

CODE<sup>OF</sup>  
ETHICS  
2020

*Lagardère*

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# MESSAGE FROM THIERRY FUNCK-BRENTANO

Dear Colleague,

You will find below the new, revised and updated version of the Lagardère group Code of Ethics, which sets out the fundamental principles that must be applied in our business activities.

The Code was first published in 1994, laying down the main principles and overall framework governing the activities carried out by the women and men working for the Group. It is primarily based on the Group's compliance with the international principles and laws governing its businesses. Not only a list of restrictions, the Code is also designed as a guide and decision-making tool. It is in no way intended to replace the national and international rules applicable in the countries in which the Group operates, but to complement them.

The Code represents a minimum standard that must be applied in all Group entities. However, these entities are at liberty to add other rules or principles of conduct that are more detailed and/or more suited to their line of business or to the specific regulatory, ethical and business environment in the countries in which they operate. These rules must not run counter to the Group Code of Ethics. In the event of a contradiction, the strictest rules prevail.

This Code is updated regularly to take account of changes within the Group and in its operating environment, and to address new requirements that affect how we conduct our business. I therefore ask you to read this revised Group Code of Ethics and make it your own.

I hope the Code makes interesting and fruitful reading.



**Thierry Funck-Brentano**

Co-Managing Partner, Lagardère SCA  
Chief Human Relations, Communications  
and Sustainable Development Officer

# FOREWORD BY MANAGEMENT

**T**he integrity and excellence of all those who work for the Lagardère group are crucial to the Group's success.

Anyone who works for the Group, in any capacity, is required to comply with this Code. It is the responsibility of each of us to respect and promote the Code and to put it into practice in our dealings with all of our external partners.

We trust our Employees to perform all Group activities for which they are responsible, either directly or through external partners, in accordance with the relevant local legislation, and in accordance with the principles laid down in this Code.

For many years, we have worked hard to promote and abide by stringent ethical standards, which are central to our values and corporate culture. The Code is one of the core documents underpinning the Group's Corporate Social Responsibility (CSR) policy.

It represents our values, our culture and our commitment.



**Arnaud Lagardère**

General and Managing Partner,  
Lagardère SCA



**Pierre Leroy**

Co-Managing Partner,  
Lagardère SCA



**Thierry Funck-Brentano**

Co-Managing Partner,  
Lagardère SCA



**Arnaud Nourry**

Chairman and  
Chief Executive Officer,  
Hachette Livre



**Dag Rasmussen**

Chairman and  
Chief Executive Officer,  
Lagardère Travel Retail



**Constance Benqué**

Chief Executive Officer,  
Lagardère News

# GENERAL PRINCIPLES

## SCOPE OF APPLICATION

The rules laid down in the Code of Ethics apply to all those involved in the Group's activities. They apply to management<sup>(1)</sup> and Employees of Group companies – with the term "Employees" including staff on secondment and temporary workers – and to Lagardère's agents and representatives.

Similarly, the Group also expects its external partners<sup>(2)</sup> to share and comply with these rules.

## DISSEMINATION AND APPLICATION

Lagardère will make the latest version of this Code available to its Employees. The full text of the Code can be found on the Group's website ([www.lagardere.com](http://www.lagardere.com)) and intranet portal (<http://enter.lagardere.net>) in English, French, German and Spanish.

To comply with the general principles of the Code, Employees must:

- familiarise themselves with the rules of the Code and apply them in their day-to-day duties;
- behave in a way suited to their working environment;
- show sensitivity and respect for others, as well as for the Group's values and for difference;
- ensure that their external partners act in compliance with the rules set out in the Code.

Group entities are responsible for ensuring that the Code is disseminated and implemented. The Group ensures that it is duly and properly applied.

## EMPLOYEE SUPPORT AND ASSISTANCE

The Group and all Group entities assist Employees in their understanding and application of the principles and values set out in this Code. They may call on legal experts where necessary to ensure that the Code is properly applied in their day-to-day duties.

