



# Code of Ethics

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## Message from our CEO

At Ontex, doing the right thing inspires the pride we take in our work, every single day.

Our Code of Ethics is a reflection of who we are and what we stand for. It brings together the values that guide us: *Passion, Reliability, Integrity, Drive, and Everyone*, and reflects our broader promise to be a company where our people live these values every day, feel inspired to grow, and experience work that is both meaningful and rewarding.

This Code translates all of this into clear expectations for how we act, decide, and lead.

In a complex world where ethical decisions are not always straightforward, a clear Code of Ethics is essential. It outlines the principles and standards that shape decision-making across all roles and locations at Ontex.

The Code reflects our shared responsibility to act with integrity and to safeguard the well-being of our people, our customers, our partners, and our reputation.

As CEO, I am fully committed to living by this Code and expect the same commitment across the organization. Read it carefully. Ask questions if something is unclear. Speak up if something does not feel right. Ethics is not just a compliance requirement, it is the foundation of a culture we can all be proud of.

Thank you for your continued dedication and for doing your part in building a company we can all stand behind.

*Gustavo Calvo Paz*  
Chief Executive Officer  
Ontex Group

## Our shared responsibility



The Code of Ethics applies to all employees, managers, and directors of Ontex and its subsidiaries.

In addition, Ontex expects its suppliers, contractors, consultants, distributors, and other business partners to respect and uphold the principles set out in this Code as specifically set in our Supplier Code of Conduct.

This Code of Ethics is built on compliance with all applicable local laws and regulations in every country where we operate. In addition, it reflects our own values and principles, which may establish expectations towards our employees and our partners that go beyond legal requirements to promote integrity, transparency, and responsibility in all we do.

If you see or suspect something that doesn't feel right and that it could be a potential violation to our Code, it's easy to speak up. You'll find clear instructions on how to raise a concern at the end of this Code.

Remember: raising a concern helps protect all of us, and you will not face retaliation for doing so in good faith. Raising concerns helps protect our people, our company, and our values — and you will be supported for doing so.

All employees must complete the mandatory training on this Code. Be sure to do so, and reach out to the functions mentioned at the end of each section or to Compliance if you have any questions or need guidance.



A. A safe & respectful workplace

## 1. Professional conduct

We value both authenticity and professionalism. Open expression is encouraged, as long as it goes hand in hand with mutual respect and consideration for others.

Acting with **integrity and respect**, whether in the workplace, at events, or in social settings, helps foster a positive and inclusive environment.

**Everyone contributes to this by:**

- > Behaving in a professional and respectful manner in all interactions.
- > Being mindful of cultural differences and the impact of one's words and actions.
- > Looking after both personal and Ontex's reputation in every context.

| [Contact HR for questions on professional conduct.](#)

## 2. Anti-discrimination

Ontex is committed to building a diverse and inclusive workplace where **everyone** feels respected, valued, and treated fairly.

Discrimination, based on age, gender, ethnicity, religion, disability, sexual orientation, or any other protected characteristic, has no place in our organization.

**To uphold this commitment, we expect everyone to:**

- > Base employment decisions on merit, qualifications, and business needs.
- > Support equal pay for equal work and ensure fair treatment for all.

| [Contact HR for guidance on anti-discrimination.](#)

## 3. Anti-harassment

Harassment, bullying, or abuse of any kind, verbal, physical, or sexual, has no place at Ontex.

We foster a culture of respect in all interactions, at every level of the organization

**Everyone is expected to:**

- > Avoid behavior that is offensive, intimidating, or inappropriate.
- > Be aware that harassment can include unwelcome advances, inappropriate jokes, or the spread of harmful rumors.
- > Speak up when witnessing hostile or isolating behavior.

| [Contact HR for guidance on anti-harassment.](#)

## 4. Occupational health and safety

At Ontex, we are 'Proud to be safe': committed to providing a safe and healthy working environment for all employees, contractors, and visitors.

Safety and health are shared responsibilities, and everyone has a role to play in making them part of everyday working life.

