



PM-International

Simple. Successful.



Code of Business Conduct and Ethics for all PM-International

Table of Contents

1. Common shortened forms	4	5. Uncompromising integrity of everyone in PM-International	11
2. Who are we and what we believe in	5	Obeying laws	11
Our shared values	5	Bribes, gifts and courtesies	11
Vision Statement	5	Corruption	11
Our Culture and Values	5	Conflicts of Interest	11
Our goals and values	5	Personal gain	12
Our Customers	5	Working with a competitor	12
Our responsibility	5	Private personal time and work	12
Our communication	5	Personal activities	12
Our team spirit	5	Hiring Family and Relatives	12
Our motivation	5	Fair competition	12
Corporate Governance	6	Integrity of information	12
Lingua Franca	6	6. Environment, Health and Safety	13
Policies	6	7. Passion for our Team Partners	13
Charity	6	General Conduct	13
Sports marketing	6	Working with TPs	13
3. Using our Code of Business Conduct and Ethics	7	Trust and respect for individuals	13
Basics	7	Code Enforcement for TPs: Our Subsidiaries Responsibility	13
Your Responsibility	7	TP's Code of Ethics	13
Violations	7	Conduct towards customers	13
Reporting Unethical Situations	7	Distribution Activity of a TP elsewhere	14
Ethical Decision-Making	8	8. The Compliance Department	14
4. Work Environment for our Employees	8	Education and Training	14
Respect in the Workplace	8	9. Reminders	14
Professionalism	8	Law	14
Job duties and authority	8	Standards	14
Absenteeism and Under time	9	Processes for revision	14
Commitment to our employees	9	Other materials	14
Our employee's human rights	9	CODE Tips	15
Empowering the diversity of our employees	9		
Equal Opportunity Policy	9		
Anti-Harassment	9		
Leadership capability	10		
Open door policy	10		
Protection of company resources	10		
Intellectual Property	10		
Confidentiality	10		
Privacy	10		
Company Email and technology	10		
Security	11		

Contact information:

Legal, Regulatory Affairs and Compliance
compliance@pm-international.com

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 customer 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 employees, all of those who represent us and are part of the PM Family.

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.



Rolf Sorg
CEO & Founder

1. Common shortened forms

Shortened Form	Extended Form
CODE	Code of Business Conduct and Ethics
HQ	Headquarter
IPR	Intellectual Property Rights
LRC	Legal, Regulatory Affairs and Compliance Department
PM	PM-International
PRO	Policy Responsibility Officer
TP	Team Partners

2. Who are we and what we believe in

OUR SHARED VALUES

Vision Statement

"Market leadership in the distribution of high-quality products for health, fitness and beauty worldwide."

OUR CULTURE AND VALUES

Our goals and values

Nothing is possible without values – for us, values are extremely important. 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 because we are paid by them. Every day we work to recognize their needs and exceed even their expectations! We always offer our customers a solution as a discussion acquired is a business lost.

Our responsibility

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

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.

Our team spirit

The decisions made are always shared with one another.

Our motivation

As an example for others we live what PM-International stands for: PremiuM. For that, we all do our best in every area every day – each individual and everyone together!

CORPORATE GOVERNANCE



LINGUA FRANCA

Our corporate lingua franca – common language – in English.

All internal communications (meetings, e-mails, documents, and phone calls) are required to be carried out in English.

All subsidiary documentation (image catalogue, product catalogue, labels, TP applications and other PM-related documents) are required to be in English and local official languages.

POLICIES

PM is also bound to:

- The European Codes of Conduct for Direct Selling of Seldia–the European Direct Selling Association
- The Direct Sellings Code of Ethics of the World Federation of Direct Selling Associations

This CODE is in line and in compliance with these policies.

CHARITY

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

PM has built up its number of active child sponsorships for children in need to over 800, some now on every continent in the World.

