



PM-International

Simple. Successful.



Code of Business Conduct and Ethics for all PM-International

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Legal & Compliance Department
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Message from CEO & Founder

Dear PM-International Family,

We at PM-International are creating and maintaining a culture of integrity and compliance in all business activities, in all places, and at all times. We want to strengthen our organization's commitment to creating an organizational culture of ethics and respect.

We want to be known for our ethical leadership and our core values, as well as our PremiuM company with PremiuM products. We want to be a company where our employees are proud to work, our customers keep enjoying our products, our team partners want to be part of and our suppliers want to do business with.

In our company, we strive for high integrity and high performance—this is why we have created a *Code of Business Conduct and Ethics* (the "CODE").

Here you will find all the information regarding our responsibilities as part of the PM-International Family. These guidelines are intended to help us make the right choices and stimulate awareness of ethical issues that we may encounter on our day-to-day business. Bear in mind that we are all expected to use our own judgement and discretion, having regard to these standards, to determine the best course of action for any situation.

This CODE is a resource for all of our directors, employees, customers, suppliers, Team Partners and sponsors who represent us and are part of the PM-International Family (the "Stakeholders").

If a situation arises that is not specifically covered in the CODE or if you have any concerns or questions, please contact your management or contact the Compliance Department.

Please read the *Code of Business Conduct and Ethics* carefully. Remember each of us is responsible for PM-International's reputation.

Thank you for your commitment to maintaining the highest standards of integrity and performance



Rolf
CEO & Founder

Sorg

VISION STATEMENT

Worldwide market leadership in the development and distribution of high-quality products for health, fitness and beauty.

1. Who we are and what we believe in

OUR CULTURE AND VALUES

We are a company of strong values and ethics.

Performance and commitment are crucial to achieving our goals and everyone contributes to this. We can only give our values and goals content through assimilation and loyalty to PM.

OUR CUSTOMERS

The customer is the most important person in our business. Every day we work to recognize their needs and even exceed their expectations! We always offer our customers a solution as a discussion won is a business lost.

OUR RESPONSIBILITY

The title isn't what counts but our daily performance. Each of us is valuable and always willing to take responsibility.

Each of our Stakeholders reflects the image of PM, so all of them should be reliable in professional matters and act with personal and professional integrity.

OUR COMMUNICATION

Openness, honesty, courage, the ability to accept criticism, trust and straightforwardness enable us to communicate openly without fear.

We learn from our mistakes as well as tackle and solve challenges together.

The decisions made are always shared with one another.

OUR MOTIVATION

As an example for others we live what the "PM" in PM-International stands for: PremiumM.

For that, we all do our best in every area, every day – each individually and everyone together!

OUR CODE

Our *Code of Business Conduct and Ethics* is a key resource to Ethics and Compliance information at PM. It contains helpful answers to questions, tips and red flags to assist our PM-International Family in applying our shared values in situations that may come up in day-to-day business.

PM is an international company with offices in over 44 countries. The CODE cannot contain policies relevant to every country. Remember there are other policies and regulations that shall be followed and have to be enforced. Where the laws of a country in which PM is present or represented are stricter than the rules contained in this CODE, the local laws apply.

2. Our social engagements

MISSION STATEMENT

Improve life quality worldwide through premium experiences.

CHARITY

PM is committed to making the world a better place beyond its day-to-day business.

Therefore, we have built up our number of active sponsorships for children in need to over 6000, some now on every continent in the World.

Everyone within PM is helping to make a better life possible for people everywhere in the world: our customers and our business partners. A portion of the price of every product sold is dedicated to making it possible for those children to get an education and gain access to medical care and helping whole village communities on the long term: "aid to self-aid," Rolf Sorg said and his wife Vicki Sorg added „and it is great to see how everyone is pulling together, and what we have already achieved."

SPORTS MARKETING

We have been working closely and confidently with various sporting associations, national teams and world-class athletes for many years.

