

GROUP SPEAK UP POLICY

OCTOBER 2024

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INTRODUCTION

At the L'OCCITANE Group, our Shared Values and [Code of Business Conduct](#) guide our everyday conduct in the way we do business. They promote a culture of transparency, accountability and integrity.

Speaking up essentially means raising your concern so that it can be addressed. If you hear or see behaviour that possibly violates our Code of Business Conduct and/or a law/regulation, you are encouraged to speak up. The Group **entrepreneurial** spirit fosters direct communication, and **feedback** should remain the natural way to speak up. We also know this is not always possible or realistic, so we offer various other ways to speak up.

Speaking up is essential to protecting people and nature. It is also key to sustaining our reputation, success and ability to operate – both now and in the future. By speaking up, you give the Group and its value chain the opportunity to deal with the situation proactively.

WHY HAVE A SPEAK UP POLICY?

The purpose of this Speak Up Policy is to explain when, where and how you can raise a concern about suspected misconduct without fear of retaliation. It also describes what you may expect from the Group when you do speak up and what possible steps will be taken after you raise a concern.

This policy is aimed at providing a global framework within the L'OCCITANE Group and its brands. We are a multinational, multi-brand and multicultural company that observes all laws in the countries in which it operates. If there are any discrepancies or different standards of protection between the applicable laws and the requirements set out in this policy, the principles that provide the highest protection to individuals prevail.

WHO CAN SPEAK UP?

As everyone has responsibility for ethics, this policy applies to all our employees and external stakeholders worldwide, including:

- employees, interns and contractors;
- suppliers in the value chain and their employees;
- customers and prospects;
- community members.

Users of the Speak Up channel must act in good faith and not make deliberately false allegations. That means that the intention behind the report must be to bring a potential issue to light, not to be malicious or hurtful.

WHAT ARE THE PRINCIPLES?

As trust is a prerequisite for effectiveness and adoption by users, the Speak Up channel relies on four pillars:

- Protecting the person who raised the alert
- Considering the good faith of the alert and presumption of innocence of anyone targeted by an alert
- Good conduct of the parties involved in the reception and processing of the alert
- Ensuring confidentiality of facts and people's identities

L'OCCITANE Group will not tolerate any form of retaliation against the reporter or any employee who has assisted in the investigation or remediation of a Speak Up report. Retaliation is any action that causes financial, professional or emotional harm to a reporting party as punishment for submitting a report.

WHAT SHOULD BE REPORTED?

You do not need to be certain a violation of policy or breach of legislation has occurred before making a report, and you should not try to gather evidence yourself before making a disclosure.

However, you should make sure that your concern is covered by the Group Speak Up Policy and must act in good faith. Overall, it should be used to raise concerns about a suspected violation of a law, regulation and/or our [Code of Business Conduct](#).

Examples of concerns that can be raised using Speak Up channels:

- Human rights violations
- Moral or physical harassment
- Discrimination
- Environmental, health and safety issues
- Bribery and corruption
- Fraud and theft
- Conflicts of interest
- Retaliation against anyone for speaking up in good faith

When Speak Up channels should NOT be used:

- Grievances you may have in relation to your terms of employment or HR matters
- Personal or legal disputes
- Events presenting an immediate threat to life or property (*emergency services must be contacted in such situations*)
- Complaint about your orders or experience with the L'OCCITANE Group brands (*for such cases, please contact the Customer Care of your country*)
- Accusations which you know to be false

HOW TO SPEAK UP?

There are multiple ways and channels to speak up. It does not matter which one you choose, so you can **speak up in whichever way you feel most comfortable**.

It also depends on several factors, including the context of the situation, the nature of the issue, the potential impact and the relationships between the parties. As part of our feedback culture, the L'OCCITANE Group strongly encourages you to raise concerns through one of the direct channels:

- Directly to the person(s) involved

Leading by example is indeed one of our core values, and feedback is at the heart of how we work. If the issue is straightforward and can be resolved quickly through direct communication, it is often best to address it immediately. If that is not possible or you do not feel comfortable doing so, please raise questions and concerns through one of the other channels.

- A trusted colleague (your Manager, HR or Internal Audit team)

A natural person for employees to approach when raising a concern is their direct Manager. Alternatively, there are multiple people outside your department who you can speak to, such as your local HR team or the Group Internal Audit team. You can seek advice from them informally about what to do, but they can also support you in filing a Speak Up report.

If you do not feel comfortable discussing this with someone directly, you may report it confidentially through the following channels:

- Your local Speak Up channel (*Exclusively for L'OCCITANE Group employees and subject to local availability*)

Affiliates may establish a channel at the local level. Employees refer to their local HR or legal department, which operates under the oversight of the respective affiliate.

