

CODE OF CONDUCT

At GreenSoft Technology, Inc. ("GreenSoft"), we are committed to our mission of streamlining the environmental compliance management process of the green supply chain by providing the best green data services and green product management software for the global electronics industry. GreenSoft's services and software help companies reduce risk and meet growing and changing compliance requirements worldwide.

The following GreenSoft Code of Conduct explains our corporate and social responsibility, and sets the minimum standards that GreenSoft requires from all employees and suppliers who produce goods or perform labor for GreenSoft.

PERSONAL AND BUSINESS BEHAVIORS

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct.

Management must implement a culture where all workers feel safe and are respected by their colleagues. The need for a respectable and dignified working environment must be communicated so that everyone understands the boundaries of acceptable behavior.

Any form of discrimination, preferential treatment, verbal abuse or any other form of behavior that is disrespectful or intimidating must be thoroughly investigated. If proven, it must be dealt with through a formal disciplinary process.

WHISTLEBLOWER AND REPORTING POLICY

At GreenSoft, everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

GreenSoft will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not retaliate against employees who raise genuine ethics concerns in good faith.

Employees are encouraged, in the first instance, to address such issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or HR, GreenSoft's President does operate with an open-door policy.

Whistleblower protections are provided in two important areas: confidentiality and retaliation. As much as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be

disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense. Employees may report issues anonymously if they feel more comfortable doing so.

In addition to reporting issues to management without fear of retaliation, employees may also report activity that violates the policy prohibiting trafficking in persons to the Global Human Trafficking Hotline at 1-844-888-FREE or its email address at help@befree.org.

COMPLIANCE WITH ALL APPLICABLE LAWS & REGULATIONS

Employees, suppliers and all operations of GreenSoft must fully understand and comply with all applicable laws and regulations in countries where they operate, including laws relating to employment, health and safety, and the environment.

ENVIRONMENTAL IMPACT

GreenSoft is committed to minimizing our impact on the environment and doing our part to reduce pollution and waste. In addition to complying with all applicable laws and regulations pertaining to the environment, we also ask our employees to use energy efficiency measures such as switching off lights, reducing the use of water, and using reusable materials whenever possible.

GreenSoft also allows a majority of its US and European employees to work from home, which allows employees to significantly reduce transportation emissions and fuel usage.

Because GreenSoft supplies services and electronic software rather than a physical product, we do not purchase parts from a supply chain or have any manufacturing operations, which further enables the company to have a low carbon footprint and environmental impact as a whole.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

All work performed for GreenSoft must be voluntary and not done under any threat of penalties, sanctions or violence. Indentured labor is prohibited and workers are free to leave work at any time, with all salary owed to be paid. All workers are required to report suspected breaches of the policy to management and shall not face retaliation for doing so. Child and migrant labor are included in these protections.

GreenSoft will not tolerate abuse of human rights within any part of our business or supply chain. We will take any allegations of human rights violations, modern slavery or human trafficking seriously. If you have any reason to believe that such activity is taking place within GreenSoft or any part of GreenSoft's operations, please report this to your manager.

TERMS OF EMPLOYMENT

All workers, including those on part-time, temporary or agency contracts, must have conditions of employment that meet local legislations. This includes wages, payment frequency, deductions, benefits, working hours, holidays, notice periods, sick pay, family leave and any other locally required aspects of employment.

All workers must be employed voluntarily and have the freedom to leave their employment with all wages owed paid to the employee. There must not be any form of social pressure, unpaid loans or other restrictions imposed by the employer that would restrict this freedom.

ACKNOWLEDGEMENT OF RECEIPT

I certify that I have read and agree to abide by the above GreenSoft Code of Conduct.

Employee Name

Employee Signature

Date