

G R O U P E
BEAUMANOIR



ETHICS

CHARTER

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PRESENTATION OF THE GROUP AND THE ETHICS CHARTER

1

THE VALUES OF THE BEAUMANOIR GROUP

The Beaumanoir Group has structured its management around 7 key values that define the responsibility it has towards its clients, co-workers and partners.

Respect

Respect is the promise to accept the diversity of people, to adapt to cultural differences, and to hold ourselves accountable when it comes to following rules and adopting good habits.

Humility

Humility is a strong human value inside the Beaumanoir Group. Being open to others, being self-aware and striving to improve our daily practices is an important commitment for the longevity of the company.

Trading spirit

Having a mind for business is in our DNA and it is what guides us through the steps we take. Every day, we mobilise our skills in order to meet our clients' needs and to support the entrepreneurial spirit inside us: we are driven by our desire to take on new challenges, think outside the box and take initiative.

Responsiveness

It is a requirement and a strength to be able to react quickly in a market that is

always changing. The Beaumanoir Group has implemented an organisation based on its ability to quickly identify new ideas, make decisions and apply them in no time.

Proximity

Proximity is key for building strong and lasting relationships with our employees, our clients, and our suppliers. We know that it is only by being close to our partners that we will be able to understand their needs, meet their expectations, win a mutual trust benefit from sharing our experience.

Passion

We are buoyed by our passion for our work, our enthusiasm, and the "joy that comes in winning together". By joining the Beaumanoir Group, you become part of the "TRIBE"!

Progress

For us, progress is both technical and human and each one of us contributes to it actively. By giving our co-workers true responsibilities and by relying on their lasting skills, we build dynamic organisations that soar into the future.



A LETTER FROM THE BOARD OF DIRECTORS

"You have made the decision to work with the Beaumanoir Group or with one of its subsidiaries: I would like to share with you **our ambitions, commitments and expectations**.

Our Group aims to offer clients of all of its labels a quality sales experience that is respectful and distinguished.

In doing so, our ambition is to offer our client accessible fashion that we build together with our partners.

Through its labels, our Group is able to distribute fashion items to its clients that are high quality and that are priced right, with respect to the mode of distribution chosen.

The quote from Teilhard de Chardin "**Nothing is achieved, everything is yet to be built**", which has become our motto, reflects our willingness to continue to develop our operation, our human resources, and our corporate project in

order to remain a major player in the competitive market that is always changing.

We need you and your full and complete adherence to the values and ethical principles that we uphold. Our lasting collaboration rests on known commitments to integrity and respect for our corporate culture.

Our **main values** are respect, humility, trading spirit, responsiveness, and the sense of responsibility.

Our **ethical principles** are integrity, sincerity, and fairness.

These values and principles must drive our daily actions and must inspire us at every level of the company. We are counting on you to bring them to life!

Sylvain LECOMTE
Chief Compliance Officer

PERSONS INVOLVED

This Ethics Charter applies to all those who represent our labels in the countries where the Group Beaumanoir is present, with respect to international standards, legislations, and local regulations.

If everyone is committed to respecting our values and ethical principles, we will be able to fulfil our mission to protect our image and reputation and it will make it possible for the Beaumanoir Group to continue to grow safely.

Our Ethics Charter, which is available on our website, exists in French and English, so that as many of our co-workers as possible can read it, whether they are in France or abroad. The French version is the reference document in France and the English version is the reference document outside of France.

The role of our co-workers

Each co-worker must **become familiar** with this Charter, commit to **respecting** it in the context of his or her operations and abide by the current laws and regulations.

Good conduct is everyone's responsibility, and this Charter is designed to help each co-worker to act with integrity, serve as a guide, and support his or her in his or her daily choices. Everyone must be **able to anticipate the risks pertaining to his or her role and responsibilities**. This Charter is a way for everyone to weigh their attitude in situations that may be sensitive and/or atypical, that they may come across in internal and external situations.

Then, in case a co-worker would encounter a situation not mentioned in this Charter, he/she can think as follows:

- Does it comply with the law?
- Does it respect the Ethics

Charter?

- Are our internal procedures being implemented?
- If my actions and choices regarding this situation were made public, would they seem inappropriate?

If the situation is not legal, and/or does not comply with this Charter and/or our internal procedures, and/or a public disclosure would make the co-worker uncomfortable, or if there is any doubt, it is necessary to talk about it. Indeed, it is imperative to refer to qualified persons (Compliance team, line manager, etc.), to discuss the ins and outs of the situation.

The Group Beaumanoir has made an alert system available to all employees, described at the end of the Charter, to make it possible for them to address any notification regarding a suspicion of violation of the provisions in the Charter or to get help and counselling that is relevant to the content and the modalities for implementing it.

This system does not do away with the existing channels for employees to express themselves such as speaking to a line manager, to human resources and, in some countries, to personnel representatives and to regional contacts in charge of compliance. The alert system is a recourse that can be used when the situation calls for it.

