

NATIVE UNION



CODE OF ETHICS AND GOOD CONDUCT



EDITORIAL signed by Igor Duc - CEO

Beyond the creativity, innovation, and modern ways of working behind the success of NATIVE UNION since its founding in 2009, the introduction of a Code of Ethics and Good Conduct shows our dedication to upholding high standards of integrity and professional skills, and to respecting national and international regulations.

We are grateful for the trust and recognition that both our partners and clients have shown to us and our products in these last ten years.

Developing our operational excellence may only be achieved through our respect of high standards of integrity. Maintaining compliance and ethical behaviour is a priority, not only in the interest and reputation of our company, but also in the protection of us all.

Acting according to the values of NATIVE UNION ethically and with integrity, competence, diligence, and respect, everywhere and every day, is the basis of the requirements set out in this Code of Ethics and Good Conduct. This is expected of us all.

The present Code defines the foundations on which NATIVE UNION wishes to develop, and allows each of us to reflect on how we should react in any unusual or sensitive situations that may arise.

The Code of Ethics and Good Conduct is a tool to guide you in your daily work with NATIVE UNION. It defines the responsibility of the company as well as that of each person as an employee or individual. Misconduct may, in certain cases, have serious consequences not only for our company but also for us as employees.

NATIVE UNION therefore counts on each of us to always act responsibly and with integrity at both a professional and personal level.

Igor Duc - CEO





REMEMBER!

- ✓ This “Code of Ethics and Good Conduct” is to help you respect laws, rules, and procedures on a daily basis.
- ✓ The present Code outlines the standards we set for our employees and our partners (suppliers and customers).
- ✓ The Employee Handbook (signed by all NATIVE UNION employees) outlines the culture, general policies, and benefits at the company.

TO WHOM DOES THE CODE OF ETHICS AND GOOD CONDUCT APPLY?

Any person working for Design Pool Limited (including its subsidiaries and affiliates), hereafter referred to as “NATIVE UNION”, whether directors, managers or ordinary employees, part-time or full-time, temporary or in training, in Hong Kong or in one of our subsidiaries abroad, must be aware of, apply and respect the present Code, and comply with all laws and regulations of the countries in which NATIVE UNION works or carries on activity.

NATIVE UNION counts on each of you to act with full integrity. It is better to let go of business than to break the law or rules. Your personal commitment to the following is essential for everyone:

- Learn the values, principles, and legislation, and act in accordance with them;
- Take on board your own responsibilities and make others aware of theirs;
- If you have any doubts or questions, do not hesitate to approach your

manager and ask for advice from the Compliance Department;

- Tell your manager or Compliance Department if you have any concerns;
- At all times, act transparently and ethically.

NATIVE UNION also expects that its suppliers, distributors, and other partners will commit to the above. They are therefore asked to respect the laws and regulations applicable to their activity and in the country in which they are working. This can be achieved through

a contract but it is up to each of us to remind our partners of the principles that govern our business.

REMEMBER!

- ✓ Acting with integrity and respect for the present Code is the responsibility of EACH and EVERY person, regardless of their position within NATIVE UNION.

RESPECT FOR OTHERS

Respect, communication, well-being, and personal development are key to maintaining a positive working environment for all.

Diversity, a source of creativity and innovation

NATIVE UNION is proud of those who work with us, their daily involvement, and their diversity.

Thanks to this diverse pool of talents, energies, cultures and skills, NATIVE UNION has strengthened over the years and continues to reinforce our innovation, image, and competitive edge.

For this reason, NATIVE UNION undertakes and commits to:

- Enhancing and developing the motivation and performance of those working with it;
- Favoring exchanges and the birth of new ideas;
- Cultivating a spirit of initiative;
- Developing communication and transparency.

Equal opportunities

NATIVE UNION gives each worker or applicant a fair chance and takes account only of skills, experience, or professional aptitude, whether:

- During recruitment;
- When given access to training;
- With regard to payment;
- Concerning social protection;
- In terms of internal mobility;
- In terms of career development.

All forms of discrimination are prohibited, be they based on:

- Race;
 - Color;
 - Ethnic origin;
 - [Religious] Beliefs;
 - Ancestry;
 - Gender;
 - Sexual orientation;
 - Age;
 - Identity;
 - Origin;
 - Disability;
 - Trade union affiliation;
 - Pregnancy;
 - Military service;
 - State of health;
- or any other characteristic protected by current laws.

Respect, Benevolence and Courtesy

Respect, fairness, and consideration for all form part of our daily lives. Maintaining courteous relations with our colleagues is vital both for us and for others, and is crucial to developing a positive working environment.

No harsh or disrespectful treatment is tolerated. Physical abuse or discipline, verbal abuse, the threat of physical abuse, sexual or other harassment, or any other forms of intimidation are prohibited.

