

Compliance Management Policy





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Message from the CEO

Gilles Galliou
Chief Executive Officer

Dear Customers, Business Partners, Stakeholders and Colleagues,

The foundation of our relations is trust. Trust is precious and has to be nurtured every day. Building and maintaining trust is at the core of our Company's values and is central to our Company's Environmental, Societal and Governmental (ESG) commitments for sustainable development, which is so urgent in today's world.

First and foremost, that means that our Company's actions must also be based on laws and integrity principles. Illegal transactions and activities are therefore unacceptable – everywhere in the world and without exception.

Our Compliance Management Policy reflects this and provides the core principles our Company must comply with in all we do.

Compliance and integrity protect our license to operate world-wide, and we are strongly committed to acting responsibly towards our employees, customers, consumers, business partners and society in general.

This Compliance Management Policy presents our Company's principles of business conduct that apply to our activities. These principles are not only ingrained into our activities through this policy, but also into our processes and overall values.

Our Company's vision is "Healthy Environments for Everyone, Everywhere," and to me this can only be achieved by maintaining the trust of people and society in our Company through good compliance.

Yours,
Gilles Galliou



Introduction

Why is this compliance management policy important for me?

This Compliance Management Policy outlines Envu's principles of business conduct. It defines the boundaries within which we as Envu employees must act in compliance with laws and internal policies. Doing so protects Envu and each of us.

This Policy does not cover every situation we may encounter. However, it is our compass for acting with integrity. Within this document we address practical questions to illustrate the risks we are faced with and the resources our employees can use to safely navigate through them.

Living these principles

We take pride in doing things right. We need to exercise good judgment, act with integrity, and observe the principles of this Policy each and every day.



Each of us needs to be familiar with this Policy and understand the laws, regulations and other Envu policies that apply to our job responsibilities. Then, we need to put these principles into use with every decision and action we take. Together, we can prevent and address risks as they arise.

Doing the right thing

Our decisions are legal, ethical and responsible. Doing the right thing is not always easy or clear, but it is necessary. If you need help, our internal experts are always available to provide input or guidance to all Envu employees.



Asking questions and raising concerns

Envu provides information, resources and advice to prevent violations of the law or company policies. Asking questions and raising concerns helps Envu maintain a strong culture of compliance.

- All employees are required to immediately report any violation of this Policy, including violations committed by external parties, and
- All employees are expected to report any concerns in this respect.
- Likewise, any property offense (e.g. embezzlement, theft or fraud) involving company assets is to be reported without delay.

If you have a question, concern or would like to report something:

- As an employee, speak to your manager or your manager's supervisor, or you may contact the Law, Patents and Compliance Department, Human Resources (for HR-related matters) or Internal Audit, or

- As an employee or any person outside our Company, contact the Envu Compliance Hotline, which is a safe and secure way to confidentially report a compliance concern. The Hotline is available 24 hours a day, seven days a week via telephone, email and internet – and you can choose to remain anonymous, where permitted by local law.

Envu will not retaliate and does not tolerate retaliation against any employee who in good faith raises a concern.

Cooperating with authorities

We make every effort to cooperate with government authorities and agencies while at the same time protecting Envu's interests and rights. Whenever we provide authorities with company information or make public announcements, we do so completely, correctly, and timely.

01

We compete fairly
in every market

Our commitment

Envu competes on the merits of its products and services and firmly supports the existence of free and open markets. We strictly adhere to the laws designed to promote and protect competition.

Interactions with competitors

Our interactions with competitors must comply with the law. We do not, for example, enter into agreements with competitors to fix prices or terms of sale, allocate markets, restrict production, or influence the outcome of contract bidding processes.

We will not be a part – or even give the appearance of being a part – of a conspiracy or cartel. We do not exchange or discuss sensitive business information with our competitors. This includes pricing, sales volumes or production capacities, costs or margins, customer information, marketing and sales strategies, research and development efforts, and other similar data.

Envu does not enter into any understanding, arrangement, collaborative action or agreement with competitors with the intention of limiting or restricting competition.

Interactions with customers and suppliers

We are careful when granting exclusive rights to customers or suppliers or entering into agreements that limit the way in which goods or services can be used, resold, or priced. We do not, for example, require customers to stop selling a competitor's product before we will supply them with our product, or to resell our products at a fixed or minimum price.

Abuse of dominant market position

In cases where Envu has a dominant market position with a particular good or service, we do not abuse or exploit our economic strength to unlawfully eliminate competition, prevent new competition from entering the market, or manipulate prices. We do not, for example, deliberately sell our products below cost or refuse to sell customers one product unless they agree to buy another product from us.



Key message

Antitrust violations are inherently bad for business. They undermine markets and harm consumers.

Q. At an industry conference, a former Envu colleague who now works for a competitor started talking to me about the new sales campaign his employer was planning to implement. I am pretty sure he shouldn't have shared this information with me, so I told him that and quickly left the discussion. Did I do the right thing?

