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**ETHICAL BUSINESS PRACTICES POLICY**

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## INTRODUCTION

The purpose of this Ethical Business Practices Policy is to establish guidelines of ethical business conduct for The Hallstar Company and its affiliates (“Hallstar” or “we) and its employees.

Through this policy, Hallstar makes a commitment to act with integrity in the way we conduct our business. This commitment will be reflected in our interactions with our customers, suppliers, community, and with each other. This Policy applies to all Hallstar directors, officers, and employees.

One of the most important elements of this Policy is open and transparent communications. We should always behave in such a way that public scrutiny of our actions would be welcome.

We see no conflict between attention to profit and attention to ethics. We will prosper most in an environment that is fair, open, and governed by integrity. As we contribute to this environment, we will concurrently be contributing to the financial success of this company.

## COMPANY AND EMPLOYEE RESPONSIBILITIES

Hallstar, through its employees, has a responsibility to serve the interest of its customers and the community at large. The work Hallstar performs must be of high quality and sustainable. It must be expert and professional, clear and accurate, and environmentally sensitive. Our employees must serve our customers with diligence, creativity, and professional competence, while respecting our customer’s objectives, decisions, and confidentiality.

### **Hallstar will strive to meet its following responsibilities:**

- Provide fair and equitable treatment, opportunities for professional growth, and clear and accurate information to its employees to the extent possible.
- Recognize and reward excellence in job performance, identify and correct substandard or deficient performance of which it is aware, and provide the resources reasonably necessary to properly perform work assignments.
- Provide a positive and supportive work environment, free from any discrimination and -any form of harassment (such as sexual, verbal, physical, psychological, or other similar types of harassment).
- Protect its employees from health-related hazards in the workplace to the best of its ability.
- Not knowingly ask or require its employees to perform in dangerous or hazardous conditions for which employees are neither trained nor prepared.

### **Employees will strive to meet the following responsibilities:**

- Uphold and maintain applicable professional standards in the performance of their duties, which include compliance with applicable laws and regulations.
- Inform and be informed about the laws and regulations that are related to the chemical industry, including monitoring new legislative or regulatory changes.
- Perform their duties with diligence, productivity, competence, creativity, and integrity.

- Respect the confidentiality of information.
- Never act in a way that will discredit the company.
- Learn the details of all policies dealing with your work.
- Seek assistance from your manager when you have questions about application of these policies.
- Understand and keep up to date on the laws of the U.S. and other countries, agency regulations, and customer requirements related to your job.
- Promptly report, to your direct Manager, Human Resources Department or the Legal Department, any concern you may have about possible violations of any Hallstar policy, or any request made to you to violate a Hallstar policy.

## BUSINESS CONDUCT GUIDELINES

### Business Courtesies

Business courtesies furnished in connection with business discussions, or the development of business relationships are generally accepted as ordinary and necessary in the normal and efficient conduct of business. These may include business-related meals, refreshments before or after a business meeting, and occasional attendance at an athletic, theatrical, or cultural event.

Business courtesies in any form must be ethical and proper in all respects. They shall not be offered or accepted in any attempt to give, obtain or retain business, or secure an unfair advantage or in circumstances that could reflect negatively on Hallstar’s reputation.

Business courtesies may be offered or accepted provided the following conditions are met:

- The business courtesy does not violate any applicable law, rule, regulation, standards of conduct (“**Applicable Laws**”), or knowingly violate policies of the recipient’s employer or the organization the recipient represents including the Foreign Corrupt Practices Act.
- The business courtesy is modest—that is, not extravagant or lavish—and infrequent with respect to the same recipient.
- Any gift or gratuity that is considered improper or illegal under Applicable Law is strictly prohibited.

### Conflicts of Interest

Hallstar prohibits its employees from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interest of Hallstar, its customers, suppliers, or vendors. This includes any contractual relationship with a third party that could lead to a conflict of interest. It is essential for employees who are confronted with possible conflict of interest to promptly and fully disclose details of the situation to their managers or the legal department. Employees must disclose any ownership in or financial interest they or their immediate families have in any firm which does business with Hallstar, or which competes with Hallstar. Hallstar may require divestiture of such interest if it conflicts with the best interest of Hallstar.

