



# Code of Conduct



SEPTEMBER  
2023



Photo : Didier Delmas

# Values

## Our values guide our actions

**Integrity:** We are honest, open and fair, and we demand an environment where everyone feels respected, included and heard.

**Ingenuity:** We dream big and create clever, simple, yet bold solutions for our consumers, customers and teams.

**Responsibility:** We make courageous and timely decisions and deliver ambitious results that delight our consumers across the world.

**Sustainability:** We drive sustainable growth while making meaningful contributions to our team members, communities and the world.

**Simplicity:** We believe that simple solutions are often the best solutions, when facing complexity, we respond with clarity.

**Teamwork:** We set high standards, trust each other and work together across boundaries, holding ourselves and each other accountable.



# To all our Team Members, To all our Partners,

Our company was founded on the exemplary reputation of our founder Marcel Bich and on our values, such as integrity, honesty and continued respect for the rule of law.

The Executive Committee and Senior Management consider that the success of a company like ours depends on the respect of the strongest ethical standards and principles. We act responsibly and sustainably in everything we do. We are committed to protecting our planet and doing our best to be fair to society and throughout the supply chain, keeping future generations in mind.

Our values govern our actions, which are guided by respect for the law, and we do not tolerate any intentional violation of the law.

We create and maintain relationships with all our stakeholders – team members, customers, suppliers, shareholders and regulators – based on the highest standards of conduct and behavior globally.

Regardless of their role, seniority or location, all our team members are required, at all times, to comply with applicable law, regulations and industry standards as well as this Code, our policies and processes in the performance of their professional activities.

This Code is part of the compliance program built in accordance with Law No.

2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernization of economic life (the so-called “Sapin II Law”) and Law No. 2017-399 of March 27, 2017 on the duty of vigilance of

parent companies and ordering companies (the so-called «Duty of Vigilance Act») to which we are subject globally.

Please take the time to read and understand this Code so that, with the support of your line manager and your Legal and/or Compliance Officer, you understand your individual responsibilities and know who to ask for help.

Your opinion is important, and we will always be there to listen to you and act.

Read this Code, live it, pass it on, respect it and make sure it is respected around you.

For more information, refer to your Legal and/or Compliance Teams at:

*Email* : [SpeakUp@bicworld.com](mailto:SpeakUp@bicworld.com)

*Website* : [BIC SpeakUp](http://BIC SpeakUp)

# **BIC**® Executive Team



Gonzalez   Francis   Murray   Chad   Ethan  
Sara   Elizabeth   Gary   Ann   Thomas

## What do we expect of you?

- To familiarize yourself with the content of this Code and fully adopt it
- To reject any attitude or behavior contrary to the Code
- To act our values consistently
- To act as a unified OneBIC
- To not hesitate to solicit your Legal and/or Compliance Teams' input regarding any questions



## What can you expect of **Bic**®

- To be a company with zero tolerance for any violations of ethical standards, corruption, favoritism and violation of international laws and standards.
- To be a company advocating a culture of honesty and trust.
- To be a company that ensures respect for any and all team members, customers, suppliers and any other stakeholders.
- To be a company that listens to everyone and protects against any form of retaliation
- To be an innovative, diverse and inclusive company
- To be a company that we all can continue to be proud of





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# Introduction

This Code of Conduct («the Code») sets out our values and the rules and behaviors to follow. Every team member must abide by and practice these behavioral standards in order to preserve and further protect our reputation.

Team members are also required to comply with the laws and regulations of the countries in which they operate, including, but not limited to, laws, regulations and standards relating to the fight against corruption, the fight against money laundering and the financing of terrorism, the protection of human rights, health and safety, the environment, the respect for data privacy and the protection of our brand.

In the event that local law provides for stricter provisions than those contained in this Code and related policies, the stricter provisions of local law shall prevail over the rules contained in this Code and other Group policies. On the contrary, where the latter are more stringent than what is provided for by local law, the rules of this Code and policies should be preferred.

## Scope

This Code applies to all team members, officers, directors of BIC S.A. and the entities and companies it owns, directly or indirectly, in France and abroad (“BIC”).

