



# Code of Conduct

How we shall behave in our everyday business

Revised (20 February 2020)

Successful companies stand the test of time. New Nordic knows this well.

Our company excels in nurturing the value of the New Nordic brand and the products carrying our “silver tree” mark, continuously heightening their power to attract consumers with superior solutions to health problems.

Equally important for long-term success is our unyielding commitment to strong values in terms of ethics, social responsibility and respect for the environment. As actors in economic and social life, we are called to the highest standards of integrity, respect, and engagement in our behavior, every day, everywhere. Everything we do, we do with care for people and nature.

Today, we have taken another important step forward. The Code of Conduct we are officially adopting provides a set of simple principles and behavior that should guide the New Nordic Group and each of us in the everyday conduct of business.

New Nordic has a global dimension and the world in which we do business is changing at a rapid pace. In the context of this continually evolving business environment, this Code of Conduct constitutes a common benchmark to guide individual initiatives and ensure greater consistency in practices across New Nordic’s companies and geographies.

My expectation is that all of our companies and people will embrace this Code of Conduct as the best way to support our business and fulfill our sustainable development responsibilities.

Marinus Blaabjerg & Karl Kristian Jensen

## A VOCATION

Our heritage is deeply rooted in the Scandinavian way of living. We value outdoor healthy living, natural materials and the vitality bringing benefits of natural elements. We live with integrity. We teach our children to become good citizens that are honest, trustworthy and do their best to bring value to society. We think long term. We build lasting relations and take decisions for the long-term benefits for everyone. We care for the long-term state of our planet and we live a pure life.

New Nordic aims to be the undisputed Scandinavian leader of herbal natural health and beauty products. Our growth and long-term future are based on values and principles which are part of our culture and which should inspire and guide everyone's actions.

This ambition is backed up by the ten fundamental values. Our values help determine our behavior and should be carried right through to the suppliers, to the customers and to each other. The values should be shared by everyone involved in New Nordic:

- Joyful: because to be with someone who smiles at you, is positive, and take difficulties with good mood feels good and makes every day a better day.
- Trustworthy and honest: because is fundamental in the "New Nordic culture", and behavior towards colleagues, customers, and suppliers.
- Frugality and decency: because waste, wastefulness and sloppiness destroy the company's finances and reputation
- Alertness: because being able to see problems arising at an early stage and taking action against them immediately without waiting makes thing so much easier for all
- Creativity: because our future success will come from the renewal of our product offering while respecting the roots of our Scandinavian heritage.
- Simplicity: because we eliminate the unnecessary in our products and business routines in order that the necessary may speak.
- Excellence: because we represent what is the most relevant and effective products in the world.
- Passion: because our brand and products represent an extraordinary asset, a source of dreams and hope to maintain vitality, health and joy year after year.
- Entrepreneurship: because this guarantees our ability to react and our motivation to create and seize opportunities.
- Winning attitude: because it is through continually excelling and expressing a winning attitude that we accomplish the best and achieve the best results.

The principles set out in the following Code of Conduct constitute an ethical and practical framework within which New Nordic employees are invited to act and exchange in order to realize the passion that binds them.

Respect for national and international laws, regulations and rulings, notably in the area of social and environmental legislation, is a prerequisite for the credibility of our procedures. New Nordic invites its employees to use in a responsible way, the values and principles hereby stated.

Finally, this Code of Conduct sets out to serve as a common base and source of inspiration. It unites the fundamental principles which represent our shared commitment and serves as a guide for our professional conduct on a daily basis. It evokes the principles of conduct that drive us.

## VALUING TALENTS

### Enriching our talents

New Nordic encourages a diversity of profiles and backgrounds in order to promote its international image and to combine creative energy within our team.

New Nordic recognises the richness of talents and know-how of the men and women in the Group. It is careful to ensure equality for all its employees in the area of employment and development, providing equal opportunities on objective criteria. Gender equality is a key aspect of its equal opportunity policy. All forms of discrimination are prohibited.

### Encouraging personal development

New Nordic offers its employees a fulfilling working environment in order to encourage trusting and collaborative relationships.

New Nordic, therefore, specifically:

- encourages loyalty and mutual respect in professional relationships;
- does not accept any form of discrimination or harassment;
- does not accept any form of physical violence, or verbal or psychological harassment;
- respects employees' private lives.

New Nordic promotes for all employees the respect of a good balance between personal and professional life.

### Encouraging initiative

New Nordic encourages individual responsibility in its employees, which goes hand in hand with the creativity and initiative expected from individuals.

To this end, New Nordic values:

- a high level of impartiality in inter-personal relationships;
- management by example;
- that employees demand of themselves the highest levels of quality in the execution of their work;
- a good balance between initiative and the limits of professional expertise and responsibilities.