## **Confidentiality & Data Security**

Employees will safeguard Hallstar's confidential information concerning transactions, both financial and technical. Information should be shared only with those who have a need to know. Confidential information obtained through employment with Hallstar shall not be used for the furthering of any private interest, personal gain, or third-party benefit. Customer-related information will not be released without the consent of the customer, or pursuant to a properly issued subpoena, or court order. Electronic data collected from third parties will be stored internally on secured servers and shared only with those that need to know. Company networks have security controls and access restrictions which is managed by the Information Technology (IT) Department.

## **Competitor Intelligence**

In striving for continuous improvement, it is important to know how Hallstar measures up against its competitors. Care and prudence must be exercised in the gathering and use of all such information. Using public or confidential information to discredit a competitor is prohibited.

## **Company Funds, Resources, & Accounting**

Employees shall use Hallstar funds and resources only for company-sanctioned activities. The use of funds or resources for any illegal or unethical purposes is strictly prohibited. Employees are responsible for accurately reporting time worked and expenses incurred to facilitate proper accounting. All meals, entertainment and expenses must be pursuant to Hallstar policy and supported by accurate and sufficient records.

All funds and assets of Hallstar shall be properly recorded and maintained. Only true and accurate entries shall be made in the books and records of Hallstar and such entries shall fairly represent transactions and disposition of Hallstar's assets in reasonable detail. Payments made on behalf of Hallstar shall be used only for stated purposes.

## **Information Technology and Software Use**

Hallstar policy prohibits illegal use of any software. Only company-owned or authorized software shall be installed on Hallstar computers or used by employees. Hallstar has established additional specific policy(ies) related to the proper use of information technology.

## **Truth in Advertising, Communications & Proposals**

Hallstar and its employees shall accurately represent Hallstar's capabilities, qualifications, and resources in all forms of advertising, communications, and proposals.

## **ALCOHOL AND SUBSTANCE ABUSE**

Hallstar has a substance abuse policy that Hallstar employees are subject to and subsumed within this policy.

**ANTI-BRIBERY / FOREIGN CORRUPT PRACTICES ACT COMPLIANCE**

Hallstar and its employees commit to the following:

- Never offer anyone or give anyone a bribe, kickback, illegal political contribution, or other improper payment. Use good judgment to avoid even the appearance of an improper payment. Make sure business entertainment is lawful, reasonable, and permitted by the procedures of Hallstar, and its customers and suppliers. Follow the laws of the United States and other countries as they relate to these matters.
- Never offer or provide anything of value to a customer or government official to influence or reward an action. Never offer a business gift or entertainment if it would create the appearance of impropriety.
- This policy also prohibits unlawful political contributions. When hiring persons or firms that represent Hallstar, make sure they are reputable and qualified. Don't let any transaction go forward if an integrity concern is unresolved.
- Never make or offer, directly, or indirectly, a payment of anything of value (such as a bribe or kickback) to any political party, party official, or any candidate for political office in any country, to influence or reward any government act or decision.
- Gifts and entertainment to officials, and employees of the governments of the U.S., and other countries are highly regulated and often prohibited.

<b><i>What is considered a bribe under Anti-Corruption laws?</i></b>	<b><i>Who is a "government official" under Anti-Corruption laws?</i></b>
<p>Anything of value that could be seen as an attempt to influence a government official's actions or decisions, obtain or retain business or acquire any sort of improper advantage, such as:</p> <ul style="list-style-type: none"> <li>• Money or cash equivalent (e.g. gift certificates, equity, bonds, etc.)</li> <li>• Free goods or services</li> <li>• Gifts</li> <li>• Meals</li> <li>• Entertainment</li> <li>• Travel</li> <li>• Job offers</li> <li>• Donations to charities suggested by the official</li> <li>• Campaign contributions</li> </ul>	<p>The concept of a Government Official is broadly construed under these laws, including:</p> <ul style="list-style-type: none"> <li>• Elected or appointed government officials, including former officials, and those waiting to assume office</li> <li>• National, state, or local government employees</li> <li>• Political candidates</li> <li>• Political parties, and their officials</li> <li>• Employees of businesses that are owned or partially owned by a foreign government</li> <li>• Employees of international organizations such as UN, WHO, IMF, Red Cross, etc.</li> <li>• Family members of any of the above</li> </ul>

