



ETHICS POLICY

Solid State Cooling Systems is committed to conducting all business in a fair and ethical way, adhering to the following fundamental principles:

PERSONAL INTEGRITY: We will always conduct business with honesty and integrity, to promote an environment in which we trust each other and our customers / suppliers trust us.

COMMITMENTS: We will go to great lengths to keep our commitments. We will not make promises that can't be kept and we will not make promises on behalf of the Company unless we have the authority to do so.

FAIRNESS: We will create and follow a process and achieve outcomes that a reasonable person would call just, evenhanded and non-arbitrary.

RESPECT FOR OTHERS: We will be professional and open in our communication, and receptive to influence. We will honor and value the abilities and contributions of others, embracing the responsibility and accountability for our actions in this regard.

COMPLIANCE TO THE LAW: We will respect and comply with all laws, rules and regulations where we do business. If an employee is unsure of whether a contemplated action is permitted by law or company policy, he or she should raise the question to the management team. Each employee is responsible for preventing violations of law and for speaking up if he or she observes possible violations.

CONFLICTS OF INTEREST: We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs.

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