



RESPONSIBLE INGREDIENT SOURCING CHARTER



1. Classification of raw materials.

The raw materials incorporated into Clarins products are made up of one or several ingredients.

They are classified into three different categories:



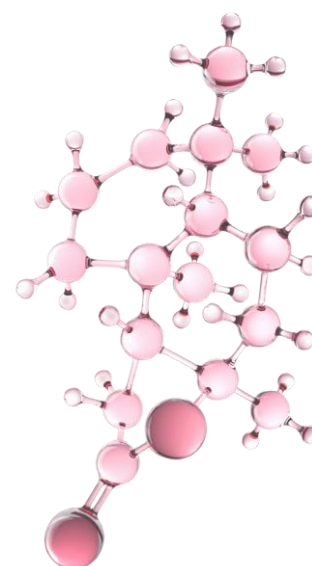
Plants.

- ✓ Extracts of plants, oils, butters, waxes, or essential oils.



Natural derivatives.

- ✓ Excipients of natural derivatives, ingredients obtained via biotechnology or non-agro sourced solvent.



Synthetic ingredients.

- ✓ Peptides, key synthetic molecules, organic sun filters...

2.

Responsible sourcing.

Clarins established its responsible sourcing charter using the ISO 16128 standard as a reference, along with complementary requirements specific to the Brand.

2A. FOR PLANTS

There are 3 levels of requirements for the new PLANTS that become part of CLARINS herbarium:

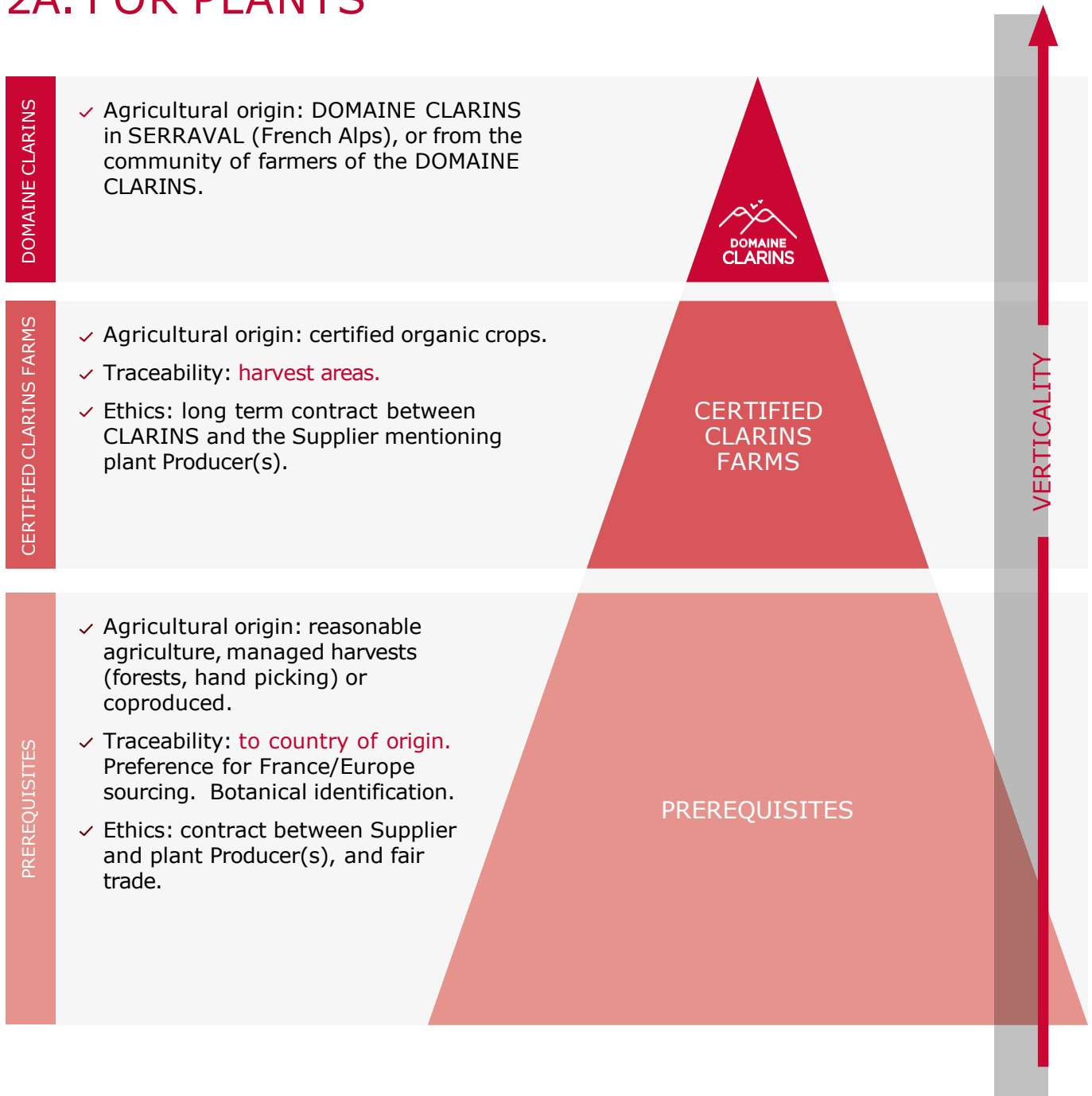
- ✓ 'Domaine CLARINS': plant from the Domaine CLARINS (in French Alps) and, if needed, as a complement, 'Certified Clarins Farms' supply chain.
- ✓ 'Certified CLARINS Farms' (CCF): traceability to harvest area.
- ✓ 'Prerequisite': minimum requirement. Raw materials that do not meet Prerequisite criteria cannot be included in the CLARINS catalogue .

