



CODE OF CONDUCT

Why do we need a Code of Conduct?

Whatever change may be going on in the world around us, one thing remains unchanged: Hawkeye Industries' commitment to maintain the highest standards of business ethics and integrity.

Through its commitment to technology, Hawkeye can make a significant contribution to businesses and communities throughout its sphere of influence. However, it is not only what we do, but how we do it which will determine our reputation with our stakeholders and help ensure our continued success.

Our reputation is one of Hawkeye's most valuable assets. Like any asset, it must be developed, maintained, and protected.

Our Code of Conduct is central to the way we develop, maintain, and protect our reputation. It is built on our fundamental business principles of *Resiliency*, *Responsibility*, and *Respect* (3- R's) and describes how we are to behave, not just in general terms, but when faced with a range of situations where our actions could have a critical impact on the reputation of Hawkeye Industries.

The Code goes beyond compliance with the laws and regulations wherever we run our business. It demonstrates our commitment to acting ethically and with integrity in every situation, while at the same time respecting people's rights as individuals. We expect this of every single Hawkeye employee, in every location, every day. We also expect this of all our business partners. High standards in our relationships are the foundation for lasting success.

We want to be recognized as a world-class leader in everything we do, and we want all our stakeholders to be proud of their association with Hawkeye.

I urge you to read the Code thoroughly and play your part in turning into action the high standards of conduct which all our stakeholders expect of Hawkeye Industries, Inc.

Finally, if you are unsure about how to behave in any specific situation, please do not hesitate to speak to your management, HR, or local compliance officer for support and guidance.

Thank you for your personal contribution to Hawkeye's overall commitment to excellence and integrity in everything we do.

Bryan Hawkins
President / CEO
Hawkeye Industries, Inc.



Resiliency

We show resiliency when we help our customers to succeed...

The success of our customers is vital to Hawkeye's staying power and success. Customers look to Hawkeye for consistent innovation, reliability, and integrity. The standards of behavior required in our client relationships are designed to ensure that we consistently deliver those values and avoid mistakes that will harm our reputation.

We focus on quality –

We strive to help our customers gain competitive advantage by adding value through the competitive application, performance, and quality of our core technologies and services.

We win trust by being honest –

Trust is built through transparency and honesty. To be successful on a sustainable basis, we have to build each customer's trust through the integrity of our words and actions. We don't promise what we can't deliver and strive to ensure that customers, suppliers, and colleagues trust us to keep our word.

We compete fairly –

We believe in a competitive, free enterprise system, because it guarantees that our hard work and innovation will be rewarded. We will lose the trust of our customers if we treat them differently from one another or conspire with others against them.

This system, as the basis of a free market economy, is protected and promoted by competition law. Consequently, our actions must always comply with all applicable antitrust and other laws regulating competition. While these laws may vary from location to location, the Hawkeye Industries, minimum standard can be defined as follows:

- We compete openly and independently in every market. We do not make any agreements – formal or otherwise – with competitors to fix or set prices or allocate products, markets, territories or customers.
- We do not obtain from or share with competitors any current or future information about price, profit margins or costs, bids, market share, distribution practices, terms of sales, specific customers, or vendors.
- We do not agree with or require a customer to resell our products at certain prices.
- We do not act in a manner that unfairly favors or benefits one customer over another competing customer.

As an employee of Hawkeye, be mindful of the antitrust risks presented by trade and professional association meetings. Accordingly, each employee is required to:

- Attend only meetings of legitimate trade and professional associations held for proper business, scientific, or professional purposes.
- Discuss any questionable agenda items with your supervisor, staff manager, or business owner before you attend the meeting.
- Leave the meeting and promptly advise your supervisor, staff manager, or business owner if you observe any activity at an association meeting that appears to be illegal or suspicious.

If you have any questions regarding compliance with antitrust laws, contact a Hawkeye business owner or designated company compliance representative.

We refuse to make improper payments –



Hawkeye's reputation for honesty and integrity would surely be put at risk by the offer of improper payments. In dealing with public officials, political parties or their officials, or any private sector worker, Hawkeye employees must neither offer, promise, or give any undue financial or other advantage, whether directly or through intermediaries, to obtain or retain business or any improper advantage in the conduct of business.

