

A man in a blue Ontex shirt and hairnet is working in a factory. He is looking towards the camera. In the background, other workers in similar attire are visible, working on machinery. The scene is brightly lit, suggesting a clean and professional environment.

# OUR CODE OF ETHICS

## DOING BUSINESS THE ONTEX WAY

Caring  
for  
People

Integrity  
in the  
Market Place

Ethics  
in our Business  
Activities

Safeguarding  
Company  
Information





<b>A message from Esther Berrozpe, CEO</b>	<b>3</b>		
<b>Our Values</b>	<b>4</b>		
<b>How to use our Code of Ethics?</b>	<b>5</b>	<b>Integrity in the Market Place</b>	<b>11</b>
Whom does our Code of Ethics apply to?	5	Product Quality and Safety	12
Whom can you go to if you have a question about our Code of Ethics?	5	Responsible Marketing and Advertising	13
Where can you find additional policies and guidelines?	5	Fair Competition	13
What are your personal responsibilities?	6	Sustainability	15
What are the sanctions in case of breach?	6	<b>Ethics in our Business Activities</b>	<b>16</b>
		Conflicts of Interest	17
		Anti-Bribery and Corruption	18
		Gifts and Hospitality	19
		Anti-Money Laundering	21
		Economic Sanctions	22
		Community Involvement	22
<b>Caring for People</b>	<b>7</b>	<b>Safeguarding Company Information</b>	<b>23</b>
Anti-Discrimination	8	Proprietary Information	24
Anti-Harassment	8	Social Media and Networks	25
Professional Conduct	9	Company Assets	26
Occupational Health and Safety	9	Intellectual Property	26
Human Rights	10	Personal Data and Privacy	27
		Fairly Stated Records and Reporting	28
		Insider Dealing	28
		<b>Speak Up</b>	<b>29</b>
		<b>Contact Information</b>	<b>30</b>

## A MESSAGE FROM ESTHER BERROZPE, CEO

I am delighted to present the second version of our Code of Ethics. It sets the framework within which we have to act and operate in our daily work and, by doing so, contribute to the Ontex success story. The adjustments and additions to the previous version have been integrated based on life at Ontex. Our Code of Ethics is reflective of Ontex as a company and evolves in function of our learnings and experiences.

I strongly believe that behaving ethically is fundamental and that integrity must remain, just as our other corporate values (passion, reliability, drive, everyone) at the heart of what we do every day.

I expect from you, as I strive to each day, to act in business as you act at home or with friends and relatives, with honesty and in line with strong moral principles. I expect you to conduct our business in compliance with both the spirit and the laws that govern our industry. Our Code of Ethics is the Ontex guide which provides you with the framework within which you have the freedom to act and operate.

By always doing the right thing, you will help to build the trust and pride that is crucial to ensure our continued success as well as to prevent us from damaging our reputation and our future business.



Esther Berrozpe  
CEO Ontex



I strongly believe that **behaving ethically is fundamental** and that integrity must remain, just as our other corporate values, at the heart of what we do every day.

## 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.

In our Code of Ethics Ontex means the **Ontex** group of companies comprising Ontex Group NV and its subsidiaries. Your **Line Manager** means the Ontex employee you directly report to.

### Whom does our Code of Ethics **apply** to?

Our Code of Ethics applies to **all Ontex employees** wherever located: 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. We expect them to commit in their agreements with Ontex to the principles of our Code of Ethics, as well as to the laws and regulations applicable in the countries where they operate.

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

### Whom 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 in our Code of Ethics 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.

## HOW TO USE OUR CODE OF ETHICS?

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.



# CARING FOR PEOPLE



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 plants a great place to work where everyone can grow in trust and well-being 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.

## CARING FOR PEOPLE

### ANTI-DISCRIMINATION

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.

Employment decisions such as recruitment, redundancy, promotion, benefit or reward should always **be based on merit, qualifications and business considerations alone**.

