



CODE OF CONDUCT

GATTEFOSSÉ SAS
36 chemin de Genas – CS 70070
69804 SAINT – PRIEST Cedex

Version 02
Last update : 03/2025

Since its creation in 1880, Gattefossé has been designing, developing, producing, and marketing pharmaceutical excipients and natural-origin cosmetic ingredients for the health and beauty industries worldwide.

Its expertise in formulations, implemented in its four technical centers of excellence, allows it to support its clients as closely as possible to their needs.

Since its creation, Gattefossé has chosen a humanistic science that cares for people and the planet. A scientific approach that integrates attention, ethics, and responsibility at all stages of research, innovation, production, and marketing processes.

The company's values are reflected in its actions:

- **Attention and consideration** are given to both human relationships and the environment.
- **Commitment & Expertise** with a focus on a high level of excellence and utility, a high regard for the needs of its clients, respecting people and the planet.
- **Humility & Authenticity**, treating stakeholders as equals, with kindness, open-mindedness, and simplicity, sharing know-how to advance science.
- **Perseverance & Sustainability**, as an independent family business, Gattefossé takes the necessary time to do things well, while demonstrating agility and responsiveness.

Gattefossé's business practices are guided by principles of integrity, honesty, loyalty, and compliance with applicable laws.

Gattefossé employees worldwide embody and support these values daily. Compliance with laws and regulations, particularly in terms of ethics, environment, and social responsibility, is essential for the company's credibility.

This Code of Conduct presents the standards of professional behavior within the Gattefossé Group and facilitates their application by establishing minimum and non-negotiable rules.

It reflects the company's commitments and applies to all Group employees. It is distributed to all Gattefossé Group entities and communicated to new employees upon arrival. It is supplemented by various codes and policies to which employees must refer.

Available on the Gattefossé Group intranet, the Code of Conduct can be downloaded in French and English.

Each manager is responsible for promoting and embodying the commitments of this Code of Conduct to their teams. Each employee individually commits to respecting these commitments in all circumstances within the scope of their activities.

This Code cannot cover all possible situations, but it provides a reference framework for evaluating each person's activities. Employees with questions about the conduct to adopt or the interpretation of the Code's principles are encouraged to consult their hierarchy or the Human Resources Department.

For the purposes of this Code of Conduct, the term "employee" includes employees, associates, managers, and directors of the Gattefossé Group.

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

Respect for Fundamental Rights

Gattefossé is committed to respecting human rights in all its activities. This requirement is at the heart of its values and social purpose, and Gattefossé expects its employees and partners to uphold the same standards.

Gattefossé promotes the principles, freedoms, and fundamental rights recognized by the international community, including:

- The Universal Declaration of Human Rights of 1948 and its two Covenants,
- The International Covenants on Civil, Political, Economic, Social, and Cultural Rights,
- The United Nations Guiding Principles on Business and Human Rights of 2011,
- The fundamental conventions of the International Labour Organization.
- Gattefossé ensures to identify and prevent the negative impacts of its activities on society and to remedy them if necessary.

Forced Labor and Child Labor

Gattefossé adheres to the Universal Declaration of Human Rights and applies a zero-tolerance policy towards forced labor.

The company prohibits child labor and condemns all forms of illegal work, in accordance with local legislation. **Each employee must ensure promotion and respect for human rights in their daily activities.**

Compliance with Laws, Standards, and Regulations

Gattefossé and its employees are required to comply with applicable laws and regulations. Compliance with legal provisions must never be compromised. Employees must also adhere to internal rules and guidelines applicable in certain situations.

Environmental Preservation

Gattefossé is committed to respecting the environment and minimizing its negative impacts while maximizing positive measures to combat climate change, protect natural resources, and biodiversity.

Development of Circularity

The company uses its creativity to reduce the environmental footprint of its products. Through upcycling, recycling, and the development of new processes, Gattefossé creates innovative ingredients for beauty and care.

This orientation is reflected in our development chart, where upcycling is favored in the selection of our raw materials.

