



# Lyreco

A GREAT WORKING DAY.  
DELIVERED.

**Code of Ethics**  
July 2024



# Contents

- 03 Our commitments
- 04 Purpose of the Code of Ethics
- 06 Your alert tool: Raise your concern
- 07 Compliance with laws, regulations and standards

## 08 Our people

- 09 Leadership
- 10 Health, safety and well-being
- 11 Inclusion and diversity
- 12 Intimidation and harassment
- 13 Listening to our colleagues

## 14 Our business integrity

- 15 Corruption and influence peddling
- 16 Fraud
- 17 Conflict of interest
- 18 Fair competition
- 19 Facilitation payment
- 20 Gifts and invitations
- 21 Customer and supplier relationships

## 22 Our products and assets

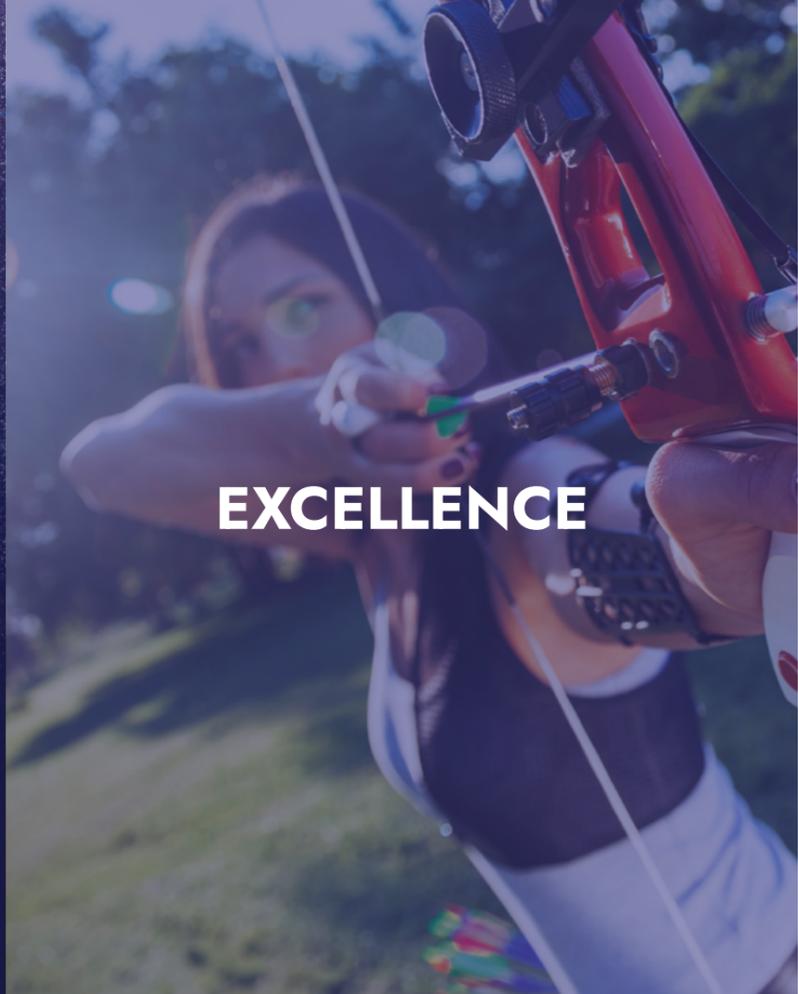
- 23 Product excellence
- 24 Protection of assets
- 25 Communication

## 26 Our societal engagement

- 27 Environment
- 28 Human rights
- 29 Political activities and lobbying
- 30 Citizenship and societal engagement



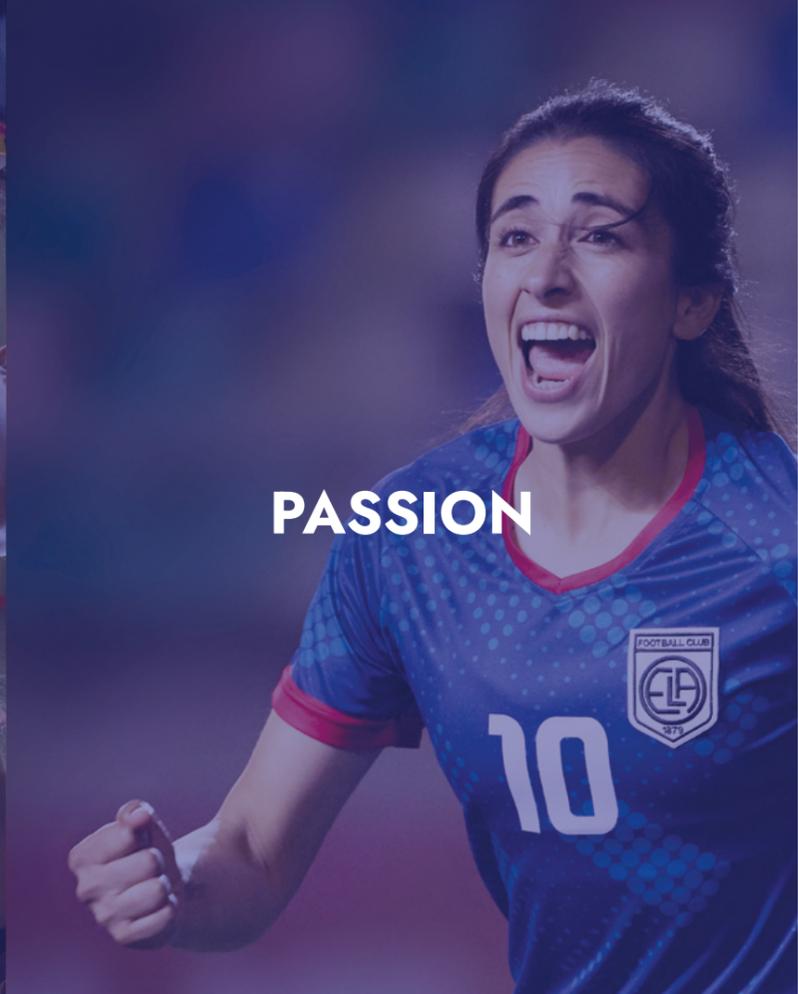
**AGILITY**



**EXCELLENCE**



**RESPECT**



**PASSION**

## **Our commitments**

Since it was established in 1926, Lyreco has been driven by its values of Excellence, Respect, Passion and Agility. We are proud of them. They are shared and promoted by all employees, form our key strength, and make us a trusted partner. For us, respecting these values is a matter of course, an obligation and a duty.