A. Yes. At trade shows and industry events, there are legitimate topics competitors can discuss such as general scientific developments and regulatory reform. However, you were right to stop your conversation and leave as soon as your former colleague raised a competitive or strategic topic. It also helps to make sure others know why you are leaving and to bring the incident to the attention of the Law, Patents and Compliance Department.



Ask yourself

Am I sure that the proposed agreement or activity fully complies with antitrust laws?

Some agreements or activities will always be considered antitrust violations. Others depend on the specific facts and circumstances. Envu could face serious fines, lawsuits, lost sales, and severe harm to its reputation if we do not follow the rules. Individuals involved in antitrust violations face termination of employment, fines and even imprisonment.

To navigate safely, involve the Law, Patents and Compliance Department.



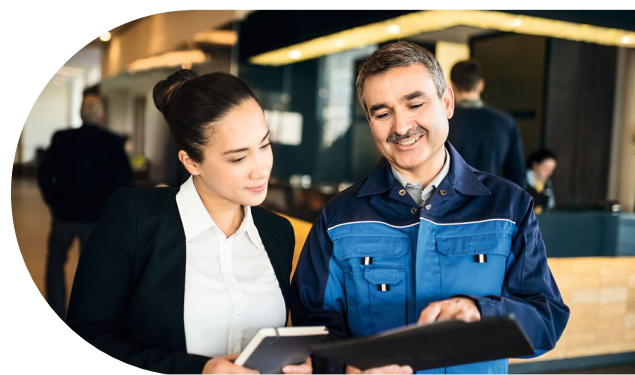
02

We act with integrity in all our business dealings

Our commitment

Envu does not tolerate corruption and will refuse any business opportunity that involves any form of bribery.

We never offer or give a benefit to try – or even give the appearance of trying – to wrongfully influence someone else’s decision, action, or point of view.



Benefits to third parties

Envu only allows employees to offer or give modest benefits, such as gifts or hospitality, to third parties in certain situations during the normal course of business. Employees cannot offer or give a benefit if the intention is to wrongfully influence the recipient.

“Wrongfully influence” is defined as the intention to cause the recipient of a benefit to misuse his or her position to provide an inappropriate advantage. Some examples of benefits that can be used to wrongfully influence include:

- cash, gift cards or other cash equivalents
- gifts, meals, travel or hospitality
- invitations to events and meetings
- offers of employment
- business opportunities
- personal favors
- donations to a chosen charity
- free or discounted products

Some examples of inappropriately obtained advantages as a result of offering or giving benefits to wrongfully influence someone include:

- encouraging, holding up or speeding up a decision
- winning a contract
- continuing, growing or enhancing existing business
- approving a permit or license
- passing an inspection or ignoring a violation

Interaction with government officials or healthcare professionals

In some countries, it may be generally illegal to offer or give anything to a government official, healthcare professional or healthcare organization, even if it is not for an inappropriate advantage. Even where not prohibited, giving a benefit may require public reporting or disclosure. Note that in some countries, a healthcare professional is considered a government official.

Envu prohibits the use of payments made to a government official to speed up or facilitate the performance of routine, non-discretionary services or actions, such as issuing a license or permit. However, fees paid in accordance with formal government procedures officially accompanied by an invoice or receipt for payment are permissible.

Using third parties

We do not use another person or entity (such as a third party, distributor, agent or advisor, family member or family business) to offer or provide a benefit that we cannot offer or give ourselves. Envu uses a due diligence process to review third parties for indications of illicit practices and connections to government officials to assess the corruption exposure.

Q. Our distributor says that he can win a new government contract for Envu if we make a contribution to a certain charity. I think the president of the charity works for the government agency that is awarding this contract. What shall I do?

A. Do not make any contribution and report this distributor to the Law, Patents and Compliance Department. This distributor is suggesting that we disguise a bribe in the form of a contribution. A dishonest distributor or agent might also demand a higher than expected fee. He or she could potentially use a portion to bribe the officials responsible for the regulatory approval.

Money laundering

We conduct business with reputable third parties who engage in legitimate business activities. To help ensure compliance, we follow all local laws designed to prevent money laundering. Additionally, Envu will not do business with individuals or entities sanctioned for having a past or ongoing association with criminal or terrorist activities.



Key message

Envu’s reputation is upheld by every employee doing the right thing. There is no justification for illegal business practices – ever. We accept the fact that we may lose some business opportunities as a result.



Ask yourself

Am I following local laws and Envu policies regarding the business use of gifts and hospitality?

Am I sure I’m not trying to wrongfully persuade someone to do something for Envu?

If you are not sure about offering a modest business gift or what limits might apply in your country, contact the Law, Patents and Compliance Department, especially before offering or giving anything to a government official or healthcare professional.

03

We balance economic growth with ecological and social responsibility

Our commitment

Envu endeavors to develop, produce and sell products in a safe and sustainable way that meets the needs of our employees, customers and society, and protects the environment.