## FAILURE TO COMPLY WITH THE CODE OF ETHICS

Failure to comply with the rules set out in this Code may constitute a criminal offence or practice that could result in criminal penalties for the individual(s) concerned.

The appropriate disciplinary measures may also be taken pursuant to the internal rules and regulations of each entity concerned.

(1) The term "management" refers to members of the administrative, executive and management bodies of Lagardère group entities.

(2) The term "external partners" refers primarily to the Group's suppliers, distributors, subcontractors, franchisors and franchisees, and to governments and local authorities.

# LAGARDÈRE GROUP CODE OF ETHICS

Lagardère aims to conduct its business honestly and impartially and in accordance not only with legislation in force in all the countries in which it operates, but also with the rules set out in this Code.

These rules must be applied continuously in the context of relations among the Group's Employees, and with the Group's external partners, competitors, customers, shareholders and civil society in general.

**Ethics Line** is a confidential platform for reporting suspected unlawful or unethical activities or behaviour within the Group. **For more information, please refer to the “Whistleblowing system” section on page 21 of this Code.**

# 1

## UPHOLDING FUNDAMENTAL RIGHTS

### HUMAN RIGHTS AND WORKING CONDITIONS

As universal values, human rights form the very basis of the values adopted by Lagardère, which promotes and complies with:

- the principles set out in the International Bill of Human Rights<sup>(1)</sup>;
- the fundamental principles of the International Labour Organization (ILO);
- the United Nations Guiding Principles on Business and Human Rights;
- the United Nations Global Compact, of which the Group has been a signatory since 2003;
- the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD).

The Group expects its Employees and external partners to strictly uphold these fundamental rights, in particular those relating to:

- freedom of association;
- respect for privacy;
- recognition of the right to negotiate industrial relations agreements;
- prohibition of child labour and of forced or compulsory labour;
- prevention of discrimination in employment practices.

The Group’s Employees and external partners are also required to comply with local regulations regarding employment and working conditions.

Specifically, Lagardère undertakes to:

- maintain an ongoing dialogue with its stakeholders as part of a continuous improvement process;
- propose reporting procedures for all stakeholders within the countries and business entities concerned;
- regularly assess risks of non-compliance with human rights and conduct frequent audits and checks.

(1) Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.

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# 2

## RELATIONS WITHIN THE GROUP

Lagardère is committed to being a responsible employer in order to foster the motivation and creativity among its Employees that are essential for the Group's success.

### WORKING CONDITIONS AND HEALTH AND SAFETY POLICIES TO PROTECT EMPLOYEES' PHYSICAL AND MENTAL HEALTH

The Lagardère group pays close attention to the working conditions of its direct and indirect Employees. It strives to provide a safe, healthy working environment in compliance with all applicable legal requirements. In any situation that endangers an Employee's life or health, it recognises the value of the right to stop working. The Group makes every effort to reduce health risks and occupational risks by endeavouring to identify, prevent and manage accidents and risks of all kinds. Group entities are responsible for continuously monitoring all risks to which they may be exposed directly or indirectly. The Group also strives to provide sufficient information to enable all Employees to fulfil their duties, and to ensure efficient industrial relations so that such matters can be dealt with locally.

All Employees are required to respect Group rules concerning health, hygiene and safety at work, and to take all reasonable precautions to maintain a safe and healthy working environment. Employees must also ensure that their actions do not put themselves or others at risk, and that they are aware of the procedures to follow in the event of a workplace emergency. They must report to their superiors any behaviour, installation or situation that could compromise the safety of their working environment, along with any accident or incident, even a minor one.

### FIGHTING DISCRIMINATION

Lagardère is committed to treating all of its Employees equally, and to maintaining fair employment practices. The Group is opposed to all forms of discrimination based on a person's origin, lifestyle, age, sex, sexual orientation, political or religious opinions, trade union affiliation or disability.