Biodiversity Preservation

The richness of biodiversity gives Gattefossé products their unique characteristics. The company has set measurable goals to limit the impact of its activities on biodiversity and natural resources.

Climate Action

In line with its climate trajectory, Gattefossé deploys action plans by mobilizing its stakeholders, whether internal functions (purchasing, logistics, production, etc.) or its partners and suppliers.

Its 2030 greenhouse gas emission reduction targets are validated by SBTi and published on its website.

Traceability and Transparency

Supply chain traceability is essential to ensure responsible practices. This requires the adoption of specific tools and the commitment of the entire value chain.

Each employee is encouraged to adopt energy-saving behaviors and respect biodiversity, and to actively participate in awareness and training programs.

Promoting Responsible Practices with Partners and Suppliers

Gattefossé is committed to maintaining and promoting responsible practices towards its partners and suppliers, key elements of its value chain. Gattefossé aims to share its values of excellence, innovation, and commitment.

Gattefossé contractually requires its partners and suppliers to respect the principles of its Responsible Purchasing Charter and to ensure that their own partners and suppliers do the same.

The Responsible Purchasing Charter specifies:

- Gattefossé's standards in terms of social responsibility,
- The environmental performance issues defined by Gattefossé,
- The requirements in terms of business ethics and integrity,
- The control and access to information mechanisms that Gattefossé reserves vis-à-vis its partners and suppliers,
- The commitment of partners and suppliers to comply with the requirements of this Code of Conduct.

In case of non-compliance with the Responsible Purchasing Charter by a partner or supplier, Gattefossé reserves the right to demand the correction of non-conformities, suspend purchases, refuse delivery or return any goods pending remediation, and terminate the business relationship, without prejudice to any other rights or remedies.

Gattefossé requires each employee to ensure that the partners and suppliers they work with commit to respecting the principles of the Responsible Purchasing Charter.

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

Providing a Caring and Inclusive Work Environment

Fighting Against All Forms of Discrimination

Gattefossé is committed to ensuring that each employee can enjoy their rights without distinction of ethnic, national, social, or cultural origin, gender, sexual orientation, disability, age, family situation, religion, political beliefs, or union affiliation.

Equal treatment is a central element of the Gattefossé Group's human resources policy, which bans all discrimination at all stages of the relationship with employees, whether in terms of recruitment, remuneration, working hours and rest, paid leave, maternity or paternity protection, job security, job assignments, evaluation, training, employment prospects, and occupational health and safety.

Gattefossé requires each employee to fight against all forms of discrimination and adopt exemplary behavior.

Combating Harassment

Gattefossé firmly opposes any form of intimidation, humiliation, threat, violence, and physical, sexual, verbal, or moral harassment.

Employees who believe that their work environment does not comply with these principles are encouraged to report their concerns to the Harassment Referent or the Human Resources Department.

Gattefossé requires its employees to adopt respectful behavior towards their colleagues and external stakeholders.

Encouraging an Inclusive Culture

Diversity is a driver of creativity and performance. Gattefossé develops an inclusive culture based on respect for individuality, allowing everyone to evolve and innovate to contribute to Gattefossé's long-term performance. This commitment permeates all Gattefossé's activities and relationships with its stakeholders, from employees to partners, suppliers, and clients.

Gattefossé supports the development of female talent, raises awareness among its employees about diversity and inclusion, and promotes the professional integration of people with disabilities.

Gattefossé also encourages knowledge sharing through multiple partnerships with the academic and educational sectors.

Gattefossé requires each employee to embody the Group's commitment to inclusion in their daily activities, both internally and in their relationships with partners, suppliers, clients, and other external stakeholders.

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

Ensuring Quality of Life at Work

Gattefossé is committed to promoting the professional development and growth of its employees throughout their careers, as well as ensuring a good quality of life at work.

Well-being at Work

Gattefossé creates conditions that allow its employees to thrive in their roles and develop their full potential. Managers are encouraged to promote collaborative and agile working methods, to mobilize the initiative, skills, and professional responsibilities of their teams.