Responsible business practices are the foundation of our activities. We pursue an inclusive business approach, in which we combine financial objectives with societal and environmental responsibility, and balance short-term and long-term targets. We measure key non-financial indicators with the same rigor as financial indicators.

We are committed to meeting all health, safety and environmental laws and industry standards in every aspect of our business. Product stewardship means we offer products that are safe for people, animals and the environment when properly used.

Health and safety

We respect and care for the environment and the safety, health and well-being of employees, contractors, visitors or neighbors around the world. This includes the health and safety of everyone who uses our products as well.

Product safety

We evaluate and address the potential health and environmental risks associated with our products throughout their entire life cycles – from research and development to production, marketing, use and disposal. We openly communicate the safe and proper way to use our products and the risks associated with their use by providing appropriate instructions and warnings.

Occupational health and safety

We share responsibility for maintaining a healthy and safe workplace. By emphasizing best practices and safe behaviors, we promote an overall safe working environment and minimize the likelihood of an accident, injury or illness.

Process and plant safety

Our manufacturing processes and methodologies are designed to help ensure that our operations do not pose an inappropriate risk to ourselves, the environment or our communities. We continually work to reinforce and optimize our process safety culture and related standards.

Transportation safety

We have people and procedures in place throughout the organization to help ensure that materials are handled and transported safely and securely and are in line with applicable regulations.

Environmental protection

Our actions, operating practices and products should not damage the environment in which we operate.

To uphold this commitment, we work hard to reduce the environmental impact of our products and operations, use natural resources responsibly, improve

our resource and energy efficiency, and develop new technologies, optimized processes and innovative products that serve to protect or even benefit the environment, nature, and the climate.

We further observe all laws and adopt our own strict regulations regarding the generation, use, storage and disposal of waste, emissions, hazardous chemicals, and other materials.

Quality

“Quality in all we do” is our strong commitment to safeguard trust in the Envu brand.

Our stringent, enterprise-wide quality management helps ensure that our high-quality products and services meet the needs of our customers and are compliant with all applicable internal and external regulations. In areas where regulations require specific practices in data capture, processing, maintenance of data for the development, production, quality control and distribution of products, we adhere to strict data integrity standards. We collect feedback from our customers to continuously improve the quality of our products and services. We also continuously monitor the safety and quality of Envu products for the benefit and safety of customers.

Supplier management

We expect our suppliers and subcontractors to share Envu’s commitment to operating in a responsible and ethical manner, consistent with the principles set forth in this Policy and in Envu’s Supplier Code of Conduct. We also expect our suppliers and subcontractors to maintain these standards further down the supply chain. We consider compliance with these standards an important factor when choosing new suppliers or continuing our relationships with existing ones.

Human rights

Envu recognizes and respects human rights wherever it does business, both internally and within its external sphere of influence. Our standards require all employees to act with fair and lawful conduct toward colleagues,

business partners and local communities. We are committed to upholding and supporting human rights, including in our supply chain. Our human rights position is unequivocal and includes a strict ban on child labor.



Key message

Envu takes a strong stance on quality, safety, environmental stewardship and human rights and expects equal commitment from its suppliers.



Ask yourself

Am I making a good, safe choice or am I at risk of injuring myself, the environment or others?

Do I know what to do in an emergency or when I see an unhealthy or unsafe condition or behavior?

Have I accurately presented the raw data of my work?

Am I aware that I need to forward adverse safety- or quality-related information about products for human use within 24 hours?

If you don’t know or aren’t sure about the best way to proceed, ask your manager, your Health, Safety and Environment (HSE) manager, the Quality Assurance Department or the Law, Patents and Compliance Department.

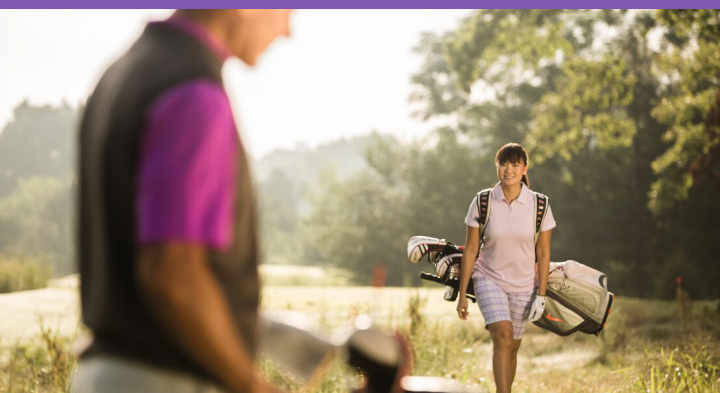
04

We observe trade controls that regulate our global business

Our commitment

Envu supports national and international initiatives that aim to prevent the misuse of its goods or technologies as nuclear, biological or chemical weapons or in the event of terrorism or war.

