



Declaration of undersigning

CODE OF CONDUCT

I,

NAME:

POSITION:

BASED IN:

DATE:

hereby declare to act in full according to this Code of Conduct as approved by the Supervisory Board of Rewilding Europe at its meeting on 29 November 2018.

1. General

This Code of Conduct applies to all managers, employees and team members (hereof: employees) of Rewilding Europe.

Rewilding Europe expects all of its employees to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities and to comply with all applicable laws, rules and regulations.

This Code was adopted for the purpose of fostering Rewilding Europe’s philosophy in:

- Daily operations of its rewilding initiatives and all related activities;
- Compliance with applicable laws and governmental rules and regulations;
- Honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflicts of interest;
- Ethical behaviour regarding giving and accepting gifts;
- Full, fair, accurate, timely and understandable disclosure;
- The protection of Rewilding Europe’s interests, opportunities and assets;
- Accountability for adherence to this Code and to promote the prompt internal reporting of any violations or apparent violations of this Code.

2. Honest and Candid Conduct

Each employee should act with integrity. Integrity requires, among other things, being forthright, non-discriminatory, honest and candid. All employees are committed to treat everybody with dignity & respect regardless of level or circumstance. We are committed to providing equal employment and advancement opportunities for all individuals without discrimination based upon an individual's race, colour, sex, national origin, age, religious creed, or any other characteristic protected by law. Employees are evaluated on the basis of their performance and will be provided with honest and fair feedback in this regard.

3. Fair Dealing

Rewilding Europe and its employees do not seek advantages through illegal or unethical business practices. Each manager and employee should endeavour to deal fairly with its service providers, suppliers, competitors, clients and employees. No manager or employee should take unfair advantage of anyone or any situation through manipulation, use of authority or position, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

4. Conflicts of Interest

A "conflict of interest" occurs when an individual's personal or private interest, financial or otherwise, interferes or appears to interfere with the interests of Rewilding Europe. A conflict of interest can arise when a manager or employee takes actions and has interests that may make it difficult to perform his or her work objectively and effectively. For example, a conflict of interest would arise if a manager or employee, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position within Rewilding Europe.

Any material transaction or relationship that could reasonably be viewed to give rise or potentially give rise to a conflict of interest should be discussed with a direct report, the Regional Manager, the Thematic Director or the Managing Director before the transaction proceeds to the point that a conflict of interest may be inferred.

Conflict of interest situations involving managers or employees who have procurement authority include the following:

- Any personal significant ownership interest in any business or venture that conducts business with Rewilding Europe;
- Any significant ownership interest by a member of his or her immediate family or direct relationship (e.g., friend, business partner) in any business or venture that conducts business with Rewilding Europe;
- Any outside business activity that detracts from an individual's ability to devote appropriate time and attention to his or her responsibilities with Rewilding Europe;
- The receipt of non-nominal gifts or excessive entertainment from any customer or company with which Rewilding Europe has current or prospective business dealings.
- Engagement in activities that are inconsistent with Rewilding Europe's best interests or that disrupt or impair the relationship with any person or entity with which Rewilding Europe has or proposes to enter into a business or contractual relationship.

5. Gifts

To ensure the integrity of our relationship with suppliers, clients and other parties and to maintain our professional independence the following policies regarding gifts must be applied.

All employees are forbidden offering or receiving anything of value where the item of value is offered with the intent of influencing the receiver in a business transaction.

All employees are expressly forbidden to accept any personal payment(s) in connection with business transactions.

Within the legal framework it is only permitted to give to or receive from business relations gifts that can be consumed or used up within one day (e.g., dinners, drinks). Money (cash, check, money order or electronic funds) is never allowed to be accepted or given and the gift should not, in any way, be in conflict with this Code of Conduct

Commissions (in whatever form and under whatever title) to third parties are only permitted if such payments have an obvious function in the promotion of a business interest of Rewilding Europe and meet the criteria:

- There must be a clear written agreement stating the reason for the payment;
- Its recording in the accounts must be subject to the normal audits;
- There must be no objection to the agreement being made known publicly.

6. Disclosure

Each manager or employee involved in Rewilding Europe's public disclosure process is required to be familiar with and comply with Rewilding Europe's disclosure controls and procedures and internal control over financial reporting, to the extent relevant to his or her area of responsibility. He or she should take all appropriate steps regarding these disclosures with the goal of making full, fair, accurate, timely and understandable disclosure. You are responsible for maintaining accurate records to the best of your knowledge.

7. Protection and Proper Use of Rewilding Europe's Assets

All managers and employees should protect Rewilding Europe's assets and ensure their efficient use. All assets should be used only for legitimate business purposes.