

PRIMA  
FLEUR®



# Communication on Progress

Implementing UN Global Compact Principles  
at Prima Fleur Botanicals

## Introduction

- 1 About
- 2 History
- 3 CEO Letter
- 4 Mission and Vision
- 5 Supplier Relationships



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### Human Rights

- 6 Principle 1  
Principle 2
- 7 Harassment Protection  
Equal Employment  
Safety

### Labour

- 8 Principle 3  
Principle 4  
Principle 5  
Principle 6
- 9 Employee  
Training  
Benefits  
Health & Hygiene

### Environment

- 10 Principle 7  
Principle 8  
Principle 9
- 11 Hazardous Waste  
Sustainability
- 12 Certifications and  
Achievements

### Anti-Corruption

- 13 Principle 10
- 14 Media Monitoring  
Recording Devices  
Company Information

---

## Measurement of Outcomes

- 15 Summary of Actions
- 16 Goals  
Commitment Plans



# About Prima Fleur Botanicals



Our company was established on the principles of sustainability of natural resources, lifestyles, and economies which support the continued existence of healthy ecosystems. Every aspect of our business is shaped by our desire to bring awareness of precious botanicals, clean processes, and earnest human endeavor involved with the natural product movement.

In 2008, we chose to become certified by ECOCERT® which was primarily a statement of our dedication to truth and transparency since many of the essential oils and other materials we use are certified by ECOCERT. By doing this, we are supporting the effort made by this and other organizations to guide industries in the use of clean processes and delivery of safe products.

We are lifetime members of the Aromatic Plant Project founded by Jeanne Rose. It is an educational organization which supports American agriculture in all aspects of farming and processing of aromatic plants especially for use in the personal care industry. We have supported domestic farmers and distillers for many years, purchasing hydrosols distilled from their crops, developing markets for their products, purchasing hydrosols distilled from their crops, developing markets for their products, and educating consumers. For nearly 20 years Prima Fleur has supported sustainability globally in the following ways:

One of Prima Fleur's first business associations was with a distiller from Madagascar. Our guaranteed sales of essential oils and extracts gave their company and the farmers who supplied them the necessary security and financial support to help maintain their agrarian lifestyle.

For almost 20 years, an annual guaranteed purchase of shea butter from a particular coop in Uganda has contributed to the majority of support of an entire village. A supplier in Morocco gathers wild rosemary, *tanacetum annuum*, and other herbs for distillation giving local economies a boost while guaranteeing the survival of the wild plants.

For our loyal support of smaller companies, family-owned farms and people whose lives are tied closely with the land, we are rewarded with precious raw materials produced with integrity and the knowledge of generations.



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# Our History

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Founded in 1990, Prima Fleur Botanicals is dedicated to the reinforcement of man's miraculous relationship with nature.

Product development begins with the treasured relationships we have with our suppliers. Throughout this process, we are guided by our customers' desires, our years of experience and an intimate relationship with nature. An extensive knowledge of the most recent research and technological advancements in the cosmetic industry enables us to provide a full menu of the most sought-after ingredients.

We search the planet to procure the purest and most potent botanicals, and our careful selection of raw materials is based on the use of expeller-expressed vegetable oils, organic herbs, waxes, and butters obtained without petrochemical solvents. The elements of scent are fundamental to every aspect of our lives; psychological, physiological, and spiritual. Of the hundreds of extraordinary materials we procure, essential oils are the most valued.

Flora and fauna exist in an interlocking relationship reinforced through millions of years of evolution. Our bodies take in the soft, calming breath of lavender and the fortifying guardian rosemary with ease and pleasure.

As we discover new and effective ingredients, we continue to formulate and add to our extensive Premier Personal Care line, essential oils and blends. We offer over 250 therapeutic- quality essential oils for aromatherapy blending ~ as well as an exquisite collection of the most precious absolutes for use in personal care products, and for creating perfumes and scenting our luxurious body care products. Our premier personal care products are proudly used in many of the world's leading spas as amenities, treatment products and retail.

In all we do, we strive to keep a balance between our way of living and our environment. It is in this balance that we find health, joy, and serenity.