We adhere to trade control regulations, sanctions and other efforts intended to promote international peace and stability. We also abide by local laws governing international trade. Envu expects third parties who act on its behalf to strictly adhere to these same commitments.



Trade controls and economic sanctions

We have internal processes and systems designed to prevent the use or diversion of Envu goods, software, technologies or services in improper ways. If we have concerns, Envu will not do business with the potential customer.

We also will not do business with entities or persons that have been identified as being associated with nuclear, chemical or biological weapon activities, terrorism or narcotic trafficking, or other improper activity. In addition, we observe restrictions on payments or other financial dealings involving these prohibited parties.



Key message

Trade compliance reduces the risk that our goods or technology end up in the wrong hands.



Ask yourself

Do I know if this transfer of goods, technology or services from one country to another (even if between Envu affiliates) is subject to an applicable trade restriction?

Will I violate any trade controls if I share this intellectual property, know-how or trade secret with someone else (even with another Envu colleague)?

Designs, drawings, software and other intangibles are harder to monitor than a pallet of products, but their improper use can be just as, if not more, dangerous. If in doubt, ask your manager, International Trade Control expert or the Law, Patents and Compliance Department.

Q. My team is in discussions to supply a chemical we manufacture. The interested buyer is in a different country. I'm sure there are trade rules I need to follow. How do I find out what they are?

A. Trade controls are complex and they sometimes conflict with each other. Involve the trade control experts that support your local organization before conducting business internationally.

05

We keep accurate books and records

Our commitment

Envu fully and accurately records its business activities and financial transactions to provide a fair and complete picture of its operations, assets and financial condition.

We comply with relevant financial reporting and accounting standards and principles, as well as tax laws and regulations. Our internal control system is designed so that all key business processes are followed and transactions are fully and correctly captured.

To ensure our books and records are transparent and reliable for financial, regulatory and other reporting purposes, we:

- truthfully, accurately and completely reflect exactly what occurred and never hide or overstate transactions or alter documents or records
- make information about business developments and results readily available through timely reporting and publication
- retain records and any required supporting documentation in a manner and for as long as statutory or internal rules require, and never destroy records that are relevant to a threatened or pending government investigation or legal proceeding
- use clear and concise language when communicating to reduce the likelihood that the content is misinterpreted, misused or taken out of context



Key message

Reliable information is critical for good decision-making by management, investors and the public.



Ask yourself

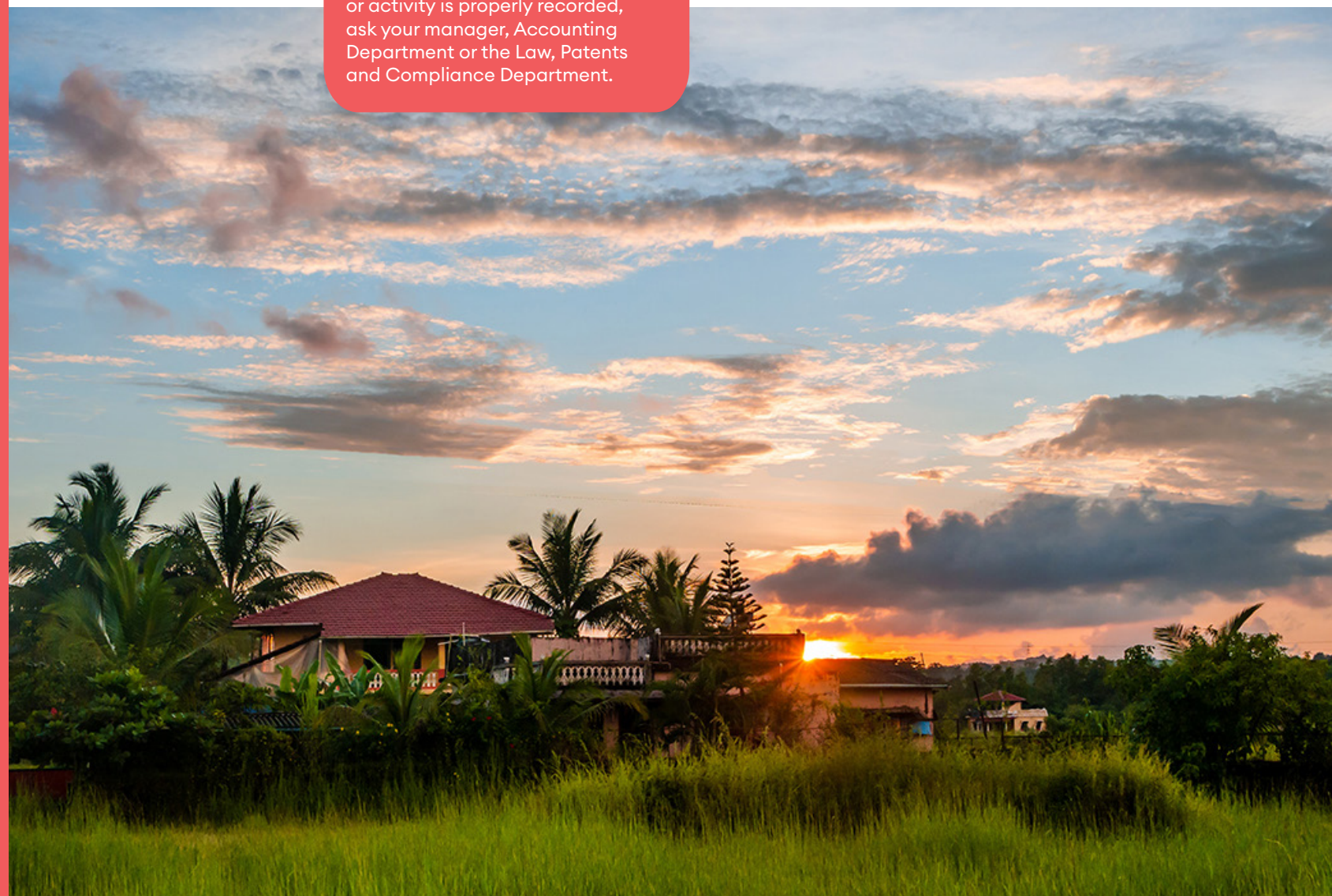
Have I accurately documented Envu's business transactions or activities?

