

InTouch Services employees, clients and all vendors and factories at which we provide services shall strictly abide by this “Code of Ethics” and associated compliance principles as published in manuals, procedures and contracts. To ensure a clear understanding among InTouch, our employees, our clients and the vendors and factories where we provide services, we require that all related parties sign this document as a condition of employment, having services performed at your factory or on your products, or having services performed on your behalf.

InTouch 公司全体员工、客户及我们提供服务的所有工厂及贸易商都应严格遵守本“道德守则”，并严格遵守我们所公布的相关手册、流程及合同的规定。为确保 InTouch 公司与员工、客户、及我们所服务的工厂及贸易商之间协议明晰，我们要求所有相关各方签署本文件，以作为雇佣关系、工厂或产品服务，或其它为贵方服务之条件。

Should a factory or vendor at any time encounter an InTouch employee or representative who requests or implies he/she would like to receive a reward, gift, favor in return for, or dependent on, the outcome of any work, or any special benefit of any kind, the factory or vendor should notify InTouch management IMMEDIATELY by phone to (in English) Gabriel Miller – Director of Compliance – Shenzhen Office: +86-755-82860481 or Mobile: +86-15019493711 or (in Chinese) Chris Lee – Director of Operation - Shenzhen Office: +86-755-82860481 or +86-755-82860482. A factory or vendor is never to fulfill such a request.

如果工厂或贸易商在任何时候遭遇 InTouch 员工或代表索求或暗示要求报酬、礼物、回扣，或依据情况索求工作成果或任何形式的利益，工厂或贸易商须立刻电话通知 InTouch 公司管理层深圳办公室纪律主管 Gabriel Miller 先生（英文），电话号码：+86-755-82860481，手机：+86-15019493711，或营运主管 Chris Lee（中文），电话号码：+86-755-82860481 或+86-755-82860482。工厂或贸易商不得满足其任何要求。

Integrity and Anti-bribery 诚信和反贿赂

1. InTouch holds all of our personnel to the highest level of integrity. All InTouch employees must read, understand, and agree to our Code of Ethics. Any employee found to be in violation of this code will meet with strict disciplinary action up to and including dismissal.

InTouch 严格管理其全体员工使其保持最高程度的廉洁。InTouch 全体员工须阅读、理解并同意我们的道德守则。对任何违反该准则的员工将进行严肃的纪律处分，严重者将予解雇。

2. InTouch personnel are never to accept bribes, gifts or favors of any kind. Employees who have been made such an offer must report the occurrence to management immediately. Employees are to kindly refuse any small offerings such as individual cigarettes, tea, coffee, gum, etc., with the exception of water.

InTouch 人员不得接受任何形式的贿赂、礼物及其它好处。受到这些贿赂的员工须立即将该情况汇报给管理人员。员工应委婉拒绝任何除了水以外的小恩惠，如烟、茶、咖啡或口香糖等。

3. InTouch prohibits (a) the offering, giving, or accepting of a bribe in any form, including kickbacks on any portion of a contract payment, or (b) the use of other routes or channels for provision of improper benefits to, or receipt of improper benefits from customers, agents, contractors, suppliers, employees of any such party or government officials.

InTouch 严格禁止：（a）任何形式的收受贿赂行为，包括合同款中的任何比例的回扣，或（b）利用其它途径或渠道向客户、代理商、承包商、供应商或该类公司的员工或政府官员提供或索取不当利益。

4. InTouch's work will be carried out in a professional, independent and impartial manner at all times. All employees are to report all data, test results and other findings accurately and honestly no matter what the result, with no tolerance for any deviation from approved methods and procedures or the reporting of accurate results. InTouch employees and the factories/vendors at which InTouch provides services should always act in good faith. InTouch staff and management will never attempt to influence the result of a service rendered in the interests of company or personal gain (i.e. favoring a FAIL or HOLD result in order to encourage the demand for more services).

InTouch 永远以专业、独立和公正方式进行工作。无论结果是什么，所有员工都准确地、真实地汇报所有数据、测试结果和其它问题发现。对于规定的方法和流程，或对准确结论的报告，不容许有偏离。InTouch 员工和其所服务之工厂/贸易商须永远诚实。InTouch 员工和管理人员不会因公司或个人利益而对服务工作的结果施加影响(比如，偏于给予 FAIL 或 HOLD 结果以谋取更多业务工作)。

5. InTouch and its employees shall carry out its work in accordance with all laws, legislation, and regulations of the countries in which it operates.