Our Code, policies and guidelines apply to everyone, regardless of their role or seniority.

Line managers and the governing body must be exemplary. If you are a line manager, you need to ensure that your team members receive the guidance, resources and training they need to understand what is expected of them. The Code

also applies to all third parties who interact with BIC.

## Consequences of non-compliance and disciplinary sanctions

All team members commit to comply with this Code. Failure to comply with this Code may engage the responsibility of the employee and/or the company. This failure can also result in losses for the business and reputational damage to BIC. Therefore, failure to comply with the Code may lead to disciplinary actions against team members, up to and including dismissal. Acts that do not comply with the Code may give rise to civil and criminal liability.

## Third party

We choose to conduct business with partners who share our values. We require all our third parties and business partners to adopt clear commitments on integrity, such as those set out in our Code.

Any party operating on BIC’s behalf must ensure that their actions comply with our Code and policies. If you are responsible for a relationship with a business partner, you must make sure that our partners comply with this Code.



**Our values in Action :**  
**Compliance With Laws**  
**and Protection of BIC's**  
**reputation *BIC*<sup>®</sup>**

# Our Commitments in the Fight Against Corruption

## What is it?

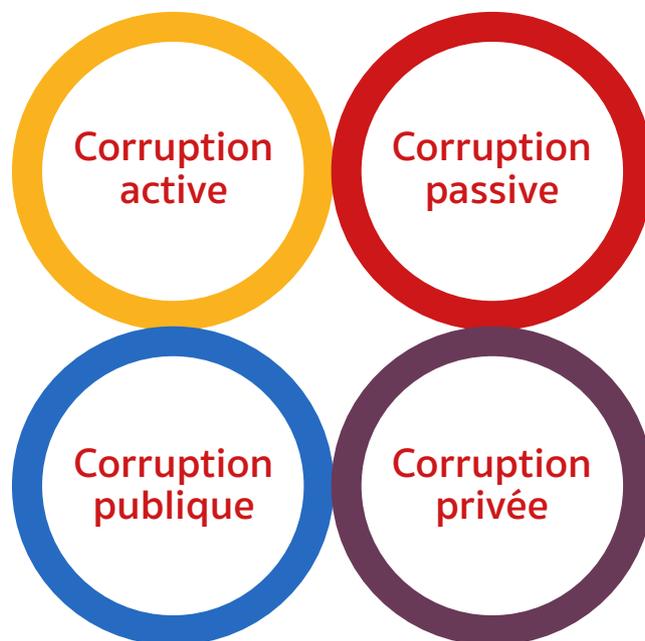
We do not tolerate any form of corruption or bribery (regardless of the amount), whether direct or indirect, passive or active, public or private, on the part of team members or our business partners, or influence peddling or facilitation payments.

Corruption is the offering, giving, accepting or receiving from a public or private person (for example, a buyer of a customer or an agent of a public authority) a gift or benefit of any kind for the purpose of, or refraining from, performing, an act falling within the scope of his duties.

An example of an act could be the award of a contract following an undue advantage or, on the contrary, the absence of competition between a supplier and other suppliers.

The nature of the undue advantage is understood very widely, it can be a material or moral advantage, of an extrapatrimonial or patrimonial nature, such as the payment of cash, gifts, the provision, free of charge, of any kind of benefit such as an apartment or a promise for future benefits. The provisions of the Sapin II Law, the Foreign Corrupt Practices Act and the UK Bribery Act, and all other local laws and international standards relating to anticorruption are directly applicable to BIC.

In the context of the application of the Sapin II Law, which applies to all the entities we own in France and abroad, as well as to all our activities around the world, we are committed to complying with the eight obligations to prevent corruption and influence peddling under Article 17 of the Sapin II Law, namely (1) an anticorruption code or policy, (2) a whistleblowing system,



(3) a corruption risk mapping, (4) third-party due diligence, (5) accounting controls, (6) anti-corruption training, (7) a disciplinary rules, and (8) internal controls related to these obligations to prevent corruption.