## ANTI-MONEY LAUNDERING

Hallstar is committed to complying with all applicable anti-money laundering laws, rules, and regulations. Money-laundering is broadly defined as engaging in a transaction with criminally derived property, structuring a transaction to avoid detection of criminal conduct, or engaging in a transaction in furtherance of criminal conduct. To avoid any connection with money laundering, we all need to do our part to ensure we only conduct business with reputable vendors, suppliers, contractors, customers, and clients. We are committed to keeping our Anti-Money Laundering policy current. We are also committed to implementing and maintaining procedures to detect and report possible money laundering and suspicious activity, and that all required governmental and regulatory filings are completed accurately and submitted timely.

## ANTITRUST LAWS COMPLIANCE

The antitrust laws of the United States and the competition laws of other countries are a critical part of the business environment in which Hallstar operates. Although this Policy requires adherence to all Applicable Laws, compliance with antitrust law is critically important to the day-to-day conduct of Hallstar's business of setting prices and other aspects of purchasing, selling, and marketing goods and services.

Hallstar is dedicated to compliance with antitrust laws in all its activities. Every Hallstar employee is responsible for compliance with the antitrust laws, as well as for promptly reporting any possible violations of those laws to senior management.

### **Hallstar and its employees must:**

- Comply with all applicable antitrust laws, including federal and state antitrust laws of the U.S., and the competition laws of other countries where Hallstar does business.
- Comply with all antitrust decrees and orders affecting Hallstar and its employees. Antitrust decrees and orders may prohibit some conduct otherwise lawful under the antitrust laws.
- Understand the basic requirements of the antitrust laws, decrees, and orders that apply to your business activities.
- Do not propose or enter into any agreements or understandings—expressed or implied, formal or informal, written or oral—with any competitor regarding the following aspects of the competition between Hallstar and the competitor for sales to third parties: Prices, Terms or conditions of sale, costs, Profits or profit margins, Product or service offerings, Production or sales volume, Production capacity, Market share, decision to quote or not to quote, customer or supplier classification or selection, sales territories, or distribution methods
- Even when there are appropriate reasons for communications between competitors (such as customer or supplier issues arising from a genuine buyer seller relationship, or the exploration of a joint venture), meetings and discussions between competitors present potential legal risks. Avoid creating the appearance of improper agreements or understanding by keeping communications with competitors to a minimum and making sure that there is a legitimate business reason for all such communications. Consult with company legal counsel regarding the steps you should take to minimize potential risks posed by communications with competitors. Each department shall adopt procedures for reporting and documenting



- competitor contacts. You are responsible for complying with your department's procedures.
- Do not propose or enter into any agreement or understanding with customers that restricts the price at which the customer may resell or lease any Hallstar product or service.
  - Comply with your department's guidelines for participation in trade associations, professional societies, and standards development, and product certification organizations.
  - Consult with Hallstar's legal department before entering:
    - Any agreement or understanding with a customer or supplier that requires it to conduct business with Hallstar before Hallstar will buy from or sell to it.
    - Any agreement or understanding with a customer to restrict the customer's choices in using or reselling a Hallstar product or service.
    - Any agreement or understanding with a customer which requires the customer to purchase one Hallstar product or service as a condition of purchasing another Hallstar product of service.
    - Any agreement or understanding which restricts any party's freedom to manufacture product, provide any service, or conduct business with another party.
    - Any acquisition, divestiture, or joint venture agreement.
    - Any patent, copyright, or proprietary know-how licensing arrangement that restricts the freedom of the licensee or licensor.
  - Consult with Hallstar's legal department before offering a customer a special price, promotional allowance, or service that is not offered for the same product to all competing customers.

