

CORPORACIÓN HABANOS, S.A.

CODE OF CONDUCT

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Code of Conduct Administration

Dear colleagues:

The Code of Conduct of Corporación Habanos, S.A. sets out the standards of responsible behaviors of the Company and we hope that all our employees will follow each one of the aspects of this Code.

It is important for us to ensure that all our activities are conducted with the utmost integrity.

Our Code of Conduct is an essential tool to ensure the long-term sustainability. Your personal and collective commitment to the standards set out in our Code is crucial to fulfill our sustainable sales growth target.

It is incumbent on us all to read the Code thoroughly to ensure we clearly understand what is expected of us, and adhere to the behaviors outlined in all our daily activities.

Our continued success depends on high standards of conduct and behavior, underpinning our reputation and enabling us to deliver sustainable sales growth.

Walfrido Hernández Mesa
Co-President

Luis Sánchez-Harguindey Pardo
Co-President

What you need to know about the Corporación Habanos, S.A. Code of Conduct

What is our Code of Conduct?

Our Code of Conduct is a document that is a part of our Employment Collective Agreement; it is a summary of the diverse practices and policies relating to the behavior of the employees and the company.

The Code of Conduct sets up the standards of responsible behavior that all employees of Habanos, S.A., are expected to follow. It is designed for all the employees to be up to these behaviors.

Who should follow the Code of Conduct?

The Code of Conduct applies to every employee in Habanos, S.A., regardless of role and location. We must all always follow the standards and behaviors set out in the Code of Conduct.

In addition, all contractors and consultants employed by the Company, as well as the distributors, franchisees and licensees must also work within the standards and behaviors outlined in the Code when conducting business on our behalf.

Why is the Code of Conduct important?

We must ensure all our activities are conducted with the utmost integrity. The Code of Conduct is essential for the evolution of our long-term sustainability and the fulfillment of our sales growth strategy.

The Code of Conduct is a key element of our internal control policy, to ensure that we have the appropriate controls to support employees when they fulfill their roles while conducting business on behalf of Habanos, S.A.

What can I do if I have a query or concern?

The Code of Conduct cannot describe all the situations that may take place. If you are unsure, there are a number of ways to look for help or advice.

If you have concerns as to what decisions you should make in any given situation, it might help if you ask yourself:

Is it legal?

Is it ethical?

Is it in line with Habanos, S.A. Code of Conduct?

Am I setting a good example?

Would I be comfortable explaining my actions to my colleagues, family and friends?

Would I or Habanos, S.A. be comfortable if others learn about my actions through the media?

Have I consulted my colleagues who have knowledge of the issue to help me make a grounded decision?

If you are concerned about the measures adopted by some colleague, it may be that by simple talking to him, you could resolve the situation. Otherwise, you should discuss your concern with your director or with the Legal Division of Habanos, S.A.

Compliance with our Code of Conduct

All Habanos, S.A. employees must comply with the standards set out within this Code. When a violation of the Code of Conduct has taken place, appropriate disciplinary action will be taken accordingly.

BUSINESS INTEGRITY

Conducting business with integrity will support the sustainable growth of our business.

We are committed to dealing honestly, fairly and lawfully with all parties with whom we conduct business.

This section contains:

1. Legal Trade
2. Money Laundering
3. Competition and Anti-Trust
4. Anti-Bribery and Corruption
5. Gifts and Entertainment
6. Responsible Procurement and Supplier Partnerships
7. Political Engagement
8. Customs and Tax
9. International Sanctions and Trade Restrictions

1. Legal trade

The prevention and elimination of smuggling and counterfeiting is one of our major business priorities. We must never engage in or facilitate illicit trade activities.

We must ensure that we only conduct business with companies and individuals of good reputation. We must work with governments, regulator bodies and law enforcement authorities to prevent the illicit trade of our products.