Our ambition is clear: zero work-related injuries and illnesses; a safe and healthy environment helps everyone perform at their best and feel truly supported at work

We support each other in working safely and maintaining good health by following recommended practices, using available resources, and implementing preventive measures in high-risk areas. When unsafe or hazardous conditions are identified, we strive to respond quickly and responsibly.

To ensure peak performance and safety, we expect everyone to contribute to maintaining a substance-free workplace.

To uphold this commitment, everyone is expected to:

- > Follow all relevant health and safety laws, policies, and procedures applicable to their role.
- > Lead by example and promote safe behavior among colleagues.
- > Report any health or safety concerns, risks, accidents, or work-related injuries or illnesses without delay.
- > Take personal responsibility for their own safety and that of others and avoid tasks they believe may pose a risk.
- > Never work under the influence of alcohol or drugs that could compromise safety or performance. The sale or distribution of drugs, including prescription medications, is not permitted while working for Ontex, whether on or off company premises.

For guidance or questions, the **health & safety team** or their designated local representative is always available to help

## 5. Workplace violence

Ontex is committed to maintaining a safe and respectful workplace, free from any form of violence. Threats, abuse, or any form of violent behavior have no place in our working environment.

To support this commitment, everyone is expected to:

- > Never carry or store weapons on company premises.
- > Promptly report any threats or incidents that may put the safety of others at risk.

Contact **HR** for guidance on workplace violence.

## 6. Human rights and labor conditions.

At Ontex, respect for internationally recognized human rights and the promotion of fair working conditions are core commitments, both within our own operations and across our value chain.

Our approach follows the United Nations Guiding Principles on Business and Human Rights, as well as other global standards for responsible business conduct. For more information, please refer to our **Human Rights Policy**.

We are committed to fostering a workplace that respects and upholds the dignity, rights, and well-being of every employee.

Within our own operations, we strictly prohibit all forms of modern slavery, including forced labor, human trafficking, and child labor, as well as any degrading, inhumane, or exploitative treatment.

We promote fair and safe working conditions, equal opportunities, and ethical conduct at every level of our organization.

In line with our human rights commitment, we do not employ anyone below the minimum legal working age, and we ensure that all young workers are protected from conditions that could harm their health, safety, or development.

This is a fundamental part of our broader duty to safeguard every individual's rights and well-being in the workplace.

While our primary responsibility lies with our own workforce, we also expect our business partners to share and reflect these values in their operations.

Specific expectations for suppliers and other partners are detailed in our **Supplier Code of Conduct**.

| [Contact sustainability for guidance on human rights and labor conditions.](#)

## 7. Community involvement and donations

Ontex is dedicated to be 'Here for the better', by supporting local communities and charitable initiatives.

To ensure all donations are transparent and aligned with our values, make sure you follow our specific guidelines on donations.

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

Donations should:

- > Be approved by the **compliance** and **sustainability** teams.
- > Be properly documented to maintain full transparency.

| [For guidance, contact compliance or sustainability.](#)

## 8. Social media platforms

At Ontex, we encourage the responsible use of social media to build new business opportunities, attract talent, strengthen our brand reputation, and celebrate our people and their achievements, sharing the passion, drive and care that define Ontex.

Employees are welcome to represent Ontex on social media, while keeping in mind the importance of protecting our brand, image, and reputation, and complying with applicable laws and regulations.

To do this responsibly, everyone is expected to:

- > Be respectful in all communications.
- > Be honest and transparent.
- > Be mindful of the content shared.

This includes:

- > Sharing only publicly available or approved news relating to Ontex.
- > Being transparent and clearly stating when opinions expressed are personal.

- > Disclose one's affiliation with Ontex (e.g., as an employee or contractor) when discussing Company-related topics.

At the same time, it is important:

- > Do not share copyrighted publications, logos, or other materials protected by intellectual property rights without authorization.
- > Do not make abusive, harassing, or privacy-violating references to Ontex, colleagues or partners.
- > Do not violate any applicable laws, regulations, or Ontex's internal policies when using social media.
- > Remember that all social media activity – **also non-business or Ontex related** – can affect Ontex's reputation and workplace environment. Employees are expected to post responsibly and avoid content that conflicts with our values or this Code of Ethics.

For guidance, please contact [corporate communications](#).



