



Code of Ethics and Business Conduct

Natural Habitats Code of Ethics and Business Conduct serves as a guide on how the company conducts its business. This Code of Ethics has been developed to ensure that our business is conducted in line with the principles and standards by which reflects professionalism and integrity across all areas of our operation and supply chain.

This policy applies to all dealings with employees, customers, suppliers and other stakeholders and serves as a guideline to all our employees to observe the highest standards of ethics and integrity in their conduct, as they perform their assigned duties. Compliance to this policy is mandatory for all employees and is one of the factors for performance evaluation.

FAIR TRADE AND DEALINGS

Natural Habitats respects and supports all its producers who work with the group or its subsidiaries as long-term trading partners. In particular, the Company seeks to establish a fair system of purchasing. This implies that producers receive a fair price and are paid in a convenient, timely and well-documented way.

Moreover, Natural Habitats and its subsidiaries strive to outperform the competition by adopting fair and ethical practices. All employees must deal fairly with all the Company's customers, suppliers, service providers, even competitors with whom everyone interacts while at work. The Company discourages manipulation, concealment, abuse of privileged information or misrepresentation of facts and unfair dealing practice.

Natural Habitats and its subsidiaries firmly believe that all customers must benefit from a free and fair market and must be provided with the best quality products and services at the best prices.

BRIBERY AND CORRUPTION

Natural Habitats and its subsidiaries will not tolerate corruption in all forms. This includes any form of bribery, extortion, kick back, facilitated payments and other corrupt behaviour. Employees are prohibited from engaging directly or indirectly by self or through intermediaries, to offer or receive any form of gifts, any personal, financial or other advantages, in order to obtain favours or secure business from a third party, public or private officials. Employees must actively refrain or avoid any situations that may mislead or create the appearance of an influence over a business decision.

These prohibitions apply to all directors, managers, officers, and employees, including those engaged in business with the company, such as suppliers, consultants or contractors.



DEFINITION OF TERMS

Bribery - Defined as an act of taking or receiving something of value, with the intention of influencing someone else to take any action or decision in favour of the provider of bribe, in order to acquire undue advantage over others. This may be in the form of money, gifts, favours, promises, use of company resources or other items with little or great value.

Kickback - Considered as a form of bribery or corruption, whereby a party representing the Company and a third party (e.g. supplier) agrees that a portion of sales or profits will be divided (kicked back) between the two agreeing parties for any deals or transactions that are closed.

Facilitation Payment - In some countries, “facilitation payments” are being practiced such as payments to government officials to expedite the process of documents or taking some action in favour of the Company, including issuance of visa, work permits, licenses etc. Natural Habitats and its subsidiaries strictly prohibit facilitation payments and will not allow third parties acting on behalf of the Company to make any payments to support this act.

CONFLICT OF INTEREST

In any business decision, all employees must strive to consider what is best for the Natural Habitats and its subsidiaries, taking into account that any form of conflict of interest may damage the reputation of the Company and its subsidiaries.

Conflict of Interest arises when an individual is, or could be, influenced or appears to be, by a personal interest compromising obligations or professional duties. Natural Habitats and its subsidiaries' interest must always be safeguarded through effective performance of roles and professional duties.

No employee shall engage in any transaction for personal gain or for the gain of others using any resources of the Natural Habitats or its subsidiaries.

No employee shall use and divulge any information that is not available to the public or any information acquired as a result of the services to the Natural Habitats or its subsidiaries, for the purpose of personal gain or influence.

Full and timely disclosure of any actual or potential Conflict of Interest is required to ensure prompt investigation and resolution. Employees are encouraged to discuss with their Department Heads any real, apparent or potential Conflict of Interest.



FRAUD AND DISHONESTY

In order to achieve the highest standards of ethical behaviour, all employees shall not engage, participate directly or indirectly, in fraudulent or deceptive business practices, which may sometimes be concealed and deliberate. Internal fraud can occur in any department or country and in many ways and can put the business operations at risk.

Fraud, dishonesty or any relative criminal activity is strictly prohibited by the Company. To combat fraud, dishonesty and other criminal activities, Natural Habitats and its subsidiaries shall adopt effective safeguards for any suspected or attempted fraud, including unexplainable disappearance of funds or company resources, by means of immediate reporting.

MONEY LAUNDERING AND TERRORISM

Money laundering is a process by which one takes proceeds from a criminal activity and hides the origin of the unlawfully gained money, making the funds appear to be legitimate. In order for the proceeds to be undetected, money or assets may be placed into financial systems, moved around multiple accounts or companies and integrated into various assets.

Natural Habitats and its subsidiaries shall take reasonable steps and establish procedures to prevent and detect any payment which may be inappropriate or suspicious. Further, the Company shall conduct business only with reputable and legitimate customers, suppliers, contractors and business ventures.