

THE NATURE'S BOUNTY co.

CODE OF BUSINESS CONDUCT

The Nature's Bounty Co.'s purpose is to promote wellness through the power of science and nature by leveraging our expertise as a leading manufacturer, marketer and online seller of nutritionals to create a happier, healthier world.

Our values, which guide us in how we conduct ourselves, are:

- **Sense of Urgency**
- **Flawless Execution**
- **Speak Up, Listen, Take Action**
- **No Excuses**

Our Strategic Imperatives, which guide us in how we conduct our business, are:

- **Core Category Growth:** Commitment to driving core category growth while leading efforts in the most relevant and sizable consumer benefit platforms.
- **Ubiquitous Consumer Access:** Providing ubiquitous access to quality nutritional offerings that meet the needs of consumers across geographic and economic boundaries.
- **Leverage "Best in Class" Consumer Insights:** Operationalize emerging nutritional trends for mass-market innovation and commercialization.
- **Advance "Personalized Nutrition":** Build, partner, and acquire technologies and products to aid in consumer identification and engagement of personal nutrition needs.

This Code of Business Conduct (the "Code") plays an essential role in helping us achieve our purpose and upholding our values and strategic imperatives.

The Code applies to all colleagues, officers and directors of The Nature's Bounty Co. and Alphabet Holding Company, Inc. and its direct and indirect subsidiaries (collectively "Nature's Bounty" or the "Company").

The Code cannot answer every question or address every situation. Consequently, the Company has other various corporate and regional policies, which you should have received as part of your hiring package and throughout the course of your employment. All colleagues, officers and directors of Nature's Bounty (collectively, the "The Nature's Bounty Co. colleagues") should familiarize themselves with and adhere to all applicable policies and procedures.

Moreover, in addition to the Code and the other Company policies, you are responsible for knowing the provisions of the Colleague Handbook and their applicability to your role. It is also

the responsibility of the Company and all The Nature's Bounty Co. colleagues to comply with all applicable laws and regulations wherever we do business.

The Code, the Company policies and the Colleague Handbook are available from the Human Resources Department as well as on the intranet at <http://nacc.nbty.net>.

When in doubt about responsibilities or duties under this Code, please contact the General Counsel's office. In addition, the Company has posted a Q&A at <http://nacc.nbty.net>, which presents certain examples of questions and answers related to compliance with the Code. This Q&A is also available at the Human Resources Department.

The Code is not a contract and does not confer any rights on The Nature's Bounty Co. colleagues.

I. REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR

As part of its commitment to conducting business in an entirely ethical and legal manner, the Company requires The Nature's Bounty Co. colleagues to report, in good faith, information about suspected violations of this Code or of the law by The Nature's Bounty Co. colleagues in the manner set forth below. This Code requires you to come forward with any such information, regardless of the identity or position of the suspected offender.

A. How to Report

You have a duty to adhere to this Code and to all existing Company policies and to report any known or suspected violations as set forth herein. All such reports will be investigated by the Company. The Company shall evaluate reported violations on a case-by-case basis. You are expected to cooperate in internal investigations of misconduct and in all Company audits.

You must report the following to the General Counsel's office; your supervisor or manager; senior management; the Company's reporting hotline at: **1-800-461-9330 for US and for international click [HERE](#)** to obtain the number servicing your country or visit the website at www.convercent.com using login and passcode as nbty: (i) any suspicious activity or behavior (including concerns regarding questionable accounting or auditing matters), (ii) possible violations of the Code, Company policy, law or regulation, (iii) if another The Nature's Bounty Co. colleague asks you to do something that would constitute a violation of law, regulation, the Code or any applicable Company policy, or (iv) any other illegal act. The Nature's Bounty Co. colleagues who use the reporting hotline may do so in an anonymous manner, and all reports will be kept confidential to the extent reasonably possible. Reporting the activity will not subject you to discipline unless you knowingly file a false report.

Those who are found to have violated this Code or other Company policies or applicable law are subject to disciplinary action, including (but not limited to) termination of employment. Violations may also result in criminal prosecution.

B. Zero Tolerance for Retaliation

It is the strict policy of the Company to prohibit retaliation for reports of misconduct by The Nature's Bounty Co. colleagues made with the reasonable belief that the information reported is true. Such retaliation is a serious violation of Company policy and will result in discipline, including possible termination of employment, against the retaliator.