REMEMBER!

- ✓ Equal opportunities, non-discrimination, respect, consideration, and courtesy are essential.

Q&A

One of your colleagues suggests taking on an applicant who he thinks satisfies all of your criteria. He has only sent you that person's resume with no photo. When faced with the applicant, you realise that he has a particular sexual orientation. Although the interview is a success, you decide not to appoint the applicant purely because in your opinion, others in your department could react negatively. Is this the right decision?

No: each person has the right to equal opportunity, provided they fulfil the professional criteria set. It's your responsibility to remind your team of the non-discrimination and equal opportunity rules, and of the requirement to respect this Code.



CONFIDENTIALITY AND PROTECTION OF SENSITIVE INFORMATION

Today, in both our private lives and at work, we have access to varied information. Some of this information concern our colleagues, company, products, strategy, and assets, and those of other companies we interact with.

While we are free to obtain information from public sources (websites, published articles, advertisements, brochures, presentations...), we must ensure that the business's unpublished assets, information and resources are protected, even if there is no formal confidentiality obligation.

What is sensitive and confidential information?

Sensitive and confidential information is information that is of great value to the business and could, if disclosed even accidentally or unintentionally, adversely affect its future. All information that is not public is by nature secret, and must be protected.

NATIVE UNION's competitiveness is therefore based on the protection of its sensitive and confidential information of a commercial or technical nature unknown to its competitors.

The term "sensitive and confidential information" also applies to information that relates in particular to:

- Products' forecast;
- Price lists;
- Supplier contacts;
- Financial results;
- Acquisition or disinvestment projects;

- Ongoing proceedings and litigation;
- Agreements signed with third parties.

Maintaining secrecy prevents fraudulent use, damages, misappropriation, abuse of trust, malicious actions or unfair competition, and actions such as counterfeiting and industrial espionage.

Any situation in which you are planning to distribute information internally and especially outside the business, even if you are acting in the context of business relations already established with a third party, must be carefully examined.

Ask yourself these questions:

- how is the information defined;
- what benefit would circulation bring;
- in what context is it being circulated;
- and to what extent is the circulation of the information protected (confidentiality agreement, contract ...).

If there is any doubt, contact the Legal Department. Authorised communication must be strictly limited to persons required to know the confidential information.

Information obtained from other businesses may only be used ethically and in accordance with confidentiality laws and obligations.

Do not look for, or ask a third party to use illicit or unethical means (false declarations, theft, corruption, espionage, fraud) of obtaining information, whether for your benefit or for that of the company.

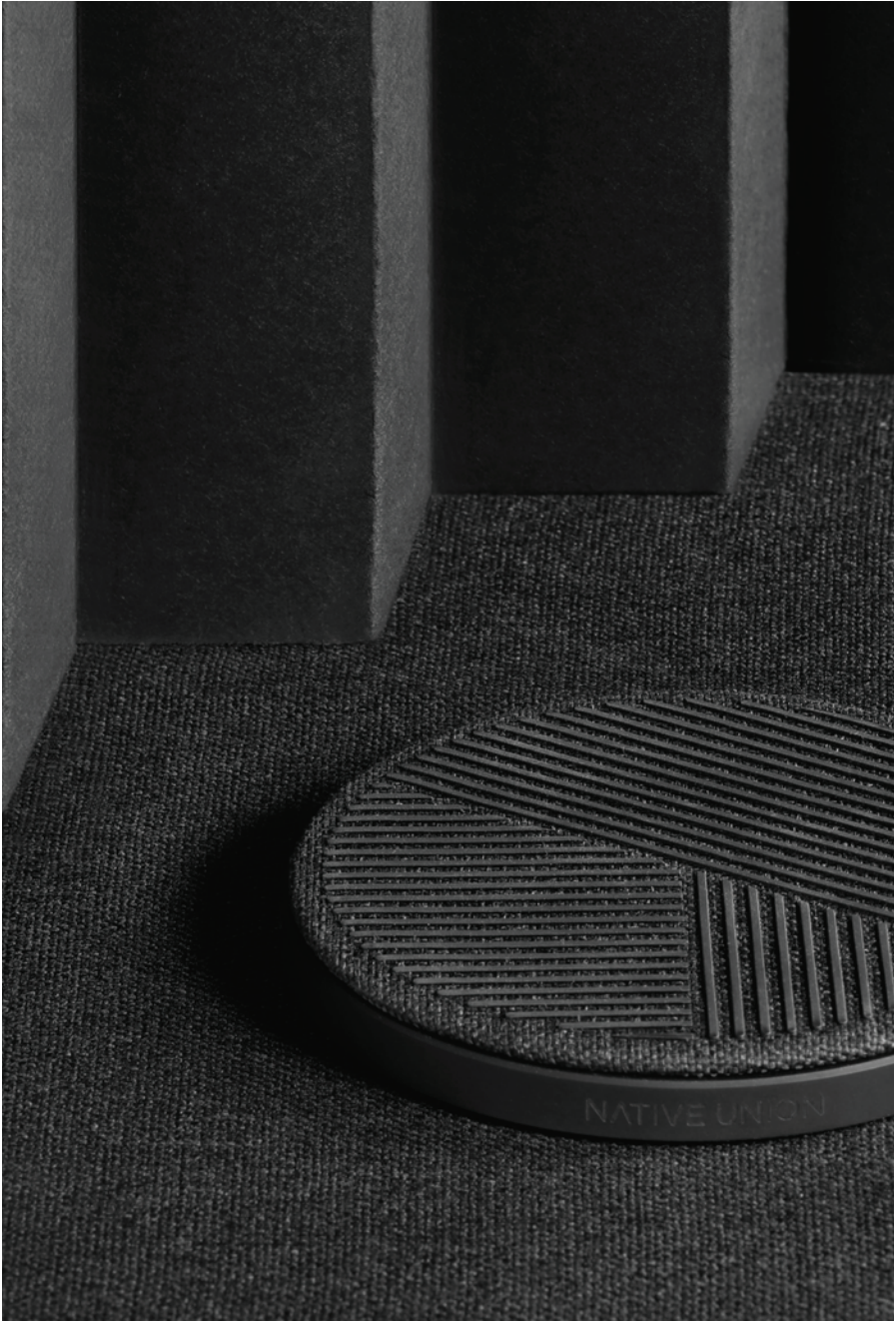
Similarly, be suspicious of any informal request from outside persons that you may receive by e-mail or phone, and keep aware of all information shared electronically and the way you share that information.