**Please contact HR** for questions and guidance relating to Anti-discrimination within Ontex.



### ANTI-HARASSMENT

At Ontex, we **do not tolerate any form of harassment**, including physical, verbal, sexual or other harassment, abuse of authority or bullying. We promote a working environment where employees are mindful of respecting each other and interact with good intentions.

**This means** that you are expected not to engage in any behavior that is offensive, intimidating, malicious or insulting.

We expect you to:

- Help create a professional **work environment that is free of all forms of harassment** including sexual or mental harassment, disrespectful language, discriminatory gestures or physical violence
- Remember that **sexual harassment includes making offensive or sexually explicit jokes** or insults, distributing material of a sexually explicit nature, making unwanted sexual advances or requesting sexually oriented contact
- **Not tolerate nor encourage the creation of a hostile environment**, the isolation of colleagues or the spreading of malicious or insulting rumors.

**Please contact HR** for questions and guidance relating to Anti-harassment within Ontex.



## CARING FOR PEOPLE

### PROFESSIONAL CONDUCT

At Ontex, we **promote an open culture where people can be themselves**. We believe in authenticity and appreciate that our employees and the people acting on our behalf speak and act freely.

At the same time, we **do not tolerate disrespectful behaviors** and situations which can be perceived as offensive or inappropriate in a working environment.

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

- Maintain **high standards of professional conduct** at all times, including when working with clients, suppliers and other business partners, or in contacts with competitors, during and after business hours, in all business settings, inside and outside the Ontex premises
- Remain **reasonable in all business circumstances**, including at festive events where you are expected to adopt appropriate conduct. Be sensitive to actions or behaviors that may be acceptable in one culture but not in another
- **Not put yourself in a vulnerable position** where you or Ontex would suffer from a negative image. Always be mindful of your and Ontex's reputation.

**Please contact HR** for questions and guidance relating to Professional Conduct within Ontex.

### OCCUPATIONAL HEALTH AND SAFETY

At Ontex we are committed to **maintaining a safe and healthy work environment** for our employees, visitors and contractors. We all share the responsibility to make safety and health our daily priority and aim for zero work-related injuries and illnesses.

We **support each other** in actions to work safely and in good health by using available resources and observing recommended practices.

We **implement preventive measures** to address risk areas, and we take corrective action in a timely manner when we become aware of an unsafe or hazardous situation.

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

- Comply with the **prescribed safety rules and instructions** relevant to your role
- **Set the example** for those you work with
- Raise any concerns about potential health and safety risks or unsafe work conditions and **promptly report** any accidents and work-related injuries and illnesses
- Take **personal responsibility** for your own health and safety and for those of others. Do not undertake work or related activity if you believe it is unsafe or harmful for you or for others, such as engaging in work under the influence of alcohol or drugs.

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

## CARING FOR PEOPLE

### 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 and we expect our customers, suppliers and other business partners to uphold these core principles as well. This includes the **prohibition of child labor, forced labor, and human trafficking**.

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

- Ensure that your actions respect the **basic human rights principles**
- Build **strong partnerships** with trusted suppliers, customers and business partners 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.



# INTEGRITY IN THE MARKET PLACE



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.

## INTEGRITY IN THE MARKETPLACE

### PRODUCT QUALITY AND SAFETY

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

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.

We are mindful of the **health and safety of our consumers**. Therefore, we evaluate and substantiate the safety of our raw materials and products through sound scientific studies.

We ensure that our products **comply with the legal and regulatory requirements** related to product safety and labeling in markets around the world.

**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 by actively contributing in problem solving and process improvement reviews
- Follow the applicable **approval procedures** to ensure that our products are in line with applicable legal and regulatory requirements before launching them in a market

- Actively contribute to achieving the established **quality goals and objectives**, by giving transparent and open feedback on quality results to the business, based on facts and data.

**Please contact Quality or Product Stewardship** for questions and guidance relating to Product Quality and Safety within Ontex.





