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## Anti-Bribery and Anti-Corruption Policy

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Source Photonics, Inc. (“Source” or the “Company”) has a strict policy prohibiting bribery and corruption in the conduct of our business in the United States or abroad. This policy applies to all officers, directors, employees, representatives, consultants, middlemen, or other agents of the Company anywhere in the world (together “Source Employees”).

### Bribery of Government Officials

No Source Employee should directly or indirectly offer or pay, or authorize an offer or payment, of any money or anything of value to any government official which is intended to influence corruptly the judgment of the recipient in exercising his or her duties, or to secure preferential treatment or improper advantage for the Company. The Company expects every Source Employee to conduct all aspects of Company business with integrity - including research, testing, registration, marketing and sales - regardless of local manners and traditions.

All Source Employees, must comply fully with local anti-bribery and anti-corruption laws and the anti-bribery and anti-corruption laws and regulations of the United States, including the Foreign Corrupt Practices Act (“FCPA”), which prohibits the making or offering of any payment to any non-U.S. government official to corruptly induce that official to affect any governmental act or decision or to assist the Company in obtaining or retaining business. In addition, U.S. law prohibits the bribery of U.S. government officials, including an “employee or person” acting for or on behalf of the U.S. If there is a real or apparent inconsistency or conflict between the requirements of U.S. law, local law and Source policy, Source requires compliance with the most restrictive standard.

For the purposes of this Policy, “Government Official” is broadly interpreted and includes: (i) any elected or appointed government official; (ii) any employee or person acting for or on behalf of a government official, agency, or enterprise performing a governmental function; (iii) any political party, officer, employee, or person acting for or on behalf of a political party or candidate for public office; (iv) an employee or person acting for or on behalf of a public international organization, such as the World Bank or United Nations, or (v) any employee or agent of a business entity that is substantially owned or controlled by a foreign government (a “state-owned” or “state-controlled” enterprise), such as a government owned telecom company. “Government” is meant to include all levels and subdivisions of governments (i.e., local, regional and national, and administrative, judicial, legislative and executive).

### Commercial Bribery

It is against the policy of the Company for any Source Employee, directly or indirectly, to engage in commercial bribery. Engaging in commercial bribery is unlawful under U.S. federal and state law, as well as under the laws of a number of countries outside the United States. Moreover, this type of conduct is an unfair trade practice under U.S. law, in view of the possible advantage that a seller might obtain over competitors by secretly influencing employees or agents of purchasers.

The term “commercial bribery” means granting, or agreeing to grant, any benefit to any employee, agent or fiduciary of another party without the knowledge of the latter’s employer or principal, with the intent that the agent will influence the principal’s commercial conduct. Examples of such conduct could include paying money or giving a gift to an employee of a customer, in the hope of having the employee influence the customer to purchase products of the Company. Similarly, commercial bribery could involve the payment of a commission by a seller to an agent of a buyer, where the agent retains the payment for the agent’s own use and benefit.

### Reporting Violations

Source Employees who know of, or reasonably believe there is, or imminently will be a violation of this Anti-Bribery and Anti-Corruption Policy or any related policies and procedures, must report that information immediately to the Chief Executive Officer.