The illicit trade of our products has a damaging effect on our Company. It is contrary to our commercial interests and harms our business reputation and our brands. It diminishes the legitimate markets in which we operate to compete for market quota. It deprives governments of revenues and tempts consumers to purchase products from unregulated sources. In addition, the illicit trade undermines the regulations which govern the legitimate tobacco industry and may be connected with other serious criminal activities such as money laundering or drug trafficking.

Illicit Trade products include:

Contraband of legitimate products purchased on a duty paid or duty free basis but smuggled into and sold illegally in other markets in contravention of fiscal or customs laws. These products are known as “black market products”.

Counterfeit of products which illegally copy existing brands which are manufactured and/or sold in violation of trademark rights, often smuggled into other markets to be sold without paying the correspondent duty.

We must:

1.1	Supply products only in quantities proportional to their consumption in the destination market.
1.2	Ensure legally binding written agreements are in place to cover all relationships with customers, distributors, licensees and other third parties.
1.3	Thoroughly Investigate all incidences of the product and take the corresponding measures to mitigate the risk of additional diversion.
1.4	Attempt to ensure that our customers share our standards for integrity and are aware of relevant elements of said standards.
1.5	Ensure customers, distributors, licensees and other third parties are appropriately evaluated prior the approval of signing the agreement, in accordance with procedures for approving new distributors, franchisees, licensees and service suppliers.
1.6	Report any suspicion related to the illicit trade of tobacco products to

	Commercial Vice-President, Sales Control Director or Security Division, gathering as much information as possible prior to doing so but without compromising either your own safety or the safety of other third parties.
1.7	Ensure that any proposal to suspend and/or terminate the supply of products to our customers because of the illicit trade activities with prior notice to the Legal Division.
1.8	Review annually all data of our customers.

We must not:

1.9	Expose ourselves to a personal risk or danger when gathering or reporting suspected incidences of illicit trade activities.
1.10	Continue to trade with customers identified as being involved, deliberately or recklessly, in illicit trade.
1.11	Deliberately ignore or obviate any suspicion regarding the implication of a customer or supplier in the loss of our products in the legitimate supply chain.

2. Money Laundering:

We must never engage in or facilitate money laundering.

We must ensure that our products can not be used for money laundering activities or for concealing the revenue from criminal activities.

We must:

2.1	Only accept payment from the customers, distributors and other companies or individuals with whom we commonly conduct business and with whom we have carried out full and proper due diligence and verification (including financial checks).
2.2	Immediately raise any concerns to Commercial and Financial Vice-Presidencies or Security Division, for exemple, after having heard a rumor which suggest that a customer is or may be involved in illicit trade activities.
2.3	Be very careful in all circumstances that suggest improper financial transactions might be taking place. Some examples of such activities are: - a customer who is unwilling to provide general, personal or business information; - a customer who wants to pay large amounts of cash; - a customer who appears unconcerned with price or other terms and

	conditions of purchase; - a customer or supplier who wants to be paid into a bank account in a country different to his country of residence or social domicile.
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We must not:

2.4	Accept any cash or cash equivalents that are, or could be, the proceeds of criminal activity.
2.5	Ignore, deliberately or recklessly, any of the “red flags” that suggest improper financial transactions might be taking place.

3. COMPETITION AND ANTI-TRUST

Corporación Habanos, S.A. is committed to competing fairly and honestly with other enterprises in the same sector, and in this regard we must comply with the anti-trust and competition laws that affect our business activity.

The general principles set out in this section are presented for guidance purposes only. Competition laws that are applicable to a market prevail. In this regard, we must be all aware of the competition laws that exist in each market.

3.1 Agreements/Contact with Competitors

By virtue of the applicable laws,

We must not:

3.1.1	Make or indicate, either directly or indirectly, a willingness to agree prices, discounts or other terms of trade with competitors, including setting minimum or maximum prices, stabilizing, altering or co-ordinating the prices.
3.1.2	Agree with the competitors the quality or quantity of products to be supplied into a particular market or customer group.
3.1.3	Engage in any form of bid rigging.
3.1.4	Agree with the competitors a boycott to a supplier, customer or distributor.
3.1.5	Agree with competitors to divide up markets, customers or product categories.
3.1.6	Discuss or exchange commercially sensitive information with competitors, including customer and product information.

