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Our H&H Code of Conduct



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AURELIA
PROBIOTIC SKINCARE



Letter from our CEO

Great Team!

At H&H our mission is to make people around the world healthier and happier. We aspire to be a global leader in premium nutrition and wellness whilst contributing positively to society and the environment.

Our foundation pillars are the principles behind what we do, why we do it and how we go about our business. They unite us around our mission and anchor us as we grow and move forward. The pillars along with our purpose and our values set a high standard for every one of us.

Whilst we have a GABA spirit – for doing things first and fast, and a culture of LGI – Learn, Grow and Improve is in the core of all our people and what we do; it is a must that this attitude is underpinned by a commitment by all of us to operate with integrity and transparency. As by integrating our values into the way we do business we can truly create sustainable growth. At H&H everything we do must respect our ethical standards and the laws in all the countries we operate in; therefore our Code

of Conduct sets out our commitment to our stakeholders and the standard of behaviour to which all of us at H&H must adhere to.

I hope that all team members across all countries and brands are committed to ensuring that these standards are met throughout our business. This is vital not only for the effectiveness and the sustainability of our business but also for the continued reinforcement of our dual economic and social commitment.

We are committed to maintaining a culture that encourages open communication and supports team members in reporting any concerns they may have. I would like to thank you all for taking the time to read and understand the importance of our Code of Conduct.

Laetitia Garnier - CEO





Contents

	OUR H&H CODE OF CONDUCT	
	Letter from our CEO	03
1	WELCOME TO H&H GROUP	05
	Connecting to Our Purpose	06
	What are our Foundational Pillars?	07
	H&H and Me – Why do we have a Code of Conduct?	08
	What’s expected of Me?	09
	H&H and Me – How do I make the right choices?	10
	How do I raise a concern?	11
2	ADVANCE THE STORY OF GOOD HEALTH	12
	Advancing the story of good health in our teams	13
	Advancing the story of good health of our consumers	14
	Advancing the story of good health in our community	16
3	REDUCE OUR FOOTPRINT ON THE PLANET	17
	Reducing our footprint on the planet	18
4	HONOUR HUMAN RIGHTS AND FAIRNESS	19
	Are Equal Opportunities important to H&H?	20
	Creating a safe working environment	21
5	GOVERNANCE	22
	How does H&H ensure Corporate Governance?	23
	How does H&H ensure Compliance?	24
	How should I work with others? (Customers, Partners and Suppliers)	25
	How does H&H ensure integrity of Reporting?	26
	How does H&H protect privacy and ensure security of information?	27
	How does H&H Group promote healthy market competition?	28
	How does H&H handle Conflicts of Interest, Gifts and Anti-Bribery?	29
6	APPENDIX	30
	Definitions	31

1

Welcome to H&H Group

Striving to become a global leader in advanced baby nutrition and care, and highest quality vitamins, supplements and skincare, H&H Group brings together premium consumer brands on the journey to making people healthier and happier. Connected by our One Big Team spirit and key to our success, H&H Group consists of more than 3,500 (circa) talented and high-performing team members who are inspired by our Mission and dedicated to bringing our purpose to life through passionate, purpose-led careers.

Connecting to Our Purpose

Our Values represent what is important to us. When we connect through our Values we strengthen our culture, are clear on what is important and become a higher performing company.

We expect all of our people to live our Values everyday. In doing so, we can be certain that we can achieve our Mission.

Our Mission

We exist to make people around the world healthier and happier



Our Vision

We strive to become a leading global player in premium wellness through superior products and aspirational brands



Our Values in Action

We do this by living our Values of Passion, Bravery, Trust, One Big Team and Celebrate Life Every Day



What are our Foundation Pillars?

Our foundation pillars are the guiding principles behind our business and represent the core foundations on which we have built our business and on which we want to continue to grow:



People

People and passion are the reason we succeed. Culture is the single most important part of our business – we inspire and trust each other, as well as valuing individual expertise and collaborate every day.



Heritage

We are very proud of our history. The origins of our brands share many themes and have been led by vision and entrepreneurial spirit but above all we stay true to our heritage and the stories behind each brand.



Innovation

Research is key to unlocking the secrets to wellness. We invest in research and development and collaborate with world-leading experts to strengthen our capability.



Quality

Quality is everything. We seek the best ingredients from across the globe to ensure we provide the best product possible for our consumers.



Wellness

We are a lifestyle advocate for wellness. Positive health decisions can be influenced and we actively engage people of all ages to live a healthier lifestyle.



Global Citizenship

Building trust and sustainable decisions are in our heart, together with community we create positive social impacts. We are part of the United Nations Global Compact, the world's largest corporate sustainability initiative.