B. Integrity in our  
business activities

## 9. Responsible marketing and advertising

Our products are part of millions of lives each day. That's why all product communications must be **honest, clear, respectful, and compliant with the law**.

Everyone involved is expected to:

- > Represent product features and benefits accurately.
- > Support all claims with reliable and transparent testing or evidence.
- > Use truthful, non-misleading language in advertising and packaging.
- > Be familiar with and follow applicable legal and regulatory regulations.
- > Obtain any required legal or regulatory approvals before making any product claims in packaging, sales, or marketing materials.

If you have any questions or need support, please reach out to your **marketing lead or legal**.

## 10. Product quality and safety

At Ontex, we are dedicated to delivering high-quality, safe, and hygienic solutions that meet the expectations of our consumers, customers, and society.

We strive for **continuous improvement** in our products and processes, with a strong focus on **business excellence** and **consumer health and safety**.

This includes carefully evaluating the safety of raw materials and finished products using sound scientific methods and ensuring full compliance with all applicable **legal and regulatory requirements** worldwide.

Everyone is expected to:

- > Follow all **policies, procedures, and instructions** related to product quality and safety, in line with the Ontex Quality Policy and Manual.
- > **Report** any non-conformities or product-related complaints promptly and handle them appropriately.

- > Support **continuous improvement** by actively participating in problem-solving and process reviews.
- > Ensure that products meet all legal and regulatory requirements **before** launch in any market.
- > Contribute to Ontex's quality goals by sharing **transparent, fact-based feedback** on quality performance.

For guidance or questions, please contact the **quality or product stewardship teams**.

## 11. Environmental responsibility

At Ontex, we are dedicated to minimizing environmental impact across our value chain and embedding scalable sustainability practices into our products and operations.

We follow science-based climate targets, support responsible sourcing, promote circular economy principles, and engage openly with stakeholders to drive continuous improvement.

This commitment relies on everyone's participation through:

- > Understanding and following Ontex's sustainability goals relevant to their role.
- > Complying with environmental laws and voluntary standards.
- > Taking steps in daily activities to reduce environmental impact (e.g., conserving energy, managing resources wisely, minimizing waste, choosing sustainable sourcing, etc.).

- > Reporting any environmental risks, incidents, or opportunities for improvement.
- > Participating in sustainability training and initiatives.
- > Encouraging partners to share and uphold Ontex's environmental commitments.
- > Choosing environmentally responsible options when purchasing or using materials, equipment, or services.

| For guidance, contact the [sustainability team](#).

## 12. Fair competition

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

Moreover, investigations by competition authorities can lead to significant fines, increased costs, and reputational damage.

When interacting with competitors, everyone is expected to refrain from making agreements or arrangements, whether oral or written, that could reduce competition. This means avoiding coordinating or aligning on:

- > Customer prices or other business terms
- > Allocation of customers or markets
- > Prices or business terms to be imposed on suppliers
- > Coordination or allocation of bids

- > Boycotts or refusals to deal with certain competitors, customers or suppliers
- > Limits on production

Certain **joint arrangements**, such as joint purchasing, production, research and development, standardization and joint venture agreements may be legitimate when they promote competition more than they restrict it.

Nonetheless, all such joint agreement proposals should be submitted to the **legal department** for review.

Sharing confidential, commercially sensitive information with competitors, suppliers or customers may raise competition law concerns.

To avoid these risks, the following actions are not permitted:

- > Requesting, receiving, or sharing **commercially sensitive information** with competitors, whether directly or through intermediaries.

- > Requesting or receiving **commercially sensitive information** about a competitor from a supplier, a customer or any other party.
- > Sharing confidential information from our suppliers or customers, especially with their competitors.

Examples of **commercially sensitive information** include prices, terms of sales, discounts, promotions, production capacity, output, market share, or details about ongoing negotiations.

Everyone is expected to avoid actions that take unfair advantage of customers or unfairly prevent competitors from entering, remaining or expanding in a market.

In some cases, selling below cost, agreeing to specific conditional rebates or entering into exclusivity arrangements may raise competition concerns.