3.2 Trade Associations

We must not:

3.2.1	Impose or agree fixed or minimum resale prices with customers or distributors, or dictate their profit margin or the maximum level of discount they can offer, taking into consideration legislations of each country.
3.2.2	Sign Exclusive Distribution and Franchise Agreements with restrictive clauses regarding territories and passive sales that violate the anti-trust laws of each country.

3.3 Information Gathering

We must:

3.3.1	Understand what kind of competitive information we can gather and how we may use it.
3.3.2	Ensure that our own competitive information is not disclosed either directly or indirectly to competitors.

We must not:

3.3.3	Attempt to gain access to information regarding the business activity of a competitor by illegal or inappropriate methods, including: - developing of industrial espionage or undercover surveillance to access information which is not publically available; - hiring competitors' employees for the purpose of obtaining confidential information or important information from the commercial point of view; - approaching competitor's customers or employees to obtain confidential information.
3.3.4	Adopt methods of gaining information which may be considered either inappropriate or illegal.
3.3.5	Accept, disclose or use information that we know or have reason to believe was disclosed confidentially or by a confidentiality agreement between a third party and one of our competitors. For example, information about a competitor's proposal while a negotiation process is still going on.

3.4 Monopolising or Abusing a Dominant Market Position

We must:

3.4.1	Seek legal advice in each market on the activities that may cause a dominant position abuse. This includes: - bundling or tying different products and services together - using excessively aggressive discounting or incentives designed to drive out competitors - discriminating unfairly between customers, for exemple, charging different prices to customers of similar position, without objective justification - limiting production to prejudice customers - refusing to supply new or existing customers without objective justification
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4. ANTI-BRIBERY AND CORRUPTION

Compliance with bribery and corruption laws is compulsory. We must not offer, give or accept any gift, payment or other benefit, seeking an improper advantage for our company.

We must:

4.1	Bring any request or demand for a potentially corrupt payment by a third party to the attention of our line manager
4.2	Follow the special rules that apply to government officials and consultants.
4.3	Address all “red flags” that indicate there may be a corruption risk. Some examples of this kind of alert We must not ignore: <ul style="list-style-type: none">• When the country has a history of corruption problems.• The customer is not a resident or uses shell or ghost companies.• A consultant is related to, or recommended by, a public official.• A consultant requests for “urgent” high commission payments relative to the services offered.• A customer uses a bank account opened in a tax haven or belonging to a third party.• A customer, agent or consultant refuses to sign an agreement that meets Habanos, S.A. standards.
4.4	Actively discourage the use of facilitation payments in markets we operate.
4.5	Seek guidance from your line manager, Legal Area of the Group and Security Division.

We must not:

4.6	Pay, offer, accept or authorize a bribe or a facilitation payment, or ask anybody else to do so.
4.7	Offer or give anything of value in order to ensure or contract business or for any other purpose
4.8	Make or authorize an improper payment or bribe to a government official or employee of a state-owned or controlled business.
4.9	Attempt to induce a public official to do something illegal.
4.10	Ignore or fail to report a corrupt activity
4.11	Establish an unrecorded fund (such as a secret cash or off-the-books account) for any purpose.
4.12	Encourage or facilitate someone else to commit or ignore a corrupt activity.

5. GIFTS AND ENTERTAINMENT

When giving or receiving gifts or entertainment, we must ensure that doing so cannot distort our business relationship, create a conflict of interest or be construed as a bribe.

We must:

5.1	Always receive prior written authorization from the Co-presidents before giving or receiving anything, regardless of its value, from a public official or employee.
5.2	Have commercially justifiable purpose for every gift or entertainment.
5.3	Take into consideration the Internal Norm on Gifts and Entertainment before giving or receiving any gift or entertainment.

