



Employees have an affirmative obligation to report known or suspected violations of ZOOK's Ethics and Integrity Policy.

Diversity and Inclusion

ZOOK is committed to creating and maintaining an environment in which all employees are treated with respect and differences are highly valued.

At ZOOK we work to foster an inclusive environment that provides equal opportunity to our employees, customers, suppliers and the community. By creating a company culture that is free of harassment or discriminatory treatment of any form, every employee can have the opportunity to contribute fully to our business success.

Safety, Health and the Environment

At ZOOK, the health and safety of each individual is of primary importance.

ZOOK is committed to practices that generate safe workplace actions, conditions and procedures, and we continually work to develop and maintain a safe and healthy operating environment. ZOOK is a responsible corporate citizen, protecting and conserving the natural environment. We comply with all accepted environmental standards, meeting and often exceeding applicable regulatory and legal requirements. We are continually improving our environmental performance, working to minimize the creation of solid and liquid waste and eliminating other practices that could have a harmful effect on the environment.

Product Safety and Quality

Because all of our actions can impact ZOOK products and services, we all share in the commitment to, and responsibility for, safety and quality in the products we make.

ZOOK is committed to manufacture products that meet or exceed all applicable laws, regulations, voluntary standards and industry practices. Acknowledging the trust customers and end-users place in us, we strive to produce high-quality products and services with a commitment to continuous improvement in product performance. Through this dedication, we can create products that consistently earn high marks for safety.

Company Property and Information

All employees are responsible for safeguarding ZOOK's assets from misuse or misappropriation, whether those assets are intangible, such as business information and intellectual property, or tangible, such as equipment or supplies.

- Company records, property, technical information, communications and business opportunities constitute valuable assets that can be critical to ZOOK's performance and competitive edge. These materials are the property of the company and, like all assets, should be safeguarded against misuse or misappropriation and used only to further ZOOK's business objectives.
- Safeguarding these assets includes taking the appropriate steps to prevent and identify accidental disclosure. These responsibilities and restrictions apply equally to electronic information methods and prohibit accessing or creating any electronic communications that contradict ZOOK's policies.



Books, Records and Filings

Employees are required to keep accurate records and provide full, fair, accurate, timely and understandable disclosures in the periodic reports filed by ZOOK with regulators and in our public communications.

- ZOOK's relationship with its shareholders is built upon our reputation for honesty and integrity in financial and related reporting. ZOOK makes every effort to ensure that information contained in documents filed with governmental or regulatory bodies is complete, fair, accurate, timely and understandable. In addition, we are each required to ensure the accuracy of any records we develop or review, including financial records, expense reports and engineering/technical documents.
- It is ZOOK's policy to cooperate in government investigations and inquiries. All subpoenas, summonses, information requests relating to legal proceedings, or other inquiries or communications from a law enforcement officer or agency, a court or a lawyer are referred immediately to ZOOK's legal counsel. This includes interview requests, document requests or any other requests about an investigation or litigation.
- Destroying or altering a document with the intent to impair the document's integrity or availability for use in any government investigation or legal proceeding is a crime. Documents relevant to any pending, threatened, or anticipated litigation, investigation, or audit will not be destroyed for any reason. Any belief that company records are being improperly altered, destroyed or otherwise treated inconsistently with ZOOK's record retention policies must be reported to ZOOK's legal counsel.
- Efforts to mislead or coerce independent auditors or members of the internal audit staff concerning issues related to audit, accounting or financial disclosure is a violation of this policy and can have serious legal consequences.

Intellectual Property, Confidentiality and Privacy

ZOOK is often entrusted with confidential or proprietary information by customers and other business interests. This information is safeguarded in the same manner as ZOOK's information.

- Inventions, ideas and other forms of intellectual property are a vital part of ZOOK's success. As a result, we are diligent about protecting valuable company technology through patents, trademarks or other methods. ZOOK is equally committed to avoiding the unauthorized use of the intellectual property of other companies and individuals.
- ZOOK protects company data and knowledge through its IT policies. These policies provide guidance on safeguarding ZOOK's business information and assets from unauthorized access or disclosure and ensure that information transmitted over ZOOK's communication systems is properly controlled.

Insider Trading

By protecting confidential and proprietary information from unauthorized disclosure, we not only protect valuable company assets, we also help ensure compliance with insider trading laws.

Misuse of ZOOK information, and a violation of the law, is insider trading; when an individual uses material nonpublic information acquired in the course of employment to buy or sell stock or other securities. It is unethical and unlawful to use such information or to disclose it to others who might use it in buying or selling such securities.



Conflicts of Interest

Employees must avoid conflicts between personal and ZOOK interests. If actual or apparent conflicts are unavoidable, legal guidance should be sought on the best course of action, with full disclosure of any transaction or relationship that reasonably could be expected to give rise to a conflict.

- Employees are expected to exercise good judgment and the highest ethical standards in activities on behalf of ZOOK, and also activities outside the company that may have an impact on how ZOOK is viewed by others. Employees must avoid any action that has the potential or appearance of impacting the company adversely, or interfering with ZOOK's best interest.
- Employees must also be aware of customer and supplier policies regarding gifts and entertainment, and abide by such policies. Business entertainment must be legal, reasonable, infrequent and justifiable.

Business and Governmental Regulations

All employees, including agents and representatives of ZOOK, will comply with all applicable laws in every country in which ZOOK does business. This policy prohibits the company; its employees, directors, and officers from making offers of, or payment to, directly or indirectly, any domestic or foreign official, political parties or candidates, to create an improper advantage to obtain preferential governmental treatment.

Advisors (i.e. agents, consultants, or intermediaries engaged to assist in developing, expanding or maintaining ZOOK's business) will be appointed, managed and compensated as determined appropriate at the time by ZOOK senior management.