If you believe that you have been the subject of impermissible retaliation, contact your Human Resources representative, the General Counsel's office or the reporting hotline at 1-800-461-9330 or www.convercent.com using name and passcode as nbty.

II. CONFLICTS OF INTEREST

You are expected to devote your best efforts to the interests of the Company in the conduct of the Company's affairs. You may not engage in a transaction involving the Company for your own improper personal profit or gain or that of a third person or other entity.

The Code cannot list every possible conflict of interest, but some common examples of situations that could result in a conflict are:

- **Competing against the Company.** You are prohibited from competing with the Company, directly, indirectly, or in any manner. The Nature's Bounty Co. colleagues and their immediate family members may not invest or have any financial interest in companies that are likely to: (i) compete with the Company; (ii) buy from the Company or sell our products; (iii) sell products or services to the Company; or (iv) otherwise serve as a business partner of the Company, unless your investment or interest meets one of the following criteria:
 - Your interest, together with your affiliates, is less than 1% of the outstanding securities of the business;
 - Your interest, together with your affiliates, is worth less than: x) \$25,000 in a privately owned company, or y) ten percent (10%) of the net worth of a privately owned company;
 - You invest through a mutual fund or similar medium; or
 - The General Counsel's office expressly consents to the investment.

You should never invest in a business where you participate in or influence that business's relationship with the Company or work for or receive compensation of any sort for services from any vendor or competitor of the Company.

Outside employment may also be viewed as competing with the Company. You must advise and obtain approval from your supervisor and Human Resources before accepting any outside job.

- **Use of Company Assets.** You should not use Company time, information or property, including the Company name or its relationships, or your position with the Company, to promote your own personal interests or the interests of third parties.
- **Corporate Opportunities.** You shall not take for yourself business opportunities that are discovered through the use of corporate property, information or your position with the Company.
- **Gifts and Gratuities.** When dealing with customers, partners, and/or government officials, you must ensure that you comply with the Company's Gifts and Entertainment Policy. Vendors may donate gifts for the purpose of raising funds for The Nature's Bounty Foundation charity, a non-profit corporation independent of the Company.
- **Business with Family or Friends.** Doing business with a relative or friend can also create a conflict of interest between you and the Company. You must obtain written approval of the Human Resources Department or the General Counsel's office before doing business with relatives or friends.
- **Family or Dating Relationship.** If you become involved in a dating relationship or have a family relationship with other The Nature's Bounty Co. colleagues this must promptly be disclosed to the direct supervisor or the Human Resources Department.

Please refer to the Colleague Handbook for additional information.

III. COMPANY INFORMATION AND PROPERTY

All The Nature's Bounty Co. colleagues are responsible for protecting Company property, information and data against loss, theft, waste, unauthorized use, and unauthorized disclosure. The Code cannot list every possible measure that The Nature's Bounty Co. colleagues may need to take to protect Company property, information and data, but certain measures you must take are:

- **Accurate and Timely Recording and Reporting of Information.** The Company is committed to accurately reporting financial performance and providing full, fair, accurate and timely business records. The Company requires The Nature’s Bounty Co. colleagues to do their part to assure that all financial statements, accounts and information: (i) accurately and fairly reflect transactions and, in all material respects, the Company financial condition, results of operations and cash flows; and (ii) comply with generally accepted accounting principles (“GAAP”).

The Company expects all The Nature’s Bounty Co. colleagues to follow established accounting and recordkeeping rules and measure and report financial performance honestly, and to follow all internal controls in recording and maintaining the Company’s books and records. In every transaction, whether you are preparing a financial statement, a budget or simply completing a time sheet, you must be honest, accurate, and complete. You may not have any secret undisclosed agreements or side arrangements with anyone — a customer, a distributor, another employee or their family member, or a supplier, vendor or agent of the Company. Transactions must have supporting, reasonably detailed and accurate documentation, which must be recorded in the proper account and accounting period. Company records must be kept and presented in a manner that complies with all applicable laws, including those laws related to financial reporting.

Financial integrity is fundamental to our success, and falsification or misrepresentation of any books, records or reports of the Company will not be tolerated.