### How to act?

Our relationships with our team members and third parties are based on mutual trust. No form of corruption is tolerated.

Corruption is an offense. BIC and the natural persons involved in acts of corruption can be held criminally liable. It is therefore very important to understand the exact nature of the relationship you are engaging in order to protect BIC and each and every one of us.

Our anti-corruption commitments and measures are described in more detail in our Anti-Corruption Policy.

We ask you to refer to it for any additional information regarding definitions related to corruption, prohibited actions and acceptable actions, amongst others.

We ask that you always remain vigilant and use your good judgment in the conduct of your activities which must at all times be guided by this Code.

Do not hesitate to contact your line manager or a member of the Legal and/or Compliance Teams with any questions.

## Gifts and Entertainment



### What is it ?

In the course of your duties, you may be required to offer, give, accept or receive gifts or entertainment. Gifts and entertainment can take a variety of forms.

Offering, giving, accepting or receiving gifts or other benefits to private or public individuals could be perceived as an intention to influence or allow oneself to be influenced in decisionmaking.

The offer or acceptance of a gift could also bias the objectivity of the decision-maker.

Moreover, this type of behaviour could lead to situations of conflict of interest between the interest of the institution represented by the acceptor and the personal interest of the same acceptor.

### How to act?

BIC does not prohibit giving or accepting gifts or entertainment, when they are of reasonable value and are part of the usual business practice. However, in certain circumstances, a gift or entertainment could constitute an act of corruption.

You must ensure that the gift or entertainment is legitimate, reasonable and meets any limitations that may be imposed by law or by the

other party to whom the gift or entertainment is intended.

We ask you to consult the Anti-Corruption Policy and/or any other specific and applicable policies to guide you with regards to, thresholds, timing, context and frequency of gifts and entertainment, amongst others.

## Patronage, Donations and Sponsorship



### What is it ?

We must play an active and positive role in our communities in compliance with any and all legal obligations, including anti-corruption obligations. In the course of your duties, you may participate in acts of patronage, donation, sponsorship or political or any other contributions.

Offering patronage, donations, sponsorship or other benefits to private or public individuals could be seen as an intention to influence decision making.

### How to act?

You must obtain the approval of a member of the Legal and/or Compliance Teams to ensure that the transaction subject to donation or sponsorship, pursues a legitimate and reasonable objective.

In some cases, it is preferable for certain activities to be carried out specifically by BIC Corporate Foundation in order to separate our business operations from our philanthropic activities and avoid suspicion of corruption.

For more details on the Foundation, please see <https://fr.bic.com/fr/fondation-entreprise-bic>.

We ask you to consult the Anti-Corruption Policy which outlines the principles to be applied in determining potential feasibility and the rules governing patronage, donations, sponsorships or other contributions.

## Conflicts of Interest



### What is it ?

We all have a duty to act in the interest of BIC at all times.

A conflict of interest may be considered to be any situation of interference between a person's duty within BIC and their personal including financial interest, that could influence or appear to influence the independent, impartial and objective performance of such duty on behalf of BIC. A conflict of interest is likely to favor the personal interest of the person over BIC's interests.

While a conflict of interest is not, in itself, an act of corruption, it is likely to constitute the early stages of a corruption offense.

## How to act?

You must disclose a potential conflict of interest to your line manager or someone in the Legal and/or Compliance Teams.

We ask you to consult the Anti-Corruption Policy for elements relating to the framing of conflicts of interest and actions allowed or prohibited, as well as information on how and to whom to disclose such conflicts of interest.

## Lobbying



### What is it ?

BIC considers lobbying to be a lawful and positive action, making good use of its industrial expertise and knowledge of the market in its relationships with public authorities.

Representation of interests is the main or regular activity of a legal person or natural person to influence a public decision, including the content of a law or regulatory act, by communicating with public officials covered by the law.

Lobbying differs from influence peddling in the sense that the means are legitimate and strictly regulated.

### How to act?

BIC is committed to pursuing its potential lobbying responsibly and ethically and ensures compliance with the legislative and regulatory

frameworks in the exercise of its potential lobbying practices.

