

to the attention of our partners

Code of Conduct 2025

We are the Chantelle Group, an international creative studio based in Paris and a family business that has been designing lingerie since 1876. Through our 6 brands and networks: Chantelle, Chantelle X, Chantelle EasyFeel, Chantelle Pulp, Livera, and Darjeeling, built on principles of collaboration and innovation, we seek to think about and represent lingerie differently.

Respect, creativity, sustainability, and honesty are values that drive us and that we believe are important to uphold. For 150 years, we have strived to manage our growth in a virtuous manner.

Driven by a vision of responsible entrepreneurship, we wish to share our values and present the code of conduct that guides our Group's commitments and our employees' actions.

Eager to promote the value chain relevant to our activity, we also wish to communicate on the commitments undertaken by our production partners, who are themselves required to ask their stakeholders to subscribe to these commitments.

We strongly encourage transparency. If you have any concerns, do not hesitate to discuss them with your contact person at Chantelle.

In addition, you also have the option of submitting a formal report, notably by using our online reporting tool, accessible via a secure link. This channel is accessible to both internal staff members and external stakeholders, such as staff members of our production partners, and also staff members of their own suppliers. Reports can be made to report behavior that violates the law or that violates our code of Conduct or other company policies. Each report will be handled thoroughly, confidentially, and impartially.

Our aim is to act with integrity and to build lasting relationships with our stakeholders.

The following points are discussed herein:

I. RELATIONS WITH OUR CUSTOMERS

1.1 Personal Data

1.2 Product Safety

II. RELATIONS WITH OUR EMPLOYEES

2 The Chantelle Code of Conduct

III. RELATIONS WITH OUR PRODUCTION PARTNERS

3.1 Chantelle's Commitments

3.2 Commitments of Our Partners as Responsible Employers

3.3 Commitments of Our Partners to Business Ethics

3.4 Commitments of Our Partners to Environmental Preservation

IV. ALERT PROCEDURE

I. RELATIONS WITH OUR CUSTOMERS

Wherever the Chantelle Group and its subsidiaries are present, customers must be treated with respect for their rights and requirements.

1.1 OUR COMMITMENTS REGARDING PERSONAL DATA

- ❖ The Chantelle Group undertakes to make clear and accessible information regarding the data collected and its purpose to its consumers.
- ❖ Only personal data strictly necessary for the purpose of processing will be collected.
- ❖ It will be easy to contact each brand of the Chantelle Group in case of questions, complaints, or requests to exercise a right. The DPO is the preferred point of contact. A response will always be provided.
- ❖ The Chantelle Group undertakes to implement all means to ensure the security of its customers' personal data. They will only be transmitted, internally, to authorized persons. These persons are sensitized to the processing of personal data.
- ❖ In the event that the collection or management of personal data is entrusted to an external service provider, the Chantelle Group undertakes to ensure that this service provider takes all security measures to ensure compliance with the GDPR.
- ❖ The Chantelle Group undertakes to respect the trust of its customers by applying the legal provisions in force regarding personal data protection.
- ❖ The Chantelle Group undertakes to prioritize hosting within the European Union and, failing that, undertakes to ensure that data hosting takes place in countries ensuring a level of protection equivalent to that offered in the European Union, referring to the recommendations of the CNIL.

#1.2 OUR COMMITMENTS REGARDING PRODUCT SAFETY

- ❖ The Chantelle Group undertakes to comply with national and international regulations relating to product safety.
- ❖ It undertakes, in particular, to implement appropriate control procedures so that products placed on the market are not likely to harm the health of customers.
- ❖ The Chantelle Group undertakes to establish and continuously improve procedures to ensure the best management of a complaint that would reveal a potential health or safety issue and to always take into consideration information communicated to us by our customers, the administration, or an association concerning the safety and harmlessness of our products or quality controls.

II. RELATIONS WITH OUR EMPLOYEES

The group is convinced that attention to its employees is an essential component of its responsible performance. Working conditions must be conducive to the full development of each employee.

The Chantelle Group undertakes to prioritize international law over local rules when the former are more favorable, in compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

The **Chantelle internal code of conduct**, [Internal code of conduct - Nov. 2024.pdf](#) supported by the Group's managers and signed by employees, specifies the commitments undertaken by the Group and its employees, particularly in matters of integrity, compliance with Laws and international standards, professional ethics, protection of human rights, respectful working conditions, and business ethics.