Each manager ensures the establishment of an environment of trust, constructive dialogue, and recognition of each person's contributions. Gattefossé pays attention to feedback from its employees and social partners.

Respecting Work-Life Balance

Gattefossé ensures respect for the work-life balance of its employees, recognizing that this balance is essential for their well-being and quality of life at work. Gattefossé pays particular attention to the right to disconnect and promote, when the activity allows it, flexible work organization through telecommuting agreements and flexible hours.

Employee Development

Gattefossé supports the development of its employees through training programs and the promotion of internal mobility. Each manager is trained on the company's internal framework, which includes the evaluation and sharing of best practices, the development of behavioral skills, and the pedagogy around personal development tools.

Managers are responsible for creating a respectful and fulfilling work environment, promoting the development actions of their employees, and listening to their concerns, while ensuring a balance between professional and personal life.

Ensuring Health and Safety

Gattefossé considers it its responsibility as an employer to provide a safe and fulfilling work environment for its employees and anyone working on its sites.

Gattefossé ensures the health and safety of its employees, ensures that all its activities comply with health regulations in the countries where it operates, and implements best practices in workplace safety. Gattefossé has established a safety policy based on five pillars:

- Identify issues
- Develop a dedicated action plan
- Deploy and manage the approach
- Engage each employee
- Maintain a virtuous culture for a safe ecosystem

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

Gattefossé protects its employees from exposure to hazardous materials or situations in the course of their professional duties. The internal regulations of the Gattefossé Group detail the rules related to hygiene and safety at work and are communicated to employees.

Each employee of the company has the duty to alert their supervisor or HSE services of any situation they have reasonable grounds to believe poses a serious and imminent danger to the safety of people or the environment, as well as any defect they observe in the protection systems.

Gattefossé requires each employee to engage in the Group's health and safety approach and to pay particular attention to any risky situation.

Business Ethics

Combating Corruption

Gattefossé applies a zero-tolerance policy towards corruption worldwide. Employees must never offer or promise, directly or through third parties, any personal, financial, or other advantage to obtain or maintain a business relationship or other advantages with a third party, whether public or private.

Similarly, they must not accept such advantages in order to grant preferential treatment to a third party. Employees must avoid any activity or behavior that could give the impression of such conduct or arouse suspicion in this regard.

Employees must be aware that offering or granting irregular advantages to influence a decision can result in disciplinary sanctions and criminal prosecution. An irregular advantage can include any item of value intended to favor the recipient, including an employment or service contract for a relative of the recipient.

Employees must also know that certain electoral laws prohibit corporate political contributions to parties or political candidates. Gattefossé's principle is to never make such contributions without the prior approval of the CEO and the Chair of the Board of Directors.

Gattefossé requires its partners and suppliers to respect the same principles and take appropriate measures to prevent, detect, and sanction any act of corruption or influence peddling.

Preventing Conflicts of Interest

A conflict of interest arises when the personal interests of an employee conflict, appear to conflict, or may conflict with those of Gattefossé. These situations must be declared and addressed to eliminate or minimize risks. Each employee must exercise discernment to identify potential conflicts of interest and report them promptly to their hierarchy or the competent services (Human Resources Department, Legal Department).

All employees must perform their duties with integrity and loyalty and immediately report any situation of conflict of interest.

Combating Money Laundering

Money laundering involves concealing the origin of illegally obtained funds to make them appear legitimate. Gattefossé takes appropriate measures in all countries where it operates to prevent

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

its operations from being used for money laundering, notably by refusing cash payments and requiring vigilance from its employees and partners.

Gattefossé asks its employees to strictly adhere to anti-money laundering rules and refuse cash payments.

