



COMMUNICATION ON PROGRESS

2018



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WELCOME MESSAGE FROM ANTHONY J. ARCHER

Primal Group celebrates one more year as a member of the United Nations Global Compact and reaffirms its commitment to the Ten Principles in the areas of Human Rights, Labor, Environment, and Anti-Corruption. The following report comprises all the actions and endeavors that Primal Group has undertaken over the course of the past year in order to adhere to these principles.

*“Doing Good for the World,
by Doing Good Business”*

Our philosophy comprises not only the economics of farm management but incorporates social and environmental impacts so that we ensure positive externalities across all our spheres of influence. We adhere to a synergy of People, Planet and Profit that guides every aspect of our business. Through these three factors, we are able to ensure that our practices have a positive impact on society and the environment, while also securing safe returns for our stakeholders.

The current state of global affairs makes the Sustainable Development Goals more important than ever. Primal Group believes it is key to take these principles as guiding lights, rather than simple guidelines, and contribute to a more socially responsible business world, that will in turn usher a new era in our human evolution: A synergy with our environment in which profits and sustainability are no longer considered different concepts.

We made remarkable progress in 2018 and plan to continue fueling our momentum by maintaining full commitment to the UN Global Compact and continuously integrating its principles into our daily actions and future strategies.

Sincerely,

Anthony J. Archer
Chief Executive Officer
Primal Group

OUR COMPANY

The Primal Group of Companies is dedicated to establishing itself as a lead organization, driving change to create a more tenable future for our planet by ensuring environmental protection, social responsibility and value-creation, for generations to come.

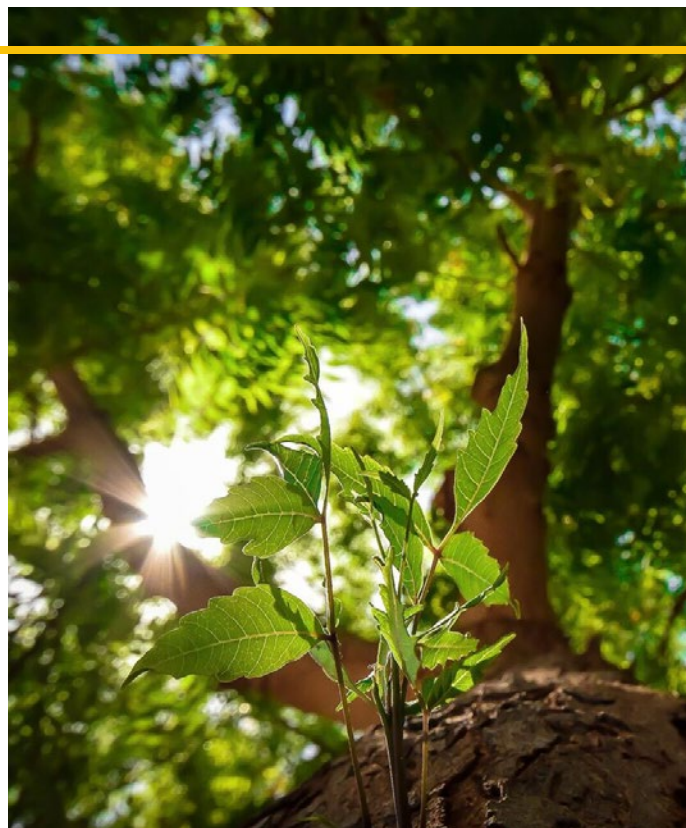
Consisting of a variety of companies, Primal Group's mission is to create a world that utilizes futuristic knowledge, technology and advancements, to create a sustainable reality through business models that protect and nurture the environment, while creating value and profits.

Impact investment specialists in evolving a sustainable future, Primal is dedicated to providing solutions that ensure lower risk and higher returns over traditional asset classes. We engage in high impact investment projects that offer sustainable solutions to the world's most significant challenges, selected through our Primal criteria spanning environmental, social and economic impact. Safe, regenerative and transparent practices are at the very core of Primal's operations, with each and every element of Primal's production process prioritizing environmental care, be it while planting trees or while manufacturing products with recyclable and biodegradable packaging.



OUR VISION

Ensuring a sustainable food supply has been mankind's most significant challenge throughout history, one that has been compounded by the unprecedented increase in the global population over the last century. Conventional agricultural techniques, which arose from the necessity to increase agricultural yields, have come at a high cost for humanity, with the excessive use of chemical agricultural inputs contributing to human health risks, environmental degradation and resource depletion. The archaic system of the current industry needs to be transformed into one that guarantees the needs of all are met in a safe and sustainable way. At Primal, we believe the neem tree, as a crop care solution that delivers effective protection and high yields without harming the environment or human health, has the power to transform the future of agriculture and food production. This unique resource offers natural and innovative solutions where they are needed the most – across agriculture, healthcare, and environmental protection.



OUR STRATEGY

Operating the world's largest commercial neem plantation in Ceara, Brazil, has turned us into a global leader in sustainable agriculture. Currently, we are on our way to becoming the world's first fully vertically integrated neem business. Through regenerative and organic practices, assisted by the latest technology, we are ushering a new era for agriculture; one that guarantees higher yields by nurturing the soil and the surrounding ecosystems. This year our agricultural project has been joined by our natural, neem-based beauty and personal care brand, ViTA. Using the world's first and currently only 100% OceanBound recycled bottles, made from plastic found in high-risk coastal areas where plastic waste is most likely to pollute the ocean, ViTA is playing a lead role in keeping the oceans plastic-free. At the intersection of sustainability and technology, we are constantly on the lookout for new business models that can satisfy the most fundamental requirements for life and secure a safe and prosperous future for us all - be it in the agriculture or the beauty industry, we believe the only way forward is through social and environmental responsibility.





