

2025-2026 URGO GROUP ETHICAL CHARTER

To continue to grow within the respect of the law and the rights of all, and to protect us from individual and collective risks, we have been reinforcing our approach to environmental and social governance.

The Ethical Charter grounds Compliance within the URGO Group, in line with legal requirements, and in particular those of the French Sapin II Anti-Corruption law applicable to the entire Group.

Because acting ethically also means protecting our future.



ENSURING RESPECT FOR PEOPLE

- . To protect people.
- . To ensure people’s dignity.
- . To embrace diversity.

COMMITTING TO HEALTH AND THE ENVIRONMENT

- . To respect public health by guaranteeing the safety and well-being of our employees, patients and customers.
- . To develop and market products that help preserve the environment.



GUARANTEEING INTEGRITY

- . To prohibit corruption in all its forms.
- . To avoid our personal interests influencing our professional decisions.

BUILDING STRONG RELATIONSHIPS

- . To apply high ethical standards.
- . To promote fair and loyal trade.
- . To select and to treat fairly our suppliers/service providers/distributors.



PREPARING THE GROUP’S FUTURE

- . To lead our actions and messages according corporate values.
- . To protect sensitive information, about the Group and its partners.
- . To enhance our rights and respect the rights of third parties.

ETHICAL CHARTER



URGO
INVENT & CARE

SOMMAIRE

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A WORD FROM THE CHAIRMAN, TRISTAN LE LOUS

Our Group is expanding, driven by our traditional businesses and by our new growth drivers. We recently passed the bar of 3,600 employees in 20 countries. We are diversifying our business, communicating more, seeing our interactions multiplied both within the company and outside.

So that we can continue to grow whilst remaining within the law and safeguarding everyone's rights, and protect us from individual and collective risks, we reinforce our approach to social and environmental responsibility.

The Ethical Charter is the common foundation for Compliance within the URGO Group.

Making sure your rights are safeguarded whilst also safeguarding those of your colleagues and others seems like a simple enough principle, but in fact it means all kinds of things!

In the face of issues like ensuring respect for people and privacy or preventing conflicts of interest, the answers are sometimes complex to find and implement. This Charter is designed to provide answers to these questions, This Charter is a concrete reference point that each of you can turn to, whatever position you hold. To help you to decide what attitude to adopt in your day-to-day relations within the Group, but also outside it with our partners, suppliers and customers. Beyond this need to comply with a set of ethical standards, **we want to continue to encourage initiative, mutual respect and the quest for excellence.** We will have succeeded in our growth if we remain driven by the values and strong identity that characterise us.

To continue our mission, Invent & Care, to change our patients' lives, while respecting others and the law.



MARIE-CATHERINE SARCIAUX

A WORD FROM THE GLOBAL COMPLIANCE OFFICER

Ethic, Environment,
Quality and Regulatory

EVERYDAY ETHICS

The aim of this Ethical Charter is to help us understand what is expected of us in our working environment as employees of the URGO Group, by setting out the basis principles and providing some tangible examples. These principles are not optional: we all have to comply with them. Ethics is a daily practice and this charter applies to everyone, both internally and in relation to their professional partners.

These ethical issues are rarely straightforward. If you are unsure, you should talk to your line manager, human resources department or Compliance Officer.

Indeed, the role of the Global Compliance Department is to **raise your awareness of compliance with professional ethics:**

- By advising you when you need it,
- By creating tools, such as this Ethical Charter,
- By offering you training on URGO Group policies and procedures.

My responsibilities also include:

- **Identifying and preventing the risks associated with non-compliance (such as committing an offence, disputes, sanctions or reputational risk)** by establishing procedures, helping employees to implement them and monitoring compliance with them.
- **Ensuring the smooth running of the whistleblowing mechanism** described in this charter.

You are welcome to contact the Global Compliance Department if:

- You have concerns about certain practices and need help or advice to resolve them.
- You have a doubt about the legality or compliance of a particular behaviour.
- You need advice on how to apply a procedure or policy.
- You have suggestions for improving our policies and procedures.
- You want to report an abnormal situation or behaviour, or a breach of this Charter.

How to contact the Global Compliance Department:

- For whistleblowing/for report:
alerte.compliance@group.urgo.com

IMPLEMENTATION CONDITIONS

Ethical rules to be respected by ALL

DEFINITIONS

All meaning all persons

All the companies of the URGO Group that is all the companies of the URGO Group, regardless of their legal form (subsidiaries or representative offices), their activities (R&D, manufacturing, promotion, etc.) or the country in which they are located.

All collaborators working for any of the Group entities, whatever their contract (service providers, temporary workers, trainees, consultants, etc).

APPLICABILITY

This version of the Ethical Charter applies to all the URGO Group collaborators and comes into effect in October 2023 and replaces the previous version.

This charter must be considered as part of the internal regulations when applicable. The charter will be regularly updated to take into consideration the legal, regulatory, economic and organisational changes, as well as the standards of integrity applicable to our company.

