

HUNTERS & FRANKAU LIMITED

Hunters & Frankau

EST. 1790

IMPORTERS & DISTRIBUTORS OF THE FINEST CIGARS

Code of Conduct

Dear Colleagues

The Habanos SA Code of Conduct has been adopted by Hunters & Frankau Limited and sets out the standards of responsible behaviour of the Company that we expect all employees and anyone doing business with our Company to adhere to.

Our Code of Conduct is in accordance with the requirements that are expected of us by Habanos SA.

Our Code of Conduct is an essential tool to ensure the long-term sustainability of our business. Your personal and collective commitment to the standards set out in our Code is crucial to fulfill our sustainable business objectives. It is important for us to ensure that all our activities are conducted with the utmost integrity.

It is incumbent on us all to read the Code thoroughly to ensure we clearly understand what is expected of us, and to adhere to the behaviours outlined in all our daily activities.

Our continued success depends on high standards of conduct and behaviour, underpinning our reputation and enabling us to achieve our objectives over the long term.

A handwritten signature in black ink that reads "Jemma Freeman". The signature is written in a cursive, flowing style.

Jemma Freeman

Executive Chairman

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INTRODUCTION

What is our Code of Conduct?

Our Code of Conduct is a document that is a summary of the diverse practices and policies relating to the behaviour of the Company and its employees.

The Code of Conduct sets up the standards of responsible behaviour that all employees of the Company are expected to follow.

Who should follow the Code of Conduct?

The Code of Conduct applies to every employee of the Company, regardless of role and location. We must all always follow the standards and behaviour requirements set out in the Code of Conduct.

In addition, all contractors and consultants employed by the Company, as well as all sub-distributors, franchisees and licensees must also work within the standards and behaviour outlined in the Code when conducting business on our behalf.

Why is the Code of Conduct important?

We must ensure all our activities are conducted with the utmost integrity. The Code of Conduct is integral to the development of our long-term sustainability and the fulfillment of the Company's business objectives.

The Code of Conduct is a key element of our internal control policy, to ensure that we have the appropriate controls to support employees when they fulfill their roles while conducting business on behalf of the Company.

What can I do if I have a query or concern?

The Code of Conduct cannot describe every situation you may encounter. If you are unsure, there are a number of ways to seek help or advice.

If you have concerns as to what course of action you should take in any given situation, it might help if you ask yourself:

- Is it legal?
- Is it ethical?
- Is it in line with Hunters & Frankau Limited's Code of Conduct?
- Am I setting a good example?
- Would I be comfortable explaining my actions to my colleagues, family and friends?
- Would I or the Company be comfortable if others read about my actions in the media?
- Have I consulted my colleagues who have knowledge of the topic to help me make an informed decision?

If you are concerned about the measures adopted by a colleague, it may be that by simply talking to them, you could resolve the situation. Otherwise, you should discuss your concern with your director or with the Company Secretary.

Compliance with our Code of Conduct

All Company employees must comply with the standards set out within this Code. When a violation of the Code of Conduct has taken place, appropriate disciplinary action will be taken accordingly.

BUSINESS INTEGRITY

Conducting business with integrity will support the sustainable growth of our business.

We are committed to dealing honestly and lawfully with all parties with whom we conduct business.

1. ANTI-ILLCIT TRADE

The prevention and elimination of smuggling and counterfeiting is one of our business priorities. We must never engage in or facilitate illicit trade activities.

We must ensure that we only conduct business with companies and individuals that are reputable. We must work with governments, regulatory bodies and law enforcement authorities to prevent the illicit trade of our products.

The illicit trade of our products has a damaging effect on our Company. It is contrary to our commercial interests and harms our business reputation and our brands. It diminishes the legitimate markets in which we operate to compete for market share. It deprives governments of revenues and tempts consumers to purchase products from unregulated sources. In addition, the illicit trade undermines the regulations which govern the legitimate tobacco industry and may be connected with other serious criminal activities such as money laundering or drug trafficking.

Illicit Trade products include:

Contraband of legitimate products purchased on a duty paid or duty free basis but smuggled into and sold illegally in other markets in contravention of fiscal or customs laws. These products are known as “black market products”.

Counterfeit of products which illegally copy existing brands which are manufactured and/or sold in violation of trademark rights, often smuggled into other markets to be sold without paying the corresponding duty.

