Doing Business the Ontex Way

Caring for People

Integrity in the Market Place

Respecting Company Information

Ethics in our Business Activities

Our Code of Ethics
A message from Charles Bouaziz, CEO

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Integrity is the quality of being honest and having strong moral principles. It is also the state of being whole and undivided. That is why integrity forms the basis for our Code of Ethics.

Ontex is dedicated to running its business in accordance with the highest standards of integrity and ethical practice in all areas. Our corporate values—passion, reliability, integrity, drive and everyone—represent our core strengths that guide us towards the realization of our strategy and vision.

I am proud to be part of a community that has such strong values—values that I recognize in myself and strive to live each day. Our Code of Ethics has been developed to help us protect that community and prevent us from damaging our reputation and our business. It is not intended to make your life more difficult. It provides simple guidance that will help you to act with honesty and integrity in everything you do.

Our Code of Ethics sets the framework within which you have the freedom to act and operate in your daily work and, by doing so, contribute to the Ontex success story. Our commitment to doing the right thing, which means complying with both the spirit and the letter of the laws that govern our industry, gives us a competitive advantage.

This Code of Ethics and the Ontex values reflect the basic standards we believe in and according to which we expect you to run our business. They provide a strong foundation to build the trust that is crucial to ensure our continued success.
Our Values

PASSION
We care: we champion Ontex in everything we do.

RELIABILITY
We deliver on expectations.

INTEGRITY
We each take responsibility for doing the right thing.

DRIVE
Only our best is good enough.

EVERYONE
We work together to achieve our shared goals.
How to use our Code of Ethics?

At Ontex we are committed to demonstrating integrity and honesty, and behaving ethically towards our employees and in all of our business practices. We expect our employees and all people acting on our behalf to conduct our business according to the highest business standards.

Who does our Code of Ethics apply to?

Our Code of Ethics applies to **all Ontex employees** wherever located, all being individuals working at all levels and grades within Ontex including senior managers, officers, directors, permanent, fixed-term or temporary employees, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers or interns.

It also applies to those **doing business on behalf of Ontex** such as agents, distributors, joint venture partners, consultants and other third party intermediaries.

Our **suppliers** are expected to fully respect the principles of our **Supplier Code of Conduct**.

Who can you go to if you have a question about our Code of Ethics?

In addition to your **Line Manager**, you can ask people in the specific department within Ontex that has particular expertise in that subject. They are noted in each chapter. You can find all relevant contact details at the end of our Code of Ethics in the section ‘**Contact Information**’.
Where can you find **additional policies and guidelines**?

Additional policies and guidelines which provide further guidance on matters covered by our Code of Ethics are available on the **Ontex intranet site**.

Our Code of Ethics and the additional policies and guidelines are **living instruments** and will be reviewed periodically to reflect the evolution of the world and the markets in which we operate. We will make sure that you have access to and understand any changes to our Code of Ethics, policies and guidelines.

Our Code of Ethics cannot cover every eventuality or local particularity. If a specific situation arises which is not covered by our Code of Ethics, by other internal policies or guidelines or by your (employment or other) agreement with Ontex, the situation will be examined **in the light and the spirit of our Code of Ethics and in accordance with applicable laws**.

Whenever you are requested to inform or notify another employee, seek approval or give your approval, make sure to do so in writing and to keep records for audit or monitoring purposes.
What are your personal responsibilities?

EVERYONE shall follow the letter and spirit of our Code of Ethics

You shall:
• Be familiar with our Code of Ethics and know how to access it
• Read and understand our Code of Ethics
• Know and apply the principles and rules of our Code of Ethics in the work you do and the decisions you make
• Attend any training relating to matters covered by our Code of Ethics
• Ask questions whenever you are unsure
• Speak up if you think our Code of Ethics has been breached in any way. Consult the ‘Speak-up’ section at the end of our Code of Ethics.

LINE MANAGERS shall lead by example

You as a Line Manager have the responsibility of leading by example. It is important that you serve as a positive role model and inspire others to embrace our Code of Ethics by:
• Encouraging ethical behavior and decision-making
• Ensuring new starters understand our Code of Ethics
• Creating an open work environment where employees feel comfortable raising concerns
• Preventing retaliation against those who speak up
• Seeking help in resolving and escalating issues when they arise.
What are the sanctions in case of breach?

