

CODE OF CONDUCT

FAIR PLAY, EVERY DAY





“What’s important is to keep Fair Play!”

We are making René Lacoste’s sports slogan into a rule of conduct for our business and behavior. With this Code of Conduct, we want to clarify the rules that apply to all employees in the LACOSTE Group and to its stakeholders so that we can work together while respecting the laws, ethics, and, of course, the values that unite us: being accountable, audacious, collaborative and caring.

The Code of Conduct complements our internal policies and directives; it is not intended to anticipate or address every situation that may arise.

The principles and recommendations it contains show the path to follow to incorporate fair play in your behavior in the sporting spirit that has been behind our success.

One Brand, One Voice, One Team.

Thierry Guibert
CEO

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01

COMMUNICATE AND ACT: WE ARE ALL CONCERNED!



**IF YOU HAVE ANY DOUBTS
CONCERNING HOW THE RULES
STATED IN THIS CODE APPLY TO
YOU OR ANY OTHER EMPLOYEE,
PLEASE ASK YOUR MANAGER
OR THE HUMAN RESOURCES
MANAGER. ➡**

We strongly recommend that every employee who becomes aware, in good faith, of any misconduct or violation of this code, in particular concerning acts of corruption, unfair competition, malfeasance or infringement of Brand data, inform his or her manager or the human resources manager.

The above should be interpreted in all cases as an encouragement, not an obligation.

Employees who report any misconduct or violation of this code shall in no case suffer any consequence whatsoever, except in case of intentional false accusations and willingness to harm others.

02



ETHICS COMMITMENT BY THE EXECUTIVE COMMITTEE

LACOSTE has always committed to develop its activity within high ethical principles. LACOSTE demands its employees and recommends its partners to respect the rules of this Code of Conduct in compliance with the laws in the countries in which LACOSTE and its partners operate.

LACOSTE's Code of Conduct establishes the rules of the game for employees and for direct and indirect business partners: manufacturers, subcontractors, suppliers, licensees and distributors.

This code applies to ethical, social and environmental levels. Compliance with these rules is the basis of our corporate culture, which enables our stakeholders to trust us.

We respect all applicable laws, standards and regulations in all circumstances, just as we expect other economic players to acknowledge our rights to our brand and models.

— LACOSTE RESPECTS AND ENSURES ITS PARTNERS RESPECT THE FOLLOWING:

- The Universal Declaration of Human Rights;
- The Declaration of the International Labor Organization (*ILO*) on fundamental rights at work;
- The Organization for Economic Co-Operation and Development (*OECD*) guidelines;
- The United Nations Global Compact.

— EXECUTIVE COMMITTEE



Thierry Guibert
/ CEO



Catherine Marchand
/ Merchandising
& Design



Sandrine Conseiller
/ Marketing
& Branding



Didier Lalance
/ Markets &
Distribution



Philippe Pastor
/ Footwear &
Leather Goods



Dominique Brard
/ Human Resources
& Legal & Corporate
Affairs



Jérôme Le Bleis
/ Sourcing,
Manufacturing
& Supply Chain



Olivier Descamps
/ Finance &
Information Systems

03



RESPECTING THE RULES

FIGHT AGAINST CORRUPTION

All forms of corruption distort the rules of the game.

From now on, employees must never offer or promise, directly or through intermediaries, any personal or financial benefit with the aim of establishing or maintaining a business relationship with a third party, whether in the public or private sector. In the same way, employees must not accept such benefits in exchange for preferential treatment for a third party.

Furthermore, employees must abstain from any activity or behavior likely to give the impression of such conduct (*or of attempting such conduct*) or that might generate suspicion in that respect.

The granting of improper benefits with the aim of influencing a third party's decision may not only result in criminal charges, it may also constitute a violation of the obligation for employee loyalty.

An improper advantage may consist of any element of value which aims to favor the beneficiary (*e.g.: proposal of an employment contract or a service contract to a friend or relative*).

BENEFITS AND GIFTS

The game must be played in accordance with the rules of each competition: and may the best person win.

Business decisions cannot be based on inappropriate or unethical criteria. For this reason, it is not recommended for Group employees and members of the immediate families to offer, seek out or receive gifts or invitations from people maintaining or seeking to have commercial relations with LACOSTE.

If commercial circumstances should require an exchange of gifts or invitations, you must use common sense to ensure that it does not influence your decisions in any way.

In general, it is strictly forbidden to offer or receive the following gifts and invitations:

- Gifts whose value exceeds €50 (*or equivalent*);
- Invitations to extra-professional activities that exceed a value of €100 (*or equivalent*);
- Cash gifts or equivalent (*gift certificates*);
- Invitations that violate the other rules of this code.

Any derogation from the rules above must be formally approved by the Director of the organization (*affiliate, JV, Department...*) to which the employee is making the request.