4/29/2022

***To our stakeholders:***

I am pleased to confirm that Prima Fleur Botanicals, Inc. reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

With this communication, we express our intent to implement those principles. We are committed to making the UN Global Compact and its principles part of the strategy, culture, and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development goals. Prima Fleur Botanicals, Inc. will make a clear statement of this commitment to our stakeholders and the general public.

We recognize that a key requirement for participation in the UN Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the Ten Principles. We support public accountability and transparency, and therefore commit to report on progress within one year of joining the UN Global Compact, and annually thereafter according to the UN Global Compact Policy. This Includes:

- A statement signed by the chief executive expressing continued support for the UN Global Compact and renewing our ongoing commitment to the initiative and its principles. This is separate from our initial letter of commitment to join the UN Global Compact.

- A description of practical actions (i.e., disclosure of any relevant policies, procedures, activities) that the company has taken (or plans to undertake) to implement the UN Global Compact principles in each of the four areas (human rights, labor, environment, anti-corruption).
- A measurement of outcomes (i.e., the degree to which targets/performance indicators were met, or other qualitative or quantitative measurements of results).

Sincerely  
yours,

***Marianne Griffeth***  
***President, Owner, and Lead Chemist***

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## Our Mission

Our mission is to manufacture and deliver the highest quality custom personal care product design, using the most innovative and effective methods, and the most natural, luxurious ingredients available.

We are committed to serving the global community through environmental advocacy and responsible manufacturing, using only certified organic ingredients and formulations.

## Our Vision

We are committed to the belief that mankind must not lose the precious little that is left of the wild and natural. We strive to bring conscious awareness to the force that nature has in our lives, and we are inspired by the Latin phrase, *Esse Quam Videri*, which means “to be, rather than to seem.”

Formulating with essential oils allows us to capture the very means by which nature communicates her sincerest sentiments. Our reputation for innovation and perfection speaks to the uncompromised quality we demand of ourselves and our suppliers, and which ultimately has the potential to impact the essential human experience.

It is our vision that, through the manufacture and delivery of our products, we are able to stimulate and reinforce the human relationship with nature, if only by way of a primordial stirring caused by a drifting, elusive scent.



Malawi, Africa



Jakarta, Indonesia

*“What a wondrous thing it is  
to bottle the exhalation of a flower.”*

*~Marianne Griffeth*



# Supplier Relationships

Behind the story of each essential oil is a story of social responsibility that is so critical to the land and its people. Prima Fleur Botanicals is fortunate to have established a deep connection with our suppliers from around the globe. We are blessed to work with and support them, and tell the stories of their remarkable history through the scent of their essential oils.

## Madagascar

We purchase fourteen different essential oils including ylang ylang and one of our bourbon geranium essential oils from Madagascar, an island continent off the south eastern coast of Africa. We have worked with the same family- owned Malagasy business for over two decades. We purchased the entire production of their very first distillation of geranium about 18 years ago, and have bought it every year since. We've been through some very tough times with political revolutions, hurricanes, and civil wars. We hosted the ambassador from Madagascar when he visited northern California. He later went on to become the Prime Minister.



## Kenya

Considered an international expert in the Fair Trade movement Philip Leakey, in 2008, was an honored guest speaker at the World Export Development Forum hosted by ITC (adjunct to the United Nations) in Montreux, Switzerland. Mr. Leakey, a botanical expert and lifelong innovator in the development of sustainable natural resources for small and large scale business and community development spoke to the international delegation of experts in Fair Trade on the identification of sustainable raw materials, ecological processes, and applications for building communities through economic empowerment.

The Leakey's won the environment conscious award in Kenya, 2002 and continued to set the precedent for their innovation of nomadic work sights rather than building factors to preserve the environmental and cultural integrity of the areas in which they work.



## Nepal

In their words: "We believe that in a country like Nepal, sustainable development is only possible through empowerment of people living in the rural areas. We encourage remote farmers for sustainable farming of medicinal and aromatic plants, which have high export potential. We are dedicated to developing a market for such medicinal herbs and establishing parameters for supply and demand economics appropriate for this region of the world. Our mission is to harness economic power in the rural community of Nepal by creating a responsible, socially just and environmentally-sustainable society."