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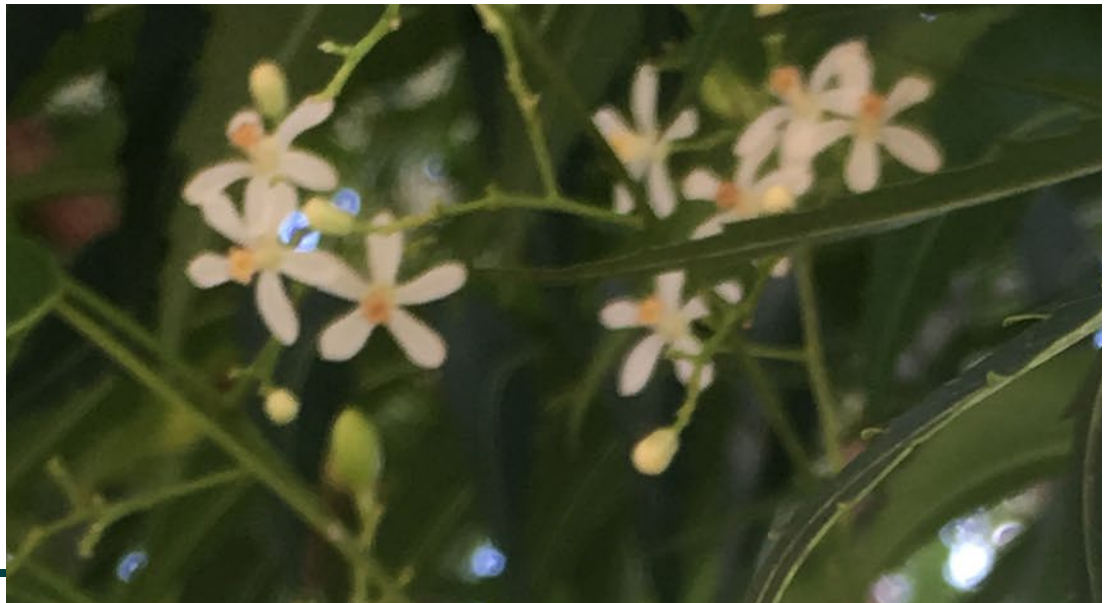
NEEM

THE UNITED NATIONS'

TREE OF THE 21ST CENTURY







The neem tree (*Azadirachta Indica*) is a fast-growing species, which grows about 2.6 feet (80cm) every year and can reach up to 100 feet (30 meters) when fully grown. The scientific interest in the tree started in the 1950s, much of it centered on the oil from the fruit. One of its main active ingredients from the more than 250 compounds is *azadirachtin*, which has a complex chemical structure that provides much of neem's potency and unique anti-bacterial, antiviral, and anti-fungal properties.

For centuries, the neem tree has been known as "The Village Pharmacy" in India, providing hundreds of uses that have ranged from treating diseases to feeding cattle. Today, the tree is being studied for its multiple uses and applications across agriculture, beauty and personal care, healthcare, and environmental protection. The neem tree truly is an agro-scientific celebrity and it is not without reason that it has been declared the "Tree of the 21st Century" by the United Nations.





As the largest commercial neem plantation globally, we are developing agricultural best practices through knowledge and research when it comes to optimal nutrition and management for our neem trees.

Agriculture

Neem offers a diverse range of applications across the agricultural sector. Natural and effective, it is an organic alternative for synthetic pesticides that is effective against over 600 species of pests. Biodegradable and non-toxic to mammals and beneficial pollinators, *azadirachtin*, disrupts the growth cycle of insects and deters them from feeding on plants.

Doubling as a fertilizer, neem even nourishes the soil by improving water retention and increasing its nitrogen, phosphorous, potassium, calcium, and magnesium content. Neem oil is also an extremely effective, natural fungicide that disrupts cells and interferes with metabolic processes, without posing harm to humans or the environment. As a very promising solution to the overuse of antibiotics in agriculture, neem's antimicrobial properties eradicate microbes and bacteria that cause infections and disease in livestock, without creating resistance.

Health

With over 200 compounds proven to be effective against cancer, malaria, diabetes, inflammation, infection, fever, influenza, skin disease and dental illness, neem is a solution to a variety of ailments. Over the past twenty years, major institutions have published several thousand papers exploring the plant's effectiveness as a natural medicine.

Environment

In the age of climate change, planting more trees worldwide is a practical way to cleanse our environment through long-term carbon entrapment. For those examining the benefits of planting trees, neem trees tick many of the boxes for its suitability.

A hardy, drought resistant tree, with a thick foliage, very high leaf surface area and wide canopy, neem has the capability to provide a shield against other pollution components, with a sequestration capacity of 12.27 tons per tree per year. With its extensive and deep root system, neem can flourish and grow even in poor and leached soils.

At Primal, we have chosen to harness the power of the neem tree, which we believe will become a key crop in the future, offering innovation, multi-industry demand and a viable and sustainable solution to the global food crisis.