We must not:

5.5	Offer, give or accept anything illegal or unethical, or which would result in a violation of law or of our Code of Conduct.
5.6	Offer, give or accept any cash or benefits in turn for a commercial favor, for example, from a supplier to obtain an agreement.
5.7	Always unacceptable: <ul style="list-style-type: none">• Anything illegal or that could be perceived as a violation of local law or our Code of Conduct.• Gifts, cash or cash equivalents.• Offering, giving or receiving anything as part of an agreement to do or gain something in return.• Any event that could be considered inappropriate, or anything that might adversely affect the reputation of Habanos, S.A.

6. RESPONSIBLE PROCUREMENT AND SUPPLIER PARTNERSHIPS

We must only do business with trustworthy suppliers who have a reputation for conducting their business affairs in a professional and ethical manner.

We must:

6.1	Adopt a responsible attitude when selecting suppliers, completing due diligence to ensure that their practices will not in any way damage our reputation.
6.2	Ensure that our supplier agreements incorporate our Code of Conduct to make certain that our suppliers are aware of our ethical standards and agree to comply with the overriding principles of the Code of Conduct.
6.3	Ensure that our day to day suppliers are aware of our Code of Conduct in their concern, referring, for instance, to contract for office maintenance and cleaning.
6.4	Encourage and support all of our suppliers to adopt our standards.
6.5	Always act in compliance with our Group Procurement Policy.
6.6	Raise any concerns related to supplier activities to the respective Vice-presidency, so that the potential risks may be appropriately investigated.

We must not:

6.7	Accept or ignore supplier activities which may infringe the Human Rights Policy or our Code of Conduct.
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7. POLITICAL ENGAGEMENT

Engagement with Governments, legislators, industry bodies and public interest groups is an important and necessary element of our business activity. Such engagements must be completed according to the Law.

We must not:

7.1	Represent or claim to act on behalf of the Company in any political activity which we are carrying out as private individuals.
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8. CUSTOMS AND TAX:

We must act with integrity in all our contacts with any Government authority, including customs and tax officials.

We must:

8.1	Ensure all appropriate local destruction and tax reclaim documentation is accurately completed in order to include product volumes and values.
8.2	Ensure that our documentation is delivered according to the Customs rules

	and regulations.
8.3	Make sure that our product is distributed in a supervised environment, with updating of the local accounts and financial records with the purpose of registering all inventory destructions.
8.4	To be acquainted and comply with all the standards and restrictions in relation to the work with public officials and their employees or contractors.
8.5	Be honest, accurate and open in all our statements and certifications.

We must not:

8.6	Accept or ignore any suspected violation of our standards on customs and tax and discuss any concerns with our line manager and the Financial Vice-Presidency or Legal Division.
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9. INTERNATIONAL SANCTIONS AND TRADE RESTRICTIONS

We must understand and comply with all international sanctions and trade restrictions.

We must:

9.1	Understand what sanctions and trade restrictions may be relevant to our functions and responsibilities.
9.2	Comply with all sanctions and trade restrictions.

We must not:

9.3	Accept or ignore any suspicion that international sanctions or trade restrictions are being violated.
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RESPONSIBLE COMMERCIAL PRACTICE

We must ensure responsible and honest commercial practice when managing our business affairs.

Good corporate and individual conduct is essential when working with Habanos, S.A. assets, records and information.

This section contains:

10. Accuracy of Accounting, Financial Record Keeping and Notifications
11. Use of the Company Property, Assets and Resources
12. Intellectual Property
13. Responsible Advertising and Marketing
14. High Standards of Products and Business Processes
15. Privacy of Information (Data protection)
16. Electronic Communications
17. Information Management
18. Confidential Information
19. Conflicts of interest
20. External Communications

10. ACCURACY OF ACCOUNTING, FINANCIAL RECORD KEEPING AND NOTIFICATIONS.

We must honestly, accurately and objectively report and record all of our financial and non-financial information as this allows the Company to make decisions based on commercial activity, safeguard our resources, fulfill our responsibilities and achieve our legal and regulatory requirements.