Am I keeping the records that I am responsible for retaining for as long as necessary to meet our legal recordkeeping requirements?

Good recordkeeping matters for everyone, not just accountants. If you are not sure whether a transaction or activity is properly recorded, ask your manager, Accounting Department or the Law, Patents and Compliance Department.

Q. My supervisor asked me to wait until next quarter before recording an expense we incurred. She said it would look better, since we are just at budget in this quarter. Is that OK?

A. No. These expenses must be accounted for in the period they were incurred. Otherwise, our records would not be truthful, accurate and complete.



06

We treat each other with fairness and respect

Our commitment

Envu strives to create the best environment for employees to perform, innovate and develop.

Envu is a place where employees can positively change the world with their work. To create value for a diverse world, we need to be a diverse workplace that empowers people with different backgrounds and skills to make a difference.

We follow certain basic standards of behavior, so that no person is treated unfairly or discriminated against, harassed or subjected to other unprofessional or disrespectful behavior, or retaliated against for sharing his or her good faith concerns.

Fair treatment

We ensure fair compensation and make decisions with regard to employees based on factors such as their competencies, performance in their jobs and behavior in the work environment. We do not make our decisions or treat individuals differently – consciously or unconsciously – based on characteristics unrelated to work, such as race, color, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law.

Respectful relations

We treat others with respect. This includes colleagues and third parties, such as customers, suppliers and officials. Bullying or harassment of any kind is forbidden.

We understand bullying or harassment can create an intimidating, abusive or hostile work environment. The occurrence of harassment or bullying is determined based on the effect it has on the affected person's dignity. Typical forms of bullying and harassment include spreading malicious rumors, humiliating others or setting them up to fail, excluding others from social life at work, and sharing criticism with other unrelated employees.

Free and open sharing of concerns

Envu encourages us to share our good faith concerns about discrimination, harassment, disrespectful or unprofessional behavior, or any other possible violations of law, company values or policies, as we respect diversity of thought and freedom of speech.

Envu will not tolerate retaliation against an employee who in good faith raises a concern or takes other appropriate action, even if the concerns ultimately prove not to have been justified. An employee must not be threatened or punished either because he or she has expressed a good faith concern or as a way of keeping the employee from expressing his or her concern.

Any form of retaliation is unacceptable.

**Key message**

We treat each other fairly and respectfully. If we think something is not right, we speak up. We take a stand without fear of retaliation.

Q. During a group conversation at lunch, a colleague told a joke that made fun of another colleague who had just transferred from another country. Even though it wasn't aimed at me, I found it offensive but didn't say anything. What should I have done?

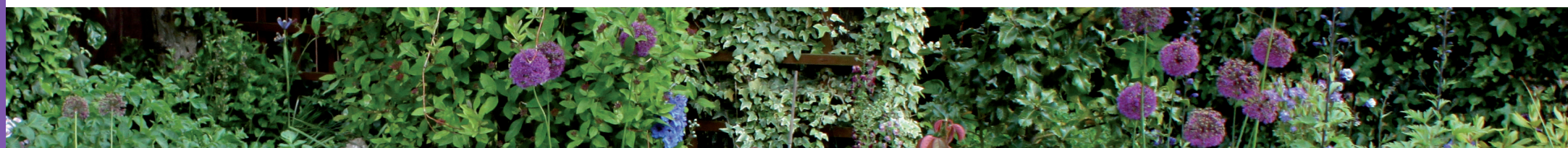
A. Even when someone is trying to be humorous or does not mean to be inappropriate, that behavior is still unacceptable if someone might find it hostile or offensive. You should have told the person telling the joke that you found it offensive. Depending on the circumstances you also might feel it best to speak to your manager.