The Life of Neem

Named 'Arista' in Sanskrit - meaning 'perfect, complete and imperishable'



Leaves

Containing most active ingredients found in the seeds but in a much lower concentration, the leaves are considered the most versatile part of the tree. Now used as a pesticide, fertilizer and animal feed, the leaves were originally used as a medicinal tea in Indonesia



Flowers

The flowers are the part of the tree with fewer uses, however, given the flowers' sweet, honey-like smell, the flowers are used in aromatherapy for a calming and restorative effect



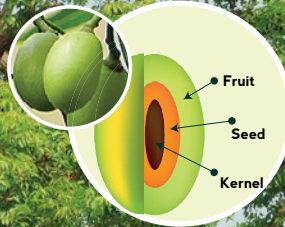
Twigs

Whilst used in commercial tooth pastes and mouthwashes, twigs have most notably been used as brushes for generations in India



Oil

Extracted from the kernels inside the seeds, where a single seed may contain up to 50% oil by weight, the oil is recognized and valued as a safe and effective bio-pesticide for organic farming. The oil has also been widely studied due to its medicinal properties and is also used in a variety of cosmetic products such as creams, soaps and shampoos



Bark

Neem bark contains spermicidal properties and research is undergoing to approve its potential use as a sexual contraceptive for both women and men



Cake

After the seeds have been pressed for oil, the resulting by-product is the neem cake. Neem cake is used across the agriculture sector as an effective pesticide, fertilizer and anti-bacterial, anti-fungal organic alternative to antibiotics in livestock



Roots

The roots of a neem tree also have different medicinal properties due to being antiseptic, antibacterial, anti fungal and germicidal. They are also used as a pesticide and to control fleas and ticks on pets



Pesticide

Neem-based organic pesticides are effective against 600 insect species. As a fertilizer, neem also reduces soil alkalinity and ensures optimum fertility



Medicine

All parts of the neem tree can be used for the treatment of inflammation, infection, fever and skin diseases



Cosmetics

Containing a high level of antioxidants, neem is used in organic soaps, shampoos and hydrating creams



Cattle feed

Neem is used as an organic and nutritional supplement that is effective against internal nematodes



Fertilizer

Neem improves the nutritional value of the soil while protecting plant roots from pests and diseases



Timber

Derived from the mahogany family, Neem is an extremely durable wood ideal as a construction material



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COMMUNICATION
ON PROGRESS 2018





In the last year, Primal Group has evolved in all aspects, with our mission to revolutionize the business world continuing to be our guiding light. We continuously look towards the articles of the Global Compact as the core of our mission to provide the world with solutions rather than merely being another company focused on the bottom line.

We have always worked and continue to work towards a more socially responsible planet, and we know this starts with our company, by implementing social responsibility and sustainability into all of our practices across our global presence.

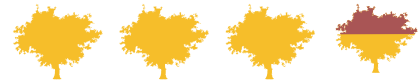
This strategy is directly tied to our commitment to the Global Compact since 2015. Through both our words and our actions, we are committed to becoming a force for change and a clear example that sustainability and profits are an attainable reality that will define the business world of the future.



Geographic presence



- ▶ United States of America
- ▶ Mexico
- ▶ Brazil



360,000
Neem trees
were planted

Nationalities working for Primal Group



Our current operations
comprise management of over

1,200 hectares
(c. 3,000 acres)
of agricultural land

using only natural, sustainable and
regenerative crop care solutions.

HUMAN RIGHTS PRINCIPLES

1st Principle

Businesses should support and respect the protection of internationally proclaimed human rights.

2nd Principle

Make sure that they are not complicit in human rights abuses.



Primal Group believes in corporate social responsibility as the basis for ensuring human rights and needs. We are committed to protecting and assuring every human right as essential to all members of the communities we engage.

During the last year, Primal Group has maintained a commitment to the United Nations Global Compact Principles related to human rights and the Universal Declaration of Human Rights via policies and practices that reinforce the compliance and defense of every fundamental human right. The practices established over the course of the last 12 months are especially related to the following primary human rights:



- **Article 2:** Everyone is entitled to the same human rights without discrimination of any kind.
- **Article 18:** Everyone has the human right to freedom of thought, conscience, and religion.
- **Article 19:** Everyone has the human right to freedom of opinion and expression.
- **Article 20:** Everyone has the human right to peaceful assembly and association.
- **Article 22:** Everyone has the human right to social security and to the realization of the economic, social and cultural rights indispensable for dignity.
- **Article 23:** Everyone has the human right to work, to just conditions of work, to protection against unemployment, to equal pay for equal work, to sufficient pay to ensure a dignified existence for one's self and one's family, and the human right to join a trade union.
- **Article 24:** Everyone has the human right to rest and leisure.
- **Article 25:** Everyone has the human right to a standard of living adequate for health and well-being, including food, clothing, housing, medical care and necessary social services.
- **Article 29:** Everyone has duties to the community.

These articles represent the core of our philosophy of respecting and protecting the rights of all people. At Primal, we strive to not only provide our employees with a job but create a relationship which allows them to enjoy a safe environment where they can thrive.

The betterment of our employees is part of our mission as a company to transform current business models into symbiotic relations, where people obtain as much from the company as they give and in turn put back into the land as much as they take.

