

The Better Impressions People™

HUBpromotional
group

CODE OF CONDUCT

HUB Promotional Group (HUB) 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 of our stakeholders.

Thank you,

Joseph Fleming
President and CEO

HUBPEN™

Beacon*



COOLER
GRAPHICS

ebco

BCG

Origaudio

HandStands.*

Code of Conduct Handbook

1. Zero Tolerance Standards

Zero Tolerance Standards are the cornerstones of our Accountability Program (AP). We strive to achieve these standards in connection with all promotional product programs we operate for our customers. We require that all suppliers seeking to become approved suppliers of HUB Promotional Group commit to compliance with the standards articulated in the International Labor Organization's "Declaration on Fundamental Principles and Rights at Work" and the Fair Labor Association's (FLA) "Principles of Fair Labor and Responsible Sourcing" and FLA's Workplace Code of Conduct

1.1. Child Labor

HUB Promotional Group and its Suppliers must observe all legal requirements and local laws regarding the work of authorized minors, including, but not limited to, those pertaining to hours of work, wages, age, minimum education, and working conditions.

1.2. No Forced Labor

HUB Promotional Group and its Suppliers may not, under any circumstances, utilize slave labor, exploited bonded labor, indentured labor, or involuntary convict labor.

1.3. Hours and Wages

HUB Promotional Group 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.

1.4. Physical or Sexual Abuse and Sexual Harassment

HUB Promotional Group will not utilize Suppliers who subject workers to physical, sexual, or psychological harassment or abuse.

1.5. Access

Pending an order of significant size, HUB Promotional Group and its Suppliers must allow inspection of their records and facilities including confidential employee interviews by clients of HUB Promotional Group or third party auditors to verify compliance with our standards.

1.6. Commitment to Continuous Improvement

HUB Promotional Group 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.

2. Transparency

HUB Promotional Group and its Suppliers must provide transparency in their operations, policies, processes, and relevant records to clients or their designated third parties. For specified orders, suppliers must be willing to work with HUB Promotional Group to disclose the identity, physical location, and ownership of factories that produce goods for HUB Promotional Group, 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 decision

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

All applicable laws and regulations for safety and health will be followed. Proper sanitation, lighting, ventilation, and fire safety protection must be provided. OSHA or other relevant international standards must be followed.

4.2. No Discrimination

No discrimination in hiring and employment practices on the basis of age, nationality, race, religion, social, sexual or ethnic orientation, gender, or disability will be permitted.

4.3. Freedom of Association

The rights of employees to associate or 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.

4.4. Subcontractors and Sources

All businesses that support our business as subcontractors, manufacturers or sources of goods will comply with the expectations defined in the HUB Promotional Group Code of Conduct Handbook. All subcontractors and suppliers will comply with all applicable laws and regulations. We expect businesses to develop and implement internal business procedures to ensure compliance with HUB Promotional Group policies and standards.

4.5. Discipline and Termination

Monetary fines, physical, sexual, or verbal harassment or abuse will not be employed to discipline employees. Applicable laws and regulations regarding employee termination will be followed.

4.6. Employment Policy

Applicable employment laws and regulations will be followed, made available, communicated, and posted in a formal fashion to employees. In the absence of laws or regulations in a particular location relating to safety, labor, employment, environment, or working conditions, the spirit and intent of these policies shall be met.

4.7. 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. Regular and Overtime Wages

Regular and overtime wages will meet local minimum wage requirements and be paid on a regular and scheduled basis. Exceptions to overtime and similar wage laws permitted by local authorities shall be clearly documented and communicated to employees. No disciplinary deductions shall be permitted.

5.2. Benefits

At a minimum, benefits will be provided per local law or regulation without disproportionate payroll deductions.

5.3. Payroll Practices

Payroll practices will include worker access to their complete personal earnings records, kept according to generally accepted accounting principles. The practice of "double books" is not acceptable.

5.4. Working Hours

Workers must not work more hours in one week than allowable under applicable laws. Workers must be allowed at least one uninterrupted, 24-hour rest period after every 6 consecutive days worked.

5.5. Employee Education

Employees will be educated to have a clear understanding of how regular and overtime rates are accrued and paid, and how benefits are administered.

6. Product Quality

6.1. Manufacturing Practices

HUB Promotional Group 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
- c) A documented protocol for validating conformance of finished product with approved product
- d) A documented supplier selection program
- e) Quality compliance-related accountabilities assigned to a senior position

6.2. Inspection

HUB Promotional Group and its Suppliers will have adequate, transparent, and documentable inspection processes that address preproduction, production and postproduction phases of manufacturing.

7. Product Safety

7.1. Safety Regulations

All applicable U.S. laws and regulations regarding safety of products will be followed. All applicable material and well-recognized voluntary industry standards for products and processes will be followed.

7.2. Process Management

HUB Promotional Group and its Supplier will have documented process management in place to ensure product safety.

7.3. Product Design

Safety hazards shall be considered in preproduction and approval phases to eliminate potential design-based risks.

7.4. Restricted Substances

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 HUB Promotional Group upon request.

7.5. Product Regulatory Compliance

Goods are being produced and checked for quality in conjunction with a compliance checklist.

7.6. Product Testing

Category testing specifications are documented and in place with applicable test results available upon request. If no current tests are available, HUB Promotional Group or its Supplier will be prepared to test an item to applicable U.S. laws and standards. HUB Promotional Group and its Suppliers will have a documented production testing plan to ensure that no material or structural changes takes place within the production run.

7.7. Recall Process

A product recall process is in place and is documented.

8. Supply Chain Security

8.1. Personnel Security

A process and procedure will be in place and documented to ensure the workforce is properly and legally identified.

8.2. Access Control

Process, procedures, and proper personnel will be in place to monitor and ensure only approved personnel and guests are allowed entry and exit to the facility.

8.3. Information Technology Security

Process and procedures will be in place and documented for securing electronic communications and data transmission.

8.4. Cargo Security

HUB Promotional Group and its Suppliers must certify that their facilities are secure. We expect each Supplier to review and follow the U.S. Government's published Manufacturer Security Recommendations or comparable international standard.

9. Environmental Compliance

9.1. Worker health and safety

HUB Promotional Group and its Suppliers must provide a safe and healthy work environment consistent with international standards and local law. OSHA regulation compliant or international equivalent is followed in environmental policy, procedures, and protocols.

9.2. 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.

9.3. 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.