We protect our credibility by shunning gifts and favors –

Accepting gifts and entertainment from business partners or offering such favors undermine our credibility. It makes Hawkeye vulnerable to accusations that business decisions are influenced by factors other than merit.

Employees must therefore not offer, make, seek or accept gifts, payment, entertainment or services to actual or potential business partners which might reasonably be believed to influence business transactions which are not within the bounds of customary business hospitality or which are prohibited by applicable law.



Responsibility

We show responsibility when we safeguard the company's assets...

We are all part of the Hawkeye team. Show respect and support for your colleagues and their aspirations by caring for the environment you and they work in as well as the information systems, equipment, and other facilities needed for each of us to do the best possible job. Helping each other to succeed also hinges on how we handle positions of authority, access to privileged information, and potential conflicts in interest.

We are respectful of the company's assets –

Hawkeye Industries strives to give employees the tools they need – equipment and information – to be effective. Hawkeye's physical assets, intellectual property rights, and information must be handled with care to avoid loss, theft, or damage. Information assets include organizational charts, technologies and processes, manufacturing methods, as well as marketing, advertising, financial, and business development studies and plans.

Company assets are intended to be used for business purposes. Limited personal use is only permissible if it is not in conflict with the interests of Hawkeye Industries, this Code of Conduct, or Hawkeye's rules and policies.

We use information systems professionally -

Hawkeye's information systems are there to help us work efficiently and professionally. Generally, such systems should be used only for business purposes, in a manner that does not violate the rights or interests of the company or its stakeholders.

Remember that any communication via e-mail could be regarded as a statement of Hawkeye Industries. Therefore, employees must be careful not to release information that is commercially sensitive or contentious, or may have undesired contractual or other legal implications for Hawkeye.

All laws governing copyright, defamation, discrimination and other forms of written communication also apply to online and e-mail communication. Unauthorized or unlicensed software must not be placed onto Hawkeye information facilities.

Hawkeye's information systems facilities must not be used to attack the integrity of Hawkeye's or third party's networks or data. This includes origination or forwarding chain letters or unsolicited commercial e-mail (spam).

Information produced and/or stored on Hawkeye's information systems facilities is regarded as Hawkeye property and Hawkeye reserves the right to access all such information except where limited by law or agreement. Employees are responsible for keeping their electronic files and archives in an orderly manner.

We safeguard confidential information –

Information is an asset. We share some of it in press releases, product information, websites, and other public documents. Any other information that comes to employees in connection with their work, whatever the source, must be kept confidential to prevent others from copying our work, poaching our customers, or benefitting our competition. It may also include information that suppliers, customers, or partners may have entrusted to Hawkeye Industries, Inc.



Mark information appropriately, keep it secure and limit access to those who need to know in order to do their jobs. Avoid discussing information in areas where you may be overheard, such as airports, public transport, restaurants and bars, elevators, restrooms and cafeterias.

Information is so valuable that it may be appropriate to ask any outside party given access to confidential information a sign an approved Hawkeye confidentiality statement.

We respect the intellectual property rights of others –

Hawkeye Industries protects its own secrets and respects the intellectual property rights of others. Employees must not obtain confidential information of other parties by improper means or disclose it without authorization.

We avoid and manage conflicts of interest-

Conflicts of interest can arise where personal interests or family and other allegiances are at odds with the interests of the company. We can avoid conflicts of interests if we are aware of the challenge and take the necessary action. In general, we should avoid situations in which personal interests, outside activities, financial interests, or relationships conflict or appear to conflict with the interests of Hawkeye and not allow business dealings on behalf of the company to be influenced by personal considerations or relationships.

The most frequent conflicts of interest arise when an employee is in a position to award business contracts, hire staff, has access to information that may be of interest to the financial markets, or is offered employment by a competitor. Here are some examples of potential conflicts of interest:

- Outside employment: participating in a position similar to the job at Hawkeye that may conflict with the performance of the job at Hawkeye Industries, or working with an actual or potential competitor, supplier or customer of Hawkeye.
- Family members and close personal relationships: contracting with a business managed or owned by a family member or unmarried partner.
- Investments: acquiring an interest in property or companies, which Hawkeye may have an interest in purchasing.
- Board memberships: acting as or accepting a position as an officer, consultant, or director of any business or organization involved in the same industry as Hawkeye or served by Hawkeye such as supplier or customer.
- Significant ownership interests: owning certain amounts of other companies that do or seek to do business with Hawkeye or which or competitors.