- **Records Management Policy and Litigation-related Preservation.** You must ensure accurate maintenance and prompt reporting and recording of all other relevant business information and records in accordance with the Company’s Records Management Policy. If a litigation-related preservation notice is issued to you, you must promptly report and maintain all records outlined in the preservation notice. Under no circumstances can any of the data/records identified in the preservation notice be deleted. If you have any questions, contact the Legal Department.
- **Confidentiality of Company Information.** The Nature’s Bounty Co. colleagues are expected to protect the confidentiality of the Company's proprietary and confidential information at all times. Do not disclose to anyone or use any Company or confidential information (information not disclosed to the public by the Company) for any purpose other than to perform your job or if disclosure is required by law. Your obligation to maintain the confidentiality of our information includes the duty to

disclose such information within the Company only to those who have a business need to know the information.

- **Protecting Personal Information.** You must protect confidentiality of personal information of our colleagues and customers by not disclosing such information to anyone, internally or externally, other than those with a business need for such information and where the Company is legally permitted to do so. Personal Information can include an individual's home address, date of birth, age, race, religion, political affiliation, sexual orientation, identification or financial account numbers, medical information and a range of other information that individuals may not wish to share publicly. Never share any personal information with anyone outside of the Company unless the privacy officer is consulted in advance.
- **Inquiries from the Media and Financial Community.** Do not respond to any inquiries regarding the Company from the media or members of the financial community. The Company requires that all media inquiries and inquiries from members of the financial community (such as analysts) should be forwarded to the [Corporate Communications](#) team.
- **Insider Trading Policy.** You are responsible for complying with applicable federal and state insider trading and securities laws and regulations and with our Insider Trading Policy (including, any applicable preclearance procedure and blackout periods).
- **Privacy.** You must protect against the inappropriate access and disclosure of customer information and the personal information of other The Nature's Bounty Co. colleagues and comply with Nature's Bounty privacy policies.
- **Intellectual Property.** You should make every effort to protect the Company's intellectual property from unauthorized use and respect the intellectual property of others and must comply with applicable laws. You shall not use third party trademarks, copy or reproduce any copyrighted material without permission of the owner of such intellectual property.

IV. FAIR DEALING

The Company conducts its business in a highly competitive market and expects The Nature's Bounty Co. colleagues to compete honestly, ethically and fairly. You should never take unfair advantage of anyone through manipulation, concealment, fraud, abuse of privileged

information, misrepresentation of material facts, or any other practice involving unfair dealing.

V. COMPLIANCE WITH THE LAW

All The Nature's Bounty Co. colleagues must comply with applicable governmental laws, rules and regulations in the jurisdictions that the Company does business. Although not all The Nature's Bounty Co. colleagues are expected to know these laws in detail, they are expected to familiarize themselves with these laws and when in doubt as to whether an activity complies with applicable laws, they should contact the General Counsel's office.

Listed below are certain areas of law that are applicable to the Company's business:

- **Legal Proceedings or Papers.** You must notify the General Counsel's office immediately of any lawsuit, subpoena, legal document, investigation or legal proceeding of any kind relating in any way to the Company. This includes circumstances where you are involved as a witness in a third party legal proceeding due to your work for the Company. Furthermore, no Company files, information or documents or data of any kind may be provided to any outside party in connection with a lawsuit, legal investigation or legal document, without the prior approval of the General Counsel's office. You may not destroy, alter or conceal any documents in connection with any legal proceeding or investigation or in connection with any pending or threatened litigation, proceeding or investigation and must immediately discontinue any automatic destruction process to the extent that it would eliminate any document potentially relevant to such litigation. In addition, you must not lie or make misleading statements in connection with any government or other investigation or any legal proceeding, or cause another employee to do so.
- **Antitrust and Competition.** The Company is committed to strict compliance with antitrust laws, which are intended to promote competition. You are responsible for complying with applicable federal, state, and international antitrust laws and regulations and the Company's Competition Law Compliance Policy. In general, you must not enter into agreements, arrangements or understanding with competitors, suppliers, distributors or customers that curb or restrain free trade or competition. Anyone who violates these laws may face considerable penalties, including imprisonment, criminal fines or civil penalties.
- **Sales and Marketing Practices.** You must not misrepresent our products, prices, or promotions. You are strictly prohibited from making or permitting others to make any claims about our products—whether on labels, in advertising, or on product

information or promotional literature—that are in any way deceptive or misleading or which are not supported by competent and reliable scientific evidence. All advertising and marketing materials, including labels and packaging, must be approved in advance of its use, by Regulatory Operations and the General Counsel’s office.