In addition, participation in **industry or trade association meetings or events** must also be handled carefully to prevent anti-competitive behavior. If you are taking part in an industry or trade association meeting, or if you wish or are asked to become a member of an industry or trade association:

- > Before joining, request specific approval from the **compliance team**. Memberships is only allowed if the industry or trade association has sufficient safeguards for competition law compliance (such as accessible competition law guidelines for all members and proper secretarial procedures), and if appropriate training has been completed.
- > If inappropriate topics arise during a meeting, it is important to object immediately and leave the meeting.

Ask that both the objection and departure are clearly noted in the meeting minutes. Report all incidents of inappropriate discussions immediately to your **Line Manager** and **legal** and/or **compliance**.

Finally, 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** and/or **compliance** for questions and guidance relating to **fair competition** within Ontex.

## 13. Anti-money laundering

Money laundering involves disguising the origins of money from criminal activity, and it is illegal in most countries where we operate.

At Ontex, we are committed to full compliance with anti-money laundering laws and regulations.

Everyone is expected to:

- > Be alert to red flags such as requests to:
  - Pay to unrelated third-party accounts or overseas accounts.
  - Use unusual payment methods or split payments.
  - Accept or make large cash payments, or payments outside standard terms.
- > Immediately report any concerns to their **Line Manager** or **compliance**.
- > Ensure all customers, suppliers, and partners are duly registered in Ontex's designated tools in compliance with applicable policies and procedures.

| For guidance, please contact **finance**.

## 14. Conflicts of interest

At Ontex, acting in the company's best interest means avoiding situations where personal, financial, or social interests could influence, or appear to influence, business decisions.

Everyone is expected to:

- > Disclose promptly any personal, family, or financial interests that could influence, or appear to influence, your business decisions.
- > Avoid personal gain from your role at the Company, including preferential treatment of suppliers, customers, or partners.
- > Separate business and personal relationships, especially when hiring, awarding contracts, or managing vendors.

Seek guidance from **compliance** or **legal** whenever in doubt about a potential conflict.

If you have any doubts or believe you may have a potential conflict of interest, notify your **Line Manager**. If you are aware of a potential conflict of interest within Ontex, notify **compliance**.

| Contact **compliance** for guidance on **conflicts of interest**.

## 15. Gifts and hospitality

At Ontex, we recognize that modest gifts and hospitality can help build strong business relationships, but they must never influence, or appear to influence, business decisions. We encourage everyone to inform business partners of our policy to help prevent inappropriate gifts or hospitality offers.

Everyone is expected to:

- > Ensure that all gifts and hospitality are **reasonable, appropriate, and serve legitimate business purposes**.
- > Avoid anything that could compromise objectivity or create a **conflict of interest**.
- > Never offer or accept **cash or cash equivalents**.
- > Refrain from giving or receiving gifts and hospitality **during tenders or negotiations**.
- > Follow Ontex's **expense and approval policies**, and retain all relevant documentation (e.g., receipts) in accordance with such policies.
- > Get approval from **compliance** before offering any gift or hospitality to a government official as is prohibited in most countries.

**Good judgement is essential.** If a gift or invitation could make someone feel obligated or biased, it must not be accepted or offered, regardless of its value.

**Consult the Maximum Monetary Values** on the Ontex intranet to assess if a gift or hospitality is within policy limits.

### Gifts

Modest, infrequent gifts and hospitality may be acceptable when they:

- > Serve a clear and legitimate business purpose.
- > Are reasonable in value and timing.
- > Are not intended to influence decisions or secure favorable treatment.

Remember to:

- > Decline any gifts exceeding the allowed value and explain our policy.
- > If refusing a gift would cause serious offense, notify your **Line Manager** and **compliance**. If approved for receipt, the item should be donated to charity where appropriate.

### Hospitality

- > Should remain within established monetary limits and requires written approval from the Line Manager if it exceeds those limits, whether offered or received.

Contact [compliance](#) for guidance on gifts and hospitality.

## 16. Anti-bribery and anti-corruption

At Ontex, bribery and corruption are completely unacceptable. We are committed to conducting business ethically, transparently, and in full compliance with all applicable anti-corruption laws, wherever we operate.

