

CONFLICTS OF INTEREST AND CONFIDENTIALITY

Ethics Policy

Statement of Purpose

The purpose of this policy statement is to reaffirm strong Company commitment to the highest standards of legal and ethical conduct in its business practices and to ensure that all employees adhere to proper and legal ethical standards in their business relationships. People feel pride in an organization built upon honesty and integrity.

Policy on Responsible Behavior

As an integral member of the Company, you are expected to accept certain responsibilities, adhere to acceptable business principles, and matters of personal conduct, and exhibit a high degree of personal integrity at all times. This not only involves sincere respect for the rights and feelings of others, but also requires that you refrain from any behavior that might be harmful to you, your co-workers, or FirstLight, or that might be viewed unfavorably by current or potential customers, or by the public at large. You are encouraged to observe the highest standards of professionalism always.

Use of Good Judgement

It is virtually impossible to site examples of every type of activity which could give rise to a question of unethical conduct. Therefore, it is important that each of us rely on our own good judgment in the performance of our duties and responsibilities. When situations occur where the proper course of action is unclear, you should request advice from your supervisor. You may also reach out to the Company's General Counsel. The reputation and good name of FirstLight depends entirely upon the honesty and integrity of each one of us.

Gifts

Employees may not give or receive any gifts or favors to or from any customer, supplier, or competitor (other than a gift of nominal value - \$100.00 or less) without the prior consent of Human Resources. In no event, shall an employee give or receive a gift in the form of cash. Attendance at a reasonable business meal or event (such as sports, arts, etc.) is permissible and does not require the prior consent of Human Resources. It is impermissible and may be unlawful to give, offer or promise anything of value for the purpose of influencing someone in connection with Company business or a Company transaction. Similarly, it is impermissible and may be unlawful to solicit, demand, or accept anything of value with the intent of being influenced or rewarded in connection with any company business or transaction.

Company-sponsored events, promotional campaigns, and reasonable customer entertainment expenses are permissible.

Conflicts of Interest

Employees are prohibited from partaking in any activity or association that creates or appears to create a conflict between the employee's personal interests and FirstLight's business interests. In addition, an employee must not allow any situation or personal interests to interfere with the exercise of independent judgment, or with that employee's ability to act in the best interests of FirstLight.

As a result, we expect that employees will not participate in, through action or communication, any disloyal, harmful, disruptive, competitive, or damaging acts toward the Company. We also prohibit employees from accepting positions of employment with direct competitors or companies with whom FirstLight conducts business.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of FirstLight's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage. No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of FirstLight as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties. However, it shall be a violation of this section for an employee to have an undisclosed personal business relationship with a vendor of the Company for which the employee participates in the Company decision making process to engage the vendor. All such relationships must be disclosed to the Company's General Counsel who may grant a waiver of the prohibition in consultation with the Company's CEO.

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which FirstLight wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Please contact the General Counsel for more information or questions about conflicts of interest.

Outside Employment

A FirstLight employee may engage in employment outside the company. However, no employees may engage in outside employment which in any manner interferes with the proper and effective performance of the duties of their position in the company, or results in a conflict of interest with FirstLight's business interests. All employees must inform their supervisors and Human Resources of their outside employment including any self-employment. If the company determines that such outside employment is disadvantageous to the Company, the employee shall be notified in writing. Any employee who engages in employment outside their regular working hours are expected to perform their regular duties first, and outside work cannot be performed on Company time.

Use of Company Property

Company property is to be used solely for the Company's business interests and cannot be used for personal use unless prior approval has been given to the employee. Employees are reminded that the benefits of any promotions offered by suppliers are the property of the Company and cannot be used personally by employees without the prior consent of FirstLight.