Each level of requirement must include the previous requirement level (it addresses the contents and adds its own requirements).

No protected species harvested in the wild may be used.

2. Responsible sourcing.

2A. FOR PLANTS



2.

Responsible sourcing.

2B. FOR NATURAL DERIVATIVES

Traceability

CLARINS is committed to rolling out a sourcing and traceability policy:

- ✓ on primary agricultural supply chains: palm oil, sugar cane, soy, coconut oil, sugar beet, rapeseed, and shea
- ✓ and mineral supply chains: primarily for mica, via the Responsible Mica Initiative.

CLARINS favours agricultural supply chains that have complete traceability back to the country of origin, and if possible, all the way to the area of harvest.

To meet the different challenges of the various supply chains and to make improvements where possible, CLARINS developed biodiversity programs and/or social projects in partnership with suppliers.

Biodegradability/Ecotoxicity

CLARINS favours the use of materials that are easily biodegradable and/or without any ecotoxic risk when developing product formulas.

CLARINS also favours using raw materials whose manufacturing process respects the principles of 'green' chemistry.

2C. FOR SYNTHETIC INGREDIENTS

Ingredients of synthetic origin selected by Clarins are without any risk of ecotoxicity and/or are biodegradable.

Clarins favours synthetic ingredients from 'green' chemistry and looks for alternative ingredients from renewable resources.

APPENDIX 1.

Definitions.

ORGANIC CERTIFICATIONS

Organic farming practices and the certifications that accompany them are accepted regardless of the certifying organizations as long as these organizations are known in Europe.

SUSTAINABLY MANAGED FORESTS

The following sustainable forestry programs are accepted: PEFC, FSC or any other effort that helps to guarantee controlled and sustainable exploitation of forests that are validated by an independent certifying organization on the condition that CLARINS has previously validated.

REASONABLE AGRICULTURE

Reasonable agriculture according to Clarins is based on four themes: biodiversity, soil quality, water resources and phyto-sanitary products. Respect for regulations in place for the different themes is also necessary to practice reasonable agriculture. Non-compliance criteria regarding reasonable agricultural practices includes:

- ✓ Not respecting areas of conservation of flora and fauna according to local rules in place;
- ✓ Systematic use (without distinction) of phyto-sanitary products;
- ✓ No training for personnel who handle phyto-sanitary products;
- ✓ Not respecting the recommended amount of phyto-sanitary products (with follow up dates and volumes used).

FAIR TRADE

The following certifications/labels are accepted: Fair For Life, UEFT, Fairtrade FLOCERT or any other certification from a certified independent organization as long as previously validated by CLARINS.