We must:

10.1	Ensure all financial reports, notifications, forecasts and analysis we are responsible for is submitted honestly and accurately.
10.2	Comply with all laws, external accounting requirements and Company procedures for reporting financial and business information.
10.3	Demonstrate integrity and care when delivering our own travel expense and when approving those of others.
10.4	Avoid cash transactions. If there is no alternative, cash transactions must be authorized, properly recorded and documented.
10.5	Ensure contractual commitments we make on behalf of the Company are within the scope of our delegated authority.
10.6	Make all efforts to identify any potential misrepresentation of accounts, data or records or any incidence of potential fraud or deception and raise any concern about the accuracy of the financial reports to the Financial Vice-President.

We must not:

10.7	Prepare or submit any information with the intention of misleading the record.
10.8	Make a dishonest or deceptive entry in any report or record.
10.9	Misrepresent the correct purpose of any transaction
10.10	Create an unrecorded or improperly described fund for any purpose
10.11	Sell, transfer or dispose of any Company asset without prior authorization and appropriately completed documentation.
10.12	Modify any Company record unless authorized to do so by established policies and procedures
10.13	Engage in any activity aimed at falsely exaggerating or moving sales volume or profit between reporting periods as this would distort our financial position.
10.14	Provide any information, either verbally or in writing, about our transactions that would make it possible for a customer or supplier to make inaccurate or deceptive financial statements.

11. USE OF COMPANY PROPERTY, ASSETS AND RESOURCES

Company property, assets and resources are at our disposal for business purposes. We must ensure their proper and appropriate use.

We must:

11.1	Protect and use the Company funds and property in the same way we use our own, safeguarding them against theft, loss, fraud or deceit.
11.2	Ensure all business expenditure, including personal expenses, is supported with honest, accurate and appropriate invoices, vouchers and documentation.
11.3	Ensure we only make reasonable personal use of Company supplied electronic systems, including personal computers, laptops and mobile devices.

12. INTELLECTUAL PROPERTY

We must protect the Habanos, S.A. intellectual property, made up by elements such as trademarks, design rights and copyrights, since they are valuable corporate assets.

We must:

12.1	Protect the Company intellectual property assets and, given their importance to our business, we must also respect the intellectual property assets of third parties.
12.2	Report any product which we suspect may infringe the Company intellectual property rights including copycat products and suspected counterfeit products.
12.3	Ensure written agreements are in place to make certain that the Company is the owner of intellectual property rights of materials which are created or developed for us.

We must not:

12.4	Use names, trademarks or other design elements which consumers might associate with some others when marketing or promoting Company products.
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13. RESPONSIBLE ADVERTISING AND MARKETING

Our commercial activity is subject to specific advertising and marketing requirements based on law, industry codes, voluntary agreements and our own Standards. Regardless of where we work, we must apply these Standards at all times.

We must:

13.1	Ensure that all of our tobacco products distributed by us, have clearly visible health warnings, according to the regulations in each country.
13.2	Always respect our Advertising Policy and International Marketing Standards, as well as the local cultures, practices and traditions which exist in our market.
13.3	Illustrate and describe our products in a fair and honest way that will not mislead consumers.
13.4	Ensure all claims we make are true and can be substantiated.

We must not:

13.5	Advertise or market our products to those under 18 years old. This includes the use of images or other content which could be perceived as attractive by minors.
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14. HIGH STANDARD OF PRODUCTS AND BUSINESS PROCESSES

Delivering high quality products and services to our customers and consumers is essential to the sustainability of our business.

We must promote high standards actively seeking to improve our working practices in all aspects of our company and in particular our sales operations.

We must:

14.1	Demonstrate our commitment with high standard compliance, focusing constantly our attention on the quality in everything we do.
14.2	Continually seek to improve efficiencies in our commercial activities, services and product quality.
14.3	Support the delivery of our objectives by following and maintaining defined processes.
14.4	Ensure all relationships with business partners including customers, suppliers and third party producers are managed in accordance with our standards.