“Everyone with PM is helping to make a better life possible for people on the other side of the world: our customers and our business partners. Into every product we have calculated a contribution that is donated. That means our wellness and cosmetics products help improve the quality of life of people here and also there. We are making it possible for those children to get an education and gain access to medical care and helping whole village communities long term: aid to self-aid, “Rolf Sorg said and his wife Vicki 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 the German, Austrian and Polish Skiing Association (DSV, OeSV and PZN), the German Ice Hockey Association (DEB), the Association of German Cyclists (BDR), the Swiss Handball Association (SHV) and Swiss bobsleigh and sledge Association (Swiss Sliding). The quality of our FitLine nutritional supplement products and our exemplary support in top sports also led to Austria’s Sport Aid recommending our nutrition products to the almost 500 athletes they support.

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

3. Using our Code of Business Conduct and Ethics

BASICS

Although we at PM-International (PM) promote freedom of expression and open communication practices, all employees, members of the Board of Directors, Customers, Team Partners Sponsors, and Business Partners are still obliged to follow a code of appropriate conduct established by the company.

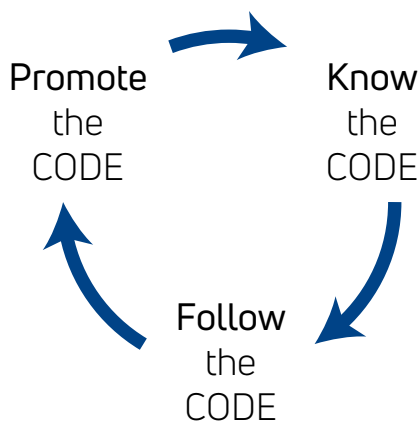
Our *Code of Business Conduct and Ethics* (the CODE) is a key resource to Ethics and Compliance information at PM and refers to the expectation we have from everyone regarding our behavior towards the global organization. It contains helpful answers to questions, tips and red flags to assist our PM family in applying our CODE to situations that may come up on day-to-day business.

Your Responsibility

This CODE is a guideline to help us be successful in our work environment. The principles here are minimum standards which apply to everyone involved with PM-International around the world. Each members of the Board of Directors, Customers, Team Partners Sponsors, and Business Partners reflects the image of PM, we should refrain from any actions which could have a negative impact on the company as a whole.

All members of the Board of Directors, Customers, Team Partners Sponsors, and Business Partners must be reliable in professional matters and act with personal and professional integrity. Everyone is obliged to know the CODE and follow its prescripts.

This CODE is binding for everyone working for PM-International



The CODE is an ever changing tool that rest timely and relevant in our business world. The Company's senior management is responsible for the enforcement. The Compliance Department ensures that the existing regulations are adhered to.

Corporate policies and supporting documents are also at hand to every person part of PM. Please contact your management or subsidiary for more information.

PM is an international company in over 35 countries. The CODE cannot contain policies relevant to every country. Remember there are other policies and regulations that must be followed and have to be enforced.

VIOLATIONS

Where violations of this CODE are determined to exist, appropriate corrective and disciplinary action will be taken on a case by case discretionary basis.

REPORTING UNETHICAL SITUATIONS

PM requires compliance with the law, as well as ethical conduct. If you know of or suspect any unlawful or unethical situation, or know of or suspect a violation of any provision of this CODE, you have to immediately report whatever you know to your Manager, your Subsidiary, your TP, Human Resources or the Compliance Department (please see contact information). All reports will be treated in a confidential manner except where disclosure is required to investigate the matter or by law, rule, or regulation or legal process.

Your concerns will be taken seriously. The appropriate representative will investigate the report and actions will be taken if necessary.

We at PM do not tolerate retaliation against anyone who raises concerns or questions regarding the CODE.

Ethical Decision-Making

If and when you identify an ethical problem, always try to determine the best approach (what should I do?). Here is a helpful framework that can help us with the decision making process of reporting an unethical situation:



4. Work Environment for our Employees

RESPECT IN THE WORKPLACE

Everyone in PM is obliged to behave in a respectful manner towards their colleagues. 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.

Senior Management and Management have to seek respect from their employees through their own personal conduct and work.

Professionalism

Everyone in PM must abide to rules of integrity and professionalism. Our company's official image is important and everyone should be careful regarding their attire. Our dress code in our HQ and Subsidiaries is Business Dress. Everyone working in these places have to follow the dress code and personal appearance guidelines outlined as following:

Everyone has to be clean and well groomed. Grooming preferences by religion, ethnicity, etc. are not restricted but should always be well-presented.

