SUPPLIER CODE OF ETHICS

MNG–010
March 2026

A GREAT WORKING DAY.
DELIVERED.

Lyreco

Our commitments

Since its creation in 1926, Lyreco has been driven by the values of Excellence, Respect, Passion and Agility. These values are shared by all our employees, are our strength, and make us a trusted partner. For us, respecting these values is a matter of course, an obligation, a duty.

The principles of Integrity, Neutrality, Fair Play, Equity, Transparency and Compliance guide our conduct and decisions, at all times, with all our employees and partners, in all our activities and wherever we operate. These guiding principles are further reaffirmed in the Code of Ethics applicable in all Lyreco entities.

As part of this commitment, in this dedicated Suppliers Code of Ethics, we would like to reiterate that these are the minimum requirements that suppliers must comply with in terms of ethics and professional behaviour when working with Lyreco.

Our suppliers are obliged to respect the same ethical requirements and conduct business activities in accordance with this suppliers Code of Ethics, to implement the policies and procedures necessary to comply with applicable laws and regulations, and to ensure that these commitments are followed up with all partners.

Purpose of the Suppliers Code of Ethics

The Suppliers Code of Ethics is the prerequisite for any collaboration with Lyreco. Compliance with it is one of the key evaluation and reference criteria for Lyreco. The Supplier Code of Ethics is a requirement to any existing contracts.

Furthermore, it does not replace the laws and regulations in force in the various countries applicable to our suppliers. In the event of any contradiction between the applicable law and this Suppliers Code of Ethics, the most restrictive provision will apply.

Our suppliers must read and ensure that it is fully respected and that the requirements are fulfilled. We expect our suppliers to independently assess the risk of violations of this Supplier Code of Ethics. It is by sharing the same commitments that we can, together, advance ethics in business and guarantee «A Great Working Day» for all.

Compliance with laws and regulations

Our suppliers must, under all circumstances, comply with the laws and regulations in force, whether international, European and/or local, whatever the activities, products, services are and wherever operating. Our suppliers also need to ensure third party suppliers, partners and sub-contractors including entire value chain used by the supplier in connection with the manufacture of products to comply with the same. Lyreco does not tolerate any practice to the contrary.

Human rights

As a signatory of the United Nations Global Compact since 2004, Lyreco is committed to supporting human rights and promoting a socially responsible attitude, in line with the principles of the Global Compact, but also with the International Labour Organisation (ILO) Conventions, the United Nations Convention on the Rights of the Child and the OECD Guidelines for Multinational Enterprises.

Our suppliers are also required to treat everyone with dignity and respect, promote diversity and equal opportunities, and build an ethical and inclusive culture. In particular, our suppliers must undertake to combat all forms of forced or compulsory labour, the use of child labour, discrimination in employment or occupation, and refrain from using partners who apply or encourage such practices.

Forced Labour

Suppliers shall not use, or support forced labor, whether in the form of prison labour, indentured labour, bonded labour, or otherwise. Suppliers must allow employees to keep their own identification documents and to resign from their positions at any time. Suppliers shall not withhold salary, benefits, property or documents to force employees to continue work.

Employees will be given the right to leave premises after their workday and the right to end employment. Suppliers will not use nor support human trafficking.

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Reference ILO Conv. 29 & ILO Conv. 105

Child Labour

Suppliers shall not use nor support child labour. Suppliers shall not employ people younger than 15, or the minimum age for the completion of compulsory education, or the minimum age of employment required by law in the country of manufacture, whichever is highest. Suppliers must establish and maintain written policies and procedures for remediation of child labourers and shall provide adequate financial and other support to enable such children to attend school.

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Reference ILO Conv. 138, ILO Conv. 182 & ILO Rec. 146

Young employees

All legal limitations on the employment of persons below the age of 18 years must be followed. We acknowledge that according to the UN Convention on the Rights of the Child, a person is a child until the age of 18. We recognize the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

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Working conditions

Our suppliers shall provide a working environment that complies with applicable legislation, is healthy and safe, free from any form of intimidation, harassment or discrimination, and promotes social dialogue.