III. RELATIONS WITH OUR PRODUCTION PARTNERS

#3.1 CHANTELLE HAS ESTABLISHED A COMPLIANCE PROGRAM APPLICABLE TO ITS SUPPLY CHAIN

The ethical commitments of the Group and its subsidiaries require compliance with certain rules in relations with its Production Partners, who must always be treated fairly, honestly, and equitably.

The Chantelle Group's supply chain compliance program applies a "zero tolerance" policy to the following non-compliances:

- ❖ Child labor
- ❖ Forced labor (e.g. withholding of identity papers, imposed overtime)
- ❖ Exploitation or endangerment of workers
- ❖ False declarations of working hours (double accounting)
- ❖ Unauthorized subcontracting
- ❖ Attempted bribery of external auditors
- ❖ Refused access during audit phase
- ❖ False documents or certifications
- ❖ Serious and regular non-compliances without willingness to improve
- ❖ Production in a prohibited country (such as Turkmenistan, Uzbekistan, Pakistan, Myanmar, Xinjiang Province in China)

OUR COMMITMENTS

The Chantelle Group undertakes to:

- ❖ Apply and respect national or international regulations in force in all countries where the Chantelle Group is present. In case of contradiction between two rules, we apply the stricter one.
- ❖ Ensure not to place its Production Partners in a situation of economic dependence.
- ❖ Promote constructive exchange with its Production Partners and communicate our requests as early as possible so as to allow stakeholders the necessary time to influence decision-making.
- ❖ Only use Production Service Providers who share its commitments to integrity, compliance with Laws and international standards, protection of human rights, respectful working conditions, and business ethics, with the commitment to prioritize international law over local rules when the former are more favorable, as this issue must be addressed throughout the entire value chain.
- ❖ Cease working with a Production Partner who repeatedly fails to meet our expectations or who does not respect our ethical principles, particularly regarding human rights and/or the fight against corruption, or who has been reported for serious breaches of said commitments and who does not present an action plan to comply by taking appropriate corrective measures.

#3.2 COMMITMENTS OF OUR PRODUCTION PARTNERS AS RESPONSIBLE EMPLOYERS

We ask our Production Partners to commit to:

- ❖ Respect:
 - Local laws,
 - Collective agreements, or failing that, agreements in their sector of activity,
 - The Universal Declaration of Human Rights,
 - The International Labour Organization conventions,
 - The United Nations Global Compact,
 - The OECD Guidelines for Multinational Enterprises,
 - All international and national rules, with the willingness to enforce international law over local rules when the former are more favorable than local rules.

- ❖ Conduct a risk assessment related to all clauses set forth in this section III "Relations with our Production Partners" and communicate this policy to suppliers whose materials are incorporated into products sold to CHANTELLE, in order to proactively reduce risks by identifying potential gaps and areas for improvement.
- ❖ Comply with the principles set out in this code of conduct, establish their own code of conduct, and ensure that their own partners do the same in the course of their activities, ensuring that workers have access to effective grievance mechanisms including multiple reporting channels, at least one of which is confidential, and proactively communicate on the alert procedure established by the Chantelle Group, open to any whistleblower.
- ❖ Guarantee the absence of any retaliation against any whistleblower, knowing that any retaliation brought to the attention of the Chantelle Group is subject to zero tolerance.
- ❖ Guarantee the absence of any discrimination, thus:
 - There shall be no discrimination in hiring, compensation, access to training courses, promotion, dismissal, or retirement based on caste, national origin, religion, age, disability, gender, marital status, sexual orientation, trade union membership, or political affiliation.
- ❖ Guarantee freedom of employment, thus:
 - There shall be no recourse to forced labor, indirect coercion to work, or involuntary labor of prisoners.
 - There shall be no retention of employees' identity papers by their employer; employees must remain free to leave their employment after reasonable notice if not regulated by local law. (International Labour Organization Conventions 29, 105, 182)
- ❖ Apply no restrictions on freedom of association and the right to collective bargaining, thus:
 - Employees must have the right to join or form a trade union of their choice and to participate in collective bargaining.
 - An open attitude towards the activities of trade unions and their organizational activities is expected.
 - Employee representatives may not be discriminated against and must be allowed to perform their representative duties in their workplace.
 - If the right to freedom of association and collective bargaining is restricted by local regulatory provisions, alternative methods to allow independent and free association and negotiations must then be facilitated rather than hindered.
- ❖ Strictly apply hygiene and safety rules in the workplace, thus:
 - The working environment, including break areas and nearby environments, must be safe, clean, and healthy. It must comply with hygiene and safety rules, taking into account industry knowledge and any specific hazards. All measures must be taken to avoid material and personal accidents arising from or associated with the work undertaken by minimizing, as far as possible, the causes of inherent workplace hazards.
 - Employees must regularly receive health and safety training.
 - Employees must have access to clean sanitary facilities and equipment allowing them to eat meals or take breaks in peaceful conditions.
- ❖ Prohibit child labor and thus:
 - Respect the minimum age for admission to any type of employment or work set by national legislation and employ no child below the minimum age required to leave the school system and, in any event, no child under 15 years of age;
 - If, however, the legal minimum working age is locally set at 14 years, in accordance with the developing country exceptions of ILO Convention No. 138, this shall apply.
 - Neither recruit nor exploit any child, in any manner whatsoever.
 - Employ no worker under 18 years of age in night shifts, or in conditions likely to jeopardize their health, safety or moral integrity and/or to be detrimental to their physical, mental, spiritual, moral or social development in accordance with ILO Convention No. 182.