This new version of our Code of Ethics reaffirms our commitments. It once more highlights the attitude we must adopt in our working environment, our business activities and the relationships between our colleagues, customers and business partners. This Code removes any doubt that may still linger when an unusual situation presents itself and renews our commitment to combat any breach of our ethical principles.

I urge you therefore to read it carefully and ensure that you abide by it, so that every day is always "A Great Working Day" for everyone.

Grégory Liénard - Group CEO

## Purpose of the Code of Ethics

**The Code of Ethics is intended to point out the principles of integrity, neutrality, fair-play, equity and compliance expected by Lyreco.**

**This Code of Ethics has been translated into many languages used by Lyreco entities. In the case of any doubt or difference in interpretation, the English version shall prevail.**

### To whom does the Code of Ethics apply?

The Code of Ethics applies to all employees in all Lyreco entities worldwide.

We also expect the same compliance and integrity requirements from our external business partners.

To this end, a Code of Ethics for our suppliers is available on Lyreco's corporate website.

### What happens in case of non-compliance with the Code of Ethics?

Each employee may, in the course of their professional duties, take a decision which entails Lyreco's liability and compromises its reputation.

We are all expected to be familiar with the Code of Ethics and to act in accordance with its principles. Dedicated training sessions are provided in order to intensify understanding.

Failure to comply with the Code of Ethics may result in very serious consequences, both for the company and the persons involved. Depending on the nature of the employee's breach, disciplinary sanctions may be applied, in accordance with local legislation and Lyreco's internal policy. Under no circumstances shall ignorance of the Code of Ethics be considered as an excuse.

For a full understanding of the rules of conduct, each topic covered by this Code of Ethics contains:

- The key principles
- The behaviours to be adopted and those to be avoided
- A few examples in the form of questions-answers
- The reference documentation
- The reference contacts



**This is a living guidance whose purpose is to continuously evolve so as to better adjust to our business activities. Consequently, the latest updated version of the Code of Ethics and reference documents will apply.**

# Purpose of the Code of Ethics

It is designed to guide our conduct and our individual and collective decisions in accordance with these principles:



With all our employees and business partners



In all our business activities



Wherever we operate



At any time

## What if

**A situation is not covered by the Code of Ethics.**

It is impossible to foresee all situations we may face. We encourage you to use good judgment and, in case of doubt, to ask for guidance before acting.

**Local laws or regulations are more or less restrictive than the Code of Ethics.**

In all cases, the strictest and most repressive requirements shall take precedence.

## Where to find it

- An interactive version of the Code of Ethics is available for consultation and download via the Toolbox (library) and Lyreco's corporate website.
- All reference documentation is accessible in the Toolbox - QSS library.



### Reference document

- P MNG 089 - Disciplinary sanctions



# Your alert tool: Raise your concern

Our common purpose is to prevent and detect any breach of an ethical nature so that Lyreco may take the appropriate measures and remedy the situation.

We encourage you to discuss, ask for advice, raise questions, share your concerns and indicate any actual or potential breach of the Code of Ethics.

## ASK QUESTIONS AND VOICE YOUR CONCERNS HELP LYRECO PROTECT ITS CULTURE OF INTEGRITY

### Identify



Is this incompatible with our values?



Is it a breach of the Code of Ethics?



Does it appear to be unethical?



Could it harm Lyreco's reputation?

### Speak up!

#### Contact:

Your Manager

#### Your Ethics referent

- At local level:  
Your Finance or P&C Manager/Director
- At Group level:  
Your Ethics Compliance Manager

### Confidentiality and absence of retaliation

It takes courage to ask questions or voice your concerns. Rest assured that Lyreco will treat any questions or alerts with confidentiality and without any risk of reprisal.

In compliance with national and international whistleblowing protection rules, Lyreco does not tolerate any form of reprisal or retaliation against any person who reports honestly and in good faith.

On the other hand, any person who misuses the alert system or reports facts in bad faith, with the intention of causing harm or knowing that they are false, will be subject to disciplinary sanctions (see procedure P MNG 089 - Disciplinary sanctions) as well as to legal proceedings.

Only when your Management and P&C Team cannot deal with the issue, use the "Raise your concern" tool accessible via the Toolbox and Lyreco's corporate website.



#### Reference documents

- P MNG 0 85 - Alert process and alert management
- P MNG 0 89 - Disciplinary sanctions

# Compliance with laws, regulations and standards

## Our principles

### Individual responsibility

Employees must, under any circumstances, comply with any applicable regulations, including the company's policies and internal rules. Lyreco shall not tolerate any contrary practice. Ignorance shall never be considered as an excuse.

### Collective risk

In case of breach, the concerned employee and the company are exposed to sanctions.

### ✓ MUST

- Remain informed on a regular basis of applicable regulations concerning your duties or your field of activity.
- Seek advice before acting in case of doubt regarding the applicable regulations.
- Report any contravening conduct committed by an employee or business partner.

### ✗ MUST NOT

- Become complicit in any illegal or non-compliant act.
- Conceal or ignore any illegal or non-compliant act.
- Take a decision whilst ignoring the applicable regulations.

## What if

**A customer has asked me to accept a contractual clause which I find contrary to our standards. What should I do?**

Before any acceptance, you are obliged to contact one of the reference contacts who will take the necessary steps to check the legal validity of such a clause.

**I think that an action does not comply with the applicable laws and regulations. How should I respond?**

You should firstly verify and clarify the facts, circumstances and reasons for such an action. If you conclude that there is risk of a breach, you should immediately inform one of the reference contacts.

**Some local laws and regulations required in the country where I work are different to some of the requirements referred to in this Code of Ethics. Which should I apply?**

In the event of a conflict between your local regulations and this Code of Ethics, you should always apply the strictest requirement. In case of doubt, ask advice from one of the reference contacts.



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool





**Lyreco**



**OUR  
PEOPLE**

# Leadership

## Our principles

### Develop a collective spirit

Motivating and helping colleagues grow in the pursuit of collective objectives is a core mission of managers.

### Promote an ethical culture

The mission of all our managers is to create and uphold a culture of integrity and ethics within their team.

### ✓ MUST

- Ensure the sharing and implementation of the Code of Ethics.
- Develop a trusting environment enabling each employee to ask questions or voice their concerns.
- Manage any integrity or ethical issue raised.

### ✗ MUST NOT

- Ignore a concern raised by an employee.
- Avoid or refuse to support an employee seeking advice or help.
- Put an individual's interest first.

## What if

### I am a manager and a member of my team has reported an ethical problem. What should I do?

Above all, it is imperative to respect total confidentiality regarding the alert raised and the identity of the whistleblower. Gather all the facts from the employee and share this concern with one of the reference contacts.