Any person potentially pursuing lobbying activities on BIC's behalf is expected to pursue such activities with probity and integrity and in accordance with applicable laws and regulations as well as with this Code.

As with any Group activity, the Code of Conduct and the Anti-Corruption Policy apply.

## Relationships with Third Parties



### What is it ?

BIC is in continuous contact with various third parties, such as, for example, suppliers, customers, public officials or various business partners. When we work with third parties, we must ensure that we meet our commitments and ensure these third parties meet our commitments.

We must ensure that we identify third parties and conduct third-party due diligence, both when entering into a relationship and on an ongoing basis, in order to comply with the applicable legislative and regulatory requirements in the fight against corruption, as well as reputational and social, environmental and governance responsibility.

## Public Officials and Politically Exposed Persons

A public official is a person who is a representative of the public authority, entrusted with a public service mission or holding a public elective office.

A Politically Exposed Person (PEP) is a person who poses particular risks to BIC because of the political, jurisdictional, or administrative functions he or she performs, or those performed by direct family members or persons known to be closely associated with him or her.

A due diligence is done at the beginning but also throughout the business relationship. It is important to identify any PEP to properly manage the risks of corruption. A member of the Legal and/or Compliance Teams can help you if needed.

It is not prohibited to interact with a public official or PEPs, but it is essential that the interaction be based, in particular, on this Code, the anti-corruption policy and the terms and conditions applicable to the partner and that the product or service being the subject of the transaction, where applicable, be legitimate and necessary.

## Business Partners



Business partners may be customers, suppliers or other third parties with whom we maintain or intend to maintain a business relationship.

We must only conduct business with partners

who share our values, act with integrity and respect the law.

### How to act?

You must ensure that your interactions with any third party cannot be, or be considered to be, linked with any undue advantage.

We expect our customers, suppliers and all business partners to adopt clear commitments and apply, at a minimum, the same principles in their operations as outlined in this Code.

We ask you to consult the Third Party Policy to guide your behavior with respect to third parties, to understand the proper interaction to take with public officials and BIC's expectations of our business partners.

## Contact

If you have any doubts, please contact your Legal and/or Compliance department, your line manager, your finance department or your local HR  you are not alone... we are here to help and support !

# Trade Controls, Sanctions and Embargoes



## What is it ?

Many international agreements, laws and regulations control the transfer of goods, services or information across borders.

Most countries regulate imports and exports through laws and customs procedures. Additionally, the United Nations, the United States, the European Union and several countries may impose sanctions that restrict or prohibit trade with certain other countries, entities and individuals.

## How to act?

We comply with the laws, regulations and decisions of local and international authorities to which we are subject with regard to sanctions and embargoes.

We must be vigilant in identifying any potential breach of these obligations to avoid any potential legal consequences or repercussions for our reputation.

We must also ensure that we always obtain and maintain the necessary licenses and authorizations to import and export our products and provide accurate information to customs authorities, where appropriate.

We ask you to consult the Sanctions and Embargoes Policy to guide you.





# Governance and Duty of Vigilance

# Governance



We comply with all laws and regulations that aim to combat financial crimes, including transparency of financial information, the fight against money laundering and terrorist financing, fraud and the misuse of company assets.

## Financial Information

### What is it?

The gathering, presentation and disclosure of financial information must be done in a rigorous and transparent manner.

Beyond the rules applicable to any listed company, BIC owes its business partners, investors, shareholders, stakeholders and the community to provide a true and global vision of its financial health.

### How to act?

You must ensure that the collection, analysis and documentation of this information is done in a correct and rigorous manner, and that any transaction is properly recorded.

## Anti-Money Laundering and Combatting the Financing of Terrorism

### What is it?

Money laundering is the act of facilitating, by any means, the false justification of the origin of the goods or income of the perpetrator of a crime or offense which has provided the perpetrator with a direct or indirect profit. BIC is committed to complying with anti-money laundering laws and regulations in order to prevent any act in this regard.

## How to act?

We must remain vigilant to potentially suspicious transactions and illegal activities to protect BIC and ensure that the company is not used for the purpose of money laundering.

