



ETHICS CHARTER



RÉMY COINTREAU

Terroir, people and time

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INTRODUCTION

Our values at the heart of our Ethics Charter

Rémy Cointreau has always been a values-based organization. Our values “Terroir, People, and Time” are an integral part of our DNA, leading us to adopt an ethical behavior in all our professional activities. Every day, the Maisons of the Group undertake to respect and promote our values for a sustainable growth. Crafting exceptional spirits also implies and imposes a high sense of responsibility, driven and transmitted by all Rémy Cointreau employees.

In the following sections of this Ethics Charter, the Group aims to provide clarity and guidance to empower our teams and make sure they can easily embrace an ethical behaviour in their daily professional life.

We believe that respect for these values drives our business model and the trust of our stakeholders. For this purpose, we ask you to work ethically, with integrity and to embody this Ethical Charter on your work-related activities to achieve our sustainable growth objectives.



Marie-Amélie de Leusse
Chairwoman of the Board



Franck Marilly
Group Chief Executive Officer

- **What is our Ethics Charter ?**

Built on our core values, our Ethics Charter provides greater detail about expected behaviors and drives our culture of ethics and accountability. This Charter presents guidelines explaining what is expected while conducting our business activities. It starts with a simple principle—we shall always act with integrity. Besides being the right thing to do and protecting Rémy Cointreau, acting with integrity and in compliance with laws improves our performance, protects our businesses in the long run and enables us to attract and retain talent.

The Ethics Charter reaffirms the commitment of Rémy Cointreau to respect ethical rules in line with international principles and standards such as: the European Union Charter of Fundamental Rights; the OECD's guiding principles; the Universal Declaration of Human Rights; the International Labour Organization's Charter of Fundamental Rights; the 17 Sustainable Development Goals of the United Nations; the 10 Principles of the UN Global Compact to which Rémy Cointreau has subscribed since 2003 and the OECD's Convention on Combating Bribery of Public Officials.

The present Ethics Charter does not replace national and international laws and regulations that apply to the Group's activities.

- **Who is concerned by this Charter?**

Our Ethics Charter applies to all Rémy Cointreau employees across all levels (including trainees, directors, and Executive Committee Members) in every country and every Rémy Cointreau Group entity. These rules apply to all of us, and we expect the same high standards from our business partners (third party distributors, wholesalers, consultants, agents and suppliers) as well when acting on Rémy Cointreau's behalf.



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- **Why comply with our Charter?**

Each Rémy Cointreau employee has a responsibility to act ethically and comply with applicable laws, this Ethics Charter, and Rémy Cointreau policies.

This Charter shall be considered as a minimum requirement that we should follow, unless this leads to a violation of a local law. We strive to uphold a culture of ethics within the Group, and we rely on all employees worldwide to help us conduct our business in an exemplary manner. Each employee shall be an ambassador of these virtuous professional practices.

Continuous improvement and corrective actions are an integral part of the compliance programme. By applying this Charter, you contribute to the continuity and success of Rémy Cointreau.

- **Rémy Cointreau's Ethics Committee**

Rémy Cointreau has entrusted the observance of this Ethics Charter to an Ethics Committee composed of 5 members from the following departments: Human Resources, CSR, Legal, Audit, and Ethics & Compliance.

Our Ethics Committee can deal with any ethical matters that might merit its attention and may take any action that it deems necessary to foster the development of a culture of integrity within the Group. This Committee meets periodically and whenever a situation requires it.

For more information, please contact us at: ethics.committee@remy-cointreau.com.



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Rémy Cointreau Values

People are at the heart of our Maisons
Their knowledge, transmission, and energy
Family & care

“Terroir, People & Time”

Terroirs matter & need to be taken care of
From Rémy Martin, Telmont or Metaxa’s Samos vineyards, to Islay or Isère cereals, Mount Gay sugar cane, or Cointreau oranges....

Time is of the essence
Ageing spirits
Transmission over centuries



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TERROIR

Preserving our terroirs

1. Environment
2. Responsible Purchasing



RÉMY COINTREAU

Terroir, people and time



1. ENVIRONMENT

At Rémy Cointreau, we are proud to stand as the guardians of our multi-century Maisons, passing our know-how, terroirs, and vision to the next generations. Our family company has been planning our next century, for centuries. For this reason, sustainability is not just a concept for us, it is rooted in our daily actions.

