

## Code of Conduct

### 1. General

This Code of Conduct applies to the Supervisory Board, employees, contracted partners and consultants (hereof: RE-stakeholders) of Rewilding Europe (together referred to as “RE-stakeholders”)

Rewilding Europe expects all of its RE-stakeholders 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 RE-stakeholder should act with integrity. Integrity requires, among other things, being forthright, non-discriminatory, honest and candid. All RE-stakeholders 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. RE-stakeholders are evaluated on the basis of their performance and will be provided with honest and fair feedback in this regard.

RE-Stakeholders are urged to report, without delay, any misconduct, whether proven or not, of any RE-Stakeholder, to the Confidential Counsellor. Failure to report misconduct will be treated equally to the unreported misconduct, and may trigger summary dismissal and legal action.

### 3. Fair Dealing

Rewilding Europe and its RE-stakeholders do not seek advantages through illegal or unethical business practices. Each RE-stakeholder should endeavour to deal fairly with its service providers, suppliers, competitors, clients and other RE-stakeholders. No RE-stakeholder 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 an RE-stakeholder 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 the direct supervisor or principal, or, in his/her absence, the direct supervisor of the RE-stakeholder’s direct supervisor, before the transaction proceeds to the point that a conflict of interest may be inferred.

Conflict of interest situations involving RE-stakeholders 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 RE-stakeholders 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 RE-stakeholders 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**

All RE-stakeholders 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 RE-stakeholders should protect Rewilding Europe’s assets and ensure their efficient use. All assets should be used only for legitimate business purposes.

**Signed for having read, understood and agreed with this Code of Conduct**

Name: .....

Signature: .....