect on the environment. It is up to all of us to try and help reduce this impact wherever possible. In terms of the environment, even the smallest change can make a difference.

Each of us should:

- Support Tech Design Group's environmental projects
- Increase the use of recyclable materials and the development of bio-degradable packaging.
- Think a little more deeply about how our behavior, in every field, can have an impact on the environment, and act on it to minimize the risk. We can, for example, reduce the number of inessential journeys, save energy and water and avoid waste. When we can't avoid producing waste, we should ensure that it is recycled or disposed of in a responsible way. Even little changes can make a big difference.

Environment



Gifts and invitations



Giving gifts and invitations can improve mutual understanding and improve business relations, but can also generate conflict between private interests and professional obligations.

When receiving a gift or an invitation, the golden rule is complete transparency.

When giving a gift or an invitation, the golden rule is to keep them reasonable, and ask yourself how this could be construed by others.

Each of us must:

- Refuse gifts or invitations from suppliers unless they have only clearly symbolic value.
- Not give or receive cash gifts.
- Ensure that any gifts or invitations which we give are appropriate and in line with the values of TD. ➤ □
- Inform our superiors about any gift or invitation.



Corruption

Corruption is unacceptable and is not compatible with the TD Group's values.

It does not help any of the communities in which we do business, and represents an additional cost to the company.

Bribes are a form of corruption and are illegal in most countries, particularly when public officials are involved.

Some countries also forbid "facilitation payments"- money handed over to carry out or speed up certain administrative formalities such as permit requests or Customs passage. Most of these are, in fact, a form of corruption.

Each one of must:

- Never give, offer or promise payment in cash or services (including gifts and invitations) to public sector workers, public officials or anybody else in order to influence them.
- Never willingly carry out such payments on behalf of others. This presupposes that we take care to choose and closely monitor our sub-contractors, agents and other business partners.

Health, hygiene and safety



Everybody working for TD is entitled to a working environment which is clean, safe and risk-free.

Each one of us must:

- Adhere to Social hygiene, health and safety rules for the workplace.
- Take all reasonable precautions to maintain a safe and clean working environment.
- Ensure that our actions carry no risk for ourselves or for others.
- Ensure that we know what to do in the event of an emergency in the workplace.
- Alert our superiors to any behavior, installation or situation which may compromise the safety of our working environment, as well as any accident, however minor.

Diversity

We believe in the value of being different and consider this an important quality here at the TD Group. The different backgrounds of our team members help to stimulate creativity and build a path forward.

Each of us must:

- Avoid all forms of discrimination, especially discrimination based on:
 - Sex
 - Disability
 - Marital status
 - Sexual preferences
 - Age
 - Political and philosophical beliefs
 - Religion
 - Union membership
 - Racial, social, cultural or national backgrounds



This applies to the recruitment process and also to decisions made about training, promotion, dismissal and general working conditions, of which the determining factors are skill and experience.

- Support and promote the TD Group's commitments in the field of diversity.

Sexual harassment and workplace bullying

Every one of us has the right to respect and human dignity. Here at Tech Design, this principal is fundamental to how we work.

Any behavior or action which could impinge on this right, and especially any form of sexual harassment or workplace bullying, is unacceptable.

In the Tech Design Group, we privilege confrontation between people's facts and ideas, and never between the people themselves.

Each one of us must:

- Refrain from any sexual harassment or workplace bullying.
- Support and promote TD' commitment to a workplace free from any form of harassment. ➤

Respect one another: treat our colleagues as we would like to be treated

The right to privacy

We are all entitled to a right to privacy.

TD is committed to keeping confidential our team members' personal information (such as personal data, photos, and addresses).

TD only collects and retains information necessary to our activities.

If you have access to our team members' personal information, you must:

- Ensure that you only transmit such information within TD, and only to those who are authorized and have a good reason to receive it.
- Ensure you never pass it on to anybody outside of the TD Group, except if such information is required by law or if the team member has authorized it.
- Ensure that this information is securely stored.

Each one of us must:

- Refrain from accessing or storing team members' personal information, unless authorized and if urgently needed for the Company's activities.
- Uphold our colleagues' right to privacy.