- ❖ Not limit wages to the local legal minimum wage, thus:
 - Wages and benefits paid for an ordinary work week must meet, at a minimum, national legal standards or industrial standards, whichever is higher. In any case, the wage must be sufficient to cover basic needs and provide a disposable income.
 - Written and understandable information on their employment conditions regarding wages must be communicated to employees. In any event, employees must have been fully informed of their rights and obligations.
 - Wage deductions for disciplinary measures are prohibited. To be legal, any wage deduction, whatever it may be, must be based on an appropriate legal basis – national legislation, collective agreement or arbitration decision – as an individual agreement is not sufficient.
 - We ask suppliers to supplement their employees' remuneration by providing social benefits (particularly in the areas of healthcare costs, home-to-work transport, etc.)

- ❖ Apply working hours compliant with national laws, collective agreements, and provisions based on international labor standards by retaining the provisions that provide the best protection to workers, it being understood that:
 - The performance of work at home must not constitute a means of circumventing working time regulations.
 - Working hours, excluding overtime, must be defined by contract, and must not exceed 48 hours per week.
 - All overtime must be voluntary. Overtime must be used responsibly, taking into account the extent, frequency, and hours worked by individual workers and the workforce as a whole. It must not be used to replace regular employment. Overtime must always be paid at an increased rate, which is recommended to be not less than 125% of the regular rate of pay.
 - Total hours in any seven-day period must not exceed 60 hours.
 - Workers must receive at least one day of rest per seven-day period or, where permitted by national law, two days of rest per 14-day period.

- ❖ Promote regular employment:
 - Wherever possible, work performed must be based on a concrete employment relationship, established on national laws and practices.
 - Female employees who take maternity leave must be able to return to an equivalent position following this leave with the same wages and benefits.
 - It is forbidden to make employment conditional on any commitment or promise of commitment.
 - It is forbidden to avoid obligations imposed by labor or social security regulations for the regular employment relationship through the subcontracting of labor alone, subcontracting, arrangements for home work, or apprenticeship programs whose intention is not to provide skills or regular employment. It is also forbidden to avoid these obligations by the abusive use of fixed-term contracts.

- ❖ Ban all forms of intimidation:
 - Physical abuse or discipline, the threat of abuse, sexual or other harassment, and insults or other forms of intimidation are strictly prohibited.

- ❖ Prohibit all forms of harassment: Employees must be treated with respect and dignity. No form of coercion will be allowed. No physical, psychological, or any other form of harassment will be tolerated.

- ❖ Cease working with a Production Partner who, repeatedly, fails to meet the Chantelle Group's expectations, particularly regarding human rights and/or the fight against corruption, or who has been reported for serious breaches of these commitments and who does not present an action plan to comply by taking appropriate corrective measures.

#3.3 COMMITMENTS OF OUR PRODUCTION PARTNERS CONCERNING BUSINESS ETHICS

We ask our Production Partners to commit to:

- ❖ respect legality in all activities by applying and respecting national or international regulations in force.
- ❖ not perform services for Chantelle in countries or regions subject to international sanctions such as Turkmenistan, Uzbekistan, Pakistan, Myanmar, Xinjiang Province (China), etc.
- ❖ respect intellectual property, including trade secrets, confidential information, copyrights.
- ❖ refrain from subcontracting a service without prior acceptance and approval by Chantelle.
- ❖ accept all audits and provide all necessary information without omitting or concealing elements and the commitment to take into consideration the recommendations resulting from these audits.
- ❖ employee integrity so that no decision can be influenced by personal considerations.
- ❖ pay their suppliers on the agreed due dates and conditions unless there are objective reasons not to do so.
- ❖ not place their own suppliers in a situation of economic dependence.
- ❖ cease working with a Production Partner who, repeatedly, fails to meet our expectations or who does not respect our ethical principles, particularly regarding human rights and/or the fight against corruption, or who has been reported for serious breaches of these commitments and who does not present an action plan to comply by taking appropriate corrective measures.
- ❖ strict compliance with anti-corruption, anti-money laundering, and anti-influence peddling rules towards all authorities, auditors, and other stakeholders, as well as the implementation of risk prevention programs related to these risks.