All reports of suspected violations of our Code of Ethics will be taken seriously and investigated. Not complying with our Code of Ethics, policies or procedures and/or applicable laws and regulations may result in disciplinary actions.

In case of violation of the law, civil and/or criminal penalties may be imposed by a governmental agency or a court.
At Ontex, people are at the heart of everything we do.

We take care of our employees and those we are in contact with in our daily business as we believe this is how we will achieve our goals.

We respect our employees and all people acting on our behalf and strive to make our offices and factories a great place to work where everyone can grow in trust and wellbeing and rely on each other.

We promote individual excellence and collaborative teamwork. We treat our customers, suppliers and other business partners with consideration and dignity.

• Working Conditions
• Health and Safety
• Human Rights

Our culture of honesty and trust helps orient new employees to understand that operating with integrity is simply the way things are done at Ontex.

Astrid De Lathauwer
Group HR Director
Working Conditions

At Ontex we are committed to maintaining an inclusive working environment, with working conditions that promote diversity, equal opportunities and fair employment practices for everyone. Behaving ethically means not engaging in any discriminatory practices.

This means that you are expected not to engage in any direct or indirect discrimination based on age, gender, nationality, race, color, ethnic origin, sexual orientation, marital or civil partnership status, religion, political opinion, language, disability or any other status protected by laws or regulations in the locations you operate.

Moreover, you should not tolerate degrading treatments such as sexual or mental harassment, disrespectful language, discriminatory gestures or any form of physical violence.

We do not use child labor and do not tolerate the use of child labor by our customers, suppliers and other business partners.

Health and Safety

At Ontex we are committed to protecting the health and safety of our employees, visitors and contractors. We promote a safe work environment and aim for zero occupational accidents and illnesses.

This means that you are expected to comply with the prescribed safety rules and instructions relevant to your work, to set the example for those you work with and to raise any concerns about potential health and safety risks.

Please contact Health & Safety or your local contact person for operational health and safety for questions and guidance relating to Health and Safety within Ontex.
Human Rights

As Ontex is an international company, we interact every day with a variety of people around the world.

At Ontex we are committed to respecting the human rights of our employees and the people acting on our behalf, as well as those of our customers, suppliers and other business partners, in line with the United Nations Guiding Principles on Business and Human Rights.

We condemn and dissociate ourselves from all forms of slavery, torture, degrading treatment or inappropriate working conditions.

This means that you are expected to:
• Help make Ontex a great place to work where everyone is welcome and human rights are respected
• Be a good neighbor wherever we operate
• Build strong partnerships with trusted suppliers and ensure that human rights and labor standards are respected throughout the supply chain.

Please contact Sustainability for questions and guidance relating to Human Rights within Ontex.
At Ontex we are proud to offer our customers and consumers hygienic solutions of outstanding value.

We act at all times with integrity, fairness and legality in the markets in which we operate, emphasizing the quality of our products, both private label and branded.

We are a socially responsible and a preferred company to our consumers, investors, employees, customers and other business partners. We understand and respect their needs and continuously fulfil the commitments we make.

We compete vigorously but fairly, creating sustainable and profitable growth.

• Quality of our Products
• Responsible Marketing and Advertising
• Fair Competition
• Sustainability

Being trusted as a person of integrity is the most valuable quality anyone can have in their life.

Annick De Poorter, Group R&D, Quality & Sustainability Director
Quality of our Products

At Ontex we are committed to supplying high quality hygienic solutions that meet the needs and expectations of our consumers and customers.

To ensure the best quality in our processes and products we work in a result oriented way for continuous and measurable improvements. It is one of our key priorities to produce products of consistently great quality and to provide business excellence in services.

This means that you are expected to:

• Take ownership for and work according to all relevant policies, procedures and instructions to ensure the quality and safety of our products and services
• Report and deal appropriately with the occurrence of any non-conformity
• Support us in driving continuous improvement through all processes and instructions
• Actively contribute to achieving the established quality goals and objectives, ethically.