When you travel, eat away from the company, and more generally do not discuss confidential information in any public place.

Remember, these confidentiality obligations remain in force even after you have ceased working for NATIVE UNION, in accordance with the confidentiality clauses either in your Employment Agreement or in the Proprietary Information and Inventions Agreement.

REMEMBER!

- ✓ Do not circulate confidential information internally or externally without prior authorisation.
- ✓ Be vigilant during conversations, or when consulting documents in public places.
- ✓ Take advice from the Legal Department if there is any doubt about confidentiality of information.
- ✓ Be aware of your confidentiality obligations during and after your employment.



Q&A

While you are in charge of Logistics, you take a direct call from someone claiming to be an intermediary whose client is very interested in your latest product. He asks you if the product is available in the UK and where the raw material originates from. How should you answer?

Ask for the name and number of the person contacting you and say that you are not qualified in this subject, but will redirect his request to the relevant department. Immediately inform the Sales and Legal Departments of this unusual request; it may be an attempt to obtain information unfairly.

CONFLICTS OF INTEREST AND POLITICAL SUPPORT

1. Conflicts of interest

The professional interests of an employee and the private interests of any individual person or legal entity in their circle of acquaintances, may sometimes be in conflict with the company with which the employee works. This is known as a conflict of interest.

In order to prevent problems arising and the company's reputation from being undermined, each of us must always take care not to generate, or find ourselves in a situation that could lead us to lose our objectivity in making professional decisions.

For example, one of your relatives may have private interests linked to NATIVE UNION's activity. It's your responsibility, once this link is identified, and in order to prevent the objectivity of the decision taken by the company to enter into a business relationship with your relative from being disputed, to inform your manager of this link before any decision is taken, and to refrain from involvement in the decision-making process.

You are also reminded that you have agreed to work only for the company. Should you wish to carry out any ancillary activities, this must be subject to the prior formal agreement of the company.

If you wish to invest in a competitor, client, or supplier (unless acquiring shares in a listed company), you must inform the Finance Department straight away in order to prevent this from altering your objectivity when you commit to the company.

Refuse politely but firmly any offers of gifts, invitations, or other non-symbolic benefits (as defined in the Company's Gifts policy) that may give you a sense of owing something, and thus lead you to lose objectivity in future decisions.

2. Political support

Similarly, any political activity or demonstration must be carried on outside the context and working hours of the company. Employees are formally prohibited from committing the company by using its equipment, premises, funds, resources, name, and image for personal political activity.

In addition, NATIVE UNION does not authorize its employees or representatives to commit it directly or indirectly by using its name and image for support purposes or political activity. Similarly, the company's financial resources may not be used to support either directly or indirectly a political party, candidate, or activity at any level in Hong Kong or abroad, unless the Chairman of the Board of Directors expressly authorises it.

