



Earth Animal Code of Ethics

updated June, 2022

Earth Animal has always been committed to being the most mindful and trusted company in the pet industry by exploring another way - a more sustainable, effective, and better approach to all we do - from our purpose & principles that guide us and the products we create, to the partners we work with and the people we hire.

We are committed to providing a diverse, equitable and inclusive (DEI) environment for our employees. We know that multiple voices drive innovation and creativity, which leads to global success. We want to create and foster an environment where every employee feels included, heard, and where they can bring their whole self to work and reach their full potential.

We are committed to upholding a rigorous code of ethics to ensure a company that operates within the values that are the foundation of the brand.

I. Personal and Professional Integrity

All staff and Board Members act with honesty, integrity, and transparency in all their dealings with each other and as representatives of the organization. The organization promotes a working environment that values respect, fairness, integrity, and collaboration.

II. Governance and Accountability

Earth Animal is a registered Public Benefit Corporation which requires that the company consider people and the planet — as well as profit — in our business model and operations, incorporating stakeholders like employees and community as beneficiaries.

For Earth Animal, PBC classification is a way to advance the brand's core values and demonstrate their commitment to transparency, excellence, and integrity. Public benefit corporations delineate a specific benefit purpose and must conduct rigorous reporting on its ongoing efforts, progress, and wider impact. With this formal distinction, Earth Animal will officially and publicly balance shareholder interests with environmental, social, and governance performance.

III. Fairness and Justice

As professionals, we are ethically responsible for promoting and fostering fairness and justice for all employees and stakeholders in order to create and sustain an environment that encourages all individuals and the organization to reach their fullest potential in a positive and productive manner.

- * Respect the uniqueness and intrinsic worth of every individual.
- * Treat people with dignity, respect and compassion to foster a trusting work environment free of harassment, intimidation, and unlawful discrimination.
- * Ensure that everyone has the opportunity to develop their skills and new competencies.
- * Assure an environment of inclusiveness and a commitment to diversity in the organization.
- * Develop, administer and advocate policies and procedures that foster fair, consistent and equitable treatment for all.
- * Regardless of personal interests, support decisions made by our organizations that are both ethical and legal.
- * Exercises reasonable care, good faith, loyalty and due diligence in organizational affairs;
- * Ensures that the organization conducts all transactions and dealings with integrity and honesty.

IV. Legal Compliance

The organization is knowledgeable of and complies with all applicable laws, regulations, and international conventions.

V. Financial Stewardship

The organization manages its funds responsibly and prudently. This includes the following considerations:

- * It spends an adequate amount on administrative expenses to ensure effective accounting systems, internal controls, competent staff, and other expenditures critical to professional management;
- * It compensates staff, and any others who may receive compensation, reasonably and appropriately;
- * It ensures that all spending practices and policies are fair, reasonable, and appropriate to fulfill the mission of the organization; and,
- * It ensures that financial reports are complete and accurate in all material respects.

VI. Transparency and Disclosure

The organization provides comprehensive and timely information to stakeholders and is responsive in a timely manner to reasonable requests for information. This includes traceable ingredients and sourcing in products, testing results, and access to product development team.

VII. Inclusiveness and Diversity

Earth Animal provides equal employment opportunities to all employees and applicants for employment without regard to race, color, ancestry, national origin, gender, sexual orientation, marital status, religion, age, disability, gender identity, results of genetic testing, or service in the military. Equal employment opportunity applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training.

The Company expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above. Improper interference with the ability of other employees to perform their expected job duties is absolutely not tolerated.

VIII. Harassment Policy and Complaint Procedure

It is Earth Animal's policy to provide a work environment free of sexual and other harassment. To that end, harassment of Earth Animal's employees by management, supervisors, coworkers, or non-employees who are in the workplace is absolutely prohibited. Further, any retaliation against an individual who has complained about sexual or other harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. Earth Animal will take all steps necessary to prevent and eliminate unlawful harassment.

All employees should take special note that retaliation against an individual who has complained about sexual harassment and retaliation against individuals for cooperating with an investigation of sexual harassment complaint is unlawful and will not be tolerated at Earth Animal.

IX. Complaint Procedure.

Any employee who believes he or she has been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is requested and encouraged to make a complaint. Similarly, anyone observing acts of discrimination toward or harassment of another employee, are requested and encouraged to report this to one of the individuals listed above.

No reprisal, retaliation, or other adverse action will be taken against an employee for making a complaint or report of discrimination or harassment or for assisting in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately.

X. Conflicts of Interest

Earth Animal expects all employees to conduct themselves and company business in a manner that reflects the highest standards of ethical conduct, and in accordance with all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interests, improper behavior, unacceptable personal integrity, or unacceptable ethics.

Employees are expected to:

- * Adhere to and advocate the use of published policies on conflicts of interest within the organization;
- * Refrain from using one's position for personal, material, or financial gain or the appearance of such;
- * Refrain from giving or seeking preferential treatment in the human resources processes;
- * Prioritize obligations to identify conflicts of interest or the appearance thereof;
- * When conflicts arise, disclose them to relevant stakeholders.

XI. Whistle Blower Policy

In keeping with the policy of maintaining the highest standards of conduct and ethics, Earth Animal will investigate any suspected fraudulent or dishonest use or misuse of its resources or property by staff or consultants.

Staff and volunteers are encouraged to report suspected fraudulent or dishonest conduct (i.e., to act as "whistle-blower") to the Head of People. Complaints will only be shared on a need-to-know basis and Whistleblowers will be protected against retaliation. Whistle-blowers must be cautious to avoid baseless allegations.

All relevant matters, including suspected but unproved matters, will be reviewed, and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate

corrective action will be taken, if necessary, and findings will be communicated back to the reporting person and his or her supervisor. Certain matters may warrant investigation by an independent person such as auditors and/or attorneys.

XII. Anti-Corruption Statement.

Earth Animal is committed to operating in an ethical manner and in compliance with applicable anti-bribery laws and regulations in the United States and other jurisdictions in which it operates. It is our policy to prohibit the direct or indirect giving or receiving of improper payments or other benefits for purposes of obtaining any advantage. More specifically, Earth Animal staff may not directly or indirectly:

- * Make, promise, approve, authorize, or offer to give to anyone anything of value (including but not limited to cash payments) for the purpose of improperly inducing the recipient to take (or to refrain from taking) action that would bestow a benefit on Earth Animal or any other party; or
- * Receive or accept anything of value (including but not limited to cash payments), if such item of value is intended to induce or reward improper performance of one's responsibilities or duties or to gain an improper advantage.

XIII. Use of Information

We consider and protect the rights of individuals, especially in the acquisition and dissemination of information and data.

- * Acquire and disseminate information through ethical and responsible means.
- * Safeguard restricted or confidential information.
- * Protect the privacy of customers and stakeholders by not sharing or selling any data collected through the course of business.