- **Trade Laws.** The Nature’s Bounty Co. colleagues who are involved in importing or exporting goods must be knowledgeable about and comply with applicable laws and regulations such as custom laws, anti-boycott laws, trade sanctions and embargoes.
- **Anti-Corruption Laws.** You are prohibited from offering bribes, kickbacks or questionable payments of any kind, directly or indirectly, to any customers, suppliers, vendors, government employees or officials, or other parties and must comply with applicable laws and regulations (e.g., Foreign Corrupt Practices Act and United Kingdom Bribery Act) and the Company’s Global Anti-Corruption Policy.
- **Contracting with the Government.** The Company conducts business with and contracts with the Government and must comply with all applicable government contracting laws, regulations and rules. These standards often establish stricter requirements than govern commercial dealings.
- **Political Contributions.** Federal law and the applicable law of many states and countries prohibit corporations from making political contributions. No The Nature’s Bounty Co. colleagues may make a contribution to any political candidate, political party, or other political organization on the Company’s behalf, or in any way that is intended to benefit the Company without the prior written approval of the General Counsel or the Chief Administrative Officer. Similarly, Colleagues may not devote any work time to any campaign for a candidate or political party nor use his/her influence or position of authority to encourage another Colleague to work for or on behalf of any candidate, political party or ballot issue or to make a contribution for any such purpose.
- **Harassment, Discrimination and Retaliation.** The Company is committed to protecting the dignity and respect of all of The Nature’s Bounty Co. colleagues. Unlawful discrimination or harassment in any form is strictly against Company policy. The Company’s equal employment opportunity and sexual and other unlawful harassment standards are contained in the Colleague Handbook.
- **Diversity.** The company is committed to equal opportunity and to fostering diversity in our work environment, which embraces and respects different opinions, views, social customs and cultural traditions. The Company expects you to embrace such diversity and treat each individual equally and fairly, with understanding and respect.

- **Use of Company Equipment -- Etiquette and No Right to Privacy.** Company equipment furnished to you is the property of the Company. As such, Company equipment and its usage may be monitored or accessed with no prior notice. You are responsible for using Company equipment properly and in accordance with Company guidelines. The Company's guidelines regarding use of telephones, computers, communications systems and mail services are set forth in the Colleague Handbook.
- **Environmental Laws.** You are responsible for complying with and understanding applicable federal, state, local and foreign environmental laws and regulations applicable to their jobs.
- **Colleague Safety.** Several types of laws and regulations impose responsibility on the Company to safeguard against safety and health hazards. You are responsible for knowing and following the Company's safety rules and workplace safety program. Please refer to the Environment, Health and Safety Section of your Colleague Handbook for additional information or contact the Company's Director of Environment, Health and Safety.
- **Alcohol and Drug Use.** The use, possession, sale, transfer, purchase or being under the influence of alcoholic beverages, illegal drugs or other intoxicants by The Nature's Bounty Co. colleagues at any time on Company premises or while on Company business is prohibited. Violations are cause for immediate termination of employment. More complete information about the Company standards against alcohol and drug use is available in the Colleague Handbook.
- **Product Safety.** Good Manufacturing Practices (GMPs) are the guidelines established by the Food and Drug Administration to help ensure the safety, purity and effectiveness of the products we manufacture. All The Nature's Bounty Co. colleagues, not just those that work in manufacturing, must be aware of and abide by these guidelines to ensure that we manufacture products of the highest quality. The Company's Standard Operating Procedures regarding the manufacture of goods are available from the Quality Department. All consumer complaints, about any of the Company's products must be reported to the Quality Department. Please contact the Quality Department, Post-Marketing Surveillance Department, or the General Counsel's office with any questions regarding the handling of consumer complaints.

VI. DISCLOSURE/WAIVERS OF THE CODE OF BUSINESS CONDUCT AND ETHICS

This Code is posted on the Company website and is available from the Human Resources Department, the General Counsel's office or at <http://nacc.nbty.net>. The Company will disclose any amendment of the Code or waivers of this Code relating to the Company's Officers or Directors on the Company's website as required by law. Any waiver of this Code for Officers or Directors may be made only by the Board. The provisions of this Code may be waived for Colleagues who are not Officers or Directors only by the General Counsel's office or the Board of Directors. Waivers will be made only where they are in the best interest of the Company and in accordance with ethical and compliance best practices.