**Bribery** means offering, giving, receiving, or soliciting anything of value to improperly influence a decision or gain an unfair advantage. This includes not only cash, but also gifts, hospitality, loans, discounts, jobs, or any other personal or business benefit.

**Corruption** is a broader concept that covers the abuse of entrusted power for personal or corporate gain, including fraud, extortion, or hidden conflicts of interest.

It is essential to **never**:

- > Offer, promise, give, request, or accept a bribe or kickback of any kind, whether directly or through a third party.
- > Make or approve facilitation payments, which are small, unofficial payments to speed up routine processes.
- > Use personal funds or those from third parties to bypass compliance rules.
- > Accept or offer anything that could influence a business decision or appear improper.
- > Misrepresent information in recommendations or falsify expense reimbursement claims for personal or corporate gain.

Everyone must always:

- > Record all payments and transactions accurately and transparently.
- > Ensure business partners are registered in approved internal systems and paid according to legitimate, written agreements.
- > Exercise caution when handling payments to make sure amounts are appropriate and reflect actual services or goods.

- > Conduct due diligence on third parties and confirm they uphold the same standards.

#### Watch for red flags

Certain behaviors or requests may indicate bribery or corruption risk. These include:

- > Requests for cash or payments to third parties not listed in the contract.
- > Fees that appear excessive or unrelated to actual work performed.
- > Reluctance to put terms in writing.
- > Pressure to 'speed things up' using unofficial means.
- > Lavish gifts or hospitality offered during decision-making processes.

If any of these signs arise, **do not proceed**. Report the situation immediately to a **Line Manager** or the **compliance team** for further guidance.

**Offering or accepting** cash or equivalents, or anything that could be seen as a bribe is strictly prohibited. Always follow Ontex's Gifts and Hospitality policy and obtain approval when required, especially when interacting with public officials.

#### When in doubt, ask!

If there is ever uncertainty about a payment, request, or business practice, seek advice from **legal** or **compliance**. Raising concerns early helps protect both individuals and Ontex.

Upholding our commitment to integrity is a shared responsibility. Together, we protect our people, our partners, and our reputation.

For guidance, please contact the **compliance team**.

## 17. Economic sanctions

**Economic sanctions and trade embargoes** are sanctions and restrictions imposed by national governments or international bodies that restrict business activities 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.
- > More targeted sanctions may restrict trade by activity, items or dealings with designated persons.

Violating these sanctions can result in **severe penalties**.

At Ontex, **compliance with applicable economic sanctions and trade embargoes** is a priority.

This means everyone is expected to:

- > Consult **compliance** before engaging with any potential business partner, such as suppliers, customers or others, especially if there is any doubt, suspicion or indication that the counterparty is connected to a sanctioned country, entity or individual.
- > Consult the **list of high-risk countries** (available on the Ontex intranet) before entering into any new business relationship 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 engage in any business, sales, exports, purchases, or investments involving suppliers, customers or other business partners linked to high-risk countries, without prior approval from **compliance**.

This also applies when there is knowledge or suspicion that this supplier, customer or other business partner either may **re-export or resell our products** to, or has purchased material from a person, jurisdiction or government with which direct business is prohibited.

Please contact **legal** and/or **compliance** for questions and guidance relating to **economic sanctions** within Ontex.

## 18. Gathering market information

We expect employees to stay informed about market trends and competitor activity, but always through legitimate and ethical means.

It is acceptable to use public or approved sources to understand the market landscape.

It is not acceptable to seek non-public or **competitively sensitive information**, such as competitor pricing, product strategies, or contract terms, through customers, suppliers, or personal contacts.

Never use dishonest, illegal, or unethical methods to obtain information.

Always seek approval from **legal** or **compliance** before using third-party market or pricing data.

Staying informed is important. How we gather information matters even more.

| Please contact **legal** and/or **compliance** for questions and guidance.

## 19. Fairly stated records and reporting

At Ontex, we are dedicated to ensuring that all financial reports, records, agreements, and business documents are accurate, complete, and truthful.

Fair and transparent reporting not only meets legal and regulatory requirements but also protects our reputation and builds trust.

