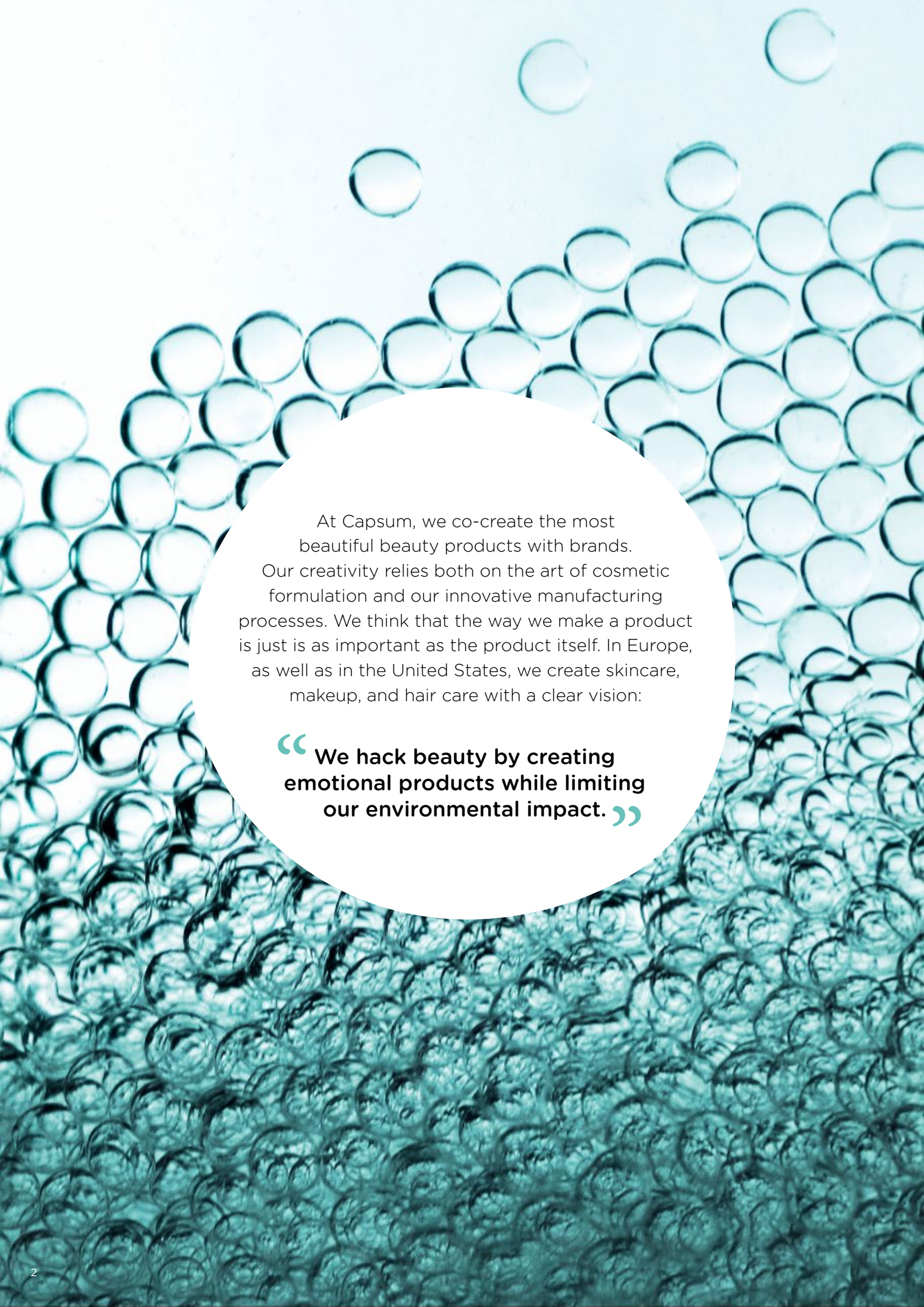


OUR COMMITMENTS FOR A RESPONSIBLE GROWTH

Our Code of Conduct



capsu
m
artisan scientifique



At Capsum, we co-create the most beautiful beauty products with brands. Our creativity relies both on the art of cosmetic formulation and our innovative manufacturing processes. We think that the way we make a product is just as important as the product itself. In Europe, as well as in the United States, we create skincare, makeup, and hair care with a clear vision:

“ We hack beauty by creating emotional products while limiting our environmental impact. ”

MESSAGE FROM SEBASTIEN BARDON

Capsum was born in 2008, and grew within a context of environmental and climate tension, as well as a rapidly changing society: profound changes that impact the working world and company culture.

To grow sustainably in such a context, we at Capsum are convinced of the importance of basing our actions on a solid foundation of values that should guide our practices.

“ *This Code of Conduct is an opportunity to clearly express our commitments to fair and sustainable growth within our company, growth based on respect for the environment and people.* ”



It is our conviction that protecting the planet is everyone's business, and we strive to make the best possible contribution through concrete measures every day. The struggle against climate change is vast. Because these struggles seem major to us, as well as our responsibility, we have chosen our daily battles at Capsum:

- Development of **even more natural formulas**,
- **Reduce CO₂ emissions**, especially by leveraging carbon-free energy,
- **Reduce our consumption of drinking water**,
- **Limit our plastic waste.**

At Capsum, people are at the center, by choice but also by necessity, because our profession as scientific artisans gives prominence to creation and innovation. The well-being of our employees and maintaining the bonds of trust forged with our suppliers and customers are at the heart of our concerns, and are essential for proper company development.

The birthplace of Capsum is Marseille: a city of diversity and blending, like our company. And it is in respect of this diversity, in a healthy and respectful environment, that the employees of Capsum work. They are adventurers of innovation, co-creating daily with our partners and customers in a very special mindset made of innovative ambition, collaboration, and celebration of small and big victories.

We want to uphold these environmental, social, and civic values, to be exemplary in this area. Through this text, we tell all our partners that they are part of our identity, and we tell all our employees that we will respect and support them, that they are our wealth.

This Code of Conduct is an opportunity for new positive momentum, a guide in our commercial and industrial ecosystem, as well as support for our teams.