InTouch 和其员工应按照所在国法律法规进行工作。

6. InTouch encourages open and honest communication between staff and management at all times. We encourage all employees to speak freely about concerns, problems, and any issues they encounter in work or personal life about which they feel the need to discuss. In the event that an employee is unsure if there has been a violation of our Code of Ethics he/she must contact his/her team leader or top level management to consult. All communication thereafter will be kept confidential within reasonable bounds to protect the source of the information. All employees are required to inform management of any condition that creates a danger to the environment, poses health or safety hazards, or may be a violation of law or ethical conduct. InTouch provides facilities to enable confidential reporting of such conditions.

InTouch 鼓励员工与管理层在任何时候公开坦诚的沟通。我们鼓励所有员工直接坦率告知其工作或个人生活中遇到的问题、困难或疑惑。当员工无法确定某行为是否违反我们的道德守则时，应向其主管或高层管理者咨询请教。所有此后沟通内容将予以合理范围内的保密以保护信息源。

7. All InTouch work is subject to periodic audit by trained personnel regarding applicable laws, regulatory requirements and InTouch company policies and procedures. Corrective actions will be taken in a timely and effective manner and will be monitored, tracked and reviewed by InTouch management.

InTouch 所有工作都由训练有素人员依据适用的法律、法规要求和公司政策和程序进行定期审查。并及时有效的采取校正措施，且对这些措施进行监管、跟踪，并由 InTouch 管理人员审核。

8. InTouch employees are prohibited from engaging in the following activities with personnel from any vendor or factory at which InTouch performs services (even if the employee engaged is not directly involved in those services), unless there is explicit and written approval provided by the InTouch Director of Compliance:

- a) The consumption of any form of alcohol.
- b) Attendance of KTV, Karaoke, sight-seeing, sport activity, or any leisure activity.
- c) Any activity outside of the normal realm of the work that InTouch is providing.

InTouch 公司禁止员工（即使是没有直接参与为该工厂或贸易商服务工作的员工）与工厂或贸易商人员之间进行下列活动，除非经纪律主管明确的书面同意：

- (a) 任何形式的酒类消费；
- (b) 参与 KTV，卡拉 OK，观光，体育活动或任何休闲活动；
- (c) 任何不在 InTouch 指派工作范围以内的活动。

9. While InTouch is a customer centered company, it will not tolerate any breach of ethics, law, or company policy in order to satisfy customer requirements, whether stated or implied. Any attempt to subvert this policy is to be reported to InTouch executive management either through normal channels or the confidential facility. Furthermore, InTouch will represent the interests of its clients' only to the extent that the client's interests are fair and reasonable. InTouch will not take responsibility for or attempt to impose on any factory or vendor the unreasonable or unfair demands of a client.

尽管 InTouch 是高度的以客户为中心提供服务，但不容许任何以违背道德、法律或公司政策的方式来满足客户明确提出的或暗示的要求。任何破坏该政策的尝试都会以正常渠道或机密方式汇报给 InTouch 高层管理。此外，InTouch 公司代表客户利益仅限于客户利益在公平和合理的范围之内。InTouch 公司将不承担客户任何或者试图强加给工厂或供应商的不合理或不公平的要求的责任。

10. Vendor/Factory Disagreement – Vendors and factories have the right to respectfully disagree and provide explanation and/or evidence of their position in the case that they oppose an InTouch result or procedure. In such cases InTouch will make its best effort to record all such explanation/evidence and report it clearly back to the client. Furthermore in the case of disagreement the vendor/factory is encouraged to write down any remarks on the appropriate acknowledgment form which is later provided to the client. The vendor/factory may also contact directly with InTouch management to express such concern. However, the vendor/factory should at no time raise their voice with, forcibly argue, or in any way threaten an InTouch auditor or other employee in an attempt to express their discontent with an InTouch employee's judgment or in an effort to affect the outcome of a service rendered. 贸易商/工厂异议 – 贸易商和工厂有权以尊重的态度对 InTouch 的检验结果或程序提出异议，并从自己的立场进行解释或证明。在这种情况下，InTouch 会极尽全力将这些解释/证明记录并清楚明晰地向客户汇报。此外，在有异议的情况下，鼓励贸易商/工厂在相关确认单上写下备注，其后将此提供给客户。贸易商/工厂也可以与 InTouch 管理人员直接联系说明该情况。但是，贸易商/工厂在任何时候都不得对 InTouch 检验员或员工大声呵斥，或与其强行争执，或以其它方式进行胁迫，以此方式表达对 InTouch 人员判定结果的不满，或以此方式对所做业务结果施加影响。