- The Group Speak Up channel

You can use the [L'OCCITANE Group Speak Up channel](#) that enables any person to report possible violations. It is provided by an independent third party who guarantees anonymous reporting and can be accessed 24 hours a day, 7 days a week, and is available in more than 70 global languages. It can be accessed via the Group's corporate website, by phone or through a mobile app.

HOW TO USE THE GROUP SPEAK UP CHANNEL?

- By using the [online platform](#): You will need to create a password and will receive a case number which enables you to follow up on your alert and communicate (even if you choose to remain anonymous) with the investigation team. To follow the updates on your report, you can either leave your email (kept confidential by the solution provider and not disclosed to L'OCCITANE Group) and receive notifications or reconnect to the platform by entering your password and case number.
- By using the **mobile app version** of the solution provider ([Android](#) or [iPhone](#)): You can access the Group Speak Up channel with the code 116979 or with a QR code. You will create a password and be provided with a case number to access your report account. Via this account, you will get notifications on your phone, updates on the case and be able to communicate with the investigation team (even if you choose to remain anonymous).
- By leaving a **phone message** (numbers available in the annex): You can access the Group Speak Up channel with the code 116979, create a PIN password and leave an audio message detailing your concern in your local language. At the start of the call, you will be provided with a case number to check report progress by calling the number again.

What kind of information do you need to provide?

When you communicate an alert, please provide as much detailed information as you can to enable the Group to assess and investigate your concern. Such details may include:

- the background, history and reason for the concern;
- the identity and positions of the people involved, dates, places and other relevant information;
- all documents that may substantiate your report.

Keep in mind that the information provided must be factual and directly related to the subject of the alert.

Is the reporting process done anonymously?

Reports are made anonymously through the Group Speak Up channel via an external solution hosted outside the Group. This allows completely anonymous interactions with the team receiving and reviewing the report. If you wish to identify yourself, the Group will take all appropriate steps to keep your identity a secret. Such information will only be disclosed on a need-to-know basis when it is necessary for an investigation or as required by the applicable law.

Who deals with the alerts?

All alerts received by the L'OCCITANE Group Speak Up channel are logged in our provider's case management system, which is accessible only by the Group Internal Audit team.

If needed for the investigations, other internal and/or external stakeholders may be involved (e.g. HR, Legal or Responsible procurement), depending on their nature and the expertise required. Information is shared with them on a need-to-know basis. They will be bound by a specific non-disclosure agreement and work under strict confidentiality. Anyone involved in such investigations must be free from actual or perceived bias and conflicts of interest.

How are investigations managed?

After submitting a report, you will receive a confirmation of receipt within seven working days. Upon receiving the alert, the Group Internal Audit team will:

- assess the concern to make sure that it falls within the scope of this policy;
- identify whether the report includes minimum actionable information and evidence for investigations;
- proceed to a triage process depending on the nature of the case and the expertise required.

Each report will be investigated with the appropriate level of time, attention and resources required for the responsible handling of the matter. Reviews and investigations are conducted in an independent, fair and unbiased manner with respect to all the parties involved and in accordance with relevant laws, policies and principles.

What will be the outcome?

The L'OCCITANE Group aims to conclude investigations within a reasonable period, but some cases may require an extended timeline. If your concern is well-founded, appropriate steps will be taken, when necessary, in accordance with the law and our policies.

All investigation reports and accompanying evidence are stored securely within the Group Speak Up platform. Investigation reports are confidential. The reporter will be informed of the investigation proceedings and the overall findings when it is appropriate and possible.

HOW PERSONAL DATA IS MANAGED?

The Group will collect and process your personal data as part of the Speak Up channel to process the report you make. More details about the processing of your personal data, your rights and how to contact us are available in our [Speak Up Privacy Policy](#).

Reinold Geiger
Chairman
L'OCCITANE Group

REVISION HISTORY

Date	Release	Author	Tracking notes
December 2021	1.0	Group Internal Audit department	Initial release (only internal)
October 2024	2.0	Group Internal Audit department	Update with new solution provider (for both internal and external)