Corporate, Social & Environmental Responsibility (CSR) is one of the 4 pillars of the Group's strategic roadmap. Thus, it must fully contribute to its value creation, while relying on its structural commitment to the Global Compact, of which the Group has been a member since 2003.

The roadmap for its sustainable transformation is named "Sustainable Exception". It is based on the Group's three main values – Preserving our Terroirs, Acting for our People and Communities, and Committing through Time.

The key features of the "Sustainable Exception" plan are ecological agriculture in all terroirs involved in crafting the Group's spirits, the use of renewable energies for production sites, eco-design for all brand packaging, and a gradual reduction in carbon emissions aligned with the international ambition of "Net Zero Carbon" by 2050.

As such, we expect all our employees to support and uphold our environmental commitments.

I work with design agencies who tell me we cannot compromise on packaging aesthetics, but I know there are reusable alternatives we can leverage. What should I prioritize?

You shall discuss with your team, recognizing the challenge of using sustainable packaging while maintaining brand prestige. By presenting examples of premium yet eco-friendly packaging solutions you support the Group's environmental objectives. Reducing packaging materials and their eco-design is one of our biggest challenges, in order to reduce the Group's carbon footprint.





2. RESPONSIBLE PURCHASING

Rémy Cointreau has implemented a responsible purchasing programme in compliance with its CSR strategy. With our suppliers, we commit to sustainable procurement procedures and practices.

As such, we strive to:

- build long-term and fair relationships with suppliers, based on the principle of integrity ;
- put responsible supply chains in place ;
- help our suppliers to improve their CSR performance ;
- create sustainable added value & foster innovation.

We require our suppliers to sign our Supplier Code of Conduct and to ensure compliance with all its applicable principles in their own operations. They are required to adopt the principles of responsible supply chains in an environmentally responsible manner and with respect of human rights. We favour suppliers conceiving sustainable product development when feasible.

I recently visited sites of key suppliers and I am concerned about their environmental practices. What should I do?

Raise your concern with your local procurement team. The Group has developed a Responsible Purchasing Charter to monitor the environmental and social practices of our suppliers in order to ensure a sustainable supply chain.

-
-  Purchasing Ethics Charter
 - Responsible Procurement policy
 - Group Purchasing procedure
 - Supplier Code of Conduct



PEOPLE

Acting for our People & Communities

3. Responsible consumption
4. Health, Safety & Quality
5. Diversity, Equity, Inclusion
6. Anti-Harassment
7. Human rights
8. Data Privacy
9. Responsible use of technology
10. Conflict of Interest
11. Transmission of savoir-faire and excellence



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3. RESPONSIBLE CONSUMPTION

Rémy Cointreau has been pursuing a value strategy, promoting the high end positioning of its exceptional wines and spirits. In that context, advocating for responsible consumption has been part of the Group and its brands' DNA.

However, the Group recognizes that alcohol can be abused and that its inappropriate consumption can cause serious health problems for consumers. As such, the Group fully supports the World Health Organisation objective of reducing harmful alcohol consumption worldwide by 10% by 2025. For this reason, the Group wants to empower all stakeholders so that they understand the risks of harmful drinking, including excessive drinking, drinking & driving, drinking during pregnancy, and underage drinking.

Rémy Cointreau has also developed a responsible consumption ritual called R.E.S.P.E.C.T, each letter representing an action to follow. All employees are trained and strongly encouraged to apply this ritual, but also to share and promote it with their business partners, friends and family. All employees are invited to be ambassadors for responsible drinking. Alcohol consumption is never to be considered a requirement for the successful execution of one's professional duties.

I'm at the company's Christmas party and a colleague seems to drink excessively, should I react?

Yes! Encourage your co-worker to stop drinking and instead drink water and eat something as explained in the responsible drinking guidelines.

 [Responsible drinking guidelines](#)





4. HEALTH, SAFETY & QUALITY

4.1 Health & Safety at Work

Rémy Cointreau undertakes to provide a safe and healthy working environment to all employees in the framework of its activities.

