

## Ethics Policy

### 1. Ethics statement

Our ethical principles are the values that set the ground rules for all that we do as Employees of Urban Planters. As we seek to achieve responsible commercial success, we will treat all Stakeholders of the Company with the utmost respect and integrity.

### 2. The Ethical principles are:

**HONESTY:** We will not say anything that is false. We will never deliberately mislead. We will be as candid as possible, openly and freely sharing information, as appropriate to the relationship.

**MEET OUR PROMISES:** We will go to great lengths to keep our commitments. We will not make promises that cannot be kept, and we will not make promises on behalf of the Company unless we have the authority to do so.

**FAIRNESS:** We will create and follow a process and achieve outcomes that a reasonable person would call just, even-handed and non-arbitrary.

**RESPECT FOR OTHERS:** We will be open and direct in our communication, and receptive to influence. We will honor and value the abilities and contributions of others, embracing the responsibility and accountability for our actions in this regard.

**COMPASSION:** We will maintain an awareness of the needs of others and act to meet those needs whenever possible. We will act in ways that are consistent with our commitment to social responsibility.

**INTEGRITY:** We will live up to Urban Planters' ethical principles, even when confronted by personal, professional and social risks, as well as economic pressures.

**INVOLVEMENT IN THE COMMUNITY:** Urban Planters aims to be a responsible partner within the local communities in which it operates through the support of community initiatives and local charities. Each Franchisee is encouraged to support reputable initiatives which address the needs of their local community.

### 3. Ethical Management

**COMPLIANCE WITH THE LAW:** It is always our policy to stay within the laws, rules and regulations of the countries in which we operate. It is our policy to co-operate fully with relevant public authorities and regulatory bodies as appropriate.

**GIFTS AND ENTERTAINMENT:** Special care must be taken in accepting or giving gifts and entertainment. These are not permitted if it would create a real or perceived conflict of interest. The exchange of social courtesies is acceptable when there is a clear business purpose and they remain

within good taste. Neither the receipt nor the giving of excessive entertainment, substantial gifts or favors is acceptable.

**BRIBES OR OTHER PAYMENT TO INFLUENCE BUSINESS TRANSACTIONS:** The giving or receiving of any such payment is indefensible. No bribes of any sort may be paid to or accepted from Customers, Politicians, Government Representatives, Advisors or Representatives.

#### 4. Guiding Principles

The following principles guide the Ethics Policy and apply to all aspects of dealing with others, whether they are from inside or outside the Company.

- Ensure all representatives of Urban Planters have read, understood and agreed to this policy.
- All representatives are required to assume responsibility for their own behaviour when interacting with others and to ensure that their behaviour falls in line with the ethos of this policy.
- The management of our representative's behaviour is the responsibility of line managers who are responsible for ensuring that the ethos of this policy is being embraced daily.
- Accountability for the above commitment rests with management at every level.
- The Ethics Policy will be evaluated and reviewed to ensure that it is adequate, relevant and effective.

#### 5. Review of the Policy

The Ethics Policy will be reviewed and up-dated every three years unless a change in legislation requires us to do so sooner.

Signed:



Franchise Director  
Date: 2<sup>nd</sup> January 2018