

General Business Principles

for conducting business with Natural



General Business Principles

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Control Sheet

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** For any updates, improvement suggestions or broken links, please contact Natural.

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1 General Business Principles

At Natural, we blend environmental and social consulting with strategic insight to shape a planet-positive future. Our General Business Principles (GBP) outline our commitment to our people, clients, partners, society, and governments.

Our GBP ensures compliance with local laws and cultures, guides our global operations, and sets expectations for our team and partners. We believe shared core values drive our mission and enhance ESG efforts.

Ethics, honesty, integrity, and hard work are the cornerstones of our GBP. These values foster a culture of integrity and compliance, promoting sustainability. We uphold the highest professional and ethical standards, building trust through openness and responsibility. Our dedication to superb E&S services and lasting, respectful client relationships is unwavering.

1.1 Governance

Everyone at Natural understands and adheres to our General Business Principles (GBP). We recognize that our people and management have the ultimate responsibility for implementing and upholding these principles.

1.2 Dealing with Dilemmas

The General Business Principles (GBP) and related policies can't cover every possible situation. Therefore, it's crucial to use sound judgment when facing specific dilemmas. Natural encourages open discussions about integrity issues among collaborators and with management, fostering a safe speak-up culture.

1.3 Value for Customers

We are a trusted partner, committed to delivering services that protect stakeholder interests. Our terms ensure independent professional judgment and value creation for clients. We maintain transparency about any potential conflicts of interest during service execution.

1.4 Responsible Employment Practices

At Natural, our success is built on our people. We respect human and labour rights, ensuring a safe, healthy, and supportive work environment. We promote engagement and personal development through comprehensive policies and initiatives, offering equal opportunities for recognition, advancement, career development, and compensation, regardless of background or beliefs.

Discrimination is not tolerated. Our [Human Rights and Labour Policy](#) apply to recruitment, supply chains, and procurement, setting clear expectations for our operations and client projects.

1.5 Grievances

Natural is committed to investigating and addressing stakeholder concerns and taking appropriate corrective actions for violations. We ensure that reported concerns, whether about a third party or in confidence, are handled without repercussions or retaliation for good faith reports.

Stakeholders can report concerns via email at compliance@natural-consulting.ca. For details on how we process personal data or to contact our Privacy Office, please refer to Section 3.2.

2 Conducting Business

2.1 Anti-Bribery and Corruption

At Natural, we uphold the highest standards of integrity and honesty. Bribery, corruption, and kickbacks are strictly prohibited and illegal. This includes money, gifts, hospitality, expenses, reciprocal favours, facilitation payments, and sponsorship agreements. Even agreeing to bribery, without any exchange, is a criminal offence. This policy applies to all our personnel, agents, consultants, business partners, suppliers, and subcontractors worldwide. Everyone at Natural is responsible for understanding and adhering to our business integrity practices described in this section, recognizing signs of corruption, and speaking up against it.

2.2 Gifts and Hospitality

When giving or receiving gifts, meals, or hospitality, especially during key business decisions, caution is essential to avoid any appearance of bribery or undue influence. Natural personnel may exchange modest and infrequent gifts or hospitality, with local approval, but never in expectation of something in return or in a way that compromises fair decision-making. Extra care is needed with public officials due to stricter regulations. Similarly, when involving family or close friends, always seek local management approval. Gifts and hospitality must serve a genuine business purpose.

2.3 Anti-Money Laundering

Anti-money laundering (AML) laws and regulations prevent the concealment of illegally obtained funds, making them appear legitimate. At Natural, we comply with all AML and counterterrorism financing laws, accepting funds only from legitimate sources and ensuring they are not used in violation of anti-bribery, anti-corruption, and AML laws. We conduct business exclusively with reputable third parties, including clients, suppliers, and partners who operate legitimately. Stay vigilant for suspicious activities that may indicate money laundering, such as:

- Third-party arrangements lacking a clear business rationale.
- Involvement of third parties without appropriate experience or clear ownership.
- Payments from unrelated countries or tax havens.
- Attempts to make payments in cash or cash equivalents.
- Payments by third parties not involved in the contract or from unusual accounts.

2.4 Conflicts of Interest

A conflict of interest occurs when personal or financial interests, activities, or relationships interfere with your ability to make decisions in the best interests of Natural or our clients. To identify a potential conflict of interest, ask yourself: (i) Do I or my close family stand to benefit from this situation? (ii) Could this activity interfere with my job performance? (iii) Am I putting my interests ahead of Natural's? When in doubt, consult Natural's Management for guidance.

2.5 Sanctions and Trade Compliance

Trade laws are complex, but at Natural, we comply with all regulations governing the import, export, and trading of goods, technology, and software. Sanctions restrict us from doing business with certain countries, organizations, or individuals to protect Canadian security and foreign policy interests.

Trade compliance, or export controls, are government-imposed restrictions on exporting sensitive materials. These controls apply to the transfer of goods, equipment, technology, and software, and depend on the end-use or end-user. Breaching sanctions or export controls can lead to severe consequences, including prosecution, fines, imprisonment, debarment, and public exposure. To navigate this, Natural adheres to Canada's current sanctions list.

