



**Global Policy**  
**Internal Code of Conduct**

**Policy No.:** 1.02 (Version 2.0)  
**Issue Date:** 14 April 2025  
**Applies to (Region):** All  
**Applies to (Department):** All  
**Contact Persons:** Laura Jacob, Head of People, Culture & Communication  
Troy Randolph, Chief Financial Officer  
**Approver:** Gilles Galliou, Chief Executive Officer

**Signature of Approver:**

Signed by:  
*Gilles Galliou*  
CA6C0C62004B48B...

**Contents**

1 Executive Summary..... 3

2 Purpose Statement..... 3

    2.1 Policy Rationale..... 3

    2.2 Risks to be mitigated ..... 3

    2.3 Groups Affected..... 3

3 Policy Content ..... 4

    3.1 Policy Statement..... 4

        3.1.1 Our engagement with society..... 4

        3.1.2 Our guiding principles and core value set..... 4

        3.1.3 How we drive innovation ..... 5

        3.1.4 How we act in the workplace..... 5

        3.1.5 How we conduct our business..... 6

        3.1.6 How we interact with our customers and the users of our products..... 6

        3.1.7 How we interact with media, legislators, regulators and civil society  
                organizations..... 7

        3.1.8 How we interact with shareholders ..... 8

    3.2 Roles and Responsibilities..... 9

    3.3 Implementation, Training and Control ..... 9

4 References..... 9

## **1 Executive Summary**

Envu is operating at the edge of innovation in environmental sciences. To ensure that we meet current societal expectations and create value for all stakeholders through our business activities, Envu enacts the present Internal Code of Conduct.

This Internal Code of Conduct represents our guiding principles and is the foundation of all Envu activities. What fuels this Internal Code of Conduct is our passion and determination to make a significant positive contribution to addressing some of the most pressing challenges of our time. The principles set herein are grounded in our vision of “Healthy environments for everyone, everywhere” and the Envu values “Entrepreneurial Mindset – Start with the Customer – Passion – One Team, One Dream”.

This Internal Code of Conduct comprises our values regarding innovation, our workplace, our business model and the way we interact with all stakeholders. This Policy applies across Envu and gives us guidance for our interactions with all stakeholders.

## **2 Purpose Statement**

### **2.1 Policy Rationale**

Envu is a global life sciences company that interacts with various stakeholders in countries around the world, within different legal frameworks and cultures. To support the interaction within these societies, we explored and challenged our core values and created this document to provide guidance for our employees at all levels on how we engage at Envu.

Envu wants to fully live up to its societal responsibility to be a conscientious and transparent company respected for its contribution to progress in environmental sciences.

This Internal Code of Conduct gives us guidance in all internal and external procedures and support Envu’s mission to be a company that is valued for its scientific impact, trustworthiness and transparency.

This Policy is a set of societal rules and a guiding framework to illustrate our core values.

### **2.2 Risks to be mitigated**

Failure to live up to and implement this Internal Code of Conduct can lead to severe consequences for Envu as a company. These include:

- Loss of trust and confidence for Envu of both employees and the public
- Loss of voice for Envu in public debates
- Loss of license to operate and severe negative economic consequences

By following this Internal Code of Conduct, Envu demonstrates responsibility, transparency and integrity. This is the precondition for us to build public trust and that ultimately enables us to contribute to society.

### **2.3 Groups Affected**

The Internal Code of Conduct guides our interactions with everyone – our employees,

customers, partners, public policy stakeholders, scientists, critics and our shareholders worldwide.

This Policy applies across Envu in all areas on all levels. Each employee plays an important role in implementing the Internal Code of Conduct and reflecting it towards third parties outside of Envu.

### **3 Policy Content**

#### **3.1 Policy Statement**

##### **3.1.1 Our engagement with society**

Our communities and their expectations towards businesses change over time and it is important that we adapt to meet their needs today and in the future. That is why, today, we enact our engagement policy to ensure we can meet current societal needs and create value for all our stakeholders through our business activities.

Envu is operating at the edge of innovation in environmental sciences. Never in our history has Envu's portfolio been closer aligned to our mission "Dare to Explore". Our product portfolio, position in markets, and commitment to innovation put us in a strong position to continue to make a significant positive contribution to solving some of the major challenges of our time. We are aware of the responsibility resulting from this position and strive to proactively deliver on it. We recognize that our impact is measured not only by what we have to offer but also by how we engage with society and communities around the world.

We seek to listen, understand, take concerns seriously, and respectfully engage in dialogue, especially where dialogue is hard or inconvenient. We strive to create shared value and achieve win-win situations in everything we do. We make sure our engagement with society accompanies the transformational potential of our portfolio and our talented people. We have formed the Envu Sustainability Committee, which is a diverse group of Envu employees from all functions, to advise the company on the transformation of its business and help us reach our goals.