Compliance with social laws and regulations

Minimum age and respect for privacy: Our suppliers are required to comply with the social laws and regulations applicable in each of the countries in which they operate, in particular with regard to minimum age and respect for privacy.

Working hours, Wages and Benefits: Suppliers shall not require employees to work more than 48 hours a week, or the maximum number of work hours per week permitted in the applicable country of manufacture, whichever is less, except in extraordinary business circumstances and in agreement with the employee. Suppliers shall grant employees at least one day off in every seven-day period.

Suppliers shall pay employees at least the minimum wage required by applicable laws and regulations, or the prevailing industry wage if no minimum wage law applies and shall provide legally mandated benefits. In addition to their compensation for regular hours of work, Suppliers shall compensate employees for overtime hours at the applicable premium rate in their country. In countries that have not established premium overtime rates, Suppliers shall not pay employees less than their regular hourly rate for overtime hours.

The supplier should strive to secure living wages based on local conditions.

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Reference ILO Conv. 1, ILO Conv. 14, ILO Conv. 26, ILO Conv. 30, ILO Conv. 95, ILO Conv. 131 & ILO Rec. 116

Working conditions

Health and safety at work

Our suppliers are required to provide a safe and healthy working environment at all sites where they operate. This commitment must include the strictest compliance with the laws, regulations and standards in force with regard to health and safety at work, training and awareness-raising for all employees, and the implementation of all necessary measures to prevent and combat occupational accidents and diseases.

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Reference ILO Conv. 155, ILO Conv. 174, ILO Conv. 184 & ILO Rec. 164

Non-harassment and non-discrimination

Suppliers shall treat every employee with respect and dignity, and shall not subject any employee to physical, sexual, psychological, verbal, or other harassment or abuse.

Suppliers shall not subject any person to discrimination in employment (including hiring, salary, benefits, advancement, discipline, termination, or retirement) on the basis of gender, marital status, race, religion, age, disability, sexual orientation, nationality, political opinion, social or ethnic origin or any other condition that could give rise to discrimination.

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Reference ILO Conv. 100, ILO Conv. 111,
ILO Conv. 143, ILO Conv. 169, ILO Conv. 183, ILO Conv. 190, ILO Conv. 206 & ILO Rec. 206

Freedom of association and collective bargaining

Suppliers are required to recognize and respect the right of workers to exercise their freedom of association, including the right to join or not join any trade union organization of their choice, and to bargain collectively.

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Reference ILO Conv. 87, ILO Conv. 98, ILO Conv. 135 & ILO Conv. 154

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Environment and sustainable development

At Lyreco, it is the responsibility of all employees to take into account respect for the environment and sustainable development in their daily activities.

We are aware that taking action to protect our planet and reduce our environmental footprint requires the commitment of everyone.

This is why we make sure that we work with suppliers who, at a minimum, comply with the relevant laws and regulations wherever they operate,

but above all, who share our concerns and commitment to ever more sustainable and responsible practices, products and solutions, and who offer innovation and continuous improvement programs.

Quality of products and services

Lyreco rigorously ensures that all products and services offered to its customers meet the highest standards in terms of quality and safety.

We require our suppliers to share the same ambitions for excellent products and services, to strictly comply with applicable laws and regulations, to immediately report any issues regarding the quality and safety of their products and services and to implement all appropriate corrective, palliative or alternative measures in consultation with Lyreco.

For products containing animal-derived materials, suppliers shall not tolerate any cruelty or animal neglect. Suppliers will take into consideration the five animal freedoms, as defined by The World Organisation for Animal Health.

Business integrity

Our suppliers must act with integrity on a daily basis and take the necessary steps to eliminate contrary behaviour in order to build and maintain transparency and trust in all business relationships our suppliers maintain with third parties.

Corruption and influence peddling

Lyreco has adopted a zero-tolerance policy with regard to corruption and influence peddling and expects the same level of requirements from its suppliers.