- All clothes have to be cleaned and in good repair.
- Clothes that are too revealing or inappropriate for a specific situation are prohibited.
- Offensive or inappropriate clothes or stamps should be avoided.

The dress code may be occasionally altered in specific cases for special events. This will not apply in cases where an employee has meetings with clients, partners or other external parties.

Job duties and authority

All employees have to pay attention to their job duties and fulfill with integrity and respect towards others. Supervisors, Managers and Senior Management are prohibited from abusing their authority but are expected to delegate duties to their subordinates with respect of their competences and workload.

All employees are expected to follow instructions from their superiors and execute all of their duties as assigned with skill and in a timely manner. All supervisors and management

have to give employees the necessary clear instruction, must advise them and also correct them if need be.

Mentoring and motivating are actively encouraged.

Absenteeism and Under time

An important element of respect is the degree to which employees adhere to established schedules. Regularity in attendance is very important in PM.

Employees are required to follow the Labor Laws and Regulations of the country they are working in and adhere to the established office hours' schedule in their employment contracts.

Each HQ and Subsidiary are mandated to ensure a system that will monitor attendance.

The employee is expected to be available and be at his/her workstation during the regular office hours, except in case of a flexible work schedule.

All Absenteeism must be approved/official leave.

COMMITMENT TO OUR EMPLOYEES

Our employee's human rights

- We do not tolerate unfair recruitment fees
- We do not accept underage labor.
- We limit work to fair working hours in adherence to the Labor Laws and Regulations of each country.

Empowering the diversity of our employees

We take pride in the diversity of our workforce, which brings together staff from varied backgrounds, cultures and experiences. We should embrace this diversity and view it as an advantage. Any form of discrimination and harassment is unacceptable and will not be tolerated.

At times, the multicultural nature of our workforce poses a special challenge, as norms and customs acceptable in one culture may be offensive in another. We should make an extra effort to make colleagues who engage in such behavior understand that it is unacceptable.

Equal Opportunity Policy

Our equal opportunity policy is our commitment to promote equality and conduct our business according to the principles of social justice, respect, freedom of expression when dealing with diversity.

Discrimination is NOT tolerated in PM.

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 will engage 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.

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

Anti-Harassment

We are committed in providing a workplace free of harassment. Everyone belonging to PM is expected to respect the personal dignity, private life and personal rights of each individual.

The use of violence and the threatening with the use of violence or physical punishment is forbidden.

PM will 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.

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 sexual explicit pictures or other materials, including by email and on the Internet
- Offensive or derogatory jokes or comments
- Verbal or physical abuse or threats.

Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with Human Resources or the Compliance Department.

Leadership capability

Management has the added responsibility of setting the tone at the top through their actions. Ethical behavior is the product of clear and direct communication modeled from the top and demonstrated by example. To make this CODE work, management from all levels have to be responsible for promptly addressing ethical questions or concerns raised by employees, TP or any person involved with PM.

Managers of all levels should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At PM, we want the ethics dialogue to become a natural part of daily work.

OPEN DOOR POLICY

It is PM's desire to establish transparent and flexible communication paths. Communication creates work conditions that are favorable to productiveness and a perfect environment. We encourage everyone to speak freely and openly about significant matters.

Everyone in PM have to be open for communication.

This policy dictates that supervisors, managers, and senior management are obliged to have the door to their offices open – if not down to confidential matters or reasons — so that employees can feel comfortable in accessing their spaces and that their voices can be heard.

This open door policy does not imply that there are not points that the employees have to observe:

- Some managers may be busy at times, so employees might have to schedule an appointment.
- Problems should be communicated to the immediate supervisor instead of bypassing them to reach a higher ranking manager.
- Constant and willful violation of the open door policy can be reported to the supervisor of the person who is responsible for the violations, Human Resources or the Compliance Department.

PROTECTION OF COMPANY RESOURCES

Company resources, including time, material, equipment and information, are provided for company business use. Everyone in PM is expected to treat the property of the company, whether material or intangible, with respect and care.

