



# CODE OF CONDUCT

## THIRD PARTIES

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## INTRODUCTION

Ethical values have always been at the core of LA VIE CLAIRE's strategy and development.

Working with integrity, fairness and honesty taking account environmental issues and sustainable development is an LA VIE CLAIRE's inherent value.

Behaving ethically, acting in accordance with laws and regulations must be the priority for each of us.

The law No. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life (known as "Sapin II") has reinforced this ethical requirement.

In addition to the implementation of the mandatory provisions of the Sapin II Law in the fight against corruption, this code of conduct (hereinafter "the Code") sets out the fundamental principles that each person working with LA VIE CLAIRE (hereinafter after referred to as "Third Parties") undertakes to respect in all of its activities in France and abroad and to enforce compliance with its subcontractors, subsidiaries, employees.

A Third Party, under this Code, is any natural or legal person working with LA VIE CLAIRE: supplier, service provider, subcontractor, consultant, commercial agent, retailer, partner, including their employees, subsidiaries and the employees of their subsidiaries.

The Code is based on all the national, european and international texts which apply in this area (including in particular the texts, principles and objectives of the UN and the conventions of the ILO), as well as on the ethical values promoted by LA VIE CLAIRE and in particular taking account the challenges of sustainable development which are at the core of LA VIE CLAIRE's business model.

Compliance with this Code determines the commercial relations between the Supplier and LA VIE CLAIRE.

This Code cannot be comprehensive and deal with all the situations that may arise, nor provide information on all the applicable regulations. However, each Third Party is expected to act at all times in compliance with the letter and spirit of the Code, with integrity, honesty and fairness.

Each Third Party is responsible for implementing this Code and rolling out its guidelines according to the specificities of its activities and/or its geographical location, as well as the applicable regulations. He must take the necessary steps to inform his employees, subcontractors and subsidiaries of the liabilities and obligations arising.

If local laws or regulations permit behavior that does not comply with this Code, it is requested from each one to enforce the rules of the Code.

We thank you for paying the greatest attention to reading and respecting this Code of Conduct.

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## PARTIE 1 : GENERAL PRINCIPLES

Each Third Party undertakes to comply with all laws, regulations and, in general, any national or international standard regarding :

- Human rights
- Fight against corruption
- Labour law, social rights and protection for the health and safety of workers
- Respect for the principles of Organic farming
- Protection of the environment
- Respect for the principles of energy saving
- Respect for confidentiality and protection of personal data

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## PARTIE 2 : HUMAN RIGHTS

As concerns Human Rights, the Third Party undertakes to comply with all the texts of the United Nations Organization adopted in this area and in particular :

- The Declaration of Human Rights on December 10, 1948,
- The principles of UN's Global Compact and the UN's Global Goals,
- The International Labour Organization's Core Conventions,
- All national and european laws and regulations on Human Rights

The Third Party guarantees compliance with these texts by its subsidiaries, subcontractors and all of their own employees.

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## PARTIE 3 : FIGHT AGAINST CORRUPTION

Any form of corruption, embezzlement, money laundering, extortion, bribery shall not be practiced, permitted or even tolerated by the Third Party, its subsidiaries, subcontractors, or their own collaborators in their transactions with any government official or private sector actor.

The Third Party also undertakes that its employees avoid any situation of conflict of interest with their personal interests or those of their relatives.

The Third Party may not promise, authorize, give, offer, pay, directly or indirectly, any payment of any value to anyone with the purpose or intention of inducing that person to use his authority to assist the Third party or any other person. It will not accept any payment or benefit of any kind whatsoever as an encouragement or reward for any act or indulgence relating in particular to any goods or services provided to LA VIE CLAIRE. In general, the Third Party shall carry out its activities in a transparent and ethical manner.

In particular, the Third Party shall refrain from offering LA VIE CLAIRE's employees any benefit, invitation, gift, or any money that may influence or give the appearance of influencing a business or administrative decision.

Nevertheless, if the applicable regulations permit it, the Third Party may offer LA VIE CLAIRE's employees gifts of a sufficiently low value not to be perceived as an attempt at corruption, provided that these gifts are not offered frequently and inappropriately and on the condition that they systematically bear the brand, or any other distinctive sign, specific to the Third Party.

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## PARTIE 4 : LABOUR LAW, SOCIAL RIGHTS AND PROTECTION OF THE HEALTH AND SAFETY OF WORKERS

The Third Party, its collaborators and subcontractors undertake not to use any form of forced, undeclared, compulsory or bonded labor, including prison labor or any form of slavery.