We must:

1.1	Supply products only in quantities proportional to their consumption in the destination market.
1.2	Ensure legally binding written agreements are in place to cover all relationships with customers, distributors, licensees and other third parties.
1.3	Thoroughly investigate all incidences of product diversion and take appropriate action to mitigate the risk of further diversion.

1.4	Seek to ensure that our customers share our standards of integrity and are aware of the relevant elements of said standards.
1.5	Ensure customers, distributors, licensees and other third parties are appropriately evaluated before product is sold to them.
1.6	Report any suspicion related to the illicit trade of tobacco products to the Managing Director, gathering as much information as possible prior to doing so but without compromising either your own safety or the safety of other third parties.
1.7	Ensure that any proposal to suspend and/or terminate the supply of products to our customers because of illicit trade activities is notified in advance to the Company Secretary.
1.8	Review all customer data annually.

We must not:

1.9	Expose ourselves to personal risk or danger when gathering or reporting suspected incidences of illicit trade activities.
1.10	Continue to trade with customers identified as being involved, deliberately or recklessly, in illicit trade.
1.11	Deliberately ignore or be willfully blind to any suspicion regarding the implication of a customer or supplier in the loss of our products in the legitimate supply chain.

2. MONEY LAUNDERING

We must never engage in or facilitate money laundering. We must ensure that our products cannot be used for money laundering activities or to disguise the proceeds of crime.

We must:

2.1	Only accept payment from customers, distributors and other businesses or individuals with whom we commonly conduct business and with whom we have carried out full and proper due diligence and verification (including financial checks).
2.2	Immediately raise any concerns to the Company Secretary or Managing Director, after having heard a rumour which suggests that a customer is or may be involved in illicit trade activities.
2.3	Be very careful in all circumstances that suggest improper financial transactions might be taking place. Some examples of such activities are: <ul style="list-style-type: none"> • a customer who is unwilling to provide general, personal or business information; • a customer who wants to pay large amounts of cash;

	<ul style="list-style-type: none"> • a customer who appears unconcerned with price or other terms and conditions of purchase; • a customer or supplier who wants to be paid into a bank account in a country different to his country of residence or operation.
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We must not:

2.4	Accept any cash or cash equivalents that are, or could be, the proceeds of criminal activity.
2.5	Ignore, deliberately or recklessly, any of the “red flags” that suggest improper financial transactions might be taking place.

3. COMPETITION AND ANTI-TRUST

Hunters & Frankau Limited is committed to competing honestly with other enterprises in the same sector, and in this regard we must comply with the anti-trust and competition laws that apply to our business.

3.1 Agreements/Contact with Competitors

Subject to applicable law;

We must not:

3.1.1	Make or indicate, either directly or indirectly, a willingness to agree prices, discounts or other terms of trade with competitors, including setting minimum or maximum prices, stabilising, altering or co-ordinating prices.
3.1.2	Agree with the competitors the quality or quantity of products to be supplied into a particular market or customer group.
3.1.3	Engage in any form of bid rigging.
3.1.4	Agree with the competitors a boycott to a supplier, customer or distributor.
3.1.5	Agree with competitors to divide up markets, customers or product categories.
3.1.6	Discuss or exchange commercially sensitive information with competitors, including customer and product information.

3.2 Trade Associations

We must not:

3.2.1	Impose or agree fixed or minimum resale prices with customers or distributors, or dictate their profit margin or the maximum level of discount they can offer, taking into consideration the local law of each country.
3.2.2	Sign Exclusive Distribution and Franchise Agreements with restrictive clauses regarding territories and passive sales that violate the anti-trust laws of each

	country.
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3.3 Information Gathering

We must:

3.3.1	Understand what kind of competitive information we can gather and how we may use it.
3.3.2	Ensure that our own competitive information is not disclosed either directly or indirectly to competitors.

We must not:

3.3.3	Attempt to gain access to information regarding the business activity of a competitor by illegal or inappropriate methods, including: <ul style="list-style-type: none"> • engaging in industrial espionage or undercover surveillance to access information which is not publically available; • hiring competitors' employees for the purpose of obtaining confidential information or commercially sensitive information; • approaching competitor's customers or employees to obtain confidential information.
3.3.4	Adopt methods of gaining information which may be considered either inappropriate or illegal.
3.3.5	Accept, disclose or use information that we know or have reason to believe was disclosed confidentially or by a confidentiality agreement between a third party and one of our competitors. For example, information about a competitor's proposal while a negotiation process is still going on.