### I have difficulty in taking a decision following a concern of an ethical nature raised by one of my team members. How should I respond?

If you find a situation which raises either potential or actual ethical issues, don't make a decision alone or in a hurry. Gather the facts and report any issue to one of your reference contacts.

### I don't know whether the culture of integrity is correctly applied by my team members. How can I be sure?

We encourage you to identify and regularly monitor potential risks of violating the Code of Ethics within your team. Encouraging discussions ensures that the Code of Ethics is known and understood through its promotion and assessments. Individual training must be undertaken by all employees.



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Health, safety and well-being

## Our principles

### Healthy and secure environment

Preventing and fighting against work-related accidents and occupational illnesses are essential commitments for Lyreco.

### Well-being at work

Lyreco aims to promote quality of life in the workplace, ensuring a balance between professional and private life whilst encouraging a positive and supportive attitude between colleagues.

### ✓ MUST

- Comply with the health and safety rules every day.
- Know what to do in case of emergency in your workplace and quickly comply with all the evacuation instructions.
- Protect yourself and others.
- Quickly report any situation, even minor, that may potentially damage health and safety at work.

### ✗ MUST NOT

- Put yourself or other employees in danger.
- Remain passive and silent when facing any critical situation to the health and safety of your colleagues or yourself.
- Maintain a negative or damaging atmosphere to the collective well-being.

## What if

**I have to wear personal protective equipment to perform my work. Can I be sure of working in complete safety?**

Lyreco, as an employer, determines whether wearing personal protective equipment is fit for a particular purpose by considering the work environment and associated risks. Comply with all of Lyreco's policies required to this end. Before using, you are required to read any labels, warnings, information and instructions provided with the personal protective equipment made available to you. In case of doubt, seek advice from reference contacts.

**I am faced with certain difficulties at work and consider that my working environment has a negative impact on my well-being. What should I do?**

We encourage you to quickly discuss with one of the reference contacts in order to implement the appropriate corrective measures. The longer you wait, the more this uncomfortable situation will have a negative impact on your own feeling of well-being, your professional performances and your personal balance.

**I am a logistics operator in a Lyreco warehouse. I have noticed that a piece of equipment is not working properly. What should I do?**

Firstly, stop using this equipment immediately. In order to avoid any potential risk for the health and safety of others, share this information around you and report this situation immediately to the manager. If the situation remains, report it to your Ethics referent so that the appropriate corrective measures may be implemented as soon as possible.



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Inclusion and diversity

## Our principles

### Respect as a core value

Social inclusion and diversity contribute to the wealth of our corporate culture.

### No discrimination

Decisions by Lyreco regarding recruitment, training and promotion are exclusively based on qualifications, skills and professional experience.

## What is it?

Discrimination refers to all unequal treatment based on gender, age, disability, nationality, colour, social class, family situation, sexual orientation, religious beliefs, culture, political opinions or any other characteristic.

### ✓ MUST

- Act towards others, internally and externally, with openness and respect for cultural differences.
- Object to any inappropriate behaviour.

### ✗ MUST NOT

- Hold opinions or behave in a discriminatory or non-respectful manner with respect to differences.
- Favour certain employees.

## What if

**My female colleague is very committed and performs very well. But, during the course of last year, several male colleagues were promoted or received a pay raise despite weaker performances. I suspect that she is a victim of discrimination because she is a woman. How should I respond?**

If you suspect discriminatory practices within your team, you are invited to report them to one of the reference contacts.

**One of my colleagues often tells offensive racist and homophobic jokes. Some of my colleagues feel offended and ill at ease, but no-one dares tell him to stop. What should I do?**

If you witness discrimination, have courage and object to any inappropriate behaviour. You may also report these behaviours to one of the reference contacts.



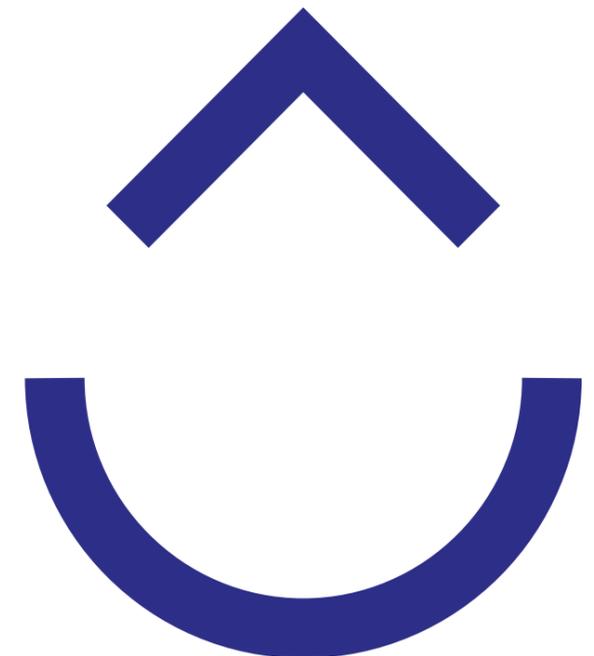
### Reference document

- P MNG 0 88 - Discrimination and harassment



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool



# Intimidation and harassment

## Our principles

### No intimidation or harassment

Lyreco is focused on providing a working environment free from any form of intimidation or harassment.

### Dignity and professionalism

Any employee or business partner must be treated with dignity and professionalism.

## What is it?

Intimidation and harassment refer to any unwelcome and repeated actions towards another person, whether verbal, visual or physical, creating an intimidating, hostile, offensive or threatening working environment.

### ✓ MUST

- Listen carefully to any person voicing a concern or problem regarding intimidation or harassment.
- Object to any inappropriate behaviour.

### ✗ MUST NOT

- Engage in any form of harassment using words, gestures, remarks or inappropriate physical contact.
- Display offensive images or objects.
- Have an inappropriate behaviour during events/conventions.

## What if

**My manager regularly sends me sexually explicit messages. I feel very ill at ease. How should I respond?**

We do not tolerate this kind of behaviour, whether during or outside work hours, irrespective of the context and situation. We encourage you to explicitly request your manager to stop. In order to ensure rapid and effective action, you may also inform one of the reference contacts to obtain help and decide upon the action to be taken.

**My manager can be very intimidating. I know that this is to incite us to produce quality work, but sometimes he can be very humiliating which damages the morale of the whole team. What should I do?**

Your manager's role is to stimulate and motivate his team to produce quality work. Therefore, he is justified in assessing his team members' performance or making remarks to this end. However, a manager must also treat his team with respect and act in an appropriate manner. If you think you were not treated professionally, you must try to speak about it with your manager.