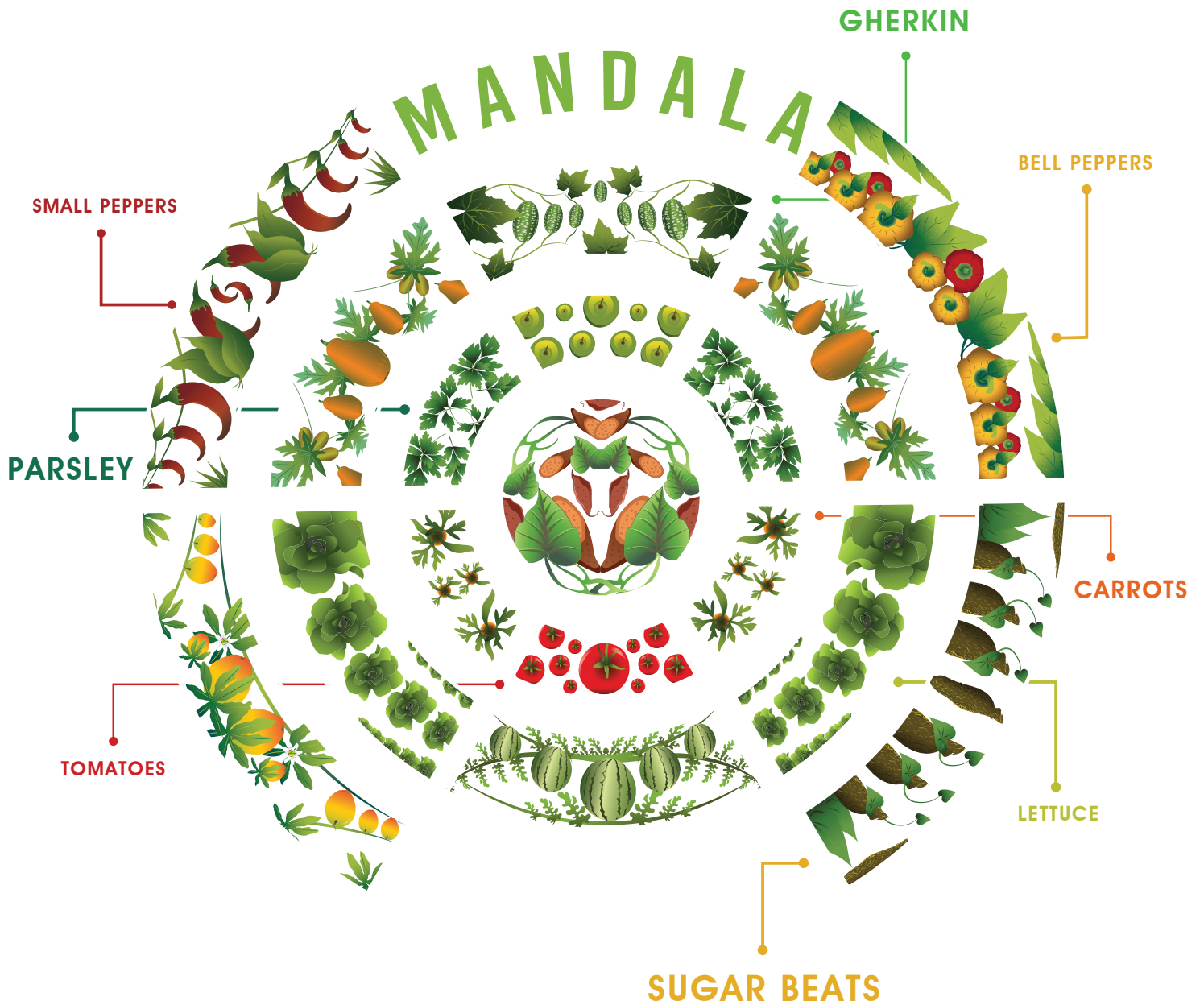
Primal Group has maintained its commitment to Human Rights via the development of initiatives that have created the following policies:

- Responsible and transparent activities across all levels of our business operations, demonstrating respect and support for all employees and business partners.
- Educational sessions for our employees on topics such as Gender Equality, Sexual Education and other topics related to fundamental human rights.
- Regular monitoring and reporting on our progress in upholding Human Rights across all parts of the business, using the Communication on Progress report as our principle communication strategy for reporting on our constant work for human rights.
- Engagement with local communities involving outreach, educational programs and voluntary initiatives that support human rights. With our Sustainable Future Initiative (SFI) we regularly provide produce to local schools and education on sustainable farming methods. We have provided schools with produce such as sweet potatoes, maracuja, papayas, apples and watermelon, among others.



Our Mandala is part of our Sustainable Future Initiative Project, through which we are teaching an organic agricultural system through practical exercises, thereby increasing awareness of regenerative agriculture and the drastic impact of traditional methodologies.

Each cycle at the Mandala produces





By constantly providing our employees with training, we can ensure their safety and development, keeping them updated on the most innovative agricultural practices.

Our employees come from all parts of Brazil, and have different backgrounds, perspectives and beliefs. We make sure that they have the liberty and space to practice their own beliefs and express their thoughts freely.

To safeguard our workers from issues such as workplace harassment, including physical, verbal, sexual or psychological harassment, abuse or threats, we continue to use a complaint mechanism based on a suggestion box at our plantations and administrative offices to obtain complaints, comments, and requests from our workers.

Every complaint is submitted to a process of review and verification by the General Manager to assure we are fulfilling our duty to eliminate discrimination, harassment, and victimization at our company. During our monthly integrated sessions, employees are informed about their rights and given a safe space to express their thoughts and opinions.

Due to our processes, protocol and culture, we have only received one minor complaint this year. We have further improved our communication with our employees through our initiative **Internal Commission for Accident Prevention (CIPA)**, which consists of our employees selecting three representatives and the subsequently our company selecting three representatives to address topics our employees would like to discuss and define actions for improvement. These meetings are supervised by a third party, in the form of a security technician hired by the company.

LABOR PRINCIPLES

3rd Principle

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

4th Principle

The elimination of all forms of forced and compulsory labor.

5th Principle

The effective abolition of child labor.

6th Principle

The elimination of discrimination in respect of employment and occupation.



Primal Group safeguards and promotes basic rights for workers across our global presence. Our ever-growing work force and the positive reputation of our project in the local community are proof of the success of our efforts.

Our employees are offered above minimum wage remuneration and various opportunities to advance and grow within the company, as we constantly provide them with performance reviews and guidance to ensure they can competently fulfill their roles. We are proud to offer additional benefits such as training, educational events and monthly sessions where we increase awareness about environmental issues, social concerns, labor rights, and working policies.

