

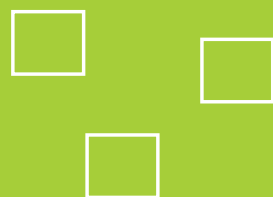


ETHICAL CHARTER OF PARTNERSHIPS



PLANT EXTRACT
& ESSENTIAL OIL
BASED PRODUCTS

*Vegetal power
& animal well-being*



SUMMARY

COMPLIANCE
WITH **LEGISLATION** p.4

RESPECT
FOR **PEOPLE** p.4

FIGHT AGAINST
CORRUPTION AND
INFLUENCE PEDDLING p.4

CONFIDENTIALITY
AND DATA **PROTECTION** p.5

CONFLICT
OF **INTEREST** p.5

p.5 FIGHT
AGAINST **FRAUD**

p.6 RELATIONSHIP WITH
CUSTOMERS, SUPPLIERS
AND OTHER **BUSINESS**
PARTNERS

p.6 COMMITMENT TO
QUALITY AND
EXCLUSION OF
COUNTERFEITING

p.7 SECURITY OF
DATA **ACCOUNTING**
INFORMATION

p.7 RESPONSABILITY



INTRODUCTION

The Ethics Charter defines the principles and values that must guide each PHYTOSYNTHESE employee in the daily practice of their profession.

Integrity, loyalty, respect of the person, transparency, the fight against corruption and unfair competition are fundamental values of the Lehning Group in the conduct of its business.

This Ethics charter applies to all PHYTOSYNTHESE Employees, hereinafter referred to as "Employees", as well as to all persons with whom PHYTOSYNTHESE is associated, such as its clients, suppliers, advisors, consultants, subcontractors and other intermediaries.

Each Employee must apply, within the limits of their duties and responsibilities, the rules set out below, which are part of the loyal and good faith execution of their employment contract, and ensure that they are also applied within their team or by the persons under their responsibility.

Employees who fail to comply with applicable laws or regulations, or with the principles of this Charter, may be subject to disciplinary action in accordance with internal regulations and/or legal provisions.



COMPLIANCE WITH LEGISLATION

PHYTOSYNTHÈSE is committed to respecting the laws and regulations in every country where it operates. Compliance with the law is an essential value. It is the responsibility of all Employees to know and fully comply with applicable laws and regulations, as well as the various policies and guidelines established by the Company in its various areas of activity.

RESPECT FOR PEOPLE

PHYTOSYNTHÈSE intends to apply a fair Human Resources policy that complies with the law. In particular, it refrains from any discrimination, pressure, prosecution or harassment of a moral or sexual nature.

Each employee has the right to privacy, in particular through the regulations governing computer data.

Ensuring and reinforcing the security of employees in the performance of their activities is a permanent concern.

FIGHT AGAINST CORRUPTION AND INFLUENCE PEDDLING

PHYTOSYNTHÈSE promotes integrity and ethics in all aspects of its activities and is committed to complying with the provisions of Law No. 2016-1691 of December 9, 2016 (Sapin 2), on transparency, the fight against corruption and the modernization of economic life.

PHYTOSYNTHÈSE treats all its Suppliers and/or Partners honestly, fairly and without favoritism, regardless of their size and condition. Employees conduct all purchases in accordance with the principle of fair and open competition, and calls for tender are conducted with transparency.

PHYTOSYNTHÈSE rejects all unfair competitive and commercial practices, in particular any agreement with competitors, or any concerted practice concerning financial conditions, the distribution of services, markets or clients.

PHYTOSYNTHÈSE asks its Suppliers and/or Partners to comply with applicable laws and regulations concerning corruption in all its forms, and to take measures to prevent the occurrence of such risks.

The supplier and/or partner is committed to the values of honesty and integrity. It does not tolerate any form of corruption, bribery, extortion or embezzlement. Suppliers and/or Partners shall conduct their business in accordance with applicable regulations regarding competition and the prohibition of bribery in business transactions.

Thus, **PHYTOSYNTHÈSE** Suppliers and/or Partners must not offer or propose, directly or indirectly, to a **PHYTOSYNTHÈSE** employee, or to one of his or her relatives, gifts, invitations or any other advantage likely to influence or hinder the integrity, independence of judgment or objectivity of the said employee in his or her relations with suppliers. Only gifts of symbolic value and within the realm of civility may be accepted by **PHYTOSYNTHÈSE** employees.

CONFIDENTIALITY AND DATA PROTECTION

PHYTOSYNTHESE is committed to respecting the French law n° 78-17 of January 6, 1978 relating to information technology, files and freedoms, the General Data Protection Regulation (RGPD) and other regulations relating to data confidentiality. The Group therefore ensures that data relating to its employees, customers, suppliers and all other stakeholders is handled appropriately and protected from disclosure.

All confidential information must be kept and remain confidential unless it has been the subject of authorized public dissemination, as its unauthorized disclosure could be detrimental to the company.

Each Employee shall:

- limit the disclosure of confidential information to those who have a legitimate need to know;

- keep securely, in any format (paper or electronic), all confidential information relating to the Company's activities and to the companies with which it has business relations;
- prevent disclosure of confidential information to persons outside the Company (including their family members).

PHYTOSYNTHESE's suppliers and/or Partners undertake to implement all measures necessary to ensure the confidentiality and protection of the data entrusted to it for the performance of its mission. In cases where the sharing of confidential data with third parties is necessary, the employees of Suppliers and/or Partners, must ensure that the parties concerned have signed a confidentiality agreement prior to sharing any information.