Respecting International Sanctions

Gattefossé places particular importance on complying with laws and regulations related to international sanctions and export controls, taking into account their evolution. Each Gattefossé operation is subject to particular vigilance to:

Identify any direct or indirect link with countries or regions under international sanctions

Verify that the operation does not involve an entity, organization, or person listed on international sanctions lists

Comply with export control restrictions

Gattefossé requires each employee to exercise particular vigilance to comply with laws and regulations related to international sanctions and export controls.

Antitrust and Fair-Trade Rules

Gattefossé is committed to operating successfully in a competitive environment while respecting legal provisions regarding antitrust, competition, and fair trade.

Employees must always comply with the following rules:

- Commercial policies and prices must be determined independently and never agreed upon with competitors or non-stakeholders, directly or indirectly
- Clients, territories, and markets must never be divided between Gattefossé and its competitors but must result from fair competition
- Clients and suppliers must always be treated fairly

Employees involved in marketing, sales, and purchasing activities, or in regular contact with competitors, must be familiar with applicable competition laws. In case of doubt, they should consult the Legal Department for advice and appropriate training.

Gattefossé requires each employee to strictly adhere to competition rules and exercise particular vigilance in their relationships with competitors, avoiding any behavior that could distort competition rules.

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

Ensuring Confidentiality and Discretion

Gattefossé employees commit to preserving the confidentiality and integrity of non-public internal information. This information may include financial data, strategies, information about employees and clients, know-how, formulas, product developments and launches, as well as potential acquisitions or business activities that provide Gattefossé with a competitive advantage.

Discretion is essential to maintain trust within the Group and in relationships with partners and clients. Gattefossé protects confidential external information communicated to it and uses it only for authorized purposes, with all necessary precautions.

Employees must avoid mentioning internal information through communication means accessible to unauthorized persons or in places where it could be overheard. Employees must also exercise caution regarding their online statements, ensuring that their interventions only represent themselves, exercising moderation, respecting others, and ensuring confidentiality and professional secrecy.

The use of IT resources is subject to the rules and principles detailed in the Gattefossé Group's IT Charter.

Each employee commits not to disclose, directly or indirectly, internal or external confidential information to persons outside the Group or to employees whose functions do not require this knowledge.

Preserving Financial Market Integrity and Preventing Insider Trading

Gattefossé is committed to preserving market integrity and complying with rules aimed at combating market abuse. Gattefossé prohibits communicating false information to the markets or acting to fictitiously influence the price of a financial instrument.

Anyone with "inside information" is prohibited from buying or selling, directly or indirectly, the securities of the issuer concerned (or related financial instruments) as long as this information is not made public and is subject to a reinforced confidentiality obligation.

Employees with "inside information" obtained in the course of their duties within the Gattefossé Group must comply with applicable regulations aimed at preventing insider trading. They must refrain from conducting stock market transactions on the stock concerned and maintain the confidentiality of the information.

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

Respecting Privacy

Gattefossé places great importance on respecting the privacy of its clients and employees, particularly in protecting their personal data. Gattefossé is committed to respecting the fundamental rights of individuals when their data is collected, processed, or transferred, regardless of the territory. Each entity of the Gattefossé Group ensures compliance with all applicable laws and regulations regarding privacy and personal data protection.

Each processing of personal data must be lawful, not infringe on other rights or the human dignity of the person concerned ("principle of legality"). Personal data must be adequate, relevant, and limited to what is necessary, corresponding to the specific purposes of their collection and subsequent processing ("principle of necessity").

The use of personal data must be limited to achieving the purposes for which they were collected, in a manner respectful of the privacy and intimacy of the persons concerned ("principle of proportionality"). The persons concerned must be informed of the processing modalities of their personal data ("principle of transparency") and be able to exercise their control over this data ("principle of respect for the rights of the persons concerned").

Gattefossé requires each employee, regardless of their function, to pay particular attention to respecting privacy and personal data collected and processed in the course of their daily activities.

External Executive Positions and Other External Activities

Gattefossé employees must not engage in external activities that could interfere with their responsibilities at Gattefossé, harm Gattefossé's reputation, or create conflicts of interest. In case of doubt, they should consult the Human Resources Department or the Legal Department.