The following are a few examples of the subjects covered in 2018:

- **Our Company:** Introduction to Our Company, Internal Regulations of the Company and Performance Evaluation, Training in the Handling and Application of Natural Pesticides, Health and Safety at Work, Neem and its Properties
- **The Environment:** Ocean Pollution, Life Below Water (SDG 14), Sustainable Management of Recyclable Materials, Awareness for Use of Solid Waste, Zero Hunger and Sustainable Agriculture (SGG 2)
- **Human Rights:** Sexual Education, Gender Equality





Rather than just providing our workers with employment, we give them access to a career in a project that is creating a new standard in organic agriculture.



Our tractor drivers recently received lessons on the most efficient way to drive their tractors on our plantations, in order to ensure they conserve fuel and protect our trees and wildlife.

In alignment with our labor principles we have further elaborated the 'Fazenda Pack', our training manual for all agricultural employees. As an informative training and development tool, this comprehensive document introduces and educates principles of sustainable agriculture across our team in Brazil, including crop-specific management practices for both neem and coconut trees.

The Fazenda Pack is part of our mission to ensure a healthy, safe and positive work environment for all our employees aligned with our commitment as part of the Global Compact. It ensures that we transmit our values to our workers and inform them that the activities in which they are involved go beyond employment - they are an integral part of our future and share our vision with the local community.

Primal encourages its suppliers both national and international to adhere to the same labor principles that guide our company. In this way we go beyond our company in order to become an influential force in worldwide labor practices.

At Primal, we constantly strive to go beyond the traditional company-employee relationship, which consists of a simple exchange of services for pay. Instead, we inspire our employees to help us disrupt current business models and take this message to all communities within reach in order to further influence change.

We have built a mechanics workshop to ensure regular maintenance of our tractors. Fabio Moreira de Sousa, our best tractor driver, was chosen for the position of Head of Machinery and Mechanics and sent on a 3-week long preparation course.

This is part of our commitment to help our employees grow and pursue promising careers within our company.

ENVIRONMENTAL PRINCIPLES

7th Principle

Businesses should support a precautionary approach to environmental challenges.

8th Principle

Undertake initiatives to promote greater environmental responsibility.

9th Principle

Encourage the development and diffusion of environmentally friendly technologies.



At Primal, our greatest challenge is to transform traditional agriculture into one that guarantees the nutritional needs of all are met in a safe, healthy and sustainable way. In order to achieve this objective, we continuously preserve and restore critical habitats, carefully manage our resource supply and naturally improve the condition of our soil and crops. Primal Group's mission is to secure high yields in order to solve the global food crisis through organic, sustainable and innovative techniques.

To enhance and promote greater environmental responsibility, we have implemented unique strategies, which improve our production processes and guarantee environmental protection. These efforts are focused on sustainable plantation techniques, renewable energy, waste and water management as well as wildlife restoration.



The Catinga Puffbird, which inhabits our plantation, is a species endemic to Eastern Brazil.



Our young neem trees are surrounded by native vegetation in order to avoid monoculture and protect the trees from pests.



Through regular nutrient application and analysis, we ensure optimal soil conditions for our trees.

SUSTAINABLE PLANTATION TECHNIQUES

Sustainability is about knowing the value that every ecosystem has. Every part of our process involves making sure that we balance the ecosystem through proper nutrition which is key for the promotion of microorganisms. We achieve this through the use of innovative techniques and state of the art technology:

Intercropping

Monocultures are one of the most damaging practices in conventional agriculture. The absolute lack of any other vegetation outside of the chosen crop creates an imbalance that deteriorates the soil and promotes large-scale pest infestation. We constantly implement and test new intercropping techniques in order to obtain the highest yields and the biggest benefits for our crops and the environment.

Low Till Land Clearing

As part of our regenerative and organic agricultural practices, we never uproot or completely clean an area. When an area is brush cut, we ensure that what is cut is left on the ground and surrounding environment, so that it can nurture the soil and add nutrients to the environment as it naturally decomposes.

Precision Crop Care

Throughout the year, we apply various strategies to significantly reduce the use of our organic pesticides and fertilizers. Through chemical analysis of the soil, our agronomists determine the pH levels, alongside the nutritional and physical composition of the soil.

The soil is then assessed for natural mineral requirements, with gypsum and limestone added to reduce aluminum levels and enhance the soil's physical qualities. Limestone helps raise pH levels, reducing aluminum content and providing calcium, while gypsum provides sulfur and conditions the soil for better root growth.

This nutrient application is done several times a year across the plantation, to ensure the health of our soil by applying the exact amount of nutrients needed. To further ensure the use of natural inputs is kept to a minimum, we have recently purchased a mist applicator, which uses less water or carrier to apply insecticides, fungicides, disinfectants and even fertilizers to crops. This low-volume machine reduces the amount of solution needed by creating droplets so small that the surface area covered is significantly more than with alternative applications.

Farm and Analytics Report

Agrivi analytics allow dashboard views of all farming activities, including but not limited to: input usage, man hours, machinery hours, ROI, crop yield per sector and financial oversights. This not only ensures visibility and identification of high cost areas across the project, but also enables us to minimize our use of natural and organic inputs.

AgTech

The implementation of drone technology has added a superior level of analysis across our projects, with the capacity to evaluate a variety of field metrics at a faster rate than ever before. Information and data are collated through our two high-tech drones and processed through *Precision Mapper*, industry leaders in map and data processing and analysis. Aerial and sensor analysis give a unique opportunity to scan and view areas as a whole, creating an understanding and visualization of the conditions of all areas of the project.

The benefit of implementing such technology is the ability to scale up over time, while ensuring the plantation is managed in the most sustainable way possible. Future additions of attachments like ground sensors and IoT devices that connect with our drones, will enable us to stay at the cutting edge of technology-integrated management.