There is no compromise when it comes to safety. We care about each other's working conditions and well-being; we create conditions in which we are free from harm, and limit the risk of any form of work accident or occupational illness.

As such:

- We protect the physical and mental health of our employees, whether they are working from home, at the office or travelling for work;
- We respect the balance between professional and personal life;
- We provide the right equipment and services to ensure a safe and secure environment;
- We ensure the safety and security of our business partners and visitors while on our premises;
- We respect applicable health, safety, security, and environmental laws and policies that apply to our activities.

As a Marketing Manager, I am going through a personally challenging period, experiencing sleeplessness and high anxiety, impacting my ability to focus on a large upcoming campaign. What should I do ?

If you feel overwhelmed, you should talk to your manager. Rémy Cointreau prioritizes the well-being of its employees and your manager will offer support without judgment. The Group has an employee assistance program to help you get through difficult times.

 [Health, Safety & Quality policy](#)





4. HEALTH, SAFETY & QUALITY

4.2 Product, Safety & Quality

At Rémy Cointreau, we are committed to product safety and quality. Rémy Cointreau's purpose is to deliver a great experience to its client, ensuring its products are safe and respect international standards regarding food safety and quality conception.

Product safety and quality must always be paramount considerations when designing, manufacturing, stocking, marketing, and selling our products.

As such:

- We design our products to be safe over time;
- We design working processes to prevent safety risks for our consumers;
- We monitor our working systems to maintain the highest quality standards and to prevent food safety issues;
- We train our employees on our internal procedures regarding product safety and quality standards.

I have a safety problem on my production line. I'm afraid that reporting it will slow down production. What should I do ?

Safety is our utmost priority. If a potential safety problem arises on the production line, you must report it immediately. Addressing potential safety hazards promptly is crucial, regardless of potential impacts on production deadlines or business opportunities.

 [Health, Safety & Quality policy](#)





5. DIVERSITY, EQUITY & INCLUSION

At Rémy Cointreau, we aim to build a diverse and inclusive workplace in which everyone is fairly treated. Diversity, equity, and inclusion favors greater creativity, and helps establish an inclusive culture of mutual support.

Our Group's commitments:

- We promote our principle of an inclusive work environment where mutual respect and understanding between people with different personal situations or backgrounds are strengthened;
- We strive to recruit and integrate employees from all backgrounds;
- We prohibit all forms of discrimination, i.e. when an applicant or employee is treated less favorably in the workplace because of personal characteristics (such as race, color, social or ethnic origin, citizenship status, religion, political or philosophical opinion, gender, sexual orientation, pregnancy, maternity, marital or family status, age, physical or mental disability or any other status protected by law).

One of my team members has informed me of his disability. How should I react?

Firstly, you should thank him for sharing this information with you and inform him that this topic will be treated with confidentiality and respect. Then, please contact the Human Resources department to find out about the support and accommodations available for employees with disabilities.

 Diversity, Equity & Inclusion policy





6. ANTI-HARASSMENT

At Rémy Cointreau, we make sure that everyone is treated with respect and dignity. We treat our colleagues and business partners in a courteous and respectful manner.

Rémy Cointreau does not tolerate any treatment that creates an intimidating, hostile, or offensive work environment, or any inappropriate behaviors that interfere with work performance. Disrespectful behavior or harassment of any kind (psychological or sexual) is banned from our workplace. What matters when evaluating disrespectful behavior or harassment is how the behavior is received by the impacted individual, whether it was intentional or not.

Rémy Cointreau treats with the utmost seriousness behaviors that are reasonably perceived as disrespectful or harassing and ensures that adequate measures are taken.

My colleague is sometimes quite intimidating, speaks in a harsh and condescending tone, denigrates my work and often makes unreasonable requests. What should I do?

Rémy Cointreau ensures respect and dignity for all. If you consider that your colleague treats you with disrespect this could be considered as harassment under certain conditions. You can contact the Human Resources department for advice, or directly report this situation through our Ethics Line.