- The notion of **corruption** – whose legal definition varies according to the applicable law – generally encompasses all actions by which a person (the corrupted) solicits or accepts, for himself or for another, a gift, a promise or any advantage whatsoever with a view to performing, omitting to perform or delaying an action falling within his functions, missions or mandates for the benefit of a third party (the corrupter).

Gifts, promises or any advantages whatsoever may consist of direct benefits – payment of cash, in-kind goods, rebate, free performance of work – or indirect benefits – hiring a relative, payment of a debt on behalf of another.

Corruption can be carried out by a person in the context of private functions (private corruption) or public functions (public corruption). There is active corruption when the person who corrupts is at the initiative of the corruption. There is passive corruption when the act of corruption is at the initiative of the person who is corrupted.

The notion of **money laundering** refers to actions that facilitate, by any means, the false justification of the origin of the assets or income of the perpetrator of a crime or offense that provided him with a direct or indirect profit.

The notion of **influence peddling** applies when a person abuses their real or supposed influence in order to obtain from an authority or a public administration, for the benefit of a third party, distinctions, jobs, contracts, or any other favorable decision, in exchange for an advantage. Influence peddling is also qualified as active or passive depending on the person initiating the act.

The Group applies a "zero tolerance" policy regarding corruption, money laundering, and influence peddling.

- Suppliers must commit, in their own name and on behalf of their employees, to:
 - not solicit or offer illicit commissions, directly or indirectly,
 - not promise, offer, or accept any advantage that could influence the beneficiary's behavior.
 - not accept gifts and invitations unless they are of symbolic value representative of local customs. In Europe, this value can be considered below 50 euros.

- If a subcontracting request is made to Chantelle for reasons that the supplier must explain beforehand, the supplier must ensure that its subcontractor applies at least the provisions of this code of conduct, it being specified that only the CHANTELLE group will be able to expressly validate the use of known and ethically, socially, and environmentally supervised subcontracting.

3.4 COMMITMENTS OF OUR PARTNERS REGARDING ENVIRONMENTAL PRESERVATION

We ask our Production Partners to commit to:

- evaluate the impact of their activity on the environment.
- minimize this impact through process optimization using the best available techniques, particularly concerning energy, waste, and other sources of environmental impacts.
- strive, beyond complying with all applicable environmental laws, to mitigate the negative impact of production on the environment and climate, notably by reducing greenhouse gas emissions and pollutants, properly managing waste and chemicals, and conserving water.
- improve their environmental performance by meeting the requirements set forth by the CHANTELLE Group, which may go beyond national regulations and expectations.

IV. ALERT PROCEDURE

We strongly encourage transparency. Any concern can be raised with the contact person at Chantelle.

We ask our Production Partners to commit to:

- organize their own alert system or apply the Chantelle's alert system or any other equivalent system, to their employees or related parties,
- promote the alert procedure to their own production partners and
- verify its implementation by all means.

This point will be scrupulously taken into account in any audits Chantelle may conduct.

In addition, there is the possibility of submitting a formal report, notably by using our online reporting tool, accessible via a secure link. This channel is accessible to both internal staff members and external stakeholders, such as staff members of our production partners, and also staff members of their own suppliers.




<https://whistleblowersoftware.com/secure/9cc1b518-1bfb-4c05-9a6c-00395c28569e/channel-select>

This tool allows reports to be submitted in writing or through a voice recording system. The tool's homepage provides practical advice on how to use it. The whistleblower's identity will remain confidential unless they prefer to make an anonymous report.

Reports can be made to report behavior that violates the law or that violates our code of conduct or other company policies. Each report will be handled thoroughly, confidentially, and impartially.

If a supplier audit reveals a breach of the commitments made in this code and its proper application, measures proportionate to the seriousness of the breach may be decided by Chantelle's ethics committee.

The reporting procedure is described in detail in the Whistleblowing Policy

 Whistleblowing policy & privacy statement - Oct. 2024.pdf