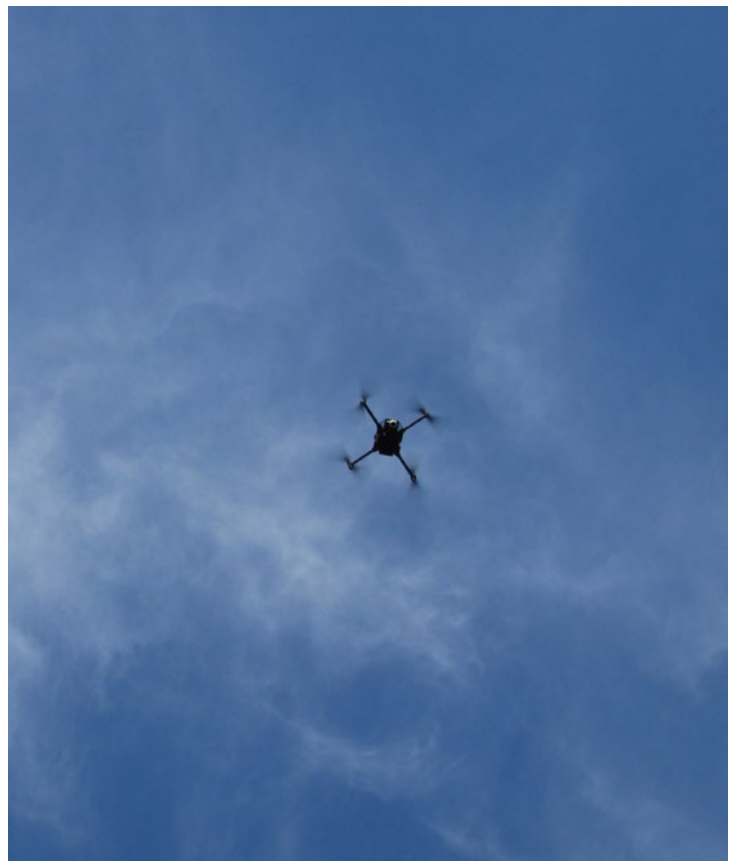
Our agronomists work closely with national and state entities in order to develop the best crop care methodologies. We work alongside the Brazilian Agricultural Research Corporation *EMBRAPA*, in order to continually learn and improve our understanding and practices and achieve our joint goals.



Technology integration and data-driven agricultural management are integral parts of our strategy to implement the most efficient and sustainable farming strategies across our projects.



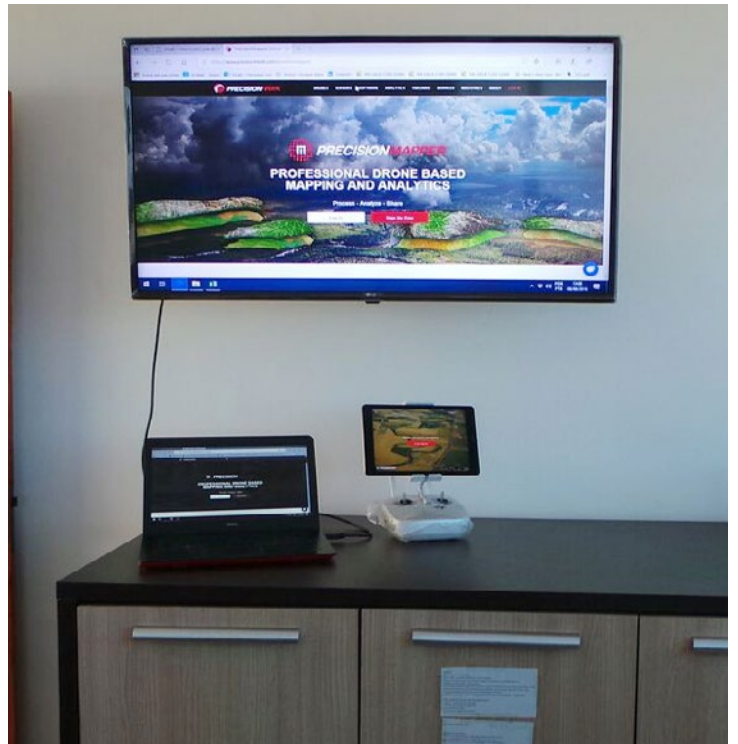
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Our agronomists have become adept at drone flight and analysis over the last year.



The normal drone view provides a camera view of the trees and allows for general inspection.



Drone technology allows us to proactively locate the areas that require additional agricultural organic inputs.



Our eco-dam has a capacity of 7, 834,000 cubic meters.

WATER MANAGEMENT

We are constantly looking for the most efficient and environmentally safe methods to bring water to irrigate our plantations. This is achieved through the smart and efficient use of water and frequent monitoring of our infrastructure.

Eco-Dam

Our dam has a capacity of 7,834,000 cubic meters, and an area of 37 hectares. The average rainfall is 1160 mm per year, the maximum flow rate of the dam is 43.78 m³/s, the width of the spillway that has not yet been completed, will be 50 meters long.

Precision Irrigation System

Our irrigation system allows us to determine and to use the specific quantities of water required without wasting water. We constantly monitor our irrigation lines in order to make sure that there are no leaks or damages.

RENEWABLE & CLEAN ENERGY

Energy consumption to maintain an agricultural project as big as our own is something which we constantly work to improve in a sustainable manner. Fossil fuel emissions are the biggest contributors of CO₂ and as a sustainable company, we are in a constant search for partners and technologies that will eventually lead us towards our goal of utilizing 100% clean and renewable energy on our agricultural projects while reducing demand for fossil fuel energy generation through our Zero Carbon Footprint Plan.