3.4 Monopolising or Abusing a Dominant Market Position

We must:

3.4.1	Seek legal advice in each market on the activities that may cause a dominant position abuse. This includes: <ul style="list-style-type: none"> • bundling or tying different products and services together • using excessively aggressive discounting or incentives designed to drive out competitors • discriminating unfairly between customers, for example, charging different prices to customers of similar position, without objective justification • limiting production to prejudice customers • refusing to supply new or existing customers without objective justification.
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4. ANTI-BRIBERY AND CORRUPTION

Compliance with bribery and corruption laws is compulsory. We must not offer, give or accept any gift, payment or other benefit, seeking an improper advantage for our Company.

We must:

4.1	Bring any request or demand for a potentially corrupt payment by a third party to the attention of a Director.
4.2	Follow the special rules that apply to government officials and consultants.
4.3	Address all “red flags” that indicate there may be a corruption risk. Some examples of this kind of alert We must not ignore: <ul style="list-style-type: none">• When the country has a history of corruption problems.• The customer is not a resident or uses shell or ghost companies.• A consultant is related to, or recommended by, a public official.• A consultant requests for “urgent” high commission payments relative to the services offered.• A customer uses a bank account opened in a tax haven or belonging to a third party.• A customer, agent or consultant refuses to sign an agreement that meets Hunters & Frankau Limited’s standards.
4.4	Actively discourage the use of facilitation payments in markets in which we operate.
4.5	Seek guidance from your line manager, Director or the Company Secretary.

We must not:

4.6	Pay, offer, accept or authorise a bribe or facilitation payment, or ask anybody else to do so.
4.7	Offer or give anything of value to anyone for the purpose of securing or retaining business or for any other purpose
4.8	Make or authorise an improper payment or bribe to a government official or employee of a state-owned or controlled business.
4.9	Attempt to induce a public official to do something illegal.
4.10	Ignore or fail to report a corrupt activity
4.11	Establish an unrecorded fund (such as a secret cash or off-the-books account) for any purpose.
4.12	Encourage or facilitate someone else to commit or ignore a corrupt activity.

5. GIFTS AND ENTERTAINMENT

When giving or receiving gifts or entertainment, we must ensure that doing so cannot distort our business relationship, create a conflict of interest or be construed as a bribe.

We must:

5.1	Always receive prior written authorisation from the Executive Chairman or Company Secretary before giving or receiving anything, regardless of its value, from a public official or employee.
5.2	Have commercially justifiable purpose for every gift or entertainment.
5.3	Take into consideration the normal Company practice on Gifts and Entertainment before giving or receiving any gift or entertainment.

We must not:

5.45	Offer, give or accept anything illegal or unethical, or which would result in a violation of law or of the Company's Code of Conduct.
5.5	Offer, give or accept any cash or benefits in turn for a commercial favour, for example, from a supplier to obtain an agreement.
5.6	Ever engage in unacceptable conduct <ul style="list-style-type: none">• Anything illegal or that could be perceived as a violation of local law or our Code of Conduct.• Giving or receiving of gifts, cash or cash equivalents.• Offering, giving or receiving anything as part of an agreement to do or gain something in return.• Any event that could be considered inappropriate, or anything that might adversely affect the reputation of Hunters & Frankau Limited.

6. RESPONSIBLE PROCUREMENT AND SUPPLIER PARTNERSHIPS

We must only do business with trustworthy suppliers who have a reputation for conducting their business affairs in a professional and ethical manner.

We must:

6.1	Adopt a responsible attitude when selecting suppliers, completing due diligence to ensure that their practices will not in any way damage our reputation.
6.2	Ensure that any supplier agreements incorporate our Code of Conduct to make certain that our suppliers are aware of our ethical standards and agree to comply with the overriding principles of the Code of Conduct.
6.3	Ensure that our day to day suppliers are aware of our Code of Conduct, as relevant to them e.g. as relevant to a contract for office maintenance and cleaning.
6.4	Encourage and support all of our suppliers to adopt our standards.

6.5	Always act in compliance with our group procurement policy.
6.6	Raise any concerns related to supplier activities to the Company Secretary, so that the potential risks may be appropriately investigated.