REMEMBER!

- ✓ Avoid conflicts of interest or situations likely to place you at odds, so that you can remain objective when making any decisions.

Q&A

Your spouse has a graphic design company and is seeking new clients. You know that your company wants to redesign marketing collateral for a product whose promotion you are responsible for. You inform your spouse, who decides to make a proposal without disclosing your relationship. What should you do?

It is preferable for you to inform the decision-making person in your company of your familial link so that this business relationship cannot be contested. If the terms of your spouse's proposal meet the company's criteria, it may be accepted according to the procedure in place, and completely objectively.

FREE COMPETITION AND COMPETITION LAW

Free competition between businesses is protected by a whole series of competition laws which, if violated, could give rise to sanctions that vary from fines, damages payments, and prison sentences.

This may involve illegal arrangements to fix prices, conditions of sale or distribution of contracts, exchanges of information between competitors, discrimination, or boycotting of suppliers.

If we are in a dominant position in the market, we must not seek to exclude our competitors or exploit our clients.

The following are thus prohibited:

- Agreements and contracts with competitors relating to, among other things, prices, conditions of sale, product information, contracts, financial information, competition or agreements with third parties (clients or suppliers).
- Exchanges aimed at boycotting clients or suppliers, limiting business, or excluding competitors. More caution should be taken during meetings between partners or industrial concerns, even if these are organized for legitimate or useful purposes. You may be required to discuss problems of common interest and possibly cross the line of non-compliance with the obligations of competition laws.

REMEMBER!

- ✓ Ensure that you do not conclude agreements, or make contacts with clients which could be construed as anti-competition or discriminatory.



Q&A

At a trade show abroad, you meet a competitor with whom you are in litigation over a design infringement issue. The competitor proposes stopping the current proceedings and reaching an agreement aimed at delaying your product's launch. To do that, he proposes paying you a total equal to the anticipated turnover for the period during which you make no sales. Can you accept this offer?

This type of agreement is strictly prohibited under anti-competition laws. You are therefore advised not to accept.

ANTI-CORRUPTION AND TRADE SANCTIONS

1. International regulations against corruption and corruption as a criminal offense

The practice of certain companies and individual persons with the aim of offering or obtaining unfair advantages have, for several years now, led to reinforcement of national and international regulations to prevent or punish bribes and corruption.

These regulations come from international (United Nations Convention, OECD Anti-Corruption Convention) and national legislations (US Foreign Corrupt Practices Act (FCPA), UK Bribery Act, the Hong Kong Prevention of Bribery Ordinance (POBO), the Anti-Unfair Competition Law of the PRC) and apply within the framework of professional, commercial and private relations.

The term "corruption" covers all forms of behavior that are unethical or unlawful.

The payment of bribes or other illicit favors is a form of corruption that involves the offering, promotion, giving, acceptance, or begging, either directly or indirectly, of an unfair and illegal advantage.

NATIVE UNION expects that its employees will not practice the following in any circumstances, either directly or through a third party acting for and on behalf of companies or individual persons:

1. Active corruption, which involves offering or promoting to:
 - A public servant;
 - A police officer;
 - Politicians or political parties;
 - Or any other individual or legal entity; any money, gift, loans, commissions, offices, contracts, services, favors or other undue advantage in order to

incite these persons to carry out (or not carry out), within their duties, an act that could be facilitated because of their position (see diagram below, part A).

2. Passive corruption, which involves begging or obtaining offers or promises of money, gifts, services or any other unfair advantage with the aim of carrying or not carrying out an act within the framework of their duties or likely to be facilitated because of their position (see diagram below, part B).

3. Do not forget that corruption is a dual offense (see diagram below, parts A and B): criminal or civil sentences can be passed on both parties. In other terms, even if you are not the one making an offer, your acceptance may be considered as an offense.

4. Refer to the Gifts Policy when giving and receiving gifts and contact the Compliance Department at compliance@nativeunion.com if you have any questions.

Do not forget that criminal or civil sentences can be passed both on individual persons and on businesses. Corruption, or allowing oneself to be corrupted, can lead to the imposition of severe fines, and, in some countries, prison sentences.

Acts of corruption committed within a NATIVE UNION subsidiary or in a country other than Hong Kong with whom we have business relations, may also result

in a sentence being passed in Hong Kong, where our head office is located, in the country in which our subsidiary is located, as well as in the country in which we have acted.

In addition to fines and prison sentences, corruption can have a serious negative impact on a commercial level and severely damage the image and reputation of our company.

Corruption : a dual offense



REMEMBER!

- ✓ Do not accept or offer any unfair advantages to obtain any improper business advantage.
- ✓ Do not do business that compromises your integrity.
- ✓ You are the guarantor of NATIVE UNION’s reputation.
- ✓ Inappropriate conduct could lead to severe sanctions, both for the company and for you.