H&H and Me – Why do we have a Code of Conduct?



Our Code of Conduct sets out our global standards which are supported by our Values, driven by our Behaviours and which each of us must follow every day.

Our Values and the corresponding Behaviours keep us focused and help us stay true to our Mission to make people around the world healthier and happier. Our Code of Conduct applies to all team members at H&H Group, including leaders, executive leaders and our board of directors; across all brands in every location, as well as its subsidiaries and controlled companies. We also expect all of our partners, providers, suppliers and customers to follow the standards we uphold in our code.



Our Code of Conduct, as amended from time to time, supplements our policies and procedures. Please check with your line manager or local P&C representative to understand your local policies and procedures. Upon joining the H&H Group, all team members will be informed of this Code of Conduct and will be required to ensure they have read, understood and always comply with the standards and expectations set out in this Code of Conduct.



What's expected of Me?

H&H Group is built on integrity and transparency. We make decisions and take actions that are driven by our Values. When conducting business, each team member is obligated to follow all the applicable laws, rules, regulations, policies and guidelines governing the Group as well as the region in which they are operating.

At H&H Group, we value integrity, compliance, diversity and inclusiveness whilst respecting our team members privacy and rights. As a member of the H&H Group, you are expected to uphold these same Values when performing business on behalf of the Group.

Team members should:

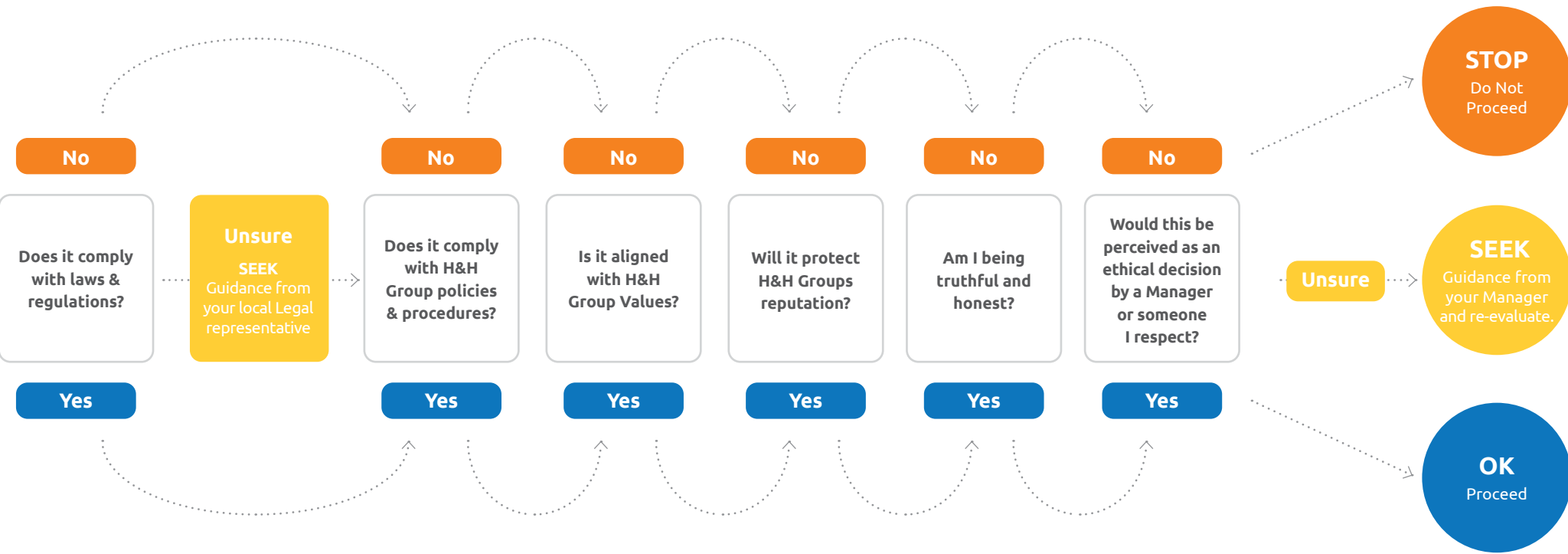
- Make decisions and take actions that are aligned to our Mission to make people healthier and happier
- Always act with integrity and honesty
- Understand that they are responsible for making yourself aware of and always conducting yourself in a manner that is compliant with the relevant local laws and regulations, as well as company policies
- Report and raise any situations or actions that could compromise our safety, quality or reputation, or that of our customers, partners or suppliers.