14.5	Maintain effective controls to ensure that any standard or quality issue is quickly identified, allowing us to adopt corrective actions.
14.6	Challenge the problems and support the process of encouraging team work to improve our performance standards.

We must not:

14.7	Accept or ignore poor standards
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15. PRIVACY OF INFORMATION (DATA PROTECTION)

We must treat the personal information with respect and confidentiality in accordance with our obligations of privacy and data protection laws.

We must:

15.1	Only collect or use the information about employees, customers, suppliers and other individuals to the effects of the Company's activity.
15.2	Ensure that individuals whose information we hold know we have it and understand what it will be used for.
15.3	Share the information about employees, customers, suppliers and other individuals, sólo if the person, whose information we store would expect us to do that.
15.4	Keep with security the information about employees, customers, suppliers and other individuals, whether it is held in electronic or printed format.
15.5	Restrict access to the information about employees, customers, suppliers and other individuals to those who need to know it.
15.6	Ensure that the information on the employees, customers, purveyors and other persons is accurate and updated.
15.7	Delete or destroy the information about employees, customers, suppliers and other individuals as soon as there is no more need for it.
15.8	Ensure that employees who handle the information about employees, customers, suppliers and other individuals understand their responsibilities and put them into practice.
15.9	Comply with any additional legal requirement, concerning the information about employees, customers, suppliers and other individuals.

We must not:

15.10	Transfer information about employees, customers, suppliers and other individuals to the countries lacking adequate protection
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16. ELECTRONIC COMMUNICATIONS

We use electronic equipment to help us to do our work. The electronic equipment and the information it contains is Habanos, S.A. property. The Company reserves the right to monitor or filter any content or communication in order to protect the Company from security breaches, loss of information or legal actions.

We must:

16.1	Protect equipment from unauthorized use or theft when unattended.
16.2	Ensure the personal comments or remarks do not damage the reputation of the Company or commit the Company to something over which we have no authority.
16.3	Protect confidential information when traveling or sending information to others.
16.4	Report any loss of confidential Company information.

We must not:

16.5	Install applications to any Company device or connect it to any other equipment unless approved by the Informatics Department.
16.6	Disable equipment security measures.
16.7	Access, store or share anything that could be considered offensive to others or could expose the Company to legal actions.
16.8	Share our personal passwords with others.

17. INFORMATION MANAGEMENT

Our corporate records contain valuable information which is used by the Company to provide evidence of our activities and decisions. They also enable us to demonstrate that we are fulfilling our regulatory and legal obligations.

Whenever we record information we must do so accurately and ensure we maintain the appropriate level of confidentiality and security.

We must:

17.1	Carefully and accurately record the business activities for which we are responsible.
17.2	Ensure that records are kept in a way which allows sharing them appropriately.
17.3	Comply with all legal and business requirements for keeping records.

17.4	Review records on a regular basis and safely dispose of those which no longer need to be kept or which must be disposed of in accordance with law, including the compliance with rules on data protection.
17.5	Comply with any request received from Legal Division to suspend the disposal of records, including requests concerning pending litigation or regulatory investigation.

18. CONFIDENTIAL INFORMATION

We create, use and share confidential information on a daily basis. This information is considered confidential when it is not available to the public knowledge. We must protect this information in order to safeguard our own and the Company's interests and reputation.

Restrictions on sharing confidential information apply until it gets available to the public and remain in force even when we are personally no longer employed by the Company.

We must:

18.1	Take particular care not to discuss or comment anything about the I confidential information in public areas, where it could be seen or overheard.
18.2	Ensure that security measures are in place to make certain that confidential information cannot be lost or stolen, particularly when traveling or when sending it to others.
18.3	Ensure that appropriate formal arrangements are in place relating to the necessary release of confidential information.