Each BIC business unit must follow procedures to determine the identity and legitimate operations of its customers and must maintain procedures to prevent the acceptance of suspicious payments.

We must only do business with third parties with whom we have carried out adequate due diligence and performed controls to know them and their activities.

## Fraud, Misuse of Company Assets

### What is it ?

Fraud is the act, either by the false representation of a name or quality, or by the abuse of a true quality, or by the use of fraudulent acts, of deceiving a natural or legal person and of convincing them as such, to their detriment or to the detriment of a third party, to remit funds, securities or any property, to provide a service or to grant an act of operating obligation or discharge.

The misuse of company assets is the use, in bad faith, of company's assets by any employee, who know that such use is contrary to the company's interest, for personal purposes or to benefit another legal or natural person in which they may have a direct or indirect interest.

Any type of fraud or misuse of company assets or financial offense is prohibited by BIC's values as well as applicable laws.

## How to act?

BIC's property and resources are to be used in a reasonable, lawful and appropriate manner.

Using, taking, selling, lending, borrowing or giving any away without authorization is punishable by law. You must act in BIC's interests at all times, including when spending BIC's money or making financial commitments on behalf of BIC.

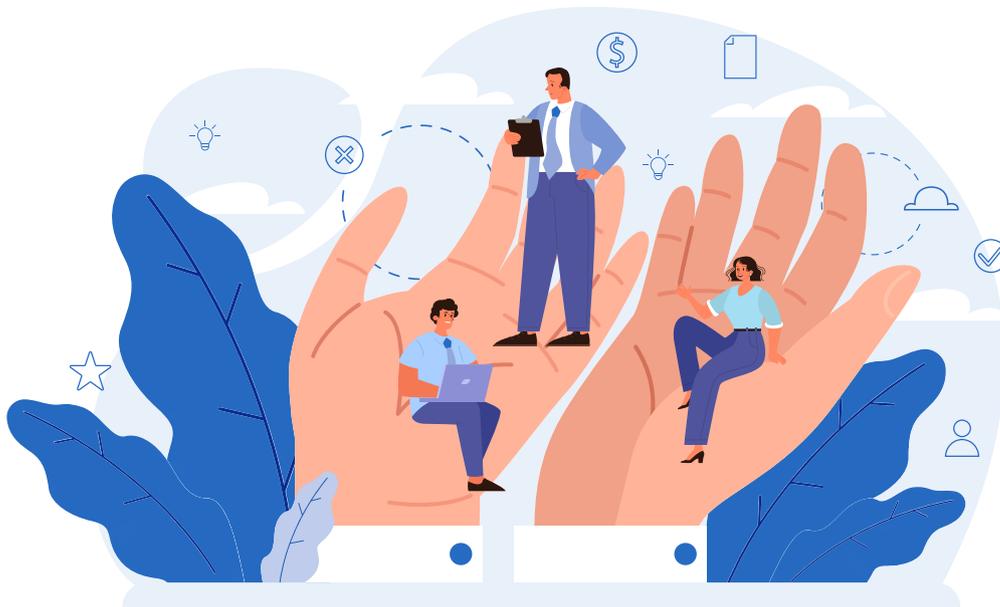
Your expense reports must only include expenses incurred in the course of the exercise of your function and comply with the policy applicable to each of these expenses (meals, hotels, transportation, etc.). Each expense must be accompanied by a corresponding receipt or invoice.

You are required to behave in an exemplary and transparent manner and you must immediately communicate with the Finance, Legal and/or Compliance Teams when you suspect potential fraud or misuse of company assets or any other financial offense.

## Contact

If you have any doubts, please contact your Legal and/or Compliance department, your line manager, your finance department or your local HR  you are not alone... we are here to help and support !

# Our Commitments Related to Environmental, Social and Governance (ESG)



The Duty of Vigilance Act, to which BIC is subject, aims to ensure measures to prevent violations of human rights, health and safety and the environment.

This law provides in particular for the establishment of a vigilance plan and prevention measures including risk mapping, third-party evaluation, an internal whistleblowing system and monitoring system.