Intellectual Property

Intellectual property rights are crucial to protecting the investments of the company in developing new products and ideas.

We may not copy, reproduce or transmit protected material, such as writing, artwork, music, video, photographs, movie clips and software unless you have prior written authorization or license.

Confidentiality

Integral to PM's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, members of the Board of Directors, Customers, Team Partners Sponsors, and Business Partners.

We must use confidential information only for business purposes and disclose it only to those who are authorized and have a need to know. Even after we leave PM, we must continue to protect confidential information and no use or disclose it without prior written authorization.

Regardless of how it is saved, internal and personal information intended for business purposes is considered to be confidential unless otherwise specified or published by an authorized official of the company.

PM will consider any breach of the obligations under this article as extremely serious.

Any external queries must be forwarded to the authorized authorities.

Privacy

We are committed to protecting the privacy of everyone with whom we do business, including employees, members of the Board of Directors, Customers, Team Partners Sponsors, and Business Partners. We each have the responsibility to comply with our privacy and security requirements.

Individuals who have access to such personal information must ensure that the information is not disclosed in violation to the company's policies.

Company Email and technology

You are personally responsible for any of your online activity conducted with a PM-International email address, and/or which can be traced back to a PM domain, and/or which uses PM assets including the firm's PCs, smartphones or our network. Even if you are logged into your own personal account please know it can be traced to PM as it is being transmitted over the company's network with PM-owned technology.

The pm-international.com or any other PM domain address as well as related business addresses attached to your name implies that you are acting on the company's behalf. When using a PM email address or PM assets to engage in any

social media activity, be aware that all actions are public and employees will be held fully responsible for any and all said activities. If/when you are making personal comments please use a disclaimer in places where online communities know your PM affiliation, so that your opinions are known as your own and not reflective of the opinions of PM-International.

Ensure that you do not abuse the inbox of others by sending unsolicited attachments. Not only are unsolicited attachments rude, but they are also potential virus carriers. As much as possible, keep your email correspondence as text, with hyperlinks to items for download.

Avoid sending mass emails to online community members.

Security

In order to protect the interests of the PM network and our fellow employees, PM reserves the right to monitor or

review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or the company's intranet if and when there are reasons to believe that irregularities or breaches have occurred. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Information, specifically confidential information, must be protected from access to third parties or colleagues who are not involved. Everyone has to take appropriate security steps to prevent misuse and disclosure of information in their care.

Any attempt by unauthorized individuals to access confidential data constitutes a breach of the CODE and have to be reported immediately.

5. Uncompromising integrity of everyone in PM-International

OBEYING LAWS

PM's commitment to integrity begins with complying with laws, rules and regulations. We adhere to laws and requirements as a basic principle. The same is true for internal guidelines, principles and business regulations. We also respect the relevant laws, regulations and standards of the countries we work in.

Remember we are responsible for preventing violations of law and for speaking up if we see possible violations.

BRIBES, GIFTS AND COURTESIES

We should avoid any actions that create a perception that favorable treatment of outside entities by PM was sought, received or given in exchange for personal business courtesies.

Most business courtesies offered to us in the course of our employment are offered because of our positions at PM. We should not feel any entitlement to accept and keep a business courtesy.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing.

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment. These may not be inappropriately lavish, excessive or reflect a pattern of frequent acceptance of courtesies from the same person or entity.

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices.

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon PM.

CORRUPTION

The impartiality and integrity of civil servants must not be damaged.

No employee or TP may offer services without payment or guarantee a certain outcome for a test or certification process.

Bribery and persuasion payments are forbidden. Corruption is a criminal offence and usually leads to prosecution.

CONFLICTS OF INTEREST

Everyone at PM are 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 the company. 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. Employees with a conflict of interest question should seek advice from management. 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.

Personal gain

We must never use PM property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with the company.

Working with a competitor

You may not, without PM's consent, work for a competitor in any capacity.

Private personal time and work

We should be careful to avoid activities during our personal time that conflicts with the company's business interest.

You may not perform non-company work on PM's premises or during working hours, including time you are given with pay to handle personal matters.