Sébastien Bardon,
Founder & CEO of Capsum

COMEX ENGAGEMENT

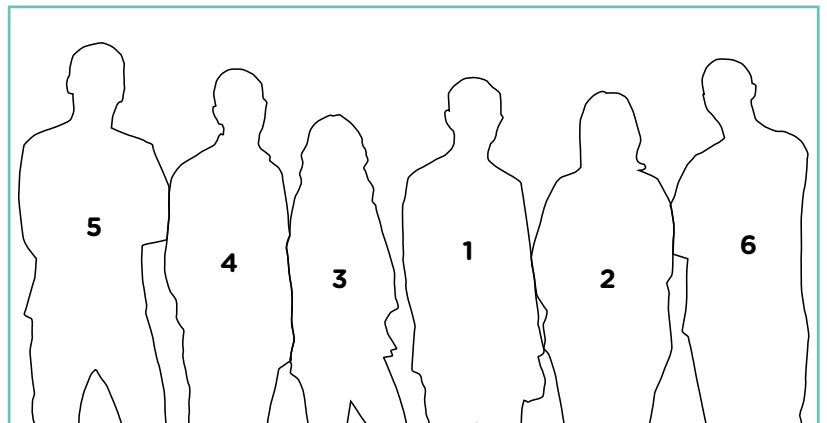


This Code of Conduct is a foundation desired for us all. It represents cementing what we experience daily with our teams, but also as momentum to go farther, a reference that we can use in complex situations, and which will become a constitutive element in our company culture.

Beyond our collective participation for the environment, the well-being of our employees, our reputation, and the value of our brand depend on our behavior, which should be exemplary.

Our ambition is for Capsum to become an inspiring leader, a reference in our industry for our social and environmental responsibility.

We will take action to uphold this Code of Conduct in our daily activities, to promote it in our teams, to clarify it, to make it come to life.



1. SÉBASTIEN BARDON
Founder & CEO

2. CAROLINE BOULLIER
Business Support Director
(Finance, HR, IT)

3. SOPHIE AGAT
Project Development
Director

4. ANTHONY BRIOT
Operations Director

5. CHRISTOPHE AUGIER
Industrialization Director

6. MATHIEU GOUTAYER
New Technology
Platforms Director

10 PROPOSALS OF THE UNITED NATIONS CHARTER

HUMAN RIGHTS

Principal 1: Uphold and respect the protection of international Human Rights law.

Principal 2: Take precautions to not be accomplices in Human Rights violations.

WORK

Principal 3: Respect free association and recognize the right to collective negotiation.

Principal 4: Contribute to the elimination of all forms of forced or compulsory labor.

Principal 5: Contribute to the end of child labor.

Principal 6: Contribute to the end of work supply and job discrimination.

ENVIRONMENT

Principal 7: Practice precaution when faced with problems affecting the environment.

Principal 8: Take initiative to promote greater responsibility when it comes to natural resources/environmental materials.

Principal 9: Favor the development and distribution of environmentally friendly technologies.

ANTI-CORRUPTION

Principal 10: Act against all forms of corruption, including money extortion and bribery.

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on the Environment and Development, and the United Nations Convention against Corruption.

Capsum is a signatory of the United Nations Global Compact. These 10 principals of the UN Global Compact are one of the pillars of this Code of Conduct.

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Preserve natural resources
- Anticipate environmental risks
- Reduce our waste
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Introduction

WHAT IS THE CODE OF CONDUCT?

This Code of Conduct reveals the principles and values of our company. They must be respected in a professional setting by all Capsum employees, as well as all concerned parties.

This Code of Conduct defines behaviors to adopt and attitudes to promote, as well as how to react in a responsible, fair manner in our daily work.

This Code of Conduct is meant to help decision making, resolve conflicts, promote trustworthy relationships, and improve our, as well as our partners', practices.

WHO DOES THIS CODE OF CONDUCT APPLY TO?

This Code of Conduct applies to all of Capsum's employees and partners.

- **All our teams**, in all countries where we have an established presence.
- **The entire Capsum eco-system**, including:
 - Suppliers, consultants, independants, temp workers
 - Interns
 - Secondary staff
 - Seasonal workers
 - Distributors, agents and distributors

We also ask our suppliers to apply standards at least equivalent to ours. These standards are explained in the Suppliers Code of Conduct.



WHO IS RESPONSIBLE FOR IMPLEMENTING THIS CODE OF CONDUCT?

The Code of Conduct must be made known to everyone and respected throughout the company. The Executive Committee (COMEX) plays a key role, and has additional responsibilities. Each Comex member must:

- **Promote** this Code and ensure that it is distributed and understood within his/her team,
- **Guarantee** an environment that encourages people to freely ask questions and express their concerns,
- **Behave** in an exemplary manner that is in line with Capsum's values,
- **Ensure** that this Code is applied and answer questions.

The Business Support department is responsible for supervising this Code. It accompanies teams in its execution, risk evaluation, and in developing policies and guidelines, assuring that trainings in line with this Code are offered to everyone, as well as answering questions.

WHERE CAN ONE FIND THE CODE OF CONDUCT?

A printed version of this Code is distributed to all employees, including new arrivals. Its acceptance is a necessary hiring condition. The Code of Conduct is also available to read or download on:

- **MyCapsum**, Capsum's internal employee website
- **capsum.net**, Capsum's public website

The Suppliers Code of Conduct is also available on capsum.net.



HOW CAN WE ASSURE WE ARE MAKING THE RIGHT DECISION?

The Code is a guide designed to help us deal with most situations in our professional life that could pose ethical problems. However, it cannot foresee all the situations we may face, while exercising our professional activities.

When in doubt about how to react, we must exercise judgment and ask ourselves the following questions:

- Does it comply with the law?
- Does it reflect a good image of me and the company?
- Would I talk about it with a team member?
- Would I be comfortable, if it was made public?

If the response to one of the above questions is “no,” you should not make this decision.

In case of doubt, you should contact the appropriate person by referring to the contact information (“**Asking questions and raising concerns**” on page 36).

COMPLIANCE WITH LAWS AND REGULATIONS

Every one of us, in every entity of Capsum, is expected to follow the laws and regulations of the country in which they work. In case local regulations are stricter than this Code of Conduct, the latter prevails.

Every one of us must know that any violation of laws and regulations may be susceptible to civil sanctions and/or penalties, for the person involved, as well as for the company.

In a professional setting, we must inform our superior in the Business Support department, any Executive Committee member, or send an email to the confidential alert address alert@capsum.eu for any behavior that we consider contrary to applied rules and regulations.



An aerial photograph of a dense, vibrant green forest. A winding river with clear, turquoise water flows through the center of the forest, creating a natural path. The trees are packed closely together, their bright green foliage creating a textured, almost mosaic-like appearance. The lighting is bright, highlighting the various shades of green and the ripples on the water's surface.

1.
*Our commitment
to the planet*

PROTECT THE ENVIRONMENT PRESERVE NATURAL RESOURCES

At Capsum, we believe in corporate responsibility and the essential role that businesses play in the battle for a more sustainable world. Preserving natural resources and reducing our environmental impact are, and must be, priorities for each of us.

This commitment is found at each stage of the production process, which is regularly analyzed and reviewed from an environmental protection point of view, whether through the formulas that we offer to our customers—always more natural, always more concerned about the environmental impact, or the packaging—for our own collections and for co-developments with our customers. The same is true of the activities and practices in each company department.