The role of the Team Leaders

Because of his or her position, a team leader has an even greater ethical responsibility. First, he or she has to make more complex **decisions** and must continually demonstrate **ethical exemplarity**. He or she must also be able to provide the necessary **listening** and **help** to his or her team members.

To **set an example for his or her team**, a

1. Presentation of the Group and the Ethics Charter

team leader can apply the following advice:

- Encourage dialogue and demonstrate respect, transparency and **integrity** with his or her team
- Knowing where the Ethics Charter is, so that he or she can quickly refer to it if necessary
- Have completed the e-learning training "Tous Ethiques", or, for teams abroad, have completed a face-to-face training on business ethics
- Ensure that the Charter is understood by its team members and make it known to new employees
- Never advise, explicitly or implicitly, deviation from the rules of the Charter
- Emphasise and encourage the ethical attitude of his or her team

- Be aware of the ethical issues and questions within his or her profession

Teams may hesitate to come to share their ethical concerns and questions. The team leader can put them at ease by reminding them regularly that he or she is here to **listen** to their concerns that may arise, and that if a co-worker of **good faith** shares his or her concerns, he or she will not be subject to retaliation.

An ethical question must always be answered. Therefore, in case a team leader does not know how to answer to his or teams' questions, he or she must **redirect** them to the competent persons (Compliance team, etc.).

Last, a team leader must also make sure that the goals set for the team can be reached while respecting this Charter.

As a team leader, what should I prioritise between my financial objectives and those mentioned in this Charter?

- › *These two objectives go hand in hand. It is not possible for our Group to achieve financial objectives at the expense of the ethical principles set out in this Charter. It would be contrary to our values and interests. The respect of business ethics is fundamental.*



Are the rules set out in this Charter applicable to everyone, regardless of hierarchical position?

- › *Yes, our ethical rules apply to all the representatives of the Beaucoup Group. It would be unacceptable and against our ethics to make a differentiation according to hierarchical level, status or position held.*

A RESPONSIBLE COMPANY

2

2. A responsible company

Proximity and **respect** are central to our corporate culture. They enable us to build **strong, honest, and fair** relationships with our co-workers, clients, suppliers, shareholders and any other partners or stakeholders.

We are committed to **progress and humility**, which is why questioning is an integral part of our way of thinking and working.

We have a **trading spirit** and want to maintain an **exceptional customer relationship**. Therefore, we offer them affordable fashion products, around the world, while respecting quality and safety standards.

In addition, our guarantee of quality is based on **compliance with the laws and regulations** in all the countries where we operate. Our integrity also enables us to fight corruption.

We are aware of the **social, environmental and societal** risks and challenges associated with our business. Therefore, to improve our impact throughout our value chain, we:

- Respect the Human Rights
- Offer responsible products and services (quality, safety)
- Establish ethical partnerships (confidentiality, fight against all forms of corruption)
- Act to reduce our environmental footprint

The respect and implementation of our **ethical commitments** are indisputable. We do not wish to collaborate with partners who do not conform to our principles.

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2. A responsible company

A COMPANY THAT RESPECTS INDIVIDUALS

We are all invited to **promote and respect** international law that protects **Human Rights** inside our sphere of influence.

We must make sure that we do not partake in violating the Human Bill of Rights and that we eliminate all forms of forced labour or child labour.

Plus, we do not accept discrimination in the workplace and inhumane work hours in from our organisations, and more generally in all those of our business partners, direct or indirect.

Our operations and our development must also proceed with **respect** of the communities and countries in which we are rooted, especially their **social and cultural traditions**, provided that they are compatible with our values.

We would especially like to continue our efforts to build responsible partnerships and thereby contribute to the economic and social development of these parts of the world.

A foreign prospective partner offers me a very attractive product and informs me that he refuses to abide by the legislation in his country in terms of employment law so that he can offer products / services that are less expensive than those of the competition. What should I do?

- › *Whether you are in France or abroad, the Beaumanoir Group's search for a high quality/price ratio must never take precedence over respect for the various legislations that apply in terms of employment law. Speak openly with him and explain the policy of our Group on this topic clearly. If he does not change his way of working, then it is clear that we will not be able to enter into any kind of business relationship with this partner.*



I heard rumours regarding child labour in one of our suppliers' factories abroad, but I did not notice any non-conformity during my on-site visits. Am I supposed to signal these rumours or ignore them?

- › *You cannot ignore these rumours. You must immediately inform the Sustainable Sourcing team which is in charge of the social audit program for our suppliers. In this context, an unannounced audit will be ordered in the factory in order to check the working conditions. If any abnormalities are noted, we implement a corrective action plan with the supplier. If the supplier refuses to undertake an ongoing process to improve working conditions, we will need to end our business relationship with him.*

2. A responsible company

A COMPANY THAT OFFERS SAFETY AND HIGH-QUALITY PRODUCTS

As a pledge of trust and recognition for the Beaumanoir Group's labels towards their clients, the **safety and quality of the products** we sell are a priority.