2.6 Fair Competition

Competition laws, or antitrust laws, protect clients, businesses, and consumers by promoting free and fair competition. At Natural, we support free enterprise and adhere to all competition laws and regulations. We expect our personnel to help combat anti-competitive practices, including: (i) Anti-competitive agreements like price fixing, market sharing, output restrictions, bid rigging, and collusive tendering, (ii) exchanging commercially sensitive information with competitors, directly or indirectly, (iii) abusing market power, and (iv) failing to notify competition authorities about required transactions.

2.7 Engaging with Third Parties

At Natural, we uphold the highest standards of business conduct and integrate sustainability into everything we do, including our supply chain. We collaborate with third parties who share our values and integrity, expecting them to adhere to our General Business Principles (GBP) or equivalent standards, and our Global Supplier Code of Conduct.

We value innovation and sustainability in our partnerships with clients, suppliers, and business partners. Our due diligence process includes communicating expectations, monitoring performance, and addressing issues, even withdrawing from contracts if necessary. We work ethically and sustainably with our suppliers, ensuring fair treatment and timely payments. Our commitment extends to the ten United Nations Global Compact (UNGC) principles on human rights, labour standards, environmental stewardship, and anti-corruption.

2.8 Political Activities, Lobbying and Donations

Natural and its personnel will not offer or promise anything of value to anyone, including public officials, political parties, or employees of clients and suppliers, to gain business or improper advantages. Lobbying involves communicating with public officials or organizations to influence decisions on policies.

Consult Natural's Management before engaging in any lobbying activities. Natural has a strong tradition of charitable partnerships. To ensure transparency and accountability, all charitable donations require prior approval from local management.

2.9 Protecting the Environment

Natural is dedicated to leading in sustainable business practices, aiming to protect the planet and promote a sustainable future. We maximize our positive impact on society, the environment, and biodiversity through client projects, our operations, and community engagement. We adhere to global standards for sustainable business conduct, striving for a circular, sustainable, and equitable economy.

Our efforts are guided by the UN Global Compact, the UN Sustainable Development Goals, and the Science Based Targets Network. Our **Environmental** and **Biodiversity** policies align our business processes to improve environmental performance, increase energy efficiency, and reduce costs. Our team is trained to help achieve our environmental targets and maintain local environmental management systems.

2.10 Social Value

At Natural, we believe corporate policies should enhance our clients' competitiveness while advancing social, environmental, and economic prosperity at the community level. Our social value at the community level includes:

- Leaving a positive economic legacy locally.
- Promoting environmental and social justice through thoughtful service design and delivery.
- Engaging in local sustainability efforts, such as capacity building on environmental and social issues.
- Fostering a people-focused approach, supporting our team to excel and contribute to their communities.
- Contributing to the UN Sustainable Development Goals.

3 Protecting Assets and Data

3.1 Information Security

Natural is dedicated to safeguarding our information and assets against loss, misuse, unauthorized access, and damage. Our [Information Security](#) policy addresses internal and external threats and supports this commitment. We ensure our safeguards are current across physical workplaces, digital workplaces, business processes, and human behaviour. This is also supported by our [Use of Artificial Intelligence policy](#).

3.2 Privacy and Personal Data Protection

Natural has established six privacy rules to protect personal data for our people, clients, suppliers, and partners. These rules align with Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and include:

1. Lawfulness, fairness, and transparency
2. Purpose limitation
3. Data minimization and accuracy
4. Storage limitation
5. Security and confidentiality
6. Accountability

These principles ensure we handle personal information responsibly and in compliance with relevant privacy laws.

3.3 Accurate Records and Business Controls

Natural ensures accurate and compliant documentation of financial, project, and business records, reflecting all assets, liabilities, and transactions. Our financial reporting adheres to Canada's Generally Accepted Accounting Principles (GAAP), ensuring accuracy, completeness, and timeliness. Our processes provide reasonable assurance for reliable financial statements. Ethical behaviour from our personnel supports adequate resources and governance across all business operations, including financial controls on projects.

3.4 Social Media and Media Communications

Social media offers great opportunities for Natural to build relationships with clients. However, employees and collaborators must use it to enhance our image and reputation, avoiding posts that could lead to complaints, claims, fines, or reputational damage. Key guidelines include:

- Align your social media use with our core values and behaviours.
- Avoid using your Natural email for personal social media accounts.
- Only speak with the media if you are an approved Natural spokesperson.

Remember, there are also security, competition law, and data protection considerations to keep in mind.

3.5 Inside Information and Insider Trading

Natural adheres to national and international insider trading laws. If you have inside information about a Natural client listed on a stock exchange, you must not share it unless necessary for your work. It is also illegal to trade or encourage trading in that company's shares. Inside information includes financial results, large acquisitions, senior management changes, market entry plans, or significant litigation developments. Breaching insider trading rules can lead to administrative and criminal penalties, including fines and imprisonment.