Employees who think they may be in a “conflict” must inform their immediate supervisor or the human resources representative so that the company can determine whether a conflict exists. They will be advised of the proper actions to take, in line with the rules established by the owners of Hawkeye.

We protect privileged information –

Inside information is information not readily available to the public that an investor or any other business partner would consider important in deciding whether to buy or sell a company’s securities. It can be information affecting securities of Hawkeye or of another company.

Because inside information may have considerable value to potential investors, it is strictly guarded to preserve the confidence in and the integrity of Hawkeye affairs. The owners of Hawkeye have strict guidelines for the dissemination of such information, which includes financial data, plans for the future of the business, and changes to key personnel. Anyone with inside knowledge is prohibited from disclosing privileged information. If employees are unsure whether they have “inside” information, they should contact their supervisor or a representative of company ownership.



Trading securities such as shares or bonds while in possession of insider information is both unethical and illegal, and will be dealt with decisively. It is not permitted to share inside information with Hawkeye employees unless they need to know and are aware of their obligations in handling the information. It is against the law to “tip” or share information with others, including a co-worker, family member or friend, who might make an investment decision based on inside information.

We comply with anti-money laundering rules –

Hawkeye Industries’ commitment to fairness, honesty, and openness extends to complying fully with all money-laundering laws throughout the world. Money laundering generally occurs when funds from illegitimate sources are brought into legitimate financial channels to hide them or make them appear legitimate.

Employees must protect the integrity and reputation Hawkeye Industries by helping o detect possible money laundering activities. They should learn to watch for warning signs, which may include customers who are reluctant to provide complete information or wish to make payments in cash.

We keep accurate and complete financial records –

Investors, creditors, and others have a legitimate interest in Hawkeye’s accounts. The integrity of the accounts depends on the accuracy, completeness and timeliness of the entries. All Hawkeye business transactions must therefore be fully and fairly recorded in accordance with Hawkeye procedures, generally accepted accounting principles (GAAP), and other appropriate requirements. Improper or fraudulent documentation or reporting is illegal.

We act with integrity in handling corporate opportunities –

We respect the company’s assets and seek to take personal opportunities or personal gain discovered through the use of Hawkeye Industries property, information or position.



Responsibility

We show responsibility when we choose business partners with care...

How Hawkeye Industries does business is crucial to its reputation and success and business partners should be seen as allies. In this section, there are guidelines on the appropriate conduct towards suppliers, agents and consultants, among others. The standards in place at a joint venture should also be compatible with those of Hawkeye Industries.

We are fair in our relations with suppliers –

Hawkeye Industries expects fair competition in its markets and applies the same standard in dealing with suppliers. If you select and/or deal with suppliers, you should not show any favor or preference to any person or business based on anything other than the best interests of Hawkeye. You must not let your business dealings on behalf of the company be influenced by personal or family interests.

Similarly, all purchases of goods and services for Hawkeye Industries must be made in accordance with company policies.

We collaborate with agents and consultants –

Commissions or fees paid to agents and consultants must be reasonable in relation to the services provided. Employees must not agree or pay commissions or fees that could be considered to be improper payments.

Agreements with consultants, brokers, sponsors, agents, or other intermediaries shall not be used to channel payments to any person or persons, including public officials or customer employees.

We build ties with subcontractors who act like us –

We rely on subcontractors to help us execute some projects and value the contribution they make to Hawkeye's customer relationships and to the company's reputation. To protect and enhance Hawkeye's reputation, we choose subcontractors who will act in a manner consistent with this Code of Conduct.

We team up with like-minded partners for joint ventures and alliances –

Hawkeye's strength of success also depends on building long-lasting relationships with partners that share our commitment to ethical business principles. The standards of any joint ventures should be compatible with Hawkeye's.

