

NewAge Global Human Rights Policy

Opening Statement

NewAge, Inc., is committed to respecting Human Rights throughout all global operations, in our supply chain and in the communities in which we operate. NewAge's global commitment to Human Rights is a core component of how we do business.

For the purpose of this statement, Human Rights is defined as the fundamental rights inherent to all human beings regardless of nationality, place of residence, gender, gender identity or expression, national or ethnic origin, race, color, religion, veteran status, age, language, sexual orientation, physical or mental disability, or any other status.

This policy applies to all subsidiaries within the NewAge organization around the world, and serves as a response to the requirements of the section 54(2) of the UK Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

In all of our operations, the Company will use this policy as a framework to guide our decision making and practical engagement on Human Rights issues.

Our Commitment

To ensure the principles stated herein become an everyday part of how we do business, we have integrated them into the NewAge Global Human Rights Policy, the NewAge Environmental Policy, the Supplier Code of Conduct, and other relevant policies and procedures. More information can be found on our corporate website at:

<https://newage.com/en-us/our-story/corporate-social-responsibility>.

We are committed to creating and sustaining a culture where everyone is respected, valued and welcomed.

Guidelines

NewAge strives to respect Human Rights in all aspects of our business including:

Workplace

NewAge values employees and strives to provide a safe environment that provides a platform for growth. We regularly measure global employee satisfaction and engagement through formal surveys. Survey results are reviewed and actioned by executive leadership as well as our Nomination, Governance and Sustainability Committee.

Suppliers

Our high level of commitment and importance placed on Human Rights is a standard we expect from our suppliers and vendors as detailed in our Supplier Code of Conduct. We are working on an audit process to evaluate our suppliers' adherence to our Human Rights Policy — particularly prohibiting the use of child labor or forced labor.

- *All NewAge suppliers must certify that their goods and services were acquired in compliance with applicable laws and regulations related to child and human-trafficking laws in the countries where they do business.*

- *Each supplier shall comply with local, national and international laws and regulations in the performance of its business activities. No supplier shall pay or accept bribes, kickbacks or other illegal inducements in its business and government relationships.*

- *Each supplier shall use its best efforts to provide clean and safe work conditions for their employees, with access to potable water and sanitary restroom facilities, and free from unprotected exposure to hazardous materials or unreasonably dangerous equipment. If suppliers provide residential accommodations for employees, these accommodations must be clean and safe, with adequate emergency exits, secure personal spaces, and reasonable access to warm clean water for washing.*

- *Each supplier shall make reasonable efforts to assure that its employees are not subjected to undue physical strain or risk, and that they have appropriate personal equipment and clothing, in order to prevent serious work-related accidents and injuries.*

Consumers

We strive to follow advertising laws and regulations to not make false statements about our products or our competitors' products. We do not promote our products in misleading ways. Our labeling and marketing review processes are designed for transparency to consumers at all times.

Community

We value and respect the unique communities and cultures where we live, work and do business. NewAge demonstrates its community commitment through charitable donations made through a 501c3 foundation, employee volunteerism, government relations activity and development of relationships with local stakeholders.

Labor

Child Labor

No supplier (either directly or indirectly) shall employ children younger than the age of completion of compulsory schooling (and in no case younger than 15 years old) in violation of local, national or international law (including International Labour Organization Conventions 138 and 182, subject to specified economic exceptions). No supplier shall utilize labor by children under 18 years of age for hazardous work (as defined by Convention 182), including work underground, under water, at dangerous heights, with dangerous equipment, with strenuous labor, with hazardous substances, or for excessive hours.

Forced Labor

No supplier shall force any person to work under threat of physical harm, economic duress or other hardship—whether in the form of forced prison labor, indentured labor, bonded labor or otherwise. Slavery, human trafficking and similar practices—however denominated—are forbidden throughout the entire supply chain for goods and services ultimately provided to NewAge. No supplier shall take possession or control of its employees' identification documents, visas, passports, or financial documents.

Employee Dignity

Freedom of Association and Collective Bargaining

NewAge recognizes that in many of the locations in which we operate, employees have the right to freely associate, or not to associate, with third party organizations such as labor organizations, as well as the right to bargain collectively with their employer in accordance with local laws. The Company acknowledges these rights, and is further committed to creating an environment of open communication in which employees can speak with their managers about their ideas, concerns or problems, and work together to address workplace issues. We encourage our employees to share their ideas, concerns or suggestions through a culture of cooperation and teamwork without retribution or adverse action.

Harassment Prohibition

NewAge is committed to treating employees with respect and dignity and providing a workplace free of sexual harassment or other unlawful harassment. The Company will not tolerate harassment of employees by managers or co-workers, on or off-site. The Company will also endeavor to protect employees from harassment by non-employees in the workplace. All NewAge employees are expected to treat their coworkers, and employees of the Company's customers and suppliers with dignity and respect. Such forms of harassment include, but are not limited to psychological, physical, sexual or verbal abuse, intimidation and bullying will not be tolerated.

Nondiscrimination

NewAge is an equal opportunity employer and prohibits unlawful discrimination against applicants for employment and employees on the basis of race, color, sex, gender, sexual orientation, gender identity, gender expression, national origin, ancestry, citizenship, marital status, military or veteran status, physical or mental disability, medical condition, age, religion, genetic information or any other classification protected by federal, state or local law.