We commit to **respecting all regulations and norms** that apply to manufacturing and selling our products.

Our products must comply with the control

standards from our Group, and we assess and ensure their safety.

In case of client's claim, co-workers must direct the client to the Customer Service, which is best able to answer to his or her needs. Besides, if the claim reveals a potential safety issue, it is primordial to immediately alert Quality Control or line managers.

Although I don't work in the Quality department, a client contacts me and explain that she had an allergic reaction to one of our garments. How should I deal with this situation?

- › *Regardless of how you find out about it, and even though it may not necessarily be due to our product, you must always and immediately transfer the information to the Customer Service, so that an in-depth study can begin.*



I just received a test report from one of our suppliers, indicating results that are very slightly lower than my label's standards. May I accept it in order to meet the delivery times for the merchandises?

- › *As quality and safety are very important to us, you cannot forego the label's standards. You must discuss it with your superior and with your quality control officer.*

2. A responsible company

A COMPANY THAT RESPECTS ITS PARTNERS AND PUBLIC AUTHORITIES

We act in an **ethical, fair, and professional** way in our relationships with our fellow players in the market, whether we are dealing with public authorities or partners.

Respecting the authorities

In the event of controls or investigations, we must always provide complete information that is precise and correct to the authorities.

We abide by all obligations to **notify** the relevant authorities in any matter pertaining to the safety of our products.

Respecting our partners

We do everything we can to make sure our partners are in a “win-win” partnership. We choose them in a **fair** way, regarding their ability to respect our ethical principles, without any kind of favouritism.

Once they have been selected, we respect their **independence** and their mode of operating. It also means that a commercial relationship where a partner would be very dependent on the Beaumanoir Group to continue its activity should be avoided.

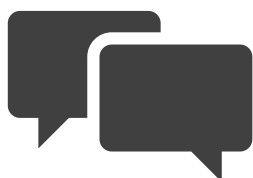
Furthermore, the Beaumanoir Group commits to not use its market position to receive special treatment from its partners (for instance, on payment terms or conditions).

In addition, it is the Group's responsibility to **support** all its partners around the world in understanding and implementing its ethical values.

Last, we commit to respect the **confidentiality** of information shared by our partners.

In am in contact with a supplier who seems to be very good, but right now he does not have any clients. May I work with this company?

- › Yes, but you must keep a close watch on the situation and inform him in writing that he must find other clients. If after a season of collaboration, the Beaumanoir Group is still his only client, it will be necessary to reconsider our relationship with this supplier.



We need a new supplier. Among my two prospective suppliers, one is very competitive in terms of prices, but offers a lower quality. May I communicate the 1st supplier's prices to my other prospective supplier to incite him to lower its prices?

- › Under no circumstances are you authorised to communicate confidential information such as the prices or the identity of your other suppliers. It breaches this Charter and is illegal. Nevertheless, this information can be an asset in your negotiation while respecting confidentiality. It is possible to tell the 2nd prospect that more attractive prices have been offered by another supplier, without giving the name and the price.

A COMPANY WITH INTEGRITY THAT FIGHTS CORRUPTION AND INFLUENCE PEDDLING

All forms of corruption (facilitation payment, bribery, extortion, fraud, etc.) and influence peddling, actives or passives, are strictly **forbidden** by the Beaumanoir Group.

Our corporate culture is based on the principles of integrity, sincerity and equity. These principles drive our actions daily and guide us in our fight against corruption and influence peddling.

Corruption and influence peddling, besides being against our ethics, undermine our business and can damage the trust of our stakeholders. As a result, we have a **zero tolerance** for corruption in all the countries where we operate.

Therefore, to apply our principles and to comply with all laws and regulations fighting corruption and influence peddling, our co-workers must behave with **integrity** in all circumstances.

More specifically:

- It is not tolerated to solicit or accept presents (gifts, invitations, etc.) or money in order to obtain a favour, an advantage or to influence a decision.
- It is not tolerated to use an intermediary and to pay him to use his influence with a third party to obtain a favour, an advantage, or a decision.
- It is not tolerated to offer or promise presents (gifts, invitations, etc.) or money to anyone (partner, supplier, employee, political figure, representative of the authorities, association, organisation, trade union, competitors, etc.) in order to obtain a favour, an advantage or to influence a decision.
- It is imperative to **notify the Compliance team** or a line manager in the event of extortion or attempted extortion to avoid damage.

CORRUPTION VS INFLUENCE PEDDLING



CORRUPTION

WHAT IS IT? Pay or **OFFER VARIOUS BENEFITS** to a public or private decision-maker.

OBJECTIVE: To influence a decision in the course of one's duties. It can be active (the corrupter) or passive (the corrupted).