LOCAL LAWS, REGULATIONS, POLITICS AND LOCAL REQUIREMENTS

This Ethical Charter does not replace local regulations which remain applicable.

In the event of a contradiction between the charter, local laws and regulations, the URGO Group will strive to uphold the highest standard of integrity.

The internal rules of URGO Group companies may provide for stricter rules than the charter ones. However local requirements may not provide for less strict rules.

DISCIPLINARY MEASURES

Any non compliance with the Ethical Charter may result in disciplinary action as provided for in the internal regulations of the companies in the URGO Group when this regulations exist or by the applicable labour laws regulations.

ENSURING RESPECT FOR PEOPLE'S PROTECTION

PROMOTING DIGNITY AND EMBRACING DIVERSITY

URGO, as a business with an international dimension, promotes diversity within organisation and views the differences between its employees and commercial partners as a valuable asset that is essential to its success.



DO:

- **Be respectful of others** by treating staff, work colleagues and commercial partners as you would like them to treat you.
- **Promote equality of opportunity** for all employees and candidates during the recruitment process.
- Offer our employees **ethical working conditions**.
- Allow our employees to assess their performance objectively and develop their skills.
- **Prohibit all form of discrimination** during the recruitment process and throughout the working relationship, particularly in relation to:
 - gender,
 - age,
 - origin,
 - religion,
 - sexual orientation,
 - physical appearance,
 - state of health,
 - disability,
 - trade-union membership, etc.

DON'T:

- **Behave in ways that could undermine the individual's dignity**, particularly with regard to harassment of any kind and for any purpose (for example, sexual favours may not be exchanged for recruitment or promotion).
- **Express inappropriate views**, in particular with regard to race, colour, ethnicity, beliefs, religion, sex, sexual orientation, pregnancy, etc.
- **Keep silent if you feel you have been a victim** of harassment or if you have witnessed it: it must be reported to our line management, Human Resources department or Compliance Officer. Harassment can be reported using the whistleblowing procedure, by writing to the Compliance Officer at: alerte.compliance@group.urgo.com.

IN PRACTICE

One of my colleagues tells racist jokes that make me feel uncomfortable. What should I do?

Your colleague needs to be made aware that their jokes are creating a negative working environment. You are encouraged to do it yourself if you feel able to. Whether or not you communicate directly with your colleague, you must report it to your line management, who must take appropriate action. You can also contact Human Resources or the Compliance Officer.

What is sexual harassment? Is it necessarily committed by someone in a more senior position?

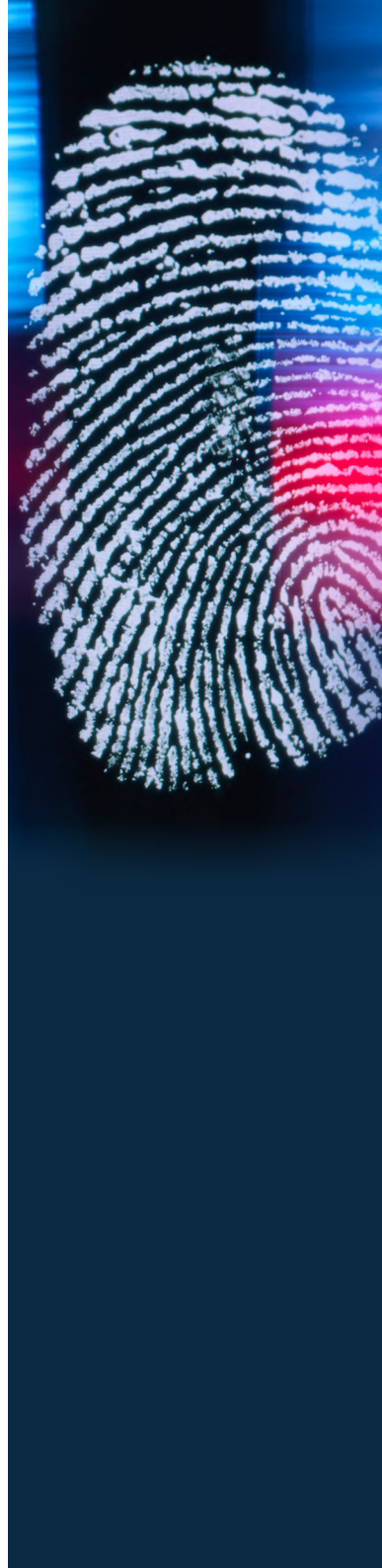
Sexual harassment consists of repeated comments and behaviour with a sexual connotation, that undermine someone's dignity because of their degrading or humiliating nature or which create an intimidating, hostile or offensive environment. It may also involve severe pressure, even if not repeated, to force someone to perform a sexual act for the benefit of the individual concerned or a third party. The perpetrator of sexual harassment may be a manager or any colleague, or even a customer. The victim can be a man or a woman. Even if your national legislation does not condemn this type of behaviour, it is strictly prohibited within the Group, along with all other forms of harassment.