You are not permitted to use PM's assets, including equipment, telephones, faxes, materials, resources or proprietary information for any non-company work.

Personal activities

PM understands the need for balance work, personal and family life, and we encourage our employees to be involved in their communities. You may keep your personal activities outside of the workplace confidential, but remember that you always represent PM-International.

If you are involved in the civic life of your community, keep in mind that such service may place you in a situation that poses a conflict of interest with PM. Before making any decision, please get advice from our Legal, Regulatory Affairs and Compliance Department and the civic organization's lawyer.

You must not make any political contributions as a representative of PM. When and if you speak out on public issues, make sure that you do so as an individual and not on the company's behalf.

Hiring Family and Relatives

Immediate family members and partners of employees may be hired in exceptional cases as employees or consultants only if it is based on qualifications, performance, skills and experience.

Both parties must work in different areas with minimum overlap or interaction between areas of responsibilities.

FAIR COMPETITION

We are dedicated to ethical, fair and vigorous competition. We do not participate in any activities which aim to achieve commercial advantages through illegal or unethical practices.

It is in our best interest to promote free and open competition.

When conducting PM business, we all have to:

- Avoid false and misleading statements about competitors.
- Respect the property rights of others.
- Not acquire or seek to acquire improper means 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.
- Never act in a manner that could be seen as an attempt to control the market.

INTEGRITY OF INFORMATION

All documents, files and reports, regardless of whether they are for internal or external use, have to be maintained in correct and official manner and contain accurate, true, reliable and authorized information.

6. Environment, Health and Safety

A number of environmental, health and safety laws, standards, requirements and policies apply to our global business operations, practices and products.

We actively encourage all people belonging to PM to consider the consequences of your actions on humans, the environment and society.

Our responsibilities are:

- Conserving water, energy and other natural resources.
- Managing wastes properly.
- Complying with environmental permits as well as health and safety requirements.
- All employees of PM are protected by standards relating to health and safety in the workplace. National laws and international conventions apply.

7. Passion for our Team Partners

General Conduct

TP shall safeguard and promote the good reputation of PM-International and its products and have to avoid all deceptive, misleading, unethical or immoral conduct or practices. TP have to exhibit high moral character in their personal and professional conduct. TP shall not engage in any conduct that may damage PM's goodwill or reputation.

WORKING WITH TPS

Trust and respect for individuals

We treat our TP as we treat one another, with dignity and respect. We respect their differences and understand their cultural differences. We embrace diversity in each other.

Code Enforcement for TPs: Our Subsidiaries Responsibility

TP are not bound directly to the CODE and other Policies, but are required to adhere to it as a condition of membership in PM's distribution system.

The primary responsibility for the observance of the CODE and other policies shall rest with each Subsidiary. In case of any breach of The CODE and other Policies by our TP, the local Subsidiary shall make reasonable effort to satisfy the complaint or infringement.

Each Subsidiary is required to designate a Policy Responsibility Officer (PRO) that is responsible for facilitating compliance with the policy, monitoring and communicating and reporting to the Compliance Department in the International HQ and following up with the violations until they are closed and dealt with. The PRO will also serve as the primary contact at the Subsidiary for communicating with

the violators as well as communicating the principles of the CODE and other Policies to the TP, customers and the general public.

TP'S CODE OF ETHICS

In order to ensure that the relationships between PM and the consumers are based on trust and fairness, we have adopted the provisions of the CODE as a condition of admission and continuing membership of PM.

A TP always has to act as an independent and responsible business entrepreneur and has to avoid any possible appearance of acting as an employee of PM or of being entitled to make declarations in the name of PM. A TP must avoid giving the impression to be representing PM. A TP does not have authorization to speak on behalf of PM or represent PM in any way other than as an independent distributor.

Everything a TP says about PM and PM's products must 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 TP attribute therapeutic or healing properties to PM products. A TP must avoid making any health claims at all times.

Conduct towards customers

The TP have to follow these rules:

- 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 costumers concerning the product and the offer.
- Only make verbal promises concerning the product which are authorized by the company.
- Inform costumers if the products ordered are unavailable.
- Do not abuse the trust of individual costumers.
- Respect the privacy of costumers.
- Do not unfairly denigrate another company, its products, its sales and marketing plan or any other feature of that company.

