



HPG Brands is a growing family of hard goods brands. Currently consisting of nine brands, every brand owns a top promotional product industry rating and has earned multiple awards for exceptional service and quality products. Our responsibility with regard to our customers, suppliers, employees, and shareholders, however, extends well beyond great service and quality products. We view our business as an eco-system that must be built, nurtured, and maintained in a socially, economically and environmentally responsible manner.

With suppliers, customers and employees stretching from Asia to North America, our network of relationships and responsibilities is both wide and deep. We are committed to partnering only with suppliers who share our values and who employ business practices that comply with and support the obligations set forth in our Code of Conduct Handbook. For the purposes of this document and further communication, we define “suppliers” as all suppliers, including subcontractors and factories that our suppliers may use for any goods and services.

We employ a committed team of leaders and professionals to monitor, audit and ensure that our employees and the employees of our supplier partners operate in safe, healthy environments that produce and decorate products that meet both statutory and voluntary compliance standards of safety, utility and performance. Embracing our social, economic and environmental obligations, we combine supplier site visits by our senior leaders and our sourcing professionals, with visits by independent auditors and testers to ensure compliance and facilitate CAPA (Corrective Action Preventive Action) reports that drive changes necessary to enhance or maintain adherence to continuously updated standards of conduct and performance.

Regulatory bodies provide a starting point from which we base and build our product and supply standards. Our Code of Conduct Handbook is integral to our Accountability Program and includes our commitment to socially, economically and environmentally responsible business practices as well as the associated documentation that leads to predictable, repeatable processes and results. Our aspirations extend beyond compliance to a business eco-system that lives its values and enhances the well-being of all our stakeholders.

Thank You,

Chris Anderson

CEO





Code of Conduct Handbook

1. Principles and Value

HPG's business practices have been governed by integrity, honesty, fair dealing and full compliance with all applicable laws. We upheld and lived this commitment in connection with all promotional product programs we operate for our customers. We expect that all Suppliers seeking to become approved suppliers of HPG Brands commit to meeting these standards in their own business as well as communicate and implement through their supply. When differences or conflicts in standards arise, the highest standard shall apply.

1.1. Child Labor

HPG Brands and its Suppliers shall not employ people under the age of 15, or the minimum age for the completion of compulsory education, or the minimum age of employment required by law in the country of manufacture, whichever is higher.

1.2. No Force Labor

HPG Brands and its Suppliers may not, under any circumstances, utilize slave labor, forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor.

1.3. Hours and Wages

HPG Brands and its Suppliers with whom we do business must comply with all applicable wage and hour laws, rules, and regulations including those related to overtime.

2. Transparency

HPG Brands and its Suppliers must provide transparency in their operations, policies, processes, and relevant records to clients or designated third party auditors. Upon request, suppliers must be willing to work with HPG Brands to disclose the identity, physical location, and ownership of factories that produce goods for HPG Brands, including the use of sub-contractors.

3. Conflict of Interest

3.1. Gift, Entertainment, and Other Business Courtesies

As a global company, we operate in many diverse environments, where certain activities are an expression of politeness or a reflection of societal and cultural practices. We respect cultural norms to the extent possible, but activities that are excessive or become a regular occurrence should be avoided. Customary activities include modest forms of hospitality, such as lunches or dinners and occasional gifts of minimal value, which do not influence business decisions are acceptable.





3.2. Personal investments, transactions, and outside business interests

Avoid providing service to a competitor, supplier, proposed supplier or customer as an employee or consultant. Avoid Activities that influence or appear to influence any business transaction between the Company and another entity in which an employee has a direct or indirect financial or personal interest.

4. Worker Treatment Rights

4.1. Workplace Conditions

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with or occurring in the course of work or as a result of operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment. Employers must meet all applicable environmental laws and regulations in their country with regard to hazardous materials and all waste and emissions materials.

4.2. No Discrimination

No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

4.3. Harassment or Abuse

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

4.4. Freedom of Association

The rights of employees to associate, organize or join a union without fear of reprisal or interference will be respected. If employees are represented by a union recognized under law, their right to bargain collectively will be recognized.

4.5. Grievance Procedures

Fair and reasonable grievance procedures will be established and followed without consequence to involved workers. Procedures will be documented and properly explained to employees upon being hired.

5. Workers' Hours and Compensation

5.1. Hours of Work

The regular work week shall not exceed 48 hours. Except in extraordinary business circumstances, employers shall not require workers to work more than 60 hours a week, or the maximum number of work hours per week permitted in the applicable country of manufacture, whichever is less. Workers must be allowed at least one uninterrupted, 24-hour rest period after every 6 consecutive days worked.



5.2. Regular and Overtime Wages

In addition to their compensation for regular hours of work, employers should compensate employees for overtime hours at the applicable premium rate required by law in their country. All overtime work should be consensual and should not be requested on a regular basis.

5.3. Compensation

Every worker shall have the right to compensation for a regular work week that is sufficient to meet the workers' basic needs and provide some discretionary income. Where this is not achieved each employer shall develop and implement steps to progressively realize a level of compensation that does. Employers shall pay at least the minimum wage, or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages and provide any fringe benefits required by law or contract.

6. Product Quality

6.1. Manufacturing Practices

HPG Brands and its Suppliers will have a Good Manufacturing Practices (GMP) program in place that they are willing to share and that addresses the following areas of quality and control:

- a) A documented protocol for validating production process prior to the commencement of manufacture, whether a new product or a new manufacturing facility
- b) A documented protocol for assuring and communicating continuous adherence to quality and performance standards related to the company's product line.

6.2. Inspection

HPG Brands and its Suppliers will have adequate, transparent, and documentable inspection processes that address preproduction, production and postproduction phases of manufacturing. Upon request, Supplier will allow inspection of products prior to shipment.

7. Product Safety

7.1. Restricted Substances List

All applicable industry standards for products' safety will be followed. Materials will be reviewed and tested as appropriate to ensure use of restricted substances is minimized, eliminated, or, when necessary, fully disclosed. A copy of an industry recognized list of restricted substances will be provided by HPG Brands upon request.

7.2. Product Testing





Testing specifications for product categories are documented and in place with applicable test results available upon request. If no current tests are available, HPG Brands or its Supplier will be prepared to test an item to applicable US and Canada laws and standards.

8. Environmental Compliance

8.1. Worker health and safety

HPG Brands and its Suppliers must provide a safe and healthy work environment consistent with international standards and applicable local laws. OSHA regulation compliant or international equivalent is followed in environmental policy, procedures, and protocols.

8.2. Manufacturing Processes

All applicable environmental laws and regulations will be followed. The environmental footprint (i.e., energy, water, and waste systems) related to manufacturing activities will be considered and managed to minimize the adverse impact on the environment.

8.3. Materials Handling

A documented protocol and process for the handling and control of hazardous substances is in place. First aid procedures and handling instructions will be visibly placed near storage or use of hazardous substances.

9. Commitment to Continuous Improvement

HPG Brands and its Suppliers are expected to demonstrate a commitment to continuous improvement in the areas of social and environmental accountability, product quality and safety, security of goods, and compliance with applicable regulatory laws.

