

L'ORÉAL

Responsible Lobbying Policy

Integrity & Transparency are two of our Ethical Principles.

In line with its [Code of Ethics](#), L'ORÉAL has decided to set out its commitments with regards responsible lobbying and how they are implemented.

This Policy, approved by the Chief Executive Officer and the Executive Committee and presented to the Board of Directors, may be updated on a regular basis in a spirit of continuous progress.

1. SCOPE

L'ORÉAL, as a leader of the cosmetics industry, believes it is its duty to be proactive and take part in the public decision-making process in the countries where it operates.

This is how we ensure awareness of the Group's activities and interests while respecting the legitimacy of other stakeholder representatives and the interests that they represent.

« Lobbying » is defined as establishing and contributing to a dialogue with a public decision-maker in order to influence public policy.

2. PRINCIPLES FOR ACTION

- L'ORÉAL's responsible lobbying policy is applicable to all employees, officers, directors and members of the executive and management committees of the Group and its subsidiaries worldwide as well as to the employees and officers of the L'ORÉAL Foundation (hereinafter "Employees")
- The Country Manager, or for Corporate or Zone Employees, the member of the Group Executive Committee Member to whom they report, establishes a list of persons authorised to lobby and ensures they have the training and experience required to exercise such activity
- Employees authorised to lobby must ensure they are knowledgeable about the laws, codes of conduct and standards that may apply to this activity in the Countries where they operate and be registered in the existing lobbyists' registers, if any
- Employees authorised to lobby must inform their management should they encounter a real or potential conflict of interests situation that could influence or could be perceived as influencing the relationship between L'ORÉAL and public decision-makers involved in public policy

- We commit to respecting laws applicable to lobbying as well as applicable codes of conduct and standards. Whenever they impose higher standards than those set out in this policy, they should always apply. If, by contrast, this policy provides for a higher standard, it should prevail, unless this results in illegal activity
- We do not make any contributions to political parties, politicians or related institutions that collect political funds. Furthermore, we make sure our charity contributions and other philanthropic actions do not constitute “hidden” contributions
- We respect L'ORÉAL's corruption prevention policy, namely with regards to gifts and entertainment, in our relationship with public decision-makers
- We only communicate reliable, verifiable and up-to-date information and positions and in particular we abstain from communicating information that is deliberately biased or obtained through illegal means. We respect the independence of experts in order not to influence the integrity and objectivity of scientific opinions
- We regularly communicate on the structure, organisation and means allocated to lobbying at L'ORÉAL
- We make our main positions public
- We communicate the positions defined at Group level to our subsidiaries and ensure they are correctly understood and disseminated
- Whenever we use intermediaries, we communicate our responsible lobbying commitments to them and require them to respect them. In particular, they need to clearly disclose that they represent L'ORÉAL's interests
- We support the adoption of lobbying best practices, in particular within the professional associations of which we are members
- We reserve the right to express our dissent whenever we do not share the positions taken by these professional associations
- We abstain from recruiting former public decision-makers¹ before the end of applicable statutory periods or to retain active public decision-makers to represent our interests

¹ For example, members of parliament, ministers, senior members of ministry cabinets, representatives of regulatory bodies, etc...

3. IMPLEMENTATION

Within L'Oréal, responsible lobbying activities are organised as follows:

- the Executive Vice President Communications and Public Affairs, who is a member of the Executive Committee, to whom reports the Public Affairs teams within the Zones and Countries participating in elaborating positions, is in charge of defining the orientation of responsible lobbying
- the Senior Vice President for Group Institutional Affairs is the senior representative with regards public decision-makers and representative institutions and reports to the Chief Executive Officer

The Executive Vice President Communications and Public Affairs and the Senior Vice President for Group Institutional Affairs work in close contact with the Chief Executive Officer to prepare and coordinate contacts with public decision-makers.

Therefore, in cooperation and in their area, they are in charge of designing and defining the implementation of L'ORÉAL's Responsible Lobbying policy and for ensuring the deployment of and compliance with the requisite procedures.

The Country Managers, or for Corporate or Zone Employees, the member of the Group Executive Committee to whom they report, are responsible for the proper implementation of this programme and compliance therewith on a day-to-day basis.

In case of doubt, Employees may seek advice, at Country/Entity level, from their Public Affairs Manager or Legal Director and, at Group level, from the Executive Vice President Communications and Public Affairs or Senior Vice President for Group Institutional Affairs.

In the event of conduct or situations contrary to this policy, Employees may, in accordance with our Speak Up Policy, report this to a member of the Group Executive Committee, of a Group, Zone or Country Management Committee in their reporting line, or to their Ethics Correspondent. They may also ultimately contact the Chief Ethics Officer directly, via the L'ORÉAL SPEAK UP secured website: www.lorealsspeakup.com. Reports are handled in a timely manner and appropriate measures are taken regardless of the persons involved. No Employee may face retaliation for making a Speak Up report or participating in its handling.