We must not:

18.4	Disclose information which is not publicly available to others inside the Company, unless they have commercial reasons to know it.
18.5	Disclose information to people or organizations outside our business, except such disclosure is required for business purposes or by law.
18.6	Intent to obtain or use confidential information related to other people including our competitors, even if we are receiving the information indirectly.
18.7	Make use of confidential information from a former employer

19. CONFLICTS OF INTEREST

Our business decisions must always be made in the best interests of Habanos, S.A., and we must never allow our personal or family interests to conflict with our obligations to the Company.

We must:

19.1	Avoid situations where our personal interests or those of our partner, family member or close relative might come in conflict with the interests of the Company.
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We must not:

19.2	Use our position in the Company for personal benefit or for the benefit of our partner, family member or close relative.
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20. EXTERNAL COMMUNICATIONS

Our reputation depends of our professional and ethical behavior. All we do and say and everything our external stakeholders say about us defines the Habanos, S.A. reputation.

We must protect the integrity of the information we provide by ensuring we give everyone equal access to honest and accurate information.

We must:

20.1	Ensure there can be no misunderstandings between our personal views and those of the Company. For example, we must not use the Company's letterhead, logos or e-mail system to express personal views or for any personal matter.
20.2	Ensure media announcements and press releases are approved by an appropriately authorised person or by the Operational Marketing Division.
20.3	Ensure regulatory presentations and public statements are approved by the authorized persons of the Board of Direction.
20.4	Refer any approach made by an investor or financial analyst to the Investor Relations team.
20.5	Refer media and press enquiries to an appropriately authorised person or to the Commercial Vice-Presidency.

We must not:

20.6	Talk about or write anything on behalf of the Company unless we have been authorized to do so.
20.7	Converse or write anything on behalf of the Company about subjects extending beyond our own area of responsibility.
20.8	Write anything on Weblog sites unless we make it explicitly clear that we are expressing personal points of view or opinions and not those of the Company or the Company's Management.

TRUST, RESPECT AND RESPONSIBILITY

Our business activities directly or indirectly affect communities and societies around the world.

We are committed to building a work environment that promotes integrity, teamwork, diversity and trust.

This section contains:

21. Discrimination and Harassment
22. A Healthy and Safe Work Environment
23. Environmental responsibilities
24. Human Rights
25. Community Involvement and charitable Contributions

21. DISCRIMINATION AND HARASSMENT

We must all play our part in maintaining a workplace fair, respectful, free of any form of harassment, discrimination or any other kind of demanding behavior.

We must:

21.1	Treat all colleagues fairly and equally in accordance with their capacity to meet the requirements and standards of their job.
21.2	Demonstrate respect for cultures that may differ from our own.
21.3	Recruit, develop, promote, provide other conditions of employment, for any person, regardless of age, race, origin, gender, sexual orientation, disability, political view, religion, marital status or physical or mental health or any other legally protected status.
21.4	Be reasonable in adapting yourself to employees' disabilities, religious beliefs or practices.

We must not:

21.5	Allow any discriminatory factor to influence our decisions, either directly or indirectly, with regard to an individual's recruitment, reward or career progression.
21.6	Engage in any form of harassment or abuse, or any behavior that could be perceived as offensive, intimidating, malicious or insulting.
21.7	Accept or engage in any form of behavior that excludes an individual or group of individuals from team or group activities, social engagements, team events or any other activity undertaken in their team.
21.8	Accept or engage in any form of behavior that creates a hostile working environment.

22. A HEALTHY AND SAFE WORKING ENVIRONMENT

We must behave in a manner that promotes a positive Health and Safety culture and challenge the unacceptable or potentially dangerous behaviors.

We must:

22.1	Conduct our job in compliance with the Health and Safety laws and our own Occupational Health, Safety and the Environment Policy as this may exceed what local laws dictates.
22.2	Understand the hazards in an emergency situation, and test our understanding.
22.3	Proactively consider our own health and safety and that of the colleagues and others.
22.4	Integrate health and safety considerations into our daily work activities.
22.5	Report to your Human Resource Manager all accidents, incidents, failures and breaches in compliance with Occupational Health and Safety.