## INTEGRITY IN THE MARKETPLACE

### 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 and brands, 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 and regulatory guidance** when in doubt about the truthfulness and legality of an allegation or claim (on the packaging of our products or in other communications relating to our products).

**Please contact Communications** for questions and guidance relating to Responsible Marketing and Advertising within Ontex.



### 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 coordination or allocation of bids
- Boycotts or refusals to deal with certain competitors, customers or suppliers
- Limits on production.

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, you should submit each joint agreement proposal to **Legal**.

## INTEGRITY IN THE MARKETPLACE

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.

Lastly, this means that you are expected to **not take any action to take unfair advantage of customers or unfairly prevent competitors from entering, remaining or expanding in a market**. In some cases, selling below cost, agreeing on certain types of conditional rebates or concluding exclusivity arrangements may raise concerns.

If you have any doubt, please contact **Legal**.

Ensure that participation in **industry or trade association meetings or events** is 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** as 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), and if you are trained in competition law risks
- If inappropriate topics are raised, object immediately and leave the meeting. Ask that both your objection and departure are clearly noted in the meeting minutes. Report all incidents of inappropriate discussions 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.

## INTEGRITY IN THE MARKETPLACE

### SUSTAINABILITY

At Ontex, as a leading supplier of affordable personal hygiene products, we believe that **sustainable business practices** contribute to genuine business success. We have an opportunity and an obligation to drive positive change. We are committed to achieving climate neutral operations by 2030 and moving towards a circular business model.



We want to create a **positive impact in our supply chain and regenerate natural resources**. We aim to enhance transparency and lead the way to a fair society.

By mobilizing our employees, suppliers, customers, other business partners and consumers, we aim to actively contribute to the achievement of the **United Nations Sustainable Development Goals**.

You play a key role in delivering these commitments.

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

- **Understand what sustainability means within Ontex** and which goals and objectives we have set ourselves
- Take **ownership** for and work according to all relevant strategies, policies, procedures and instructions to ensure the sustainability strategy is well embedded in the organization
- **Report and deal appropriately** with the occurrence of any non-conformity, environmental, social or occupational safety hazards or incidents
- Support us in **driving continuous improvement** through all processes and instructions
- Actively contribute to **achieving the established sustainability goals and objectives**. Always ask yourself if a more sustainable option is possible when taking decisions, such as, for example:
  - Have you shared the sustainability strategy and goals with your stakeholders?
  - When an equipment needs to be changed, have you taken the energy consumption or impact on production waste into account?

**Please contact Sustainability** for questions and guidance relating to Sustainability within Ontex.

# ETHICS IN OUR BUSINESS ACTIVITIES



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 no tolerance for corruption in any form.



## ETHICS IN OUR BUSINESS ACTIVITIES

### CONFLICTS OF INTEREST

A **conflict of interest** happens whenever a personal, social, financial or political interest influences (or may influence) or interferes (or may interfere) with your business decisions, even if you are acting in the best interest of Ontex.

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 Ontex's best interests at all times and avoid any conflict of interest**, or any appearance of a conflict of interest, such as:

- Engaging in activities that directly or indirectly compete with Ontex activities
- Letting your decisions as an Ontex employee, including in your relationships with (potential or actual) customers, suppliers and other business partners, 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 **notify your Line Manager** whenever you engage in activities or employment outside of Ontex.

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



## ETHICS IN OUR BUSINESS ACTIVITIES

### 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.

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).

**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 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 the financial system or tool in place in your country for the registration of business partners.

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** or **Compliance**, as an inquiry must be launched to verify whether the transaction is permissible or not.

**Please contact Compliance** for questions and guidance relating to Anti-Bribery and Corruption within Ontex.

## ETHICS IN OUR BUSINESS ACTIVITIES

### 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) offered by you or 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.