Responsible Marketing and Advertising

Our products touch millions of people every day. All communications relating to our products must be legal, decent, honest and truthful.

This means that when communicating about our products, you are expected to:

• Represent the qualities of our products in an honest way
• Make statements that are substantiated by transparent and reliable testing or proof
• Use truthful statements in our advertising or on our packaging
• Seek the necessary legal guidance when in doubt about the truthfulness and legality of a claim.

Please contact Quality for questions and guidance relating to Quality of our Products within Ontex.

Please contact Marketing for questions and guidance relating to Responsible Marketing and Advertising within Ontex.
Integrity
in the Market Place

Fair Competition

At Ontex we conduct our business in line with the principle of fair competition and we comply with all antitrust and competition laws applicable to our business. We believe that competing fairly is key and contributes to profitable and sustainable growth.

Moreover, investigations by competition authorities may result in significant fines and costs and damage our reputation.

This means that in your contacts with competitors, you are expected not to make (oral or written) agreements to reduce competition, such as agreeing:

- Customer prices or other business terms
- Allocation of customers or markets
- Prices or business terms to be imposed on suppliers
- The co-ordination or allocation of bids
- Boycotts or refusals to deal with certain competitors, customers or suppliers
- Limits on production.

This also means that obtaining or sharing confidential, commercially sensitive information with competitors, suppliers or customers may raise competition law concerns. Therefore, you are expected not to:

- Ask for, receive or share commercially sensitive information directly with competitors
- Request or receive commercially sensitive information about a competitor from a supplier or a customer
- Share our suppliers’ or customers’ confidential information with their competitors.

What is commercially sensitive information? Some examples are: prices, terms of sales, discounts, promotions, capacity, output, market share or information about the state of negotiations.

Some joint arrangements, such as joint purchasing, production, research and development, standardization and joint venture agreements are legitimate as they promote competition more than they reduce it. Nonetheless, the various competition laws vary widely with regard to the types of joint agreements that may be permissible. Therefore, you should submit each joint agreement proposal to Legal.
Lastly, this means that you are expected to ensure that participation in industry or trade associations meetings or events are not used for anti-competitive purposes. If you are taking part in an industry meeting, or if you wish or are asked to become a member of an industry or trade association, first ask for specific approval from your Line Manager and inform Legal.

Memberships are only allowed if the industry or trade association has sufficient safeguards in place to ensure competition law compliance, such as competition law guidelines available for all members and adequate secretarial procedures.

If you are taking part in a trade association or other industry meeting and inappropriate topics are raised, you must object immediately and leave the meeting. Ask that both your intervention and departure are clearly noted in the minutes of the meeting. All incidents of inappropriate discussions must be reported immediately to your Line Manager and to Legal.

In most jurisdictions it is unlawful for a supplier and a customer to agree on the price at which the customer will resell the supplier’s products. If you have any questions on how to deal with communications around prices with your customers (including distributors), contact Legal.

Please contact Legal for questions and guidance relating to Fair Competition within Ontex.
Sustainability

At Ontex, a leading supplier of personal hygiene products for both private label and branded markets, we believe that **sustainable business practices** contribute to genuine business success.

We strive for sustainable growth, offering our customers and consumers responsible products at an affordable price. In doing so, we aim to operate within the limits of our planet so that we can support the needs of the present and future generations. Moreover, we want to create a **positive impact in society and improve people’s lives** whenever we connect with them.

You play a key role in delivering these commitments.

**This means** that you are expected to:

- Ask yourself if a **more sustainable** option is possible when making decisions
- Act in line with our **environmental and social engagements**
- Contribute actively to supporting our sustainability strategy by **flagging potential issues** and communicating improvement potentials.

Please contact **Sustainability** for questions and guidance relating to Sustainability within Ontex.
At Ontex we embrace ethical behavior in all our business activities.

We act with integrity in our day-to-day collaboration with our customers, suppliers and other actual and potential business partners. Our decisions are driven by fairness and by what is the right thing to do and are based on objective grounds.

We avoid any conflict of interest and have zero tolerance of corruption in any form.