**During an event organised by Lyreco, one visibly drunk colleague behaves in a particularly inappropriate manner towards yourself. How should I react?**

Although alcohol consumption is permitted during this type of event, we do not tolerate any inappropriate behaviour - verbal or physical - that could be the consequence of excessive alcohol consumption. We encourage you to explicitly request your colleague to stop. You may also inform one of the reference contacts to obtain help and decide upon the action to be taken.



### Reference document

- P MNG 0 88 - Discrimination and harassment



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Listening to our colleagues

## Our principles

### Encourage dialogue

Allowing employees to express their opinions and guaranteeing constructive social dialogue is essential for Lyreco.

### Represent colleagues

All employees have the right to organise, belong to and play an active part in trade unions or employee representative bodies.

### ✓ MUST

- Openly share your concerns.
- Know who the representatives and representative bodies of employees are.

### ✗ MUST NOT

- Treat trade union members or employee representative bodies differently from other employees.
- Influence employees' free choice to form or belong to a trade union.

## What if

**I envisage a change which could have an impact on the team organisation of my team's working hours. Should I involve the employee representative bodies?**

Firstly, seek advice from one of the reference contacts. According to the current local laws and regulations, it may be mandatory in specific situations (e.g., possible restriction of employee rights) to involve the trade unions or employee representative bodies.

**One of my team members wishes to be elected as a trade union member. What should I do?**

Lyreco respects the right of its employees to belong to a trade union. As a manager, you must not intervene in this process. If your employee is elected, you must ensure that this employee is able to fulfill his or her trade union obligations and assess the impact on your team's workload.

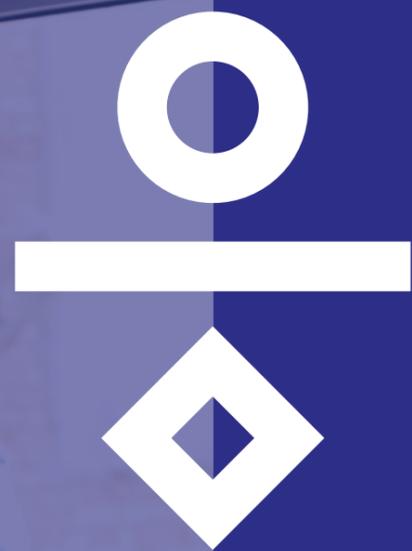


### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool



Lyreco



OUR  
BUSINESS  
**INTEGRITY**

# Corruption and influence peddling

## Our principles

### A strict prohibition

Any form of corruption or influence peddling, either direct or indirect, active or passive, public or private, is strictly forbidden.

### Zero tolerance

As the company and the employees involved incur liability, any contravening conduct, including any intention or attempt of corruption or influence peddling, shall be subject to sanctions by Lyreco with zero tolerance.

## What is it?

Corruption is the fact of promising, giving, soliciting or receiving, directly or indirectly, money or anything of value for the purpose of obtaining an unjustified advantage or influencing a decision. It does not always involve a material act.

Influence peddling refers to the fact that a person is remunerated for influencing a decision to be taken by a third party.

Corruption or influence peddling may be active or passive.

### ✓ MUST

- Refuse any form of corruption or influence peddling committed by an employee or business partner.
- Follow the training dedicated to fighting against corruption and influence peddling organised by Lyreco.

### ✗ MUST NOT

- Become complicit in any act of corruption or influence peddling.
- Conceal or ignore any situation involving corruption or influence peddling.

## What if

**I am working on a building permit application for the extension of our distribution centre. I know that such a request is complicated as many authorisations are necessary and the result is uncertain. I have been contacted by a consultant who is offering to help me, arguing that he is very familiar with the public official who will take the decision. Should I accept his proposal?**

You must be very careful and check the consultant's reputation and references. It may definitely be wise to call on external assistance for a complicated case. However, you must be certain that we only pay fees for his technical expertise and that his service does not constitute, directly or indirectly, a form of corruption or influence peddling. In such a situation, the fact that the consultant has invoked his personal relationship with the decision-maker is an indication that you must be vigilant.

**Whilst working on the reply to a tender organised by a potential customer, the purchaser of this customer company is demanding a kickback payment for selecting Lyreco as supplier, or asking me for a favourable price agreement in return for a luxury weekend. May I accept in order to win the contract?**

This is a case of pure corruption! You should never, directly or indirectly, nor at any time, accept or receive any kind of kickback, bribe or other compensation, regardless of the amount and source, whether from the private or public sector, whatever the context and particularly as part of a call for tenders. In such a situation, you are required to refuse and immediately report it to one of the reference contacts.

**One of our suppliers informs me that he can send extra samples of products to my**

**personal address as he has too many of them. May I accept his offer?**

You should explicitly refuse to receive samples at your personal address. This might be considered as an attempt to inappropriately influence your decision. As a reminder, the quantity of samples sent by our suppliers must be limited to the strict minimum. Samples must not, under any circumstances, be used for private purposes or sold to your profit. You could maybe suggest to the supplier that, in the event of surplus samples, he sends them for your attention to Lyreco for the purposes of "Lyreco for Education".

**One of my colleagues told me that he had received a gift voucher for a luxury weekend of his choice from a supplier. Is this normal?**

First of all, you should inform your colleague that this violates the Code of Ethics and, more specifically, the "Gifts and invitations" procedure, and that he should not only explicitly refuse the voucher and return it to the supplier but also report the case to one of the reference contacts. This might be considered as an attempt to inappropriately influence his decision.



### Reference document

- P MNG 0 81 - Corruption
- P MNG 0 82 - Conflict of interest
- P MNG 0 83 - Facilitation payment
- P MNG 0 86 - Gifts and invitations



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Fraud

## Our principles

### Maintain constant vigilance

Any employee must prevent, detect and combat all types of fraud, whether internal or external.

### Accuracy of financial data

Each employee has a duty to ensure that any financial information provided is accurate.

## What is it?

Fraud refers to an illegal act characterised by deception, concealment or a breach of trust (e.g., false or misleading financial declarations, misappropriation of funds, theft of company's assets, false declarations to a third party, identity theft and document falsification, false or fraudulent bank transfers, cyber-attacks, money laundering, malpractice, overcharging, etc.).

### ✓ MUST

- React immediately to any unusual request which may conceal a fraudulent approach.
- Comply with Lyreco's internal accounting procedures.
- Make sure that any information and data used are reliable and obtain supporting documentation.

### ✗ MUST NOT

- Distort or manipulate data.
- Disclose any information which may be used for fraudulent purposes.