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

**Public or government officials** include

- Regulators
- Tax or customs officials
- Officers or representatives of governments or of government-owned or government-controlled entities
- Politicians and employees of public international organizations
- Candidates for political, municipal or judicial offices.



## ETHICS IN OUR BUSINESS ACTIVITIES

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 you 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.



**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 offered 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, organized crime, 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 that differs from 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 the 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.

## ETHICS IN OUR BUSINESS ACTIVITIES

### ECONOMIC SANCTIONS

**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 countries, individuals or entities.

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

**This means** that you are expected:

- To consult **Compliance** if you have any **doubt, suspicion or indication that a (potential or actual) counterparty is under any sanction** or has a link with a sanctioned country, entity or individual
- To **consult the list of high risk countries** (published on the Ontex intranet site) before entering into any new business with a customer, supplier or other business partner to identify whether the counterparty is established in or has a link with a high risk country and to reach out to **Compliance** in case of questions
- Not to engage in any business, make any sales, exports, or purchases, or make any investments for the benefit of any supplier, customer or other business partner who is **established in or has a link with a high risk country**, without prior approval from **Compliance**.

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.

# SAFEGUARDING 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 all our constituencies.

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.

## SAFEGUARDING COMPANY INFORMATION

### PROPRIETARY INFORMATION

At Ontex we ensure that **all proprietary information** of Ontex, our customers, suppliers, business partners and other third parties is **properly protected** from all threats, whether internal or external, deliberate or accidental.

We aim to be recognized as an organisation adhering to the **highest level of information security**. We ensure business continuity and minimize business damage by preventing and minimizing the impact of security incidents relating to proprietary information stored on computers, mobile phones or any other devices, transmitted across networks, stored on removable media, printed or written on paper, spoken in conversation and over the telephone.

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

- Not disclose **other people's proprietary information**, even if it is not explicitly marked as confidential or proprietary
- Treat all proprietary Ontex information as **confidential information**, unless you know that the information has been released for public use
- Take appropriate measures **to protect proprietary information as well as devices containing proprietary information** at all times, whether in- or outside of the workplace, during or after working hours, and even after your employment at Ontex ends
- Sign a **confidentiality agreement every time you receive proprietary information** from a third party or intend to disclose proprietary Ontex information to a third party
- Consider carefully whether it is **absolutely necessary to share proprietary information** outside of the circle in which that information was shared with you, even within the Ontex organization
- Refrain from sharing proprietary information to **family and friends**

- Not **share passwords** with anyone nor **leave Ontex laptops and mobile devices unattended** while traveling or in an exposed location where they can be stolen
- **Not download any unauthorized or unlicensed software** on Ontex devices
- **Report promptly** all (actual or potential) leakage of proprietary information, including the loss or theft of a laptop or mobile device.

#### What is proprietary information?

All information that a person or company has generated is considered as proprietary information for as long as it has not been released for public use.

Examples include information related to:

- Employees
- Inventions
- Contracts
- Strategic and business plans
- Organizational changes
- Product launches
- Mergers and acquisitions
- Technical specifications
- Pricing
- Contract proposals
- Financial data
- Raw material and product cost

**Please contact IT Security** for questions and guidance relating to how Proprietary Information is used and protected within Ontex.



## SAFEGUARDING COMPANY INFORMATION

### SOCIAL MEDIA AND NETWORK

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.



## SAFEGUARDING COMPANY INFORMATION

### 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, proprietary information and intellectual property.

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

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.

**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** unless expressly authorized to do so in Ontex policies, such as the private use of computers and mobile phones
- Not to use company assets for the **benefit of anyone other than Ontex**
- Not to use company assets to engage in **illegal or inappropriate activities** which could damage Ontex
- To submit **expenses for reimbursement** only if they are **business-related**, properly documented and if they comply with our policies.

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

### INTELLECTUAL PROPERTY

At Ontex, 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, know-how 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 to protect our intellectual property rights when undertaking collaborative work with third parties.