# Human Rights

A photograph of a fresh aloe vera plant with several long, green leaves. Surrounding the plant are various skincare products: a white bowl containing a pinkish-white cream, a yellow jar with its lid off, a clear jar of white cream, a glass jar of dark brown powder, and a clear bottle of yellow liquid. The items are arranged on a light-colored, textured surface.

Prima Fleur Botanicals, Inc. supports fundamental corporate governance principles:

## Principle #1

Make sure that they are not complicit in human rights abuses

## Principle #2

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



The UN Universal Declaration of Human Rights

The Universal Declaration of Human Rights (UDHR) is a milestone document in the history of human rights. Drafted by representatives with different legal and cultural backgrounds from all regions of the world, the Declaration was proclaimed by the United Nations General Assembly in Paris on December 10, 1948, as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected.

UN Guiding Principles on Business and Human Rights

The Guiding Principles for Business and Human Rights Protect, Respect and Remedy Framework, are the Guiding Principles seeking to provide an authoritative global standard for preventing and addressing the risk of adverse human rights impacts linked to business activity.

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# Harassment Protection

Sexual harassment or harassment of any nature is considered a major violation of Prima Fleur Botanicals' policy, and will be dealt with accordingly in terms of suspension, termination or corrective counseling. Prima Fleur Botanicals maintains a Zero Tolerance Policy for sexual or physical harassment and discrimination based on gender, race, or sexual orientation.

## Anti-Harassment Procedures:

- ◆ Prima Fleur Botanicals will establish, publicize, and enforce antiharassment policies and complaint procedures.
- ◆ Prima Fleur Botanicals will provide every employee with a copy of the policy and complaint procedure, and redistribute it periodically.
- ◆ The policy and complaint procedure should be written in a way that will be understood by all employees in Prima Fleur Botanicals' workforce.
- ◆ Other measures to ensure effective dissemination of the policy and complaint procedure include posting them in central locations and incorporating them into employee handbooks.



# Equal Employment



Our company is committed to equal employment opportunity. We will not discriminate against employees or applicants for employment on any basis including, but not limited to: veteran status, uniform servicemember status, race, color, religion, sex, national origin, age, physical or mental disability, genetic information or any other protected class under federal, state, or local law.

Prima Fleur Botanicals is committed to diversity and inclusion in everything we do. Our company welcomes the world with open arms and will never turn anyone away due to their race, gender, or ethnicity. We have created an environment where every employee feels wanted, needed, and heard.

Prima Fleur is devoted to inclusivity, and we are constantly looking for more ways we can improve. In 2022, we are implementing goal number 5 and goal number 10. We believe that our company has the ability to reduce inequalities and gender discrimination in the workplace, and we are determined to set an example in the beauty industry.

## Safety

The Personal Protective Equipment procedure has been put in place to define the safety requirement of wearing eye and hand protection for employees and visitors to prevent injury when entering and working in specified areas of the Prima Fleur Botanicals plant. Eye protection includes safety glasses, chemical workers' goggles, and splash shields which are issued or approved by Prima Fleur Botanicals for employees' protection.

It is the purpose of Prima Fleur Botanicals to create a safe work environment for all employees through preventative planning and close monitoring of all potential safety hazards. This will be achieved through close and consistent communication between all departments as well as swift action to correct potentially dangerous events.

New Training Sessions Put in Place:

- ◆ Fire Extinguisher
- ◆ Fire/Earthquake Drills
- ◆ Eye Wash Stations
- ◆ CPR



# Labour

Prima Fleur Botanicals, Inc. supports fundamental corporate governance principles:

## Principle #3

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

## Principle #4

the elimination of all forms of forced and compulsory labour;

## Principle #5

The effective abolition of child labour; and

## Principle #6

the elimination of discrimination in respect of employment and occupation



International Labour Organization (ILO)  
Fundamental Conventions

The ILO Governing Body has identified eight fundamental Conventions, covering subjects that are considered to be fundamental principles and rights at work: freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation. These principles are also covered by the ILO Declaration of Fundamental Principles and Rights at Work (1998).



Ethical Trade Initiative (ETI) Base Code

The ETI Base Code is founded on the conventions of the International Labour Organization (ILO) and is an intentionally recognized code of labor practice.