ENSURING RESPECT FOR PEOPLE'S PROTECTION

RESPECT FOR PRIVACY

Protecting personal data

Personal data are items of information that allow an individual to be identified, either directly or indirectly, such as the name, date of birth, social security number, photograph, e-mail address, computer user name, etc. The person concerned must agree before these data can be passed on.



DO:

- **Guarantee the confidentiality** of personal data belonging to:
 - Our colleagues and employees,
 - patients,
 - customers,
 - doctors,
 - and anyone else involved in our activities.
- **Inform** those concerned that we are collecting and processing their personal data so that they can exercise their rights.
- Collect and process **personal data solely for specific and legitimate business** purposes.
- Ensure that the **personal data is kept securely**.

DON'T:

- **Share personal data** to which you have access in the course of your duties with third parties, without authorisation from the person concerned and/or your line management.
- **Collect more data** than is necessary for their intended use.
- **Retain personal data** for longer than is necessary for their intended use.

IN PRACTICE

A friend who doesn't work for a Group company asks me for my colleagues' email addresses for a work-related purpose. Can I send them the list?

Protecting personal data is a legal obligation that applies to everyone. You must get agreement from the people concerned before you pass on their personal data.

I'd like to send one of my colleagues a surprise birthday present to their home. I asked Human Resources to give me their personal address, but they refused on the basis that they would need my colleague's agreement. Isn't that a bit over the top?

The Human Resources department's attitude is completely appropriate: employees' personal data must remain strictly confidential. Human Resources cannot make any exceptions.

I need to transfer some consumers' personal data to a communications agency in another country. Can I do this?

The best advice is to contact the legal department first: the laws vary widely from one country to another. Moreover, we mustn't transfer personal data to third parties unless we have checked that they have signed a commitment to comply with our standards with regard to protecting personal data.

COMMITTING TO HEALTH AND THE ENVIRONMENT

RESPECT FOR PUBLIC HEALTH

The URGO Group is committed to guaranteeing the safety and well-being of our employees, patients and customers



DO:

- **Market products** that comply with all national and international regulations and all standards in effect.
- **Check the safety and quality of our products** continuously at every stage of production, distribution or marketing.
- Ensure that our commercial partners apply the same safety and quality standards.
- **Report all product questions or complaints** of which we are aware to the relevant authorities, regardless of how serious they may be.
- **Guarantee the safety** and protect the rights of people who take part in our clinical trials or consumer tests.

DON'T:

- **Disseminate product information** that is not accurate, objective, justified or compliant with scientific data and the applicable legislation.
- Make misleading use of our research **to influence health professionals** and others.

IN PRACTICE

A friend who uses an URGU Group product, complains of side effects he thinks are related to the product. Should I inform someone in the Group?

Yes, straightaway. However you become aware of a problem in general or an unknown side effect linked to a Group product, you must immediately inform your line management who will relay the information, or contact the relevant department directly.

We've received a report from a supplier telling us that some raw materials he recently delivered may be contaminated. The products containing these raw materials have already been delivered to our customer and no concrete evidence of contamination in our products has been reported. Are we obliged to recall the whole batch?

We must never ignore any information that could cast doubt on the quality or safety of our products. You must inform your line management or a Quality Manager immediately.

COMMITTING TO HEALTH AND THE ENVIRONMENT

HELPING TO PRESERVE THE ENVIRONMENT

To develop and market products that help preserve the environment (life cycle assessment, eco-design, packaging reduction, lower energy consumption...)



DO:

- **Take every precaution** to maintain a clean and high-quality workplace.
- **Protect the health and safety of employees** and any other person involved with the URGO Group.
- Immediately **report** to the Safety Manager of your site, or to your management, **any incidents**, however minor, and any behaviours, systems or situations that could compromise the safety of your work environment.
- Use natural resources reasonably and **minimise the environmental impact** of our activities and products, throughout their life cycle.
- **Immediately report** any situations that could be hazardous for health, safety, or the environment to your management.

DON'T:

- **Impose on employees** or colleagues situations that could be detrimental to their health and safety, for example, a task presenting a potential risk for which the employee has not received appropriate training.
- **Take reckless risks** in the performance of our duties, by going into areas for which we lack appropriate authorisation, or by behaving improperly when driving (speeding, alcohol, etc.) the URGO Group does not tolerate any negligence whatsoever with respect to driving rules.

IN PRACTICE

The pollution control system of one of the essential components of our manufacturing system is defective. I've just learned that it will take three days to receive the spare parts and repair it. Can we really afford to stop production, when our order book is full?

Our commitment to good environmental practice is important. This machine should not run without the required pollution control system. You must inform your management and work together to find a solution.

My production manager asked me to deactivate a safety system that slows down the production line. What should I do?