The Group is neutral with respect to all religions and upholds a secular view of the workplace. Lagardère respects its Employees' beliefs and opinions, as well as their religious practices provided that these do not adversely affect the Group's internal organisation or operations. As regards the observance of religious holidays, the Group bases its policy on the legal framework in its various countries of operation.

To comply with these rules, Employees must not discriminate against any other Employees for any reason whatsoever.

### PROMOTING RESPECT FOR OTHERS AND ZERO TOLERANCE OF HARASSMENT

Mutual respect between Employees, regardless of their level of responsibility, is a core Group value and Lagardère asks all Employees to be sensitive in their language and actions towards other people.

The Group forbids all forms of mental and physical coercion and corporal punishment for disciplinary purposes, as well as all forms of harassment. Inappropriate behaviour and comments of a sexist and/or sexual nature are prohibited. Demeaning acts, violence and abusive language are not warranted in any work situation.

These rules apply to all Employees and all managers, who must lead by example.

### INDUSTRIAL RELATIONS

Lagardère recognises the importance of having independent, freely-elected Employee representatives in order to maintain regular dialogue with management on subjects relating to health and safety, working conditions and organisational changes that may affect Employees' work. In all countries, the Group complies with rules that allow Employees to organise and form their own representative authorities. It also guarantees that these representatives have access to work areas and to the Employees.

### MANAGEMENT

The Group makes every effort to help Employees fulfil their career potential by providing working conditions that emphasise mutual respect and by promoting a management approach that encourages Employees to take responsibility and use their initiative. Teamwork is one of the key unifying elements of the Group's corporate culture and is therefore promoted by Lagardère as a means to maintain a productive, high-quality working environment.

All managers must therefore set an example in their day-to-day work and encourage ethical conduct. They must support their staff when they request it by providing help or advice, and organise their staff in such a way as to promote a healthy work-life balance.

Lagardère is committed to complying with the legal framework governing working hours and the right to a weekly rest period.

### TRAINING AND PROMOTION

The Group is committed to developing Employees' professional skills and responsibilities. This is crucial in ensuring Lagardère's success. The Group attaches great importance to the principles of equal opportunity and fair treatment, by rewarding merit and performance. It also supports Employees' development, through promotion, internal mobility and training to enhance their employability.

All those in positions of responsibility must respect these commitments and pay close attention to the training, promotion and fair treatment of Employees.

### CONFIDENTIALITY OF INFORMATION AND PROTECTING THE PRIVACY OF EMPLOYEES

Lagardère fully respects the privacy of its Employees and is committed to ensuring the confidentiality of any personal information relating to Employees that it may collect or hold. The Group's entities are responsible for establishing procedures, in compliance with current national legislation, to protect Employees' personal information, and to make the necessary disclosures to the relevant organisations.

As a result, any person handling personal data relating to Employees must ensure that he/she retains only those data that are necessary for the operations falling under their responsibility, and that the data are stored for the appropriate period in complete security, in accordance with Group policy. That person must also ensure that the data are only passed on to authorised persons and only where necessary, and that the data cannot be accessed by persons outside the Group, except where necessary due to legal obligations.

Employees who have any questions or require further information on this matter may contact the person in charge of liaising with the local data protection authority, in particular the Data Protection Officer within their division.

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# 3

## RELATIONS WITH EXTERNAL PARTNERS AND COMPETITORS

The Group’s relations with its external partners<sup>(1)</sup> must be based on mutual respect, in order to facilitate dialogue, interaction and co-operation. All Employees are expected to act fairly and impartially with respect to the Group’s external partners and competitors, and to maintain respectful working relationships with them that comply strictly with the applicable legislation. Lagardère expects its external partners to share these principles.

### COMPETITION AND FAIR BUSINESS PRACTICES

Regulations covering business practices, especially those concerning competition and price transparency, are designed to maintain a competitive economy and promote fair competition.