INFLUENCE PEDDLING

WHAT IS IT? Pay or offer benefits to an **INTERMEDIARY** who has influence over a person holding public authority.

OBJECTIVE: Obtain a decision or a benefit.

Source: Ministère des Finances et des Comptes publics, France, 2016 (free translation from French)

2. A responsible company

- More generally, any co-workers who witnesses or suspects a breach of our ethical principles in the fight against corruption and influence peddling must **report the information** to the Compliance team or this his or her line manager.

Besides, the Beaumanoir Group wants to

collaborate only with partners that commit to respect and implement its ethical principles, in each country.

Failure to comply with our ethical principles of corruption and influence peddling fighting as set out in this Charter may result in **sanctions** (internal and/or legal).

I just received an invitation to a reception from one of my partners. I know that there will be businessmen, politicians and other civil servants present at the reception. May I accept the invitation as a representative of the Group?

- › Yes, if you have received permission from your supervisor to participate.



While I am waiting for a delivery, a customs officer tells me that customers clearance could be expedited for an additional payment. Can I pay him this amount?

- › No, it is a facilitation payment. You must politely refuse and explain that it is not authorised by our Ethics Charter. You must also inform the Compliance team or your line manager.

2. A responsible company

A COMPANY THAT OVERSEES GIFTS EXCHANGES AND INVITATIONS AMONG PARTIES

Gifts and invitations, especially to lunch, among co-workers and partners, that contribute to establishing a good working relationship between people and that may enhance mutual understanding, are not forbidden, but they should be **balanced and respectful** of the ethical principles set in this Charter.

Thus, when a co-worker receives a gift or wants to offer a gift or an invitation in the context of work, he or she must absolutely **inform his or her line manager** to make sure that it is **reasonable** and **acceptable**. Only gifts and invitations that have a symbolic value are tolerated (gift with supplier's logo, or traditional gift such as tea box, Turkish delight, gazelle horns, etc.). These

rules apply at any time of the year, including festive times (New Year's Eve, Chinese New Year, Diwali, Eid, etc.).

You must **refuse** any advantage that may go against the regular rule of fair and healthy competition (always refuse any advantage during a referencing, a negotiation, an audit, etc.).

One should also note that the presents that may be accepted and that are reasonable and acceptable, do not need to be returned to their sender. They must be handed over the Reception or the Communication office of the company, in order to be given out during an annual lottery organised for all employees.

A supplier gives me several inexpensive products. Should I accept them?

- > You should only accept presents that have a symbolic value (presents that have the supplier's logo on them or a traditional gift such as tea, Turkish delight, gazelle horns, etc.). If your supplier's present fits these categories, you may accept it and give it to the Group's Communications office for the yearly lottery. If not, you must politely refuse the gift and explain to your supplier that it goes against our ethical policy. As in all other cases, you may ask for support from your superior in order to make the right decision.



A sales partner with whom I am negotiating a new contract implies that the negotiations would be more "efficient" over a good dinner. I have the feeling that the negotiation's margin will depend on the amount of the bill. What should I do?

- > Remain honest and always refuse such dishonest conditions. We only collaborate on a sound, honest and balanced basis. Talk to your line manager. You may need to contact the management of this partner to alert them on the matter.

2. A responsible company

A COMPANY THAT ENCOURAGES PRIVACY

It is paramount to **guarantee the confidentiality** of the Beaumanoir Group's internal information. Indeed, disclose or misuse such information can be harmful to the Group.

Each co-worker must **protect** our internal information. This **duty of confidentiality** concerns all of us and must be ensured with regard to confidential information and data that we may have access to, whether it pertains to the company, the employees, the clients, or the suppliers.

Thus, we must all guarantee the confidentiality of information by making appropriate communication choices (paper, electronically, handing documents over in person, public spaces, or meeting rooms...). Particularly, before sharing internal information (with our family, our relatives or on social networks) it is imperative that we know what we are allowed to communicate externally.

My relatives often ask me under which conditions we manufacture our products. To what extent do I have the right to answer them?

› You can only disclose information that we have made public (website, CSR report...). If you have information that we did not disclose publicly, it means that it is internal, confidential, and that you must not talk about it.



During a meal at a restaurant, one of my colleagues brought up an important reorganisation project, isn't that a bit reckless?

› Indeed, it is very important that you are careful and discreet when broaching topics that are confidential in a public place (train station, restaurant, hotel, public transportation...), whether it is during a business meal or outside of work, all confidential information from the company must always be protected. We must all avoid divulging any information that may be harmful to the Group.

2. A responsible company

A COMPANY THAT LIMITS ITS IMPACT ON THE ENVIRONMENT

Protecting the environment is one of the Beaumanoir Group's main concerns.

In all operations and locations, the Beaumanoir Group is always careful to respect all applicable environmental norms and legislations.

We are seeking to **reduce our environmental footprint** throughout the lifecycle of our products and through our daily behaviours, regardless of our job position.