In particular, the use of drinking water in our factories has become a key indicator, for which we are setting ourselves increasingly ambitious reduction targets.

It is up to all of us, in our respective roles, to respect and positively develop this environmental policy, not only by complying with regulations, but also, by going further.

WE CONSIDER THAT

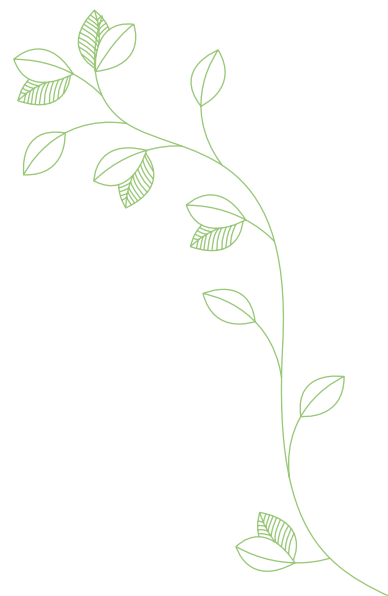
- Limiting our impact on the environment is important for the sustainability of our society
- Being a responsible company also improves our image and promotes business opportunities
- We must be in a continuous improvement process about environmental issues

WE COMMIT OURSELVES TO

- **Respect** all regulations and follow their evolutions
- **Control** environmental parameters and make them available as indicators
- **Produce** a CSR report every year including these indicators in total transparency
- **Follow** environmental developments, to identify the best practices in our sector and inspire ourselves
- **Collect** good ideas from everyone, analyze them and put them into practice as much as possible.

ENVIRONMENTAL INDICATORS

Capsum's indicators and their evolution are shared and available to everyone on **MyCapsum**. Thus, we can measure the results of our efforts.



ANTICIPATE ENVIRONMENTAL RISKS

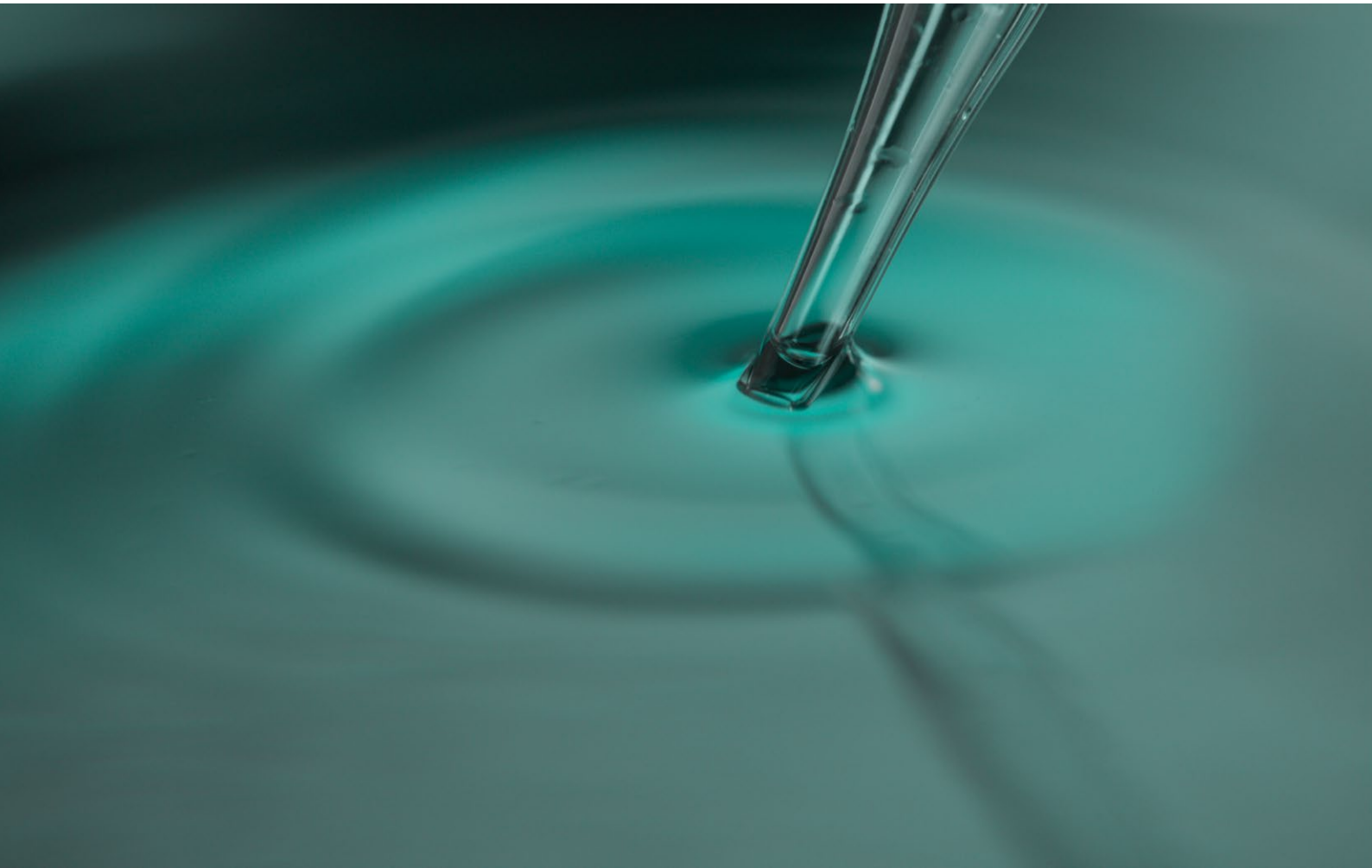
Capsum is committed to preventing the impact of its activities on the environment, in order to avoid any harmful repercussions. Because the potential consequences of an environmental risk are significant: damage to nature, or to the health of our employees and our neighbors, financial losses, legal sanctions, or even the deterioration of Capsum's image. Necessary vigilance first applies to our production teams, but also to the entire company.

OUR COMMITMENTS

- For each **new manufacturing process**, or **process modification**, environmental risks are evaluated, and **prevention measures** are established, if necessary.
- **We control** our environmental settings.
- **We explain** and enforce the procedures for moving materials that are hazardous for humans and for the environment.
- **We treat** our waste in accordance to how dangerous they are.

WHAT IS AN ENVIRONMENTAL RISK?

An environmental risk represents the possible occurrence of incidents or accidents generated by company activity liable to cause harmful and significant repercussions for the environment. This can materialize as water, air, soil, or underground pollution, or even the underground water beneath the site.



REDUCE OUR WASTE

Convinced of the importance of this issue for environmental protection, **we made reducing our waste, plastic in particular, a priority** at Capsum, in the manufacturing processes of our products as well as in our day-to-day professional environment.