7. HUMAN RIGHTS

At Rémy Cointreau, wherever we operate, we respect all internationally recognized human rights and fundamental freedoms, including notably, the rights to life and safety, to non-discrimination, to a decent job, to freedom of expression, to health, and to privacy protection.

We respect human rights, by developing our positive impact where we can and mitigating the negative impact resulting from our activities.

As such:

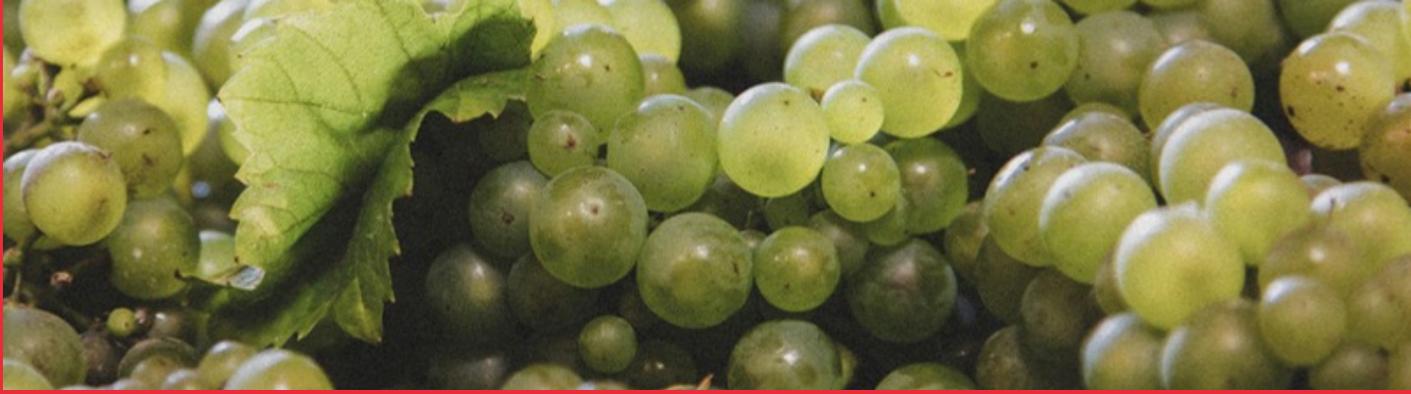
- We provide our employees with fair pay and social benefits to ensure they enjoy a decent standard of living;
- We ensure a respectful environment for everyone;
- We stand against forced labour practices, child labour, and any form of discrimination;
- We support and respect human rights in our operations and with our business partners in a manner consistent with our Responsible Purchasing Charter;
- We encourage our stakeholders to report any human rights issues they may encounter as a result of our activities, through various grievance mechanisms, and in particular through our Ethics Line.

I suspect one of our suppliers is employing persons under the legal working age. I know that our contract with this supplier will not be reviewed until next year. What should I do ?

You should report this information without delay to your manager or through the Rémy Cointreau Ethics Line.

 [Human rights policy](#)





8. DATA PRIVACY

At Rémy Cointreau, we recognize the right to privacy and to personal data protection as a fundamental right.

We have set up a comprehensive privacy programme to comply with applicable data privacy laws and to ensure the security of the personal data of our employees, clients, and other business partners. As such:

- We process personal data lawfully, fairly and in a transparent manner;
- We only collect personal data that is strictly necessary for our activities;
- We implement data retention rules;
- We pay particular attention to sensitive information;
- We maintain appropriate security measures to protect personal data that we hold;
- We train regularly our employees.

In case of doubt about the processing of your personal data, you can read the appropriate privacy policy or contact the Data Protection Officer : privacy@remy-cointreau.com

I have received an email sent by error, containing information about salaries of other team members. What should I do?

You should contact immediately your local Data Protection Officer or the Chief Information Security Officer to report this incident. You should also avoid reading and using this information.