Distribution Activity of a TP elsewhere

Without the prior written consent of PM, it is not permissible for a TP to undertake activities for a competitor of PM. A competitor of PM is taken to be any company which offers goods or services through personal direct marketing or via a network marketing system as well as, independent of the means of distribution, all companies with products partially or fully in a position of competition to PM products.

A TP is obliged to keep every permissible distribution activity for another company completely separate from the activity for PM and with PM products.

It is not permissible to draw attention to activity for PM or the status as a PM TP, or to offer goods and services of the other company together with PM products, or to cause other TP of PM in any way whatsoever to purchase goods or services from the other company or to become active for the other company in addition to or instead of their activity for PM.

8. The Compliance Department

The Compliance Department in the International HQ will monitor, investigate and enforce compliance of everyone belonging to PM's observance of the CODE and the Policies by appropriate actions.

This department shall help the Subsidiaries settle any unsolved complaints based on breaches of the CODE and/ or Policies and shall work with the Legal department for any major violation cases.

EDUCATION AND TRAINING

The Compliance Department shall communicate the contents of this CODE and all other policies to all the employees and Subsidiaries.

The Subsidiaries shall communicate the contents of this CODE and all relevant policies to all the TP as a condition of membership in PM's distribution systems, to comply with The CODE and Policies.

Training and adequate education on the applicable codes and policies will be accomplished by:

- training sessions,
- written manuals and policies
- audio-visual material.

9. Reminders

LAW

PM-International complies with the requirements of law and therefore this CODE does not restate all legal obligations. PM never gives up its right to insist on compliance with these rules or with applicable laws.

STANDARDS

This CODE is evidence of our company standards. The CODE serves as a policy for conducting business with integrity. It is not an employment contract and confers no right relating to employment. It is not a complete list of company policies.

Everyone related to PM-International is expected to know and comply with all relevant company guidelines and policies.

PROCESSES FOR REVISION

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

OTHER MATERIALS

Any materials that are inconsistent with the CODE and other PM policies are prohibited.

CODE Tips

Employee awareness of how to make ethical decisions is part of good workplace practice. Our commitment to the highest ethical standards should guide all of our actions and decisions.

The CODE and all other PM Policies' goal is for employees to understand the values and principles, Managers to apply and encourage their application and Senior Management to demonstrate and reinforce them as part of the culture at PM. It establishes a common understanding not only for those of us who work in PM but for all who interact with us.

We are aware that rules, policies, regulations, and standard procedures can be overwhelming. We are creating on-the-job training to better understand local laws, health and safety regulations as well as PM-International's CODE and other policies.

As part of the PM family you are empowered. PM supports you in doing the right thing and conducting business with integrity and respect.

These *CODE Tips* may help you in your day-to-day work:

- Integrity is a core value in all aspects of our professional and personal life;
- Demonstrate and practice the PM values in our activities and behavior;
- Make decisions without consideration for personal gain;
- Show pride in our work and achievements;
- Demonstrate the highest standards of competence;
- Be motivated by professional objectives rather than personal concerns;
- Treat colleagues fairly and equally, with dignity and respect;
- Show respect for and understanding of diverse points of view;
- Examine our assumptions and avoid stereotypes;
- Show no discrimination against any individual or group;
- Promote the spirit of openness and transparency;
- Respect different people's, languages, cultures, customs and traditions;
- Never disclose or improperly use confidential information;
- Be accountable;
- Accept responsibility for your behavior;
- Be a man or woman of your word;
- Ignore peer pressure;
- Be courteous and respectful;
- Be respectful of confidentiality;
- Lead by setting an example;
- Pay attention to details;
- Raise concerns about any unprofessional or unethical behavior.

REMEMBER: You must resolve that you will never make an ethical decision without knowing what the rules are. Become comfortable asking your supervisor, manager, legal counsel, Human Resources or the Compliance Department for help. They will appreciate that you took the time to ask before jumping into an ethically uncertain situation.