Each outflow is tracked, sorted, and measured. In each department, in R&D as in manufacturing, questioning reutilization is systematic. For our own collections, using plastic in packaging and shipping is reduced to a minimum: Capsum wants to be exemplary.

Sorting has been implemented in our offices, and thanks to employees' proposals, many actions to limit our waste are being carried out. At Capsum, we all feel concerned about waste reduction.

OUR COMMITMENTS



Be exemplary for the packaging of our collections.



Listen to employees' propositions to reduce our waste even further.



Train and inform all of our employees about recycling. Recycle everything that can be.



Monitor and report on each waste stream.



Manage waste at its source and take it into account in our purchasing policy.



Keep constant watch on best practices.

EVERYONE INVOLVED

If you have an idea, you can propose it. An idea box is available in the main break room of each Capsum site. A number of ideas were brought to life, thanks to team members' proposals: mugs, carpooling, water bottles, reusable silverware. Lots more are to be imagined!



ENERGY AND CO₂

Capsum aims to be a model energy company, and is committed to reducing its carbon footprint. For this, we have identified two priorities:

- controlling our energy consumption on the one hand,
- using non-carbon energy sources on the other hand.

These two subjects are at the heart of Capsum's concerns on each of its sites.

WE CONSIDER THAT

- Energy is precious, regardless its financial cost.
- Saving energy is good for the planet, as well as for Capsum.



OUR COMMITMENTS



Systematically use non-carbon electricity for all of our sites, every time possible.



Integrate decarbonated energy production into our building projects.



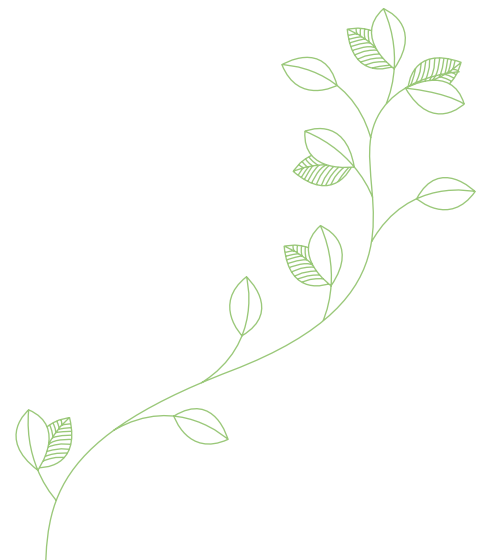
Limit our plane trips as much as possible. We use public transportation as much as possible, and we take the train rather than fly on trips of equal distance.



Compensate the CO₂ emissions of our flights.

CHOOSE OUR MODE OF TRANSPORTATION

To guide Capsumians in their choices, while respecting Capsum's engagements, a note about business travel is available on **MyCapsum**.



RESPONSIBLE MARKETING

Aware of the necessary evolution of our market, we strive to offer and promote eco-designed products, and all our marketing operations are focused on products and services that are more respectful of the environment and people.

OUR PRIORITIES

- **Develop a more responsible offer through:**

- our choice of raw materials, which favor naturality
- our engagement to not test any formula on animals
- our vigilance about work conditions, linked to their fabrication (ex. *Responsible Mica certification Initiative* or RSPO)
- the promotion of more virtuous packaging, in terms of recyclability and reduction
- the attention given to sharing this offer with our clients (contractor - cosmetics brand) with packaging reduced in weight and space, made with FSC cardboard.

Le label du Forest Stewardship Council garantit aux consommateurs que leurs produits en bois ou issus du bois proviennent de forêts aménagées de façon durable.



- **Encourage our customers** to develop products that are more respectful, as well as in line with the growing expectations of consumers: for formulas, for example, we send our customers a quote based on market-recognized standards, such as ISO 16128, EWG and Clean at Sephora.

These fundamental environmental and social values are expressed both in our developed products and our own collections.





2.
*Our commitment
to society*

HUMAN RIGHTS AND LABOR LAW

As a responsible, engaged company, Capsum is committed to respecting Human Rights in the context of its activities and its commercial relations and to guarantee the development of its employees in a healthy and respectful working environment, throughout the world. We adhere to the principles established in the Universal Declaration of Human Rights, the fundamental conventions of the International Labor Organization (ILO) and the United Nations Global Compact, which we have ratified.

**NOUS SOUTENONS
LE PACTE MONDIAL**



WE CONSIDER THAT

- All forms of modern **slavery**, including forced labor and human trafficking, are prohibited.
- All forms of **child labor** under the minimum age defined by ILO standards are prohibited.
- Everyone's **right of association** (trade unions, political affiliation, etc.) must be respected.
- **Salaries** must be at least equal to the legal minimum wage in the country in question.
- Our suppliers must apply standards at least equivalent to ours.

OUR COMMITMENTS

- We must know and respect all applicable laws and regulations in terms of Labor Law.
- Any behavior that goes against the fundamental rights of individuals must be reported to our supervisor or to the Business Support Department.

We can also contact:

- > Capsum's confidential alert address alert@capsum.eu.
- > Any COMEX member.

THE INTERNATIONAL LABOR ORGANIZATION (ILO)

Environmental risk represents the possibility of incidents or accidents generated by the activity of a company that can have harmful and significant repercussions on the environment. This can create pollution in the water, air, soil, basements, or even our groundwater.

The 4 fundamental principles and workers' rights of the ILO

- freedom of association and effective recognition of the right to collective bargaining
- elimination of all forms of forced or compulsory labor
- effective abolition of child labor
- elimination of discrimination, in respect to employment and occupation.

FINANCIAL TRANSPARENCY

Accurate and reliable financial reports are essential for the integrity of our business, current and future performance, and for making sound strategic decisions. It is therefore essential that our statements accurately reflect the activities of the company, in accordance with national and international accounting standards.

OUR ENGAGEMENTS

- Capsum accounting records, accounts and financial statements must comply with legal requirements and accurately reflect Capsum operations.
- Internal controls, as well as external audits, ensure the accuracy of our accounts. They allow us to remain vigilant about fraud and money laundering risks.
- In case of doubt, we must inform our supervisors.

EVERYONE'S VIGILANCE

"I don't work in the Finance Department. Is the accuracy of financial reports my responsibility?"

Yes, financial accuracy is everyone's responsibility. From expense reports to invoices received by suppliers, we all need to make sure transactions are accurate, complete and properly recorded.