- Conflicts of Interest
- Anti-Bribery and Corruption
- Gifts and Hospitality
- Anti-Money Laundering
- Economic Sanctions
- Community Involvement

When a company acts with integrity, it builds trusting relationships with employees and customers. Its reputation rises as a result, positively affecting productivity and sales.

*Thierry Navarre*
*Chief Operating Officer*
Conflicts of Interest

A **conflict of interest** happens whenever your personal, social, financial or political interests influence or interfere with your business decisions.

Conflicts of interest can have a significant negative impact on our **reputation and effectiveness** as a company and as individuals.

**This means** that you are expected **to act in our best interests at all times and avoid any conflict**, or any appearance of a conflict, with Ontex’s interests, such as:

- Engaging in activities that directly or indirectly compete with Ontex activities
- Letting your decisions as an Ontex employee be influenced by personal or family interests or friendships
- Using Ontex property, information or other resources for your personal benefit or the benefit of others
- Having outside employment or other activities that negatively impact your job performance or interfere with your responsibilities at Ontex.

**Please contact** HR for questions and guidance relating to Conflicts of Interest within Ontex.
Anti-Bribery and Corruption

At Ontex we **fully comply with all anti-bribery laws** in place in the markets in which we operate. We will not engage in illegal or unethical practices and will not accept business if it requires giving or receiving a bribe.

**This means** that you are expected:

- **Not to offer, promise, give, accept, agree to receive, or seek a bribe** (whether for yourself or for Ontex) of any kind in return for a favorable treatment or to gain any business advantage for yourself or for Ontex.

- **Not to make facilitation payments** of any kind, even to secure an action that is a matter of routine.

- **Not to use cash payments** to pay suppliers’, customers’ and other business partners’ invoices, commissions, discounts or rebates, nor to accept cash or cash equivalent in relation to Ontex’s business.

- To always be mindful of what the payment is for if you are asked to make or receive a payment on the behalf of Ontex, and whether the **amount requested is proportionate** to the goods or services provided and constitutes a legitimate business dealing which is proportionate to the terms of the agreement in place.

- **To register every supplier, customer or other business partner** in SAP, Oracle, or any other financial system or tool in place in your country for the registration of business partners.

A bribe is a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, products, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery (or corruption) generally includes offering, promising, giving, accepting, agreeing to receive, or seeking a bribe. It can take place in both the public and private sector and can be direct or indirect through third parties.

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official (e.g. obtaining permits, licenses or documents, processing governmental papers such as visas, or loading or unloading cargo).
Look out for certain ‘red flags’ that may indicate a risk of bribery or other form of corruption prior to entering into any contract or providing any services to a customer, supplier or other business partner.

**Examples** of red flags include a request to pay in cash, a request to be paid via an unknown third party or in a third country, fees that are out of proportion to the product or service provided or refusal to put terms agreed in writing.

If any such red flags exist, do not proceed and please notify your [Line Manager](mailto:line.manager@ontex.com) or [Compliance](mailto:compliance@ontex.com), as an inquiry must be launched to verify whether the transaction is permissible or not.

Please contact [Compliance](mailto:compliance@ontex.com) for questions and guidance relating to Anti-Bribery and Corruption within Ontex.
Gifts and Hospitality

**Gifts** are items voluntarily given without payment in return.

**Hospitality** covers meals (breakfast, lunch or dinner) and events (such as theater, sporting events, concerts, invitations to restaurants or cocktails) taking place between you and an actual or potential customer, supplier, business partner or other third party.

At Ontex we believe that receiving or offering gifts and hospitality helps building **solid and trustful business relationships**.

However we must ensure that the exchange of gifts and hospitality between employees or any people acting on our behalf and customers, suppliers or other business partners is **not excessive** and is **not an actual or perceived bribe**. Business decisions must be made on their merits and must not be inappropriately influenced.

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In order to determine what is acceptable and what cannot be accepted you are expected to exercise **good judgment and moderation**. Accepting or offering any gift or hospitality, regardless of value, that either makes the recipient feel obligated or could be construed as a means to make the recipient feel obligated to start or continue a business relationship, cannot be accepted.

