



**GREENSTAR**  
SERVICES CORPORATION

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Best Practices  
for Professionals  
And Support Staff

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**CODE OF BUSINESS ETHICS**



# CODE OF BUSINESS ETHICS

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# CODE OF BUSINESS ETHICS

*The Code of Business Ethics symbolizes GreenStar Services Corporation's commitment to conduct business with the highest ethical standards. It sets forth the principles that guide our business operations. Each of us has a personal responsibility to abide by these standards and principles.*

*We at GreenStar Services Corporation strive to provide high quality services at fair prices, to conduct ourselves with the highest level of integrity in our dealings with customers, suppliers and others, and to treat one another with courtesy, respect and without discrimination. Our continued success will be achieved through the dedication of our people to these standards and the value they bring to our service to customers.*

*The purpose of this Code is to foster and maintain honest and ethical practices in GreenStar Services Corporation workplace and in all of our customer, competitor, labor, government and community relations.*

All GreenStar Services Corporation officers, directors and employees are required to sign an acknowledgement that they have received a copy of this Code. GreenStar Services Corporation will keep these signed acknowledgements on file, and will prominently display this Code at each of its job sites.

Adherence to this Code by GreenStar Services Corporation's officers, directors and employees will shape GreenStar Services Corporation's corporate image and serve its long term interests and profitability. While GreenStar Services Corporation recognizes that direction and example must come from the very top of the organization, the fulfillment of the principles embodied in this Code depends upon the contribution and commitment of all its employees.

## **I. Commitment to honest and ethical business practices**

It is GreenStar Services Corporation's policy to be guided first and foremost by good business ethics and all applicable laws, rules and regulations. We believe that building trust and confidence by acting honestly and with integrity will enhance our success and profitability. We will strive to do this in our relationships with each other in GreenStar Services Corporation and with customers, suppliers, government agencies, and others with whom GreenStar Services Corporation has or may have a business relationship.

### **Illegal acts:**

Any acts by GreenStar Services Corporation officers, directors or employees that violate the law, including bribery, fraud, theft, and illegal collusive and anti-competitive practices, and harmful to GreenStar Services Corporation and its business and may expose GreenStar Services Corporation to severe penalties. GreenStar Services Corporation will refer any such suspected conduct, and any other illegal acts by or involving GreenStar Services Corporation officers, employees or directors, to the appropriate authorities for further action and will cooperate in any subsequent investigation. GreenStar Services Corporation's employees are expected to and will be called upon to cooperate similarly. It is likewise GreenStar Services Corporation's policy to cooperate with every reasonable request for information by federal, state or local authorities regarding enforcement matters. All books and records that are or may be related to any such matters must be preserved during the pendency of any investigation.



### **Termination for criminal conduct:**

It is GreenStar Services Corporation's policy to terminate any officer, director or employee of GreenStar Services Corporation who is convicted of any violation of local, state or federal criminal law in connection with any matter relating to his or her employment or business association with GreenStar Services Corporation.

## **II. Reports of illegal and unethical acts and violations of this Code**

You must report any suspected or actual illegal or unethical conduct or other improprieties relating to GreenStar Services Corporation work to Stephen Kornfeld, Chairman at 914-330-7480 or Mark First, Director Eos Partners at 212-832-5807.

This includes conduct by other employees, officers and directors of GreenStar Services Corporation or any other person, including:

- A. Subcontractors and suppliers to Green Star Services Corporation**
- B. General contractors associated with GreeStar Services Corporation**
- C. Customers of GreenStar Services Corporation**
- D. Labor and union officials**
- E. Employees of government agencies**

## **III. Restriction on gifts and gratuities to or by officers, directors and employees**

Government employees: You may not give or receive any gifts, gratuities or anything of value whatsoever to or from any employees of government agencies in connection with the business of GreenStar Services Corporation. This includes gifts of property and money and payment for meals, drinks, travel or other forms of entertainment.

Non-government employees: You may not give or receive anything of more than token value (other than business courtesies, as described below) to or from persons and organizations other than government agencies in connection with the business of GreenStar Services Corporation. This includes the persons listed in paragraphs A to D in paragraph II above and the organizations they represent.

A token gift is generally one valued at \$50 or less. In general, any gift which might appear to influence a specific business judgment must be avoided.

Business courtesies, such as paying reasonably for meals or entertainment or hosting dinners in a business context, normally would not be a gift within the context of this policy. Such courtesies should always be given and accepted openly.

However, no such gifts or courtesies may be given or offered with intent to influence the recipient to do something specific, or refrain from doing something specific, in relation to any of his or her professional acts, decisions or duties, and, likewise, none may be accepted.

## **IV. Accuracy in record keeping and financial reporting**

All GreenStar Services Corporation financial and operational reports, accounting records, research reports,

expense accounts, sales reports, time sheets, requisitions for payment, payroll records, and other records must accurately and clearly present the relevant facts and true nature of conditions and transactions.

You must ensure that all such records are prepared and maintained with care and honesty and without misrepresentations or omissions.

## **V. Free and fair competition**

GreenStar Services Corporation delivers quality services to its customers by engaging in vigorous, fair and ethical competition. Business practices which are anti-competitive or unethical are prohibited.

No discussions may be held with competitors that are or may be construed by the competitor to be collusive or in any way contrary to GreenStar Services Corporation's commitment to compete in the marketplace for its services freely and fairly.

Bids must be made objectively and on a bona fide basis in light of cost and market conditions.

## **VI. Equal opportunity**

GreenStar Services Corporation's employment practices are based on equal opportunity for all employees, irrespective of age, race, color, sex, sexual orientation, religion, nationality, or physical/mental disability. Offensive conduct or harassment with respect to any of these characteristics will not be tolerated.

## **VII. Safe workplace practices**

GreenStar Services Corporation takes care to ensure that it complies with all laws, rules and regulations governing the maintenance of a safe and healthy working environment for all its employees.

## **VIII. Confidentiality**

This paragraph covers secret, confidential or proprietary information relating to GreenStar Services Corporation, including customer and supplier lists, product research and development, confidential systems, programs and procedures of GreenStar Services Corporation or of any GreenStar Services Corporation business unit, and information received by or from third parties under confidential conditions.

Information in this category must not be disclosed to anyone outside the company without a legitimate business reason and without obtaining prior authorization. Confidential information received from a customer or potential customer must likewise be protected from disclosure.

Any use of confidential information by an officer, director or employee of GreenStar Services Corporation for the benefit of a competitor or to gain a personal benefit may result in termination.

## **IX. Exceptions to this Code for specific purposes**

Requests for exceptions to any of the policies and standards set forth in this Code should be made to Stephen Kornfeld, Chairman. In general, such requests must be in writing and exceptions will only be made for specific purposes and after full disclosure of all relevant circumstances. For example, any gifts and business courtesies intended to be given during the December holiday season that are beyond the scope of the gifts and gratuities policy of this Code (Section III) must receive Stephen Kornfeld's prior approval.

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