Lagardère considers that it is in its interests to develop its business in sectors with healthy trading practices that enable all players to fulfil their potential. The Group’s activities are therefore based on fair and honest business practices.

Lagardère respects the principles of fair competition and forbids the use of unlawful or unfair practices to obtain a competitive advantage. In particular, the Group undertakes to:

- forbid all types of agreements between Lagardère and its competitors which seek to coordinate their strategies on a given market, share customers or regional markets among them, or exchange business-sensitive information with no appropriate legal framework;
- ensure that projects or offers developed in partnership with its competitors provide customers with better service and in no way eliminate competition with those partners, and that only the information strictly necessary for implementing the partnership is exchanged between the parties;
- maintain its independence in establishing its sales prices or commercial offerings;
- comply with the rules governing competitive processes when taking part in any tenders and refrain from any practices designed to circumvent or disrupt competitive tenders, in both its relations with its competitors as well as with the companies launching the tenders.

Owing to the potential complexity and challenges relating to the practical application of competition law, the Group recommends adopting a prudent approach.

<sup>(1)</sup> The term “external partners” refers primarily to the Group’s suppliers, distributors, subcontractors, franchisors and franchisees, and to governments and local authorities.

### PROHIBITION OF CORRUPTION

Lagardère places particular importance on complying with OECD anti-corruption guidelines. The Group has zero tolerance of corruption. Its anti-corruption policy and specific anti-corruption procedures reiterate the Group's ethical standards and are applicable to all.

The Lagardère group therefore refuses to promise, offer, authorise, grant, solicit or accept illicit payments or other undue advantages with a view to winning or retaining a contract, unlawfully influencing the decision-making process, or abusing any real or supposed influence on a third party to obtain a favourable decision or any other unfair advantage.

More generally, these principles apply in dealings with its customers, private or public sector suppliers, as well as government bodies and agencies, particularly within the scope of activities subject to public procurement or authorisation procedures.

All Employees are required to observe the applicable legislation in this area and to respect the compliance procedures set up within the Group to prevent and identify any corruption risks.

### SERVICES OF PAID INTERMEDIARIES

The use of paid intermediaries is only warranted if it involves actual, practical services and complies strictly with applicable legislation and regulations.

All Employees must ensure strict compliance with the procedures in place within the Lagardère group when engaging the services of a paid intermediary, in such a way that the Group cannot be held liable for the intermediary's actions. These procedures include carrying out upstream checks, drawing up a formal agreement and monitoring the arrangement from an operating perspective. All Employees must ensure that the intermediary is paid for the services actually provided, as set out in the agreement. Before engaging any intermediary, Employees should also systematically ensure that there is no conflict of interests between that intermediary and other stakeholders.

### CONFLICTS OF INTERESTS

All Employees could potentially find themselves in a position where their personal interests, the interests of a person or legal entity connected<sup>(1)</sup> to them or the interests of a person close to them (i.e., a close family member<sup>(2)</sup>) could potentially conflict with the Group's interests or give the impression of impropriety.

Employees should therefore avoid any situation that could give rise to a conflict of interests, and must inform their superiors if they find themselves in a situation involving an actual or potential conflict of interests.

In general and as a precautionary measure, all Employees should be able to justify the fairness and integrity of their practices in their dealings with external partners and competitors.

(1) The term "connected" refers to any direct or indirect link between a third party (such as a supplier, customer, partner, competitor or any other person with whom a working relationship has been formed) and an Employee. With respect to a third party, an Employee might, for example, be an employee, consultant, manager, corporate officer, shareholder, partner, member of an association or private customer.  
(2) For the purposes of this Code, "close family member" means the Employee's spouse or partner, parents, grandparents, children, brothers or sisters, in-laws (mother-in-law, father-in-law, daughter- or son-in-law), first cousins or any member of the family unit.