We intend to remove our reliance on the Brazilian National Grid for our energy needs, offering a sustainable way to fulfill our energy requirements necessary for running a large-scale agricultural project through renewable sources.



WASTE MANAGEMENT

Primal Group looks to lead the way in waste management through proper use, disposal and recycling, and by teaching a culture of proper waste disposal to our employees and encouraging them to get involved in company recollection programs. In addition, our personal care brand, ViTA, is a leader in sustainable packaging designed to divert plastic waste from entering the world's oceans.

Waste Recycling

We have been working with ECO+, a local company specialized in collection and recycling of wastes. This company has been working to collect, transport and recycle our disposals in a sustainable way, with the goal, not only to preserve the local environment and ensure a clean area for the right development of our trees, but to ensure that our waste does not become trash somewhere else. In 2018, we have recollected 14 m³ of recyclable waste, which are being processed to convert them into new materials and objects.

Plastic Challenge

We tackle plastic waste on a daily basis by analyzing our needs and determining in which areas we can steer clear of using plastic products or reduce the number of plastic products used, for example by ordering products in bulk.

We continue to implement our PET DRIVE, which is a program that encourages our employees to collect as many plastic bottles as possible. The employee who collects the most plastic bottles is recognized and rewarded.

Plastic bottles are collected in order to find different uses for them across the plantation and prevent them from polluting land and sea. For example, we have designed traps with plastic bottles to naturally control pests and reduce populations of insects across our plantations.

To ensure we are at the highest level of expertise in these areas, we have sought local experts to guide us through laws, customs and cultural nuances. Our environmental consultant functions as a guide as well as an audit to keep us innovating and implementing sustainable practices.



Together with our employees, their families and kids from local schools, we traveled to the beaches near our plantations and collected plastic and waste in order to send it to a recycling facility.

BEACH CLEAN-UP

This year's PET Drive ended in our "Praia Limpia" (Beach Clean-Up) Initiative. Together with our employees, their families and kids from local schools, we traveled to the beaches near our plantations and collected about 4 tons of plastic which we sent to a recycling facility.

At the beach the participants had the opportunity to experience plastic pollution and its impacts first-hand when one of the kids found a turtle which had died due to a piece of plastic wrapped around its body. This gave our team members the opportunity to educate employees, their families and kids in the crucial importance of reducing plastic waste. The day included a lunch provided by Primal for everybody involved in the clean-up efforts.

Over the course of this year's PET Drive initiative we were able to gather 14,000 PET bottles. The winner of this year's initiative was our employee Antônio Carlos Carneiro, with a total of 6,457 pet bottles! For his efforts Antônio was rewarded with a new bicycle and other prizes were handed out to employees who collected large amounts of pet bottles.

As part of our commitment to drive change in the local community, our regular plastic collection efforts contribute to relieving the weight of the tourist season on local beaches and encourage the community and tourists to keep the beaches clean. Through words and actions, our initiative is already permeating through the local community and demanding a broader scope.

On a global scale, we are tackling plastic waste by revolutionizing the beauty and personal care industry through our newly launched brand and its sustainably driven packaging.



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As part of our commitment to drive change in the local community, our regular plastic collection efforts contribute to relieving the weight of the tourist season on local beaches and encourage the community and tourists to keep the beaches clean.

This year, Primal Group launched its personal care brand, **ViTA** debuting in the market with a natural shampoo and conditioner. ViTA's bottles are the world's first and currently only bottles to be made entirely from 100% OceanBound recycled plastic. OceanBound plastic, sourced through our packaging partners Envision Plastics, is defined as plastic found in high-risk coastal areas where there is no formal collection system and plastic waste is most likely to enter and pollute the ocean.

ViTA insists upon non-toxic ink and labels that separate from ViTA packaging so that they enter the recycling stream of mainstream recycling facilities, without the need for rarely available technology, which can lead to recyclable bottles ending up in landfills due to inseparable labels. Our shampoo and conditioner bottles earned the 2018 Sustainable Packaging Coalition's (SPC) *Innovator of the Year Award for Breakthrough Process*.

We are constantly looking for partners who share our philosophy for sustainability and the preservation of the environment through good business. ViTA is playing a lead role in helping its manufacturing partners, Envision Plastics, in their commitment to diverting 10 million pounds of plastic at-risk of polluting Planet Earth's oceans over the next 2 years. Additionally, ViTA is certified toxin-free by the Environmental Working Group and cruelty-free by the Leaping Bunny Program.



ViTA's goal is to create the most advanced and optimal natural products on the market, setting the industry standards for the future.

WILDLIFE

Our bees continue to thrive, and our beehives are now productive. This season we were able to collect 1300kg of honey, and purchased the latest innovation in beehives (Flow Hive Classic Araucaria 7 Frame) which allows us to quite literally obtain honey from bees on tap, with frames that consist of partly formed honeycomb cells.

The bees complete the comb with their wax and then fill the cells with honey. This device is safe for bees as it contains enough space for bees to move between the comb walls when honey is being tapped. Our specialist beekeepers are responsible for taking care of the nearly 40 hives we now have implemented across the plantation. Primal has joined an alliance of 48 honey producers from all across Ceara in order to gather the honey harvested from different farms in the region.

Bees on our farm not only feed and pollinate our crops, they also pollinate native plants during the dry season, helping to promote biodiversity at our farm, and ensuring the best possible yields.

Thanks to our organic practices, bees on our plantations are kept safe from any chemical inputs and are living proof that neem and neem-based products are harmless to pollinators and are essential for the success of our project.



Apart from increasing pollination at our plantation, our bees also demonstrate the viability of neem as a natural pesticide and fertilizer that functions in harmony with beneficial insects.