In order to help you assess the **reasonableness** of a gift or hospitality your offer or receive, please consult the **Maximum Monetary Values** on the Ontex intranet site.

All gifts (except those of low nominal value such as small promotional items) offered to you will be **donated to charity** in line with the guidelines in place at your Ontex location.
Ethics in our Business Activities

This means that you are expected:

- Before accepting or offering a gift or hospitality from/to an actual or potential customer, supplier or other business partner, to ensure that it:
  - Is reasonable
  - Does not impact your or another person’s independent judgment and objectivity in a business context
  - Is appropriate (e.g. adult entertainment is strictly prohibited)
  - Is accepted or provided in the normal course of an existing or prospective business relationship
  - Is intended for legitimate business purposes and is consistent with customary business practices

- To refuse to give or accept cash or any cash equivalent

- To refuse to give or accept gifts and hospitality while you or your business partner is involved in any stage of a competitive procurement or sales process

- To seek the written approval from your Line Manager for all gifts and hospitality which involve a public or government official

- When offering gifts or hospitality, to follow the applicable business expense process in place in your Ontex location and to retain and keep available all detailed documentation, including receipts.

A public or government official includes:
- An officer or representative of a government or of a government-owned or government-controlled entity
- A person representing a political party or public international organisation
- A candidate for political, municipal or judicial office.

Gifts: You are expected:

- To not give gifts which exceed the Maximum Monetary Value
- To politely decline gifts which appear to exceed the Maximum Monetary Value and explain that our policies prohibit you from accepting them. In exceptional situations where such gifts have to be accepted to avoid causing serious offense, you must notify your Line Manager.

Hospitality: You are expected:

- To respect the Maximum Monetary Value when inviting or being invited for hospitality
- To seek the written approval from your Line Manager when, in exceptional circumstances,
  - You seek to offer hospitality which exceeds the Maximum Monetary Value
  - You are invited to hospitality which appears to exceed the Maximum Monetary Value.

Please contact Compliance for questions and guidance relating to Gifts and Hospitality within Ontex.
Ethics in our Business Activities

Anti-Money Laundering

Money laundering occurs when people involved in criminal activity, such as terrorism, narcotics or corruption, hide the proceeds of their crimes or make them appear legitimate.

Most countries in which we do business strictly prohibit money laundering and make it a criminal offense to engage in transactions involving the proceeds of criminal activities.

At Ontex we are committed to complying with all applicable laws, rules, and regulations concerning the prevention of money laundering.

This means that you are expected:

- To look out for warning signs of customers, suppliers and other business partners potentially engaging in money laundering, such as when a supplier requests you to:
  - Pay funds to a bank account in the name of a different third party or outside the country of operation
  - Make payments in a form outside the normal terms of business
  - Split payments to several bank accounts
- Or when a customer requests to make, or executes payments:
  - In cash
  - From multiple bank accounts
  - Received by other third parties
  - Made in advance when not part of normal terms of business
  - Which exceed normal terms of business

- To ask your Line Manager or Compliance for guidance immediately if any such warning signs exist, as the transaction may need to be reported to the applicable authorities

- To register every customer, supplier or other business partner in SAP, Oracle, or any other financial system or tool in place in your country for the registration of business partners.

Please contact Compliance for questions and guidance relating to Anti-Money Laundering within Ontex.
Economic Sanctions

At Ontex we comply with all trade restrictions and economic sanctions rules.

**Economic sanctions** and **trade embargoes** are sanctions imposed by national governments or international bodies that restrict the conduct of business with governments, entities or individuals of certain countries.

**Economic sanctions can vary in scope:**
- The most comprehensive economic, trade and financial sanctions may prohibit exports or imports of goods, technology or services to or from sanctioned countries.
- Those more limited in scope may restrict trade by activity, items or to designated persons.

All such sanctions impose severe penalties and sanctions for trading with any of the identified sanctioned nations, individuals or entities.

