



Statement from the CEO

HPG is a growing family of hard goods suppliers primarily serving the North American Promotional Products Market. Currently consisting of eleven brands, every brand has a top industry rating and has earned multiple awards for exceptional service and quality products.

HPG's responsibility to our customers, suppliers, employees, and shareholders 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. We are committed to maintaining the highest standards of integrity and ethical behavior in our interactions with employees, customers, shareholders, suppliers, and the broader community.

We employ a committed team of leaders and accredited global assurance providers to monitor, audit and ensure that our employees 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 recognizing that ethical considerations are fundamental to sustainable and long-term business success, this handbook is designed to foster a positive and ethical work environment, cultivate integrity, and trust, and preserve our reputation as a responsible corporation.

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 enterprise ESG Policy 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.

HPG's business practices are governed by integrity, honesty, fair trade, and full compliance with all applicable laws. We uphold and live this commitment in connection with all products and service programs we operate for our customers.

Want to learn more? HPG's dedicated Sustainability team may be reached directly at sustainability@hpgbrands.com.

Thank You,

Chris Anderson

CEO



Code Of Conduct Handbook

1. Principles and Value

1.1. Honest and Ethical Business Conduct

HPG's business practices have been governed by integrity, honesty, fair dealing, and full compliance with all applicable laws. We uphold and live this commitment in connection with all promotional product programs we operate for our customers.

1.2. Relationship with Stakeholders

It is a core responsibility of HPG to create an authentic partnership with our clients and employees to make the lives of those around us better; engage people in spirit as well as deed in pursuit of success anchored by integrity, dependability, speed, quality, value innovation, and a passion for heroic service.

1.3. Respect for Human Rights

HPG believes that all human beings should be treated with dignity and respect. HPG is committed to upholding the internationally recognized human rights of all people.

2. Fair Labor and Compensation

2.1. No Forced Labor / No Child Labor

HPG will not, under any circumstances, utilize slave labor, forced labor, including prison labor, indentured labor, bonded labor, or other forms of forced labor.

HPG will 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.

2.2. Hours of Work

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

2.3. Regular and Overtime Wages

In addition to regular hours of work, employees will be compensated for overtime hours at the applicable premium rate as legally required. All overtime work should be consensual and should not be requested on a regular basis.

2.4. Compensation

Employees shall have the right to compensation for a regular work week that is sufficient to meet the basic needs and provide some discretionary income. Where this is not achieved, HPG shall develop and implement steps to progressively realize a level of compensation that does. HPG 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.





3. Worker Treatment Rights

3.1. Non-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.

3.2. 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.

3.3. 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. Health, Safety & Environmental Compliance

4.1. Worker Health and Safety

HPG will 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.

4.2. Environmental Conservation

HPG is committed to the creation of a more sustainable society by achieving a zero environmental footprint throughout the lifecycle of our products and business activities. 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.

5. Protection of Intellectual Assets

5.1. Confidential Information

Employees will safeguard HPG confidentiality or proprietary information as well as information that our suppliers, business partners, or customers entrust to HPG. Employees will not disclose or distribute any confidential or proprietary information except as authorized by the company.

5.2. Information Security

HPG recognizes the importance of information security both in archiving financial success and maintaining the trust of our stakeholders and has established information security policies compliant to ISO 27001 to help protect our information resource and system.

6. Fair Business Practices

6.1. Product and Service Safety and Accessibility

HPG strives to follow the Good Manufacturing Practices (GMP) system that meets or exceeds legal requirements to help ensure the safety and quality of our products and services. Should an incident or safety problem be reported, HPG will promptly investigate the matter and take appropriate action.





6.2. Fair Procurement

HPG select its suppliers on the basis of competitive price, quality, delivery and other objective standards. HPG expects its suppliers to adhere to HPG's ethical standards and comply with applicable laws, respect for human rights, fair labor and employment practices, environmental conservation and the safety of products and services.

6.3. Anti-Corruption

HPG prohibits corrupt practices in any form, including bribery, kickbacks, and other unlawful payments, in both the public (government) and the private (commercial) sections.

7. Ethical Personal Conduct

7.1. Gift, Entertainment, and Other Business Courtesies

As a global company, HPG respects cultural norms to the extent possible, but activities that are excessive or become a regular occurrence should be avoided. Never accept "gifts" that are in the form of cash or designed/perceived to influence in the performance of work duties.

7.2. Personal Conflict of Interests

Avoid providing services to a competitor, supplier or customer as an employee or consultant. Avoid activities that influence or appear to influence any business between HPG and another entity in which an employee has a direct or indirect financial or personal interest.

8. Responsibilities of Everyone

8.1. Reporting Concern and Hotline

HPG's Ethics and Compliance Portal is available to all employees, customers, and suppliers as a resource to report concerns or seek guidance about possible violation or law or HPG polices. The hotline is maintained by an independent third party and is always accessible, day or night, via telephone or internet.

8.2. No-Retaliation

HPG does not allow any form of retaliation against anyone making a good faith report or for participating in an investigation of a report. Anyone who makes a good faith report will be treated fairly and respectfully.

8.3. Commitment to Continuous Improvement

HPG is 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.

