

## Honesty, Integrity and Professionalism

Hannas requires its employees to act honestly, with integrity and professionalism in the conduct of all activities they undertake on behalf of the Company.

Hannas requires employees to comply with all legal, statutory and regulatory requirements including the codes of conduct of any professional and industry bodies with which the Company is associated.

Each employee has an obligation to behave at all times with honesty and propriety as Hannas depends for its business success on its reputation for integrity and on the trust and confidence of everyone with whom it deals.

Hanna has a strict policy of Honesty, Integrity and Professionalism that is binding upon all direct employees and in so far as the law applies to sub-contractors whilst engaged by Hannas or its subsidiaries.

The core values upon which this policy is built include:

- always acting with fairness, honesty and integrity,
- being aware of and complying with all laws and regulations,
- maintaining the highest standards of professional behaviour,
- dealing honestly through all communications and interactions with external parties,
- striving to deliver quality products and services in accordance with contract requirements and company standards,
- reporting in an accurate and timely fashion,
- being diligent in not accepting or offering courtesies to/from customers, suppliers or authorities for the purpose of obtaining favourable treatment or advantage,
- avoiding or revealing to management any perceived or actual conflicts of interest,
- completing company payments and other transactions accurately and ensuring they are accurately recorded on the Company's books and records.

In accordance with our values of integrity and professionalism the use of company infrastructure - e-mail and the Internet/Intranet for transmission or storage of non work related material, particularly of a sexual or offensive nature shall not be tolerated. Any use of Company electronic communications for non-business purposes should be occasional, not interfere reduce productivity, and not violate this or any other Hannas' policy.

Managers are responsible for ensuring adherence to the provisions of this policy. All staff are responsible to assist the Company in achieving the objectives of the policy.

A handwritten signature in black ink, appearing to read 'Danny Hanna'.

**Danny Hanna**  
Chief Executive Officer  
Hannas  
05 February 2010