CLARINS BONUS

An indexation is carried out based on the purchase price of raw materials which makes it possible to ensure a certain amount of money year round. This amount of money makes it possible to set up social and environmental projects in the geographic area directly impacted by the supply chain, preferably in countries with low HDI.

HUMAN DEVELOPMENT INDEX (HDI)

The Human Development Index is a composite statistical index developed by the UN and is used to evaluate the level of human development in countries worldwide. HDI is based on three criteria: gross domestic product per inhabitant, life expectancy at birth and the level of education of those aged 17+.

PROTECTED SPECIES

Protected species are plant species that appear on the 'red list' of the International Union for the Conservation of Nature found in Appendices I, II, and III of the Convention on International Commerce of Endangered Wild Flora and Fauna Species (at risk of becoming extinct) dated 3 March 1973.

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SYNTHETIC INGREDIENTS

'Synthetic ingredients' refer to ingredients that are not natural, as described in Article 5 of the ISO 16128-1 standard and 4.3.2 of the ISO 16128-2 standard. Included in this category are raw materials whose primary ingredient is considered a non-natural ingredient according to the ISO 16128 standard or whose natural origin content is less than or equal to 50% (for substance mixtures).

CERTIFIED CLARINS FARMS

A level of required sourcing criteria for raw materials in the PLANT category described in the chapter 'Responsible Sourcing of Plants – Level 2'. Designated as a privileged plant partner for CLARINS or supplier for whom traceability of the harvest area is established and a commitment with CLARINS is made formal.

GREEN CHEMISTRY

Green chemistry's goal is to develop chemical products and processes that make it possible to reduce or eliminate the use of and the synthesis of dangerous substances. Green chemistry is based on 12 principles* that help reduce and eliminate the use of substances that are harmful/dangerous for the environment.

CLARINS GREEN SCORE

Data sharing platform on raw materials with suppliers and internal CLARINS tool that evaluates environmental and social criteria of raw materials.

DOMAINE CLARINS AGRICULTURAL COMMUNITY

Agricultural partners near the Domaine CLARINS.

NATURAL DERIVATIVE CONTENT OR NCD

Corresponds to content of natural origin of ingredient blends described in the ISO 16128-2 article 5.2 standard.

NATURAL DERIVATIVE

The notion of 'natural derivatives' corresponds to those 'ingredients derived from natural materials' as presented in Article 3.1 of the ISO 16128-1 standard and 4.3.2 of the ISO 16128-2 standard. CLARINS requires that the main ingredient of the raw material be considered either as an ingredient of natural origin according to the ISO 16128 standard and that the content of natural origin of the raw material be more than 50% (this is the case for substance blends).

* <http://www.unesco.org/new/fr/natural-sciences/science-technology/basic-sciences/chemistry/green-chemistry-for-life/twelve-principles-of-green-chemistry/>

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DOMAINE CLARINS

An agricultural enterprise located on an Alpine farm located in Serraval (property of the COURTIN-CLARINS family).

BIODEGRADABILITY INDEX

The biodegradability of a substance is its ability to be broken down by micro-organisms.

BIODEGRADABLE MATERIALS

The aptitude of a body to be biologically broken down in a particular environment that takes into account the degree of decomposition and time necessary to this decomposition as well as products of degradation. According to the value obtained (OCDE 301B test), the raw material is classified on 2 levels: *biodegradable* if the value lies between 60-90% and *easily biodegradable* if the value is above 90%.

RAW MATERIALS

Can be made up of one or several ingredients.

RAW MATERIAL PRIMARY INGREDIENT

Ingredient that promotes the raw material's main activity.

PLANTS

The notion of 'Plants' corresponds to 'natural ingredients' from a vegetal species, as defined in Article 2.1 of the ISO 16128-1 standard and 4.3.1 of the ISO 16128-2 standard. Included in this category are raw materials whose main ingredient is a vegetal species and whose index is considered to be a natural ingredient according to the ISO 16128 standard and whose raw material natural origin content overall is more than 50% (this is the case for substance blends).

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Definitions.