## What if

**I am an accountant and someone, presenting himself as the president of the company with which I do not have regular professional contact, called me for an urgent and unusual request to transfer funds. What should I be careful of?**

This is a typical sign of fraud. Do not panic or transfer any funds on your own initiative. You are obliged to check the source and immediately report this request to one of the reference contacts and preferably first the Finance director.

**I work in the Finance Department and received an email which apparently emanated from a public authority, requesting connection to a website in order to download certain financial information for statistical purposes. How should I respond?**

If this is an unusual request, you should report it to your manager and check whether this request was really issued by a public authority. It might be a phishing attempt.

**I am a project manager and the external service provider is**

**invoicing, for providing services linked to this project, an amount exceeding the budgeted amount. May I spread the cost over several months to conceal this over-expenditure?**

Absolutely not. Inaccurate reporting of costs is manipulation of the company's accounts and is strictly prohibited.

**My monthly sales are lower than the individual performance objective. I therefore asked a customer to make an order totalling a significant amount of products which he will return next month for a full credit. Is this acceptable?**

This kind of manipulation intended to obtain a monthly bonus is strictly prohibited and may lead to serious penalties for the concerned employee.



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Conflict of interest

## Our principles

### Maintain objectivity

Lyreco does not allow personal interests to conflict with Lyreco's interests.

### Declare any risk

Any risk entailing a conflict of interest must be declared by the employee in question.

## What is it?

A conflict of interest refers to any situation in which an employee has a private or personal interest which is likely to influence the objectivity of an internal or external decision, particularly in the context of a contractual negotiation, a business partner selection or a recruitment.

### ✓ MUST

- Question yourself about any risk of conflict of interest before any action or decision.
- As a manager, manage any situation involving a conflict of interest and take a decision depending on the circumstances.

### ✗ MUST NOT

- Conceal or ignore any situation involving a conflict of interest.
- Enter into a negotiation or decision implicating a friend or a close relation without prior information and approval.

## What if

**I have financially invested in a company which is a supplier participating to a call for tenders organised by Lyreco. What should I do?**

You should immediately inform your manager and refrain from taking part in this supplier selection process. You should also ensure that you do not influence the final decision.

**I am a purchaser. My best friend has been appointed as sales manager within one of our suppliers. I have to initiate the annual commercial supplier negotiation with this friend. May I accept to negotiate with him?**

You should immediately share the situation with your manager. Your manager will carefully and confidentially analyse this situation and decide whether you are allowed or not to carry out this negotiation.

**A friend is asking whether there are employment possibilities within Lyreco. May I inform him of possible jobs?**

Lyreco encourages recommendations proposed by its employees for any candidate fulfilling the required skills. Once the CV is received, you cannot participate, in any form whatsoever, in the recruitment process and must inform your friend of this.



### Reference document

- P MNG 0 82 - Conflict of interest



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Fair competition

## Our principles

### Banish all unfair practice

Any unfair or anti-competitive practices are not tolerated by Lyreco in any way. It is prohibited to restrict, distort or prevent free competition, including by using threat.

### A shared responsibility

Lyreco requires that its business partners and employees perform commercial practices in compliance with the regulations.

### ✓ MUST

- Avoid contacts with a competitor.
- Only share public information concerning a business partner, a market or a competitor.
- Protect confidential or sensitive information of Lyreco or its business partners.

### ✗ MUST NOT

- Exchange or conclude any unlawful agreement with a competitor regarding prices, margins, costs, market allocation, etc.
- Conceal or ignore any unfair or anti-competitive practices committed by a colleague or a business partner.

## What if

**During professional trade fairs, I sometimes discuss general market trends, in an informal way, with some competitors. What should I be careful of?**

Discussions on general market trends are acceptable. But it is strictly prohibited to disclose or gather sensitive information that could affect the commercial interests of Lyreco or its competitors. If you think that the conversation could lead to disclosing sensitive information unintentionally, leave the conversation or change the topic of discussion.

**During a call for tenders organised by a potential customer, a competitor proposed that I inflate his offer so that Lyreco could win it. As a counterpart, the competitor asked me to do the same for the next customer tender process. Is this acceptable?**

Absolutely not. Such a practice contravenes the competition law and could expose Lyreco and yourself to judicial proceedings and severe penalties. You should reject such a proposal and immediately inform one of the reference contacts.

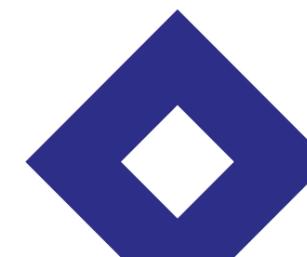
**I have friendly relationships with some people working for one of Lyreco's competitors. What should I do when having informal discussions with them?**

Any discussions with competitors, even informal and occasional, present a risk. Be very careful and avoid any conversation or activity which could lead to disclosing or receiving sensitive information.



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool



# Facilitation payment

## Our principles

### Prohibited

These payments, even small, are acts of corruption and are prohibited.

The only exception concerns threats to the health, safety or freedom of our employees.

## What is it?

Facilitation payments refer to paying a small sum, directly or indirectly, to a public official for administrative formalities in order to facilitate or speed up the granting of services or permits.

### ✓ MUST

- Refuse to make any facilitation payment or allow a third party to do so on your behalf.

### ✗ MUST NOT

- Put yourself in danger by refusing to make a facilitation payment.

## What if

**I am waiting for a business trip visa and the consulate employee tells me that he can accelerate the visa procedure in exchange for €50. If I refuse, I risk receiving my visa too late for my business trip already scheduled. May I accept his offer?**

You should refuse to pay even if you risk being forced to cancel your business trip. You should also report this practice to one of the reference contacts.

**One of my strategic customers is waiting for products that are blocked at the border for customs control. The customs agent tells me that he can accelerate the process by paying €500 to customs control. May I accept so as to keep good business relationships with this customer?**

This facilitation payment is strictly forbidden, even if it is made by a third party. This should also be reported to one of the reference contacts.

**During a trip abroad, I am stopped for border control. Even though I have all the required authorisations**

**and visas, the controller has a different point of view about the situation and threatens to hold me back for breaching immigration laws, unless I pay him €100. Can you accept to do this?**

As your freedom appears to be threatened, you are exceptionally authorised to make a payment. You must also report this incident to one of the reference contacts.



### Reference document

- P MNG 0 83 - Facilitation payment



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Gifts and invitations

## Our principles

### Strict regulations

Any gift or invitation, whether received or offered by an employee, is strictly regulated by Lyreco.

### A practical guide

All employees are invited to read the "Gifts, meals and invitations" guideline to be familiar with the scope of application and the prior validation process.