CONFLICT OF INTEREST

— ON EMPLOYMENT

In accordance with these principles of equality and non-discrimination, employees' partners, spouses and close family members may only be hired as employees within the LACOSTE Group – *or selected as providers or external consultants* – based on their qualifications, their achievements, skills and experience.

— ON EXTRA-PROFESSIONAL ACTIVITIES

Employees' extra-professional activities must not directly or indirectly compete with LACOSTE's activities (*development, design, production or sale of fashion goods*), create risks for LACOSTE's reputation, or otherwise create conflict of interest with LACOSTE.

Employees must inform their superiors if the activity may present a conflict of interest.

— ON GROUP BUSINESS OPPORTUNITIES

Respecting the principle of loyalty, employees must not compete against the company. They must also not draw any personal advantage from business opportunities that they become aware of in the execution of their work contract, unless the company expressly renounces its right to assert its interests with respect to the business in question.

If, for personal benefits, an employee wishes to develop an idea, patent or business opportunity likely to interest the company, the employee must inform his or her manager, who will then inform the employee of the company's intent to defend its interests or not in that respect.

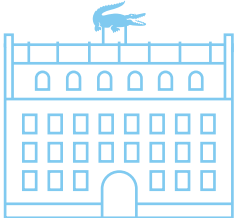
USE OF EXTERNAL PROVIDERS

The decision to use any service provider or outside consultant, whose annual global billing exceeds €30,000 (*or equivalent in local currency*), must be subject to a prior tender. The provider will be selected in accordance with the rules of this Code of Conduct. In order to not interfere in discussions and negotiations with the consulted companies, no information on the names of competitors, prices, competing proposals or budgets can be communicated directly or indirectly to these companies. Similarly, no favorable or unfavorable opinion may be transmitted during the competition.

Thus, employees' partners, spouses and close family members can be selected as providers or external consultants for the LACOSTE Group, exclusively based on their qualifications, their achievements, skills and experience.

IF COMMERCIAL CIRCUMSTANCES SHOULD REQUIRE AN EXCHANGE OF GIFTS OR INVITATIONS, YOU MUST USE COMMON SENSE TO ENSURE THAT IT DOES NOT INFLUENCE YOUR DECISIONS IN ANY WAY. ➡

04



PROTECTION OF THE COMPANY AND THE BRAND

USE OF COMPANY RESOURCES

— ASSETS AND RESOURCES

Each employee must use the Group's assets and resources (*premises, technical equipment and tools, computers, telephones, etc.*) in accordance with their professional purpose. It is everyone's responsibility to prevent any degradation, alteration, attempted fraud, theft, etc.

The occasional and reasonable use of these resources for private ends (*such as tools, office software, communication*) may be tolerated, under the supervision and with the approval of the management, within the legal framework.

— INTERNET

The Internet must be used according to the **Group's IT Charter*** and locally defined rules (*including e-mailings and access to the internal network*).

The charter specifies the following prohibitions:

- Viewing websites of private (*dating*), indecent, or gaming character;
- Participation in chain messages;
- Viewing, sending or storing information and documents of an obscene or defamatory nature, or that violate intellectual property rights.



* The Group IT Charter is available
on the LACOSTE intranet portal

PROTECTION OF THE BRAND AND CONFIDENTIAL INFORMATION

WORKING WITH INTEGRITY ALSO
MEANS PROTECTING LACOSTE'S
INTANGIBLE ASSETS, INCLUDING
BRANDS, REPUTATION AND THE
COMPANY'S CONFIDENTIAL
INFORMATION. 🐬

— DUTY OF CONFIDENTIALITY

Each person, on his or her level, is responsible for protecting confidential information in the company's possession, such as information on new models and products, business or strategic plans, financial information, organizational charts as well as other data concerning the organization of the company.

The obligation to respect confidentiality extends to confidential information sent or shared by third parties with whom we maintain business relationships (*partners, suppliers, consultants, customers*). Sometimes there are also legal obligations in this respect, such as customer data (*CRM*). This applies even if the employee should leave the Company.

In general and in order to preserve the company's brand image, each person shall refrain from public statements and other behavior that can be harmful for the reputation of the brand.

Unauthorized use or disclosure of confidential or private information may result in disciplinary action leading to dismissal.

— INTELLECTUAL PROPERTY RIGHTS

In order to avoid exposure of the brand to claims based on third-party intellectual property rights, persons working in domains that constitute the brand's visual identity (*including branding, product design, advertising and corporate communications*) must obtain prior approval from the Intellectual Property Department before any public divulgation.