Vigilance must focus on the activities of the company but also on the subsidiaries it controls as well as on the subcontractors or suppliers with whom an established business relationship is maintained.

## Human Rights

The Universal Declaration of Human Rights is a protective framework for human rights.

### What is it?

#### Human Rights, Diversity and Inclusion

Our values dictate strict respect for human rights standards in everything we do. We do not tolerate discrimination or harassment for any reason.

#### Discrimination and Harassment

We do not discriminate or tolerate harassment based on grounds such as age, race, religion, color, ethnicity, national origin, disability, sexual orientation, gender, gender

identity, gender expression or marital status, and any other characteristic for which legal protection is afforded by local law.

Harassment includes any verbal, psychological or physical conduct designed to threaten, intimidate or coerce, or verbal conduct that, in the team member's opinion, impairs his or her ability to perform his or her job.

This applies to all aspects of the performance of your duties. The motives or targets of harassment may, but do not necessarily fall, within protected categories.

This Code, as well as the law, prohibits sexual harassment in any form. Sexual harassment is defined as unwelcome sexual advances as well as any other verbal or physical conduct of a sexual nature that can create an intimidating, hostile or offensive working environment. Harassment is determined by the victim and not the aggressor.

### **How to act?**

We all must help create an environment in which team members, business partners and members of our communities feel valued, respected and free to unlock their full potential to succeed.

We value cultural and individual diversity as essential elements of our team culture. We ensure fair treatment, equality of opportunity and fairness in access to resources for our team members. We treat everyone with dignity and respect.

You are required to behave in a manner that complies with BIC's commitments to respect human rights, diversity, inclusion and the prohibition of discrimination or harassment at all times and we expect the same from third parties we interact with.

## **Health and Safety**

### **What is it ?**

We are committed and responsible for maintaining safe and inclusive working conditions for all our team members and third parties.

A safe working environment is based on effective compliance with applicable laws, standards and best practices in workplace health, safety and environment.

Our strict commitments and specific health and safety standards apply to everyone and are intended to help ensure safety for everyone, wherever, every day.

### **How to act?**

It is up to all of us to ensure a safe and healthy work environment.

One of the key ways in which we show that we value each other is to alert and report to your management any risk that may affect health and/or safety in the performance of your duties.

## **Environment**

### **What is it ?**

Managing the environmental impact of our operations, our business partners, our supply chain and our products and services is important to us and our stakeholders and is key to BIC's long-term success.

We are committed to making our brands and business more sustainable by significantly reducing our environmental impact along our entire supply chain.

We consider the environmental consequences of each of our business decisions.

### How to act?

We are all committed to reducing our environmental footprint. We are constantly working with our business partners to reduce environmental impacts along the whole supply chain and in all our activities.

### Contact

If you have any doubts, please contact your Legal and/or Compliance department, your line manager, your finance department or your local HR → you are not alone... we are here to help and support !





# **Protection** of Confidential Assets and Information

# Trademark Protection



## Trademark Protection

Quality, Intellectual Property and the Fight against Counterfeit

### What is it ?

#### Quality

BIC's values are based on everyone's accessibility to quality products.

BIC is very proud of the quality of what it creates and its products. Consumers must be able to trust the quality of our products at all times.

BIC's reputation is based on the responsible application of the highest quality standards in all parts of our business, throughout our supply chain, from product design to customer service.

#### Intellectual Property

Our brands and technical innovations are protected by trademarks and/or patents.

These cover our inventions, such as unique technologies and production methods, copyrights and designs which protect our communications, advertising marketing materials and our distinctive designs as well as our trade secrets and domain names, such as formulas, designs, models or devices.

#### Undertakings against Counterfeit

We act responsibly to protect our brands and products from counterfeit so that our consumers can continue to trust the quality of our products.

Counterfeit products can lead consumers to confuse them with, or falsely link them to, genuine BIC products eroding this trust.

We have a duty to stop any form of counterfeiting that can lead to negative impacts on BIC and/or be dangerous for our consumers.