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## New Employee Training

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Prima Fleur Botanicals has implemented a strict training program to ensure the success of all employees. The training program provides new employees with the skills, techniques, and methodologies to prepare them in performing their assigned job in a regulatory compliant, safe, and quality manner.

Training is conducted and documented through the following:

- ◆ Read and Understand – Employees read assigned documents and confirm their understanding of the policy, procedure, regulation, manual, etc.
- ◆ Training Discussion – The trainee reads assigned documents and discusses content with the trainer to make certain that the material is understood.
- ◆ Training Presentation – A trainer demonstrates a skill or procedure. Examples of presentations may include training on policies, techniques, procedures, equipment, methods, etc.

## Employee Benefits

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Our company has developed a comprehensive set of employee benefit programs to supplement our employees' regular wages. Our benefits represent a hidden value of additional income to our employees.

Some benefits include:

- ◆ Full-time and part-time regular employees eligible for paid holidays immediately upon hire.
- ◆ Part-time regular employees eligible for holiday pay in proportion to the number of hours they normally are scheduled to work.
- ◆ All full-time regular employees are eligible for vacation. All part-time, regular employees will accrue vacation on a pro rata basis based on the number of hours worked.
- ◆ Our company provides eligible employees with a 401(k) Qualified Retirement plan which is an excellent means of long-term savings for your retirement. Employees may receive bonuses from time to time. These are based on individual merit, the company's profitability and any other factor(s) deemed significant by the company.



## Health & Hygiene



Prima Fleur Botanicals follows a set procedure to ensure the health, hygiene, and safety of all employees. This includes:

### Clothing:

All employees must begin their shift wearing clean garments. Production employees must wear hair covers and change or clean/sanitize (or replace) outer garments when they become soiled.

Employees must wear hair covers and single-use disposable gloves and maintain the cleanliness of all outer garments.

### Grooming:

All staff in manufacturing and production areas must ensure hair is clean and kept under hair net at all times. Any other types of wraps that restrain the hair must be approved.

Hair control must be in place prior to entering work areas, and must not be removed until outside work areas.

### Health:

All employees, including temporary employees, are responsible to notify their supervisor of any relevant infectious diseases or conditions with which they may be with that might lead to the product becoming contaminated.

# Environment

## Principle #7

Businesses should support a precautionary approach to environmental challenges;

## Principle #8

Undertake initiatives to promote greater environmental responsibility; and

## Principle #9

Encourage the development and diffusion of environmentally friendly technologies.

If our business prioritizes the planet's health, we can make a difference. In that effort, Prima Fleur has dedicated every step to a strict review of our supply chain, our manufacturing processes, our waste management, our workforce, and our corporate social responsibility to give back.

We have set accelerated timelines in waste management, eliminating our use of plastic while encouraging and educating our clients on how they may do the same.

As a natural and organic personal care creation leader, we support and participate in the certification agencies that regulate the standards for clean processes, total transparency, and traceable documentation for reporting. We conduct on-site visits with many of our vendors to ensure they are working in the same spirit by taking care of the land, not over-harvesting, supporting their workforce with fair labor standards protecting the rights of women and children.



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## Hazardous Waste

The Hazardous Chemical Waste Disposal Program at Prima Fleur Botanicals operates in accordance with the Resource Conservation and Recovery Act (RCRA) and the 1984 Hazardous and Solid Waste Amendments to RCRA. Hazardous chemical wastes generated at Prima Fleur are collected and packed by a licensed hazardous waste contractor. The waste is collected from labs, shops, or other work areas and is transported to the predesignated hazardous waste storage areas. The waste is segregated and stored in the storage areas until it is packed for shipment and transported to a final permitted recycling, treatment, or disposal facility.