The following external positions and activities require prior authorization from the Management:

- Member of the Board of Directors
- Executive position
- Employee
- Partner
- Advisor

Authorization will be revoked if the position or activity conflicts with Gattefossé's interests or the employees' responsibilities.

Unless specifically requested by Gattefossé, employees must carry out their external functions and activities at their own expense and risk, during their free time.

Family and Relatives

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

Partners and close family members of employees may be hired as employees or advisors solely based on their qualifications, skills, and experience, provided there is no direct or indirect hierarchical relationship between them. These non-discriminatory hiring principles apply to all professional aspects, including remuneration, promotions, and transfers, even if the personal relationship develops after hiring.

Children of Gattefossé employees may be given priority for internships, training, holiday jobs, and other similar short-term tasks, provided they are as qualified as other candidates.

Business Opportunities

Employees must not compete with Gattefossé or take personal advantage of potential business opportunities identified during their work, unless the company expressly waives its interests in the matter. If an employee wishes to pursue a potential business opportunity personally, they must inform their supervisor, who will decide if the company wishes to assert its interests.

Even if the company decides not to proceed, the employee may only pursue the opportunity in their own name if it does not result in direct or indirect competition with the company's operations.

Fraud, Protection of Gattefossé's Assets, and Accounting

As an ethical company, Gattefossé has a duty to combat fraud. The company ensures that the information in financial and professional documents is accurate and that it conducts its activities with integrity.

Fraud, defined as the use of unfair means to obtain undue advantage or evade the execution of laws, is strictly prohibited at all levels of the company.

Gattefossé's financial data is essential for business management and fulfilling obligations to stakeholders. Therefore, it must be accurate and comply with accounting standards. Employees must preserve Gattefossé's assets and use them correctly and efficiently, protecting them against damage, loss, abuse, theft, fraud, misappropriation, and destruction. This includes tangible and intangible assets, such as trademarks, know-how, confidential information, and information systems.

Gattefossé reserves the right to monitor the use of its assets by employees, including inspecting emails, data, and files on its terminals.

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

Gifts, Business Meals, Entertainment

When receiving or offering gifts or invitations, employees must adhere to principles of transparency with their hierarchy, remain within reasonable limits, and consider the public perception of their actions. They must not be influenced by favors or attempt to influence others irregularly. Reasonable business meals and symbolic gifts are acceptable when circumstances permit. All gifts must have a limited value (threshold of €30), not be paid in cash, and comply with laws and regulations.

Employees cannot accept or offer money, loans, percentages, or other similar monetary advantages.

	CODE OF CONDUCT	
	GATTEFOSSÉ SAS 36 chemin de Genas – CS 70070 69804 SAINT – PRIEST Cedex	Version 02 Last update : 03/2025

Non-Compliance with this Code

Each employee must observe the provisions of this Code of Conduct and seek assistance from their supervisor, the Human Resources Department, or the Legal Department if needed.

It is the individual responsibility of each employee to act with integrity. Any non-compliance with the Code of Conduct may result in disciplinary measures, including termination of employment, and legal or criminal sanctions.

Speak Up

Gattefossé encourages a culture of dialogue and transparency and has therefore implemented an alert system to collect and process reports of violations of laws, regulations, or principles of this Code of Conduct. Any Gattefossé stakeholder (employees, partners, clients, suppliers, etc.) who becomes aware of violations (or risks of violations) of the Code of Conduct or the Gattefossé Responsible Purchasing Charter, as well as applicable laws and regulations, is invited to report their concerns to their contact(s) within the Gattefossé Group or via email:

ethics@gattefosse.com

Any whistleblower (employee or stakeholder) acting selflessly and in good faith regarding facts they have personally witnessed is protected and cannot be sanctioned, dismissed, or subjected to any discriminatory measures, direct or indirect, particularly in terms of remuneration or professional promotion. Gattefossé guarantees the confidentiality of the whistleblower, the facts, and the persons involved.


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