You should never deactivate, disconnect or neutralise a safety system or control equipment. If your production manager insists, you must refuse and inform the top management of the site and your Human Resources department. Safety is an absolute imperative that must never be compromised by scheduling constraints or any other reason.

GUARANTEEING INTEGRITY

FIGHTING CORRUPTION AND INFLUENCE PEDDLING

Fighting corruption in all its forms

Active corruption is defined by the proposal or promise of an undue advantage (such as a payment, gift, service, authorisation, valuable item, etc).

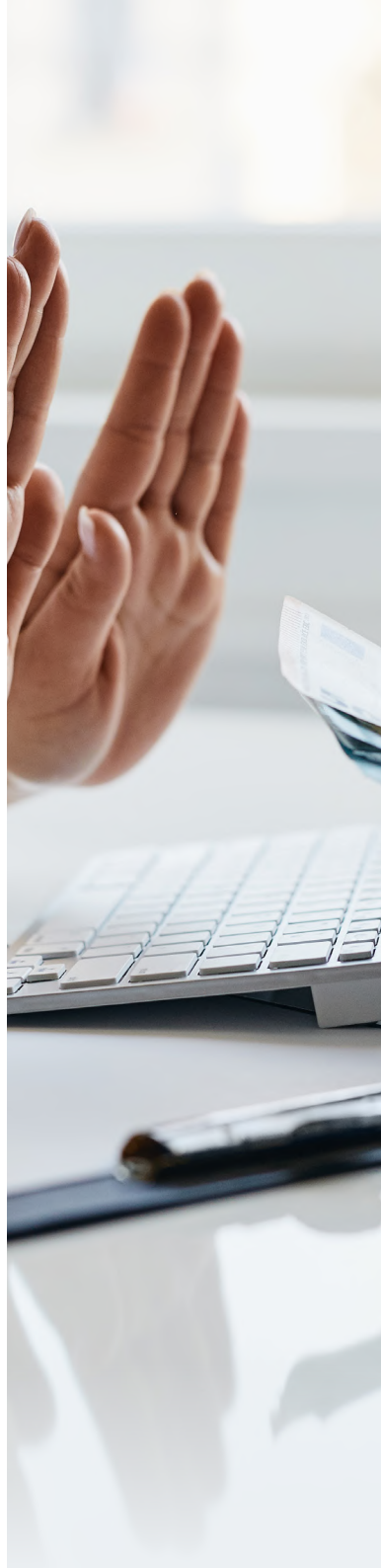
The passive corruption is defined by the solicitation or acceptance of offers or promises of money, gifts, services and advantages.

Influence peddling is defined when a person accepts or requests an improper advantage for the purpose of abusing their real or supposed influence to obtain a favourable decision.

The URG0 Group does not tolerate any form of corruption or influence peddling, whether private or public, active or passive, direct or indirect.

The URG0 Group demands of his collaborators to refrain from proposing, providing, offering or receiving any undue advantage leading to be influenced by the public/private (representative of a public authority or in charge of a public mission or any person part of an elective office) aiming at getting a benefit of any kind.

Please refer to the URG0 Group corruption prevention guide.



DO:

- **Remunerate** our agents, business consultants or intermediaries for their technical expertise, for services actually provided and in compliance with contractual clauses and applicable regulations.
- **Inform your management** of any solicitation or offer of personal benefits to which you are subject.
- **Inform your management of any request for payment** that is outside the scope of the contract or usual practice.
- **Refer to the Guidelines** for Preventing Corruption and to specific policies (gifts, hospitality, travel) and/or to your line manager, human resources department or Global Compliance Officer if you are doubtful of a particular situation or behavior
- **Respect the Guidelines** for Preventing Corruption for our company.

DON'T:

- **Offer or give** a public official or private person (generally a customer), gifts, presents or benefits so that they act (or refrain from acting) in a particular way associated with their position, except for the usual courtesies or hospitality or gifts of limited value (in accordance with your company policy).
- **Agree to receive**, directly or indirectly:
 - a payment, gift, loan, entertainment or benefit
 - from anyone engaged in a business relationship with URGO,

EXCEPT FOR:

- the usual courtesies or hospitality, business meals or other gestures in accordance with standard practice in the country or profession,
- gifts of limited value, if this is standard practice in the country concerned.

IN PRACTICE

My Company cannot offer a gift to a public official. But can I offer a gift to an official to thank them for their assistance in winning a contract on a personal basis, if I pay for it myself?

Any gift of more than symbolic value would be viewed as a bribe, which is prohibited by all international regulations, whether it is offered by your Company or yourself. By doing so, you would be putting both the Company and yourself at risk, as not only the Company but also the person who committed the illegal act who would be punished.

A supplier has just given me a large bag of products. I know it didn't cost them much. Can I accept it?

You should thank the supplier for their generosity, but politely refuse the gift. You can only accept gifts or invitations on condition that they are of symbolic value only: for example, products that display your supplier's logo or a box of chocolates are, in principle, acceptable.