### ✓ MUST

- Politely refuse any unauthorised gift or invitation.
- Consider the context as well as the internal policy of Lyreco and that of the business partner, before offering a gift or invitation.
- Read the practical guideline in case of any doubt.

### ✗ MUST NOT

- Conceal gifts or invitations received.
- Be held liable for corruption, subject to severe sanctions, by accepting gifts or invitations likely to influence your decision.

## What if

**I would like to invite a potential customer from the public sector to visit our distribution centre in order to demonstrate our technical and logistical expertise. He accepts, provided that Lyreco bears the travel and accommodation expenses. May I accept?**

Any relationship with public officials is sensitive for anti-corruption matters as the regulation may forbid them to accept any gifts or invitations. The costs involved must therefore be reasonable, approved beforehand and strictly associated with the visit. Luxury hotels, expensive meals and trips exceeding the duration of the visit, are strictly forbidden.

**I received a gift from a supplier. As I am familiar with the supplier, I consider that refusing such a gift would be considered as offensive and could hurt our business relationship. May I accept the gift?**

Gifts from suppliers are not acceptable. However, if a refusal may affect the business relationship in question, and solely in this rare case, it may be accepted, subject to exceptional approval from the manager. However, you must donate this gift to "Lyreco for Education".

**My team and I are invited to a whole day's meeting by a supplier to present his new products. This meeting will take place in a luxury hotel, followed by a dinner. The supplier will bear all costs. May I accept?**

In all cases, you must request prior validation in accordance with

Lyreco's internal policy. Approval will depend on the context and factual circumstances, including the time spent at the business meeting during this business trip. It will not be accepted if the invitation is considered as aiming to influence commercial decisions.

**I am organising a call for tenders with our suppliers. One of the applicants has invited me to a professional trade fair which he is attending and has offered to bear all my costs, including those of travel and accommodation. May I accept?**

No, you should refuse as you are responsible for managing the call for tenders. This could be considered as affecting your independence and influencing your decision.

**A supplier has invited me to attend a sport event in a VIP suite with one of my customers in order to promote his products to this customer. Should I accept the invitation?**

No, you cannot accept such an invitation from a supplier, even in the presence of a customer.



### Reference document

- P MNG 0 86 - Gifts and invitations
- MNG 0 86 - "Gifts, meals and invitations" guideline



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Customer and supplier relationships

## Our principles

### Focus on customer excellence

Customer excellence is at the heart of Lyreco's performance.

Our mission: Pioneer in delivering sustainably what any workplaces needs, so its people can focus on what matters most.

### A partnership with our suppliers

Our ability to offer customer excellence is based, above all, on a long-term partnership with our suppliers.

### A guarantee of integrity and trust

Acting with integrity and respect is essential to a sustainable and trusting relationship with our business partners.

## ✓ MUST

- Listen carefully to our business partners.
- Resolve or voice our business partners' concerns.
- Select suppliers on the basis of objective and equitable criteria.
- Refer to applicable contractual conditions in case of claims from our business partners.

## ✗ MUST NOT

- Promise products or services that Lyreco is unable to supply.
- Enter into a business relationship without prior information regarding the business partner in question.
- Disclose any confidential information without prior approval.
- Ignore or minimise any complaint from our business partners.

## What if

**One of my potential customers from the public sector has contacted me to inform me of his intention to delist his existing supplier for office products in order to choose Lyreco. However, he does not wish to launch a public call for tenders and asked me if I was ready to split our commercial offering into several lots so as to remain under the thresholds of public tenders. What should I do?**

Any public procurement procedure, including public tenders, are regulated and subject to conditions defined by law. Any manipulation or attempt to bypass the public procurement procedures could lead to heavy penalties for both Lyreco and the public official in question. Before accepting your customer's proposal, you must report it to one of the reference contacts who will take the necessary steps to check the legal feasibility of such a proposal.

**One of our suppliers is currently out of stock, which could affect our capacity to serve our customers. I have found an alternative supplier who I know professionally, but who**

**is not listed by Lyreco. May I place the order directly with him?**

Any supplier selection must follow the mandatory tender process, even in this case. Moreover, the supplier must be subject to prior assessments. A new supplier may not, therefore, be selected without following Lyreco's internal policy on this matter.

**During a supplier assessment, I noted that a subsidiary of one of our suppliers was suspected of corruption. How should I respond?**

You should immediately inform one of the reference contacts. A decision to continue or not business relationships with this supplier, based on substantiated facts, shall be taken by Lyreco and communicated to the supplier in question. Vigilance is required considering the potential impact on Lyreco's reputation.



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool



Lyreco



# OUR PRODUCTS AND ASSETS

# Product excellence

## Our principles

### A quest for excellence

Lyreco shall ensure that all the products offered to our customers meet the highest standards in terms of quality, safety and environment.

### The key role of our suppliers

Lyreco works exclusively with business partners sharing the same ambitions for product excellence.

### ✓ MUST

- Require the suppliers to provide all the documentation regarding the products.
- Store, transport and deliver the products, considering the nature and instructions from the suppliers.

### ✗ MUST NOT

- Conceal or ignore any issue related to product quality or product conformity.
- Attempt to resolve a quality issue without referring to the relevant persons.

## What if

**A customer is faced with a quality issue concerning a product supplied by Lyreco. I was informed of this problem. May I reply to this customer?**

Any question raised by a customer concerning the quality of our products and services must be handled with the utmost care. Inform immediately one of the reference contacts so that Lyreco can quickly assess the quality issue and the risk level both for the customer and ourselves. You are only allowed to inform your customer that the issue raised has been taken into account. Do not take any initiative or action on your own. Based on quality investigation, corrective measures and dedicated communication (if any) could be implemented by the relevant departments in charge.



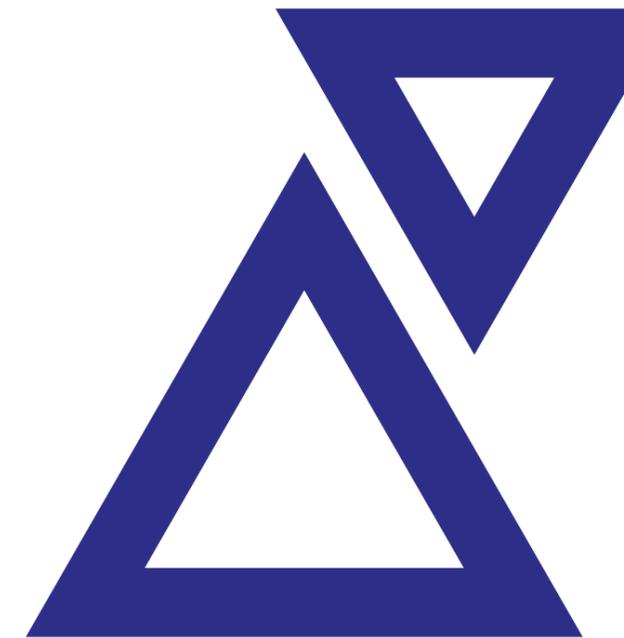
### Reference document

- MNG 010 - Suppliers Code of Ethics



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool



# Protection of assets

## Our principles

### Avoid any inappropriate usage

Except in very specific circumstances where they can also be used for private purposes, each employee must use the company's assets exclusively for professional purposes and protect them against any loss, theft, destruction, illicit use or premature wear.