Among our partners are Association of Tennis Professionals (ATP), Alpine Canada Alpin (ACA), Austrian Ski Association (OeSV), Austrian Sport Aid Foundation (ÖSH), Belgium Handball Association (URBH), Finnish Athletics Federation (SUL), German Athletics Association (DLV), the German Ski Association (DSV), German Ice Hockey Federation (DEB), Association of German Cyclists (BDR), Italian Basketball Federation (FIP), Luxembourg Basketball Federation (FLBB), Korea Paralympic Committee (KPC), Korean Golf Association (KPGA), Korean Table Tennis Federation (KTTA), Korea Wrestling Federation (KFW), Olympic Base Hamburg/Schleswig-Holstein (HH/SH), Spanish Handball Federation (RFEBM), Swiss Handball Association (SHV) and Swiss Sport Aid (SHH). The quality and standards of our FitLine products and our exemplary support in elite sports has led to us being the go to nutritional supplements brand worldwide.

As a company, we have voluntarily agreed to have all the FitLine nutritional supplement products tested regularly for doping-relevant substances. More information under: www.koelnerliste.com.

3. Our Employees

RESPECT IN THE WORKPLACE

Everyone in PM shall behave in a respectful manner towards others.

We are expected to maintain a climate of friendliness and harmony. The conduct of an employee may not impair the reputation of PM or disrupt the harmonious working climate.

Mentoring and motivating are actively encouraged.

OUR EMPLOYEE'S HUMAN RIGHTS

PM is present or represented in many countries and we are particularly careful about the respect of the Fundamental Conventions of the International Labor Organization, such as, notably, the prohibition of child labor and forced labor, the freedom of association, but also promotion of diversity, women's rights and the right to equal remuneration.

In our daily business, we take the following steps to ensure compliance with these principles:

- We do not tolerate unfair treatment.
- We do not accept underage labor.
- We limit work to fair working hours in adherence to the applicable Labor Laws and Regulations of each country.
- We promote equal employment and self-employment.

ENVIRONMENT, HEALTH AND SAFETY

All of our employees have a right to a healthy, safe and secure working environment and safety at work depends on all of us.

We ask our employees and visitors to follow all safety guidelines and immediately report any act or threat of violence, unsafe working conditions, health hazards, or workplace accidents.

EQUAL OPPORTUNITY

We take pride in the diversity of our workforce, which brings together staff from varied backgrounds, cultures and experiences. We embrace this diversity and view it as an advantage.

We strongly commit to promoting equality and the principles of social justice, respect and freedom of expression.

DISCRIMINATION

PM is a discrimination-free environment where people's differences are worth and rights are respected.

Discrimination can refer to any kind of direct or indirect negative action or attitude towards any form of diversity including but not limited to:

- Gender
- Sexual orientation
- Ethnicity or nationality
- Religion or beliefs
- Age
- Disability
- Medical history
- Marital status

PM engages in preventive, as well as affirmative action to ensure equal opportunity including hiring, training, performance evaluations, promotions, compensation, benefits and termination.

PM will strictly refrain from demonstrating bias or prejudice towards individual differences which will be valued and protected.

ANTI-HARASSMENT

We are committed to providing a workplace free of harassment. All our Stakeholders are expected to respect the personal dignity, private life and personal rights of each individual.

Harassment, bullying and discrimination take many forms, including but not limited to:

- Unwelcome remarks, gestures or physical contact.

- Display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including by email and on the Internet.
- Offensive or derogatory jokes or comments.
- Verbal or physical abuse or threats.

We do not tolerate any use of violence or threatening with the use of violence or physical punishment.

We do not tolerate sexual advances, actions or comments, racial or gender-based jokes or comments, or any other comments or conduct that create, encourage or permit an offensive, intimidating or inappropriate work environment.

4. Confidentiality and Privacy

The protection of confidential company information, as well as nonpublic information entrusted to us by our Stakeholders, is essential for our company's success.

Confidential information can be any information, in whatever form, which is not public, i.e. not disclosed in any media that is publicly accessible.

We should use confidential information only for business purposes and disclose it only to those who are authorized and have a need to know.

We request all our Stakeholders to protect our confidential information and proprietary data as part of our business relationship. This obligation of confidentiality continues even after the business relationship between the Stakeholder and PM ends for any reason.

We are committed to protecting the privacy of everyone with whom we do business, including our Stakeholders. We each have the responsibility to comply with our privacy and security requirements.

5. Passion for our Team Partners

We encourage our Team Partners to safeguard and promote the good reputation of PM and its products and avoid all deceptive, misleading, unethical or immoral conduct or practices.

