



MANUFACTURERS OF WELLNESS

ETHICAL CODE

VITAE NATURALS

May 2020

Purpose

The main purpose of this Code of Conduct is to comply with all of those aspects which go beyond the manufacturing products and the services rendered, such as Ethical and Social Responsibilities. Vitae Naturals wishes to contribute to the creation of a positive increase of our impact in Source Responsibility.

Vitae Naturals formally assumes these responsibilities and expects the same from the companies with which makes commercial businesses.

Vitae Naturals believes in the right of every individual, of being able to work without being exploited.

Our target is to work with suppliers that accept and comply with the principles of the Ethical Code established in this document, and that encourage whole supply chain to comply also with the mentioned principles.

Social responsibility in the supply chain is also very important to Vitae Naturals.

As an organization, we steadily look for ways to improve in this area and encourage our suppliers to do the same.

By the acceptance of this code, our suppliers guarantee that every business agreements existing and futures with Vitae Naturals will be according to the principles established (Ethical and Social Responsibilities).

The following principles and required criteria to our suppliers are also implemented in our company.

From now on, 'the company' will mean Vitae Naturals or its suppliers involved in supply chain.

1. Business Integrity

- All applicable Regulations and Legislations must be complied.
- Any kind of bribe in order to get any compensation, business or advantage from a third party must never be offered or accepted.
- Any conflict of interests, known by the supplier, created in any business with Vitae Naturals, will be communicated to Vitae Naturals in order to take the appropriate actions.
- Presents can be accepted, provided that, they are made in a transparent way.
- Hospitality and another kind of gratitude by suppliers will be accepted, with the only aim to maintain a good commercial relationship between both companies and not with the purpose of influencing in commercial or strategical decisions.
- Confidential information from competitors will be obtained in a legal way and only for being used for legal purposes.
- Suppliers' confidential information of the company, will not be disclosed or used without the company's permission.
- Confidential information will be securely stored and restricted to authorized personnel.

- Confidential information of the company, know-how and intellectual property, is securely stored.
- Confidential information of other involved parts in business, must be securely stored and with restricted access to authorized personnel.
- Businesses and commercial relationships must be transparent and registered.
- Money laundering is not accepted.
- Personal information about staff, customers and suppliers, will be carefully managed according to the Organic Law on Data Protection.
- Products and offered services must comply with specifications as well as quality and security applicable criteria.

2. Labour Standard

- Any worker must voluntarily choose work and also must be free to leave it, following terms and conditions of their work contract.
- Forced labours, slavery, coercion, human trafficking, etc., are forbidden.
- Employees must not pay any fee in order to access to their assigned work position.
- Employees must be respected with regard to their rights, employment contract, applicable rules with social security, etc.
- Employees have available channels to communicate any complain.
- Reprisals against these complains by the company are totally forbidden.
- All staff must be trained in order to avoid abuses, harassments, intimidation, discrimination, etc.
- The normal employment age is 18.
- Child labour must be strictly prohibited by Supplier.
- Requirements and aims established in International Labour Organization Worst Forms of Child Labor Conventions are met.
- Supplier must not obtain any kind of benefit from forced or compulsory labour.
- Violence, abuse, harassment, works performed by unpaid or non-contracted labourers must not absolutely take part of the internal rules of this social responsibility policy.
- Subcontractors must be in compliance with this Ethical Conditions.
- Working conditions (referred to number of hours and days worked, leaves, benefits, etc.) must be according to national law and signed by employee and company, and in a language that is understandable for both.
- Employees will not be forced to work more hours than established in collective agreements. All extra hours will be voluntary and paid to the employee.
- Employees must be provided with wages and benefits that comply with applicable national laws.
- All employees receive a monthly wage where deductions, benefits, base salary, etc. are disaggregated.
- The salary is paid on time and entirely at once.