Prima Fleur personnel who handle hazardous waste will receive training in specific aspects of hazardous waste management procedures. The Safety and Health Manager provides this training. Individuals who have met this training requirement will request disposal of their hazardous chemical waste by completing the appropriate Hazardous Chemical Waste Disposal Label" and attaching it to the container of waste. The information contained on the label includes:

- ◆ Date form completed
- ◆ Source (name, location, organization, phone number)
- ◆ Constituents
- ◆ Container size and approximate amount disposed



## Sustainability

By employing the use of natural preservative and emulsifying systems (COSMOS Approved, Non- GMO, RSPO, MB) selected from the most forward- thinking, environmentally-sound companies, we guarantee that even the most structural parts of our products will be sustainable. We are proud to describe each ingredient in our products. Full transparency is a relatively new concept that is often sought but rarely delivered in most industries. To us, transparency is not a choice; it is a mandate.

Often the first cosmetic manufacturers to use botanical ingredients found in remote areas of the world, we steer our formulations to support commerce that preserves traditional cultures and ensures the continuing availability of resources.

Practicing fair trade principles while we collaborate with our global suppliers to create sustainable business relationships, we help protect natural resources and support healthy communities around the world.

At Prima Fleur, we are committed to the belief that we must not lose the precious little that is left of the wild, the primeval, the natural. We hope that, through the products we create and the relationships we build, we engender a lifestyle that embraces and practices the ways we may lovingly conserve our planet's primordial wilderness, those places we often call, "Out in Nature."



## Certifications and Achievements

Having always complied with Good Manufacturing Practice as verified by Ecocert Greenlife, a worldwide certifier of organics, we are registered with the FDA and the State of California Department of Public Health for Cosmetic Manufacturing. We hold memberships with the Independent Cosmetic Manufacturers & Distributors (ICMAD) and the International Spa Association (iSPA), and are Silver Star Guiding Sponsors of the Green Spa Network (GSN).



EcoCert Greenlife, A third-party European organization that certifies more than 70% of the organic producers in France, Ecocert Greenlife was the very first certification body to develop standards for natural and organic cosmetics. Recognizing the need for standards in the development of natural skincare, Ecocert defined a requirement level for manufacturers who make products with respect to the natural substances and the environment. The organization currently certifies in over 80 countries providing two certifications: ECOCERT Natural and ECOCERT Natural and Organic.

Oregon Tilth Certified Organic (OTCO) is an internationally recognized symbol of organic integrity. It has been offering organic certification services to producers, manufacturers, food handlers and more, both nationally and internationally, for over 30 years.

Helping to develop the National Organic Standards of the USDA, Oregon Tilth was one of the first to gain accreditation and begin offering organic certification under the USDA organic regulations.

OTCO provides a system that combines strict production standards, on-site inspections, and legally binding contracts to protect the producers and buyers of organic products. With their support, we offer to our clients' products certified under USDA National Organic Program (NOP) and the National Science Foundation (NSF).



# Anti-Corruption

## Principle #10

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

Prima Fleur Botanicals, Inc. adheres to the highest legal and ethical standards applicable in our business. The company's business is conducted in strict observance of both the letter and spirit of all applicable laws and the integrity of each employee is of utmost importance.



## Media Monitoring

Due to recent evolution of electronic media communications, it is necessary to establish additional operational guidelines for Prima Fleur employees in order to take advantage of new opportunities for communication while protecting confidentiality, adhering to previously established protocol, and providing adequate oversight.

These guidelines include but are not limited to:

- All communications are to be conducted in compliance with the legally-binding confidentiality agreements which Prima Fleur has either by written or implied contract with our clients.
- Prima Fleur clients, prospects and client lists are included as Prima Fleur's trade secret property. It is against company policy for Prima Fleur employees to contact Prima Fleur clients for personal reasons or to accept favors without the consent of the owners.
- All voicemail passwords must be made available to the company at all times.

Violations of these policies are not permitted and may result in disciplinary action, up to and including discharge.

## Recording Devices

Cameras, digital recorders, tape recorders, and all other forms of recording devices are prohibited in all "Restricted Areas." Employees are prohibited from having any form of recording device in their possession in a Restricted Area. Violations of this policy may result in discipline (including the possibility of discharge), immediate removal of the recording device and/or the employee from the Restricted Area, and retention of the recording device for inspection by the company and/or legal authorities. The "Restricted Areas" are bathrooms, dressing rooms, examination rooms and all other areas where signs have been posted indicating that the area is considered a Restricted Area.