### GIFTS AND OTHER BENEFITS

Corporate gifts, invitations and other benefits (such as entertainment, discounts and services) intended to develop respectful relations, reinforce brand image or promote products and services are a common business practice.

Employees who offer, propose or promise gifts or invitations or who take any action with the aim of influencing the intended beneficiary in order to obtain preferential treatment or an undue advantage, in breach of legislation or the duty of loyalty towards their employer, will be held liable for corruption.

If corporate gifts or other benefits are accepted from a third party or offered to a third party, this must be done strictly in accordance with the conditions set by Group procedures and with the rules applicable to each Lagardère group entity.

Soliciting corporate gifts or other benefits is strictly prohibited.

### CONTRIBUTIONS TO POLITICAL AND/OR RELIGIOUS ORGANISATIONS BY OR ON BEHALF OF GROUP ENTITIES

Independence is one of the Lagardère group's key values, and it has therefore always maintained a neutral position with respect to politics and religion. The Group and its Employees therefore agree, within the scope of their duties, not to contribute – including contributions of working time or loans of materials – to religious organisations, political groups or organisations whose purpose is to promote political parties, or to candidates' campaigns in national or local elections.

### RESPONSIBLE PROCUREMENT POLICY

The Group seeks to maintain and promote responsible and fair relations with its suppliers and subcontractors.

Through its Responsible Procurement Policy, Lagardère looks to maintain fair business relations and closely monitors compliance with negotiated purchasing and payment terms. In return, the Group expects its suppliers and subcontractors to conduct their activities in a manner that furthers its own social, environmental and business sustainability goals.

In particular, Lagardère requires its partners, and indirectly any partners of its partners, to comply with the corporate social responsibility principles set out in its Responsible Supplier Charter. This Charter outlines the requirements to be respected by its suppliers with a view to maintaining sustainable business relations and covers:

- working conditions: prohibition of child labour and forced or compulsory labour along with all forms of discrimination, as well as specific requirements in terms of working hours, remuneration, employee health and safety and freedom of association, etc.;
- environmental conditions: management of raw materials, waste, water and air emissions, hazardous substances, etc.;
- conditions relating to the conduct of business: prohibition of corruption, compliance with international sanctions, etc.

#### **PROMOTING THE PRINCIPLES OF THIS CODE TO THE GROUP'S EXTERNAL PARTNERS**

Lagardère undertakes to promote the principles described above as well as the existence of the Code of Ethics, including providing a link to it, when entering into agreements with third parties involved in its activities, such as suppliers, service providers and subcontractors. The Group also expects its external partners to uphold principles similar to those enshrined in this Code.

#### **COMPLIANCE WITH INTERNATIONAL ECONOMIC SANCTIONS**

The Group has a policy to enforce compliance with international economic sanctions and other similar applicable measures, whether relating to prohibited activities or measures taken to freeze the assets of certain parties.

#### **COMBATING MONEY LAUNDERING**

The Group seeks to ensure that its activities are not used to launder money and that its transactions and business partners are legitimate.

**Ethics Line** is a confidential platform for reporting suspected unlawful or unethical activities or behaviour within the Group. **For more information, please refer to the “Whistleblowing system” section on page 21 of this Code.**

# 4

## RELATIONSHIPS WITH CUSTOMERS

Lagardère’s success is based on respecting its customers and ensuring their satisfaction. Among other things, this requires all Employees to deal with customers in an entirely fair manner, in order to build and maintain strong, trusting relationships with them.

### PRODUCT AND SERVICE PERFORMANCE

The Group aims to forge close, lasting relationships with its customers, by providing them with high-quality products and services that meet their needs and expectations.

Every Employee is expected to contribute to these goals, by:

- paying close attention to customers, without assumptions or preconceived ideas, in order to anticipate their needs and offer them a variety of products and services;
- meticulously monitoring the products and services that the Group provides, and seeking to innovate and improve the quality and safety of those products and services.