RESPONSIBLE MICA INITIATIVE

The Responsible Mica Initiative is a coalition of committed stakeholders whose mission is to put in place a responsible and sustainable supply chain for mica in India, that excludes child labor, by 2022. To learn more, please visit: RMI - About us (responsible-mica-initiative.com)

ECO-TOXIC RISK

The risk of toxicity on raw materials' aquatic environment. To evaluate this risk, different OCDE models are used: toxicity of aquatic flora by determining growth of green algae in fresh water (*Pseudokirchneriella subcapitata*) after 72 hours of exposure to a substance (OCDE 201); toxicity of aquatic fauna (fresh water) by determining concentration which, in 48 hours immobilizes 50% of daphnies (*Daphnia magna*) (OCDE 202) and toxicity to coral (*Seriatopa*) by measuring the minimal amount that causes retraction of polyps and/or the whitening of coral buds at 48 hours and 96 hours.

AGROSOURCED SOLVENTS

Meet the definition of ingredient of natural origin according to ISO 16128.

APPENDIX 2.

Charte des bonnes pratiques de cueillette sauvage.

La nature est un milieu vivant et qui peut, si nous n'y prêtons pas une attention adéquate, se dégrader rapidement. Il est donc de la responsabilité de tous : cueilleurs, fournisseurs d'extraits, fabricants cosmétiques intégrant des extraits naturels et tout autre intermédiaire, de nous assurer du respect de l'écosystème et de sa biodiversité tout particulièrement lors des cueillettes sauvages.

Sont considéré ici par cueillette sauvage, les végétaux récoltés dans des zones agricoles ou non cultivées et dont la croissance et le développement se font de manière spontanée.

C'est dans cette démarche que le groupe CLARINS, fabricant de produits cosmétiques de luxe, a décidé de mettre en place une charte de bonnes pratiques de cueillette sauvage, dont l'objectif est de s'assurer que tous les acteurs et leurs partenaires impliqués dans la collecte de plantes partagent, respectent et font respecter auprès de leurs propres tiers les engagements suivants :

RESPECT DE LA PROPRIÉTÉ

Le cueilleur s'engage à :

- ✓ Demander et obtenir l'autorisation écrite du ou des propriétaires des parcelles (ONF, communes, collectivités, particuliers...) pour cueillir des plantes sur leurs terres (par exemple signature du propriétaire sur la fiche de collecte¹ fait foi de son accord).
- ✓ Respecter les équipements et installations présents sur les zones de cueillette (clôtures, cultures implantées...).
- ✓ Respecter la propreté des lieux en ne laissant aucun déchet.
- ✓ Récolter sur des sites à l'écart de toute pollution identifiable et dans la mesure du possible, des sites préalablement certifiés BIOLOGIQUES.

¹Ecocert formulaire "déclaration pour la cueillette de végétaux dans des zones naturelles ou agricoles" (F-SC-323).

Best practices for wild harvesting charter.

Nature is a living place and if we do not take care of it correctly, it will deteriorate. Harvesters, plant extract suppliers, manufacturers who use plant extracts in products and all other intermediaries, have a huge responsibility in respecting ecosystems and biodiversity particularly when wild harvesting.

Wild harvesting is defined as: all plants harvested in agricultural or non-agricultural areas where growth occurs spontaneously.

The Clarins Group – manufacturer of luxury cosmetics products – has decided to implement a Best Practices for Wild Harvesting Charter.

The purpose of this charter is to make sure that all actors, partners and third parties engaged in harvesting plants share, respect and enforce the following commitments:

RESPECT OF PROPERTY

Harvesters commit:

- ✓ To request and obtain written authorization from land owners (ONF, towns, local authorities...) to harvest plants present on their land (for example, an owner's signature on a harvest certificate¹ is proof of commitment).
- ✓ To respect all materials and installations present in the harvesting area (fences, plant cultures...).
- ✓ To respect property by leaving it waste free.
- ✓ To harvest on land which has been certified as ORGANIC and that shows no signs of pollution.

¹Ecocert form "déclaration pour la cueillette de végétaux dans des zones naturelles ou agricoles" (F-SC-323).

APPENDIX 2.

Charte des bonnes pratiques de cueillette sauvage.

Best practices for wild harvesting charter.

