## HOBBY LOBBY

## **Anti-Corruption Policy**

Hobby Lobby Stores, Inc. ("Hobby Lobby"), is committed to conducting business in an ethical manner and in compliance with applicable law. Hobby Lobby and its agents, including Hong Kong Connections ("HKC"), require the same from all vendors and suppliers. To meet this requirement, all vendors and suppliers are expected to comply with this Anti-Corruption Policy to avoid creating an actual or a perceived conflict of interest or corrupt business practice.

## Vendors and suppliers are prohibited from:

- Offering, paying, or receiving a bribe.
- Giving, offering, authorizing or receiving money or anything else of value to any
  person in order to improperly influence any act or decision, or to otherwise gain an
  improper benefit or advantage.
- Making anti-competitive agreements with your competitors regarding sales made to Hobby Lobby.
- Sharing non-public pricing, costs, designs or other sensitive information with your competitors.
- Providing or sharing confidential information received from Hobby Lobby, HKC, or
  other agents with any third party, including other retailers, vendors, or suppliers. This
  includes terms of supply, product rollout plans, Hobby Lobby's future or otherwise
  non-public retail prices, promotions, sales, marketing and promotional strategies and
  plans, production or sales volumes or forecasts, or other trade secrets.
- Recruiting, whether directly or indirectly, any Hobby Lobby, HKC, or other agents' employee with intent to gain an improper benefit or advantage.

## Vendors and suppliers are required to:

- Comply with all applicable anti-corruption and anti-competition laws.
- Report actual or suspected violations of this Anti-Corruption Policy, including violations by Hobby Lobby, HKC, or other agents' employees, and other vendors or suppliers, by emailing <a href="mailto:anti-corruption@hobbylobby.com">anti-corruption@hobbylobby.com</a> or calling 1-800-713-9202.

Hobby Lobby representatives may periodically audit the actions of Hobby Lobby, HKC, and other agents' employees, and vendors and suppliers, to verify compliance with this Anti-Corruption Policy. Vendors and suppliers agree to cooperate with such verification efforts. Hobby Lobby reserves the right to suspend future orders or to terminate its relationship with vendors and suppliers who fail to comply with this Anti-Corruption Policy.

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