### FOOD HEALTH AND SAFETY

The Group closely monitors compliance with food health and safety rules in its take-away and eat-in sales outlets. Food Safety Guidelines have been defined to serve as a reference in all countries engaged in the food business. These guidelines set out the policy along with strict rules that are sometimes more demanding than local hygiene regulations.

### FAIR ADVERTISING AND MARKETING

Lagardère aims to establish customer relationships based on respect and trust. It therefore strives to ensure that the information customers are given is as honest and fair as possible. In this respect, Lagardère complies strictly with advertising and marketing regulations.

As regards the advertising services that the Group provides to its customers, all Employees must have detailed knowledge of the applicable regulations as regards transparency and must comply with them.

### CONFIDENTIALITY OF INFORMATION AND PROTECTING THE PRIVACY OF CUSTOMERS AND SUPPLIERS

Each Employee is responsible for protecting information on customers and suppliers, particularly any personal information collected or held by Lagardère, to ensure that the information is not disclosed or used in any way that is forbidden or inappropriate.

As a result, any person handling personal data relating to customers or suppliers must ensure that he/she retains only those data that are necessary for the company's business operations, and that the data are stored for the appropriate period in complete security, in accordance with Group policy. That person must also ensure that the data are only passed on to authorised persons and only where necessary.

Employees who have any questions or require further information on this matter may contact the person in charge of liaising with the local data protection authority, in particular the Data Protection Officer within their division.

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# 5

## RELATIONS WITH SHAREHOLDERS

The Group is committed to treating its shareholders with respect and to being deserving of their trust. Lagardère therefore makes every effort not only to maximise the value of its assets, but also to develop and protect them to the best of its ability.

### PROTECTING THE GROUP'S ASSETS AND BRANDS

Employees must ensure that they act in strict compliance with the rules for protecting the Group's assets and brands. They are responsible for protecting property belonging to Lagardère and for using it efficiently and appropriately in the course of their duties.

All necessary measures must be taken to safeguard the Group's assets and brands.

More generally, all Employees are responsible for protecting the Group's physical and intangible assets from loss, damage, improper use, theft, misappropriation of funds or destruction.

Employees are also required to use the Group's resources solely for the purposes of their duties and not to discredit Lagardère's good name or reputation. The Group's resources must not be used by its Employees for their own purposes or to compete with Lagardère, directly or indirectly.

### TRANSPARENCY OF FINANCIAL REPORTING

The Group takes great care to provide its shareholders and the financial community with information that is intelligible, relevant and reliable. It listens to their opinions, primarily through the Shareholders' Consultative Committee. The Group also ensures that it complies strictly with stock market regulations, and that its financial statements accurately reflect its operations.

Employees are required to duly and accurately report all financial and accounting transactions relative to their activities, and to provide appropriate, genuine documentary evidence to support all accounting entries.

Employees solicited by the statutory auditors in the course of their audit must work honestly with those auditors and not do anything that may mislead them in their work.

Employees directly or indirectly involved in preparing reports or information for publication on any media whatsoever, or who communicate regularly with the press, investors and analysts about the Lagardère group, must ensure that the reports or information in question are complete, fair, appropriate, accurate and intelligible, and that they comply with applicable regulatory requirements and with all of the procedures in place within the Group.

## CONFIDENTIALITY OF INFORMATION ABOUT THE GROUP

Lagardère is committed to the principle of equality of information for all third parties. The Group considers that information has not been made public if it has not been widely disseminated to investors or any other third party.

### **I. CONFIDENTIAL INFORMATION**

The term “confidential information” includes all non-public information that, if disclosed, could be used by Lagardère’s competitors or could be damaging to the Group, its partners or its customers.

Employees must keep such information confidential, even after they have ceased to work for the Lagardère group.

### **II. INSIDE INFORMATION**

In accordance with the Confidentiality and Market Ethics Charter applicable to Lagardère group Employees, inside information held by Employees must remain confidential as long as the Group has not made it public.

