

HILO HUMAN RESOURCES POLICIES AND PROCEDURES POLICY NO. 2.00 CODE OF CONDUCT

Last Modified: May 2020 Page 1 of 2

PURPOSE:

Hilo's core values include Teamwork, Performance and Integrity. The Company strives to create and maintain a positive work environment with dignity and respect. To achieve this, the Company encourages a commitment to courteous and respectful behavior, a responsible attitude toward work, a respect for employees, customers, and company property.

SCOPE:

All employees.

POLICY:

Employees are expected to conduct themselves with respect and decorum with regard to their colleagues, customers, and vendors. Inappropriate behaviors toward another employee, contractor, temporary, customer or other in the workplace are grounds for disciplinary action or up to and including termination of employment.

Noted here are some general areas of awareness for employees. This list is not exhaustive of all possibilities, but rather intended to provide some helpful illustrations of what is intended by this Code of Conduct.

1) Employees are expected to follow the company's ethical policies and standards. The following are examples of inappropriate behavior.

- Accepting bribes or kickbacks from coworkers or vendors.
- Insider trading.
- Reporting inaccurate material financial information.

2) Employees are expected to respect the individual rights and privacy of others. The following are examples of inappropriate or offensive behavior:

- Threatening, fighting with or physically abusing others.
- Discriminating against or harassing others on the basis of race, gender, age, religion, sexual orientation, ethnic background, marital, handicap, veteran status or any other legally protected status.
- Behaving in a manner that disrupts or interferes with the work of other employees.

3) Employees are expected to respect the property of others. The following are examples of inappropriate behavior:

- Using company equipment or property for personal use or without authorization.
- Misusing, mismanaging/misappropriating company assets or stealing from the company, its employees, vendors or customers.
- Destroying, defacing or damaging property belonging to Hilo, its customers, vendors or employees.
- Helping anyone gain unauthorized entrance to, or exit from, company facilities.
- Using telephone or computer excessively for personal business without consent of the company.

4) Employees are expected to treat Company information and property appropriately. The following are examples of inappropriate behavior:

- Misrepresenting or intentionally omitting facts to obtain employment or falsifying employment, medical or security records.
- Disclosing any company confidential information or material to any unauthorized person.
- Falsifying any company record or report.
- Accessing computer systems or giving information to others to access computer files or systems when not properly authorized.
- Accessing, storing or sending unethical or unprofessional images or text using a Company computer or email account.

5) Employees are expected to help maintain a safe work environment. The following are examples of inappropriate behavior:

- Violation of a safety, health or environmental policy or practice
- Working under the influence of, possessing, or using alcohol, other intoxicants or illegal drugs on company or customer premises.
- Participating in any form of illegal gaming or gambling on company or customer property.
- Possessing or using on company or customer premises any weapons, firearms or explosive devices.

6) All employees must, within their sphere of influence, ensure that Hilo complies with all applicable legal requirements in the conduct of its business; and employees may not condone the failure to comply by other employees. Employees whose job duties specifically include the implementation of legal compliance systems, and all managers in managing their businesses, have a responsibility to ensure that any allegations, or evidence of illegality in the conduct of Hilo's business, is either responded to in an appropriate manner by investigation and remedial action, or is reported to another employee with the responsibility to do so.

All employees should report any evidence of such illegality to management. Any retaliatory behavior against the employee communicating such evidence will be addressed through the disciplinary process up to and including termination.