**This means** that you are expected:

- To consult the Ontex intranet site to identify whether the counterparty is established in or has a link with an economic sanctioned country, entity or individual before entering into any new business with a customer, supplier or other business partner (contract with a new counterparty and/or in a new territory)

- Not to engage in any business, make any sales or exports, purchase or make any investments for the benefit of any supplier, customer or other business partner who is established in or has a link with an economic sanctioned country, entity or individual.

This also covers the case where you know or have a reason to believe that this supplier, customer or other business partner either intends to re-export or resell our products to, or has purchased material from a person, jurisdiction or government with which you would not engage directly.

Please contact Compliance for questions and guidance relating to Economic Sanctions within Ontex.
Community Involvement

At Ontex, as we want to create a positive impact in society and improve people’s lives whenever we connect with them, we encourage community involvement (including charitable donations).

At the same time we need to protect ourselves from unscrupulous appeals and possible misappropriation of funds.

We do not make any contributions or donations to political candidates or parties.

This means that you are expected to seek approval from Sustainability for all donation requests to ensure that they are in line with the guidelines in place.

Please contact Sustainability for questions and guidance relating to Community Involvement within Ontex.
Respecting Company Information

At Ontex we believe that protecting and properly using company resources, information and property contributes to our passion for integrity and creates value for our shareholders.

We take all necessary measures to protect the confidentiality of our company information as well as the information we receive from our consumers, customers, suppliers and other business partners.

- Confidential Information
- Social Media and Networks
- Company Assets
- Intellectual Property
- Personal Data and Privacy
- Insider Dealing

Confidentiality is a prime example of integrity in the workplace. It is also a legal necessity. We have an obligation to keep certain information private.

Jacques Purnode
Chief Financial Officer
Respecting Company Information

Confidential Information

At Ontex we ensure that all confidential, competitively sensitive and/or proprietary information about Ontex, our customers, suppliers, business partners and other third parties is properly protected.

This means that you are expected to:

• Respect the confidentiality of other companies’ information that is not in the public domain
• Assume that all information about Ontex is confidential or competitively sensitive unless you have clear indication that the information has been publically released
• Protect confidential information about Ontex at all times, including outside of the workplace and working hours, and after employment ends
• Refrain from sharing confidential information to anyone outside Ontex, including to family and friends, except when disclosure is strictly required for business purposes; even then, take all appropriate steps, such as signing a confidentiality agreement, to prevent misuse of the information
• Take all the necessary steps to protect documents and IT devices when away from the workplace.

Even within Ontex, only share confidential information on a strict need-to-know basis.

What is confidential or non-public information?

It is any information that a company has not disclosed or made generally available to the public.

Examples include information related to:

• Employees
• Inventions
• Contracts
• Strategic and business plans
• Major management changes
• New product launches
• Mergers and acquisitions
• Technical specifications
• Pricing
• Proposals
• Financial data
• Product costs

Please contact Legal for questions and guidance relating to Confidential Information within Ontex.
Social Media and Networks

At Ontex we support the use of social media and networks to **generate new business opportunities**, to recruit new talent and to promote and sell our brands.

However, in order to **protect our brands, image and reputation**, a limited number of employees are authorized to represent and to talk on behalf of Ontex on social media and networks.

**This means** that unless you are part of this limited number of employees, you are expected to:
- Share **only public news** relating to Ontex on your social media and networks
- Be **transparent** and state that anything you post is your own opinion.

In all cases when using social media and networks, you are expected not to:
- Share copyrighted publications, logos or other images that are protected by an **intellectual property right**
- Refer to Ontex or to your **co-workers** in an abusive or harassing manner, or violate their right to privacy.

Please contact **Communications** for questions and guidance relating to Social Media and Networks within Ontex.
Company Assets

Company assets include physical property such as facilities, supplies, computers and software, telephones, scanners, photocopiers, wireless communication devices, machinery, spare parts, raw materials, finished products, vehicles and company funds.

They also include intangible assets such as company time, confidential information and intellectual property.

At Ontex we use company assets **honestly and efficiently**.

**This means** that you are expected:

- To use company assets only for **legitimate business purposes** and protect them from theft (whether physical theft such as unauthorized removal of assets, or through intentional misreporting of time or expenses), loss, damage or misuse
- Not to use company assets for your **personal benefit** or the benefit of anyone other than Ontex.