We must not:

6.7	Accept or ignore supplier activities which may infringe Human Rights law or our Code of Conduct.
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7. POLITICAL ENGAGEMENT

Engagement with Government, legislators, industry bodies and public interest groups is an important and necessary element of our business activity. Such engagements must be completed according to the Law.

We must not:

7.1	Represent or claim to act on behalf of the Company in any political activity which we are carrying out as private individuals.
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8. CUSTOMS AND TAX:

We must act with integrity in all our contacts with any Government authority, including customs and tax officials.

We must:

8.1	Ensure all appropriate local destruction and tax reclaim documentation is accurately completed in order to include product volumes and values.
8.2	Ensure that our documentation is delivered according to the Customs rules and regulations.
8.3	Make sure that our product is distributed in a supervised environment, with updating of the local accounts and financial records with the purpose of registering all inventory destructions.
8.4	To be acquainted and comply with all the standards and restrictions in relation to the work with public officials and their employees or contractors.
8.5	Be honest, accurate and open in all our statements and certifications.

We must not:

8.6	Accept or ignore any suspected violation of our standards on customs and tax and discuss any concerns with our line manager, Director and the Company Secretary.
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9. INTERNATIONAL SANCTIONS AND TRADE RESTRICTIONS

We must understand and comply with all international sanctions and trade restrictions.

We must:

9.1	Understand what sanctions and trade restrictions may be relevant to our functions and responsibilities.
9.2	Comply with all sanctions and trade restrictions.

We must not:

9.3	Accept or ignore any suspicion that international sanctions or trade restrictions are being violated.
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RESPONSIBLE COMMERCIAL PRACTICE

We must ensure responsible, honest and lawful commercial practice when managing our business affairs.

Good corporate and individual conduct is essential when working with Hunters & Frankau Limited's assets, records and information.

10. ACCURACY OF ACCOUNTING, FINANCIAL RECORD KEEPING AND DISCLOSURES.

We must honestly, accurately and objectively report and record all of our financial and non-financial information as this allows the Company to make decisions based on commercial activity, safeguard our resources, fulfill our responsibilities and achieve our legal and regulatory requirements.

We must:

10.1	Ensure all financial reports, notifications, forecasts and analysis we are responsible for are submitted honestly and accurately.
10.2	Comply with all laws, external accounting requirements and Company procedures for reporting financial and business information.
10.3	Demonstrate integrity, honesty and care when submitting our own travel expense and when approving those of others.
10.4	Avoid cash transactions. If there is no alternative, cash transactions must be authorised, properly recorded and documented.
10.5	Ensure contractual commitments we make on behalf of the Company are within the scope of our delegated authority.
10.6	Make all efforts to identify any potential misrepresentation of accounts, data or

	records or any incidence of potential fraud or deception and raise any concern about the accuracy of the financial reports to the Finance Director.
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We must not:

10.7	Prepare or submit any information with the intention of misleading the reader.
10.8	Make a dishonest or deceptive entry in any report or record.
10.9	Misrepresent the correct purpose of any transaction.
10.10	Create an unrecorded or improperly described fund for any purpose.
10.11	Sell, transfer or dispose of any Company asset without prior authorisation and appropriately completed documentation.
10.12	Modify any Company record unless authorised to do so by established policies and procedures.
10.13	Engage in any activity aimed at falsely exaggerating or moving sales volume or profit between reporting periods as this would distort our financial position.
10.14	Provide any information, either verbally or in writing, about our transactions that would make it possible for a customer or supplier to make inaccurate or deceptive financial statements.

11. USE OF COMPANY PROPERTY, ASSETS AND RESOURCES

Company property, assets and resources are at our disposal for business purposes. We must ensure their proper and appropriate use.

We must:

11.1	Protect and use the Company funds and property in the same way we use our own, safeguarding them against theft, loss, fraud or corruption.
11.2	Ensure all business expenditure, including personal expenses, is supported with honest, accurate and appropriate invoices, vouchers and documentation.
11.3	Ensure we only make reasonable personal use of Company supplied electronic systems, including personal computers, laptops and mobile devices.

12. INTELLECTUAL PROPERTY

We must protect Hunters & Frankau Limited's and its suppliers' intellectual property, made up by elements such as trademarks, design rights and copyrights, since they are valuable corporate assets.