 [Privacy Policy](#)





9. RESPONSIBLE USE OF TECHNOLOGY

At Rémy Cointreau, we ensure that Artificial intelligence (AI) systems used within our Group are built to provide a helpful, safe, and trustworthy experience for everyone. This is why we implement technology using responsible AI practices. The principles below describe the foundation of our AI projects across the Group:

- **Reliability and safety:** AI systems are developed in a way that is consistent with our values. We implement AI systems aiming for continuous improvement toward safe, fair and reliable systems.
- **Privacy and security:** with an increased reliance on data to develop and train AI systems, we've established rules to ensure that data is not leaked or disclosed.
- **Transparency:** we are transparent about AI systems developed within the Group to make sure everyone understand the behavior of AI systems and the limitations of the system.

I have recently discovered that a colleague in the Marketing department has been using an AI tool to analyze consumer behavior and preferences without obtaining the necessary approvals. What should I do ?

You should contact your manager to report this incident. To avoid AI risks, we have created a dedicated AI tool called "My Companion" that is compliant with our guidelines on responsible AI use.

 [Generative AI policy](#)





10. CONFLICT OF INTEREST

At Rémy Cointreau, we expect that all employees and stakeholders act in the interest of the Group and disclose potential conflicts of interest.

A conflict of interest occurs when an employee is in a situation where their private interests are likely to interfere with those of Rémy Cointreau.

The risk of a conflict of interest is, by nature, inherent in the life of any business. It is each employee's duty to assess and determine whether their independence, impartiality and objectivity are likely to be influenced and to comply with the existing procedure.

By way of examples, the following situations illustrate cases of conflict of interest:

- An employee is friends with a business partner who participates in a call for tenders for which the employee is solely in charge;
- An employee does other work that restricts their ability to work for Rémy Cointreau;
- An employee has a seat on the board of directors of a Rémy Cointreau supplier;
- An employee receives a personal or financial benefit from a supplier, customer or competitor.

My husband works for a competitor. What should I do?

If you discuss together any business information such as pricing or business opportunities, you disclose confidential information and violate competition laws. This is a sensitive situation that needs to be communicated in writing to your line manager by completing a Conflict of Interest Statement Form.

 [Conflict of Interest Prevention policy](#)





11. TRANSMISSION OF SAVOIR-FAIRE & EXCELLENCE

The Rémy Cointreau Group implements training and apprenticeship initiatives to preserve the techniques developed in a business or prevent the loss of know-how.

Likewise, the Rémy Cointreau Foundation's mission is to support, in France and abroad, initiatives of general interest to showcase and convey invaluable savoir-faire and expertise.

The main objective of the Foundation is to establish a proximity with exceptional artisans it accompanies, aiming for results-oriented, tangible support.

The Foundation also acts in favor of terroir in its cultural, human, and environmental expression.

The 4 commitments of the Foundation:

- Valorization of exceptional savoir-faire
- Transmission for continuity
- Diffusion : know-how and how to know
- Skill-based sponsorship



[Link to the Rémy Cointreau Foundation](#)



TIME

Committing over time

- 12. Fight against corruption
- 13. Fraud prevention
- 14. International Trade Restrictions /
Combatting Money Laundering
- 15. Fair competition
- 16. Confidential information
- 17. Responsible Communication
- 18. Lobbying/ Political Involvement
- 19. Protecting our assets



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12. FIGHT AGAINST CORRUPTION

In order to conduct our business with integrity, the Rémy Cointreau Group has a zero-tolerance policy with regards to corruption. We will always choose to lose new business opportunities rather than secure it through a bribe, kickback, or improper payment.

Rémy Cointreau has implemented an anti-corruption programme to prevent risks of corruption including a Code of Conduct, internal policies and compulsory trainings.

The Code of conduct clarifies the types of conduct that constitute corruption and influence peddling while providing rules applicable to all employees on various topics (eg : rules applicable to Gifts and Hospitality, Donations and Sponsorships, Third party due diligence, etc).

Employees must adhere to the principles mentioned in this Code of Conduct. Employees shall never offer or accept payments, incentives, or anything else intended to improperly influence a business decision.

I am in the process of selecting new distributors since the contract with the last one is nearing its end. I decide to initiate a tendering process, inviting three different distributors to submit their bids. One of the bidding distributors wants to offer me a luxury watch during the tendering process. What should I do ?

You should politely decline the gift, explaining that according to Rémy Cointreau's Gifts & Hospitality policy, you are not permitted to accept such gift.