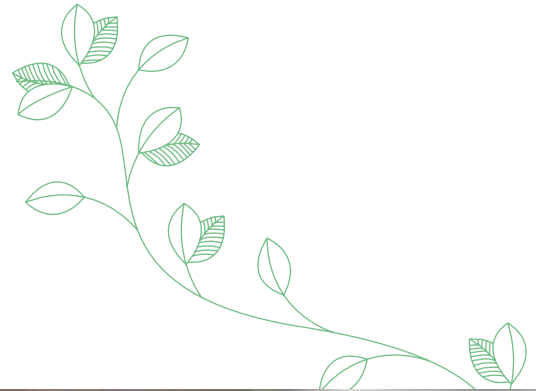


INTERNATIONAL SALES AND TRADE

The sale of products and services, imported or exported, is subject to specific regulations. **Capsum complies with all applicable international trade laws**, in accordance with our values and applicable international standards, including the United Nations and European Union trade embargoes and sanctions.

We also comply with all **laws and regulations specific to chemicals**.

Transparent business practices and the application of customs regulations ensure long-lasting and respectful relations with our business partners.





3.

Our commitment
to a healthy and
sustainable
ecosystem

OUR ECOSYSTEM

If Capsum were a living being, its ecosystem would be made up of its suppliers, customers, subcontractors, temporary workers, consultants, local communities, etc. In short, anyone who exchanges financial, work, product and service flows with Capsum.

It seems essential to us to establish **relations with them based on trust and transparency**. For them, we want to be irreproachable in our practices, continue to grow every day with them through the establishment of exemplary procedures and standards. Together, we want to fight against fraud, corruption, or conflicts of interest.

COMBAT FRAUD

Fraud is inadmissible, whatever its form. Each Capsum employee, as well as any third party acting on behalf of Capsum, must contribute to preventing fraud.

Internal procedures were set up to combat fraud. Here, managers have a key role in upholding procedures, detecting and preventing fraud.

But, whether employees or partners of Capsum, we can all be brought to witness embezzlement, and it is our responsibility to notify the contact persons. Any proven or suspected fraud must be reported to our supervisor, to the Business Support department, to any member of the Executive Committee or to the address alert@capsum.eu.

SOME EXAMPLES OF FRAUD (NON-EXHAUSTIVE LIST)

- physical theft of Capsum property
- physical theft of products manufactured by Capsum or entrusted by our customers, even if they have been scrapped
- falsification of receipts or expense reports
- forgery or modification of financial accounts
- embezzlement of funds, securities or other assets
- money laundering
- misappropriation
- overbilling a supplier and obtaining a personal payment in return
- disclosure of confidential information to external stakeholders
- corruption
- etc.

PRACTICAL CASE



A product has been thrown in the trash; can I take it?

No, for several reasons:

- The first is that our trash cans belong to us, and it would be theft.
- The second is that the product may be subject to a confidentiality agreement, and taking it outside company walls would betray our customers.

COMBAT CORRUPTION

Capsum is committed to fighting corruption and influence peddling in all its forms, in its relations with public and private actors.

Beyond essential law enforcement, a zero-tolerance policy protects our reputation and allows us to develop relationships based on trust with our stakeholders.

Definitions

Corruption includes promising, offering, giving, receiving or accepting to receive anything of value, directly or indirectly, with the aim of obtaining an illegitimate advantage or influencing a decision.

Informal payments are payments made fraudulently to facilitate or speed up procedures, or to access services to which the payer is legally entitled.

Capsum employees and partners must commit daily to refusing certain practices:

- We must not offer, promise or bribe, whatever the sum, directly or through an intermediary, to a private sector interlocutor or to a public official.
- We should neither accept nor receive any form of bribe, regardless of its amount and origin.
- We do not make or receive informal payments.

GIFTS AND INVITATIONS



Gifts and invitations are tools designed to reinforce relationships. However, they must never influence our decisions, or be given with the intent of influencing stakeholders' decisions.

We must then prove discernment and moderation to assure that the frequency and value remain reasonable.

- **We must avoid** any gift or invitation involved in a negotiation process or request for proposals.
- **We must never ask** for a gift or an invitation.

- If the gift is an **amount of money in cash, it's a bribe**, regardless the amount.

Questions about gifts and invitations can quickly lead to embarrassing situations. If we ask ourselves about the pertinence of a gift or invitation, it's perhaps is it time to talk about it.

We should contact our superior or the Business Support Department with the slightest doubt.

PRACTICAL CASE

“Can I accept a business lunch paid by a supplier?”

- In most cases, business lunches that are modest and infrequent are acceptable. However, while a supplier is paying for a lunch, you should always ask yourself if these exceptional circumstances could compromise your impartiality, or if they seem to compromise your impartiality with others.
- If lunch is offered during contract renegotiations, you should always refuse the invitation.

“What types of gifts are considered to be of small value?”

- Gifts like tote bags, pens, notebooks, T-shirts, hats or other promotional items are generally considered to be of modest value.

The Social and Economic Committee (CSE in French) collects gifts and redistribute them in an annual raffle.

POLITICAL ACTIVITIES AND LOBBYING

Capsum does not finance or render services to any political party, not to any candidate for an election or for an official office. We respect everyone’s right to contribute to the political process and to participate in political activities, as long as the employee does not represent Capsum in that capacity.

- Capsum does not make political donations of any form, either directly or indirectly.
- Everyone is free to become a member of a political party and can make donations to political parties, as long as this activity remains in the private sphere, is practiced in the employee’s free time, does not entail any situation that could be considered a conflict of interest, and is not considered lobbying.
- Personal political opinions and donations do not, in any way, reflect the values of the company, whether directly or indirectly.
- Politically involved people can only collaborate with Capsum in carefully managed situations.

PRACTICAL CASE

“My brother is running for a local election, and I would like to help him campaign. Can I do it?”

Your political activity is a private matter. However, you should make sure that you are not using Capsum’s name and resources for this campaign. For example, you cannot use the Capsum brand or your work email address, and you must not spend time on this campaign during work hours.



CONFLICTS OF INTEREST

Every Capsum employee must make decisions that serve the best interests of the company. A conflict of interest may arise when personal interests conflict, or might conflict, with our professional duties or the interests of Capsum. Real or perceived conflicts of interest can also tarnish Capsum's image.

A conflict of interest is not a fault in itself. **The fault is not treating it.**

- Conflicts of interest should be avoided at all times.
- Conflicts of interest must be reported as soon as possible to be dealt with by our supervisor or the Business Support Department.
- Managers and management must ensure that each conflict of interest reported is treated effectively.
- Any employee, whether new or changing position, must report any personal interest in any employee, client, intermediary or public official working with the company.
- Third parties acting on behalf of Capsum must report any conflict of interest.