We must:

12.1	Protect the Company's intellectual property assets and, given their importance to our business, we must also respect the intellectual property assets of third
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	parties.
12.2	Report any product which we suspect may infringe the Company's or its suppliers' intellectual property rights including "copycat" products and suspected counterfeit products.
12.3	Ensure written agreements are in place to make certain that the Company is the owner of intellectual property rights of materials which are created or developed for us.

We must not:

12.4	Use names, trademarks or other design elements which consumers might associate with some others when marketing or promoting Company products.
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13. RESPONSIBLE ADVERTISING AND MARKETING

Our commercial activity is subject to specific advertising and marketing requirements based on law, industry codes, voluntary agreements and our own Standards. Regardless of where we work, we must apply these Standards at all times.

We must:

13.1	Ensure that all of our tobacco products distributed by us, have clearly visible health warnings, according to the regulations in each country.
13.2	Always respect our Advertising Policy and International Marketing Standards, as well as the local cultures, practices and traditions which exist in our market.
13.3	Illustrate and describe our products in an honest way that will not mislead consumers.
13.4	Ensure all claims we make are true and can be substantiated.

We must not:

13.5	Advertise or market our products to those under 18 years old. This includes the use of images or other content which could be perceived as attractive by minors.
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14. HIGH STANDARD OF PRODUCTS AND BUSINESS PROCESSES

Delivering high quality products and services to our customers and consumers is essential to the sustainability of our business.

We must promote high standards actively seeking to improve our working practices in all aspects of our company and in particular our sales operations.

We must:

14.1	Demonstrate our commitment to delivering high standards by applying a constant focus.
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14.2	Continually seek to improve efficiencies in our commercial activities, services and product quality.
14.3	Support the delivery of our objectives by following and maintaining defined processes.
14.4	Ensure all relationships with business partners including customers, suppliers and third party producers are managed in accordance with our standards.
14.5	Maintain effective controls to ensure that any standard or quality issue is quickly identified, allowing us to adopt corrective actions.
14.6	Challenge the problems and support the process of encouraging team work to improve our performance standards.

We must not:

14.7	Accept or ignore poor standards
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15. PRIVACY OF INFORMATION (DATA PROTECTION)

We must treat personal information with respect and confidentiality in accordance with our obligations of privacy and data protection laws.

We must:

15.1	Only collect or use personal information for Company business purposes.
15.2	Ensure that individuals whose information we hold know we have it and understand what it will be used for.
15.3	Only share personal information if the people whose information we hold would expect us to do this.
15.4	Keep personal information securely, whether it is held electronically or on paper.
15.5	Restrict access to personal information to those who have need to know.
15.6	Ensure that personal information is accurate and up to date.
15.7	Delete or destroy personal information as soon as there is no more need for it.
15.8	Ensure that employees who handle personal information understand their responsibilities and put them into practice.
15.9	Comply with any additional local legal requirements in relation to personal information.

We must not:

15.10	Transfer information about employees, customers, suppliers and other individuals to other countries without adequate protection
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16. ELECTRONIC COMMUNICATIONS

We use electronic equipment to help us to do our work. The electronic equipment and the information it contains is the Company's property. The Company reserves the right to monitor or filter any content or communication in order to protect the Company from security breaches, loss of information or legal actions.

We must:

16.1	Protect equipment from unauthorised use or theft when unattended.
16.2	Ensure the personal comments or remarks do not damage the reputation of the Company or commit the Company to something over which we have no authority.
16.3	Protect confidential or sensitive information when travelling or sending information to others.
16.4	Report any loss of confidential or sensitive Company information.

We must not:

16.5	Install applications to any Company device or connect it to any other equipment unless approved by the IT Department.
16.6	Disable equipment security measures.
16.7	Access, store or share anything that could be considered offensive to others or could expose the Company to legal action.
16.8	Share our personal passwords with others.

17. INFORMATION MANAGEMENT

Our corporate records contain valuable information which is used by the Company to provide evidence of our activities and decisions. They also enable us to demonstrate that we are fulfilling our regulatory and legal obligations.

Whenever we record information we must do so accurately and ensure we maintain the appropriate level of confidentiality and security.

We must:

17.1	Carefully and accurately record the business activities for which we are responsible.
17.2	Ensure that records are kept in a way which allows them to be shared appropriately.

