



Anti-Corruption

Our Commitment

HASCO, Inc. does not engage in or tolerate corruption of any kind within its business dealings; either domestically or abroad. If at any time we detect or become aware of a violation of corrupt or unethical behavior among our personnel, we will take aggressive action to correct these behaviors or terminate the non-compliant employee(s).

What is Corruption?

Corruption, as defined within our Code of Conduct, which is appropriate and specific to our industry and type of business, is activity pertaining to bribery or kickbacks. Bribery is the act of giving money, goods or other forms of compensation in exchange for an alteration of the recipient's behavior (to the benefit of the giver) that the recipient would otherwise not alter. A kickback is a form of negotiated bribery in which a commission is paid to the bribe-taker in exchange for services rendered.

Ensuring an anti-corrupt environment is important, specifically during these times when many foreign countries are fighting a long-standing culture of corruption and thus creates challenges for anyone doing business internationally.

Our Approach

HASCO, Inc., through the use of our internal Code of Conduct, flows down strict requirements against bribery and kickbacks. Our employees are trained to the code and held accountable for their actions.

Training includes a focus on the US Foreign Corrupt Practices Act (FCPA) of which a violation would be considered: *Giving OR offering OR promising, directly OR indirectly, anything of value to any foreign official, political party, or candidate with the intent to corrupt, obtain OR retain business OR gain an improper business advantage.* Compliance with anti-bribery requirements is also flowed down to our suppliers through contractual clauses.