Suppliers are prohibited from directly or indirectly granting, offering, promising or asking for a sum of money or any other object of value to a public official or an employee of a private company, including a Lyreco employee, for the purpose of exercising improper influence or obtaining an undue advantage. This prohibition also applies to facilitation payments.

Our suppliers are required to strictly comply with applicable anti-corruption regulations and to carry out all reasonable due diligence to detect and prevent any act of corruption and influence peddling in all business relationships our suppliers maintain with third parties.

Fraud

Our suppliers must not seek to gain any advantage by using fraudulent practices or by allowing anyone else to do so.

Our suppliers are obliged to keep accurate accounts, without ever modifying the data entered in order to conceal or distort the amount of the transactions recorded.

Fair Competition

Our suppliers must comply with all applicable competition laws and regulations and must refrain from any practice that restricts, distorts or prevents free competition.

Conflicts of Interest

Our suppliers are required to avoid any conflict of interest or any situation that could give the appearance of a conflict of interest in the course of the business relationships with Lyreco. Our suppliers are also required to inform Lyreco when a situation could lead to a conflict of interest with Lyreco.

Gifts and invitations

Lyreco has adopted a strict policy regarding gifts and invitations considering the risk of inappropriate influence.

We therefore ask our suppliers to refrain from offering or accepting, in particular in the context of business relationships with Lyreco, any form of solicitation, gift or invitation aimed at influencing the behaviour or decision of the recipient. Prior to any offer or acceptance, our suppliers must ensure that gifts and invitations do not violate the recipient's internal rules and policies or relevant laws and regulations.

Environmental Claims

Any environmental claims made by suppliers must follow these principles:

- Claims must be truthful and accurate.
- Claims must be clear and unambiguous.
- Claims must not omit or hide important relevant information.
- Comparisons must be fair and meaningful.
- Claims must consider the full life cycle of the product or service.
- Claims must be substantiated.

Confidentiality and data protection

Lyreco is committed to processing and protecting sensitive information about its business partners, whether confidential information or personal data, in accordance with applicable regulations, Lyreco's internal policy and any contractual commitments.

Our suppliers have a duty to take all necessary measures to ensure adequate treatment and protection of information and data acquired in the context of the business relationship with Lyreco, especially when it concerns confidential or personal information and data. Our suppliers are prohibited from using such information and data outside the framework for which it was provided, nor from disclosing it to any third party, without having obtained the prior written approval of the owner of the information or data.

Suppliers must protect all such information and data from unauthorised access, destruction, misuse, alteration and disclosure, using appropriate physical and electronic security procedures and comply with data protection legislation.

Suppliers must promptly report any actual or suspected data leakage, data breach, or unauthorized disclosure of information. This includes any situation where personal, confidential, or sensitive company data may have been accessed, shared, lost, or exposed without proper authorization.

International exchanges

Our suppliers must comply with applicable international restrictions and sanctions, as well as laws and regulations relating to the import and export of the products or services they provide. In particular, they must take all necessary steps to avoid exposing them, or Lyreco, to sanctions by a national or international authority.

Verification and audit

Lyreco reserves the right, directly or through an external company or organisation mandated by Lyreco, to check performance with the provisions of this Suppliers Code of Ethics and to conduct compliance audits. Our suppliers will provide the necessary information and documentation upon request.

Non-compliance with the Suppliers Code of Ethics

If Lyreco considers that its suppliers do not comply with the requirements of this Suppliers Code of Ethics, the suppliers shall immediately implement the necessary corrective, palliative or alternative measures, in consultation with Lyreco, or even Lyreco may suspend or terminate its relationship with the suppliers, without prejudice to any other right or recourse that Lyreco may have.

Our aim is to prevent and detect any ethical violations so that Lyreco can take appropriate action and remedy the situation.

If a supplier observes any behaviour or situation in the context of its business relationship with Lyreco that is contrary to the ethical principles defined by Lyreco, it may report it, in good faith, to a Lyreco contact person or via the “Raise your concern” whistleblowing system accessible on the Lyreco corporate website or directly at the address above.

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