

Conflict of Interest Policy

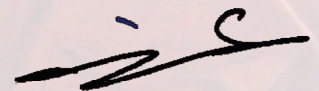
All OPT directors, officers and employees must avoid situations which involve, or could appear to involve, conflicts between their personal interests and the interests of OPT or of OPT customers. Any personal loans by OPT to directors or officers (or any family members) or any guarantees of obligations, are specifically prohibited. In addition, personal loans to other employees are prohibited, unless approved by the Board of Directors.

OPT employees are expected to put OPT business interests ahead of their own. Information about OPT business or prospective business must not be used for personal gain or to compete with OPT, directly or indirectly, in the purchase or sale of property or other interests.

OPT employees must not work for a competitor of OPT while at the same time working for OPT. In addition, OPT employees must not be directors, officers, agents, or consultants of companies competing against OPT.

Sometimes OPT employees and members of their immediate families have active interests in other businesses. Relationships between these businesses and OPT must be avoided, unless specifically approved by the Board of Directors. Finally, OPT property, such as equipment, financial assets or confidential information must be used only for proper OPT purposes.

Any violation of this Policy may subject the employee to disciplinary action.



John Zhijun Xiao

Chairman