Our People Leaders play a pivotal role in driving these expectations. In addition, they are expected to communicate this Code of Conduct and ensure that all team members reporting to them within their area of responsibility understand and comply with these standards. As H&H Group operates in multiple regions and markets, team members are required to respect cultural diversity and other differences that come with political and legal systems. In any (hopefully rare!) instance where group policies conflict with local laws and regulations, local laws and regulations will prevail. We are committed to protecting our brands and our reputation. It is important that all team members are aware that should you fail to comply with the standards outlined in the Code of Conduct, you may be subject to disciplinary action, which could be up to and including termination of your employment. Any instances of alleged misconducted will be treated as serious and investigated. Please refer to the Company's **Compliance Management Policy** for further information and guidance or speak to your local P&C representative.

H&H and Me – How do I make the right choices?

Our ethical decision framework helps us ensure that we make the right choices every day.

If you are unsure about a situation, the below questions will help to ensure you are making an ethical decision about the possible course of action.
If you have identified an ethical dilemma, ask yourself:



Remember to always **think before you act** and seek guidance when you are unsure.
Speak to your manager in any instance where you are unsure about whether you or someone else is complying with our standards.

How do I raise a concern?

To help make H&H Group a fair and safe place to work we need all team members to speak up when they become aware of or suspect misconduct has occurred. In doing so, we can ensure we promote a culture that is free from any behaviours or conduct that may compromise our workplace or reputation.

We are committed to compliance and to protecting the privacy of anyone who reports activities believed to be illegal, dishonest, unethical or otherwise improper. All workplace concerns will be treated with utmost confidentiality. In some instances, it may be necessary to disclose information if it is deemed necessary for a fair and proper investigation and resolution of the matter. H&H Group is committed to ensuring that team members who raise a concern in good faith are not subjected to adverse action in reprisal for raising a concern. It is a breach of this policy for any team member to cause disadvantage or discriminate against another team member who raises a concern.

There are several ways to raise a concern, however as a guideline, we recommend you consider which of the two below are most appropriate.

Local Process (Team member conduct and behaviour)

Our local reporting process will be driven by your local region however as a guide, you can speak to any of the below:

- Your manager
- A member of your People & Culture team

All team members are encouraged to raise concerns using our local reporting process related to the following matters:

- Misconduct or Inappropriate Behaviour
- Breach of Policies or Procedures
- Discrimination, Harassment or Bullying

HH Speak Up (Corporate misconduct)

We have established a whistle-blowing system called “HH Speak Up”. HH Speak Up is a confidential and independent whistle-blowing service managed by Deloitte on behalf of the Group.

All team members are encouraged to utilise HH Speak Up to report any misconduct related to the following matters:

- Abuse of Influence
- Bribery or Corruption
- Breach of any internal Policy or Procedures
- Conflict of Interest
- Fraud
- Theft
- Other Unethical Behaviours, Misconduct or Harassment

If you are unsure about how to report a concern or which reporting avenue to take, speak to your manager or a member of the people and culture team. It is important to be aware that you may be in breach of this code if you are aware of a breach and do not report it using one of the above listed options.

Speak to your local P&C representative for a list of channels for reporting in your local region. For further information on HH Speak Up, please contact a member of the Global Internal Audit Department.

2

Advance the Story of Good Health

We advocate & educate to share the benefits of a healthy lifestyle, spread wellness, and team up with like-minded partners. We invest in activities that help people to live healthy lives and promote wellbeing for all ages through the pillars of mind, nutrition, and movement. We create products that contribute to the health and wellbeing of consumers worldwide. We build a healthier and happier world, by partnering with suppliers and organisations that share our Values regarding people and sustainability

Advancing the story of good health in our teams

Health and happiness is much more than just the name of our group. It represents our shared passion for nurturing and improving the quality of our health and wellness at all stages of life and inspires the ambitions our brands strive to achieve.

Our philosophy of health and wellbeing focuses on the three pillars of wellness:



Mind



Movement



Nutrition

This approach follows the concept that the way you live life directly impacts the joy you experience, and we are firm believers that people should invest in these pillars in an attempt to avoid health challenges.

This starts with our team members. Healthy team members bring to life our brands and deliver products for our consumers efficiently and effectively and therefore is a priority.



Health and Happiness can look different to each of us therefore we encourage team members to respect the different ways in which team members invest in our three key pillars.