Between employees concerned by a same event, function or mission, as well as towards hierarchy, New Nordic prohibits any deliberate indiscretion, withholding of information, denigration or refusal to collaborate.

### Maintaining and developing employment

- New Nordic encourages ongoing training and personal development.
- New Nordic develops category-specific know-how through training initiatives.

- New Nordic promotes the development of young talent within the Group, notably through education, integration, training and mentoring.
- New Nordic complies with national regulations and legislation in the area of employment for the disabled and participates in initiatives which encourage their integration into the workplace.

#### Respecting fundamental rights and principles in the workplace

New Nordic respects and defends fundamental rights and principles in the workplace, namely:

- elimination of professional and employment discrimination;
- freedom of association and effective recognition of the right to collective bargaining;
- elimination of any form of forced or bonded labour;
- effective abolition of child labour.

#### Promoting dialogue with employee representatives

New Nordic encourages quality dialogue and consultation with employee representatives as well as the respect and consideration for employee representatives in each of the countries where it has a presence.

#### Looking after health and safety in the workplace

New Nordic cares about the health and safety of all its employees, makes sure that all its activities respect current health and safety legislation and regulations and pays particular attention to implement best practice with regard to safety in the workplace.

## WINNING THE TRUST OF CUSTOMERS

#### Sustaining the quality and safety of products

New Nordic is continuously looking to offer its customers products of the highest quality, through improvement and innovation and the highest of standards in the selection of materials and the implementation of expertise in its activities.

New Nordic cares about the health and safety of its customers, notably in accordance with the precautionary principle, in the development and manufacture of its products.

#### Respecting customers

New Nordic is committed to supplying its customers with sincere and clear information and to not making any misleading statements concerning its products and their methods of production.

New Nordic is careful that personal information submitted by its customers is treated with confidentiality.

#### Responsible communication

New Nordic is aware of the impact on society of its products and their image. New Nordic is therefore committed to the highest levels of vigilance in the advertising of its products by implementing responsible communication which encourages its customers to use its products in an appropriate and reasonable manner.

## COMMITMENT TO THE PRESERVATION OF THE ENVIRONMENT

New Nordic acts to protect the environment, fighting climate change and preserving resources. New Nordic wants dynamic and continuous improvement of the environment for the benefit of its customers, employees and society in general. In this perspective, the “Environmental Program” and “Jungle Farming” was introduced in 2008. It is always New Nordic’s ambition to go beyond regulatory prescriptions, responding to society’s concerns, investing the necessary human and financial resources. In all countries, the products propose measures, which aim to protect the environment in accordance with international standards in force and the best practice of the sector.

### Promoting collective commitment

New Nordic, through all of its products, employees and partners, is committed to continuously improving its practices with a view to maintaining the highest level of environmental performance.

New Nordic develops, with its partners, a spirit of cooperation in the face of environmental problems. It participates with third parties in the production of studies and initiatives to develop innovative solutions.

### Preserving natural resources and biodiversity and integrating the environmental dimension into products

New Nordic recognises that the long-term future of its brands and products is based on a constant desire to preserve and respect natural resources, the main raw materials of a large number of its products.

New Nordic develops manufacturing processes which consume fewer natural resources and less energy throughout the product life cycle.

In addition to an ambitious greenhouse gas reduction target, New Nordic encourages the use of renewable energies and is actively involved in Jungle Farming biodiversity projects to neutralize greenhouse gas, save endangered plant species and biodiversity.

### Anticipating environmental risks

Through scrupulous monitoring and the application of the precautionary approach, New Nordic is careful to manage its environmental risks through strict respect of the best practices.

## IMPLEMENTING AND PROMOTING A RESPONSIBLE APPROACH

### Responsible behaviour towards partners

New Nordic is committed to maintaining equitable and loyal relationships with its partners (suppliers, distributors, subcontractors, etc.).

New Nordic will inform all of its commercial partners of its ethical principles and expectations. New Nordic asks its suppliers to comply with the principles set out in the Suppliers’ Code of Conduct. This code specifies the demands in the areas of social issues (forced labour, child labour, harassment, discrimination, pay, working time, freedom of unions,

and health and safety), environmental and operational issues (legality, custom tariffs, safety, subcontracting and corruption).

#### Fighting against corruption

New Nordic prohibits any form of corruption. Any payment must reflect a service and legitimate price as described in the contracts and agreements.

New Nordic only authorises gifts and invitations in the usual social and commercial situations.

New Nordic is committed to operating independently in public life. New Nordic prohibits the payment of money to political parties, trade unions or cultural organisations in an attempt to promote a particular interest or obtain or maintain an advantage.