## **CHILD LABOR AND FORCED LABOR**

We do not employ any person below the local minimum age for employment or the age of 15, whichever is higher. In accordance with the International Labour Organization (ILO) Minimum Age Conventions, Hallstar will not tolerate the use of child labor in any of its global operations and facilities. We will not tolerate the exploitation of children, their engagement in unacceptably hazardous work, or the physical punishment, abuse, or involuntary servitude of any worker. Employees/workers younger than 18 shall not perform hazardous work, or work with heavy or high-risk machinery. For purposes of this practice, a "child" is anyone who is less than 15 years of age or who is under the locally legal age to work, whichever is highest.

We believe that forced labor in any of its forms has no place in our operations or supply chains. We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and form of human trafficking.

We expect our suppliers and contractors with whom we do business to uphold the same standards. Should a violation of our practice become known to Hallstar and not be corrected, Hallstar shall discontinue the business relationship.

## **COMPANY ASSETS**

All employees have the responsibility to care for all Hallstar's assets, including products, supplies, facilities, and the services of other Hallstar employees. If you have concerns about employees not

protecting Hallstar's assets, you must report these concerns to your manager.

## COMPANY RECORDS

Whenever we are asked to create or maintain reports or records, we are also responsible for the integrity of those records. No employee should knowingly make any false or misleading entries in Hallstar books and records. All Hallstar financial reports, computer-based records, sales reports, expense accounts, time sheets, and other similar documents must be completed accurately, completely, and in accordance with Hallstar procedures, and legal requirements.

## DIVERSITY, EQUITY & INCLUSION / ANTI-DISCRIMINATION

Extend equal employment opportunity and fair treatment to all employees without regard to their race, color, religion, national origin, gender, age, disability, veteran status, marital status, sexual orientation, physical or mental conditions, political affiliation, union membership or other characteristics protected by law.

Use merit, qualifications, and other job-related criteria as sole basis for all employment-related decisions affecting employees.

Provide a work environment free of harassment based on diverse human characteristics and cultural backgrounds.

### **Hallstar and its employees must:**

- Any such harassment of employees by co-workers, supervisors, or managers will not be tolerated by Hallstar.
- Recruit, hire, train, compensate, promote, and provide other conditions of employment without regard to a person's race, color, religion, national origin, gender, age, disability, veteran status, marital status, sexual orientation, physical or mental conditions, or other characteristics protected by law.

## FIDUCIARY DUTIES AND FINANCIAL CONTROLS AND RECORDS

Hallstar is responsible for properly recording, preserving, and reporting financial information. Hallstar is required to maintain a system of internal accounting controls. Hallstar record-keeping and reporting must be consistent to provide a uniform basis for measuring, managing, and reporting company operations.

### **Hallstar and its employees must:**

- Follow generally accepted accounting principles, standards, laws, regulations, and Hallstar practices for accounting and financial reporting.
- Maintain complete and accurate records and accounts to reflect transactions and the disposition of assets.

- Be accurate, timely, and complete in preparing and maintaining records and reports required by management.
- Before signing a document, make a reasonable inquiry to make sure the information contained in it is accurate and complete.
- Before involving Hallstar in any transaction, or releasing any financial information, obtain all required management approvals, and adequately document them.
- Keep records secure, including computer-based information resources.
- Comply with applicable Hallstar record retention policies.
- Take prompt remedial action when required.
- Set up systems that:
  - Financial statements and reports present fairly the financial positions, the result of the operations, and/or other financial data in conformity with generally accepted accounting principles.
  - Transactions involving the company are appropriately authorized, and adequate records are maintained and appropriate reports are made with respect to such transactions.

## **FORMER EMPLOYEES**

Former employees working with vendors, consultants, or firms doing business with Hallstar must receive no special consideration. We must conduct business with former employees and their place of business on an “arm’s-length” basis, just as any other Hallstar vendor, consultant, or business partner.

