# Document Control

## Versioning

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| --- | --- | --- |
| **Name** | **Date** | **Reason** |
| Version 1 | February 1, 2019 | Placed into production |

## Applicable Parties

This document is strictly confidential and should only be distributed or viewed by the following parties:

* HAL Designated Associates
* HAL Regional Employees (Compartmented to the Division)
* HAL Management Team
* HAL Auditing Team

## Review Period

This document is subject to review by the Information Security Policy Committee (ISPC) at a minimum interval of quarterly (every 3 months) at a maximum interval of bi-annually (every 6 months).

### Previous Reviews

|  |  |  |
| --- | --- | --- |
| **Committee** | **Review Date** | **Approval Date** |
| ISPC | 7/15/2018 | 8/1/2018 |
| CEO | 1/21/2019 | 1/22/2019 |
| Corporate CIO | 1/23/2019 | 1/23/2019 |

# Purpose

The purpose for this ethics policy is to establish a culture of openness, trust and integrity in business practices. Effective ethics is a team effort involving the participation and support of every HAL employee. All employees should familiarize themselves with the ethics guidelines that follow this introduction.

HAL is committed to protecting employees, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. When HAL addresses issues proactively and uses correct judgment, it will help set us apart from competitors.

HAL will not tolerate any wrongdoing or impropriety at any time. HAL will take the appropriate measures act quickly in correcting the issue if the ethical code is broken. Any infractions of this code of ethics will not be tolerated.

# Scope

## Applicability

This policy applies to all HAL employees and affiliates at all HAL facilities and locations world-wide.

## Ownership

This policy is under the direct control of the HAL Corporate CIO with input from other members of management with an interest in the program.

# Policy

## Executive Commitment to Ethics

Top brass within HAL must set a prime example. In any business practice, honesty and integrity must be top priority for executives.

Executives must have an open door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert executives to concerns within the work force.

Executives must disclose any conflict of interests regard their position within HAL.

## Employee Commitment to Ethics

HAL employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.

Every employee needs to apply effort and intelligence in maintaining ethics value.

Employees must disclose any conflict of interests regard their position within HAL.

Employees will help HAL to increase customer and vendor satisfaction by providing quality product s and timely response to inquiries.

## Company Awareness

Promotion of ethical conduct within interpersonal communications of employees will be rewarded.

HAL will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

## Maintaining Ethical Practices

HAL will reinforce the importance of the integrity message and the tone will start at the top. Every employee, manager, director needs consistently maintain an ethical stance and support ethical behavior.

Employees at HAL should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.

HAL has established a best practice disclosure committee to make sure the ethical code is delivered to all employees and that concerns regarding the code can be addressed.

## Unethical Behavior

HAL will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.

HAL will not tolerate harassment or discrimination.

Unauthorized use of company trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company will not be tolerated.

HAL will not permit impropriety at any time and we will act ethically and responsibly in accordance with laws.

HAL employees will not use corporate assets or business relationships for personal use or gain.

# Enforcement

Any employee found to be in violation this policy may be subject to disciplinary action, up to and including termination of employment.