We ask our Team Partners to always act as an independent and responsible entrepreneur and to avoid any possible appearance of acting as an employee of PM or of being entitled to make declarations in the name of PM.

Everything a Team Partner says about PM and our products has to be in accordance with PM's stipulations, especially those in the product catalog, on the product labels and in other product information. On no account may a Team Partner attribute therapeutic or healing properties to our products.

TRUST AND RESPECT FOR INDIVIDUALS

We treat our Team Partners as we treat one another, with dignity and respect. We respect their differences and understand their cultural backgrounds.

CONDUCT TOWARDS CUSTOMERS

We encourage our Team Partners to:

- Refrain from deceptive or unfair sales practices.
- Provide accurate and complete product descriptions and refrain from using comparisons which are likely to mislead or which are incompatible with principles of fair competition.
- Give accurate and understandable answers to all questions from customers concerning the product and the offer.
- Only make promises concerning the products which are authorized by PM.
- Inform customers if the products ordered are unavailable.
- Respect the privacy of customers.
- Not unfairly denigrate another company, its products, its sales and marketing plan or any other feature of that company.

CONCURRING DISTRIBUTION ACTIVITY

Exercising another distribution activity can pose a potential conflict if it competes with the work a Team Partner does for PM, is in a similar business as PM or if the other company offers goods or services through personal direct marketing or via a network marketing system.

We ask our Team Partners to keep such other activities completely separate from their activities for PM and our products.

No Team Partner should offer our products together with goods or services of another company or cause other Team Partners of PM to purchase goods or services from the other company in any way, or to start an activity with such other company.

6. What about Corporate Governance?

POLICIES

PM adheres to the codes and policies established by our partner organizations and the Direct Selling Associations in which we are a member.

received or given by PM in exchange for personal business courtesies.

We ask all our Stakeholders to avoid any behavior which could be interpreted as fraud or bribery. Our Stakeholders should lead by example.

FRAUD AND BRIBERY

PM strictly prohibits any type of fraud or bribery.

Fraud involves deliberate, intentional deception or misrepresentation of information for personal gain. Examples of fraud include theft of cash, checks, or property; manipulation of accounting records.

A bribe is the giving or accepting of money, fees, commissions, credits, gifts, favors, or anything of value that is either directly or indirectly provided in return for favorable treatment.

We avoid any actions that create a perception that favorable treatment of outside entities was sought,

CONFLICTS OF INTEREST

Everyone at PM is expected to avoid any personal, financial or other interests that might affect the capability to perform the job duties or that may be damaging to PM. We have to avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs.

We will always act in the best interest of PM.

Determining whether a conflict of interest exists is not always easy to do. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees have to seek review from their managers or the Compliance Department.

FAIR COMPETITION

We are dedicated to ethical, fair and vigorous competition. None of our Stakeholders should participate in any activities which aim to achieve commercial advantages through illegal or unethical practices.

When conducting PM business, we all have to:

- Avoid making false and misleading statements about competitors.
- Respect the property rights of others.
- Not acquire or seek to acquire by improper means any of competitor's trade secrets or confidential information.

- Not induce a third party to breach an existing agreement.
- Not discuss pricing, production or markets with competitors.
- Never act in a manner that could be seen as an attempt to exclude competitors or control the market.

Sharing any type of information such as pricing, costs or marketing plans with competitors can lead to the appearance of price fixing, territorial division or other types of manipulation or distortion of the free market. In most countries, there are very strict laws in this area which we need to be aware of and comply with.

7. How we care about the Environment

PM conducts its worldwide operations in a manner that aims to preserve the natural environment.

We respect the environmental laws, regulations and permits in the countries in which we do business and encourage all our Stakeholders to consider

the consequences of their actions on humans, the environment and society.

We strive to conserve water and other natural resources and manage waste properly.

8. What we do to guarantee respect of the CODE

It is PM's desire to establish transparent and flexible communication paths. Communication creates work conditions that are favorable to productivity and a perfect environment.

We encourage everyone to speak freely and openly about significant matters and promote reporting of

non-compliant behavior via our Whistleblowing System which is accessible for everyone via our homepage www.pm-international.com.

Alternatively, any non-compliant behavior may also be reported to us via e-mail at confidential@pm-international.com.

9. Updates

PM-International may amend this CODE from time to time as it deems necessary or appropriate.