To do so:

- We favour eco-friendly practices in

our conduct, and we raise our employees' awareness.

- We use Eco-design principles as a development focus of our products.
- We work to reduce and recycle the packaging of our products.
- We collaborate with our suppliers so that they engage in an environmental performance approach and promote eco-friendly fibres, notably by increasing our use of low impact, organic, recycled, or consciously grown fibres.
- We want to reduce waste as much as possible and to encourage recycling.

Every day, I drive back and forth a substantial distance to go to work. I am aware that it has an impact on the environment and I would like to know if there are any alternatives?

- > *Many co-workers go the same way every day. In order to reduce the cost that each trip represents and in order to limit the impact on the environment, we encourage employees to carpool. We have reserved a space for these kinds of requests on our intranet system or our bulletin boards.*



I am a buyer for a label, and I am particularly concerned about making ecological choices. I would like to improve our products' environmental performance, but my suppliers say it will be much more expensive...

- > *Many solutions are available today and they can be examined depending on your label and your sourcing zone. You should get in touch with the Sustainable Sourcing team so that they can help you to analyse the situation and to find the appropriate response to your initiative.*

2. A responsible company

A COMPANY THAT REFLECTS THE PEOPLE IN IT

In our professional interventions, and more generally, in the statements we make about the Group, its labels and its subsidiaries, **we represent the Group** to third parties.

The Beaumanoir Group wishes to respect its employees' freedom of speech and be available to listen to them, as long as there is goodwill and fair play on both sides.

Therefore, it **concerns all of us when it comes to the image and feeling that want to portray and share with outsiders**, with our clients, professional networks, social networks and in our personal environment. Also, the Beaumanoir Group asks each of its employees to refrain from speaking in the name of the company without **prior permission**.

We are aware of the large space social networks occupy today, and we wish to fully respect everyone's right to express and share their ideas and opinions. Nevertheless, we wish to remind to our teams that they must always show restraint and avoid any situation that may lead statements made by a co-worker to be seen as coming from the Beaumanoir Group.

Together we create our employer's label, and we develop our sense of pride and belonging as **ambassadors!**

During a professional fair, while I was speaking with a colleague about my responsibilities within the Beaumanoir Group, I realised that a competitor's employee was listening to us. I did not disclose sensitive information, but I feel uncomfortable.

- › You must always be careful with what you disclose about the Group and the image you portray, especially when travelling outside. Anyone can use your words to harm yourself or the Group. If you have any doubt or seek advice, contact the Communication department.



During the closing cocktail of a symposium, one of my colleagues drank too much and made disrespectful comments to other attendees. What can I do?

- › Your colleague's behaviour is unacceptable. During this event, and even during the closing cocktail, you all represent the Beaumanoir Group, and you must always behave with integrity. Talk to your colleague about it.

A RESPONSIBLE EMPLOYER

3

3. A responsible employer

Beaumanoir Group's co-workers are an **essential resource** for our performance, and we want to offer them a **good working environment**.

Therefore, we encourage **collaborative work, active listening, solidarity, and respect for diversity**. It provides a fair and beneficial professional setting for all, where everyone can assert their skills.

Furthermore, we commit to respect our co-workers' personal life and the right to disconnect (see our Charter on the right to disconnect), in order to help them finding the balance they need.

Last, **respect** and **caring** are our watchwords, so that everyone is able to express themselves freely.

A responsible employer

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3. A responsible employer

RESPECTING WOMEN AND MEN INSIDE THE COMPANY

Respect is a fundamental value of the Group.

We demonstrate this by our willingness to respect everyone that is part of it without discrimination of any kind.

The Beaumanoir Group is therefore committed to promoting in all its entities real **professional equality** between women and men, supporting **diversity** and the right to work for all, focusing its **social policy on skills and performance**.

Therefore, everyone must have access to hiring possibilities, training, and promotions inside the Group, regardless of age, gender, ethnic or national origins, religion, union status, or even health.

Consequently, any lack of respect, including verbal abuse in the form of racist, discriminatory, sexist, sexual or homophobic statements, or any inappropriate behaviour is contrary to the ethics of the Beaumanoir Group.

One of my colleagues often makes homophobic “jokes”. I am bothered by these comments, what can I do about it?

- › *We do not tolerate such remarks. Homophobia has place neither in our company, nor outside. Everyone deserves full respect. You can explain to this colleague that it is unacceptable and contrary to our ethics, or you can talk it over with your hierarchy or the Human Resources Department.*



When hiring a candidate for a short-term contract, I have the feeling I am being implicitly asked to avoid hiring a disabled person. Should I take this request into consideration?