Q&A

To express thanks to a Chinese agency that has helped facilitate selling our products in China, can I encourage NATIVE UNION to take on the manager’s son for paid training in Hong Kong?

This poses risks for both the company and yourself. If the link between obtaining the certification and the presence of the manager’s son within the company becomes known, NATIVE UNION’s activity may be called into question and its reputation damaged. NATIVE UNION (and yourself in some cases) may be subject to sanctions locally or in Hong Kong.

GIFTS AND ENTERTAINMENT

Business gifts and entertainment on a modest scale are commonly used to build goodwill and strengthen business relationships. Providing or accepting occasional meals or tickets to sporting and cultural events may be appropriate in certain circumstances.

Occasionally, it may also be appropriate to accept or provide offers involving travel for business events with our business partners. However, if offers of gifts or entertainment are frequent or of substantial value, they may create the appearance of, or an actual conflict of interest or illicit payment. NATIVE UNION employees are advised to exercise extra caution in relation to gifts for public servants.

NATIVE UNION has developed a Gifts Policy to help employees make the right decisions when providing or accepting gifts or entertainment while conducting business. Please refer to the Gifts Policy.

Ask yourself the following questions upon offering/accepting gifts or entertainment:

- Does it fall within the acceptable value of gifts (as defined by the Gifts Policy)?
- Does it serve a clear business rationale? Is it reasonable, ordinary and appropriate?
- Does it remain fair and impartial to all NATIVE UNION's suppliers, customers or other business partners?
- Would it embarrass NATIVE UNION or the gift giver if disclosed publicly?

NATIVE UNION will never permit employees offering or accepting gifts involving:

- gifts of cash, gift cards, or gift certificates;
- gifts intended as a bribe, payoff, or kickback (e.g., in order to obtain or retain business, or to secure an improper advantage);
- gifts the recipient knows are prohibited by the gift giver's organization; and gifts given in the form of services or other non-cash benefits (e.g., the promise of employment);
- gifts that are prohibited by local law.

Please keep in mind that gifts and entertainment may have legal repercussions for the employee and/or NATIVE UNION as a company.

REMEMBER!

- ✓ NATIVE UNION employees must never ask for/accept gifts, gratuities or other items above US \$50 that benefit them personally.
- ✓ Employees are expected to exercise good judgment in offering/accepting gifts from suppliers, customers or other business partners.
- ✓ Employees need to follow the Travel Expenses SOP and Gifts Policy.
- ✓ Employees should talk to their supervisor when in doubt as to whether a gift is appropriate.

Q&A

You are visiting a distributor to discuss business expansion projects in his assigned territory. While having lunch, he proposes to pay for a private trip for you and your significant other to show his “gratitude” for the way you have been handling this account for many years. After making this offer, he hints that you should consider expanding in the countries where he would sell your products, as well as the channels where the products would be sold.

You are strongly advised not to accept. This trip may appear as a personal favor as your significant other is also invited, but it has a high chance of impacting your professional judgement concerning the potential of this account. This trip does not respect any of the following conditions: (a) falling within the acceptable value of gifts, (b), serving a clear business rationale, and being reasonable, ordinary, and appropriate, (c) remaining

fair and impartial to all NATIVE UNION's suppliers, customers, or other business partners, (d) not embarrassing NATIVE UNION or the gift giver if disclosed publicly.

IMAGE AND COMMUNICATION

1. Use of means of communication

Nowadays everyone has access, either professionally or personally, to many new communication tools. These tools may be internal to the company or open to everyone via the internet.

These tools include social networks such as Facebook, Instagram, LinkedIn, Twitter, YouTube, Snapchat, Flickr, and forums or Wikis. For some of these networks or forums, content can be altered and made accessible to anybody, in any place and at any time.

It is therefore essential, in the interest both of NATIVE UNION and of individuals, to use these platforms responsibly and check carefully what we publish, even in a private situation. The wording may not contain anything insulting or be political, religious, sexual or racist in content, and nothing may be said about your colleagues' opinions of the company, its partners, or competitors.

Each of us are accountable for what we publish on social media. What we say may be attributed to the company and have negative repercussions on the reputation and image of NATIVE UNION.

Refer to the Company's IT Charter on IT security and the use of means of communication.

2. Institutional communication

Only the company's communications department and certain authorized employees are allowed to report for the company on its activities.

Any unsupervised communication could be damaging to the future of the company (for example, announcing a new contract when it has not been signed, speaking of a potential acquisition especially when one of the companies is quoted on the stock exchange, expressing an opinion on a conflict or accident...).

Refer all requests for information or interviews to the Marketing Department and inform your immediate manager.