Our bee hives are designed to allow the workers to collect the honey with minimal negative effects on the insects.

PROTECTED AREAS

Sustainable farming guarantees the protection of wildlife. Primal's practices and methods take into consideration native species that are situated in our plantation. Protected areas are essential to the maintenance of local ecosystems. 20% of all our land has been carefully selected to be left untouched and create the most efficient refuge for local flora and fauna.

We have an area a little over 200 Ha preserved and protected from our own activities as well as from local poaching. Hunting, fishing, and woodcutting are strictly forbidden in this area.

Keeping local vegetation benefits our trees, as well as local pollinators, small reptiles and birds that use the area for feed or cover. We maintain 15-30 meters of native vegetation around all our water sources so that animals can access them through safe passages that go beyond our land into neighboring lands. Recently, we have been awarded 100 native saplings by The Botanical State Park of Ceara, which will be planted around our plantation in order to further promote native species in the area.

To protect wildlife, we have enforced a 40km/h speed limit on our plantation in order to avoid running over small reptiles and birds. Lookouts have been placed across the plantation to issue warnings to drivers and suppliers who exceed this limit.

We were delighted to recently spot a pair of Burrowing Owls, a globally declining species, close to our on-site offices, the same seen last year and now with a new chick! We recently undertook a successful rescue mission for a baby yellow armadillo on our plantation, a threatened breed, and placed him in our legal reserve with the help of our environmental consultants.

Our environmental protection policies are embedded into our philosophy and rule over everything we do. We are working to protect the natural environment at an individual, organizational and governmental level, through our partnerships with the community and its authorities. These practices are benefiting the environment, the local population and our company, as they create awareness of the environmental problems we face and the sustainable practices we execute in order to tackle them. Protecting, sustainable and regenerative measures are at the very core of our daily operations.



Burrowing Owls are endangered in most of the American continent, including Brazil. Our plantation provides a shelter for this unique specie.



Trainings are an integral part of making sure that we transmit our philosophy to our workers, to ensure that they know that what they are doing goes beyond labor, and to encourage them to share our vision with the local community.

COMMUNICATION EFFORTS

We seek to have an active role in distributing information and creating awareness about the environmental, social and political issues that plague our world.

Through our weekly newsletters, social media channels and websites, we make a point of informing investors, prospects and interested readers about the urgent need for change, be it within the agricultural industry, the beauty industry or the packaging industry. In the past years we have distributed information on a variety of subjects advocating disruption in order to save the Planet:

- **Ocean Plastic Pollution**
- **Ocean Dead Zones Caused by Agricultural Run-Off**
- **The Importance of Bees and Pollinators for Global Food Production**
- **The Destruction of the Ozone Layer**
- **The 4th Industrial Revolution and the Future of Agriculture**
- **Climate Change**
- **Legislations that Favor Sustainable Business Practices**
- **Sustainable Agriculture**
- **Neem as Biofuel**



A

Anti-Corruption Principles



10th Principle

Businesses should work against corruption in all its forms, including extortion and bribery.

Primal Group knows that corruption prevents communities from rising out of poverty, hampers competition and the enforcement of sustainable and environmentally sensible policies. This is the reason why we fight corruption in all areas and are committed towards practices that deter corruption in our company and the local communities we engage in.





We have implemented a system that ensures none of our employees or third-party consultants accept to meet with any government official or member of the *Brazilian State Superintendence of the Environment (SEMACE)*, without having received prior written approval from a member of Senior Management. All third-party consultants must always be accompanied by a member of our team when meeting with state, federal or government officials.

Additionally, our suggestion box helps us keep track of complaints and allows for every employee to become a whistle-blower and report inappropriate behaviour such as bribes and unsupervised meetings with government officials or union leaders.

An anti-corruption/ethics clause is established in every contract with our business partners, and we constantly give our employees in-depth insights into common corruption practices and ways to fight them.

At Primal, we truly believe corruption is the enemy of sustainable businesses and of environmental progress in general and will continue to improve our practices in order to do our part to eradicate corruption and its impacts on economic growth.

Our company prides itself on supporting the fundamental corporate Anti-Corruption Principles:

- 1 Operate to the highest standard of ethics and integrity.
- 2 Ensure best governance practices and the creation of an anti-corruption program.
- 3 Be accountable to stakeholders through transparency and public reporting.
- 4 Ensure human resources policies and procedures support the anti-corruption program.
- 5 Design the anti-corruption program based on thorough risk assessment.
- 6 Implement detailed policies and procedures to counter key corruption risks.
- 7 Manage relationships with third parties to ensure they perform accordingly to an anti-corruption standard.
- 8 Use communication and training to embed the anti-corruption program in the company.
- 9 Provide secure and accessible counseling and whistleblowing channels.
- 10 Monitor, assess and continuously improve implementation of the anti-corruption program.



A FINAL WORD

Primal Group is constantly looking to make progress as a sustainable and socially responsible company. In the last year we have made significant advances in our agricultural projects as further proof of our mission to make sustainability the new norm in commercial agriculture.

Through responsible business we have implemented initiatives that have led to ripple effects in the communities we work in. With our education programs we have been able to promote sustainability in the region alongside other business owners. Our employees not only provide labor, but rather a true belief in a sustainable future for our planet. Introducing additional brands that help promote sustainability and environmental responsibility will continue to be part of our mission to create a more sustainable future.

We support other companies that share the principles of sustainability and social responsibility in order to form partnerships and alliances that could further contribute to a greener future and an overall more symbiotic relationship between business and planet.

Utilizing a visionary and futuristic mindset, we are not just ‘playing the game’; we are changing it.

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