Protection of Women's Rights

We also embrace the United Nations Women's Empowerment Principles (WEPs), established by UN Global Compact and UN Women, grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women's empowerment. In accordance with the WEPs community, NewAge commits to foster business practices that empower women including equal pay for work of equal value, gender-responsive supply chain practices and zero tolerance against sexual harassment in the workplace.

Wages, Salaries, and Hours of Work

NewAge commits to a fair or living wage for all employees.

Employee pay (hourly or salary) is determined by both NewAge's compensation scale and discretion. Factors used to determine employee compensation include, but are not limited to, pertinent training, background, expertise, work ethic, and similar considerations. The determination of a position's exemption status under the Fair Labor Standards Act is a matter of law and is determined by an assessment of job duties and responsibilities.

Occupational Health & Safety

At NewAge, we are committed to protecting the safety and health of our employees. Our safety policy aims to minimize accidents and health hazards by providing employees information and support they need to enjoy a safe working environment.

All employees must strictly adhere to NewAge's safety policy, which includes:

- *Immediately reporting all injuries and accidents to your manager and seeking necessary medical help.*
- *Learning and following the guidelines in the Employee Handbook.*
- *Immediately reporting all hazardous conditions and safety concerns to your manager.*

Managers must support all safety training and procedures and must stay informed about health and safety issues. Managers must never allow production issues, time limitations, or unexpected problems to compromise safety of employees they manage.

All employees must take an active role in ensuring their own safety and the safety of their co-workers.

Employee cooperation and adherence is required for NewAge to provide safe working conditions, as outlined in the Occupational Safety and Health Act.

Right to Water

In accordance with the United Nations General Assembly's Human Right to Water and Sanitation (HRWAS) principle, we recognize access to water as an essential human right and are committed to providing appropriate access to safe water, sanitation, and hygiene to all our employees.

Accountability

The General Counsel, Chief Financial Officer or Chief Executive Officer is responsible for applying this Code to specific situations in which questions are presented. Each of them has the authority to interpret this policy in any particular situation. Any employee who becomes aware of any existing or potential violation of this policy is required to notify the General Counsel, Chief Financial Officer or Chief Executive Officer. Failure to do so is itself a violation of our policy. The General Counsel, Chief Financial Officer or Chief Executive Officer is responsible to notify the Board of Directors of all material Code violations after performing an investigation. Any questions relating to how this policy should be interpreted or applied should be addressed to the General Counsel, Chief Financial Officer or Chief Executive Officer. An employee who is unsure of whether a situation violates this policy should discuss the situation with the General Counsel, Chief Financial Officer or Chief Executive Officer to prevent possible misunderstandings later. Each employee must:

- *Notify the General Counsel, Chief Financial Officer or Chief Executive Officer promptly of any existing or potential violation of this policy.*

- *Not retaliate against any other employee for reports of potential violations that are made in good faith.*

In some cases, compliance with our policies will be monitored by periodic audits. These audits must be performed by the Nomination, Governance and Sustainability Committee or under its direction. All employees are required to cooperate fully with any such audits and to provide truthful and accurate responses to any request. The Nomination, Governance and Sustainability Committee will take all action considered appropriate to investigate any violations reported to them. If a violation has occurred, the Company will take such disciplinary or preventative action as it deems appropriate, after consultation with the Board of Directors. Such action may include dismissal or the event of criminal or other serious violations of the law, notification of appropriate governmental authorities.

Compliance Hotline & Online Reporting

Employees may submit concerns or complaints regarding policy violations by others without fear of dismissal or retaliation of any kind. The Company will not discharge, demote, suspend, threaten, harass, or in any way discriminate against any employee in the terms and conditions of employment based upon any lawful actions of the employee with respect to good faith reporting of concerns or complaints regarding policy violations by others. Notwithstanding the above, any employee who wishes to remain anonymous may forward concerns or complaints regarding possible Code violations on a confidential and anonymous basis to the Nomination, Governance and Sustainability Committee through the Company's Silent Whistle system, as follows:

Online:

1. Go to <https://newage.alertline.com/gcs/welcome> or to www.tellnewage.com
2. Follow the prompts indicated on the website and report the concern or complaint.

Phone:

1. Access the toll-free hotline at 1-888-690-3865, follow the prompts, and report the concern or complaint.
2. Non-U.S. callers: Dial a toll-free AT&T access number for their country, then the hotline number noted above.

An employee's correspondence or telephonic report should contain a detailed description of the relevant facts the employee deems necessary for the Nomination, Governance and Sustainability Committee and, as appropriate, Board of Directors to evaluate the complaint. The Company will not actively seek to determine the identity of an employee who has submitted an anonymous concern or complaint.

Training

We have a commitment to educate our employees on our business responsibility to respect human rights. This Human Rights Policy has been distributed and integrated into training for existing employees as of June 1, 2021, and has been added as a foundational element for all current and future NewAge New Hire training protocols.

Our Intention

The Board of Directors of NewAge, Inc. has assumed the role of overall responsibility for the oversight of compliance with this policy with regards to Human Rights generally. Our intention is to regularly assess the Human Rights risks and impacts of our business activities and carry out due diligence as appropriate to the size, the nature and the context of the operations and the severity of the risks of adverse impacts. We will track our performance and communicate progress regularly.

This policy covers NewAge, Inc.'s operations globally and has been approved by the Board of Directors.