### Security measures

Lyreco has implemented adequate security measures to guard against cyber-attacks and risks of loss or breach of data.

## What is it?

Assets refers to all Lyreco's tangible and intangible assets (e.g., its facilities, tools, vehicles, office equipment, mobile phones, computers, laptops, financial data, personal data, sensitive information, intellectual property rights, software, etc.).

### ✓ MUST

- Lock your computer when leaving the office and change your password when requested.
- Process the personal data in accordance with the applicable regulations and Lyreco's internal policy.
- Ensure that all external persons invited on Lyreco's premises are registered and accompanied.

### ✗ MUST NOT

- Share your logins and passwords.
- Disclose data to a non-authorised person.
- Leave confidential or sensitive data on a printer or on a shared server.
- Keep or transfer professional documents onto personal devices (telephones or laptops).

## What if

**A colleague does not have access to an IT tool for which I am the administrator. May I send them my login details?**

You must never disclose your login details. Instead, create a new access for your colleague after having received prior approval justifying the access request for this colleague.

**My computer and mobile phone have been stolen. What should I do to ensure that company data is protected?**

Please immediately inform one of the reference contacts so that they may secure data stored on your devices. Also, quickly report the loss or theft to the competent authorities.



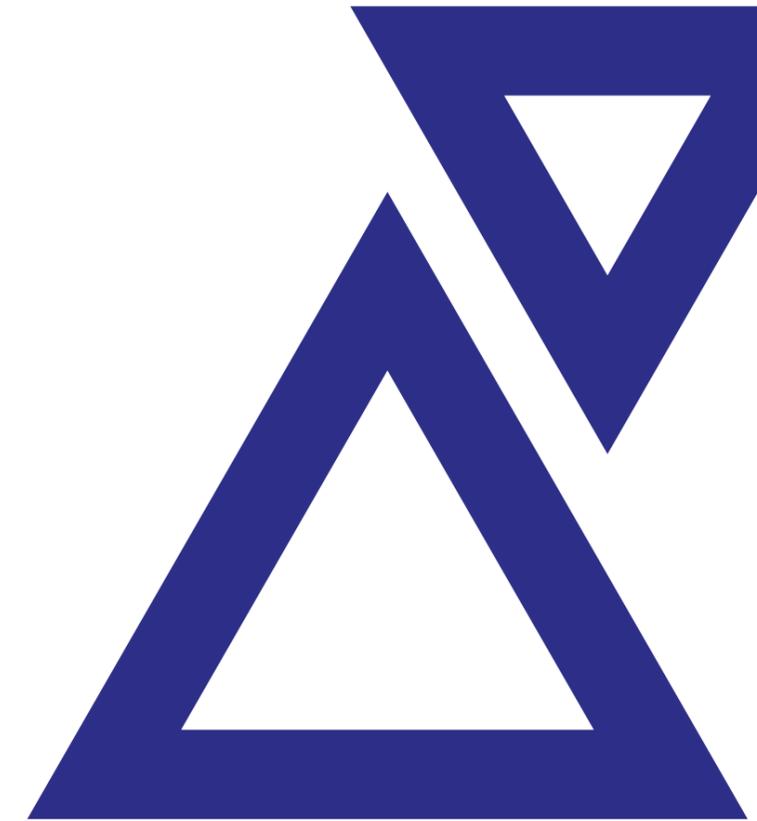
### Reference document

- DPR 002 Data privacy policy



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool



# Communication

## Our principles

### A necessary validation

Any employee brought to voice in the media or during external events, as a representative of Lyreco, must obtain prior approval.

### Vigilance and confidentiality

Irrespective of the channel, especially on social networks, any employee communications must comply with our values and with the reality of our business activity and not contain any confidential information.

### ✓ MUST

- Comply with the communication guides and graphic charts.
- Take any necessary measures to avoid disclosing confidential information.
- Share with the Communication manager any sensitive or negative comment or news article that could harm Lyreco's reputation, particularly those intended for social networks.

### ✗ MUST NOT

- Give an interview or publish information that has not been previously approved by the Communication manager.
- Publicly denigrate the company or its business partners.
- Disseminate false or misleading information or contents.

## What if

**I would like to use my own social media account to promote Lyreco, its solutions and products, but I fear to speak the wrong way or disclose confidential information. What can I do?**

You may ask your Communication manager for advice and ready-to-use contents. You are free to re-post any official content posted by the Communication teams or Managing directors on the company or subsidiary company account.

**A magazine or blog has asked me for an interview. Is this authorised?**

Only accredited spokespersons are authorised to give interviews. If the media or interview is related to your specific expertise, ask for approval from your Managing director and your local communication manager. Please note, before talking to any media, you must get final approval from Group Communications via [group.communications@lyreco.com](mailto:group.communications@lyreco.com).

**A service provider has asked me for a customer testimony during an event or on his website to promote his offer. Is this authorised?**

Use of the Lyreco brand by an external business partner shall in any case be

subject to Lyreco's prior authorization. In case of contractualization with any third-party you should make sure to have a provision stating such requirement from the third party prior to any use of the Lyreco brand. In case of doubt, please inform one of the reference contacts who will take the necessary steps to check if such prior authorization requirement is mentioned in the relevant contract. In any case the testimony content and format must be submitted for prior approval to Group Communications Team via email at [Group.Communications@lyreco.com](mailto:Group.Communications@lyreco.com) before any release of such testimony by the service provider.



### Reference document

- P MNG 087 - Communication



### Your reference contacts

- Your manager
- Your Communication team (Local or Group)
- Your Ethics referent
- The "Raise your concern" tool



Lyreco



# OUR SOCIETAL ENGAGEMENT

# Environment

## Our principles

### A historic commitment

The respect of the environment, the preservation of natural resources and the fight against climate change, are longstanding policies within Lyreco's values.

### Concrete evidence

We contribute to this commitment by adopting a Sustainability approach, by raising our colleagues and business partners awareness on more responsible practices, offering our customers products and solutions which are always more sustainable and by continuously improving our operational processes.