## How to act?

### Quality

You must ensure that our products comply with all applicable regulations and that all packaging designs and other product changes comply with our product safety process.

Throughout the supply chain, we must ensure that all our business partners work in line with our safety rules and quality standards. It is important to follow the BIC Group Product Safety Guidelines.

### Intellectual Property and Counterfeiting

If you see a product you suspect may be counterfeit, you should report it immediately to your counterfeit manager, so BIC can take action.

You must never download, copy, distribute, post on a website or use any materials covered by another person's or organization's copyright without obtaining their permission.

## Fair Competition

### What is it ?

We must adhere to all laws intended to protect and promote free and fair competition around the world.

Antitrust or competition laws regulate dealings with competitors, customers, distributors and other third parties.

### How to act?

Each employee must ensure, in all commercial transactions or calls for tenders, not to distort the free play of competition. Applicable laws and regulations are often complex and vary from country to country in scope.

All employees must ensure that their behavior does not constitute a restrictive practice of competition consisting, in particular, in obtaining unjustified or disproportionate benefits, creating a significant imbalance between the parties to the contract or abruptly breaking an established business relationship.

Each of our products must be delivered at its fair value and no action contrary to competition law must be taken. All employees must refrain from participating in an unlawful agreement or abuse the position of strength in which BIC may find itself. You must not agree or even discuss with competitors to fix prices or other specific business terms, limit production, allocate territories, products or customers, or refuse to deal with any customer or supplier.

You should not discuss commercially sensitive information with competitors, for example, pricing, costs, margins, terms, marketing plans or new product launches.

It is important to stay up to date on industry news. However, be careful not to use a trade association as a forum to agree on a common approach to a client or to deal with a commercial issue between competitors that may violate the law.

# Information Technology Security, Confidentiality, Data Privacy and Personal Information



## Information Technology Security and Confidentiality

### What is it?

BIC's confidential information is a valuable asset, and we all need to help to protect and manage it effectively. If any confidential information is shared outside of BIC, it may not only pose a legal risk, but may also affect our profitability and damage our reputation.

Confidential information may be trade secrets, non-public financial information, business plans or strategies, marketing, innovation and promotional activity plans, price lists and customer lists, personal information about our team members, or business partners,

salary data or personal login credentials and passwords.

### How to act?

In order to protect the security of our information, you must, among other things, use strong passwords and keep these and your user identifications secure and private.

It is important to classify all BIC information not in the public domain in accordance with the policies established by the group. All BIC's internal documents are deemed confidential unless the Legal and/or Compliance Teams classify them in a different manner.

When making external communications, make sure that you only send necessary, public and non-confidential information.

You can protect the confidentiality of our information by acting prudently, such as, for example, not talking about confidential things in public, in an elevator, train or plane, not leaving documents in garbage bins in hotels or public places, putting protective screens on computers or laptops, and shredding any confidential documents.

You are required not to discuss, retain, process or give access to confidential information to persons other than those entitled to it for the purposes of carrying out their functions.

You should remain vigilant and not respond to unexpected and suspicious emails, and do not open links contained in these emails as they could contain inappropriate links. When you receive an email outside of BIC, be even more vigilant.

## Data Privacy and Personal Information



### What is it?

In the course of our business, some of us will hold or have access to personal information about team members, customers, suppliers, consumers and other individuals.

We respect personal data and personal information and handle it responsibly in accordance with, inter alia, the General Data Protection Regulation (GDPR), as well as local requirements in all countries in which we operate.

Sensitive personal information about a person's health, race, ethnic origin, political opinions, moral and religious beliefs, sexual life or criminal activities needs to be handled with particular care and in accordance with local requirements.

### How to act?

You must ensure that individuals who provide personal data and information are made appropriately aware of their rights, of who will have access to their data, for what purpose, as well as the fact that only pertinent data is requested and stored specifically for the purposes for which it was collected.