4 Working Together

4.1 Human Rights and Labour

Natural is dedicated to treating everyone with dignity and respect. Recognizing society's growing expectation for businesses to uphold human rights, we align with the UN Guiding Principles on Business and Human Rights (UNGPs). Our **Human Rights and Labour** policy reflects our commitment to these principles, as well as the International Bill of Human Rights and the International Labour Organization's (ILO) core conventions, including those on forced labour. We believe in our responsibility to respect all human rights, avoid negative impacts, and enhance positive contributions. We expect the same from our employees, contractors, clients, suppliers, and business partners. To uphold this commitment, we implement a human rights due diligence process to prevent, mitigate, and address any negative impacts linked to our business activities. We also expect our partners to share this commitment.

4.2 Diversity, Equity, Inclusion and Belonging

At Natural, we are committed to fostering diverse and inclusive environments. Our human-centric approach ensures everyone is treated with dignity and respect. We aim for every team member to feel they belong and can thrive, valuing and celebrating differences as assets. We create diverse workplaces and equal opportunities to deliver outstanding client experiences and meet varied needs. Our culture of diversity, equity, inclusion, and belonging ensures employees from all backgrounds feel welcome, safe, and recognized, allowing them to use their talents for personal and client success. Building an inclusive workplace that reflects our communities is a priority. This foundation of diversity helps us challenge inequity and attract, retain, and develop top talent.

4.3 Harassment, Bullying and Discrimination

At Natural, we uphold the principle of equal treatment for all employees, as defined by the International Labour Organization (ILO) conventions. This is key to our journey towards achieving our goals of Dignity, Respect, and Anti-Discrimination. Our aim is for every team member to feel they belong and can thrive in an environment where differences are valued and celebrated. We do not tolerate discrimination, harassment, victimization, or any form of unfair treatment.

We are committed to creating diverse and inclusive environments free from discrimination based on visible and non-visible diversities, including race, national origin or ethnicity, gender identity, sexual orientation, marital status, age, social class, physical or mental ability, attributes, experiences, strengths, skills, perspectives, work styles, religious or ethical values system, citizenship status, veteran status, and political beliefs. Our goal is to ensure our services and solutions promote diversity, equity, inclusion, and belonging.

4.4 Workplace Health and Safety

At Natural, we aim for zero incidents, prioritizing the health, safety, and well-being of our team and stakeholders. We follow the International Finance Corporation's (IFC) Performance Standard #2 on Labour and Working Conditions, setting minimum health and safety requirements. Local organizations can adopt stricter measures based on their specific needs. Everyone at Natural has the authority to stop work if they believe health and safety risks are not properly managed. Management fully supports the use of this Stop Work Authority in good faith.

4.5 Drugs and Alcohol-Free Workplace

Substance abuse impairs judgment, increasing safety risks and poor decision-making. Natural ensures a safe, productive work environment by setting standards for drug and alcohol use. While respecting personal choices, we act if these choices affect work or safety. Being unfit for work due to substance use can lead to disciplinary actions. Limited use of light alcoholic beverages may be allowed for certain events with local leadership approval. Employees should check their local handbook for guidance. We encourage anyone struggling with substance abuse to seek help at any time.

5 Speaking Up

5.1 Your Responsibilities

The GBP are mandatory and must always be followed. Use them to understand your role's responsibilities, especially when changing roles, as new risks may arise. Your commitment to integrity and compliance is crucial for the safety and success of both you and Natural. Our collective behaviour shapes our company's integrity and compliance culture, supporting a sustainable future. Every employee is responsible for this, with management also ensuring a safe environment for raising concerns or complaints.

5.2 You Suspect a Violation

If you suspect a violation of Natural's core values, the GBP, or other policies and regulations, you are empowered to seek advice and speak up. Always seek guidance from Natural's management and remember your duty to report any violations. Reporting concerns helps Natural detect and address potential issues early.

5.3 No Retaliation

Natural encourages you to report any suspected misconduct, fraud, or irregularities in good faith. You can trust that raising concerns will not lead to negative consequences, and you will be protected against retaliation. Compliance with the GBP and the law will not result in any business loss being held against you.

5.4 Consequences of Violating the GBP

Violating the GBP or legislation can lead to disciplinary actions, including warnings, suspension, pay reduction, or termination, depending on the severity of the issue. Such violations can also cause severe consequences for Natural, like reputational damage, client issues, a drop in share price, and criminal or administrative sanctions.

5.5 Integrity Line for External Stakeholders

Natural has a reporting procedure available for its external stakeholders (suppliers, clients and other third parties) to report any concerns they may have that the GBP and/or related policies are being breached.

Natural will investigate, address and respond to the concerns of our stakeholders and will take appropriate corrective action in response to any violation. Natural recognizes that reported concerns may be about a third party or be in confidence, and Natural assures it will be handled as such, without repercussions or retaliation for reports made in good faith. To report a concern, our stakeholders can send an email to compliance@natural-consulting.ca.



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