

How We Do Things at Husky Sporting Company and What We Expect of You as Our Partner

- 1. We conduct business honestly and ethically** and live by the standards set forth in our Code of Conduct. Above all else, our Partners must understand that we demand that they always conduct business with the highest levels of integrity and always in compliance with the law. We expect our Partners to review and become familiar with the contents of this Partner's Guide and ensure that they understand how the principles set forth in this Guide apply to them.
- 2. We treat one another with dignity and respect.** Everyone deserves to be treated with respect, courtesy, consideration and professionalism. We will not tolerate discriminatory behavior or conduct that is harassing or otherwise inappropriate. This applies not just to your interactions with our employees and our customers – we expect you to uphold these principles in your day to day business.
- 3. We do not pay or promise bribes or otherwise engage in corrupt activities.** Our Partners must ensure that they understand and comply with all applicable anti-bribery and anti-corruption laws, treaties and conventions including the U.S. Foreign Corrupt Practices Act. Simply put, paying bribes and engaging in corrupt activities is not the way we do business. We would rather walk away from a potentially lucrative deal than do anything that would violate any anti-bribery/anti-corruption law in letter or in spirit. We expect the same commitment to compliance with anti-corruption laws and principles from our Partners.
- 4. We protect our confidential information** and respect the rights of other companies to do the same. All of our Partners must safeguard confidential and proprietary information about Husky Sporting Co, and its customers, and ensure they are not improperly using information that belongs to others in the performance of services on Husky's behalf.
- 5 Our Partners must protect Husky's proprietary information** by ensuring that such information is accessed, stored and transmitted in a secure manner consistent with the business purposes between the Partner and Husky Sporting Co. If you learn about or suspect any misuse, unauthorized use or improper requests for access to confidential information, we expect you to immediately notify Husky Sporting Company's Legal Department
- 6. We maintain the trust of our shareholders by completely and accurately reporting financial information.** We are required to comply with various laws, regulations, reporting obligations and procedures that require us to disclose accurate and complete information regarding our business, financial condition and results of operations. We expect our Partners to share a similar commitment to financial accountability which includes always providing timely and completely accurate financial information to us.
- 7. We are transparent when conducting business.** All agreements and proposals that Partners negotiate with Husky or on its behalf must accurately encompass ALL agreed-upon terms and conditions. We strictly prohibit side agreements and side letters in any form.
- 8. We compete fairly in the marketplace.** Our Partners must understand and abide by competition laws (also called anti-trust laws) and ensure they are not engaging in conduct that restricts robust competition in the marketplace. Some examples of things that are prohibited under competition laws include: a. Fixing or controlling prices b. Sharing information with competitors about pricing, contract terms, sales, costs, profits or any other confidential competitive information c. Dividing or allocating customers, bids, markets, or territories d. Express agreements as well as informal understandings between competitors may constitute illegal agreements prohibited by these laws. 8.

We steer clear of conflicts of interest. We expect our Partners to be mindful that there may be times when their interests may conflict or appear to conflict with our interests. In all such instances, we expect our Partners to promptly notify us of the potential conflict so that we can investigate it and determine the correct course of action under the circumstances. Our Partners should clearly understand that they should never accept or give a gift or offer of hospitality to a third party (including our employees or our customers) if doing so will improperly influence or appear to improperly influence the person who receives it. Gifts of nominal value and occasional ordinary, non-extravagant hospitality where business will be discussed are generally permissible. When in doubt, err on the side of not giving or accepting the gift or offer of hospitality.

9. **We comply with export regulations.** We expect our partners to comply with all national and multinational export and import control laws that apply to our products and services.

10. **We respect the privacy of our employees, customers and others with whom we do business.** As a global company, we are required to comply with many privacy and data protection laws around the world. We expect our Partners to respect the privacy rights of all individuals whose data they may access on behalf of Husky and to notify Husky if they become aware of any breach or misuse of such data.

11. **We speak up when we have questions or concerns.** We will promptly investigate all reports of suspected wrongdoing in relation to doing business with Husky, and strictly prohibit retaliation of any kind against any Partner that raises an issue or concern in good faith. We expect Partners who have questions about the way we are conducting business to address their concerns by contacting compliance@huskysporting.com

12. **We all play a part in contributing to an ethical business culture.** Escalating concerns about appropriate business practices, disclosing potential conflicts of interest and fully cooperating (when requested) in compliance investigations are just a few of the ways we expect our Partners to help contribute to maintaining an ethical business culture here at Husky