FIGHT AGAINST COUNTERFEITING

As the notoriety of our brand grows worldwide, we are increasingly confronted with counterfeiting. Each person (*employee, partner and supplier*) commits to fight against counterfeiting by refusing any purchase / sale of counterfeit goods or to support in any other way this illegal and damaging trade. Any unauthorized use of our brands, also on-line, as well as any case of illegal sale, must be reported to the Intellectual Property Department by sending an email to counterfeit@lacoste.com

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05



RESPECTING PEOPLE

ZERO TOLERANCE FOR ANY FORM OF DISCRIMINATION, HARASSMENT, VIOLENCE

LACOSTE's employees and those of its partners must be treated with respect and dignity.

— DISCRIMINATION

No decision on employment, such as hiring, role allocation, salary, benefits, advancement, discipline, dismissal and forced retirement should be based on skin color, age, gender, sexual orientation, physical criteria, health status, trade union or political activities, religion, family status, pregnancy status, national or ethnic origin, nationality, presence of a physical or mental disability, military status, or be motivated by a reason contrary to law.

— MORAL OR SEXUAL HARASSMENT

LACOSTE is committed to maintain a workplace without any form of psychological or sexual harassment. Everyone must respect his/her colleagues and partners without trying to offend, hurt, humiliate, isolate or force them into error. Similarly, sexual harassment, both internally and as regards to third parties with whom we are in professional contact, is intolerable. Thus, any behavior of the type: inappropriate gesture, unwanted physical contact, emails, looks, comments, invitations, or sexual solicitations, is in no case acceptable. Sexual harassment can affect both men and women.

— VIOLENCE

No act of physical violence (*including intimidation, harassment and / or coercion*) or threats of violence against employees, property or the company is tolerated. This includes behavior of intimidating or abusive nature creating a hostile work environment.

— DISCIPLINARY PROCEEDINGS

Any disciplinary action should be defined in writing, explained in a clear and understandable way to the person concerned.

FREEDOM OF EXPRESSION AND SPEAKING OUTSIDE THE COMPANY

The LACOSTE Group respects and promotes its employees' right to freedom of expression, both inside and outside the company.

However, in general and as part of his or her duty of loyalty, and in order to preserve the company's brand image, each person shall refrain from public statements and other behavior that can be harmful for the reputation of the brand.

— SPEAKING AND SOCIAL MEDIA

In order to protect the Group's and the Brand's interests when speaking about the Group, its subsidiaries or shareholders, while outside the Group, the following rules must be respected:

- Only employees from the Press Relations Department can respond to external requests for formal or informal information. Any public statement about LACOSTE must be approved by this same department by sending an email to the following address: pcol-let@lacoste.com
- The Group's employees are not authorized to communicate information or to engage in social or traditional media activities on behalf of LACOSTE. The company's participation in social or traditional media is managed by the Communication department.
- No Group employee may engage or associate LACOSTE with a position or statement.

— EXTRA-PROFESSIONAL ACTIVITIES

LACOSTE respects each person's individual commitment in public activities of a political, social, religious, associative or civic nature.

- The employees concerned must clearly specify that, in the performance of their extra-professional commitments, they do not represent LACOSTE or its interests.
- These activities must be carried out exclusively outside the company and outside working hours and the employee must not invoke its membership of the LACOSTE Group.
- They should not be in direct or indirect competition with LACOSTE's activities (*development, design, production or sale of fashion goods*) or create risks to LACOSTE's reputation or otherwise create a conflict of interest with LACOSTE.

Knowing that some countries may prohibit corporate contributions to political parties or candidates, any contribution of our company to political, religious or trade organizations must comply with local legislation and be submitted in advance to the CEO of LACOSTE.

WORK ENVIRONMENT / HYGIENE AND SAFETY

LACOSTE is committed to providing a healthy and safe work environment for our employees and stakeholders in order to prevent accidents and health problems directly from or in connection with work. No LACOSTE employee and none of its partners shall be exposed to situations, both inside and outside the workplace, which could be dangerous or damaging to their health.

Each person must respect the laws and rules that apply to our work. Similarly, direct and indirect providers must follow appropriate rules on health and safety. In this context, they must sign and follow the instructions of the LACOSTE Partner's Code of Conduct.

NO LACOSTE EMPLOYEE AND NONE OF ITS PARTNERS SHALL BE EXPOSED TO SITUATIONS, BOTH INSIDE AND OUTSIDE THE WORKPLACE, WHICH COULD BE DANGEROUS OR DAMAGING TO THEIR HEALTH. 🚫

06

ENVIRONMENTAL PROTECTION



**LACOSTE AND ITS PARTNERS MUST
COMPLY WITH THE LAWS AND
REGULATIONS IN EFFECT ON
ENVIRONMENTAL PROTECTION
IN THE COUNTRIES WHERE THEY
OPERATE. 🦋**

Thus, all precautions and measures must be taken on environmental issues in order to limit the impact of our activities on air pollution, soil, environment and human health in general. Everyone must agree to focus on the development and use of technologies which are the most respectful toward the environment.

The Code of Conduct is available
in 9 languages on the Lacoste intranet portal
and on www.lacoste.com