 [Code of Conduct](#)





13. FRAUD PREVENTION

Fraud is a serious offense with significant financial and reputational consequences for the Group. Rémy Cointreau is committed to protecting the Group and its stakeholders by preventing fraud.

Rémy Cointreau recognizes a wide range of fraud risks. Some are due to employees, such as stealing assets (goods or money), manipulating expense claims, or misstating of financial statements. Some are due to outsiders such as payments with stolen credit cards or cyberattacks. As such Rémy Cointreau implements preventive measures through actions to permanently improve processes at the Group and local levels, to safeguard Group's integrity.

Employees are expected to act with the utmost honesty and integrity towards the Group, its customers, and suppliers. Anyone who suspects or witnesses fraudulent activity should report it immediately to their manager or the Ethics Line.

A supplier contacted me via email requesting to change their bank details for future payments. The email mentions that the change is urgent due to a system upgrade at their current bank. What should I do ?

You should verify the authenticity of the request before acting on it. Always refer to the registered supplier database, and call the supplier using the phone number listed in your official records, not the one provided in the email. Follow internal procedure by reporting the request to your Finance department for handling supplier bank change details and ensure that any changes are confirmed through multiple verification steps.

 **Anti-fraud policy**





14. INTERNATIONAL TRADE RESTRICTIONS & COMBATTING MONEY LAUNDERING

14.1 International Trade Restrictions

Rémy Cointreau is committed to comply with regulations regarding international trade restrictions such as economic sanctions and embargoes in countries where we operate. Trade sanctions regimes are complex and are evolving constantly. International trade restrictions limit doing business with:

- Countries that support terrorism or the development of weapons of mass destruction, or commit human rights violations or oppress their people;
- Organizations and individuals who try to obtain products or services on behalf of such countries, or who are engaged in terrorism, money laundering, international drug trafficking, and other misconducts of global significance.

Before importing or exporting any goods, we must ensure that the transaction does not violate any international sanctions. To that end, we vet business opportunities through our due diligence platform.

14.2 Combatting Money Laundering

Money laundering is an illegal activity that makes large amounts of money generated by criminal activity (financial fraud, terrorism, drug trafficking, tax fraud, corruption, etc.) appear to have come from a legitimate source.

Rémy Cointreau has processes in place to prevent money laundering. However, if a transaction seems suspicious or inappropriate, employees shall ask for guidance to their Manager or the Compliance department.

On the last invoice, one of our suppliers requested that payments be made in several transfers to different accounts. What should I do?

The Group asks its employees to pay attention to transactions that appear suspicious. The split payment request should catch your attention and be considered as a red flag. Before going any further, consult your manager for advice.





15. FAIR COMPETITION

Rémy Cointreau is committed to operate in all our markets in compliance with competition and antitrust regulations.

A fair competition guarantees a healthy market and promotes long-term innovation. To the contrary, any unfair competition behavior or antitrust agreement could have a strong negative impact on our position and image as a Group. That is why compliance with competition law has always been a guiding principle underlying our actions when making commercial decisions, in order to protect our activities.

We do not tolerate any agreements or practices which could obstruct competition, such as:

- Prohibited agreements and practices: price fixing, clients, territories, or markets allocations and boycotts, etc.
- Abuse of a dominant position.
- Exchange of confidential information: we do not discuss, provide to, or exchange with a competitor or any other third parties (clients, suppliers) confidential information such as prices, terms of sale, costs, margins, or other item that may restrain competition.

At an event a competitor shares with me that their Group is about to increase their price in the coming months and asked me directly what are our plans. What should I do?

Competitors should not share information about their future pricing plans. You should immediately tell your counterpart that the question is inappropriate and contact your legal department for any further advice.

 [Antitrust policy](#)





16. CONFIDENTIAL INFORMATION

Confidential information shall mean any information communicated by a party to another party, whether orally or in writing, that is designated as confidential, or that reasonably should be understood to be confidential given the nature of the information and the circumstances of disclosure. As a general rule, information is considered confidential if its disclosure could be harmful for Rémy Cointreau.

