

# HALO Branded Solutions, Inc. Business Ethics Policy Statement

HALO Branded Solutions (HALO) upholds the highest standards of ethical conduct and integrity. We understand and take seriously our responsibility to raise compliance and ethical standards throughout our business operations. Our commitment extends to compliance with international norms, legal requirements, and industry best practices.

This policy applies to all HALO employees, contractors, suppliers, and partners involved in HALO's business operations globally. It pertains to all aspects of our business, including interactions with clients, competitors, and the public. Additionally, we engage stakeholders, clients, employees, and suppliers to ensure their perspectives are considered in shaping our ethical practices. To the extent this policy conflicts with HALO's Employee Handbook or Sales Policy Manual, the Employee Handbook and/or Sales Policy Manual shall control.

We comply with all applicable laws, regulations, and industry codes related to business ethics including anti-corruption, data protection, and intellectual property. HALO is proud to align our initiatives, processes, and policies with international standards.

We are a proud member of the Fair Labor Association (FLA), a multi-stakeholder initiative committed to promoting fair labor practices globally. Our participation in the FLA ensures that we identify and resolve labor issues, protect workers' rights, and create systems that prevent labor standard violations within our supply chain.

We also actively support the United Nations Global Compact (UNGC) by aligning our strategies and operations with the Ten Principles related to human rights, labor, environment, and anti-corruption as well as contributing to sustainable development goals geared toward creating a better world.

HALO actively implements ethical conduct throughout our organization through individual awareness and accountability, reporting, and periodic reviews.

- **Training and Awareness:** We provide regular training to employees on ethical behavior, legal compliance, and the importance of upholding our values.
- **Monitoring and Reporting:** Our established mechanisms for monitoring compliance and reporting any violations encourage all employees to report concerns through confidential channels.
- **Review and Updates:** We review these policies periodically to ensure alignment with changing legal requirements and industry standards.

We respect the rights, dignity, and diversity of all individuals, both within and outside of HALO. All employees and stakeholders must act with honesty, transparency, and integrity in all business dealings. Our commitment to ethical conduct requires all individuals and organizations with whom we do business to adhere to clearly defined provisions that raise compliance and ethical standards for our business overall. By enhancing and adhering to this policy, we contribute to our collective success and uphold our reputation as a responsible and trustworthy organization.

- **Fair Competition:** We compete fairly, avoiding anti-competitive practices and collusion. HALO's employees and suppliers comply with applicable anti-trust and fair-dealing laws created to ensure a free and open marketplace. Our employees and partners must not propose or enter into any agreements with a competitor to influence clients, territories, markets, or to boycott a competitor or client.
- **Anti-Corruption and Money Laundering:** HALO maintains a Zero Tolerance Policy for any form of bribery or corruption. We require our company and partners to strictly comply with the anti-bribery laws of the United States as well as the foreign countries where HALO does business.
- **Financial Record Keeping:** We accurately keep our books, records, and accounts to fairly reflect all transactions and the disposition of assets. Employees must adhere to insider trading laws and protect non-public insider information. We also require suppliers to keep documentation that demonstrates compliance with all applicable laws, regulations, guidelines, industry codes, and HALO's high ethical standards.
- **Data Protection and Data Security:** HALO is ISO 27001/27701 certified. Globally recognized as the world's best-known standard for Information Security Management Systems (ISMS) and Privacy Information Management Systems (PIMS), these certifications guide us in building, maintaining, and continuously improving our ISMS to protect sensitive data and ensure cybersecurity.
- **Confidentiality and Information Disclosure:** Confidential information, including client data, must be safeguarded and not disclosed without proper authorization. Our employees and suppliers have a duty to protect HALO's confidential and proprietary information as well as client information that is provided or disclosed by HALO. We comply with all applicable laws and regulations governing the protection, use, and disclosure of proprietary, confidential, and personal information.
- **Conflicts of Interest:** HALO is committed to avoiding any situation or relationship that creates (or appears to create) a potential conflict of interest for any involved party. Any real or potential conflicts of interest must be disclosed immediately and HALO will determine the appropriate course of action.

- **Intellectual Property:** Respect for third-party intellectual property rights is essential. Given the nature of our business, HALO frequently has access to the intellectual property of third parties, including that of clients. Our employees and suppliers are strictly prohibited from using intellectual property without proper authorization.
- **Whistleblower Protection:** HALO employees and partners who report violations in good faith are afforded confidentiality and are protected from retaliation. Whistleblowing channels are clearly outlined in our Employee Handbook, Code of Conduct, and Supplier Code of Conduct.

For more details, please refer to HALO's Ethics and Compliance Program.