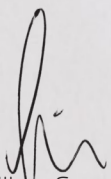




CODE OF CONDUCT

"The nine eyewear Code of Conduct is our set of rules outlining the responsibilities and proper practices that we work by"



Jens William Sørensen, founder
December 2013, nine eyewear A/S

nine eyewear

nine eyewear A/S designs, manufactures and markets eyewear and related accessories to consumers around the world. Since 2010 nine eyewear has developed from a local Danish company into an international company with customers all over the world.

Today, nine eyewear is one of the world's leading manufacturer and marketers of high-quality eyewear. nine eyewear has attained this position through constant innovation and sound business principles. However, it is just as crucial to the success of nine eyewear, that the company leads the way when it comes to good corporate citizenship.

No matter where in the world nine eyewear operates, this is done according to a set of principles, which stipulate that we will behave in a correct and decent manner. This is our heritage as a Danish company. The principles apply to employee relations, to environmental considerations and to relations with our business partners.

The respect for other people and cultures is deeply rooted in our company.

nine eyewear will only achieve long-term business success by demonstrating good corporate citizenship, which in turn can only be secured if the business is based on constant achievement of good results.

This is the very heart of the nine eyewear Code of Conduct as regards sustainable development, issues related to religion, employee relations, health and safety, environmental protection and community relations.

It is essential to nine eyewear that the nine eyewear Code of Conduct is an integral part of the entire value chain. We therefore also expect our external suppliers, wholesale and retail customers to acknowledge and respect the nine eyewear Code of Conduct. We regularly control that the nine eyewear Code of Conduct is being complied with.

HUMAN RIGHTS

nine eyewear has its origins in Denmark. This background is naturally reflected in the point of view on human rights by nine eyewear. nine eyewear wants all its employees to be treated with respect and dignity.

nine eyewear recognizes that all human beings are entitled to all the rights and freedoms set forth in the UN Declaration of Human Rights.

EMPLOYEE RELATIONS

Non-discrimination

nine eyewear shall not deny employees opportunities or otherwise discriminate employees based on race, gender, age, religious or political beliefs, or maternity status.

nine eyewear shall respect all relevant employment laws and regulations in the countries in which they operate.

Compulsory Labor

nine eyewear shall not use work or services that are extracted from any person under menace of any penalty, and for which that person has not offered himself or herself voluntarily - e.g. slavery, bonded labor, debt bondage, or other exploitative practices.

Working Terms

nine eyewear shall ensure that the working hours of the employees are in compliance with legally set working hours in the countries in which nine eyewear is operating.

nine eyewear shall allow employees at least one day off in seven.

nine eyewear shall provide wages and benefits in such a way that they are not less than the minimum wages

set by applicable law and match the prevailing local industry practices.

nine eyewear shall ensure that each employee is provided with a specification for every wage period and shall not deduct any pay from the employee's salary for any disciplinary infractions.

Child Labor

nine eyewear will ensure that the UN Convention on the Rights of the Child is respected. It prescribes that children must not carry out work that is harmful to them, that children are entitled to be heard on issues affecting their lives and that all decisions must be taken in accordance with the child's best interests.

nine eyewear will ensure that children are protected from economic exploitation and from work which may be dangerous to their health, or may interfere with their education or may hinder their physical, mental, spiritual, moral or social development.

The minimum age limit accepted by nine eyewear is 15 years.

Children from 15 to 18 years of age must never participate in any form of strenuous or potentially hazardous work.

Children from 15 to 18 years of age should always be closely monitored and helped through training and frequent consultations with their superior. The child's best interest must be the primary concern.

HEALTH AND SAFETY

nine eyewear works hard to prevent accidents at work. While accidents are difficult to avoid altogether, it is important that all nine eyewear suppliers make every effort

to avoid accidents and continue to improve the safety of all employees.

nine eyewear will ensure that the efforts to improve the safety and the health of the employees as a minimum are in accordance with the local legislation and local culture.

nine eyewear requires that adequate lighting, heating, ventilation and exhaust systems are installed at the workplace of our suppliers.

ENVIRONMENT

nine eyewear business strategies and success must be based on environmental responsibility and sustainable development. This is done by reducing the use of materials, energy resources and waste, prevention of pollution and, if possible, by recycling of waste from production units.

nine eyewear wishes to minimize the use of chemical and harmful substances in connection with the manufacturing of products or parts of products.

nine eyewear will reward suggestions for improvement of practices and procedures, which will be beneficial to the environment.

nine eyewear

- is a guest in each of the countries in which it operates and will as such respect the culture of the individual country.
- respects and has a proactive approach to the protection of internationally defined human rights.
- respects equal opportunities and supports abolishment of discrimination in the workplace.
- respects a person's right to freedom of religion.
- respects the right to freedom of association.
- wishes employees to have access to a workplace free of harassment or abuse and condemns any forms of compulsory labor.
- supports the UN Convention on the Rights of the Child.
- aims to promote sustainable development.
- wishes to ensure that the conduct of its business as an absolute minimum always comply with all relevant laws and regulations.