**Ask yourself**

Did someone's action or statement make you feel uncomfortable?

Did this action or statement make someone else uncomfortable, whether you witnessed it yourself or that person expressed his or her discomfort to you?

If you are not sure, bring the matter to the attention of your manager, your manager's supervisor, your HR Business Partner, the Law, Patents and Compliance Department, Internal Audit or the Envu Compliance Hotline.



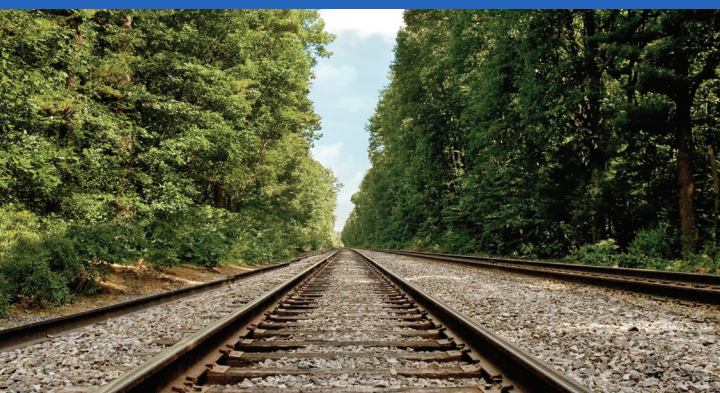
07

We protect and respect intellectual property rights

Our commitment

Envu safeguards the value of its research and development efforts and the goodwill and reputation of the company and its brands. Envu respects the valid rights and claims of any third party.

Intellectual property rights provide innovative companies like Envu an opportunity to profit from the results of its inventions and recover the cost of its investments. These rights lawfully restrict or prevent others from using Envu's intellectual property without Envu's permission.



Protecting confidential information

To preserve the benefits of Envu's ideas, efforts and accomplishments, we limit access to confidential (internal, restricted, secret or other proprietary) information. We also limit the type and amount of confidential information we share with third parties or in public places and secure the integrity and availability of our confidential information to prevent it from being lost, stolen or misused.

An employee who has access to Envu intellectual property or confidential information may only access, use or retain this information when and as required to perform his or her job responsibilities. If that person is no longer employed at Envu, he or she must not take or keep information belonging to Envu or use Envu information for other purposes, including for the benefit of a future employer.

Common types of intellectual property rights include:

- patents
- trademarks and logos
- copyrights
- industrial processes, methods and designs
- other forms of proprietary information, such as trade secrets and know-how

Common types of confidential information include unpublished information regarding:

- research and development efforts
- new product or marketing plans
- business strategies
- financial projections
- merger or acquisition activities

Sharing confidential information

Before sharing proprietary information or receiving it from someone else, we enter into a confidentiality or license agreement that defines how and under what conditions the information can be rightfully accessed, used or retained. We keep information belonging to others separate from our own, so as not to impair Envu's rights in knowledge we have independently developed.

Respecting third party rights

We are careful not to use, copy or incorporate the valid, legally recognized intellectual property or confidential information of others unless we have their permission or any other right to do so.



Key message

Intellectual property rights are valuable assets. We protect this value for Envu. Likewise, we don't incorporate someone else's intellectual property into our own work unless we're certain we have all the rights needed to do so.

Q. I occasionally like to work at the local coffee shop near my house. What can I do to safeguard Envu's information?

A. You can avoid inadvertently sharing confidential information while you're off company premises by making sure no one can overhear any business-related phone calls or view your computer screen. Never leave your computer, phone or other device unattended where it could be stolen, and always use your VPN secure connection to log onto Envu systems.



Ask yourself

Can I use a list of customer contacts I put together when I worked at another company?

Can I reuse information that I found on the Internet in my activities for Envu?

Is someone else infringing on Envu's intellectual property rights, or could Envu be potentially infringing the rights of someone else?

If you are not sure, let your manager or the Law, Patents and Compliance Department help you determine what's permissible and what's best to avoid.

08

We act in Envu's best interest

Our commitment

Envu employees are careful to separate their own personal interests from those of Envu.

We make decisions impartially, without letting an opportunity for personal gain adversely affect our judgment, our job performance or our decision-making. When facing an actual or a potential conflict of interest, we are expected to disclose the situation immediately to our manager. The manager then decides how to address the conflict.

Employment or business relationships with relatives and friends

We do not allow the existence of a family or personal relationship to influence our decision-making in relation to employees or job applicants, or contracts with third parties. This includes, for example, decisions taken with respect to a company owned or controlled by a family member or friend.

When engaging third parties, objective criteria are applied such as price, quality, reliability and ability to meet technical standards. We similarly make decisions with regard to employees and job applicants based on factors such as their competencies, job performance and behavior in the work environment.