Everyone is expected to:

- > Record all transactions accurately, promptly, and honestly.
- > Only proceed with transactions that are properly approved according to our internal policies and procedures.
- > Follow relevant reporting standards if involved in financial or business reporting.
- > Report any suspected fraud immediately.

- > Cooperate fully and honestly with auditors, tax authorities, and regulators.
- > Support estimates and accruals with appropriate documentation.
- > Retain records in line with applicable retention policies or longer if required (e.g., for audits or investigations).

| For guidance, please contact **finance**.

## 20. Insider trading and other market abuse rules

As part of everyone's role at Ontex, there may be occasions where '**inside information**' becomes known, whether about Ontex, our customers, suppliers, business partners or other third parties. Possessing such information comes with specific legal obligations. The violation of such rules can lead to serious personal civil and criminal liability and may damage both personal and company reputations.

Ontex is dedicated to complying with all applicable Insider Trading and other Market Abuse laws and regulations.

**Inside information** is information that:

- (i) relates directly or indirectly to a listed company (such as Ontex);
- (ii) has not been made public;
- (iii) is precise;
- (iv) would likely be seen by a reasonable investor as relevant in deciding whether to buy or sell shares and/or other financial instruments of the listed company (such as Ontex shares).

When in possession of inside information about Ontex or another listed company, everyone is required to:

- > Refrain from trading in the shares or other financial instruments (including bonds, stock options and shares acquired by you as part of a long-term incentive) of Ontex or that other company, nor recommend or encourage other persons to do so.
- > Not share the inside information with colleagues or any third parties (including family members or friends), other than as may be strictly required for purposes of their role and subject to the recipient having entered into stringent confidentiality obligations regarding the information.
- > Ensure that any inside information they receive as a result of their involvement in a project remains strictly within the project team in accordance with the guidance provided by the legal team.

If there is any doubt about the nature of certain information, the **legal team** must be consulted for clarification.

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

Please contact **legal** for questions and guidance on this topic.



## C. Safeguarding company assets

## 21. Use of company assets

At Ontex, we value and protect our assets, both tangible and intangible. These include everything from facilities, equipment, vehicles, supplies, funds, work time, confidential information, and intellectual property.

We strive to use all assets, whether they belong to Ontex or to our customers, suppliers, partners, or colleagues, honestly, responsibly, and for legitimate business purposes only.

### Everyone is expected to:

- > Use company resources efficiently and with care.
- > Protect assets from theft, loss, damage, or misuse.
- > Use them only for authorized business purposes.
- > Avoid using assets for personal benefit unless clearly allowed by policies (e.g., company car, phone, computer).
- > Never use company resources for illegal, inappropriate, or unauthorized purposes.

- > Submit only accurate and policy-compliant expense claims.

| For questions, contact the [legal department](#).

## 22. Intellectual property

Ontex values innovation and actively invests in developing and marketing proprietary products. This includes protecting our intellectual property (IP), such as trademarks, designs, patents, logos, and trade secrets, and respecting the IP rights of others.

### Everyone is expected to:

- > Use Ontex IP only in line with company policies.
- > Ensure third parties only use our IP with proper authorization or licensing.
- > Never use another party's IP without explicit permission or legal right to do so.
- > Secure appropriate contracts or agreements when sharing or co-developing IP with third parties.

| Questions? Contact the [legal - intellectual property team](#) for support.

## 23. Confidential information

At Ontex, protecting confidential information is essential to safeguarding our business and maintaining the trust of partners, customers, and colleagues.

Confidential information includes any non-public data that, if disclosed, could harm Ontex or benefit competitors, such as business plans, financial information, customer or supplier details, technical data, or contracts.

### Everyone is expected to:

- > Treat all non-public Ontex information as confidential unless clearly approved for public sharing.
- > Share confidential information strictly on a **need-to-know** basis, even internally.
- > Avoid discussing sensitive topics in public places, unsecured environments, or through personal devices.
- > Never share confidential information with friends or family.

- > Follow Ontex's document retention guidelines before discarding any material.
- > Respect the confidentiality of third-party information, even if it is not labeled as confidential.

Confidentiality obligations continue even after leaving Ontex. All confidential materials must be returned upon departure. Disclosures to legal authorities regarding potential violations remain permitted under applicable laws.