GUARANTEEING INTEGRITY

PREVENTING CONFLICTS OF INTEREST

To avoid our personal interests unduly influencing our professional decisions

To complete, it is necessary to read the URG0 Group Guidelines to preventing corruption.



DO:

- **Be vigilant** about situations in which the objectivity of your professional decisions could be affected by your personal interests or those of our family and friends.
- **Refrain from taking part in or exerting any influence** over any decision that might put our personal interests (or the interests of our family and friends) in conflict with URGO's interests.
- **Inform your line management:**
 - of any investment or professional activity with a competitor or supplier, carried out by you or a family member or friend,
 - of any links that may exist between your relatives or friends and the Group's activities.
- **Systematically check with your line management,** legal department or Compliance Officer if you are unsure whether or not a conflict of interest exists.

DON'T:

- **Accept a gift** or any other benefit that would give us the impression of being in someone's debt and could cause us to question the objectivity of our decisions. However, in some countries, refusing a gift from a business partner could be taken amiss in cultural terms, or even harmful to future business relationships. In this case, you should refer to your Company's local policy.
- **Offer anything** other than a symbolic gift or benefit to people who work with or wish to work with the Group. Indeed, such an action may give the beneficiary the feeling of being indebted and consequently, lead them to question the objectivity of their decisions.
- **Use your position within URGO** to secure advantages for yourself, your family members or friends. For example, a plane ticket should be chosen solely on the basis of the price and discounts available to the Company, not the air miles you might earn personally. In addition, using euro discounts credited to the Company for private travel is strictly prohibited. Such behaviour constitutes a criminal offence.

IN PRACTICE

I was really impressed by the quality of work provided by one of URGO's suppliers. I am therefore considering investing in this company. Is there a risk of a conflict of interests?

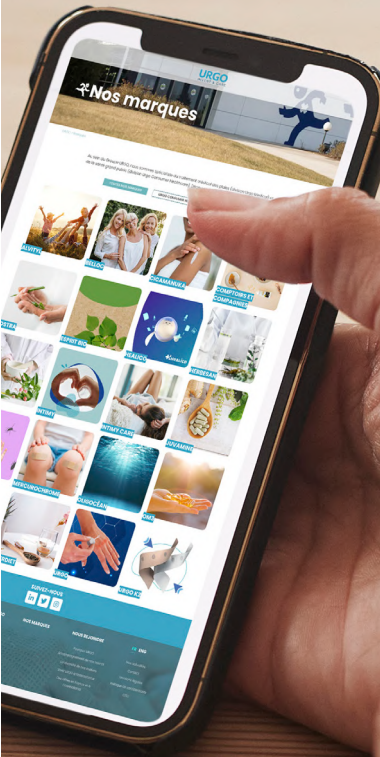
Even if your involvement were only financial, there could be a conflict of interest, depending on your position within your Company, your influence on purchasing decisions, the amount of your investment and how important a customer your Company is for the company concerned. The only way to know if this is acceptable or not is to inform your line management first and discuss the matter openly.

My spouse is the owner of a supplier that my Company plans to use. I don't have any decision making responsibility in this area. Should I mention it?

Yes. Any potential conflict, or even an apparent conflict, can harm your reputation or your Company's reputation and must be reported to your line management so that the best solution can be found.

BUILDING STRONG RELATIONSHIPS

To apply high ethical standards in our activities and marketing messages



DO:

- Ensure that the **information** you provide is accurate, **objective, reliable and complete**.
- **Avoid creating confusion** with our competitors' products when you communicate about and promote our products.
- **Provide reliable scientific evidence** to support our claims.
- **Design our sales promotions** and direct marketing campaigns so that our customers can easily understand the conditions of the offer.
- **Comply with our statutory obligations** and those relating to transparency and providing samples or other benefits when dealing with health professionals.

DON'T:

- **Denigrate our competitors** in your communications.
- **Use misleading or dishonest advertising.**
- **Seek to exploit consumers' credulity**, lack of knowledge or lack of experience.
- **Use promotional materials** that have not been properly checked, approved and authorised (by your entity's legal and regulatory affairs departments or by an external adviser, and by the health authorities, where applicable).

IN PRACTICE

I'd like to include in an advertisement the fact that a product does not contain methyl-isothiazolinone (a cosmetic preservative that can cause allergies). One of my colleagues tells me that I shouldn't use this argument as the use of this ingredient is prohibited by law in no-rinse products. But I think it's quite a powerful message to give to the consumer. Who is right?

Your colleague is right. We can't suggest that our products have a particular characteristic if it's simply due to compliance with the law. That would be misleading for our consumers. You should contact the legal and regulatory affairs departments to have your promotional messages validated.