TEAM MEMBERS SHOULD:

- Encourage and advocate other team members to invest in their health and wellbeing

TEAM MEMBERS SHOULD NOT:

- Discourage other team members from participating in wellness activities or initiatives

Advancing the story of good health of our consumers

Premium Quality Product Commitment

We strive to become a leading global player in premium wellness through superior products and aspirational brands. Our products are created to contribute to the health and wellbeing of consumers worldwide which is why it is critical that our products guarantee compliance with all relevant regulations and industry standards and exceed our customer expectations when it comes to quality. Our H&H Group Quality Charter outlines our expectations and commitment to quality and ensures quality is embedded firmly within the culture of our global organisation.

We offer our customers the most premium products on the market and are able to do so by ensuring exceptional quality of our products. H&H Group spares no effort to ensure that all of our products are safe, healthy and high-quality. We always focus on quality awareness and improve quality systems and control processes that identify, evaluate and respond to quality risks.

Part of delivering on quality is ensuring we communicate the product benefits accurately.

Complying with Product Regulations

H&H Group complies with all applicable laws, regulations and standards in relation to product, labeling or packaging quality. We take all quality and compliance concerns and complaints seriously and manage any issues promptly and thoroughly.

Our Quality and Regulatory teams ensure that our Group can anticipate, shape and master legislation, overcome challenges and be externally focused and manage Authorities, Experts and Trade Associations.

We do this by ensuring that our new product development, raw material use, product manufacturing and packaging, as well as our product launching strictly comply to the laws and regulations applicable.

Our internal policies and processes ensure that we comply with these requirements at all times.

Marketing

At H&H we bring together premium brands from across the globe, each with their own heritage and culture. We compete vigorously by striving to be the first to bring innovation to the market so that our customers always get the most premium products and the best value. The trust of our customers is essential to maintaining and strengthening the

reputation of our brands and our position in the markets we operate.

For this reason, we must make only truthful statements about the products across our brands. All marketing claims must be substantiated and live up to their promises.

You should be familiar with the sales and marketing review procedures that apply to your work. As laws and regulations change frequently in this area, you must know the latest requirements and understand how they relate to you.



TEAM MEMBERS SHOULD:

- Be aware of, and always comply with the policies and procedures designed to protect the quality and safety of our products
- Responsibly market our products with consumers at the heart of the decisions we make to communicate product features, usage and benefits
- Communicate to our suppliers the importance of quality and obtain their commitment to assuring the quality and safety of our products and services they provide to us as outlined in our Supplier Code of Conduct
- In the event that you become aware of a product complaint that occurs following the use of our products (this may be from friends, family or your own personal use) you must follow the local reporting requirements and report the concern immediately so that we can act promptly with taking the necessary action

TEAM MEMBERS SHOULD NOT:

- Compromise on quality in any capacity of their work
- Exaggerate or mislead consumers on product benefits

SUPPORTING POLICIES:

- *H&H Group Quality Charter*
- *H&H Responsible Marketing of Breast Milk Substitutes Policy*
- *Supplier Code of Conduct*

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For guidance, contact your local Quality Assurance (QA) team for safety or quality related concerns of our products.

Advancing the story of good health in our community

At H&H, our Mission extends to the health and wellbeing of the communities in which we live and work. We all have a duty to act in a manner that enables the continued trust and confidence of the public.

We encourage all team members to be aware of the needs of their local communities and seek out ways to actively contribute to making a difference.

Team members are expected to uphold our commitment to pursue good corporate citizenship and to ensure that we do not act in any way that could cause harm to the reputation of our brands or market position.



TEAM MEMBERS SHOULD:

- Contribute to our H&H community engagement initiatives where possible
- Take interest in the challenges of their local communities and show care to the people that make up that community



3

Reduce our footprint on the planet

We use resources efficiently and act on climate change to preserve our environment for future generations.

We aim to achieve economic growth whilst engaging in sustainable procurement practice and protecting the ecosystems on which we rely for raw ingredients.

We provide consumers with information through standards and labels to ensure traceability and transparency.

We will use resources more efficiently, be mindful of our carbon footprint and make conscious decisions to reduce and offset our emissions.

Reducing our footprint on the planet

Protecting our Environment

We respect our environment and are committed to protecting the source of many of our ingredients - nature.

We do this by implementing environmentally sound practices to ensure protection of the environment. H&H Group is committed to adhering to all environmental laws and regulations in an effort to continuously improve the environment.

We all have a duty to protect our environment and to ensure we have a sustainable future, which is why we've developed, and are committed to achieving our sustainability goals.

TEAM MEMBERS SHOULD:

- Understand and comply with environmental regulations
- Make a conscious effort to reduce waste
- Recycle where possible
- Consider the impact on the environment as well as cost when procuring products or services
- Be mindful of the environmental implications in such areas as new product development, marketing activation plans, trade marketing, packaging and content recycling

SUPPORTING POLICIES:

- [H&H Supplier Code of Conduct](#)
- [H&H Raw Material Sourcing Policy](#)

Contact your local sustainability champion for more information about reducing your footprint on the planet.