Confidentiality 保密

11. All data and information either provided by, or related to our client or client's product is to be kept confidential at all times, other than what must be released in order to complete our job. Data is never to be given to any party outside of InTouch except, as necessary, to the factories and consultants who are directly related to providing quality services to our clients. InTouch shall treat all information received in the course of the provision of its services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.

在任何时候，无论是由客户提供，还是与客户或客户产品有关的所有资料和数据，除非为完成工作而必须发布外，都将予以保密。数据不会对 InTouch 以外的任何方披露，除非在必要情况下，会披露给直接负责对我们客户提供服务的工厂或咨询方。InTouch 在提供服务过程中收到的所有数据资料都上升到商业机密的高度，并认为这些数据资料既然未在公共领域出现，就属于未曾公开的资料，一般只向第三方提供。

Conflict of Interest 利益冲突

12. InTouch and its employees will at no time involve itself with buyers or sellers in a way that creates a conflict of interest to our mission.

InTouch 和其员工在任何时候都不能因牵涉买卖双方而造成与我们公司使命之间的利益冲突。

13. InTouch employees are prohibited from engaging in any personal business transaction with any factory, vendor, client or supplier with which InTouch does business or performs work with, unless there is explicit written consent from InTouch executive management. This includes but is not limited to buying from, selling to, providing services for or working on behalf of the factory, vendor, client or supplier.

InTouch 禁止员工与任何 InTouch 有生意联系的工厂、贸易商、客户或供应商之间进行个人商业交易，除非由 InTouch 高层书面同意。这些交易包括但不限于与工厂、贸易商、客户或供应商进行买卖，或为其工作、提供服务等。

Meal Policy 用餐政策

14. In most cases InTouch employees will take measures to eat on their own, not with the factory. In the case that the factory provides lunch for an InTouch employee on-site at a factory location (take-in meal) the factory may do so if it so desires, but at no more than the value of 20 RMB per InTouch employee. The factory is in no way requested or required to provide this service and InTouch employees are prohibited from requesting it. In the case that the factory takes an InTouch employee other than executive management off-site to dine, such an event MUST be approved beforehand by a phone call from the InTouch employee to a member of InTouch's senior management. As mentioned above in this document, all InTouch employees are prohibited from consuming alcoholic beverages with any factory staff.

大部分情况下，InTouch 员工设法自己负责饮食而不与工厂一起吃饭。如果确实需要工厂在现场提供快餐给 InTouch 员工，其价值每个员工不能超过 20 元人民币。InTouch 绝不要求或请工厂提供此项服务，也禁止员工向工厂要求。如果工厂带 InTouch 非高层管理的员工外出用餐，务必由 InTouch 员工事先电话获得公司管理层批准。如前文所述，InTouch 禁止所有员工与工厂人员消费酒类饮料。

Transportation Policy 交通政策

15. In most cases InTouch employees will rely on InTouch vehicles and public transportation to go to and from the factory. In some cases, and as reasonable, the factory may provide assistance with transportation such as pick-up from or drop-off at the local bus station, train station or airport. InTouch employees shall make no unnecessary or unreasonable demands on the factory for transportation assistance. In the instance that equally safe and secure transportation is available publicly (such as private car rental, bus, train, etc.) InTouch employees should seek such methods first. In regard to this policy factories and vendors should, however, always act in good faith and with the concern for the InTouch employee's wellbeing, as InTouch employees are often traveling in remote and unfamiliar areas.

在大部分情况下，InTouch 员工借助于公司车辆或公共交通设施往返工厂。在一些合理情形下，工厂可以提供车辆协助在公交车站、火车站或机场接送。InTouch 员工不得向工厂要求不必要的或不合理的交通协助。在同样稳妥、安全的交通工具（如私家车、公交或火车等）具备的情形下，InTouch 员工应优先选择这些方式。尽管有此政策，但因 InTouch 员工经常旅行于偏僻和陌生区域，工厂和贸易商应真诚行事，并为 InTouch 员工之福祉考虑。