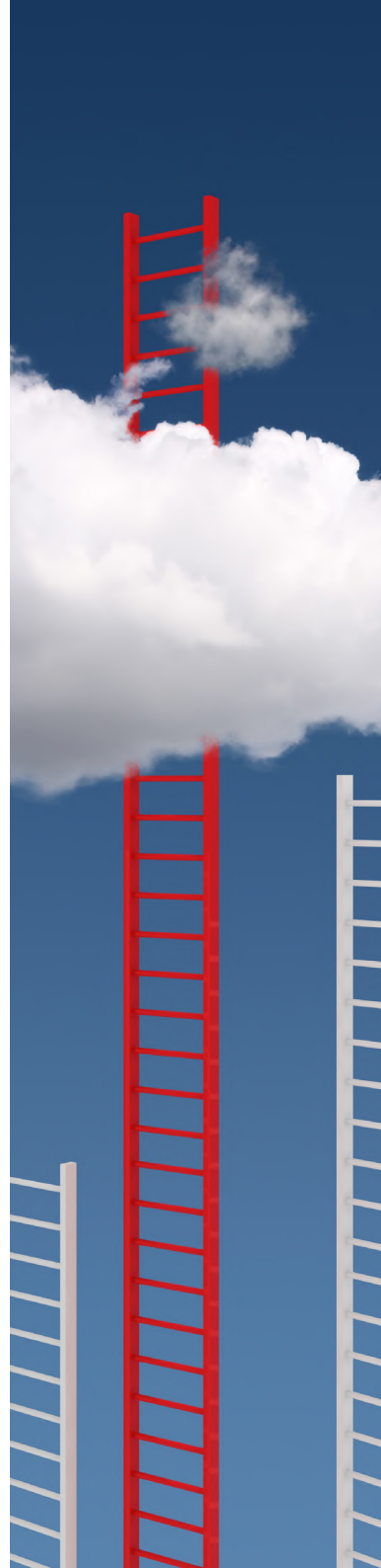
I'm convinced that one of our products is significantly better than one of our competitor's product. I'd like to highlight this argument in one of our communications. Can I do this?

Comparative advertising is not prohibited in itself. However, it's important to ensure that the comparison doesn't result in a message that's misleading or dishonest. Moreover, you mustn't denigrate a competitor or his products when you are promoting URGO products. You must have your advertising approved by your legal department before you publish it.

BUILDING STRONG RELATIONSHIPS

RESPECT FOR FREE COMPETITION

Promoting fair and lawful trade



DO:

- **Act in accordance with free, fair and open competition.**
- **Act in accordance with standards on anti-competitive practices** established by the European Union or by other countries in which we operate.

DON'T:

- **Discuss with our competitors** issues relating to:
 - prices and financial information,
 - projects and marketing strategies,
 - market share,
 - our intention to respond to an invitation to tender, or not,
 - existing agreements or contracts with suppliers or customers.
- **Take part in meetings**, even within trade associations, where such matters are likely to be discussed.

IN PRACTICE

During the coffee break at a trade association meeting where I represent my Company, a competitor tells me that their laboratory is preparing to launch a revolutionary new product. Can I talk to him about it to get information that might interest my line management?

Such a discussion could be classed as an unlawful exchange of confidential information and could result in heavy penalties for your Company. You must therefore, politely but firmly, end the conversation. When you get back to work, you must report the incident to your line management who will pass it on, or directly to the Compliance Officer. In general terms, it is advisable -as far as possible- to avoid informal contact with our competitors during forums, seminars, or any other type of meeting, to prevent the possibility of discussing subjects that are likely to breach the applicable anti-trust laws. If, however, one or more competitors should raise such a matter, we should make it clear that we do not feel comfortable continuing the conversation, be ready to express our disagreement with the subject of the discussion and put an end to it.

I've been told that a call for tenders is about to be launched and that my Company intends to participate. An employee at one of our distributors, with whom I'm routinely in contact, called to tell me that their company was also going to submit a bid. Can we discuss it?

Even if it's your usual distributor, in this call for tenders, it's a competitor, since it intends to sell the same products as you, to the same person. As a result, you mustn't discuss the invitation to tender with him under any circumstances, as your conversation could be viewed as an anti-competitive agreement.

BUILDING STRONG RELATIONSHIPS

RELATIONSHIPS WITH BUSINESS PARTNERS

Selecting and treating our
suppliers/service
providers/distributors fairly



DO:

- **Purchase goods and services** solely on the basis of the quality, safety, price and value they offer.
- **Select our partners** on the basis of objective criteria, using transparent procedures.
- **Find out about our future partners** and apply the procedures in force in our Company when selecting our suppliers, service providers or distributors.
- **Ensure that the third parties** we work with comply with legislation, **adopt ethical commercial practices** and meet our standard requirements in terms of labour, health and environmental protection.
- **Respect the sales conditions** of our suppliers or service providers, or the conditions we have negotiated, particularly in relation to payment terms.