No communication on Company's financials is allowed without prior permission of the CFO. No communication on Company's legal matters (including any type of disputes with third parties, regardless of the stage of the proceedings) is allowed without prior permission from the Legal Department.

REMEMBER!

- ✓ Use means of communication and social media responsibly.
- ✓ Do not report on the company or its activities without prior authorization.
- ✓ Refer all requests for communication to the appropriate department.

Q&A

At the company's Christmas Dinner, we took some photos of colleagues. Some of these are highly amusing and I want to post them on my Facebook profile. Do I have the right to do so?

You are advised not to post without prior consent of all people in the photos. If you have any doubts, consult the Legal Department.

RELATIONS WITH SUPPLIERS

1. General guidelines

Before entering into commercial relations with a supplier, it is advisable to find out their reputation and ensure that it complies with all legal and conventional provisions and behaves ethically.

The supplier will also be asked to:

1. Respect current laws and regulations in the field of manufacturing, safety, and the environment in order to guarantee protection of personnel, the quality of the sites on which it pursues its activity, and therefore the quality and compliance of the services.
2. Respect all the specific laws and regulations applicable to our industry during the manufacturing of products or realization of services.
3. Respect the fundamental principles of the Work Organisation Convention by not, among other things, resorting to child or forced labor and by ensuring equal of treatment and opportunities for every staff member.
4. Informing NATIVE UNION of any conflict of interest likely to affect our relations before entering a relationship with us.
5. Respect current anti-corruption laws in its country, and confirm this undertaking by agreeing to insert ad hoc clauses into the contracts signed with our company.

We encourage initiatives to reduce the

impact on the environment, particularly through the use of environmentally-friendly technologies.

It is your responsibility to carry out an assessment of all new suppliers prior to any undertaking and to verify periodically that the current suppliers are complying with laws, codes and procedures.

It is also your responsibility to inform our suppliers of, and make available to them, the full range of our company's procedural documents with which we expect our suppliers to comply (one of the documents is the present Code).

We reserve the right to check adherence to these principles and to conduct compliance audits at any time without notice. The supplier shall keep proper records to prove compliance with this Code. Our suppliers shall provide access to complete, original, and accurate files to our representatives.

2. Relationship with suppliers in China

It is particularly important for any NATIVE UNION employee who has an ongoing relationship with suppliers in China to be aware of the legality of cash or other benefits.

China's anti-corruption legal regime is primarily regulated by the Anti-Unfair Competition Law of the PRC ("AUCL"). Any forms of bribery are unacceptable under the AUCL. There are no financial thresholds, since it is expressly prohibited. Particularly large forms of bribery will be caught under criminal law.

On the scope of bribery, Article 7 of the AUCL directly targets employees,

ie individuals delegated to handle the transaction or have influence in such transactions, who is offered money or property to seek trade opportunities or competitive advantages.

It is a very wide definition – so any activities that advantage or promote the company’s interest but done through accepting cash goods or any other benefits will be caught. These benefits may include receiving commission or reimbursements, hospitality expenses such as food and drink, offers for promotion, ads, sponsorships, research, and labor services.

NATIVE UNION faces consequences for employee bribe-taking behavior, ranging from an administrative fine from RMB 10, 000 up to RMB 200, 000 (with confiscation of any illegal gains by the employee).

For criminal bribes, NATIVE UNION’s directors risk a maximum of 10 years imprisonment as well as criminal fines.

REMEMBER!

- ✓ Do not enter into business relationships without carrying out prior checks and complying with current company procedures.
- ✓ Inform your service providers of NATIVE UNION’s commitments and their need to abide by them.
- ✓ Bribery in China is a zero-tolerance crime; absolutely no bribe is acceptable.

Q&A

You wish to purchase a product from a supplier offering you a highly competitive price. This supplier has all the administrative authorizations required to export the product to your factory, but you learn that not only does it not provide the working conditions required under local legislation but also employs children. Should you proceed with the order?

Proceeding with this order would violate the principles of this present Code and also those of the International Convention on Labor Organization. You must advise your service provider that until it complies with the legislation and regulations, you cannot do business with it.



PROTECTION OF PRIVACY AND PERSONAL DATA

NATIVE UNION respects the protection of privacy and personal data in accordance with the laws of the country in which it operates.

This protection is offered not only to all its employees, but also to workers with whom NATIVE UNION deals on a daily basis. Each of us is also required to ensure the protection of personal data processed by us, with respect for the laws and present Code.

What is personal data?

Personal data are items of information that allow an individual to be directly or indirectly identified. They may include that person's name, address, date of birth, and photograph.

These data may be collected, processed, used, circulated, or stored by all means.

Who is involved?