If in doubt, contact the [legal or information security teams](#) for guidance.

## 24. Privacy

We respect the privacy of all individuals and maintain the confidentiality of the personal data we manage. We strive to adhere to all applicable data protection laws, including the General Data Protection Regulation (GDPR) and other relevant regulations governing the collection, use, and disclosure of **personal data**.

### Everyone is expected to:

- > Protect the personal data they access related to employees, representatives, customers, suppliers, business partners, consumers, or any other individuals.
- > Safeguard personal data against unauthorized access, loss, or misuse.
- > Respect the legal rights of individuals, including their right to access, correct, delete, transfer, or restrict the use of their personal data.
- > Share personal data strictly on a need-to-know basis with authorized colleagues only.
- > Collect, use, store, or process personal data only when:
  - There is a valid legal basis.
  - Individuals are clearly informed about how their data is collected and used.
  - Explicit consent is obtained where required.
  - The data collected is relevant, adequate, and limited to the stated purpose.
  - Data accuracy is maintained, and data is retained only for as long as necessary for business needs or legal requirements.

**Personal data** refers to any information relating to an identified or identifiable natural person, including (but not limited to) names, identification numbers, location data, online identifiers, or factors specific to a person's physical, physiological, genetic, mental, economic, cultural, or social identity.

For any questions or guidance related to **personal data and privacy** at Ontex, please reach out to [the information and security team](#).

## 25. Communications and cyber-protection

We safeguard business continuity and minimize the risk of disruption by preventing and reducing the impact of incidents across all communication channels—whether written, printed, spoken, or transmitted through computers, applications, mobile devices, or other platforms.

Follow Cybersecurity policies and trainings which include the following expected behaviors:

- > Keep devices and data secure; never leave laptops unattended or download and install unauthorized software on company devices.
- > Report any suspected data breach, lost or stolen devices, or any unauthorized access immediately.
- > Use only approved and secure channels for sharing Company information (e.g., official email, encrypted platforms); never personal accounts or public apps.

- > Verify the source before responding to or sharing information (e.g., double-check email addresses, phone numbers, or links to avoid phishing or impersonation).
- > Limit sensitive discussions to private, controlled settings — avoid talking about Company matters in public spaces, on unsecured networks, or with unauthorized individuals.
- > Stay vigilant and report any potential threats immediately.

For any questions or guidance related to personal data and privacy at Ontex, please reach out to the [information security team](#).

## 26. Responsible use of Artificial Intelligence (AI)

As Ontex adopts innovative technologies, including Artificial Intelligence (AI), we are committed to using these tools ethically, responsibly, and in compliance with applicable laws and regulations. Make sure you understand and follow information security policies on the approved use of AI.

Among others, employees are expected to:

- > Never enter or share confidential or personal data with public AI tools.
- > Ensure all AI use complies with local laws, data-protection requirements, and Company policies.
- > Use AI only as a support tool—final judgment and accountability always rest with us, not the technology.

If in doubt, contact the [legal - intellectual property](#) or the [information security](#) teams for guidance.

## SPEAK UP!

### Report your concerns!

If you are aware of a **violation or potential violation** of our Values, our Code of Ethics, our policies or the law, we count on you to **speak up** immediately and report it so it can be addressed. Raising a concern gives us the chance to address it. Every report is taken seriously and handled with care.

### What concerns can you raise?

We encourage everyone to raise concerns about any **suspected unethical behavior or other misconduct**. If you believe, in good faith, and based on trustworthy sources or data, that something may go against our Code of Ethics, our policies or any legal or regulatory framework, we want to hear from you.

### How can you raise a concern?

We provide **several internal channels** for raising concerns. You can reach out to:

- > Your Line Manager,
- > Your Local Person of Trust (where appointed),
- > Group Compliance,
- > Internal Audit,

Or you can use our external **Speak-up line** (online or by phone).

