

Hyde Park

PARTNERS

ETHICS POLICY

Hyde Park Partners conducts its business fairly, impartially, in an ethical and proper manner, and in compliance with all laws and regulations. Our desire is to communicate clearly what it means to be a leader of ethical practices across each of our business units [Livingston & Haven, AEG International, MRO Stop, MASS]. We are committed to conducting ourselves in such a way that invokes trust, demonstrates integrity, establishes clear checks & balances, and raises the level of accountability for every area of the company.

Our success is dependent on the ability to earn the trust and confidence of our associates, customers, vendors, and corporate partners. When our conduct aligns with what we have communicated and committed to, trust and credibility will follow. This can be the difference between existing in a market and being a market leader.

Leadership Expectations

While all associates are called to ethical conduct, we believe that it starts with the top management and works its way through the organization. To this end, we expect our leaders to demonstrate our values in all behavior and decisions.

Each company leader is responsible for compliance in their area of responsibility. Hyde Park Partners leaders are expected to promptly address any ethical questions or concerns raised by associates and take the appropriate steps to deal with such issues. It is the leader's responsibility to create an atmosphere where associates feel safe to raise ethics concerns without fear of reprisal.

We all benefit when associates use the C-H-A-R-A-C-T-E-R trait of awareness to help prevent mistakes or wrongdoing by asking the right questions at the right times. At Hyde Park Partners, our desire is for transparent discussions so together we can achieve the highest level of success while maintaining consistent ethical business practices.

Business Conduct

As associates of Hyde Park Partners, we have been given guidance for business conduct. Our strategic objectives communicate what we are looking to accomplish and C-H-A-R-A-C-T-E-R establishes how we are expected to do it. As we commit to these, our company, our families, and our community will feel the impact.

To that end, Hyde Park Partners is committed to conducting its business with integrity underlying all relationships, including those with associates, customers, vendors, and corporate partners. We expect the highest ethical standards to be set and maintained by all. Associates will not engage in conduct or

activity that may raise questions as to our honesty, impartiality, and reputation or otherwise cause embarrassment to the company. Associates will avoid any action, whether or not specifically prohibited in the Hyde Park Partners policies, which might result in or reasonably be expected to create an appearance of:

- Using HPP employment for personal gain.
- Giving preferential treatment to any person or entity.
- Establishing a conflict of interest.
- Adversely affecting the confidence of anyone in the integrity of the company.

In addition, our focus is providing solutions using the best products, technologies, and services in order to continually delight our customers. In order to accomplish this we will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Hyde Park Partners or the sales of its products or services whether we are conducting business domestically or internationally.

All Hyde Park Partners associates and leaders will avoid any actions that could even create a perception that favorable treatment of outside entities was sought, received, or given in exchange for unethical personal or corporate gain. To maintain an above reproach standard, we will not accept business courtesies that are, or could be perceived as, unfair gifts that would or appear to violate law, regulations, or policies of Hyde Park Partners. This standard goes for any effort to gain our business that could cause embarrassment or have a negative impact on our reputation with our associates, our customers, and our community.

Compliance

Hyde Park Partners is committed to integrity and uncompromising values and welcomes associates to dialogue particularly with respect to ethics concerns. Every associate has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this policy.

The HR department is responsible for providing policy guidance and issuing procedures to assist associates in complying with Hyde Park Partners expectations of ethical business conduct. Associates are encouraged to initially address such issues with their leader or the Human Resources Manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an associate is not comfortable raising the issue with their leader or Human Resources, the CEO of Hyde Park Partners does operate with an open-door policy.

Hyde Park Partners will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against associates who raise genuine ethics concerns in good faith.

Any violation of this policy will subject the associate to disciplinary action as laid out in the handbook up to and including immediate discharge. An associate having knowledge of any violation of the policy shall promptly report such violation to the appropriate level of management.