17.3	Comply with all legal and business requirements for keeping records.
17.4	Review records on a regular basis and safely dispose of those which no longer need to be kept or which must be disposed of in accordance with law, including to comply with rules on data protection.
17.5	Comply with any request received from the Company's Legal advisors to suspend the disposal of records, including requests concerning pending litigation or regulatory investigation.

18. CONFIDENTIAL INFORMATION

We create, use and share confidential information on a daily basis. This information is considered confidential when it is not available in the public domain. We must protect this information in order to safeguard our own and the Company's interests and reputation.

Restrictions on sharing confidential information apply until it becomes available to the public and remain in force even when we are personally no longer employed by the Company.

We must:

18.1	Take particular care not to discuss or work with confidential information in public areas, when it could be seen or overheard.
18.2	Ensure that security measures are in place to make certain that confidential information cannot be lost or stolen, particularly when travelling or when sending it to others.
18.3	Ensure that appropriate formal arrangements are in place relating to the necessary release of confidential information.

We must not:

18.4	Disclose information which is not publicly available to others inside the Company, unless they have a business reason to know.
18.5	Disclose information to people or organisations outside our business, except where disclosure is required for business purposes or by law.
18.6	Seek to obtain or use confidential information relating to other people including our competitors, even if we indirectly receive the information.
18.7	Make use of confidential information from a former employer.

19. CONFLICTS OF INTEREST

Our business decisions must always be made in the best interests of Hunters & Frankau Limited and we must never allow our personal or family interests to conflict with our obligations to the Company.

We must:

19.1	Avoid situations where our personal interests or those of our partner, family member or close relative could conflict with the interests of the Company.
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We must not:

19.2	Use our position in the Company for personal benefit or for the benefit of our partner, family member or close relative.
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20. EXTERNAL COMMUNICATIONS

Our reputation depends on our professional and ethical behaviour. All we do and say and everything our external stakeholders say about us defines Hunters & Frankau Limited's reputation.

We must protect the integrity of the information we provide by ensuring we give everyone equal access to honest and accurate information.

We must:

20.1	Ensure there can be no misunderstandings between our personal views and those of the Company. For example, we must not use the Company's letterhead, logos or e-mail system to express personal views or for any personal matter.
20.2	Ensure media announcements and press releases are approved by persons authorised by the Board of Directors.
20.3	Ensure regulatory presentations and public statements are approved by persons authorised by the Board of Directors.
20.4	Refer any approach made by an investor or financial analyst to the Executive Chairman or Company Secretary.
20.5	Refer media and press enquiries to an appropriately authorised person or to the Executive Chairman.

We must not:

20.6	Talk about or write anything on behalf of the Company unless we have been authorised to do so.
20.7	Talk about or write anything on behalf of the Company about subjects extending beyond our own area of responsibility.
20.8	Write anything on Weblog sites unless we make it explicitly clear that we are expressing personal points of view or opinions and not those of the Company or the Company's Management.

TRUST, RESPECT AND RESPONSIBILITY

Our business activities directly and indirectly affect communities and societies around the world.

We are committed to building a work environment that promotes integrity, teamwork, diversity and trust.

21. DISCRIMINATION AND HARASSMENT

We must all play our part in maintaining a workplace fair, respectful, free of any form of harassment, discrimination or any other kind of demeaning behaviour.

We must:

21.1	Treat all colleagues fairly and equally in accordance with their ability to achieve the requirements and standards of their job.
21.2	Demonstrate respect for cultures that may differ from our own.
21.3	Recruit, develop, promote and provide other conditions of employment, without regard to a person's age, race, origin, gender, sexual orientation, disability, political view, religion, marital status or physical or mental health or any other legally protected status.
21.4	Reasonably accommodate employees' disabilities, religious beliefs or practices.

We must not:

21.5	Allow any discriminatory factor to influence our decisions, either directly or indirectly, related to an individual's recruitment, reward or career progression.
21.6	Engage in any form of harassment or abuse, or any behaviour that could be perceived as offensive, intimidating, malicious or insulting.
21.7	Accept or engage in any form of behaviour that excludes an individual or group of individuals from team or group activities, social engagements, team events or any other activity undertaken in their team.
21.8	Accept or engage in any form of behaviour that creates a hostile working environment.

22. A HEALTHY AND SAFE WORKING ENVIRONMENT

We must behave in a manner that promotes a positive Health and Safety culture and challenge unacceptable or potentially dangerous behaviour.