The following types of information could be considered as confidential information: results, prices, customer file, information subject to a non-disclosure agreement, business secrets, technical R&D data, wages, etc. Within the Group and in the performance of our contracts, we strive to protect confidential data. All employees shall protect the confidentiality of Rémy Cointreau's strategic information and ensure not to disclose confidential information.

Likewise, insider information is confidential information which, if made public, might impact the company's share price. Employees shall protect the secrecy of insider or privileged information to which they may have access and never use it for their own advantage (or that of family and friends) or investments.

I am traveling with a colleague to an off-site location. Is it appropriate to speak publicly about a current business project?

You can talk about work but should ensure that your conversation is not overheard. You should not mention the name of the Group, any client, or business partner names where they can be overheard. Take extra care when participating in phone calls in public spaces or using your laptop when people can look over your shoulder.

 IT security policy
Insider Trading policy





17. RESPONSIBLE COMMUNICATION

Transparency and integrity are key when communicating with third parties (like medias, social networks, investors, analysts, and public authorities) about the Rémy Cointreau Group, its strategy, brands, and products.

Since Rémy Cointreau is a listed company, when communicating, we ensure that our communications are compliant so that:

- advertisement and commercial communications on all medias are sincere, true, non-misleading, and decent;
- we respect all applicable laws and regulations related to communication on spirits, advertising and usage of third-party assets (copyrights, rights of individuals such as name and image etc.);
- they are aligned with our internal processes, shared with all Group employees.

Regarding our financial communication, only a limited number of employees are authorised to disclose information to the financial markets. We ensure that our shareholders and investors receive reliable and transparent financial communication to maintain their trust in the long run.



Group Communication Guidelines
Social Media Guidelines



18. LOBBYING

The Rémy Cointreau Group does not authorize the financing of political activities and prohibits political involvement of any kind on the Group's behalf. However, as a key actor in the spirits industry, we are engaged in lobbying activities in countries where we operate.

A lobbying activity may be considered as any oral or written communication with a public official with the aim of informing and/or influencing a decision to be made. This definition may vary depending on the rules applicable in each jurisdiction. For example, situations described below can be considered as lobbying activities:

- Making contact with a member of parliament or a government employee to discuss and attempt to influence the passing, adoption, or introduction of a standard, an act, or a regulation;
- Making contact with a committee responsible for defining rules or tariffs.

Within Rémy Cointreau, lobbying activities are carried out through federations or organizations that represent the Group's business sector and by the Group's Public Affairs department.

We employ full-time professionals or external consultants to work on lobbying activities. Our lobbying activities are conducted in line with our CSR policy and in accordance with local laws and regulations, general principles defined in our Lobbying policy, and our Code of Conduct which includes rules prohibiting any attempt to bribe public officials.

My husband is engaged in a political party. He asked me if I could help by distributing flyers and if Rémy Cointreau could financially support part of his campaign fees. Is it authorized ?

During your free time, you can support your husband's political activities as long as you make it clear that you do not refer to Rémy Cointreau nor use financial and material resources of the Group (paper, printer, email, etc.). Keep in mind that employees engaging in personal political activities must do so as private citizens and not during paid work hours.





19. PROTECTING OUR ASSETS

Rémy Cointreau has a duty to maintain the security and integrity of the Group's assets. Our assets include everything that our Group owns or uses to conduct business. It includes notably:

- Physical assets, such as products and inventory, phones, computers, office supplies, equipment and furnishings;
- Immaterial assets, such as trademarks and designs;
- Technology assets, such as our email and voicemail systems, internet access, networks, hardware and software;
- Financial assets, such as cash, bank accounts, stocks and credit standing;
- Confidential information.

Assets are made available in order for you to do your job. Occasional personal use of assets such as telephones, computers, e-mail and the Internet is permitted, but please make sure that your use does not interfere with work or violate our policies or the law.

Confidential information and intellectual property represent the result of a major investment by the Group. Copyrights, trademarks, business plans, databases, price lists or customer lists: when you help protect these assets, you protect our competitive edge.

Each one of us is entrusted with the care of these assets. We ask our employees to be proactive in protecting them against loss, damage, theft, waste and misuse.