#### Respecting competition

New Nordic is concerned about preserving fair competition respecting laws and practices in force, without any interference with competition rules.

New Nordic prohibits any unlawful agreements, notably through understandings, projects, arrangements or behaviours, which have been coordinated between competitors concerning prices, territories, market shares or customers.

#### Preventing conflicts of interest

All employees can find themselves confronted with situations in which their personal interest, or that of private individuals or corporations with whom they are linked or close to, can come into conflict with the interests of the

Group. Employees must, when taking stakes in other companies and in their activities outside the Group, do everything possible to avoid finding themselves in situations of conflicting interests with New Nordic or any other linked company.

In this matter, it will be the employee's responsibility to determine a course of action in all honesty and taking into account their duty of loyalty towards New Nordic, and if in doubt to consult their line manager. The employee must notify all conflicts of interest in writing.

### ACTING AS A SOCIALLY AWARE COMPANY

New Nordic believes that in order to succeed a company must show responsibility in relation to the major challenges of its human environment and must translate this success into useful and constructive commitments.

#### Respecting and supporting human rights

New Nordic respects and promotes human rights and makes sure that its activities do not encourage human rights abuses. New Nordic intends to reflect its attachment to human rights through exemplary behaviour in the operation of its business and to encourage, within its sphere of influence, the improvement of social conditions which constitute an essential factor in economic development.

#### Demonstrating active solidarity

New Nordic's behaviour respects the cultures of all the countries in which the Group has a presence. New Nordic is keen to promote the best of local culture and creativity.

## WINNING THE TRUST OF SHAREHOLDERS

### Respecting shareholders

The rights of New Nordic shareholders are protected by law and the principles of corporate governance, which govern the way the Group operates.

The New Nordic Board of Directors has a Charter, which specifies, among other things, its composition, missions, operations and responsibilities.

The New Nordic Board of Directors:

- ensures, that the Group's accounting principles comply with the standards in force, reviews the corporate and consolidated financial statements and monitors effective implementation of the Group's internal control.
- proposes the remuneration of directors and provides advice on candidates and remuneration for key positions of the Group respecting applicable legislation and governance principles.

### Ensuring the transparency of financial information

New Nordic is committed to ensuring the simultaneous, effective and complete dissemination of financial information which is relevant, accurate, true and fair, disseminated in a timely fashion, and consistent with previous publications. Only designated personnel are authorised to give information to the financial market.

New Nordic is committed to accurately reflect its operations in its accounts.

### Preventing insider trading

Any employee who, due to their professional activity, has access to privileged information which could influence the Group's share price or that of another company is bound by absolute confidentiality and is prohibited from buying or selling shares in this company (or any financial instruments that are linked to it) or from doing so through a third party so long as this information is not in the public domain.

### Maintaining the Group's heritage

New Nordic ensures that each employee uses the Group's resources appropriately.

These resources include notably New Nordic's intellectual property, equipment, goods and financial resources.

New Nordic is careful to protect any confidential information, within or outside the Group.

New Nordic defends its heritage and know-how by combating counterfeit. The Group does everything in its power to protect its intellectual property rights using a strategy to fight counterfeit, which is focused on prevention, information and communication. In addition to these initiatives, it is the responsibility of each employee to defend New Nordic's heritage.

### Principles of implementation

This Code of Conduct aims to ensure the effectiveness and fairness of New Nordic's operations. This Code, distributed throughout the Group, must be understood, accepted and applied consistently within the country business groups and the brands.

This Code and its principles, which should not be considered exhaustive, must be respected by each employee, and each business group of New Nordic.

The New Nordic Code of Conduct serves as a basis for the drawing-up of codes of conduct at brand and business group levels, adapted to their context and their sector. Thus the principles of this Code can, when appropriate, be developed or specified in relation to local regulations and legislation, and, when they exist, locally applied charters or codes.

#### Resources to support implementation

The functional departments of the Group, each in their respective area, will support the brands in the implementation of the Code of Conduct with a view to a consistent and uniform application of its principles.

New Nordic encourages the sharing of experiences and best practices throughout the Group, this being a source of progress for everyone.

#### Responsibility for implementation

The Board of Directors of New Nordic, to which the Executive Management of the Group submits each year a report on the implementation of the Code's principles, will be the body which ensures its correct application.

In accordance with the principle of subsidiarity inherent to New Nordic, the executive management team of each operational and legal entity is responsible for compliance with the principles of this Code. Any employee who notices a non-conformity to one of the principles stipulated within the Code should inform his or her hierarchy.

#### Verification of implementation

Verification of compliance with the Code of Conduct is incorporated into the internal control mechanism existing within New Nordic and follows the procedures in force in the Group.