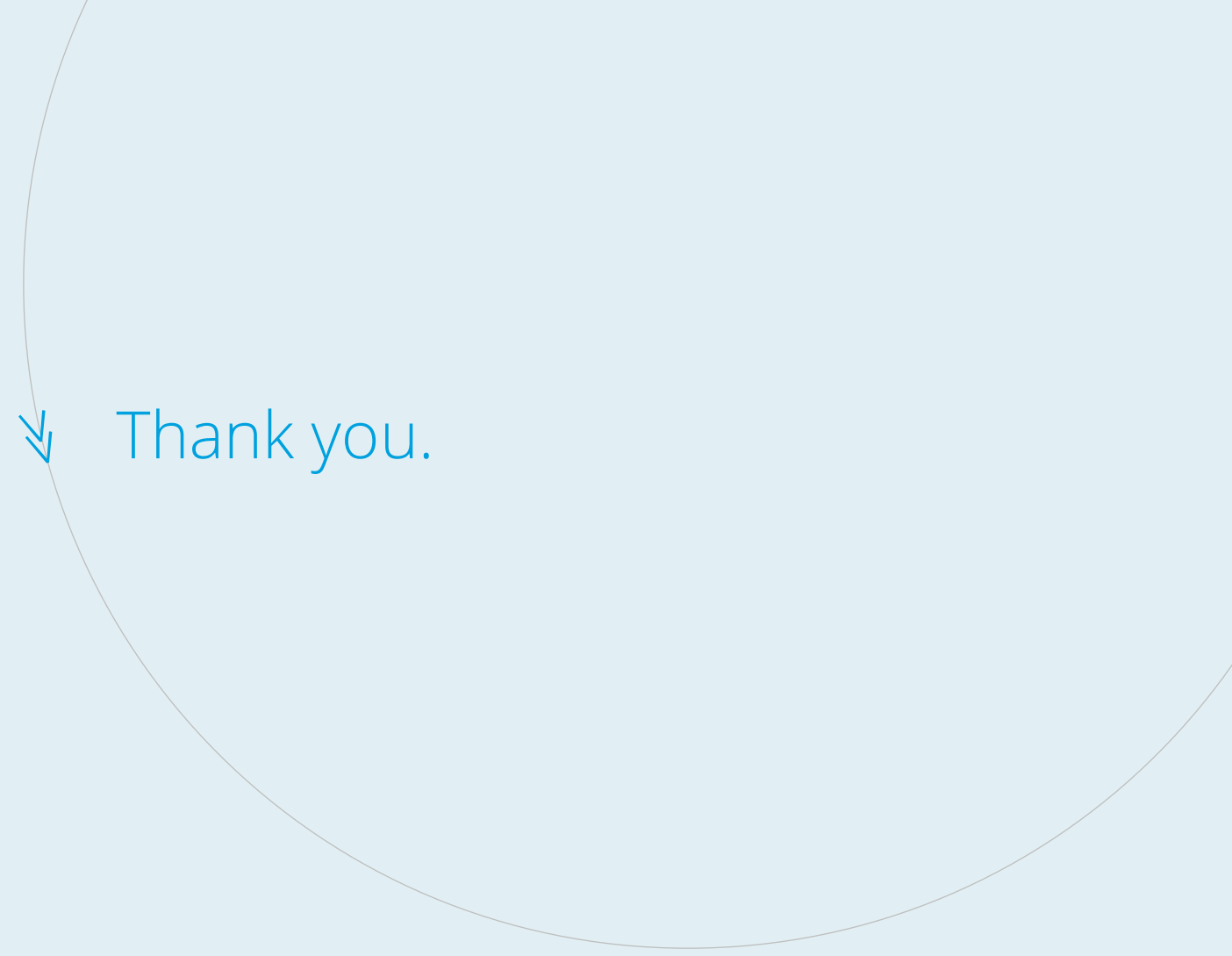
### Can you report anonymously?

Yes, you can share your concerns anonymously. That said, we encourage you to share your identity when you feel safe doing so. It helps us to investigate reports more effectively and resolve the issue faster.

### Non-retaliation and malicious allegations

At Ontex, you are protected when you speak up in good faith. We do not tolerate any form of retaliation against employees who report concerns in **good faith** or who participate in all honesty in an investigation.

We do expect all information shared to be truthful and complete to the best of your knowledge. Making false or malicious reports is taken seriously and may lead to disciplinary action.



⇓ Thank you.