Personal data collected may belong to our employees, our customers, or to other service providers.

How is this data used?

Personal data must be fairly used only for a precise purpose, and must not be stored beyond the period strictly necessary for the intended purpose.

Transfer of data from one country to another, especially from a European Union country to a non-European Union country, is regulated. Compliance with current rules should therefore be verified before any transfer is made.

In Hong Kong, the processing of personal data is subject to the Personal Data (Privacy) Ordinance, enacted in 1996 and reformed in 2012. Under the Personal Data (Privacy) Ordinance, the collection of personal data needs to be lawful, fair,

and not excessive. The 2012 reform added provisions on collection of personal data for marketing purposes.

The General Data Protection Regulation ("the GDPR") was effected 25 May 2018. While the GDPR is an EU Regulation, it is applicable to NATIVE UNION because we process data of EU citizens.

Generally speaking, it is advised not to send emails to customers if they have not given prior consent to direct marketing. Recipients should also always be able to unsubscribe from emails or newsletters.

For more information, please contact the Compliance Department at compliance@nativeunion.com.

REMEMBER!

- ✓ All personal information collected must be obtained for a specific purpose and be proceed confidentially in accordance with laws applicable in the matter.
- ✓ Be extra cautious when sending emails to a large number of prospects/customers and contact the Legal Department if you have any doubts on its legality.
- ✓ Every person has the right to have their data amended and deleted.

Q&A

You are launching a new product in the EU and HK, and are planning on sending an email to all customers who have ordered products on the company's website in the last two years. Is this allowed?

You should not circulate this email without the prior consent of the recipient. While all jurisdictions differ in their privacy laws, the overarching principle is the same: you should only send these types of emails to customers who have agreed to be informed of such new launches (and only use the specific channel they agreed to), and always give them the option of unsubscribing.

HEALTH, SAFETY, AND THE ENVIRONMENT

NATIVE UNION works to determine, limit, and control any and all impacts that its activities may have on the environment, health and safety of its employees, well-being of all persons visiting or working on its sites, and that of the population living around its production sites.

For this reason, NATIVE UNION is committed to:

1. Ensuring the safety of its employees;
2. Protecting their health;
3. Optimizing safety on its sites;
4. Respecting the environment;
5. Asking its service providers to respect these same rules.

The environmental effect of our activities can be improved through responsible behavior on a daily basis, achieved by avoiding unnecessary travel and participating in energy saving initiatives.

To achieve this, NATIVE UNION needs each of its employees to be aware of the physical risks inherent to their work and likely to lead to accidents. Each of us must manage these risks and react timely to ensure that all corrective action can be taken immediately.

Employees receive regular training with regard to site safety and their own obligations to ensure the safety of themselves and other employees.

NATIVE UNION adopts and communicates health and safety policies and procedures that aim to reduce injury, illness, and enhance employee health.

Any situation likely to create a risk to health, safety, or the environment must be reported as soon as possible.

REMEMBER!

- ✓ It is in everyone's interest to respect all the health, safety and environment rules applicable within NATIVE UNION.
- ✓ Be mindful of the effects of your daily activity on the environment.

Q&A

While visiting a factory with the team, your supervisor reprimands you once she notices that you are not wearing the mask and gloves required at the site. Is she right to do so?

Violation of safety rules may have serious consequences for your health and therefore, on the business that is responsible for your safety at work. Thus, your employer cannot tolerate this type of negligence for any reason. Specifically, the fact that the visit is taking place outside of the company's premises does not mean you should not respect the safety rules set out by our business partner.



RESPECT FOR GOOD PRACTICE AND PROCEDURES

In order for customers to benefit from safe products, we must respect all the internal and external standards for ensuring its safety, quality, and applicable efficiency at each stage of its life cycle, namely its development, manufacture, storage, and distribution.

We are collectively responsible for providing our customers with safe products.

This also involves promoting products as comprehensively, objectively, reliably, and accurately as possible to allow our customers to appreciate its quality and use it both wisely and correctly.

To achieve this, all information, documents, and promotion must be backed up by an argument based on an indisputable scientific foundation.

The circulation of promotional collateral must comply with the applicable rules.

NATIVE UNION is committed to never exert any undue influence (through actions or statements) on third party conformity assessment bodies that would undermine the credibility and validity of the testing process (as per Company's policy "Undue Influence - Statement of Policy").

Respect for the applicable local or international principles and rules of development, manufacture, and promotion of products is a commitment of NATIVE UNION, possible thanks to the cooperation of all of its employees.

REMEMBER!