## **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

We believe that the mutual success of Hallstar and its employees can best be achieved in a work environment where employees and their managers build trust through a direct relationship based on mutual respect and open two-way communication. We encourage all employees to share their ideas and work as a team to improve the workplace and business results. Hallstar respects its employees’ right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where our employees are represented by a legally recognized union or employee representative, we are committed to bargaining in good faith with such representatives.

## **GOVERNMENT AGENCIES**

Adhere to the highest standard of honesty and integrity in all contacts with government agencies. Always avoid even the appearance of improper conduct.

Make sure that reports, certifications, statements, proposals, and claims made to government agencies are truthful and accurate in collaboration with the legal department.

## HEALTH, SAFETY, ENVIRONMENTAL PROTECTION, & SUSTAINABILITY

Hallstar is committed to achieving environmental, health and safety, and sustainability excellence. Hallstar will strive to provide a healthy and safe working environment, and to avoid adverse impact and injury to the environment and the communities in which we do business. We are also committed to sustainability, and to conducting our business in a manner that respects the environment in full compliance with Applicable Laws with respect to the environment. We use energy wisely and efficiently, and employ technology to minimize any risk of environmental impact. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that Hallstar's business is conducted in compliance with all applicable laws, and in a way that is protective of the environment.

### **Hallstar and its employees must:**

- Comply with all applicable environmental, health, and safety laws, and regulations.
- Eliminate unreasonable risks for Hallstar facilities, products, services, and activities.
- Take appropriate measures to prevent workplace injuries and illnesses. Consider evolving industry practices, regulatory requirements and societal standards of care.
- To the greatest possible extent, reduce the use and release of toxic and hazardous materials.
- Follow this policy, and applicable laws and regulations to protect your own health and safety as well as that of other workers, the public, and the environment.

## INTERNATIONAL TRADE CONTROLS

All employees involved in international business must learn and follow the Applicable Laws that govern international trade.

### **Hallstar and its employees must:**

- Follow international trade control regulations, including licensing, shipping documentation, reporting, and record retention requirements. Avoid transactions prohibited by U.S. law or regulations.
- Implement programs to assure compliance with U.S. laws and regulations governing international transactions. This includes compliance with regulations prohibiting cooperation with boycotts against countries friendly to the U.S. and against "blacklisted" U.S. firms.
- Maintain a basic awareness of the laws and regulations governing them.
- Promptly report red flags or concerns about possible violation of this policy to Hallstar management.

## OUTSIDE EMPLOYMENT

No professional, supervising, or managerial employee may work for a Hallstar competitor, for vendors of other companies doing business with Hallstar or conduct work outside the company in a similar or same area that the employee holds within the company. Management employees should seek approval if they plan to work independently or to perform significant voluntary or charitable work that may affect their responsibilities at Hallstar.

## RETALIATION

Hallstar policy forbids retaliation against any employee for reporting a suspected violation by others. At the same time, employees who knowingly submit false reports will be subject to disciplinary action.

Each employee brings professional skills, personal values and good judgment to his/her job. When confronted in a difficult situation, asking the following questions is a good place to start:

- Is it legal?
- Is it consistent with Hallstar's values?
- What would customers, other employees and the public think?
- How will you feel about yourself?

## SUPPLIER RELATIONSHIPS / GIFTS

Supplier relationships at Hallstar are based on lawful, ethical, efficient, and fair practices. The quality of supplier relationships often has a direct bearing on the quality of our customer relationships.

### **Hallstar and its employees must:**

- Follow Applicable Laws for supplier relationships.
- Enlist supplier support in ensuring that Hallstar consistently meets and exceeds customer and supplier expectations of ethics, human rights, environmental awareness and protection, quality, cost, and delivery.
- Evaluate all supplier offerings based on objective factors including, but not limited to environmental, health and safety record, business ethics, protection of human rights, technical leadership, quality, reliability, service and price
- Follow the terms of supplier contracts, licensing agreements, and all Applicable Law, including those covering computer software.
- Do not participate for personal gain in any supplier's contest, game, or promotion, or accept gifts other than nominal value of "\$25 or less per annum."
- All gifts should be reported to your manager, and any non-perishable gift valued at over \$25 should be returned with a note explaining the Hallstar policy. Perishable gifts, such as food, or candy, should be donated to a charitable organization, or shared with other employees.
- Safeguard any information that Hallstar holds as confidential, either on its own, or by agreement with supplier, customer, or third party.