THE STORY OF GOOD HEALTH



OUR FOOTPRINT ON THE PLANET



HONORING HUMAN RIGHTS AND FAIRNESS



4

Honour human rights and fairness

We protect human rights as the foundation of health and happiness. We will work to ensure that individuals touched by our business are granted basic rights and fundamental freedoms to which all humans are entitled to. We will respect and enhance human life in our workplaces. We will put in place formal and informal structures to reduce inequalities and eliminate discrimination.

At a minimum we respect and adhere to The Universal Declaration of Human Rights, and understand the risk of causing or contribution to human rights abuses as a legal compliance issue. Our Mission surrounds people, and that means we go far beyond this though and actually look to enhance livelihoods through our operations and offerings.

Are Equal Opportunities important to H&H?



Our Mission is to make billions of healthy and happy people around the world. This Mission starts with how we treat our people.

We take our employment obligations seriously, are committed to honouring human rights, providing equal opportunities, safe working environments and treating everyone fairly. Our key interests are harmony and mutually beneficial resolution and therefore we handle disputes according to the relevant laws and regulations.

We are committed to upholding these fair work practices and ensuring that everyone, whether our People or external business partners are treated with integrity and respect.

We recruit and retain the best talent from across the world, reflecting the markets and countries that we serve. We believe that a diverse mix of backgrounds, skills and experiences can only lead to driving new ideas, products and services to help us reach our goals.

TEAM MEMBERS SHOULD:

- Embrace diversity and inclusion by attracting and retaining talent across a broad range of factors, such as but not limited to, age, gender, ethnicity and ability
- Treat everyone fairly, with dignity and respect
- Know and abide by laws regarding compensation, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, other benefits and welfare
- Consider how they are contributing to this goal for recruitment, promotion, reward and benefits, and training opportunities which must be based on merit

TEAM MEMBERS SHOULD NOT:

- Engage in any forms or acts of discrimination harassment or bullying.
- Tolerate any form of discrimination, harassment or bullying

For further information refer to your local equal employment opportunity policies that may operate in your region or speak to your local P&C representative.

Creating a safe working environment

At H&H Group, we are dedicated to creating a safe working environment for all team members, including those who work from or visit our sites.

We strive to protect the safety of our team member's by implementing health and safety strategies, systems and practices that are focused

on educating and promoting awareness and compliance with safety in the workplace.

It is everyone's responsibility to maintain a healthy and safe work environment.

We expect all team member's to put their health and safety first and that they look out for the health and safety of their colleagues.



SAFETY FIRST



PROTECTION



HAZARDS



REGULATIONS



HEALTH



INSURANCE

TEAM MEMBERS SHOULD:

- Follow all health and safety polices and procedures
- Comply with relevant occupational health and safety laws and regulations
- Report any health and safety concerns, hazards, near misses, injuries, and incidents that occur in accordance with local reporting procedures
- Work in a manner that will not harm themselves or others

TEAM MEMBERS SHOULD NOT:

- Engage in any task or activity that may compromise their own or another team members health and safety
- Perform work under an impaired state under the influence of drugs or alcohol

SUPPORTING POLICIES

- *Global health and safety policy*

For more information, refer to your local Health and Safety Policy or speak to your P&C representative.

