



## CODE OF CONDUCT FOR REVOLUTION LIGHTING TECHNOLOGIES, INC. SUPPLIERS

This Code of Conduct sets forth minimum requirements of any entity providing goods and services to Revolution Lighting Technologies, Inc. (RVLT). We seek out business partners who share in our culture, values and business practices. These requirements are consistent with our commitment to conduct business fairly and honestly and are applicable to all Suppliers and their respective affiliates and subsidiaries globally.

### 1. LEGAL COMPLIANCE

We expect all of our employees and business partners to adhere to all applicable laws and regulations applicable to the operations of a respectable business.

### 2. BUSINESS INTEGRITY

Anti-Corruption / Anti Bribery: RVLT and its partners will not tolerate corruption, bribery, embezzlement or fraud in any form. This includes giving or receiving anything of value, including money and gifts or unlawful incentives to improperly influence negotiations or any other dealings to assist the Company in obtaining or retaining business or securing any improper advantage. Our partners should be aware that it is not permissible for RVLT employees to be entertained in such a manner as to cause the employee to feel obligated to make certain business decisions.

Ethical Behavior: Our partners are expected to avoid conflicts of interest and operate honestly and ethically in accordance with applicable laws pertaining to: anti-competitive business practices, respect and protection of intellectual property, company and personal data, export controls and sanctions.

Intellectual Property: Our partners shall take appropriate steps to safeguard and maintain confidential and proprietary information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

Insider Trading: Our partners and their personnel must not use any material or non-publicly disclosed information obtained in the course of their business relationship with RVLT as the basis for trading or for enabling others to trade in stock or securities of any company.

Conflict of Interest: Our partners are expected to report to RVLT any situation that may appear as a conflict of interest, and disclose to RVLT if any RVLT employee or professional contract with RVLT may have an interest of any kind in the suppliers business or any kind of economic ties with the supplier. If a supplier employee has a family relation (spouse, parent, sibling, grandparent, mother –or father-in-law, or same or opposite sex domestic partner) to an employee of RVLT, or if the supplier has any relationship with an employee of RVLT that might represent a conflict of interest the supplier should disclose this to RVLT.

### 3. LABOR PRACTICES, HEALTH AND SAFETY AND THE ENVIRONMENT

Our partners are expected to provide their employees with a fair and ethical workplace and comply with the applicable laws, regulations, and wages. In addition, we expect that our partners will comply with all applicable environmental regulations and provide a safe and healthy working environment.

### 4. SUSPECTED VIOLATIONS OF THIS CODE

In the event that one of partners believes there has been a breach of this code, please immediately contact our Chairman, Chief Executive Officer and President, Robert V. LaPenta directly at (203) 504 1100.