The Employees concerned are required to act in compliance with this Charter.

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# 6

## SOCIAL RESPONSIBILITY

The Group wants its activities to play a role in improving the living conditions and wellbeing of communities in the countries in which it is based.

It is therefore committed to taking part in these countries’ economic and social development, for which it works with local stakeholders.

The Lagardère group also seeks to participate in civil society.

It supports partnership and corporate sponsorship initiatives. The management teams of the Group’s different entities are free to choose which initiatives to support, provided that they do not clash with the Group’s communications policy or with requirements concerning relationships with partners.

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# 7

## ENVIRONMENT

The Lagardère group believes that respecting and protecting the natural environment are critical issues. It is therefore committed to reducing the environmental footprint of its businesses on an ongoing basis.

Lagardère expects its Employees to make these issues central to the way they work. Every Employee is therefore responsible, within the bounds of his or her duties, for helping the Group fulfil its commitments by complying with applicable regulations and internal policies regarding environmental protection.

### PROMOTING FUNDAMENTAL ENVIRONMENTAL PRINCIPLES AND COMPLIANCE WITH EXISTING REGULATIONS

As a responsible company, Lagardère ensures that the development and growth of its business are managed with due regard for the natural environment and for applicable local, national and international environmental regulations.

The Lagardère group is aware that its wealth is partly dependent upon the protection of the natural environment, and it also wishes to limit environmental risks and the impact of its operations. Lagardère is therefore keen to incorporate fundamental environmental management rules into its activities, such as the prevention and precautionary principles.

### ENVIRONMENTAL ACCOUNTABILITY

Lagardère has established a policy aimed at limiting the environmental impacts of its activities. Specifically, this involves meeting climate change goals and protecting natural resources through:

- combating and reducing waste and promoting the circular economy;
- optimising energy consumption;
- using raw materials responsibly.

In practice, this means:

- increasing the percentage of certified paper purchased for the production of paper products (books and magazines);
- using recycled paper wherever possible;
- gradually reducing greenhouse gas emissions linked to its business activities as part of its low-carbon strategy;
- enhancing the sustainability of its products (shorter distribution channels and reduction in food waste and disposable plastics, etc.).

The Group promotes these goals and commitments to its various entities and throughout its value chain, where necessary by involving all economic partners concerned (subcontractors, suppliers, licensees, etc.).

# WHISTLEBLOWING SYSTEM

As part of its ethical and risk prevention approach, Lagardère encourages any suspected unlawful or unethical behaviour to be reported.

Ethics Line, a dedicated secure reporting platform that can be accessed from the Group's website ([www.lagardere.com](http://www.lagardere.com)), was set up for this purpose.

The multilingual Ethics Line platform, which is also available to all stakeholders, is managed by an external service provider and can be accessed around the clock.

Reports are received by the service provider and by a limited number of qualified Employees who are bound by strict confidentiality rules.

The Lagardère group ensures that any information reported by users of the platform remains strictly confidential. It also seeks to protect users' interests as well as the interests of those whose behaviour has been reported.

The Ethics Line platform can be notably used to report information about:

- infringements of trade secrets;
- infringements of personal data protection rules;
- cybercrime;
- infringements of human rights and fundamental freedoms;
- environment and natural resources;
- competition and unfair business practices;
- conflicts of interests;
- corruption and influence peddling;
- discrimination, harassment and sexism;
- individual health and safety;
- tax, accounting or financial offences, internal fraud and money laundering;
- international economic sanctions and embargoes.

# EMPLOYEE STATEMENT OF COMPLIANCE

To be filled in and returned to your company's Human Resources Manager.

I, \_\_\_\_\_  
\_\_\_\_\_

an Employee of \_\_\_\_\_  
which is part of the Lagardère group,

hereby declare that I have received and read, and will comply with,  
the Group Code of Ethics.

Place: \_\_\_\_\_

Date: \_\_\_\_\_

Signature