- ✓ We are committed to offering safe and effective products.
- ✓ We are all customers.
- ✓ Respect good practices, procedures, laws, and regulations.
- ✓ Circulate only authorized documents and information approved in accordance with applicable company procedures.
- ✓ Do not exert undue influence on third party assessment bodies.
- ✓ Avoid comparative advertising if there are no solid grounds for such promotion.

Q & A

As a marketing manager, to obtain a competitive edge, you want to mention that our product is “three times faster than all of our competitor’s products”. However, this has not been verified by independent testing. Can we mention this feature in our promotional collateral if it was obtained through our own testing?

Technical information given to customers must be both verified through independent testing and accurate. This is not the case here. Our competitor may then argue that our promotion does not comply with good practice and accuse us of unfair competition and misleading advertising.

HOW TO REPORT ONE’S CONCERNS AND VIOLATIONS OF THE CODE

NATIVE UNION is committed to respecting and ensuring that all of its employees respect national and international laws and regulations of all countries in which it is actively involved, as well as its own principles regarding compliance and ethics.

Failure to respect or comply with these laws and regulations may have serious consequences for NATIVE UNION, its clients, its suppliers, our investors, and our colleagues.

Each of us may, one day, be confronted with a situation that violates the law, regulations, or principles of NATIVE UNION.

As an employee of NATIVE UNION, you have the privilege and responsibility of maintaining our company’s reputation.

By advising us of your concerns, you are giving NATIVE UNION the opportunity to resolve any problems and thus, protect the business.

There are different ways of sharing your doubts or concerns, raising questions, or sharing your ideas. These will relate in particular to legal and ethical matters, but may also be linked to quality and working environment.

Most problems may be resolved at local level without more generally affecting the company and other employees.

Accessibility and dialogue are essentials for a compliance programme, and all managers must therefore be open to any of their colleagues wishing to discuss these matters.

As a general rule, the first step is to mention your concern to your immediate superior.

However, some people, despite good relations with their managers, may prefer to discuss their doubts or concerns with a third party. For this reason, you may contact either:

- ✓ Your immediate manager;
- ✓ The COO/CFO;
- ✓ The Compliance Department.

In addition, if you have a doubt or suspicion over any illegal or unethical practices in finance, accounting, internal audit, competition, or anti-corruption activity, you can, provided you are acting in good faith and without the intention of causing harm, contact the Compliance Department as follows:

- By email: compliance@nativeunion.com;
- By post or in person: 2/F, Easttown Building, 41 Lockhart Road, Wanchai, Hong Kong.

In all cases, every effort will be made to guarantee that information relating to a reported violation remains confidential and is shared only with persons required to know.

NATIVE UNION will not tolerate retaliation by any employee against a person who reports any violation, and shall not take any disciplinary or discriminatory measure against that person, provided the report is made in good faith and without the intention to harm.

After a report is made, the Compliance Department, with the support of any other manager or competent auditor concerned, shall examine the violation suspected or observed rapidly and with complete objectivity.

The persons affected by the report shall be informed as soon as possible subject to any prior investigative measures that may be necessary.

If the violation is found to have occurred, suitable measures shall be taken. These may include:

- ✓ Clarification on the practices and principles of the company;
- ✓ Provision of additional training;
- ✓ Disciplinary measures, as described in the Employee Handbook.

REMEMBER!

- ✓ Identify and analyze, without waiting, any situations and actions that seem to violate this Code and could create difficulties for NATIVE UNION.
- ✓ Always act in good faith.

Q&A

I overhear a conversation between one of my colleagues, his banker, and a third party who does not appear to belong to our company. The discussion bears on the results of the company and products under development. This information has not been officially disclosed, and is therefore confidential. What should I do?

Report this conversation to your immediate manager or the Compliance Department. Your colleague should be advised that his behaviour is unethical and detrimental to the company.



MAIN CONSEQUENCES OF BREACHING THE CODE

The main consequences of non-compliance and breaching the Code of Conduct can be summarized as follows:

For our customers and our suppliers

- Efficiency and quality of products compromised;
- Risk to health;
- Risk to the environment;
- Loss of confidence in NATIVE UNION.

For NATIVE UNION (as a company)

- Legal proceedings, fines, and other penalties;
- Impact on relations with the authorities;
- Loss of business and damage to assets;
- Loss of image and reputation.

For our employees

- Proceedings, fines, and prison sentences;
- Disciplinary measures and possible termination of work contract;
- Loss of personal reputation;
- Injury or serious illness.

For our shareholders and investors

- Loss of confidence in NATIVE UNION and its products;
- Loss of value of investments;
- Loss of reputation of business in terms of management.

For any questions regarding the present Code of Ethics and Good Conduct :

- Email Compliance Department at compliance@nativeunion.com;
- By mail or in person at 2/F, Eastown Building, 41 Lockhart Road, Wanchai, Hong Kong.