We must not:

22.6	Accept or ignore any suspected poor practice concerning health and safety.
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23. ENVIRONMENTAL RESPONSIBILITIES

We are committed to introducing more environmentally sustainable ways of working. We all have a role to play in reducing the impact that our activities have on the environment.

We must:

23.1	Reduce the impact of our daily activities on the environment by: <ul style="list-style-type: none">- favoring the use of renewable materials and the development of sustainable environmentally packaging, while continuing to meet customer expectations and consumer preferences.- modifying our own behavior to reduce our impact on the environment by reducing waste, cutting out unnecessary travel, saving water and energy.- ensuring unavoidable waste is reused, recycled or disposed of in a responsible way.- taking all the necessary actions to prevent violations of our Occupational Health Safety and the Environment Policy.
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We must not:

23.2	Ignore or accept any suspected or known violations of our Occupational Health, Safety and the Environment Policy.
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24. HUMAN RIGHTS

We must promote and protect Human Rights and ensure we do not, directly or indirectly, contribute to any violation of those Rights.

We must work towards the elimination of any abuse in Human Rights which may exist in the labor market, particularly in case they are in any way connected to our business activity or supply chain.

We must:

24.1	Work with our suppliers, licensees, agents and joint ventures to encourage and support their implementation of minimum age/forced labor standards.
24.2	Encourage everyone who either directly or indirectly works with us to comply with our standards.
24.3	Protect the right of all employees allowing freedom of thought, conscience and religion, as well as the freedom of opinion and expression.
24.4	Respect the rights of all employees in case of any violation of their right to equal protection against discriminations.

We must not:

24.5	Engage anyone under the minimum working age stipulated in each case, or under the compulsory schooling age.
24.6	Allow or make any distinction against any employee on the basis of his political, religious or jurisdictional status of the country or territory to which he belongs, ensuring when necessary that valid working permits are in force for those working outside their country of origin.
24.7	Allow any discrimination arising from an employee's right to freely participate in his community culture.

25. COMMUNITY INVOLVEMENT AND CHARITABLE CONTRIBUTIONS

We are committed to making a positive contribution in those communities where we work.

We must:

25.1	Take special care when considering to make charitable contributions, making prior request to the Board of Direction of the Company and to the public officials, bearing in mind that We must avoid everything that may create a conflict of interests, that could be regarded as bribe or corruption, or that may enter in conflict with our standard on gifts and entertainment.
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25.2	Refer to our Marketing Standards to ensure that any proposed donation would not in any way violate our own policy.
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We must not:

25.3	Give any charitable donation to any unregistered entity or non-profit organizations whether are informal or unrecognized as well as to individuals or organizations when due diligence has not been conducted.
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CODE OF CONDUCT ADMINISTRATION

Our Code of Conduct is specifically designed to ensure consistency in the compliance with the management of our commercial activities whether inside or outside the Company.

Habanos, S.A. is committed to truth, openness and objectivity in all its activities.

Procedures to investigating and handling potential violations of the Code of Conduct will be in accordance with the legislation in force.

Responsibilities:

The Co-presidents of Habanos, S.A. are responsible for administering our Code of Conduct.

All executives of Habanos, S.A. are responsible of complying with the Code of Conduct by themselves and their subordinates.

All the executives are responsible of notifying, honestly and accurately, all actual or potential violations of the Code of Conduct.

If an executive identifies a potential violation, he proceeds to inform it to the Vice-President of Logistics, who, together with the Legal Director, the Director for Human Resources, the Director for Security and Protection and the Head of Cadres and Training, will determine the process to be followed.

In all cases of violation of the Code of Conduct, the same procedure will be used for the application of the disciplinary measures, according to the legislation in force.

Signatures and Acknowledgment

All the employees, including the new ones, must sign an acknowledgment document, confirming they have read the Code of Conduct and will abide by its provisions.

Not having read the Code of Conduct or signed the acknowledgment will not release an employee from complying with said Code.