- Wages for any worker will be matched their professional category, being encouraged according to their professional competence, achievements, reached goals, etc., regardless of their gender.
- Any deduction in wage which is not covered by law, will be carried out only with employee's permission.
- Employees must rest at least 24 hours for each 7 days of working.
- The company must respect the freedom of every worker to be a member or not of a Trade Union and to take part of its activities. Employees will not be intimidated and any reprisal will be carried out against them to become a member of a Trade Union or associations.
- The supplier must not practice any kind of discrimination with employees regarding race, color, religion, sex, age, intellectual and physical capabilities, national origin or sexual orientation. This behavior has to be promoted among employees. All workers must be treated with equality, respect and dignity.
- Vitae Naturals will only select suitable candidates according to their qualities or professional experience, regardless of their gender.
- Transparent, right and impartial means for resolving relationship problems must be available. These kinds of problems should be investigated and closed.
- Confidentially with regard to this topic has to be maintained if employee requires.
- All employees should be trained in order to avoid recriminations.
- Land rights of communities (including indigenous peoples) will be protected.
- The company commits to be in compliance with FPIC (Free, Prior and Informed Consent) principles:
 - Not acquiring directly or leasing agricultural lands which have been illegally or unfairly taken.
 - Not using raw materials which have been manufactured in these kind of lands.
- The company bets for upholding individual or indigenous people's rights referred to land property.
- Suppliers must be assessed regarding Land Grabbing, ensuring that principles of FPIC (Free, Prior and Informed Consent) are applied.
- Zero tolerance of Land Grabbing is implemented at the company and along its supply chain.
- All relevant employees should be trained in terms of "zero tolerance" of Land Grabbing.
- Assessments regarding Land Grabbing will be conducted in case of land acquisition by the company. It will be carried out with participation of affected communities and in an accessible language for them.
- This document can be considered as a public commitment to actively support the UN Voluntary Guidelines on the Responsible Governance of Tenure.
- A commitment of respect of human rights expressed in the "International Bill of Human Rights" should be available. For this purpose, business enterprises must avoid causing or contributing to adverse human rights impacts and address them when they occur.
- The responsibility to respect human rights should be reflected in the policy of the company, being internally distributed to staff involved.

3. Safety and Health

- Workplace environment must be healthy and safe, providing: potable drinking water, fire exits, adequate sanitation, safety equipments, appropriate lit, equipped work stations and medical service.
- Facilities must be constructed following national applicable law.
- Accidents that may occur will be registered and investigated when applicable.
- All workers must be trained regarding Health and Safety issues.
- All workers must periodically receive personal protective equipment at no cost.
- All workers should be informed about the specific risks in their work positions.
- All workers should be able to take an appropriate decision against an incident.
- The company will make available to employees toilets, lockers, showers and canteen areas.
- All products and services delivered by the supplier must meet the quality and safety standards required by applicable law.

4. Environment

- Companies must operate with care for the environment and ensure compliance with all applicable laws and regulations in the country where products or services are manufactured or delivered.
- Environmental topics like water, energy, air quality, atmosphere emissions, use of hazardous materials, etc., must be kept in mind in a transparent way to avoid significant risks.
- Wherever possible sustainability practices must be carried out to reduce generation of wastes, landfill, gas emissions, consumption of water and to protect biodiversity/deforestation.
- Supplier's sustainability practices will be periodically reviewed in order to check whether appropriate policies are implemented to achieve the above mentioned practices.

Vitae Naturals reserves the right to verify the supplier's compliance with the code.

Vitae Naturals reserves the right to demand corrective measures in case of detection that supplier is not in compliance with the code.

All workers of Vitae Naturals are annually trained.

A risk assessment with preventive actions and its monitoring is established.

The failure of this social responsibility policy by Vitae Naturals's suppliers means the removal of supplier from the homologation list.

The failure of this social responsibility policy by Vitae Naturals involves sanctioning and remedial procedures.

This Ethical Code is available for all employees of Vitae Naturals (in Spanish) and suppliers (in English) in the updated version.

Any complaint about bribery acts or failure to comply with this Ethical Code, can be conducted through the following e-mail: quality@vitaenaturals.com

ACKNOWLEDGMENT FORM OF SUPPLIERS CODE OF CONDUCT

In the name of _____

(Supplier's company name)

I certify that I have been provided by a copy of Vitae Naturals's code of conduct for suppliers, which has been completely revised.

(Supplier's company name)

Agrees to comply with this code of conduct and to inform Vitae Naturals of any breach of these principles.

Date:

Name:

Position:

Signature & Stamp: