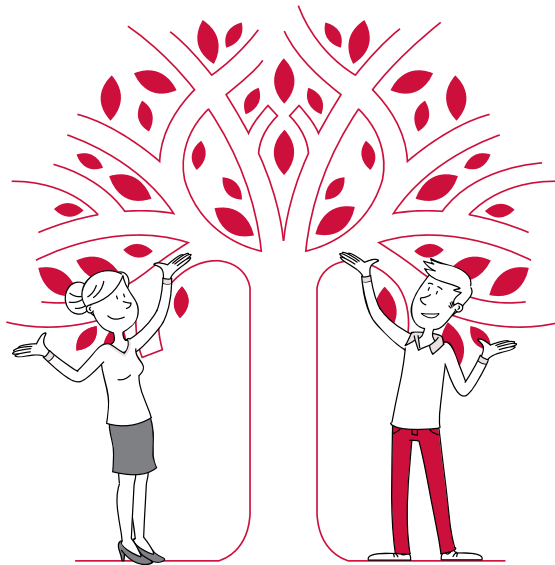


**ETHICS
CHARTER**

A BEAUTIFUL ATTITUDE



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TOWARDS ETHICS IN ACTION AND BEHAVIOR



FOREWORD

This document is inspired by the principles of the Universal Declaration of Human Rights, the United Nations Global Compact initiative and guiding principles from the OECD.

Clarins is a trusted family-owned French beauty company. We are proud of our heritage, which combines an entrepreneurial spirit, agility and curiosity.

We value the contribution of our 8,000 talented employees all around the world, and are committed to promote responsible beauty to ensure sustainable action. With two strong brands offering distinctive high-quality products and services, our mission is to make life more beautiful, passing on a more beautiful planet.

Clarins Group values are simple, authentic and embodied daily by all members of staff. They are at the heart of a corporate culture that determines the major principles of an ethical approach as a company, an employer and a socially responsible business.

Jonathan Zrihen

Président & CEO

A handwritten signature in black ink, appearing to be 'JZrihen'.

OUR VALUES

Clarins is a family firm built on values shared by everyone and implemented on a daily basis. These strong values are at the heart of the Clarins Group responsible development ambition and foster strong commitments.

Respect for the consumer, staff development, creating added value, preserving nature and sharing with society, all help to accomplish the vision of Responsible Beauty to which our Group aspires.

These shaping values and commitments are reflected into principles of action and behavior as formalized in the Ethics Charter - an ambitious global approach to provide a shared and coherent base for ethical practices and standards throughout the Clarins Group.

This Ethics Charter aims to ensure Clarins Group effectiveness and equity of governance by adopting a Beautiful Attitude.

A CHARTER FOR ALL

The Clarins Group Ethics Charter is addressed to stakeholders across the board - both internal (members of staff, management and employees, governance) and external (consumers, professionals, suppliers and service providers, public authorities, associations and non-governmental organizations).

A real reference document, the Ethics Charter applies to all Clarins Group entities, areas of activity and brands. The Charter is to be followed by each member of staff at Clarins Group including those sent on temporary assignments by a third-party company to a Clarins Group entity.

Each member of staff at Clarins Group must familiarize themselves with the Ethics Charter to ensure that it is fully respected. Clarins Group staff will also ensure that all contracting and business partners are made aware of it.

The Clarins Group and its governance are working towards bringing these principles to life by raising everyone's awareness worldwide. Anyone with a managerial role has a responsibility to set an example, champion the spirit of the Ethics Charter and assist anyone with questions regarding ethical matters.

PREAMBLE



All Clarins Group entities and members of staff worldwide comply with the laws and regulations in effect in the country in which they exercise their activity.

They ensure that they are familiar with provisions regarding Clarins Group activity, especially the professional rules of ethics.

Each member of staff must act in accordance with the laws and regulations in effect and refrain from any behavior that could lead them or lead other members of staff, their company or the Clarins Group to act in an unlawful or dishonest manner. This charter is not exhaustive and does not provide an answer to every issue. Each employee must show discernment concerning the appropriate conduct required, using common sense, commensurate with the elements mentioned in this document, or by turning to their line manager, who will support them regarding any legitimate request.

This attitude is an indispensable prerequisite for the credibility and effectiveness of our approach.

The Clarins Group wishes to share these principles with its partners.

In the event of a discrepancy between a local law or custom and the guiding principles contained in the Clarins Group Ethics Charter, the actions arising therefrom must not lead to unlawful behavior or activity.

OUR ETHICS IN ACTION AND BEHAVIOR

*Each
Clarins Group
value expresses
strong ethical
principles of action
and behavior that
ensure the Clarins
Group responsible
development with
respect for people
and nature.*

RESPECTING PEOPLE

The Clarins Group is committed to a fair human resources policy, in compliance with legislation, that promotes diversity of talent, ensures the occupational health and safety of all its members of staff, and respects the right to privacy.



Diversity and dignity

The Clarins Group promotes equal opportunity for all and professional diversity, which is reflected in zero tolerance of any form of discrimination, for any reason whatsoever, both during hiring and in working relations.

In general, any behavior that is disrespectful or undermines the dignity of the individual is prohibited, in particular any form of harassment whatsoever. Respecting the individual means committing to employment ethics: equity in terms of staff professional development, training, prospects for advancement valuing skills and creativity, the development of areas of activity and skills, vocational training courses, labor relations fostered with staff representative bodies, and trade union pluralism. Labor relations and relations between staff members are themselves based on respect, trust and goodwill.

Safety for all

As a responsible employer, the Clarins Group is engaged in an occupational health and safety initiative for all its members of staff. It ensures that all of its activities comply with the health legislation and regulations in effect and strives to implement best practices.



Health and safety concern everyone. Each member of staff must personally remain vigilant in this respect and play an active role in prevention to bring this commitment to life, including in relations with their service providers.

Privacy and personal data



Respect for the right to privacy and personal data protection are a fundamental right to which the Clarins Group is committed, both among its members of staff and its partners (consumers, service providers, etc.).

Personal data must be used fairly, with a precise, explicit and legitimate aim, and must only be kept for the period necessary for the purposes of the processing in question. Each Clarins Group member of staff ensures compliance with the laws regarding respect for the privacy of members of staff, consumers and partners, especially legislation governing computer files. Everyone is recommended to familiarize themselves with the rules specific to computer safety and security, referring in particular to the IT Charter.

**MAINTAINING
CONSUMER TRUST
AND COMMUNICATING
TRANSPARENTLY**



Respecting customers

The Clarins Group pays strict attention to the safety and quality of its products, through innovation and the highest standards of excellence in the choice of products respectful of human health. With this aim, the traceability of all of the ingredients and raw materials is ensured by the Group.

The Clarins Group makes every effort in terms of quality and safety, using rigorous evaluation methods. If a product or a process deviates from our standards, you must approach your nearest manager to remedy the situation. The same applies to alerts from our consumers, taking care to follow the cosmetovigilance procedure.



The Clarins Group provides its consumers with honest and clear information and guarantees the confidentiality of personal information provided by its clientele.

Concerned by responsible consumption, the Clarins Group looks to guarantee the responsible communication and promotion of its products and to raise consumer awareness.

Communicating reliably and transparently

The Clarins Group attaches great importance to the quality of information and provides transparent and reliable information, especially with regard to the public.

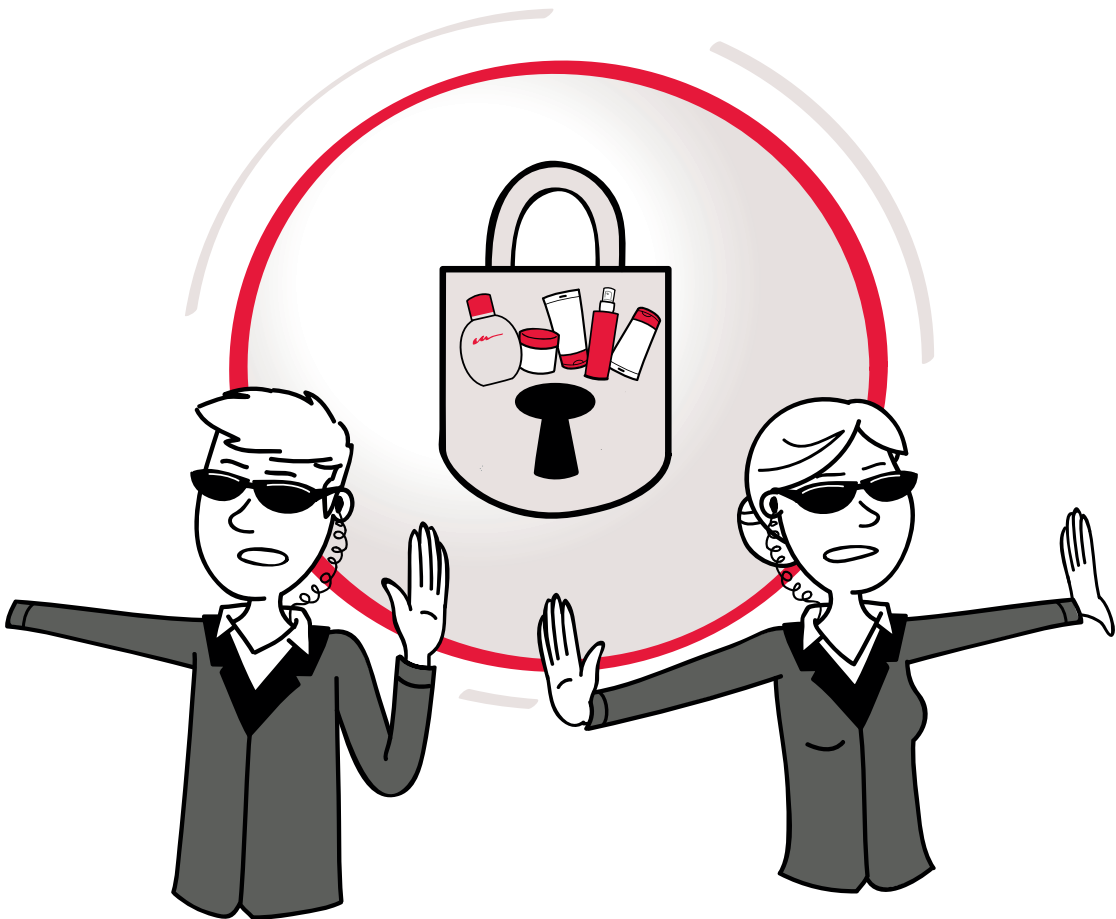
The Group especially endeavors to provide honest, high-quality information to third parties, through its advertising communications, during its business relations.