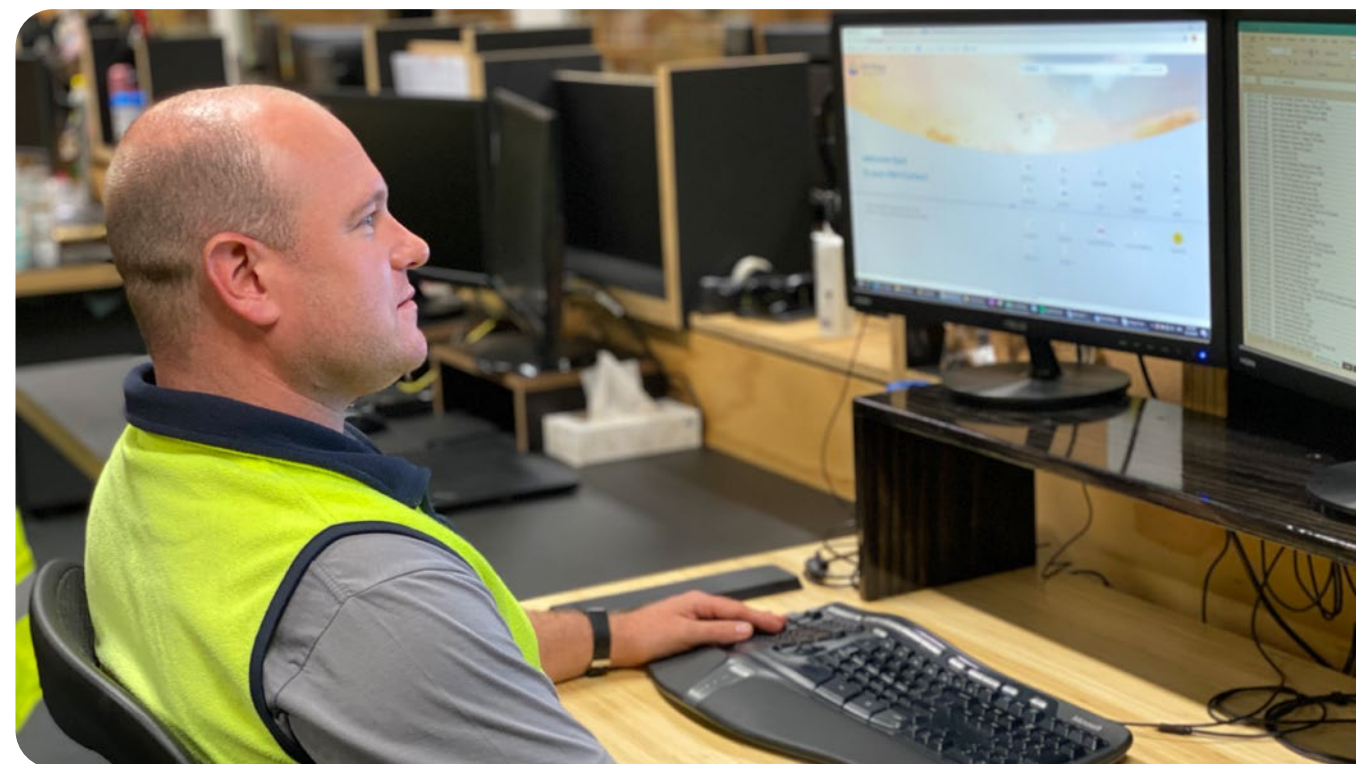
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Governance

Across the H&H Group we demonstrate authentic industry leadership and operate and conduct business with integrity – ensuring we maintain the trust and confidence of our stakeholders, such as healthcare professionals, customers, shareholders, supply and retail partners, government officials and people within the communities we serve.

It comes back to respecting our heritage, ensuring we are operating for many years to come by delivering on the expectations of all of our stakeholders.

How does H&H ensure Corporate Governance?



H&H Group is committed to safeguarding the interests of shareholders through proper corporate governance and continuously enhancing corporate value.

We guarantee to comply with Corporate Governance Code issued by Hong Kong Stock Exchange (HKEX) and the laws and regulations of where the Group business activities are conducted.

We have developed an Inside Information and Securities Dealing Compliance Manual to help ensure all team members understand their obligations for complying with Corporate Governance.

TEAM MEMBERS SHOULD:

- Adhere to all applicable restrictions when buying and selling securities of our parent company

TEAM MEMBERS SHOULD NOT:

- Engage in insider trading and must not disclose commercially sensitive information which is not available to the public

SUPPORTING POLICIES:

- *Inside Information and Securities Dealing Compliance Manual*

How does H&H ensure Compliance?

Compliance management is fundamental to H&H Groups sustainable and healthy development, which is why we have developed a Charter to outline our commitment to the importance of compliance and have established a Compliance Management Team to oversee the implementation of our compliance principles.

Import and Export Compliance

We comply with import and export laws and regulations of where the H&H Group conducts business activities. To ensure we maintain our trade privileges we must ensure that we do not violate any laws or regulations.

Intellectual Property Regulation Compliance

Intellectual Property (IP) is one of our most competitive assets of the H&H Group. For this reason, we must protect our intellectual property, including patents, trademarks, copyrights, commercial secrets and other intangible assets.

Third-Party Compliance

When working with business partners or any other third-parties, H&H Group adheres to the principles of fairness, prohibits team members from engaging in

any improper or illegal activities through third-parties which includes the use of personal influence that may lead to undue pressure or unfair advantages. We expect third parties such as suppliers, distributors, e-commerce platforms and intermediaries to recognise the Group’s Values and follow the laws and regulations relating to product quality, product regulations, and environmental health and safety regulations.

Compliance Training and Communication

When conducting business, each team member is obligated to follow the applicable laws, rules and regulations and guidelines governing the Group’s business. As compliance risk management is a part of ERM (Enterprise Risk Management), it is included in our group risk management framework. Risk owner of each department is responsible for providing compliance training in its business areas.