Limited exceptions will apply when the employee in possession of the recording device has been provided advance written authorization to use the recording device by an authorized member of company management and the recording device is being used in an authorized manner to further company business.

## Company Information

Protecting our company's information is the responsibility of every employee, and we all share a common interest in making sure it is not improperly or accidentally disclosed. Employees are prohibited to discuss the company's confidential business with anyone who does not work for us, and are required to sign a Confidentiality Agreement as a condition of employment, in accordance with state and federal law.

All employees must abide by the following:

- Due to the uniqueness of our business, any confidential information regarding product, formulas or related materials are not to leave the premises or be disclosed to others.
- All telephone calls regarding a current or former employee's position/compensation with our company must be forwarded to one of the owners.
- The company's address shall not be used for the receipt of personal mail.



# Summary of Actions

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## Human Rights

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Prima Fleur Botanicals ensures the health and safety of employees by providing the proper training to prevent discrimination and harassment in the workplace. This includes mandatory training sessions for sexual harassment, fire & earthquake safety, and CPR. Prima Fleur Botanicals promotes inclusivity and takes measures to ensure that all employees, regardless of race, gender, or ethnicity, are provided with equal pay, hours, and Health Care. Developing deep relationships with our suppliers is a top priority at Prima Fleur. We are proud of the connections we have made all over the globe, and we will continue to offer them our support in every way possible.

## Labour

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Prima Fleur Botanicals proudly provides all employees with fair wages and working hours. All health, safety, employee documents, and procedures are translated in major languages to provide equal communication and protection for all employees. Prima Fleur Botanicals is in compliance with California minimum wage standards, and does not participate in any type of forced, bonded, or child labor. All necessary steps are taken to provide employees with paid time off, sick leave, and workers compensation. Injuries that occur within the workplace are covered by Prima Fleur Botanicals, and the safety of employees is of the utmost importance.

## Environment

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Prima Fleur Botanicals applies strict policies to ensure that environmental health and safety are a top priority. Employees receive hazardous waste and substance training. Procedures are in place in the event of an accident that may harm the environment or human health. All employees must wear protective gear while working within manufacturing, including lab coats, hair nets, and shoe coverings. Prima Fleur Botanicals strives to minimize environmental damage by regulating water usage, recycling waste, and reusing materials when applicable. In addition, Prima Fleur provides Safety Data Sheets with some products to ensure the safety of customers, employees, and the environment.

## Anti-Corruption

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Prima Fleur Botanicals applies several anti-corruption measures to ensure the protection of the company and employees. Awareness training is in place for all employees to prevent information and security breaches. This includes frequent data protection, physical office security, and mobile security training sessions. Prima Fleur Botanicals implements audits of control procedures to prevent corruption and bribery, and specific approval for sensitive transactions is mandatory. All employees are required to sign a non-disclosure agreement that protects third party data from unauthorized access.

# Goals

Prima Fleur Botanicals is determined to provide authentic and sustainable products without sacrificing the welfare of the environment, employees, and clients. Our main goal is to inspire a connection to nature through ethically sourced, luxurious products.

In 2022, we will be making improvements to our policies in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

## Human Rights

We are committed to providing a healthy, safe, non-discriminatory work environment for all employees. In 2022, we want to inspire our community to take action against all forms of discrimination. We also plan to further support our suppliers with the necessary tools and materials they need for production and economic stability.

## Labour

Protecting the environment has always been Prima Fleur's top priority. We want to make it our goal to give back to our community through beach clean ups, internal policies to ban plastic water bottles, and replace plastic components with eco- friendly alternatives.

## Environment

At Prima Fleur, we want to make mental health awareness a top priority. We will be implementing new policies that will allow our employees time off for mental health purposes. We are also working towards granting time off for employees wishing to attend environmental seminars, enroll in classes, or participate in community affairs.

## Anti-Corruption

To further improve the protection of the company and our employees, we will require all employees to re-sign the company Non-Disclosure Agreement annually. We will also limit access to company material post working hours and Increase amount of "Restricted Areas" to further prevent company information from being recorded.

## Our Commitment Plans



Caring for Climate  
Anti-Corruption Call to Action  
CEO Water Mandate  
Women's Empowerment Principles



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