Transparency, sincerity and accuracy in conveying and communicating any information are part of the ethics of professional behavior required of each Clarins Group staff member.

→ *Practical example*

Each member of staff must ensure that all of the information featuring in financial or other documents is accurate, including extra-financial reporting. If an error is detected in a professional document, you must inform your line manager thereof in order to protect Group interests. Everyone is asked to cooperate with internal or external auditors.

**PROTECTING
THE COMPANY**



Confidentiality and protection of sensitive information

Information that is not public must be protected, whether it is privileged, sensitive or confidential, and whether it is information concerning the Clarins Group, its members of staff or third parties.



Everyone must therefore take care to comply with the legal and regulatory provisions in effect, especially with regard to respect for copyright, privacy, trade secrets or confidentiality.



Everyone must especially take care not to disclose confidential information to persons external to the Clarins Group, to take all of the necessary precautions to this effect, especially when travelling, and to respect the rules of circulation, reproduction, conservation and destruction of all Clarins Group information documents or media.

→ *Practical example*

By way of an illustration, an example of privileged information is information regarding the issuance of authorization for a new product, financial results, investment and research projects, important results from clinical studies, etc.

As long as the Group has not signed an agreement or a confidentiality and nondisclosure clause with a third party, this third party, whether a person or company, is not allowed access to sensitive and confidential information concerning a Clarins Group product.

Image protection



***The Clarins Group
promotes the responsible
use of communication
networks and social media
among its members of staff***

*(forums, social networks, blogs,
photo and video sharing
sites, etc.).*



**In addition, expressing
yourself in the name or
on behalf of the Clarins
Group is forbidden
without express
authorization.**

→ Practical example

Without the prior agreement of those concerned, it is recommended not to publish photos of your colleagues taken during internal company events on personal blogs or online sites.

Clarins Group Assets



Each member of staff has a duty to protect the brands, goods, resources and property of the Clarins Group, which is the owner thereof. This commitment looks to protect the Clarins Group assets.

They will thus take care not to use goods and resources placed at their disposal by the Clarins Group, whatever they may be, in an inappropriate manner or for personal ends. These goods and resources must be protected under all circumstances and their use must remain within the appropriate limits of professional duties.

Clarins Group assets include ideas and know-how formulated by the Clarins Group members of staff, as well as its reputation. All of the data or information to which members of staff have access when performing their duties are also Clarins Group assets.

These assets must be protected even after the departure of a member of staff.

→ *Practical example*

Brand products are part of company's assets. Privileged access for members of staff to these products is understood to be strictly for personal and family use and they must under no circumstances be resold at any price whatsoever. Likewise, the products that may be offered to a third party within the framework of business relations must be restricted in number in order to preserve the image of the products and represent a symbolic value to respect the ethical rules of fair practice.

PROMOTING FAIR RELATIONS AND FAIR PRACTICE

The Clarins Group prioritizes collaborative relations based on trust, partnership, sharing, solidarity, and helping to create value in its relations with its members of staff and various stakeholders.