I noticed that a colleague seems anxious. Upon asking, he confides in me that he has lost his professional cell phone, which contains sensitive Group information. What should I do ?

You should encourage your colleague to report this incident immediately to the IT department. Ignoring this incident could lead to greater risks for the Group such as data breaches or extensive asset loss.



ADHERENCE TO THE CHARTER

20. Ethics line

- Making decisions
- Disciplinary measures
- Contact



RÉMY COINTREAU

Terroir, people and time



20. ETHICS LINE: *How to raise a concern?*

Rémy Cointreau has implemented the Ethics Line to encourage employees and external stakeholders to report any breach or misconduct that they observe or may be aware of in the framework of their professional activities.

You can use the Ethics Line, if you are a victim or if you observe behaviors which are not in line with this Ethics Charter, internal policies, applicable laws, or values promoted by the Group.

Speak up if you experience or witness disrespectful, inappropriate, illegal or unethical behavior. By upholding our freedom to raise concerns (including on an anonymous basis), this Ethics Line also contributes to safeguarding Rémy Cointreau's culture of openness.

Please note that the Ethics Line supplements the existing channels for reporting information. Employees can choose to report a problem through the Ethics Line, to their line manager or the Human Resources department.

To launch an alert with the Ethics Line, you can write to ethics.alert@remy-cointreau.com or complete the online form on our Internet website.

Rémy Cointreau has a zero-tolerance policy on retaliation against anyone who has reported an allegation or supported an investigation in good faith.



➤ Whistleblower Charter

➤ <https://www.remy-cointreau.com/en/home/contact-us/speak-up/>



MAKING DECISIONS

While the Ethics Charter can help guide every decision, there is not a relevant rule for every singular situation. Ultimately, making the right decision must rely on personal judgement, and the golden rule is that you shall ask for advice in case of any doubt. The following questions can help you resolve ethical dilemmas and make choices aligned with the company's values.

Is this decision taken in the best interest of the Group ?

Does this decision comply with principles set out in this Ethics Charter, Group policies or our values ?

Does this decision comply with local laws and regulations?

Can I confirm that this decision is not likely to have negative consequences for the Group ?

Can I confirm that this decision is not likely to damage the Group's reputation or stakeholders' trust?



If the answer is **YES** : the decision may be ethical, in case of doubt please ask for advice.



If the answer is **NO** : the decision may not be ethical, therefore please contact your Manager or the Ethics & Compliance department for advice.



DISCIPLINARY MEASURES

Any failure to comply with the rules of this Ethics Charter may result in disciplinary sanctions up to termination of employment and legal liability.

CONTACT

If you have any questions about any information in the Ethics Charter, you can submit your questions directly to the Group Ethics & Compliance department at compliance@remy-cointreau.com.



RÉMY COINTREAU

Terroir, people and time



POLICY INDEX

	TOPIC	POLICY
1	Environment	CSR Charter
2	Responsible Purchasing	Purchasing Ethics Charter Responsible Procurement Policy Group Purchasing procedure Supplier Code of Conduct
3	Responsible Consumption	Responsible drinking guidelines
4	Health, Safety & Quality	Health, Safety & Quality policy
5	Diversity, Equity & Inclusion	Diversity, Equity & Inclusion policy
6	Anti-Harassment	N/A
7	Human Rights	Human Rights Policy
8	Data Privacy	Data Protection Golden Rules
9	Responsible use of technology	Generative AI Policy
10	Conflict of Interest	Conflict of Interest Prevention Policy



POLICY INDEX

	TOPIC	POLICY
11	Transmission of Savoir-faire & Excellence	N/A
12	Fight against corruption	Code of Conduct
13	Fraud Prevention	Anti-fraud policy
14	International Trade Restriction & Anti-money Laundering	International Trade Restriction policy
15	Fair competition	Antitrust policy
16	Confidential Information	IT security policy Insider Trading policy
17	Responsible Communication	Group Communication Guidelines Social Media Guidelines
18	Lobbying	Lobbying policy
19	Protecting our assets	N/A
20	Ethics Line	Whistleblower Charter

DOCUMENT HISTORY

UPDATE

April 2024

OWNER

Group Ethics & Compliance department



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