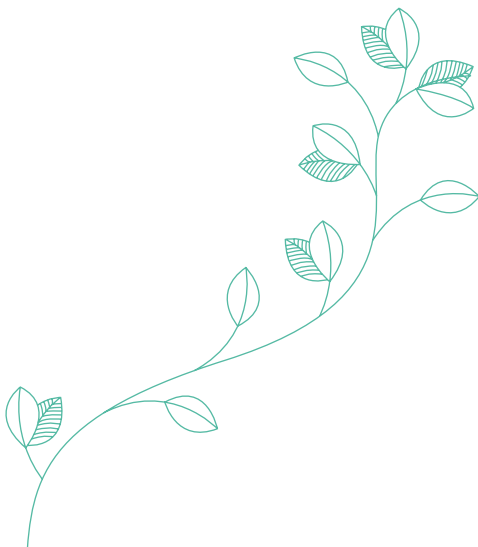
QUICK TEST

- *Is there a possible conflict of interest?*
- *Will I feel indebted to someone?*
- *Could my professional judgment be compromised?*
- *Would that give the impression that my professional judgment is compromised?*

If the answer is «yes» to any of these questions, **we may be in a conflict-of-interest situation.** We need to discuss the matter with our manager or the Business Support Department.

EXAMPLES OF PROBLEMATIC SITUATIONS

- An employee has a close family / friendship tie with one of our suppliers, and he/she is responsible for the relationship with this supplier at Capsum.
- An employee uses his situation or status at Capsum to indirectly influence the decision to purchase goods or supplies from a business in which a close relation has direct financial interest.
- An employee is close to a Capsum competitor.



RELATIONS WITH OUR SUPPLIERS AND PARTNERS

We are enriched by the connections we make. **Our suppliers are a key element in the quality of our products and in our ability to innovate.** Our wish is to grow with them, in trust and respect, and in positive interdependence, so that our image is mutually embellished.

This is why we dedicated a Supplier Code of Conduct for them. We ask them to sign it and commit with us.

WHAT WE EXPECT

- **A strong and clear commitment**, with standards at least equivalent to ours.
- **Commercial relations based on trust and respect.**

OUR COMMITMENTS



Receive suppliers courteously, even if their products and services are not suited to our needs.

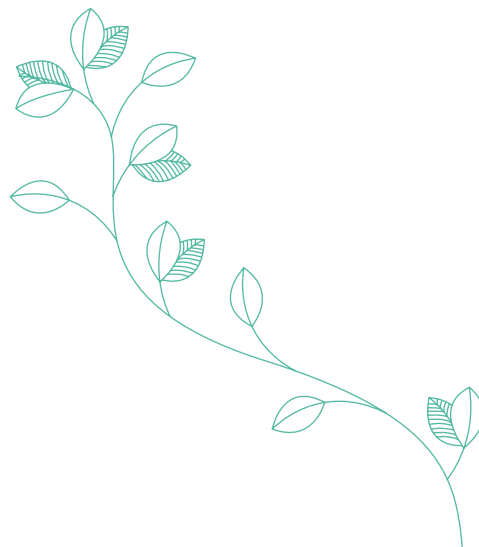


Incorporate the principles of this Code of Conduct into the selection process. Favor suppliers who respect the environment and exhibit exemplary social practices.

THE SUPPLIER CODE OF CONDUCT

As part of our approach, we have written a code of conduct for our suppliers, based on the principles of the United Nations Global Compact and conventions of the International Labor Organization (ILO). This Code of Conduct allows us **to build a long-term relationship with our partners by creating sustainable growth.**

For everyone, this document supplements numerous regulations, standards and laws in force in the various countries. Suppliers also accept to comply with these regulations, standards and laws in the countries in which they operate. Capsum suppliers are required to follow and communicate this Code of Conduct to all of their employees working with us.





4.
*Our commitments
as an employer*

HEALTH, WELL-BEING AND SAFETY AT WORK

Our employees are our No. 1 asset, and protecting them is our duty. Their health impacts their creativity and their capacity to work. Therefore, together, we must minimize and prevent work-related risks, accidents and illnesses. Our primary prevention tools are training and information.

When it comes to well-being, our goal and responsibility are to maintain **a healthy and fulfilling work environment**, in which our employees can express their potential, achieve their goals and create.

WE CONSIDER THAT

- All employees have the right to work in a healthy environment that takes their well-being into account.
- We must remain vigilant in order to identify all risks, prevent them and raise awareness among those exposed.
- Health is physical, but also mental, and fighting against harassment and discrimination contributes to the health of our employees.
- Everyone must get involved, individually and collectively.
- Employees and third parties must obey the rules.

If we encounter difficulties at work, or if we believe that our work environment has a negative impact on our well-being or our health, we should discuss it with our manager, a representative of the Business Support Department, or an Executive Committee member.

SECURITY FLASH

Approximately ten "Safety Flashes" are distributed by the Safety, Health and Environment department each year. They are generally slightly targeted, and used to remind us about rules or to review an incident. Don't miss them!

WE COMMIT OURSELVES TO

- **Comply** with all laws and regulations related to occupational health and safety.
- **Train** all our employees and temporary workers working for Capsum on work safety.
- **Report and analyze** each accident, illness or incident, and take necessary measures to prevent them from recurring.
- **Provide** all the necessary PPE* for employees, temporary workers and visitors.
- **Encourage** employees' proposals concerning their job, analyze them and implement them according to their relevance.
- **Make security information regularly available** to all employees, including safety tutorials.
- **Contribute** to safety through clear displays in critical locations, especially in production areas.

PRACTICAL CASE

I have to bring a visitor to our manufacturing area, and I cannot find PPE. Can I still take the tour?*

No, in this case, all you have to do is contact the Safety, Health and Environment department, and they will provide you with the necessary equipment.

*PPE: Personal Protective Equipment

DIVERSITY AND NON-DISCRIMINATION

Capsum's historic headquarters are in Marseille, a city of mixed diversity. We are proud that this diversity is naturally found among our employees. For us, **everyone should have the same opportunities** to succeed, **and every contribution should be valued**. Discrimination, whatever its form, is not and will never be tolerated at Capsum.

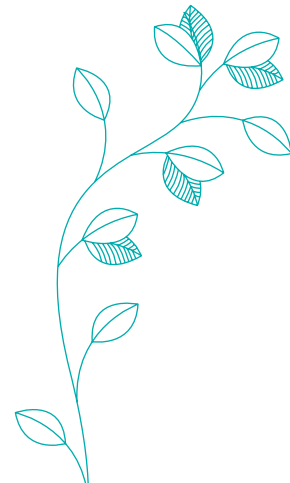
Our priority is to provide a healthy working environment, in which everyone can learn, develop, progress and contribute to the growth of Capsum and be recognized for it. We also ensure non-discrimination in our business relationships.