This applies equally to company assets belonging to Ontex and to those belonging to our customers, suppliers and other business partners. We also treat assets belonging to other employees and people who act on our behalf the same way we treat company assets.

**Please contact** HR for questions and guidance relating to Company Assets within Ontex.
Respecting Company Information

Intellectual Property

At Ontex, an innovation company, we greatly value and invest in research and development, and the branding and marketing of our products.

We value and respect our own intellectual property rights, such as brands, trademarks, logos, designs, patents and inventions, as well as those of our customers, suppliers, business partners, competitors and other third parties.

This means that you are expected to:

• Use the intellectual property of others only with their explicit consent
• Use our intellectual property in line with the Ontex guidelines in place
• Never allow a third party to use our intellectual property without proper authorization or license agreement in place
• Ensure a contract is in place, which protects our intellectual property rights when undertaking collaborative work with third parties.

Please contact Legal for questions and guidance relating to Intellectual Property within Ontex.
Respecting
Company Information

Personal Data and Privacy

At Ontex we respect the **privacy of all individuals** and the **confidentiality of the personal data** we hold about them. We comply with all applicable laws regarding the collection, use and disclosure of personal data.

This means that you are expected to:

- Keep **private and protected** the personal data you have access to regarding our employees, people acting on our behalf, customers, suppliers, business partners, consumers or any other individuals.

- Collect, use or store personal data only if:
  - There is a **valid legal ground** to do so
  - It is **relevant and adequate** for the purpose for which it is collected
  - You keep it **up to date**; and only for
    - the timeframe which is necessary to meet the business objective
    - or as required by law

- Make sure you acquaint yourself with the applicable legal framework, share personal data only with **authorized parties**, and ensure the **protection and confidentiality** of those data when processing personal data.

**Personal data** means any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Please contact** Legal for questions and guidance relating to Personal Data and Privacy within Ontex.
Respecting Company Information

Insider Dealing

As part of your job you may become aware of ‘inside information’ about Ontex, our customers, suppliers, business partners or other third parties. At Ontex we **comply with all applicable insider trading laws and regulations**.

**Inside information** is information which has not been made public and which a reasonable investor would consider important in deciding whether to buy or sell shares and/or financial instruments.

This means that in case you are in possession of inside information about Ontex or another listed company, we expect you to:

- **Refrain from trading** in the shares of Ontex or that other company, nor recommend or encourage other persons to do so, nor share the inside information with colleagues or any third parties, including family members or friends
- **Ensure any inside information** you receive as a result of your involvement in a project remains strictly **within the project team**.

For the purposes of monitoring trading in Ontex shares by employees and people acting on our behalf, as well as managing inside information, we have adopted a **Dealing and Disclosure Code** which is available on the Ontex intranet site.

Please contact Legal for questions and guidance relating to Insider Dealing within Ontex.
Report Concerns

If you are aware of a violation or potential violation of our Values, our Code of Ethics, our policies or the law, we expect you to speak up immediately and report it so it can be addressed. By doing so, you give us the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and decrease trust.

Please refer to our Speak-up page on the Ontex intranet to know more about the speak up process. Your Line Manager or Compliance can answer any questions you may have.

What concerns can you raise?

You are encouraged to raise concerns about suspected unethical behavior or other misconduct and to report anything that you believe, in good faith, is based on trustworthy sources or data and may violate the law, our Code of Ethics and/or other internal policies and guidelines.

How can you raise a concern?

We provide several channels for raising concerns. You can report misconduct to:
• Your Line Manager
• Your Local Person of Trust
• Your Local Compliance Coordinator
• Group Compliance
• Your Global Internal Audit Manager

Is it possible to report anonymously?

You can share your concerns anonymously through the external Speak-up line (where allowed by the laws of your country). We do however encourage you to reveal your identity as it is more difficult, and in some circumstances even impossible, for us to investigate reports that are made anonymously. We will ensure that there will be no retaliation for reporting concerns in good faith.

We thank you for your attention and appreciate your commitment to acting with integrity at all times.
Contact Information

grpcompliance@ontexglobal.com