SUPPORTING POLICIES:

- *H&H Group Compliance Management Policy*
- *H&H Group Compliance Management Charter*

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For more information contact the Group Compliance Management team.

How should I work with others?

(Customers, Partners and Suppliers)

Good Business Practices

We are immensely proud of our achievements and the enduring partnerships we have developed with our customers, partners and suppliers across the globe. When working with others, we always ensure we apply good business practices.

H&H Group expects all third-parties to recognise the Group’s Values and follow

the laws and regulations, including but not limited to product quality, product regulations, environmental health and safety regulations.

Working with Customers

H&H Group gives all competing customers within a given market equal opportunities to qualify for the same prices, terms of sale and trade promotions.

Working with Partners and Suppliers

The success of our business is strengthened by the strategic relationships and networks we have forged with our partners and suppliers across the globe. For this reason, we must protect these relationships and always act with integrity when working with partners and suppliers.

We are committed to allowing suppliers and agencies to compete equitably for our business based on the total value offered by that supplier.

If you are involved in the partner or supplier selection process, you must make decisions based solely on the merits of the partners or suppliers offering ensuring that you always follow the internal Policies and Procedures related to purchasing.

TEAM MEMBERS SHOULD:

- Perform their duties in a professional manner
- Act with honesty and integrity
- Conduct business that complies with the standards in this Code, our H&H Values and the relevant laws and registration
- Strive to enhance H&H Group’s reputation and performance

TEAM MEMBERS SHOULD NOT:

- Make purchasing decisions on the basis of reciprocal deals, gifts or entertainment
- Solicit any (potential) partner or supplier on behalf of charitable, civic or other organizations without prior authorization
- Pressure or agree with a customer about resale prices of H&H Group product
- Create or contribute to unlawful competition by limiting in-store competition
- Certain competition laws also govern how we must interact with our customers, including both retailers and distributors. You must treat our customers equitably and never seek to provide any unfair advantage to one customer over another

- It is important that you are aware of these obligations and always comply with these when conducting business

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For more information, speak to your local Legal team.

How does H&H ensure integrity of Reporting?

H&H Group is committed to complying with all obligations in respect to the Hong Kong Stock Exchange requirements including but not limited to, finance and accounting policies, tax legislation requirements, Environmental and Social and Governance (ESG) reporting, as well as complying with other reporting obligations relevant to the countries in which we operate. We are committed to providing our shareholders integrity of information by ensuring we maintain accurate and complete data records.



TEAM MEMBERS SHOULD:

- Ensure they maintain a high level of data and information integrity
- Ensure data is appropriately retained and disposed of according to information management practices and application legislation relating to privacy

TEAM MEMBERS SHOULD NOT:

- Alter, falsify or destroy information related to business activities
- Conceal, forge or tamper with financial records
- Disclose any false or misleading financial reports or information

SUPPORTING POLICIES:

- *H&H Group Tax Risk Management Policy*

How does H&H protect privacy and ensure security of information?

Ensuring the security of information and respecting and protecting the privacy and confidentiality of information of all team members, customers, investors, business partners and third parties is critical to our success. We are committed to ensuring that personal information is handled responsibly and in accordance with the applicable legislation.

The H&H Group complies with the laws and regulations in respect to collecting, using and storing information. In line with this, we will only collect, process and use information for legitimate purposes.

All team members are required to protect any information collected during the course of doing business and are required to follow the local laws and Group Information Security and Privacy Policies and Standards in the course of collecting or processing data.

Disclosing any information that is not authorised or using information for personal purposes is strictly prohibited.

TEAM MEMBERS SHOULD:

- Protect their personal information and information of other employed individuals, customers, investors, business partners and third parties
- Strive to protect the company’s information security
- Follow confidentiality laws and prevent the disclosure of any confidential information
- Report any suspected breaches of information immediately to the Global Information Security Team. Contact Global Information Security Team if a new project/business process involves processing of confidential or personal information.

SUPPORTING POLICIES AND STANDARDS:

- *H&H Group Privacy Policy*
- *H&H Group Information Security Policy*
- *H&H Group Information Security Control Baseline*
- *H&H Group Personal Data Protection Baseline*

Please reach out to Global Information Security Team (isms@hh.global) if you need consultation regarding information security or privacy issues.

How does H&H Group promote healthy market competition?

Competition Laws (Anti-Trust)

H&H Group always advocates fair, free and legal competition and strictly follows competition law (anti-trust laws) to avoid any monopolistic behaviour. Monopolistic behaviour is any act that hinders trade, restricts or excludes fairness and free competition.