ANNEX

Region	Phone instructions	Region	Phone instructions
Albania	+355 4 530 1801	Jordan	80 023 801
Algeria	+213 983 29 93 38	Kazakhstan	(+7) 877 2735 74582
Angola	244 226 425 610	Kenya	+254 20 765 0957
Anguilla	18 334 222 005	Korea, the Republic of	+82 2 3700 5146
Antigua and Barbuda	18334222006	Kuwait	96 522 055 730
Argentina	+54 11 2039 7280	Latvia	80 005 929
Australia	+61 2 8284 6262	Lebanon	8 338 160 193
Austria	800 909 683	Lithuania	880 030 366
Bahamas	18 334 222 007	Luxembourg	3 523 420 808 982
Bahrain	97 316 501 936	Malaysia	+60 3 7724 3136
Bangladesh	+880 (0) 9610 998462	Malta	80 065 144
Barbados	+1 (246) 623 9631	Martinique	0800 90 1651
Belarus	882 004 910 089	Mauritius	+230 5 297 0999
Belgium	0800 89 326	Mexico	+52 55 4780 6198
Belize	18 000 130 076	Moldova	80 060 016
Benin	+229 20 90 0380	Morocco	+212 5 30 14 41 08
Bermuda	18 334 222 008	Myanmar	8 008 008 062
Bhutan	+975 2 379 003	Namibia	+264 83 380 0103
Bolivia	800 105 122	Nepal	18 000 010 186
Bosnia and Herzegovina	+387 70 330 093	Netherlands	+31 10 700 75 03
Botswana	8 007 861 103	New Zealand	+64 9 913 5892
Brazil	+55 (11) 4700 8838	Nicaragua	50 575 137 610
Brunei Darussalam	8 014 657	Nigeria	7 080 601 221
Bulgaria	8 002 100 645	North Macedonia	38 925 513 216
Burkina Faso	+226 25 30 09 82	Norway	+47 24 14 06 01
Cambodia	1 800 209 867	Oman	80 074 161
Cameroon	+237 6 57 10 31 12	Pakistan	80 090 044 437
Canada	+1 (514) 395 0496	Panama	5 073 084 480
Cayman Islands	+1 (345) 769 5580	Papua New Guinea	861 322
Chile	+56 22 483 5917	Paraguay	98 004 410 266
China	1080 0152 3042 (Freephone via China Telecom)	Peru	80 074 535
China	1080 0852 2221 (Freephone via China United Network)	Philippines	180 083 948 474
China	400 120 1842 (Country wide number, charged at local rate)	Poland	800012953
Colombia	576 012 421 247	Portugal	800 831 302
Costa Rica	50 640 360 350	Puerto Rico	+1 (787) 200 7305
Côte d'Ivoire	+225 05 66 77 0918	Qatar	800 101 094
Croatia	8 007 745	Réunion	1 800 916 980
Cyprus	80 091 142	Romania	800 400 653
Czechia	800 050 833	Russian Federation	8 (800) 100 69 94
Denmark	+45 43 31 09 61	Saudi Arabia	8 008 501 433
Dominica	18 334 221 998	Serbia	+381 10 520 043
Dominican Republic	+1 (829) 947 1996	Seychelles	800 131
Ecuador	1 800 001 432	Singapore	6 564 037 051
Egypt	8 000 000 083	Slovakia	800 113 418
El Salvador	50 322 304 752	Slovenia	80 083 115
Estonia	3 726 093 008	South Africa	+27 (21) 427 7937
Ethiopia	800 86 1919	Spain	34 900 031 156
Fiji	8 002 650	Sri Lanka	+94 (72) 091 0370
Finland	800 392 912	Sudan	+249 15 655 9883
France	805 543 753	Suriname	8 338 160 919
French Guiana	0800 99 1448	Sweden	201 604 703
French Polynesia	0800 91 4886	Switzerland	800 005 691
Georgia	1 800 008 013	Taiwan	+886 2 7743 8912
Germany	8 001 818 952	Tanzania	0800 11 1020
Ghana	+233 59 699 3553	Thailand	+66 2 844 9693
Greece	80 044 145 924	Trinidad and Tobago	+1 (868) 224 1869
Grenada	+1 (473) 230 0333	Tunisia	+216 31 300 338
Guam	18 338 096 777	Turkey	800 448 828 602
Guatemala	50 223 028 459	Turks and Caicos Islands	18 334 621 355
Honduras	80 027 916 139	Uganda	+256 41 423 8162
Hong Kong	85 230 194 193	Ukraine	800 801 205
Hungary	06 809 845 89	United Arab Emirates	80 004 440 408
Iceland	3 544 150 349	United Kingdom	8 000 224 118
India	8 000 503 159	United States of America	+1 (669) 288 7154
Indonesia	+62 21 8063 0074	Uruguay	415 985 762
Ireland	1 800 800 636	Venezuela	582 123 357 722
Israel	97 233 741 225	Viet Nam	8 419 003 271
Italy	800 147 694	Virgin Islands (British)	18 334 621 356
Jamaica	+1 (876) 677 9125	Virgin Islands (US)	18 337 246 398
Japan	+81 3 6627 0734	Zimbabwe	2 638 677 422 010