**Please contact Legal** for questions and guidance relating to Intellectual Property within Ontex.

## SAFEGUARDING 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, store or generally process personal data only if:
  - There is a **valid legal basis** to do so
  - You are **transparent** with individuals in relation to how their personal data is collected and used
  - You obtain **consent** from individuals to process their personal data when applicable
  - It is **relevant and adequate** for the purpose for which personal data is collected and use it solely for that purpose
  - You keep personal data **up to date** and only for the timeframe which is necessary to meet the business objective or as required by law
  - You protect personal data from possible **loss, misuse or disclosure**
  - You respect the **legal rights of individuals** by giving them access to their personal data and by letting them rectify, delete, transport or restrict their personal data
- Share personal data only on a **need-to-know basis with authorized persons**. Do not share personal data with unauthorized persons outside Ontex or with anyone within Ontex whose function does not require to know such information.

**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.



## SAFEGUARDING COMPANY INFORMATION

### FAIRLY STATED RECORDS AND REPORTING

At Ontex we keep the information in financial reports, books and records, as well as information in agreements, presentations, spreadsheets and in any other business document, **truthful and complete**.

We believe that **fairly prepared statements, recordkeeping and reporting** does not only allow us to meet our legal and regulatory obligations, but also to contribute to maintaining our reputation and credibility.

**This means** that you are expected:

- To **record** all transactions accurately, completely and promptly
- To only enter into a transaction after it is **legitimately approved** in line with the applicable policies and guidance in your location
- To follow **applicable reporting standards and regulations** if you are involved in reporting financial and other business information
- To **promptly notify any potential fraud**
- To **co-operate** fully and honestly with internal and external auditors, tax authorities and other regulators
- To ensure estimates and accruals are supported by **appropriate documentation**
- To retain records and documents in line with the **applicable retention periods**, or for a longer time period if requested to do so, for example for the sake of an ongoing audit, litigation or regulatory investigation.

**Please contact Finance** for questions and guidance relating to Fairly Stated Records and Reporting within Ontex.

### 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.



## SPEAK UP



### 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 site 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 (if such person has been appointed in your location)
- Your Local Compliance Coordinator
- Group Compliance
- Internal Audit
- Our external Speak up line (via email or by phone).

### IS IT POSSIBLE TO REPORT ANONYMOUSLY?

You can share your concerns anonymously (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.

### NO TOLERANCE FOR RETALIATION AND MALICIOUS ALLEGATIONS

We will not tolerate any form of retaliation against employees who report concerns in **good faith** or who participate in all honesty in an investigation. We expect employees who raise concerns to only provide information they believe is complete and truthful. We will take disciplinary actions against employees who retaliate as well as against employees who knowingly make a clearly malicious allegation.

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

## CONTACT INFORMATION

In addition to your **Line Manager**, you can contact people in the **specific department** within Ontex that has particular expertise in each subject of our Code of Ethics. They are noted in each chapter.

You can either contact the **local departments** or reach out to the **group departments**:

**Communications:** [corporate.communications@ontexglobal.com](mailto:corporate.communications@ontexglobal.com)

**Compliance:** [grpcompliance@ontexglobal.com](mailto:grpcompliance@ontexglobal.com)

**Finance:** [finance@ontexglobal.com](mailto:finance@ontexglobal.com)

**Health & Safety:** [healthandsafety@ontexglobal.com](mailto:healthandsafety@ontexglobal.com)

**IT Security:** [security@ontexglobal.com](mailto:security@ontexglobal.com)

**HR:** [hraalst@ontexglobal.com](mailto:hraalst@ontexglobal.com)

**Legal:** [grplegalmail@ontexglobal.com](mailto:grplegalmail@ontexglobal.com)

**Quality:** [quality@ontexglobal.com](mailto:quality@ontexglobal.com)

**Sustainability & Product Stewardship:** [sustainability@ontexglobal.com](mailto:sustainability@ontexglobal.com)