We extend standards of openness to lenders and other credit agencies-

Hawkeye Industries will disclose all relevant material facts for obtaining financing. It is also company policy to disclose all material facts that would be responsive to any prospective lender's analysis. Certificates issued by Hawkeye Industries as an exporter must be signed in accordance with Hawkeye's compliance regulations and standards.



Responsibility

We show responsibility when we observe the highest ethical standards in our interaction with government...

Hawkeye Industries interacts with different groups of stakeholders including customers, suppliers, shareholders, the media, non-governmental organizations, and local officials. The interaction of employees with government and government officials is of particular importance. In this section, guidelines are set out on working with officials when, if any at all, political contributions are allowed.

We cooperate fully with officials-

Hawkeye values good relations with governments. National and local governments around the world have specific and varied procurement laws to protect the public interest. They generally prohibit offering benefits to individual officials and often include limitations on hiring current or recently retired officials. Any conduct that may be viewed as improperly influencing objective decision making is forbidden.

Hawkeye employees must be truthful and accurate in interactions with government officials and observe the highest ethical standards when conducting business with government representatives.

In dealing with a government, employees are responsible for knowing and complying with applicable laws and regulations, and must not contact government officials on behalf of the company unless it is their job.

We let employees contribute to public affairs in their own time –

Employees are free to contribute (without company reimbursement) to a political candidate or party using their own personal time, money, or other resources.

Hawkeye funds, property, or services must not be used to support any candidate for political office, political party official, or committee anywhere in the world. Any exceptions to this must be cleared in advance with company ownership.



Respect

We show respect for each other when we help each other succeed...

The people who work at Hawkeye come from many different backgrounds and cultures. We can only appreciate the contribution of each individual if we observe normal standards of courtesy and respect when interacting with one another. Hawkeye will also be judged by outsiders according to the way they are treated in their business dealings with the company. Clear and regular communications, diversity, equality of opportunity, and upholding health and safety are essential to fostering a work environment in which everyone will feel welcome and comfortable.

We foster regular and open communication –

Regular communication between managers and their teams is key to business success. This communication, which usually takes the form of meetings and briefings, should cover business strategy, long-term objectives, and short-term priorities. Complemented by support from top management in the form of newsletters, web sites, training, presentations, etc., communication between employees and their superior should include making clear how employees are contributing to Hawkeye's goals.

Employees have a right to receive their superiors assessment of their performance, which is expected to ascertain progress and, where appropriate, to include proposed plans for further development.

We value mutual respect and privacy –

The privacy of personal information – whether from employees, customers, contractors or vendors – is to be respected at all times. Employees must collect, use, store, handle, and disclose individual personal information in accordance with the Hawkeye Industries privacy policies and applicable laws. Employees may, however, not claim any privacy privileges for communications transacted through the Hawkeye facilities, beyond those provided by local legislation.

Subject to local legislation, Hawkeye is authorized to supervise the use of e-mail and the internet. All e-mail and internet communications made through Hawkeye facilities are treated as Hawkeye business information and so may be accessed, retrieved, monitored, and disclosed by Hawkeye.

We celebrate diversity –

Hawkeye views diversity as an asset. We welcome all, regardless of gender, nationality, age, or physical ability, or any other aspect of diversity. Employees must conduct their business activities with co-workers, customers, stakeholders and business partners with respect for all people without regard to differences or similarities.

Hawkeye Industries hires and promotes people based on their abilities. Employees should not engage in or support discrimination in hiring, compensation, access to training, promotion, termination or retirement based on gender, age, ethnic and national origin, caste, religion, disability, sexual orientation, union membership, or political affiliation.

We work to create an environment free of harassment –

Employees won't feel welcome and comfortable at Hawkeye Industries if they, their coworkers, or anyone who has business dealings with Hawkeye faces harassment. Harassment – be it face-to-face, written, electronic, or verbal – will not be tolerated.



Harassment can take many forms. People may feel harassed by slurs, intimidating or aggressive acts or words, by derogatory jokes or inappropriate gestures or by unwelcome physical or verbal conduct. Harassment can also be the communication or display of offensive material linked to any of the aspects of diversity mentioned above, such as gender, religion, race, nationality, sexual orientation or physical ability.