CONFLICT OF INTEREST

Any activity or mission of **PHYTOSYNTHESE** Employees that runs counter to the Company's interests is prohibited by the Company.

Any situation where **PHYTOSYNTHESE** Employees' personal interests could conflict with its own must be avoided. Suppliers undertake to disclose to **PHYTOSYNTHESE**, without delay, any situation of actual or potential conflict of interest.

FIGHT AGAINST FRAUD

Fraud and any other dishonest, illegal or reprehensible behavior or actions are strictly prohibited. Severe administrative, civil and criminal penalties may be imposed on any individual or entity involved in fraudulent activities. Managers have the primary responsibility to prevent and detect fraud.

Under no circumstances will a Supplier act fraudulently, mislead others, or make false statements for the purpose of deliberately obtaining any advantage, nor will the Supplier authorize anyone to do so.

RELATIONSHIP WITH CUSTOMERS, SUPPLIERS AND OTHER BUSINESS PARTNERS

PHYTOSYNTHÈSE maintains honest and fair relations with all its stakeholders, and in particular with its customers, suppliers and other business partners.

Consequently, the company is committed to honoring its contractual commitments and respecting its commercial agreements.

Employees must ensure that they act with professionalism, integrity and fairness in order to encourage customers to use the company's services.

Sales activities, in France and abroad, are carried out in compliance with local regulations, which all employees must be familiar with. In particular, **PHYTOSYNTHÈSE** respects the specific rules governing private and public markets, regardless of the country in which it operates.

It is the responsibility of each Employee to select its Suppliers and Partners on an objective basis, without favoritism or discrimination, based on criteria of quality, performance, cost and suitability to its needs.

PHYTOSYNTHÈSE expects from its partners an equivalent commitment in terms of respect for human rights, including the prohibition of child labor, fair sales and marketing practices, protection of confidential information and intellectual property, the fight against corruption and more broadly, business ethics. The Supplier is committed to dealing honestly and fairly with all of its customers, regardless of the size of their business, and to honoring its contractual commitments. It may be necessary to use external business partners (business introducers, subcontractors) in the course of providing services. Any Employee using a business partner must ensure that appropriate checks are implemented and that the business partner has committed to comply with the requirements of this Charter, before entering into a business relationship with them.

COMMITMENT TO QUALITY AND EXCLUSION OF COUNTERFEITING

The products supplied by **PHYTOSYNTHÈSE** comply with the regulations and standards established in terms of quality, health, safety and the environment on its own sites and those of its customers.

The Supplier and/or Partner delivers products and services that meet the requirements of its customers in terms of quality, costs and deadlines and seeks to continuously improve.

The Supplier and/or Partner defines, implements and manages methods and processes appropriate to the products, to avoid using counterfeit parts, or materials, in its finished products.

SECURITY OF DATA ACCOUNTING INFORMATION

PHYTOSYNTHÈSE is committed to providing accurate, transparent and regular information, in particular to financial partners.

All employees participate in the production of regular and accurate accounts giving a true and fair view of the financial situation, the results of operations, transactions, assets and liabilities of Lehnig Laboratories, thanks to the correct transmission of operations, contractual documents and disputes in progress of which they have knowledge.

The preparation of these documents shall be in accordance with accounting principles with entries supported by appropriate documents issued by bona fide parties.

All documents are kept in accordance with applicable laws and Lehnig Group policies.

Any transfer of funds requires special vigilance, particularly with regard to the identity of the recipient and the reason for the transfer.

RESPONSABILITY

PHYTOSYNTHÈSE's Supplier and/or Partner undertakes to provide all supporting documents that may be legitimately requested, or that the law requires, and to take out the necessary insurance policies in the context of its mission and to justify them.

Any serious and deliberate breach by the Supplier and/or Partner of the principles set forth in this Charter shall constitute a breach of its contractual obligations, which may lead, depending on the seriousness of the breach, to the application of the coercive measures provided for in the contract, which may go as far as the outright termination of the contract to the detriment of the Supplier, without prejudice to any damages and interest. In the event that a supplier, due to particular circumstances, is unable to comply with certain provisions of this Charter, it will be required to inform **PHYTOSYNTHÈSE** in order to agree on corrective measures to be implemented.

PHYTOSYNTHÈSE reserves the right to ensure that all its suppliers comply with this Ethical Charter. Such verification may be carried out either by an audit conducted by **PHYTOSYNTHÈSE** or by an external source designated by the LEHNIG Group.

The Supplier and/or Partner must also ensure that all of its own suppliers, subcontractors and partners respect the principles detailed above. Indeed, all the actors of the value chain must be involved, with regard to the duty of vigilance for aspects relating to human rights, fundamental freedoms, health and safety and the environment.

If the Supplier and/or Partner notices unethical behaviour or a breach of the rules mentioned in this charter, he must report it without delay using the **dedicated e-mail address** (alerte-ethique@lehning.fr). Any report will be treated confidentially and the LEHNIG Group will take the appropriate measures.



FIND ALL OUR
SOLUTIONS AT

WWW.PHYTOSYNTHESE.COM



S.A.S.U. with a share capital of 150 000 €
57, avenue Jean Jaurès - MOZAC, 63200 - FRANCE
SIREN 410264113 - RCS Clermont Ferrand
APE 1091Z - TVA/VAT FR 91410264113

Phone +33(0)4 73 33 15 00 - Fax +33(0)4 73 33 45 10
email@phytosynthese.com - www.phytosynthese.com