DON'T:

- **Continue to work with a partner who** repeatedly or deliberately **fails to comply with our standards**, particularly in respect of human and children's rights, protecting health and safety, combating corruption, etc.

IN PRACTICE

Someone has told me, in confidence, that our supplier abroad is currently under investigation for forced labour. The said supplier has told me absolutely nothing at all and we didn't notice anything unusual during our previous visits to his premises. What should I do?

First of all, you must inform your line management. Secondly, you need to ask the supplier for information and an explanation. If you still have doubts after your supplier's explanations, you should consider carrying out an audit of this supplier to check whether the URGU Group can continue to work with them.

I have just received a price proposal from a potential supplier that's very interesting: the products look as though they're of good quality, and at an attractive price. However, they haven't responded to any of my requests for documents and information about their business or the working conditions in their factories. Can I do business with him?

Financial aspect is not the only criterion that dictates our choice of supplier. Our partners must also meet our quality criteria and our specifications, particularly in environmental and labour terms. If your potential supplier is not responding to your requests and there's a lack of transparency, there is a significant risk that ethical practices are not a major concern for them. You should let them know that the documents and information you have requested are essential for establishing a commercial relationship. If you still don't get an answer, you should ask your line management for advice on the most appropriate way of dealing with the problem.

PREPARING THE GROUP AND COMPANIES' FUTURE

CONFIDENTIALITY OF SENSITIVE DATA

Protecting sensitive information about the URGO Group and its partners

Any information that has not been made public must be protected, even in the absence of a formal confidentiality obligation, whether the information relates to the Group, its employees or third parties. The URGO Group's competitive advantage relies on sensitive scientific, technical or commercial information. This information is highly valuable for our group and disclosing it unexpectedly or accidentally can not only affect the URGO Group's competitiveness but also be a source of malicious actions or unfair competition.



DO:

- **Protect the confidentiality** and integrity of critical information of any kind, regardless of the medium used or where it is stored, and whether it relates to URGO Group or its partners.
- **Sign confidentiality agreements** before passing on confidential information to anyone outside the URGO Group.
- Take all possible measures **to protect sensitive and confidential information**, in particular from the risks of hacking or introducing viruses.
- **Be vigilant when having conversations** or using your smartphone and computer in public places.
- **Comply with the IT security rules** set out in particular in the Company or URGO Group IT guidelines.
- **Limit the communication** of confidential information to only those who need to know it (watch out for email trails).

DON'T:

- **Use software** or peripherals not supplied by the Company to communicate, store or work on sensitive information.
- **Disclose** non-public information about URGO Group to people outside the Group without a confidentiality agreement or prior authorisation from line management. We must be particularly careful, for example, when responding to requests from journalists.
- **Use confidential financial or other information**, for purposes other than the performance of your duties, failing which you could be found guilty of insider trading.

IN PRACTICE

What is confidential information ?

It might, for example, be information relating to financial results, planned acquisitions, important results of clinical trials, the granting of an operating licence for a new product, losing or winning a major contract, or any current legal proceedings or disputes.

At a meeting, someone I don't know introduced himself to me as the marketing manager for an agency that had been selected for a campaign on one of our products. Can I pass on information that is still confidential, such as the unpublished results of a new study on this product?

You should first check whether this person or their company has signed a confidentiality agreement with us or a contract containing a confidentiality and non-disclosure clause. Otherwise, neither this person nor their company can have access to sensitive and confidential information about one of our products. You must also obtain prior authorisation from your line management, as to the list of information you can communicate.

I've found out from one of my colleagues that a Group Company is about to sign a large contract with a new supplier. This supplier is a listed company and I own shares in it. I think this contract will have a significant impact on its share price. Based on this information, do I have the right to buy or sell shares in this new supplier?

No, you don't have the right to do anything whatsoever with this confidential information, even if it could be useful to you. When we become aware of non-public information, we are viewed as "insiders". Using this information to buy, sell or trade shares on the stock market would be classed as "insider dealing", which is a criminal offence.

PREPARING THE GROUP AND COMPANIES' FUTURE

PROTECTING THE BUSINESS'S IMAGE

To lead our actions and messages according corporate values

Only duly authorised employees are permitted to communicate on behalf of the URGO Group about its activities or products.

Moreover, while URGO respects the political convictions and personal commitments of its employees, they must only be expressed in a personal context, i.e. outside working hours and at employees' own expense.



DO:

- **Choose what you say** and how you say it carefully when communicating.
- Always **be aware that any information posted on the internet can be accessed by anyone**, anywhere and for an indefinite period.
- **Remember that you can be held liable** for the content of what you publish on the internet.
- **Report undesirable events** or content found on the internet or social media to the appropriate department.