- › *No, the Beaumanoir Group condemns every kind of discrimination, whether it is when choosing a candidate or during work performance. A candidate is selected solely based objective criteria regarding his or her skills and merit. It is therefore formally forbidden to take such considerations into account. The Director of human resources and the person in charge of handicap access are available to support you in this event.*

3. A responsible employer

RESPECTING HEALTH AND SAFETY IN THE COMPANY

All our teams must work in an environment that guarantees their **physical and mental safety and health**.

The Beaumanoir Group strives to guarantee pleasant workspaces where employees enjoy working, with respect to the current safety and hygiene regulations.

You are also an important link in your safety and that of your co-workers. Therefore, you

must abide by the **safety rules** that apply in the company, **measure the risks** you take and take all **precautionary measures** applying to the situation. You must also always follow the instructions in case of emergency at the workplace.

Human dignity must also be respected unconditionally. Any behaviour or actions that go against these rights, especially moral or sexual harassment, is unacceptable and contrary to our values.

One of my colleagues confide me that her line manager made inappropriate sexual remarks to her, along with looks and, sometimes, derogatory gestures. She fears that talking about would be risky for her career, so she wants to remain silent on this issue. I disagree, but what can I do concretely?

- > It is imperative to talk about it. First, try to encourage your colleague to talk about this issue either to her line manager if she can, or to the Human Resources, or via our internal notification procedure (compliance@groupe-beaumnoir.com), which is explained in this Ethics Charter. If your colleague refuses to report this issue, you need to do it either through the Human Resources or with our internal notification procedure, even if you can feel uncomfortable and you do not have all the elements of the situation. We do not tolerate such behaviour and ensure that we provide the necessary help and support to victims of sexual (and/or moral) harassment.



While I receive packages, I do not have enough place to store the carton boxes. My manager tells me that I can put them in front of one of the emergency exits until I find another place. Can I really do it?

- > No, it is indispensable to guarantee safety by always keeping the emergency exits unobstructed. Remind this to your manager and find a place that threaten none of our safety rules. If your manager keeps advising to transgress our rules, you must talk to the Human Resources.

MANAGING CONFLICTS OF INTEREST

We may all face conflicts of interest someday, especially in relation with our friendships, our family, our financial investments...

Therefore, it is better to avoid, whenever possible, situations in which our personal

interests may conflict with those of the Group.

In such a case, **transparency** is the best policy so that an analysis can be carried out.

My brother just started a business and wishes to offer his service to the Beaumanoir Group. He is offering low prices compared to the competition. May I recommend him to the Directors?

- › *Whether the offer is attractive or not, it is important to signal any potential conflicts of interest, such as with a family relationship. Your brother's offer may still be approved and will be considered in an objective way, like any other offer. Such a relationship cannot influence the company's choice favourably or unfavourably. It is clear that you should not take part in any decision process that may concern your brother's business.*



Recently, my daughter started working for one of our suppliers. A colleague told me that was a risk a conflict of interest. What can I do to avoid such situation?

- › *Indeed, there is a risk of conflict of interest. To avoid such situation, talk about it with your line manager or with the Human Resources to get advice. Besides, both of you must stay careful to guarantee the confidentiality of the information you have access to because of your position.*

RESPECTING PRIVACY AND PERSONAL DATA

For the Beaumanoir Group, the **protection** and **confidentiality** of its co-workers' personal data is very important. Co-workers are defined as employees, interns or temporary workers working for the Group.

Therefore, complying with the "General Data Protection Regulation" and in addition to its legal obligations, the Group commits to only collect its co-workers' personal data to enable the proper operation of its activities.

Hence, co-workers' data collection and processing rules are highlighted in our "Co-workers personal data protection policy", which guarantees that their privacy is protected in the best conditions. Plus, the Group's co-workers will be informed in advance of the type of information collected and how it will be used.

The Group strives to protect the data collected by complying with the highest standards and certifies that they will be communicated and accessible **only to those who are empowered and have a legitimate interest** in accessing the data.

To legitimately process personal data, the Beaumanoir Group has all necessary authorisations to access and process these data and will automatically destroy them at the end of their legal or professional purpose for which they have been collected.

Last, personal data collected by the Group will not be transferred to a country other than the one in which it has been collected for a purpose unrelated to its initial one, and systematically in compliance with local legal and regulatory provisions, in conditions that ensure its security and confidentiality.

A former co-worker that I used to manage just sent me an email asking whether we kept personal data about him, and if so, whether it is possible to destroy them. What can I reply to him?

› Yes, we keep different personal data on our former co-workers, such as their work contracts and their payslips, for a duration set by the law and legal requirements. These data are automatically destroyed once the retention period has been reached. The "Co-workers personal data protection policy" explains the different retention periods applicable.



One of my colleagues recently had an operation. I would like to send him a get-well card, but the company refuses to give me his address. What can I do?

› It is important to remember that everyone has a right to privacy and that this colleague does not necessarily want his address to be known and accessed by all. Talk to Human Resources who may eventually be able to pass on a note without divulging your colleague's address.