We understand and value the benefits that consumers experience when there is fair and competitive trading in the marketplace. For this reason we have implemented measures that ensure our brands and products compete fairly.

It is important that all team members understand that failing to comply with these laws can have serious and far-reaching consequences for our business and the individuals involved which is why we all must ensure that our decisions and actions are directed towards promoting healthy market competition.

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For more information or guidance speak to Group Legal team.



How does H&H handle Conflicts of Interest, Gifts and Anti-Bribery?

Anti- Bribery

H&H Group competes fairly through product innovation and quality service to obtain sales orders and competitive advantage. Bribery is an unfair way of seeing business opportunities or other economic benefits and severely undermines fair market competition.

H&H Group prohibits bribery under any circumstance and strictly prohibits team member’s seeking business opportunities from offering or granting improper benefits, and also strictly prohibits team member’s using their jobs to demand or accept improper benefits. The improper benefits refer to both direct and indirect

(ie: by third-party) payment or acceptance. These benefits include but are not limited to:

- cash;
- physical gifts;
- gift cards;
- commissions;
- securities;
- discounts;
- travelling and entertainment, and;
- employment opportunities.

Gifts

All gifts and entertainment (including discounts and commissions) must comply with the provisions of the Group and must be accurately recorded to prevent any forms of bribery and corruption.

If you are unsure about whether or not you need to declare a gift, speak to your Manager or local P&C representative.

Conflicts of Interest

A conflict of interest occurs when a decision or action is taken which compromises the interests of the H&H Group - this could be a personal, financial or other interest that could interfere with your obligation to act in the best interest of the H&H Group.

H&H Group requires all team members to report any instances where a conflict of interest is suspected of or does exist. If you are unsure about whether an action or decision may present a conflict, please speak to your Manager or P&C representative.

TEAM MEMBERS SHOULD:

- Act in the best interest of H&H Group at all times
- Immediately report any instances where a conflict exists, whether actual or potential, to your manager so that the situation can be properly reviewed and assessed
- Be cautious when giving or accepting any gifts or entertainment from anyone who seeks to or is currently doing business with H&H Group

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For further information, refer to your local Anti-Bribery and Corruption Policy or speak to your P&C representative

6

Appendix

Definitions

“H&H Group” means Health and Happiness (H&H) International Holdings Limited and all its related bodies corporate, currently and in the future.

“Group” means H&H and its related bodies corporate.

“Confidential Information” means any and all business, financial, technical and non-technical information that is confidential to H&H Group including, without limitation, know-how, commercial relationships, marketing and business plans, methods of operation, trade secrets, formulas, techniques, ideas, sketches, drawings, models, design concepts and specifications, inventions, strategic, business and financial information, and includes such information regardless of whether the information is owned by H&H Group, licensed to H&H Group, or H&H Group otherwise has rights to it, but excludes information which is:

- in the public domain (except as a result of a failure to comply with an obligation to maintain confidentiality); or
- known to the receiving party (except as a result of a failure to comply with an obligation to maintain confidentiality) prior to its disclosure; or
- required to be disclosed at law.

“Personal Data or Personal Information” is information in any format relating to an identified or identifiable individual, which can include (but is not limited to) personal identifiers, for example: name, address, mobile number, email address, credit card number, passport number, employment details, salary information, IP addresses, etc.

“Intellectual Property” means all intellectual property and proprietary rights (whether registered or unregistered) owned or used by H&H Group including but not limited to:

Intellectual property and proprietary rights in any Confidential Information;

- any processes, formula, technology, systems, reports, drawings, specifications, software, blue-prints, patents, patent applications, discoveries, inventions, improvements, trade secrets, technical data, research data, software, know-how, logos, registered and unregistered business names, registered and unregistered trademarks and service marks, registered and unregistered designs, design rights, copyright and similar industrial or intellectual property rights; and
- all other similar or equivalent rights subsisting now or in the future in any part of the world, in

each case whether registered or unregistered and including all applications for, and renewals or extensions of, such rights for their full term.

“Bribery” occurs when someone is involved in improperly offering or providing a benefit or something of value, either to a public official or someone in business, in order to obtain or retain a commercial advantage or to induce or reward improper conduct or an improper decision.

“Conflict of Interest” means a situation in which a person or organisation is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another.

“Global Internal Audit and Risk Management Department” means the H&H Global Internal Audit and Risk Management Department, contactable via ia@hh.global.

“Global Information Security Team” means the H&H Global Information Security Department, which is responsible for both information security privacy management of H&H Group, contactable via isms@hh.global.



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