DON'T:

- **Commit the URGO Group** or one of its entities, either morally or financially, to providing any kind of support whatsoever, unless you are authorised to do so.
- **Use URGO Group headed paper**, funds, premises, equipment or resources for your personal political activities or for political events.
- **Publicly denigrate the URGO Group**, even after leaving it.
- **Make negative comments** about official statements by the URGO Group or the Group's partners or the views held by other URGO Group employees.
- **Act or appear to act** as a representative of the URGO Group in your personal political or community activities.
- **Refer to your association with the URGO Group** in your political activities.

IN PRACTICE

A friend of mine used an URGO Group products with very good results. I'd like to blog about it. Do I have the right?

The URGO Group respects the right of employees to use personal communication channels, such as blogs. However, communications relating to our products are regulated and may require authorisation from the health authorities and, at the very least, to be checked by the URGO Group's regulatory affairs and/or legal departments. You should refrain from blogging about your friend's results, as this could be seen as an illegal promotional campaign.

Can I post some really funny photographs of some of my colleagues, taken at the end-of-year party organised by the Company, on my blog?

You must not only get prior agreement from people concerned but also check that the photos could not present a degrading image of you, your colleagues or your Company.

PREPARING THE GROUP AND COMPANIES' FUTURE

PROTECTION OF INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS

To enhance our rights and respect the rights
of third parties



DO:

- **Protect and create value from our creations**, inventions and discoveries by working with the appropriate department to register a patent, trademark or other rights, allowing the business to retain exclusive rights to its intellectual property.
- Contact the legal department to **check the existence and validity of our intellectual property rights** in new countries where we intend to operate, as legislation in this area differs from one country to another.
- **Report** to your line management or the legal department **any fraudulent or inappropriate use** of any of our intellectual property rights of which you are aware.

DON'T:

- **Market new products** in new countries, create new product names, or use new marketing messages or promotional tools without getting approval from the legal department or an external adviser with regard to third-party rights.
- **Use or install software** not previously approved by the IT department, or for which we have not obtained a user licence.

IN PRACTICE

Why are intellectual property rights essential for URGO Group?

The URGO Group is recognised as a Group that is constantly innovating. Our patents, trademarks, domain names, etc. help us to protect and create value from our innovations. They are valuable assets for our companies and the business.

I work in the department that deals with promotional items. At a trade fair, I saw a rather original style of pen that would be good for the next campaign I'm working on. My manager liked the photo but thought it was too expensive. Can I have it made by one of our current subcontractors, who will probably give me a much better price?

The product you are interested in may be protected by its creator and reproducing it would therefore infringe their rights. Having this article manufactured could be qualified as counterfeiting and result in legal action being taken against us. You should consult your legal department.

WHISTLE-BLOWING MECHANISM

Making ethics a day-to-day concern

The URG0 Group conducts its activities with honesty and integrity and encourages all its Collaborators to respect high ethical norms.

If any person is aware or has any reason to think that a non-respect of a law/regulation of the Ethic chart, of the corruption prevention guide or any compliance guidelines applicable to the URG0 Group is about to occur, this person is highly encouraged to inform the Human Resources Department and may request help from the Global compliance Management.

The collaborators may also use the procedure for reporting ethics alerts and/or contact the alert website of the URG0 Group: alerte.compliance@group.urgo.com.

Any collaborator who discloses or reports in good faith and without direct financial consideration, a fact falling within the scope of the whistleblowing procedure and of which they have become aware, is considered to be a whistleblower.

Alerts will be handled in accordance with the reporting alert procedure in force in the country where the collaborator is located.

The URG0 Group is committed to protecting whistleblowers from reprisals, in compliance with the regulations applicable to them. The identity of the whistleblower will remain confidential as well as the information communicated.



DO:

- **Comply with national and international laws and regulations** and the principles set out in this Ethical Charter.
- **Report** to your line manager or Compliance Officer **any behaviour that strikes us as unusual** or potentially wrongful, i.e. any conduct that breaches the principles of the Ethical Charter, internal policies and/or applicable external laws and regulations, including reprisals against a person who has blown the whistle.

DON'T:

- **Hesitate to contact the Global Compliance Officer** if you have any doubts or suspicions about a behaviour you witness or a situation you have encountered.
- **Fear sanctions or reprisals** if we blow the whistle: you will be protected provided you have acted in good faith, if you are aware of the facts reported and are acting in the absence of direct financial compensation.

IN PRACTICE

Am I acting in URGO's interests by reporting behaviour that strikes me as abnormal or contrary to the Ethical Charter?

Yes. Group management must be aware of integrity problems so that it can deal with quickly. By reporting them, you are doing the right thing and acting in accordance with URGO Group's values.

I am faced with a situation that is not explicitly dealt with in the Ethical Charter but which strikes me as problematic. What should I do?

Start by asking yourself the following questions: Is this situation or behaviour likely to break the law? Could it have negative consequences for the URGO Group or for me? Would I feel comfortable if it got into the press? Often, the answers to these questions will put you on the right track, i.e. whether or not to report the situation. However, if you still have any doubts, you can talk to your line management or the Global Compliance Officer.

URGO

INVENT & CARE