We set the highest health and safety standards –

It is our duty to our colleagues, their families, and their communities to safeguard the health and safety of every employee at work. Hawkeye's stringent health and safety policies and reporting requirements are in place to protect the lives and good health of employees.

Hawkeye's ground rules for employees are: work safely and protect yourself, your coworkers, the community and the environment. The policies, procedures and programs promote safe and healthy working conditions, protect the environment, and support Hawkeye's commitment to compliance with applicable laws and regulations.

You should know and comply with the law and related company policies if you have responsibilities in areas that are subject to safety and/or environmental regulations.

It is also imperative to report dangerous conditions immediately so that workplace accidents are minimized and corrective actions can be taken.



Respect

We show respect when we acknowledge our wider social responsibilities...

We at Hawkeye pride ourselves in being “at home” in the community in which we operate. Observance of the rule of law is a basic underpinning of our license to operate.

In this section, we look at what Hawkeye Industries can expect from employees in areas ranging from compliance with the law to protection of the environment. Promoting a sustainable approach to business in the way in which we operate is a key element of good corporate citizenship and of being “at home” globally.

We respect the law –

Upholding Hawkeye’s reputation for integrity requires absolute compliance with the law for Hawkeye and all employees. Employees are expected to be familiar with the law as it applies to their job and management is expected to provide necessary instruction and advice.

For example, Hawkeye Industries is strongly committed to non-discriminatory and fair standards, to the protection of the environment, and to the health and safety of employees.

Hawkeye expects employees to comply with all laws designed to protect health, safety and the environment, to obtain all required permits, and to operate facilities in strict accordance with the relevant laws.

Due to the complex regulatory environment in which we conduct business, issues of legal compliance may arise. On occasion, there may be disagreement or confusion on whether Hawkeye is in full compliance with the law, especially when one regulatory directive conflicts with another. It is important for Hawkeye management to be informed of any such issues at an early date. Employees have a responsibility to inform management immediately if there is any indication that such an issue may exist. At all times, Hawkeye will act responsibly, seek guidance and clarifications, and will abide by all decisions rendered by the courts.

We promote sustainable development –

Every Hawkeye employee contributes to the company’s sustainability efforts by supporting economic progress, environmental stewardship, and social development. One aspect involves taking appropriate initiatives that improve the quality of life in the communities in which we operate.

Sustainability means that Hawkeye treats all stakeholders in a socially responsible manner. Employees can contribute by promoting open dialogue with stakeholders regarding Hawkeye’s economic, social, and environmental contributions and performance. To do so, employees should familiarize themselves with Hawkeye’s policy on sustainability, and its economic, environmental, and social requirements.

We support environmental responsibility –

All Hawkeye employees have the responsibility to comply with the letter and the spirit of environmental laws and regulations and respect the environment, wherever they work.

We are active members of our communities –

Just as Hawkeye, on a corporate level, strives to exercise citizenship by reaching out to the wider community – through specific projects, charitable donations, and practical support for worth initiatives – the company also encourages individual employees to make an active civic contribution.



Reporting non-compliance

The standards addressed in the Code of Conduct represent the core of Hawkeye's group culture and commitment. Group-wide and uniform compliance is essential and every employee is responsible for upholding these principles.

All employees are required to report any suspected or observed violations of the law, of this Code of Conduct or of company policies – or if they are asked to do something that might be a violation. Reports may be made to your supervisor or staff management or business owners. Confidentiality will be maintained to the fullest extent possible. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct will not be tolerated and will be subject to disciplinary action. The same applies to any intentional abuse of the reporting process.

Employees who have questions about a specific situation should ask for help by using any of the aforementioned contacts. The key is to speak up and bring concerns into the open so that problems can be resolved quickly before serious harm can occur.

It is also a breach of this Code of Conduct to fail to report a violation or suspected violation that employees know about or to refuse to cooperate with the investigation of a suspected violation.

Penalties for violation –

Each employee is responsible for ensuring that his or her conduct and the conduct of anyone reporting to the employee fully comply with the applicable laws, the Code of Conduct and the company policies. Compliance, both personal and by subordinates will be a factor in periodic performance appraisals.

Hawkeye applies “zero tolerance” and will take disciplinary action, up to and including termination of employment, against employees who violate the law, this Code of Conduct, or company policies.