



TRISTAR

Dear Valued Business Partner:

At TRISTAR, we hold firmly to basic business values that we will act with integrity, build mutual trust and respect, value our people, drive innovation, and deliver solutions. Your partnering with us allows us to jointly live out these values through our business relationship.

We hold ourselves to a high standard and expect the same from our Valued Business Partners. This high standard requires operating honestly, meeting commitments, using fair business practices, delivering value, and ensuring that your employees act in a like fashion.

With this letter is a summary of our TRISTAR Code of Conduct Policy. As a Government contractor, we must be diligent in maintaining our commitment to procurement and contract performance integrity. We will flow down all applicable Government ethics requirements as a normal practice and will ensure compliance as part of our normal subcontract and supplier contract administration. If you do not have a Code of Business Conduct and Ethics, please conform to the TRISTAR guidance provided below.

Our policy is predicated on maintaining impartiality and mutual respect. We wish to avoid even the appearance that our business decisions are not based on the merits of our professional relationship. Our policy is that our employees may never solicit gifts or favors that would create an obligation or influence the business relationship. Employees who are involved in procurement or source selection may never offer or receive anything of intrinsic value.

If you become aware of any improper business conduct or ethics concern on the part of our employees, please contact either our Human Resources Department at (812) 675-4978 or our anonymous ethic hotline at (800) 401-8004 (within the U.S. and Canada) or via email reports@lighthouse-services.com (must include company name with report).

Thank you for your attention to this very important matter. We look forward to a successful business relationship.

Sincerely,

Christina M. Agresti

Christina M. Agresti
Chief Operating Officer

www.star3.com

TRISTAR Headquarters 1801 S. Liberty Drive, Suite 200, Bloomington, IN 47403

TRISTAR
Experience | Innovation | Solutions

Our Core Values

- *Act with Integrity*
- *Build Mutual Trust and Respect*
- *Value our People*
- *Drive Innovation*
- *Deliver Solutions*

TRISTAR's Business Conduct and Ethics Expectations for our Business Partners

Every day at TRISTAR we are changing the world for the better, solving our customers' complex challenges by leveraging our experience with impactful thinking and innovative solutions. We have decades of history in building our ethical culture, and allowing us to say that we are "Built with Integrity." We expect that our Valued Business Partners hold themselves to the same high standards to ensure that we can continue to do business together in the future.

Inspiring Integrity in All We Do

The TRISTAR Code of Conduct demands that we act with integrity in all that we do. We have a commitment to doing the right thing, every day, in every interaction, and in every location where we operate.

Complying with Laws and Regulations

While we comply with all laws and regulations in the United States, TRISTAR is a global company with operations in various locations. Laws differ among the various locations where we conduct business, but we understand our obligation to know and follow the laws and regulations (as well as any national and international restrictions) that apply to our business and the countries where we operate.

Promoting a Safe and Respectful Workplace

A Safe Workplace — We always embrace safety first. We relentlessly pursue safety excellence to identify best practices, continually improve outcomes, and optimize our operational performance. We comply with all applicable laws, regulations, and company programs and procedures related to the Environmental, Health & Safety (EHS) aspects of the work we perform and the facilities we control. When you believe an EHS violation exists or that a situation poses the potential for physical harm or imminent danger affecting TRISTAR employees, its clients, subcontractors, general contractors, or the public, stop work and report the situation to a TRISTAR supervisor or manager with no fear of retribution.

A Respectful Workplace — TRISTAR is committed to fostering a workplace where everyone is treated with dignity and respect. As part of our commitment to our global community, we maintain positive, productive work environments and uphold individual human rights. We respect the employment laws of the locations in which we conduct business.

Protecting Information and Property

Protecting Information — Accurate and complete business records helps us to build trust with our clients and our business partners. We ensure that our business records are honest, accurate, and complete. We take steps to protect our information and systems from accidental or unauthorized access.

Protecting Property — We are responsible for protecting our assets from loss, damage, misuse, theft, and waste by using them wisely and only for business purposes.

Working with our Customers and Business Partners

Honest and Fair Dealings — We operate with a focus on complete honesty and accuracy in everything we say, do, or write. We treat each customer fairly and honestly and we honor our promises to our employees, customers, and business partners. We do not engage in any conduct that may constitute a possible or perceived conflict of interest and expect the same from our business partners.

Working with the Government — We are committed to meeting the many special legal, regulatory, and contractual requirements that apply to our government contracts. We follow the Federal Acquisition Regulation and Agency Supplements, public laws, the requirements of the contract, as well as operational and functional company policies and procedures specific to the federal government contracting environment.

Working with Suppliers — We recognize that our relationships with suppliers, consultants, and other third parties are critical to our success, so we work with business partners who live up to our high standards. We honor our contractual obligations and require that our business partners, in turn, honor theirs.

Following the Letter and the Spirit of the Law

Gifts and Entertainment — We make sure that anything given or received complies with our policies, our contractual obligations, and the law. We do not receive or accept gifts or entertainment that may reasonably be deemed to affect individual judgment or actions in performance of our company's responsibility. Our valued business partners (as well as customers and the public-at-large) should know that our judgment is not for sale.

Fair Competition — We are committed to promoting fair competition at all times; we never engage in or support unfair or predatory business practices. We do not violate competition laws, such as agreements about prices, terms, or conditions of sale; dividing or allocating customers, bids, markets, or territories; or refusing to do business with particular third parties.

Anticorruption and Bribery — TRISTAR is proud of the work we do throughout the world. We believe that our ability to foster good working relationships with companies, communities, and governments around the world depends on acting ethically in all our business dealings. TRISTAR complies with all United States (U.S.) domestic anti-corruption laws that prohibit bribery within the U.S. and with the U.S. Foreign Corrupt Practices Act that prohibits corrupt payments outside of the U.S., as well as all other applicable laws in every country in which we do business. Any attempt to gain a business advantage through prohibited activities (such as illegal payments, bribes, kickbacks, gifts, or other inducements) are not tolerated.

International Work — TRISTAR regularly conducts business in countries around the world. Our laws are designed to ensure that U.S. origin products, services, and technology do not end up in the hands of countries or groups that would use them to compromise U.S. national security. We strictly comply with applicable U.S. laws and regulations that govern international business. We comply with the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR), and other regulations of the U.S. or other countries that may apply.

Reporting Concerns

Concerns from our Business Partners can be addressed by calling our Ethics Hotline at (800) 401-8004 (within the U.S. and Canada).

