

ModusLink Global Solutions, Inc.

LABOR AND ETHICS STATEMENT

ModusLink Global Solutions, Inc. and each of its subsidiaries (“ModusLink” or the “Company”) operate their business with high ethical standards and a commitment to fairness. This Labor and Ethics Statement (this “Statement”) is not intended to address every instance in which we are called upon to observe and practice sound business ethics. However, it is meant to remind us that if we each strive to live and abide by basic ethical principles in the day-to-day conduct of our business, we foster an environment of mutual trust and respect, and continue to build on our global reputation for integrity.

To that end, we believe that all directors, officers, employees and contractors or other representatives of the Company have a responsibility to ensure that our business is conducted within these principles:

- Our policy is to operate within all applicable laws and regulations. To this end, where applicable, we have identified specific country legislation or rules under the heading “Specific Country Laws and Regulations”;
- Discrimination or harassment will not be tolerated;
- No bribes shall be given or received;
- Conflicts of interest must be avoided;
- We aim to be a responsible partner within our local communities;
- Employees are encouraged and supported to report, in confidence, any suspected wrongdoing;
- Our goal is 100% compliance, and we will investigate all reports of abuse, discrimination and harassment.

Freely Chosen Employment

ModusLink prohibits the use of forced, bonded, indentured labor, involuntary prison labor, or slavery and does not participate in the trafficking of persons. All work must be voluntary, and employees are free to terminate their employment in accordance with their contracts, if applicable, or at-will, if applicable in the absence of a contract, and any applicable notice periods at any time. ModusLink does not hold or otherwise destroy, conceal, confiscate or deny access by employees or contractors to the individual’s identity or immigration documents, such as government-issued identification, passports or work permits.

Child Labor Avoidance

ModusLink prohibits the use of child labor at all its facilities.

Working Hours

Unless required by applicable law otherwise, employees may be required to work reasonable additional hours in excess of or outside their ordinary hours from time to time, including on weekends and public holidays. However, employees will not be required to work excessive and unreasonable amounts of overtime as stipulated by applicable laws. Where applicable law so provides, employees shall be compensated for rest days.

Wages and Benefits

Compensation paid to all employees must comply with all applicable labor laws and regulations.

Humane Treatment

ModusLink will not tolerate any inhumane or threatening treatment of employees.

Non-Discrimination

ModusLink is committed to a workforce free of harassment and unlawful discrimination. The Company does not engage in unlawful discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital or civil status or any other attribute protected by applicable local laws such as, among other things, ancestry, place of origin, citizenship, record of offenses, family status (being in a parent-child relationship), in hiring and employment practices, including wages, promotions, rewards, and access to training. Employees are provided with reasonable accommodation for disability and religious practices.

Freedom of Association

ModusLink ensures employees have the freedom to associate or to collectively bargain without fear of discrimination and the Company encourages direct communication between employees and management through its Open Door policy and Town Hall meetings.

ModusLink's success depends on the commitment of all employees to ensure these high standards globally. The Company applies these standards to all interactions with employees, clients, suppliers and other stakeholders. Any employee, client, supplier, or other stakeholder who has concerns about a practice or behavior that they believe to be in violation of these standards is encouraged to bring that concern to a member of the management or Human Resources team, either in person or via our ethics hotline Ethics Point at www.ethicspoint.com.

Business Ethics and Conduct

Business Integrity

ModusLink commits to ethical and fair business practices. The Company exercises a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

No Improper Advantage

Any bribes or other means of obtaining undue or improper advantage must not be promised, offered, authorized, given or accepted and ModusLink does not permit the establishment of accounts or internal budgets for the purpose of facilitating bribes or unlawfully influencing transactions.

Disclosure of Information

Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of supply chain practices is unacceptable.

Intellectual Property

Intellectual Property rights are to be respected. The transfer of technology and know-how is to be done in a manner that always protects intellectual property rights and customer information is to be safeguarded.

Fair Business, Advertising and Competition

All standards of fair business, advertising and competition are to be upheld. Client information is safeguarded and all employees and contractors share the responsibility to prevent unauthorized access, use, modification, destruction, theft or disclosure of such information.

Protection of Identity and Non-Retaliation

ModusLink protects those who are witness to any wrongdoing and encourages all employees to remain vigilant against such possible actions. Ethics Point ensures, as far as reasonably practicable and in accordance with applicable law, the confidentiality, anonymity and protection of whistleblowers. Discrimination, victimization, penalization and persecution of employees who raise genuine concerns will not be tolerated and support for whistleblowers will be provided as appropriate ensuring all employees can raise any such concerns without fear of retaliation.

Privacy

ModusLink takes seriously the protection and privacy expectations of personal information for everyone we do business with, including suppliers, clients, consumers, employees and contractors. Our policy is to collect only personal information which is relevant and necessary for business functions and in accordance with applicable local laws.

Proper controls and procedures are followed for the creation and maintenance of personnel records for employees. ModusLink is responsible for the storage and privacy of this information and takes precautions to prevent misuse of information. Access to personal information is limited to those with a legitimate need for such information in the performance of their work. Information about you will not be released outside ModusLink without your consent except for employment verification, professional resume, information on

employment duties and performance for reference checks and information that must be disclosed by law, court order or upon the request of an appropriate governmental authority.

No information is retained or disseminated which contravenes applicable local laws regarding employee information.

Managers are responsible for directing the actions of others and for setting an example for all employees. As such, they should be familiar with this Labor and Ethics Statement and how it applies to them and to those under their supervision. It should be remembered that no one has authority to require or influence another employee to violate this Labor and Ethics Statement, and any attempt to do so may result in immediate disciplinary action, up to and including termination of employment.