For more information on the specificity of the collection and management of personal data and information, please consult the Global Privacy Policy, contact the Data Privacy Officer or a member of BIC's Legal and/or Compliance Teams. If you encounter any breach(es), please promptly report them to the following address: [privacy@bicworld.com](mailto:privacy@bicworld.com)

Personal information must be:

- Fairly and lawfully obtained, and managed according to appropriate processes.
- Processed only for limited or stated purposes and minimized to what is necessary for that purpose.
- Shared with third parties only with appropriate safeguards in place.
- Accurate, relevant, not excessive and not held for longer than is necessary or relevant to the purpose for which they were collected. Its retention period must be correlated with that purpose
- Handled with respect for an individual's legal rights
- Securely and appropriately handled and stored

- Transferred to other countries only in accordance with BIC Group's Personal Data Protection Policy and any applicable regulations regarding the transfer and protection of personal data.

Team members may not record conversations, phone calls, video calls, images or company meetings with any recording device without prior permission to record from team members, business partners and third parties of any recordings.

Never share BIC confidential information with any third party application or technology service including generative artificial intelligence tools (Gen-AI) without a contractual agreement in place, approved by BIC Legal and a review by BIC IT.

If you witness or are the victim of a breach of our Code of Conduct, values and the integrity of our work environment, do not be tempted to record the event but rather have the reflex to share this with your supervisor or the Legal and/or Compliance Teams or on the SpeakUp platform or by e-mail [speakup@bicworld.com](mailto:speakup@bicworld.com).



## External Communication and Social Media

### What is it ?

It is crucial that we carefully manage communications with our external stakeholders, including investors, the media, community or government representatives, commercial partners, customers and consumers.

BIC's day-to-day contact with the media and communities is managed by the global and local market Communications teams, who must also approve any speaking engagement on behalf of the company. Communication with investors is managed by the Investor Relations team.

### How to act?

It is imperative not to engage with the media on BIC's behalf. Only the Communications team can respond to a journalist on BIC's behalf.

You are required to report and refer to the communication team any approach by a journalist, investor or financial analyst to Corporate Stakeholder Engagement.

You must also seek approval from the Communications team before accepting an invitation to speak at or take part in an event on behalf of BIC.

Any misleading, malicious, offensive, inappropriate, discriminatory, intimidating, negative, culturally insensitive or unfair statements online or in any media about BIC, your team members, our competitors, or our external stakeholders, commercial partners, customers or consumers are in no way tolerated.



# **We are Listening :** Reporting and Alert System

# Reporting



We all need guidance in some situations.

Every situation is different and no code, policy or standard can cover everything. If you have any doubt about how to do the right thing, do not hesitate to seek help or advice.

## What is it?

If you believe that something is happening that is not in line with this Code of Conduct and our values we advocate, report it!

You have the opportunity to promptly report any potential or actual breaches of our Code, policies or guidelines or any suspected violations or violations of the law.

## How to act?

Whether seeking advice or speaking out, you can always speak to your line manager, a human resources manager, a member of the Legal and/or Compliance Teams or use the BICSpeakUp.

Contact the website anonymously or leave your contact information. BICSpeakUp.com is managed by a third-party support service provider, independent of BIC, and its staff speaks multiple languages.

An e-mail address is also available at [SpeakUp@bicworld.com](mailto:SpeakUp@bicworld.com). This email address is only intended for the Legal and Compliance Teams, which are committed to protecting your anonymity if you so desire.

# Protection against Retaliation



Raising a concern can take courage, and sometimes what holds us back is fear of the reaction of our colleagues and managers.

Be assured that the law requires BIC to ensure confidentiality regarding your identity, the facts, the person concerned, and any third party mentioned in the alert. A whistleblower can also ask to remain anonymous. Any access to alert information shall be limited to persons designated to handle the alert.

BIC does not tolerate any act of retaliation against a whistleblower. The law protects the whistleblower, his facilitators, his entourage and the companies controlled by the whistleblower against all retaliation.

Any person who obstructs, in any way, the transmission and processing of a report is liable to criminal penalties including imprisonment.

## Contact

If you have any doubts, please contact your Legal and/or Compliance department, your line manager, your finance department or your local HR  you are not alone... we are here to help and support !



Photo : Didier Delmas



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