WE CONSIDER THAT

- Our **diversity** stimulates creativity, fosters collaboration, increases performance and is an asset for all of us. It helps us better understand the world, and supports activity growth. It enriches us.
- All employees and third parties have the right to be treated with the same level of **respect and dignity**, regardless of their ethnicity, nationality, gender, religion, age, professional experience, political opinion, disability, ability, medical situation, sexual orientation or cultural difference.
- Capsum's recruitment, training and promotion processes are based solely on qualifications, skills, achievements and performance.

OUR COMMITMENTS

- **Respect** labor laws. Discrimination is a crime.
- **Contribute** to maintaining a trustworthy environment.
- **Interact** with everyone with respect at all times.



WE@CAPSUM



MORAL AND SEXUAL HARASSMENT

At Capsum, we want work to be fun. Whether moral or sexual, harassment is a major risk and a real issue that we do not tolerate, and we are committed to strongly fight against it. We give harassment a broad definition, including any unwanted verbal, visual or physical behavior, or any other behavior that creates a threatening, shocking or hostile work environment. We also include lack of recognition as a potential starting point for harassment.

In a harassment situation, the longer time passes, the more suffering accumulates. Whether you are a victim or witness to such a situation, it must be reported and responded to quickly, so that action can be taken as quickly as possible.

WE CONSIDER THAT

- All employees must be protected from all forms of persecution and harassment.
- All forms of harassment are prohibited. This includes, but is not limited to: racism, sexism, homophobia, sexual harassment, as well as intimidating or threatening behavior.

WE MUST



Comply with all laws and regulations that prohibit harassment.



Not tolerate any form of harassment, neither for ourselves nor for our colleagues, in the company and our professional relations.



Inform our manager or the harassment referent of the CSE at the following address:

cse@capsum.eu

or the confidential alert address

alert@capsum.eu

which can also receive reports.

THE FIGHT AGAINST HARASSMENT STARTS WITH LISTENING

While there are clear and easily detectable forms of harassment (verbal abuse, humiliation, racism, sexism), other forms are less obvious. If a person expresses that they feel harassed, the behavior in question should be stopped immediately, regardless of our opinion of the situation.

BALANCING PERSONAL AND PROFESSIONAL LIFE

At Capsum, we know that **establishing and maintaining a healthy work-life balance is essential. This contributes to our well-being and our work performance.** Employees have a life outside of work, with commitments, responsibilities and obligations, and it is important that professional life does not encroach on this precious and essential time. We are committed to ensuring that employees have all the cards in hand to achieve their goals at work, while respecting their personal commitments.

This chapter of the Code of Conduct particularly concerns managers, who must ensure that a balance is respected within their team.

WE CONSIDER THAT

- All employees have the right to maintain a rewarding personal life outside of work.
- Employees' workload must not have an inadequate impact on their lives and personal commitments.
- The work-life balance of each employee must be respected.

OUR BEST PRACTICES

- In **managing our time**, we must ensure that we establish and maintain a healthy balance between our personal and professional obligations.
- **We must limit** business communications to a reasonable use outside of working hours. E-mails, phone calls or phone messages outside of work should be limited to emergencies and exceptional situations.
- **If we or those close to us** feel that our workload at Capsum is having a negative impact on our ability to invest sufficient time in our personal life, we should speak to our manager or a Business Support representative.

WORK HOURS

We do our best to adapt our hours to our clients. If our clients depend on another time zone than ours, our agenda can be adjusted to meet our personal and professional life balance. In all cases of this, you must talk with your manager.

PROTECTION OF COMPANY PROPERTY

Capsum's most valuable asset is its employees. Then come its **know-how**, its **patents**, its **image** and **reputation**, its **brand**, its **material and intangible assets**, its **production capacity**, its **financial assets**, etc.

We must protect these assets from loss, damage, misuse and theft.

Our rights and duties regarding the responsible use of Information and Communication Technologies (ICT) are defined in a specific document, called the IT Charter, listed in the reference documents at the end of this Code, which is available to all employees on [MyCapsum](#).

REMEMBER THAT

- «Support» goods (software and computer programs, telephones and smartphones, laptops, office equipment and supplies, company vehicles, machines and tools, etc.) are intended for professional use.
- Each of us is responsible, within the framework of his function, for the proper use and protection of the material and intangible assets of the company.
- We must limit the use of ICT tools, especially e-mail systems and the Internet, to professional uses. Personal use of these tools is tolerated, if it is exceptional and rare.
- We are committed to never use ICT in a way that could damage the system, the IT network, the interests of the company, our customers or other stakeholders.
- Our passwords must be kept confidential.

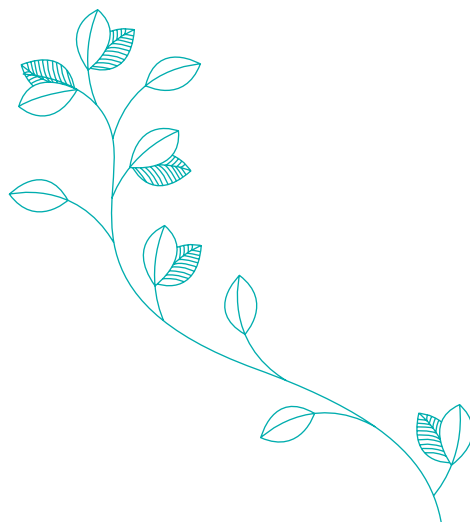
PHISHING / HACKING VIGILANCE

Fraudulent email attempts to recover personal and professional data are misleading.

Here are tips to avoid being phished:

- Before opening an email, always check the sender's address. Fraud can be subtle, such as an email address similar to that of internal or external collaborators.
- Do not click on a link or download an attachment without being sure about its content and origin.
- In case of doubt or proven fraud, forward the email to the address it@capsum.eu

Let's test our vigilance via our IT trainings.



CONFIDENTIALITY

Information is part of our most precious assets. Capsum acts to protect this information, whether this information belongs to us or to another society: This is essential to our success, our reputation and our longevity. Social media is becoming more important, and we are conscious that these networks can be useful tools to communicate with our stakeholders. However, we must use these tools with caution.

We must not share confidential information with any person, other than the desired recipient, unless we have prior authorization from the owner or we are legally obliged. In case of doubt, we must ask our manager.

Information given by our suppliers, clients and partners must not be revealed without prior authorization.

We must follow all necessary steps, in order to prevent misuse or accidental disclosure of confidential information. This means acting discreetly in public places, keeping confidential information in secured places, and taking all necessary precautions when sending, copying or destroying documents or information.

To protect confidential information, it is essential to adopt these standards, in both personal and professional settings, while using the Internet or social media.

OUR RESPONSIBILITIES

- **We must not divulge** confidential information.
- **We must respect** all confidentiality agreements between the company and our partners.
- **We must protect** all information from accidental disclosure or modification even after leaving the company.
- **We must use** social media responsibly, even outside of work.
- **We must not use** company information without permission (for example, photos or videos of our offices).
- **We must always distinguish** between business and personal communication.
- **We must assure** that time spent on social media for personal reasons does not impact our work.