RESPECTING AVAILABLE RESOURCES

It is important to ensure a **good use of the resources** that the Beaumanoir Group makes available to its co-workers, which means to **respect** them and use them with care and responsibility. By "resources", we mean computer/electronic equipment (PC, screen, printer, phone, etc.), other equipment (desk, chair, etc.), contact/address lists, working time, company car, etc.

The misuse or degradation of our resources can not only damage the Group

financially and operationally, but also the co-workers themselves, as well as the environment.

Therefore, the company's resources should not be used for personal reasons, except for communication tools, which can be used in a very limited way, with respect to the Group's computing charter. If any doubt, co-workers can ask their line manager.

I have just received my co-worker discount card. Can my friends and family benefit from it?

- › *No, you cannot. This discount is only applicable to you – in addition, your card is nominative. Hence it is not allowed to use it for any other purchase than yours. However, during the Christmas and New Year period, a certain tolerance applies, and your family can benefit from it.*



I need to download a free software on my laptop, can I do it myself?

- › *Beware of the appearances. Downloading a corrupted or non-free software from the Internet for business purposes is a major risk. Indeed, the consequences for the Group can be serious. Therefore, any installation request must be made to the IT department, so that they will explain to you how to do it safely.*

BLOW THE WHISTLE

4

INTERNAL NOTIFICATION PROCEDURE

We must all respect these provisions and especially those pertaining to the **obligation to protect the integrity and offer respect to the values and ethical principles upheld** by the company. We must not only, first and foremost, respect the Charter, but we must also be its guardians.

Therefore, the company expects that all of us commits to:

- Take action when facing a situation that goes against the Charter.
- Notify the events that may have been witnessed.
However, one cannot be penalised for not having implemented this notification procedure.

Even though it is possible to raise an alert by contacting a line manager or the Human Resources department, the Beaumanoir Group has implemented an **internal alert** system that makes it possible to contact the "**Ethics Committee**":

- By email to the following address:
compliance@groupe-beaumanoir.com
- By post to: Groupe BEAUMANOIR (**Direction Ethique**) – 10 impasse du Grand Jardin – ZAC La Moinerie – 35418 SAINT- MALO, FRANCE.

The purpose of this whistleblowing system is to provide a secure resource that can be anonymous, to report confidentially and in good faith any situations that are contrary to the principles of the Ethics Charter.

It is open not only to Group employees but also to former employees, prospective employees, external and occasional employees, contractors and subcontractors.

This system is also available for all those who need help or advice regarding the

content of the Charter and the modalities for its implementation, and for those who did not get answers from their superior or from Human Resources.

Scope of the whistleblowing system

Reports made under the whistleblowing system bring to the attention of the Ethics Committee information concerning:

- facts relating to the existence of conduct or situations contrary to the Ethics Charter, in particular any fraud or attempted fraud or corruption, any breach of ethics or conflict of interest
 - a crime or an offence*
 - a threat or harm to the public interest*
 - more broadly, any alleged violation or attempt to conceal a violation of an international commitment, a unilateral act of an international organisation taken on the basis of such a commitment, of European Union law, of the law or regulations*

**In relation to the Beaumanoir Group's area of responsibility*

These may be facts that have occurred or are likely to occur.

Where the information was not obtained in the course of their professional activities, the whistleblower must have had personal knowledge of it.

The information provided must be factual and directly related to the subject of the alert.

Facts, information or documents, whatever their form or medium, covered by secrecy laws or regulations (national defence, judicial secrecy, medical secrecy, lawyer-client relations) are not admissible.

Reports must be made in good faith and

without direct financial consideration. The facts and information transmitted must be serious and not misleading.

Misuse of the system as a delaying tactic or for defamatory purposes exposes the perpetrator to disciplinary sanctions and legal proceedings.

Principle of confidentiality

People who wish to make a report are advised to identify themselves, as their identity will be treated confidentially. However, the report may be anonymous (for example, by using an email address that does not allow the author of the report to be identified).

The Group's whistleblowing procedure guarantees the strict confidentiality of the facts reported, as well as the personal data of the whistleblower, the person(s) implicated or concerned by the report and any third party mentioned in the report.

This confidentiality applies without prejudice to the possibility for the Beaumanoir Group to implement disciplinary and/or contentious procedures relating to the facts reported, as soon as the investigations carried out as part of the processing of the report allow the facts to be established.

Processing of reports

After receiving a notification, the Ethics Committee will be in charge of addressing the signal as soon as possible (maximum period of **48 hours** to take charge of it and one month to process it), with respect to **confidentiality, impartiality and presumption of innocence.**

The Ethics Committee is made up of:

- Group General Manager
- Group Delegate General Manager
- Group Delegate General Manager of support and service
- Group Director of Human Resources, Communication, CSR and Chief Compliance Officer
- Group Sourcing Director

- Group Financial and Administrative Director
- Group Legal Director
- Group Sustainable Sourcing Director
- Labour Lawyer

It is recalled that the Ethics Committee is subject to a strict obligation of confidentiality.