## SOCIAL RESPONSIBILITY

We seek to align our social and environmental efforts with our business goals and continue to develop metrics to assess our progress. We will continually challenge ourselves to define what being a responsible company means to us, and work to translate our definition into behavior and improvements at Hallstar.

## TRAVEL

All employees must travel in accordance with Hallstar policy and minimize travel costs.

## ADMINISTRATION OF ETHICAL BUSINESS PRACTICES POLICY

These policies on key integrity issues, implement Hallstar Ethical Business Practices as described in the previous sections. These policies apply to all employees of Hallstar.

Hallstar has a corporate level Investigation Review Team (“IRT”) composed of senior corporate executives. The IRT oversees the process for investigating reports of violations of company policies and practices.

Periodically, the IRT meets with management and other selected employees to review policy compliance issues. The IRT recommends actions necessary to resolve those issues, reporting as required to the CEO and the Board of Directors.

It is the responsibility of each manager to set up and maintain an effective compliance program to prevent and detect violations of Hallstar policies and applicable laws.

The manager should tailor the compliance program to the specific circumstances of his/her function. The compliance program should have the following elements:

- Set departmental standards and procedures that are reasonably capable of reducing the prospect of violations of Hallstar policies and applicable laws.
- Implement educational and training programs that will enable employees to understand the requirements of Hallstar policies and applicable laws.
- Establish and communicate a procedure for promptly reporting possible violations and concerns that protects against fear of retribution.
- Implement appropriate disciplinary mechanisms.
- Take remedial actions to correct weakness and prevent recurrence of failures.

### **Managers have additional obligations common to all policies. They must:**

- Lead by example, using their own behavior as a model for all employees.
- For each policy, identify those employees whose activities may involve issues covered by that policy.
- Make sure employees understand that performance is never more important than compliance.
- In evaluating and rewarding employees, consider their actions and judgments in promoting and complying with Hallstar policies.
- Promptly report employee concerns of possible policy violations.

**Employees must:**

- Learn the details of policies dealing with your work.
- Promptly report any concerns you may have about possible violations to a manager, or, if you prefer, to the Human Resources Department Manager. Your report may be written or oral, and it may be anonymous.

**REPORTING OBLIGATION**

Promptly report any concerns about violations, or possible violations of this policy to your Manager, Human Resources Department, or the Legal Department

**POLICY VIOLATIONS****Policy Violations**

Violations of this Policy may lead to disciplinary actions, including discharge, civil, or legal actions, or the reporting of alleged criminal activity to appropriate authorities. Employees are encouraged to report any suspected violations to their manager or the Human Resources Department Manager. Reports of alleged violations will be handled in absolute confidence without discrimination.

**Penalties for Violation**

Following the policies of Hallstar is a must. Employees who violate the spirit and letter of these policies are subject to disciplinary action up to and including discharge. The following are examples of conduct that may result in discipline:

- Actions that violate a Hallstar policy.
- Requesting others to violate a policy.
- Failure to promptly report a known or suspected policy violation.
- Failure to cooperate in Hallstar investigations of possible violations.
- Retribution against another employee for reporting a policy concern.
- Failure to demonstrate the leadership and diligence needed to ensure compliance with Hallstar policies, and applicable laws.

For many of the policies of Hallstar, a violation can also mean breaking the law, and subjecting yourself or the company to criminal penalties (fines or jail sentences), or civil sanctions (damage awards or fines).

**EMPLOYEE'S ACKNOWLEDGMENT**

I, the undersigned employee of Hallstar, hereby confirm and acknowledge that I have read and understood the Ethical Business Practices Policy, including all polices stated herein.

I agree to abide by the policies of Ethical Business Practices and understand that any violation of these policies may be grounds for discipline, up to and including termination.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_