RESPECT DES RESSOURCES NATURELLES

Il est indispensable que le cueilleur connaisse bien les plantes qu'il cueille afin d'éviter toute confusion sur le terrain ainsi que la réglementation des espaces naturels protégés des zones de collecte.

Le cueilleur s'engage à :

- ✓ Prélever uniquement des espèces non protégées².
- ✓ Récolter uniquement les parties ou végétaux entiers répondant à la demande du client.
- ✓ Tenir un cahier de cueillettes avec les cartes des sites, les dates et les quantités récoltées.
- ✓ Former et sensibiliser aux bonnes pratiques de cueillettes sauvages toutes personnes employées.
- ✓ Veiller à ne pas épuiser un site déjà cueilli en échangeant avec les autres cueilleurs.
- ✓ Respecter les cycles végétatifs, les modes de reproduction des végétaux et leur capacité de régénération en prenant soin de ne pas récolter toutes les plantes sur la zone de cueillette mais en laissant une partie indemne. Attention : certaines espèces ont une capacité de multiplication faible, il est indispensable de s'informer au préalable afin d'assurer la survie de l'espèce.

Conseils : pas plus de 10% dans le cas de récolte de plantes entières et une quantité maximale équivalente à 5% pour les racines, rhizomes ou bulbe et ce, une fois tous les 3 ans. En fonction de l'espèce récoltée, il peut être conseillé de ne pas revenir chaque année sur le même lieu de cueillette.

2. Se référer par exemple aux listes des espèces protégées par département sur le territoire Français ou toute autre réglementation locale, nationale et/ ou internationale.

RESPECT FOR NATURAL RESSOURCES

It is essential that harvesters have full knowledge of the plants to be harvested and the rules governing harvesting in a protected natural area to avoid any confusion during harvesting.

Harvesters commit:

- ✓ To harvest only non-protected species².
- ✓ To harvest only the plants or parts of plants required by a client.
- ✓ To keep a harvesting diary including information about the land, harvest dates and crop volumes.
- ✓ To train and make all employees aware of the Best Practices for Wild Harvesting Charter.
- ✓ To avoid over-harvesting land by exchanging with other harvesters.
- ✓ To respect plant growth cycles, reproduction methods and regeneration capacity by taking care to leave a certain number of plants uncollected during harvesting.
Warning: Some species have low reproduction capacity. Before harvesting, please check all information concerning plant conservation

NB: A maximum of 10% of land should be harvested when collecting whole plants. A maximum of 5% of land should be harvested when collecting roots, rhizomes or bulbs. Depending on species, it may be preferable to avoid choosing the same plot each year.

2. For example, referring to regional protected species lists on French territory or other local, national or International regulations.

APPENDIX 2.

Charte des bonnes pratiques de cueillette sauvage.

Best practices for wild harvesting charter.

RESPECT DES CONDITIONS SOCIALES

Le cueilleur s'engage à :

- ✓ Employer que des personnes ayant l'âge minimum légal.
- ✓ Ne pas recourir au travail forcé ou à des mesures disciplinaires qui englobent punitions corporelles, pression psychologique ou verbale, violence verbale ou encore retenues salariales.
- ✓ Fournir un salaire au moins égal au minimum légal en vigueur dans le pays.
- ✓ Respecter la durée maximale de travail.

Nos fournisseurs certifient avoir lu, accepté et appliqué la présente Charte des Bonnes Pratiques de Cueillette sauvage et la faire valoir auprès de leurs partenaires.

RESPECT FOR SOCIAL CONDITIONS

Harvesters commit :

- ✓ To employ people who have reached the minimal legal age to work.
- ✓ To not rely on forced labor or disciplinary measures like corporal punishment, psychological or verbal pressure, verbal violence or payroll deductions.
- ✓ To pay a legal minimal salary.
- ✓ To respect maximum work time periods.

Our suppliers certify to have read, accept and apply this Best Practices For Wild Harvesting Charter and promote it to their partners.

POUR LE GROUPE CLARINS / FOR THE CLARINS GROUP

Représentant / Represented by: Sandrine WEBER

Titre / Title: Responsable Filières et Programmes Durables / Sustainable Sourcing Manager

Signature / Signature:



GROUPE CLARINS

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