Q. My daughter just became the second managing director of the event management agency that is organizing our next Global Sales & Marketing Meeting. I am part of the team that has the responsibility for managing this event. The event management agency was already on board before my daughter was promoted. Does this situation present a conflict of interest?

A. It could. Even situations that might have the potential for a conflict of interest or raise the appearance of a conflict of interest must be disclosed promptly. Consult your manager or contact Law, Patents and Compliance, who will advise you on how to handle a situation like this.

Outside engagements

As Envu employees, we must not enter into an employment relationship with suppliers, competitors or third parties, or provide, whether in return for payment or free of charge, services on a freelance basis to suppliers or competitors, without first notifying our manager. Freelance services to other third parties need to be notified as well in case Envu's interests may be affected. We also must not set up our own business without similar prior notice. In some countries, approval may be required.

Gifts from others

We must not demand personal benefits such as cash, loans, gifts, hospitality, meals or tickets for sports or entertainment events. Doing so could affect our ability to make an objective decision in the best interest of Envu, for example, in connection with the negotiation, award or performance of a contract.

We also do not accept personal benefits in the context of the negotiation, award or performance of a contract. We can only accept unsolicited gifts, hospitality or invitations to meals or events provided that they are of modest value and there is no conflict of interest. In this context, we comply with all applicable laws and Envu policies, including any local policies that may further limit or restrict the receipt of such benefits.

Use of company property

We do not use items belonging to Envu (such as equipment, goods, vehicles, office supplies, documents, files, programs, data and data storage media) for our own personal purposes or remove them from company premises except as expressly permitted by a Envu policy or with prior manager approval.

We use company credit or debit cards, cards for gas stations, and access cards to company buildings, sites, and parking or similar establishment, only for the purpose and permitted use for which they were granted. Additionally, we do not transfer them to or share them with other colleagues or third parties.

Social media

When using social media for business communications, we obtain approval from Communications before posting in the name of Envu. We must use these social media platforms responsibly and in the best interest of Envu, and never post or publish abusive or offensive content or internal confidential information. If we discuss work-related topics in our private activities in social media, we must make it clear that we are expressing our own personal opinion and not reflecting the views of Envu.

**Key message**

Perceived conflicts of interest can be just as damaging to our reputation as real ones. We should be alert to situations where someone might think the aim of our action, decision or statement is to gain an undue advantage.

Q. During negotiations with a new supplier, I received an expensive gift. Returning or refusing the gift could be perceived as an insult in my country. What shall I do?

A. You must contact your manager or Law, Patents and Compliance. If it is not possible to return the gift for cultural reasons, it could be accepted as Envu's property or donated to charity.

**Ask yourself**

Could others think I am personally benefitting from what I am planning to do?

Do I "owe" anything to the giver if I accept this gift?

It can be challenging to distinguish between what is appropriate and what isn't. When in doubt, consult your manager or Law, Patents and Compliance for guidance.

09

We protect and secure personal data

Our commitment

Envu strictly adheres to the laws designed to protect and secure the privacy and confidentiality of information about individuals. This includes personal, health, family, financial and similar information.

We are careful not to disclose personal data, within or outside the company, except when we are legally permitted and have a legitimate business need to do so.



Proper handling of personal data

As part of our normal business operations, we may collect, process and/or transfer personal data about various individuals, including customers, employees, vendors or other business associates. We handle personal data only to the extent we have a specific, definable business need for the information and in compliance with:

- applicable data privacy laws, including those that impose additional protections for personal data considered particularly sensitive
- consent of the individual whose data we handle, when consent is needed
- statements about our privacy practices, such as those Envu provides to users of its websites and mobile apps.

Types of sensitive personal data that require special protection are defined by local law. Such data can include government identification number, financial account information, date of birth, home address, health information, labor union or political affiliation or criminal record. We take extra care when handling these types of data.

Q. A supplier wants to send promotional materials to people who registered on our website to participate in a Envu event. Can I provide the supplier with their names and contact information?

A. Envu’s privacy policy on the Internet states that we share information that is submitted on our websites only with the submitter’s consent, or when required or allowed to do so by law. Unless these conditions are met, we cannot share this information with the supplier.

Preventing data breach and data loss

We are required to take reasonable action to protect personal data from a breach or loss. A data breach occurs when an unauthorized person gains access to personal data as a result of intentional or unintentional acts by a Envu employee

or a third party. A data loss occurs when personal data is lost or mistakenly destroyed, as might happen when a laptop or other device containing a copy of unencrypted information is misplaced or stolen.

Some of the steps to minimize the risk of data breach or data loss include requiring prior approval by the local Law, Patents and Compliance Department before transferring data, and using technical measures such as encryption and access controls. Should a data breach or loss occur, Envu will promptly notify government authorities and/or any affected individuals as and when required by applicable law.



Key message

At home, we protect information that others could use to invade our privacy or steal our identity, like our home address, government identification number, and health information. At work, we handle others’ personal data with similar care.