Conflicts of interest

We must all avoid situations where our personal interests may conflict with those of the TD Group. The very existence of a conflict of interest can harm Tech Design' reputation as well as that of its team members.

Each of us (including the managers) must:

- Inform our superiors in case of any potential conflict of interest which seems or may seem to influence our judgment or our actions.
- Refrain from holding a position, function or financial interest in any of the Tech Design Group's competitors, clients, suppliers or business partner.

The manager's commitments

As a manager you have additional commitments.

You set an example and promote our code of ethics.

You are a decision maker and face more difficult and complex problems.

Your team looks to you for help and advice.



And as manager, you must handle situations which only occur on a managerial level, such as:

Operational investments and promoting teams and organizations.

Choosing suppliers and treating them fairly.

Profitability.

Competition.

Fiscal policy, etc...

Choosing suppliers

Tech Design Group's relationships with our suppliers go much further than simply purchasing goods and services, they are real partnerships. They are essential to our long term success.

We are judged on our relationships with our suppliers. In particular, our criteria for choosing suppliers and our suppliers' commitment to professionalism are closely monitored.

Each one of us in contact with a supplier must:

- Encourage supplier selection based on an open and competitive call for bids; ensure that all bids are adequately analyzed and that they are considered in a fair manner, without favoritism.
Ensure complete transparency throughout the bidding process, and send the rejected suppliers an honest report, tastefully informing them of why they were not chosen.
- Ensure that the General Purchase and Payment Conditions of our Company, including our ethical expectations, are fully understood and adhered to by all of our suppliers, no matter where they are.
- Help our suppliers meet the Tech Design Group's expectations.
- Pay our suppliers on the due date and under the terms agreed upon (to the extent that they have fulfilled their obligations).
- Refrain from demanding unreasonable concessions from our suppliers.
- Protecting our suppliers' confidential information as if it were our own.

We are proud that as a company, we have a reputation for negotiating openly and co-operating with our suppliers. Our relationships are built on impartiality, equity and loyalty, and we are committed to respecting our suppliers' independence and identity.



Competition

We respect everybody working in our professional environment, including our competitors.

We treat them in the way that we would like to be treated.

It is our duty to set a good example to the others.

It is in our interest to work in a field where business practices benefit from a good reputation. This makes our work much easier and is rewarded by our clients' trust. By sharing information with the competition about subjects such as pricing, costs or marketing strategy could give the appearance, real or perceived, that we are conducting price-fixing, territorial division, or any other kind of manipulation or distortion of the free market.

Each one of us must:

- Avoid all contact with our competitors on any confidential matter.
- Refrain from any attempt to disrupt competitor supply.
- Refrain from slandering our competitors.



Fiscal policy

TD's goal is to be a responsible corporate citizen in every country in which we do business. To achieve this, it is crucial to adhere scrupulously to all fiscal legislation and to pay all taxes both local and national that are expected of us.

Each of us must:

- Ensure that the Tech Design Group doesn't consciously shirk its fiscal responsibilities.
- Fulfill our obligations to keep full and faithful accounting records.



“Good management is born of good ethics”

Important:

If you face a problem relating to product non-compliance or operational delays, do not keep it to yourself.

If you face a problem relating to financial accuracy, regulation, administration or customs, do not keep it to yourself.

If you face a problem relating to the principles and values in this code, do not keep it to yourself.

Discuss it with your superior, with the Administrative and Financial Group management staff or to the company administration. They are there to help and support you.



This was written by:

The TD Group Ethics Committee.

(The Ethics committee meets several times per year to identify and analyze ethical problems and how they are developing. They analyze the steps taken to monitor and check ethics in terms of CSR, and propose corrective and preventive measures if necessary. The committee is made up of directors and representatives from the primary Group departments (Purchasing-production, commercial development, management and finance). It falls under the responsibility of the Administrative and Financial Director of the Group).

Angel Fu

Ethical Committee Director

Distribution:

The code has been sent to company partners, clients and suppliers.

The code has been signed by the employees (a copy is sent once per year with the pay slip).

The code is displayed on the bulletin boards in offices throughout the Group's premises.

The code is sent to everybody hired by the Group from the 1st of September 2020 onwards.

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