### ✓ MUST

- Consider the respect of the environment when making decisions.
- Follow local instructions regarding environmental impact (e.g., reducing and sorting waste, prohibiting single-use drinking cups, making energy savings, etc.).

### ✗ MUST NOT

- Conceal or ignore any inappropriate environmental practices from employees or business partners.
- Overpromise when communicating our corporate responsibility about environment.

## What if

### I am a purchaser. How can I ensure that suppliers I have selected comply with our environmental requirements?

Lyreco has implemented strict policies and procedures to ensure the full respect of the environment in all our business activities and decisions, wherever we operate. All suppliers must comply with these policies and procedures.

### I am a new Lyreco employee. What can I do to contribute to the company's environmental objectives?

Being ISO 14001 certified, environmental objectives have been specifically defined for our business activities. Please consult these objectives in order to contribute to them.

### A customer has requested more information concerning our environmental commitment. What information may I supply?

You can send the information published in the Sustainability report.

Each year, Lyreco provides and publishes a Sustainability report at Group level. Each subsidiary may also provide a local version of this report highlighting local facts and figures.



### Reference document

- MNG 010 - Suppliers Code of Ethics
- Sustainability report



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Human rights

## Our principles

### Fundamental rights

Lyreco prohibits any form of breach of human rights such as child labour or modern slavery.

### An integrated assessment

The Sustainability assessment of our suppliers is part of our auditing and selection processes.

### ✓ MUST

- Treat everyone, internally or externally, with dignity and respect.
- Be vigilant against any form of infringement of human rights.

### ✗ MUST NOT

- Conceal or ignore any breach of human rights internally or externally.
- Try to resolve, by yourself, any issue relating to human rights.

## What if

**I read in the papers that one of our suppliers is suspected of being directly or indirectly involved in a case of modern slavery or child labour. How should I respond?**

Share the information immediately with one of the reference contacts so that an investigation may be conducted and the information may be clarified. Our suppliers are required to apply standards equivalent to ours. In such a situation, vigilance is required considering the potential impact on Lyreco's reputation.

**I am a purchaser and I would like to select a new supplier for Lyreco branded products. I know that prerequisite criteria for selection are required. May they be requested after selecting the supplier?**

No. A Sustainability assessment for all suppliers providing Lyreco branded products is a prerequisite before any supplier selection. Only suppliers that have been duly assessed and approved may be selected.

**A customer wants to know the Lyreco process implemented for**

**reducing the Sustainability risks in our supply chain. What information can I share with him?**

The Sustainability report is provided and published every year and is the reference document which can be sent to him. You will find a detailed description of our Sustainability policies therein. Furthermore, you may also share our vigilance plans which set out the latest relevant facts and figures.



### Reference document

- MNG 010 - Suppliers Code of Ethics
- MNG 009 - Vigilance Plans
- Sustainability report



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Political activities and lobbying

## Our principles

### Political neutrality

Lyreco does not support or finance any political party or organisation.

Any employee may, as an individual, contribute to political activities on a personal basis but must not, under any circumstances, give the impression of representing Lyreco.

### No lobbying

On principle, any lobbying activities on behalf of Lyreco are prohibited.

## What is it?

Lobbying refers to any action or communication towards public or political authorities for the purpose of influencing a decision.

### ✓ MUST

- Respect the political choices and opinions of colleagues.
- Avoid any political communication on behalf of Lyreco.

### ✗ MUST NOT

- Carry out political activities within Lyreco.

## What if

**I find climate change very worrying. I am an active member of a reputable association which undertakes lobbying actions towards local governments to encourage them to act against climate change. I am proud of Lyreco's commitments regarding the climate. May I use Lyreco's name and actions as leverage?**

You are free to be part of any association or organisation and conduct active campaigns to support a cause in which you believe. These types of activities must strictly remain in the private sphere.

Under no circumstances should the brand, facilities and actions of Lyreco be associated with your personal engagement or used to influence the public authorities.

**I would like to get involved in politics and I foresee presenting myself in a local or national election. Do I have the right to do this?**

You are free to be part of any political activities, whether as a member of a political party or by presenting

yourself for election, as long as you do not use the brand, facilities or premises of Lyreco to improve your profile or support your campaign. Political activities must remain strictly in the private sphere. Your name must not, under any circumstances, be associated with Lyreco in this context.



### Reference document

- P MNG 084 - Lobbying and sponsoring



### Your reference contacts

- Your manager
- Your Ethics referent
- The "Raise your concern" tool

# Citizenship and societal engagement

## Our principles

### A concrete commitment

As a responsible corporate citizen, Lyreco is committed to international or local social and citizen activities.

In 2008, Lyreco created “Lyreco For Education”, a programme to support the education of children in the poorest countries.

### No sponsorship

On principle, any form of sponsorship is forbidden. Instead, material or financial support to local communities on behalf of Lyreco may be authorised, under certain conditions.

## What is it?

Sponsorship refers to financial or material support granted to an event or programme (generally in the field of sports, arts, entertainment or charitable actions) for the purposes of promoting its brand or image.

### ✓ MUST

- Act transparently when supporting local communities.
- Record all donations offered for accounting purposes.

### ✗ MUST NOT

- Use the engagement towards “Lyreco For Education” or any other local charitable organisation as commercial leverage.
- Support any organisation that could harm Lyreco’s reputation.

## What if

**I would like my subsidiary to support a charitable organisation in addition to “Lyreco For Education”. Is this possible?**

Any support or funding aimed at a local charitable organisation must be approved. Before you commit yourself to such local actions, ensure that the organisation you would like to support has good references. Funds must be clearly allocated to specific actions carried out by the organisation and the impacts on the community must be measured by means of key indicators.

**I have been contacted for the purposes of Lyreco sponsoring a sport event. How should I respond?**

Sponsorship is not, in principle, authorised in accordance with Lyreco’s internal policy. You should refuse such a request.

**A potential customer supports a charitable organisation. If Lyreco supports the same organisation, I think that this would help us to win this customer’s account. Am I right?**

Supporting a charitable cause for

commercial purposes is strictly unethical and contrary to Lyreco’s values. All our resources are dedicated to “Lyreco For Education”. We recommend that you present the efforts accomplished by Lyreco for “Lyreco For Education” to your customer. Please feel free to invite your customer to join us in this project. Additionally, considering the number of customers and suppliers working with Lyreco, we are unable to permit ourselves to support all of their charitable projects.



### Reference document

- P MNG 084 - Lobbying and sponsoring



### Your reference contacts

- Your manager
- Your Ethics referent
- The “Raise your concern” tool



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