All work must be done voluntarily, without threat of penalties or sanctions. The employees of the Third Party and its subcontractors may not be forced to work outside the framework of their contract and may terminate their contract in accordance with the applicable law.

The Third Party undertakes not to resort to concealed employment and as such, to carry out for all of its staff all affiliations and declarations to all the competent social protection institutions. He also undertakes not to work with subcontractors who do not comply with these obligations and guarantees compliance with this commitment to LA VIE CLAIRE.

The Third Party undertakes to treat its employees with dignity and respect. Any form of forced labor, coercion and physical or psychological harassment, as well as any threat is strictly prohibited.

The Third Party undertakes to pay its employees in accordance with the applicable regulations and to offer them working conditions and working time that comply with the relevant international conventions.

The Third Party should not employ children under the legal age provided for by the ILO convention relating to the health, safety and morality of minors.

The Third Party undertakes to treat all of its collaborators equally without there ever being any discrimination based on sex, religion, belonging to a minority, age, health or pregnancy, union or political affiliation or even culture.

The Third Party must, at all times of the exercise of their functions, ensure the health and safety of its employees and must, at the very least, comply with all the applicable regulations, laws and standards in terms of health and safety at the work.

In general, he undertakes to respect all the obligations defined in the Labor Code.

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## PARTIE 5 : RESPECT FOR THE PRINCIPLES OF ORGANIC FARMING

The Third Party undertakes to comply with all French and European regulations on Organic Farming as well as the specifications sent by LA VIE CLAIRE.

In particular, he must respect the main principles of Organic Agriculture, namely the sustainable management of agriculture, respect for natural balances and biodiversity, the promotion of high quality products, the obtaining of which must not harm the environment, nor to human health, nor to the health of plants, animals or their well-being.

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## PARTIE 6 : PROTECTION OF THE ENVIRONMENT

The Third Party must conduct its activities in an environmentally friendly manner and comply with all laws and regulations in force in the country of manufacture or delivery of the products or services concerned. It undertakes to continually minimizing the impact of its activities on the environment (energy, water, waste, chemicals, air pollution, climate change, preservation of biodiversity, etc.) and set targets for reducing these impacts.

Choosing partners : wishing to move towards a process of creating shared value, LA VIE CLAIRE will favor Third Parties offering products or services with a lower environmental impact, complying with the specifications requested by LA VIE CLAIRE and enhancing the implementation of good practices that respect the environment.

The Third Party shall promote environmental responsibility within its company and encourage the development and use of technologies aimed at minimizing all environmental impacts throughout its subcontracting and supply chain.

The Third Party must have all the operating and environmental authorizations necessary for its activity and must be able to provide them on first request.

Favoured means of transport : regarding exotic products, they shall be transported by the means of transport with the lowest environmental impact.

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## **PARTIE 7 : RESPECT FOR THE PRINCIPLES OF ENERGY SAVING**

The Third Party, its employees and subcontractors undertake to respect the principles of energy saving.

They undertake to implement actions enabling them to reduce their energy consumption each year and to do everything possible to save as much energy as possible during their daily activities.

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## **PARTIE 8 : RESPECT FOR CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA**

The Third Party undertakes to keep confidential all the information and documents of which it becomes aware in the context of its relationship with LA VIE CLAIRE.

In the event that the Third Party is required to process personal data. He undertakes to comply with the following regulations (hereinafter the "Regulations") :

- French Law No. 78-17 of January 6, 1978 as amended, relating to computer technology, files and freedoms ;
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter "GDPR");
- French Law No. 2018-493 of 20 June 2018 relating to the protection of personal data.

The Third Party is responsible for compliance with its obligations under the Regulations and undertakes that its employees and subcontractors also comply with them.

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## **PARTIE 9 : AUDIT**

The Third Party agrees that LA VIE CLAIRE may audit the Third Party's compliance with the commitments provided for in this Code of Conduct.

The Third Party undertakes to do everything so that LA VIE CLAIRE can carry out this audit in the best possible conditions (access to premises, availability, transmission on first request of information and consultation of any document) and guarantees compliance with this commitment by its employees and subcontractors.

In the event of a breach of this Code of Conduct, LA VIE CLAIRE shall send a written request to the Third Party listing all the breaches and the actions to be implemented and the deadline for remedying them.

LA VIE CLAIRE will carry out a control audit to ensure the effective implementation of these actions.

If it fails to implement the actions on time, LA VIE CLAIRE may breach relations with the Third Party, to the exclusive detriment of the latter without prejudice to its right to seek compensation for the damage suffered as a result of these breaches.