Once the report has been received, the Ethics Committee will **examine its admissibility.** To this end, the author of the report may be asked to provide additional information.

If the report is declared inadmissible, the file is closed as inadmissible and the information collected is immediately destroyed/archived.

If the report is admissible, an internal investigation will be carried out to verify the validity of the facts.

During this **investigation phase**, the Ethics Committee orders and carries out all necessary investigations to examine the merits of the Report. Where appropriate, it may entrust the investigations to the Group department best placed to identify, characterise and deal with the facts reported.

The persons concerned by the report will be informed that accusations have been made against them and will be given the opportunity to be heard. However, it may not be instantaneous if the investigation team needs to analyse the veracity of some elements, protect evidence, or notify the relevant authorities.

Besides, during the investigation, each interrogated person must be honest, cooperative and communicate all information and documents she/he has when requested.

In order to guarantee the confidentiality of the investigation, confidential data

(identity of the whistleblower, alleged facts, persons concerned and any other information resulting from the investigation) will only be communicated to legitimate persons who are authorised and empowered to process whistleblower reports as part of the investigation, so that they can follow up on them and take informed decisions following their conclusion (transmission to the judicial or administrative authorities, disciplinary sanctions, filing without further action).

Once the investigation is done, the team in charge of the investigations will give a report to the Ethics Committee, which will then rule over the decisions to make to end to problem, sanction the events and prevent any risks.

The author of the report will be informed of the outcome of the processing of the report within a reasonable period following the end of the investigation and the implementation of any resulting disciplinary or other measures.

Protection of the whistleblower

It should be noted that no person acting in "**good faith**" and receiving no direct financial compensation will or may be otherwise be sanctioned or suffer reprisals for having made a report in accordance with the whistleblowing procedure.

Someone of good faith is someone who, when using this procedure, provided complete and honest information, even if after the investigation it turns out to be erroneous.

Anyone who believes being retaliated against after raising an alert (dismissal, harassment, demotion, intimidation, reputational damage, or any other sanction / discrimination) must immediately notify the committee following this procedure, because he/she can benefit from a **legal protection** if the

procedure is complied with (French law n°2016-1691 of 9 December 2016 as amended by Law 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers).

This protection also applies to:

- facilitators, defined as any natural person or any legal entity under private law with a non-profit purpose who helps a whistleblower to make a Report or disclosure in compliance with the law;
- individuals connected to the whistleblower who are at risk of reprisals in the course of their professional activities by their employer, their client or the recipient of their services;
- legal entities controlled by a whistleblower, for which he or she works or with which he or she has a professional relationship

Personal data

The whistleblowing system complies with regulations on the protection of personal data.

Personal data collected as part of the system is processed only by duly authorised persons specifically responsible for managing the system.

In addition, the Group undertakes to collect and use only personal data that is appropriate, relevant and limited to what is necessary for the purposes for which it is processed in the context of the report.

Reports are only kept for the time strictly necessary and proportionate to their processing and the protection of their authors, the persons they concern and the third parties they mention, taking into account the time required for any further investigations. However, data relating to reports may be kept beyond this period, provided that the individuals concerned are neither identified nor identifiable.

OTHER NOTIFICATION CHANNELS

Even though making an internal notification is encouraged in the first place, other whistleblowing channels can be used to report a fact (French law n°2016-1691 of 9 December 2016 as amended by Law 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers).

First, it is also possible to make an **external notification** to justice, competent national authorities, or the French "Défenseur des droits".

Besides, the "Défenseur des droits" can guide whistleblowers to the appropriate body to receive their report and can support them in their procedure. A practical guide for whistleblowers can be consulted on the Défenseur des droits website to inform those who wish to make a report about their rights and obligations in this area.

Whistleblowers may also choose the **hierarchical route** by reporting their concerns to their direct or indirect superior. The latter's role will then be to advise and guide the whistleblower towards the procedure best suited to their situation.

Last, a **public disclosure** (by any means: press, blog, social networks, etc.) is possible only in some situations:

- Either after having made an external report (preceded or not by an internal report) and that no "appropriate" action has been taken within 6 months of the acknowledgement of receipt of the report or, failing acknowledgement of receipt, 6 months from a period of 7 working days following the report,
- Or if an external report exposes the whistleblower to reprisals or is certain to be ineffective, in particular if evidence can be concealed or destroyed or if the person reporting has serious grounds to believe that the authority may be in a conflict of interest, in collusion with the perpetrator or implicated in the facts,
- Or in the event of imminent or evident danger to the public interest, in particular where there is an emergency situation or a risk of irreversible harm.

When it is likely to harm the interests of national defence and security, public disclosure is only possible in the first case (lack of appropriate response from the external authority).

These conditions are necessary if the whistleblower wants to benefit from a legal protection as per French Law.



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