Fair relations

The Clarins Group undertakes to maintain fair and equitable relations with its partners (suppliers, distributors, subcontractors, etc.).

Likewise, the Clarins Group requires all of its business partners and service providers to respect the highest ethical standards in everything that they do, with respect for labor requirements, respect for human rights and working conditions, and requirements in terms of the environment and business conduct.



The Clarins Group provides the Ethics Charter and all codes of conduct and internal procedures to those concerned.

In particular, the Clarins Group provides the anti-corruption Code of Conduct and the supplier charter. The Clarins Group expects partners to comply with the principles set out in these different documents with transparency and sincerity.

The Clarins Group undertakes to act completely independently in the public sphere.

Fair practice

The Clarins Group prohibits any form of active or passive corruption or involvement in influence peddling or favoritism and encourages fairness in all of its contractual relations.

Accordingly, no Clarins Group member of staff must directly or indirectly grant undue advantages, of any kind whatsoever and by any means whatsoever, to a third party with a view to obtaining or maintaining a business transaction or preferential treatment.

Each member of staff shall avoid relationships with third parties likely to put them personally in a position of conflict of interest or of obligation and raise doubts as to their integrity. Likewise, they will take care not to expose to such a situation a

third party whom they are endeavoring to convince or persuade to do business with a company in the Clarins Group. Each member of staff is required to comply with the anti-corruption Code of Conduct in effect in the Group.

Gifts may only be offered or accepted in the name of a company in the Clarins Group when their value is symbolic or low in view of the circumstances and provided they are not such as to raise doubts concerning the integrity of the giver or the impartiality of the recipient.

**HELPING
TO PRESERVE
HUMAN RIGHTS
AND NATURE**



Preserving fundamental social rights and the local fabric

The Clarins Group is socially responsible and committed to the partners and communities with whom it develops its activities: combatting forced labor, child labor, harassment, and discrimination, and promoting decent work, emancipation for women, freedom of association, and health and safety.



A civic-minded company open to the world, the Clarins Group supports projects in line with its social priorities: children's rights, medical research, biodiversity and the environment. It cooperates with numerous non-governmental and humanitarian organizations.

Respecting the environment and natural resources

From the outset, the Clarins Group has been strongly committed to preserving nature, biodiversity and its environment.



The Clarins Group also endeavors to anticipate its impact on the environment across all of its activities, in order to minimize it as part of an eco-design and circular economy approach.


Reducing the impact of its activities, practices and actions, maintaining and developing environmentally friendly manufacturing methods, and promoting the use of eco-friendly products and packaging form part of the Clarins Group's continuous improvement approach.

By designing formulas that are even safer, more environmentally friendly and respectful of biodiversity, with natural, plant-based raw ingredients, the Group looks to contribute to Responsible beauty.

All actions and activities carried out by staff members fall within this improvement program.

IMPLEMENTATION





This Charter is communicated to all entities in the Clarins Group in order to ensure that it is known, accepted and applied within all divisions and brands in the Group.

Each entity of the Clarins Group is responsible for bringing to life and applying the ethical principles of governance, action and behavior set out in this Charter.

Each member of the Clarins Group, irrespective of their tasks and responsibilities, must take on board the principles contained in the Ethics Charter and make sure they are implemented when performing their daily professional duties.

These ethical principles must be reflected in the involvement and ethical behavior of each Clarins Group member of staff under all circumstances.

The Charter must allow everyone to question themselves regarding the attitude to be adopted in the tricky situations they may encounter in their relations inside and outside their company.

If the member of staff believes that a legal or regulatory requirement or a principle set out in the Clarins Group Ethics Charter is not respected, or that there is a risk that non-respect may occur, they must inform their line manager or any specialist ad hoc committee thereof as soon as possible.



A FEW USEFUL REFERENCES

International agreements to which the Clarins Group refers

- Universal Declaration of Human Rights
- United Nations Global Compact initiative
- OECD Guiding Principles
- The International Labour Organization Fundamental Conventions
- Millennial Goals
- UNESCO Convention on the Rights of the Child

Other resources

- Supplier Code of Conduct
- Transport Charter
- Group Purchasing Procedure
- IT Charter
- Internal Regulations
- Anti-corruption Code of Conduct
- Whistleblowing systems
 - Clarins group (except for Spain, United States of America, Canada, Russia and Japan: <https://report.whistleb.com/fr/clarins>)
 - United States of America and Canada : <https://secure.ethicspoint.com/domain/media/en/gui/69699/index.html>
 - Spain: <https://canaletico.es/es/clarins>
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