WHAT ARE WE TALKING ABOUT?

Confidential information includes, but is not limited to:

- financial, legal and economic information relating to the company or its partners,
- the strategy of the company and its partners (projects, acquisitions, marketing and sales forecasts, purchasing strategy, etc.),
- production capacities,
- manufacturing secrets and know-how,
- information relating to research and product developments in progress,
- information concerning customers, suppliers and partners,
- unpublished patents,
- specific software,
- personal information about employees.

CONFIDENTIALITY AGREEMENTS

Capsum signs a document called NDA (Non-Disclosure Agreement) with each prospect and client. This agreement protects both parties who exchange and share confidential information about their technologies, projects, strategy, etc.

Signed company-wide, it covers and commits ALL Capsum employees to respecting this confidentiality.

PRACTICAL CASES

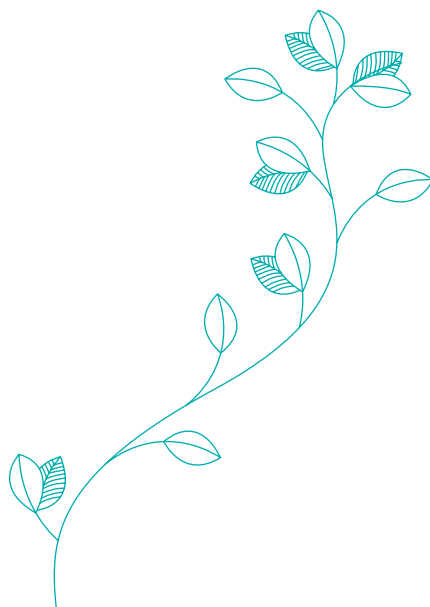
I have a habit of posting positive pictures on social media. Can I post a photo of a product that I find beautiful?

- **No, you cannot.** We are committed to strict confidentiality with our customers. We often work on the development of products not yet available for sale, and any communication relating to these products, even informal, is strictly prohibited. A photo on a social network can be seriously damaging to Capsum.

I'm on the train with another Capsumian, can I talk about strategy, projects or structure?

- **It is a public place.** I must, therefore, act as if my word were public, and be careful not to say anything that could jeopardize confidentiality.

Tips: use writing, replace names with initials, etc.



PRIVACY AND PERSONAL DATA

Everyone deserves the right to privacy. Capsum is committed to respecting the confidential information of its employees, business partners and other stakeholders and to protecting their personal data.

Capsum respects the laws of the countries in which it is established.

OUR COMMITMENTS

- Everyone has the right to control the collection, processing, use and dissemination of their personal data.
- The latter must be used in a fair manner for specific, explicit and legitimate purposes, and must be kept only for the time necessary for processing purposes.
- Each person must be informed about the collection of their personal data, how it will be used and who to contact, in case of questions.
- Capsum does not communicate any personal data to third parties, except as required by applicable laws and regulations.

OUR RESPONSIBILITIES



We must respect everyone's privacy.



We must ensure the confidentiality of our business partners' information.



We must collect, use, process, transfer and store the personal data of our colleagues and that of our business partners, in accordance with internal personal data protection policies and applicable laws.



In case of doubt or request, we should contact the Data Protection Officer at dpo@capsum.eu.

PERSONAL DATA

«Personal data» refers to **any information relating to an identified or physically identifiable person**. A physically identifiable person is a person who can be identified, directly or indirectly, by means of his/her name, his/her identification number, his/her address, his/her computer identifiers, or any other element specific to the physical or physiological identity, genetic, mental, economic, cultural or social of this natural person. For example, their name, date of birth, social security number, photograph, email address, computer ID number, etc.

BEHAVIOR GUIDELINES

TO DO

- Collect personal data necessary for legitimate and commercial purposes, and then archive and delete personal data, if it is no longer useful.
- Password protect or encrypt documents containing personal data, when transferred to authorized third parties.
- Lock your computer when out of the office and change your password when requested.
- Securely delete any document containing personal data.
- Limit the number of data extraction files.

NOT TO DO

- Keep personal data because you think it will be useful for future projects.
- Disclose personal data to unauthorized person, or send sensitive documents by email without password.
- Leave personal data on a printer or on a shared server.
- Store or transfer business documents on personal devices (phones, laptops).
- Share your passwords.

FREEDOM TO JOIN TRADE UNIONS

Capsum recognizes the right of its employees to meet, organize and join the union of their choice, as well as the right to collective bargaining. Capsum respects labor law in each location, and the important role of staff representative institutions: the Economic and Social Committee (CSE in French).

WE CONSIDER THAT

- The members of the CSE have legitimacy of action
- Collective bargaining is at the center of social dialogue
- Union membership is free for each employee

OUR ENGAGEMENTS

- The CSE is consulted on essential topics, such as employees' working conditions
- The CSE has access to company information, in accordance with the law, to execute its representative actions.
- The members of the CSE will not be subjected to any discrimination, threats or intimidation linked to their membership or status as staff representative.

The company believes that freedom of association and expression relies, to a large extent, on the recognition of representatives elected by employees and their roles. The company recognizes their legitimacy in the company, and ensures that all employees have the opportunity to exercise their rights to freedom of association, under local laws.

RAISING QUESTIONS AND CONCERNS]

Employees, any third party acting on behalf of Capsum and any other stakeholder are encouraged to ask questions or raise concerns. This will allow Capsum to avoid harm to both the company and the employees.

WHAT SITUATIONS CAN BE REPORTED?

Any situation and violation, whether actual or suspected, of the Code of Conduct, company regulations or applicable laws can be reported. When in doubt, reporting helps alleviate fears.

If a problematic situation is reported by a person involved, Capsum welcomes it with kindness. The right to make mistakes is one of Capsum's fundamental principles, and it will be applied in this case as well.

TO WHO REPORT A SITUATION?

In most cases, **your manager** should be your first point of contact. He / She is probably the best person to understand your concern and take action, if necessary.

The **Business Support Department** is also available to answer questions, advise, support.

If we do not feel comfortable sharing our concerns with our manager or with the Business Support Department, or if we have already shared our concerns and believe that no appropriate response is offered, we can contact:

- Capsum's **confidential alert address**: alert@capsum.eu
- **Any COMEX member**

We realize that it takes courage to share your concerns.

Capsum will not tolerate any form of retaliation against any employee or third party acting on behalf of Capsum who reports, in good faith, a proven or suspected violation of the Code of Conduct or applicable laws.



REFERENCE DOCUMENTS

- United Nations Charter
 - IT Charter
- Supplier Code of Conduct
 - CSR Reports
 - 1998 ILO Declaration





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