Q. We use a third-party supplier to host a Envu-owned website. I heard that this supplier’s network was hacked, and the hackers might have gotten access to users’ email addresses and passwords. I am responsible for administering the website. What should I do?

A. Immediately notify the Data Privacy Business Partner so that Envu can respond quickly and responsibly to this suspected data breach. A data breach is a serious event. Don’t try to handle it on your own.



Ask yourself

Do I need access to this data and if so, am I handling it as required?

Must I protect the data I am handling? Is the data sensitive, such that I would want to secure it if it belonged to me?

Have I done what is required to secure the data?

Would it harm anyone if I lost or mistakenly disclosed the information?

Privacy laws vary by country. The laws that apply depend upon where and how the information is handled and will determine what to do when a breach or loss occurs. Your manager, Data Privacy Manager or the Law, Patents and Compliance Department can advise you as to which laws apply and how best to comply.



Our compliance management system



Envu maintains a comprehensive system designed to promote and reinforce compliant behavior. The elements of this system foster a positive compliance culture throughout our worldwide organization and help ensure integrity is part of every employee's daily business activities.

Risk identification and mitigation

Compliance, HR, Internal Audit and Risk Management functions work together with the business and functions at global and local levels to proactively identify and address the most significant compliance risks. Based on the identified risks, Envu uses the following components to incorporate preventative measures into daily business activities:

Policies

Envu policies guide employees on how to put the principles of this Compliance Management Policy into practice. By establishing clear standards and rules, our policies help employees carry out their job responsibilities in compliance with applicable laws and regulations.

Procedures

Envu designs and implements specific methods at global and local levels that help employees adhere to Envu policies in their daily business activities and prevent potential violations of law. These procedures include in particular the Tender Tracking and Third Party Due Diligence (TPDD) systems.

Training

Envu targets training based on job responsibilities so that employees receive guidance about the specific compliance topics and risks most relevant to their positions. By reinforcing job requirements and expected behaviors, Envu strives to avoid violations and proactively address its most significant compliance-related concerns. Attendance of employees to the trainings which are part of the employees training plan is mandatory.

Monitoring

Envu performs compliance assessments on a regular basis to ensure the implemented measures are effectively mitigating the identified compliance risks.

Reporting

Envu provides a global Compliance Hotline, administered by an independent external service provider, as a safe and secure means for employees, customers and others to confidentially (and anonymously, where permitted by local law) report their compliance concerns. The Compliance Hotline can be reached 24 hours a day, seven days a week via telephone, email and internet.

Communication

Envu communicates with employees through multiple channels to ensure the principles of business conduct, policies and procedures are widely known. The goal is to equip employees with the information, resources and guidance they need to do their jobs in a compliant manner.

Every supervisor must organize his or her area of responsibility to ensure adherence to this Compliance Management Policy and applicable law. Supervisors must communicate the rules applicable in their areas of responsibility and enforce them. Problems must be actively addressed and resolved.

Investigations and audits

Every compliance incident brought to the attention of the compliance organization is assessed and, if required, investigated in a timely manner. Envu's compliance organization conducts investigations objectively. It protects the confidentiality, dignity and fair treatment of those involved and those who are witnesses to the matter, while assuring the integrity of the investigation. Employees are required to cooperate fully in any investigation. Employees involved in compliance violations may be subject to specific sanctions. In addition, other measures such as process improvements may be implemented to mitigate identified risks. Additionally, compliance program audits evaluate the implementation and effectiveness of the compliance program, identify risks and recommend measures for adopting best practices.

Envu evaluates and improves the effectiveness of its compliance program in light of the current global and local business and legal environment. Risks and

functional processes to mitigate such risks are identified and implemented in the countries as part of the Integrated Compliance Monitoring (ICM) process.

Our compliance organization

A worldwide compliance organization, headed by the General Counsel of Envu as Chief Compliance Officer, supports our overall compliance approach.

Every region where Envu does business has a Lead Legal Counsel responsible for the local implementation and effectiveness of our compliance management system. Furthermore, the HR and Data Privacy Business Partners and IP Counsel are responsible for compliance in their respective fields.

These compliance experts provide guidance, assess and address risks, conduct compliance training and investigate any alleged compliance violations, with the support of outside counsels to the extent needed.

Roll out of the policy

Every Envu employee must have access to the Compliance Management Policy. All new Envu employees must be provided access to this Corporate Policy as part of their onboarding procedure.

The compliance web-based trainings are available in Learning Portal and assigned to every newcomer directly.

Hotline contact information

Phone:

+1(800) 461-9330

Country specific Compliance Hotline numbers are listed on the internet site below.

Web reporting:

<https://bit.ly/EnvuCompliance>

Appendix

Definitions and abbreviations

HR	Human Resources
HSE	Health Safety Environment
IP	Intellectual Property
VPN	Virtual Private Network

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