We must:

22.1	Conduct our operations in compliance with the Health and Safety laws and our own Occupational Health, Safety and the Environment Policy as this may exceed what local laws dictates.
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22.2	Understand the hazards, risks and control measures of our activities and environment.
22.3	Know what to do in an emergency situation and test our understanding.
22.4	Proactively consider our own health and safety and that of the colleagues and others.
22.5	Integrate health and safety considerations into our daily work activities.
22.6	Report to your Line Manager all accidents, incidents, failures and breaches in compliance with Occupational Health and Safety.

We must not:

22.7	Accept or ignore any suspected poor practice concerning health and safety.
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23. ENVIRONMENTAL RESPONSIBILITIES

We are committed to introducing more environmentally sustainable ways of working. We all have a role to play in reducing the impact that our activities have on the environment.

We must:

23.1	Reduce the impact of our day to day activities on the environment by: <ul style="list-style-type: none"> - favouring the use of renewable materials and the development of sustainable environmentally friendly packaging, whilst continuing to meet customer expectations and consumer preferences. - modifying our own behaviour to reduce our impact on the environment by reducing waste, cutting out unnecessary travel, saving water and energy. - ensuring unavoidable waste is reused, recycled or disposed of in a responsible way. - taking all the necessary actions to comply with Occupational Health Safety and the Environment Policy.
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We must not:

23.2	Ignore or accept any suspected or known violations of Occupational Health, Safety and the Environment Policy.
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24. HUMAN RIGHTS

We must promote and protect Human Rights and ensure we do not, directly or indirectly, contribute to any human rights abuses.

We must work towards the elimination of any abuse in Human Rights which may exist in the labor market, particularly if they are established to be any way connected to our business or supply chain.

We must:

24.1	Work with our suppliers, licensees, agents and joint ventures to encourage and support their implementation of minimum age/forced labor standards.
24.2	Encourage everyone who either directly or indirectly works with us to comply with our standards.
24.3	Protect the right of all employees to allow freedom of thought, conscience and religion, as well as the freedom of opinion and expression.
24.4	Respect the rights of all employees in case of any violation of their right to equal protection against discriminations.

We must not:

24.5	Engage anyone under the minimum working age or under the mandatory school age.
24.6	Allow or make any distinction against any employee on the basis of his political, religious or jurisdictional status of the country or territory to which they belong, ensuring when necessary that valid working permits are in force for those working outside their country of nationality.
24.7	Allow any discrimination arising from an employee's right to participate freely in his community culture.

25. COMMUNITY INVOLVEMENT AND CHARITABLE CONTRIBUTIONS

We are committed to making a positive contribution in those communities where we work.

We must:

25.1	Take special care when considering charitable contributions, making prior request to the Charity Committee of the Company. We must avoid everything that may create a conflict of interest, that could be regarded as bribe or corruption, or that may conflict with our standard on gifts and entertainment.
25.2	Refer to our marketing standards to ensure that any proposed donation would not in any way violate our own policy.

We must not:

25.3	Give any charitable donation to any unregistered entity or not-for profit organisations which are informal or unrecognised or any individual or organisation where due diligence has not been conducted.
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CODE OF CONDUCT ADMINISTRATION

Our Code of Conduct is specifically designed to ensure consistency in how we fulfill the management of our business activities both inside and outside the Company.

Hunters & Frankau Limited is committed to truth, openness and objectivity in all its activities.

Procedures for investigating and handling potential violations of the Code of Conduct have been developed to ensure consistency of process across the business.

Responsibilities:

The Executive Chairman of Hunters & Frankau Limited, is responsible for administering our Code of Conduct.

All Directors, Managers and employees at Hunters & Frankau Limited are responsible for complying with the Code of Conduct.

All employees are responsible for notifying, honestly and accurately, any actual or potential violations of the Code of Conduct that comes to their attention.

If an employee identifies a potential violation, he should inform the Company Secretary who, together with the Executive Chairman, will determine the process to be followed.

In all cases of violation of the Code of Conduct, the same procedure will be used for the application of the disciplinary measures, according to the Company's disciplinary policy.

Signatures and Acknowledgment

All the employees must sign an acknowledgment document, confirming they have read the Code of Conduct and will abide by its provisions.

Failure to read the Code of Conduct or sign an acknowledgment will not excuse anyone from compliance with the Code of Conduct.