##### **3.1.2 Our guiding principles and core value set**

We act responsibly towards our employees, customers, consumers, business partners, public policy stakeholders, scientists, critics, shareholders and to society in general. We protect the planet and the communities in which we operate.

- We contribute to ensuring the future livelihood of our planet for humans, animals and plants. We use natural resources responsibly and limit our ecological footprint.
- We stand for sustainable development and commit to doing business in an economically, ecologically and socially responsible way.

Please check our [Environment, Social & Governance / Sustainability Policy # 3.05](#) and our [Envu Sustainability Report](#) for more information.

- We contribute to the development of less developed regions of the world by increasing access to health, adhering to and raising standards, and by investing in stewardship and training.
- We support and respect human rights and leverage our sphere of influence to promote

them, inside and outside of Envu.

- We firmly believe that compliance protects our license to operate worldwide and therefore place great importance on responsible corporate governance.

### **3.1.3 How we drive innovation**

Science has always been a key driving force behind progress. That is why science is at the core of Envu's mission and why innovation and experimentation are part of our values. The problems of our times will only be solved by solutions deeply rooted in science.

- Our business success depends on a relationship with scientists based on respect, curiosity and the desire to advance scientific Envu.
- We are committed to generating and delivering solutions in the field of environmental sciences with the aim of improving peoples' lives and addressing major societal challenges.
- We are committed to discovering and developing solutions that help reduce environmental impact along the entire value chain.
- We conduct our scientific communication, including scientific publications, in accordance with current internal and relevant external legal and ethical standards.
- We are committed to communicate information on our research and development activities in an accurate, objective, and timely fashion.
- We work towards a maximum of transparency through our publication practice. We always properly reflect and disclose our participation in any scientific work and publications of others as well as the participation of others in the development of our publications. We are transparent and grant reasonable access to scientific findings.
- We promote human and animal welfare in research and development. Where animal tests are legally required, we maximize animal wellbeing and actively work towards making them obsolete.

### **3.1.4 How we act in the workplace**

Envu is a place where employees can positively change the world with their work and where they can learn and grow every day. To create value for a diverse world, we need to be a diverse and inclusive workplace that empowers people with different backgrounds and skills to make a difference. We are responsible towards our employees throughout the world and apply these standards towards the partners we work with.

- We treat each other with fairness and respect with zero tolerance for discrimination or harassment.
- We create a diverse and purposeful working environment.
- We foster a culture of trust and inclusion.
- We ensure fair compensation and equal opportunities for all our employees.

- We ensure safe and healthy work conditions.
- We develop employees based on achievements and practiced values.
- We respect diversity of thought and freedom of speech, religion and sexual orientation.
- We support community engagement based on our Envu values.

Please check our [Human Resources Policies](#) for more information.

### 3.1.5 How we conduct our business

Our products and services can contribute to transformational changes around the world. It is in that spirit we want to collaborate with our business partners along the value chain and to take accountability. Our goal is to help people and communities thrive by partnering and doing business with us.

- We compete fairly in every market, we act with integrity in all our business dealings, and we comply with all applicable laws and respect all antitrust rules.

Please check our [Antitrust Policy # 1.11](#) for more information.

- We make business decisions that are not impaired by conflicts of interest and comply with business conduct laws.

Please check our [Conflict of Interest Policy # 1.10](#) for more information.

- We undertake sound measures to prevent money laundering.

Please check our [Treasury Management Policy # 2.04](#) for more information.

- We have zero tolerance for fraud, bribery and corruption.

Please check our [Anticorruption Policy # 1.12](#) and [Antifraud Policy # 1.15](#) for more information.

- We strictly enforce rules regarding the acceptance of gifts.

Please check our [Anticorruption Policy # 1.12](#) and regional [Handling of Gifts Policies](#) for more information.

- We place great emphasis on data protection.

Please check our [Data Privacy Policy # 5.02](#) for more information.

- We protect the privacy of personal data and information.

- We protect confidential business information of our own and of third parties.

- We expect our suppliers to organize their business with Envu in line with our [Supplier Code of Conduct # 1.08](#), which sets forth key ethical, social and ecological standards, and with our [Compliance Management Policy # 1.09](#).

- We adhere to the standards set by our industry associations and it is our ambition to play a leading role in advancing standards.

### 3.1.6 How we interact with our customers and the users of our products

We act responsibly in our dealings with our customers and the users of our products.

- Where we create value, we share that value with our customers and shareholders appropriately. We provide a significant benefit at a value-based price.
- We develop safe, high-quality products and provide support for the safe application of our products in a close partnership with all who use our products and services.
- We research, develop, manufacture, and deliver products on the basis of our Quality Management System.
- We continuously review and improve the effectiveness, efficiency, and quality of our processes in order to comply with external and internal requirements, responsibilities and ethical standards.
- We inform transparently about scientifically established benefits and risks and monitor product quality performance in the market.

Please check our [Quality Management Policy # 3.03](#) for more information.

- We use responsible marketing practices.
- We respect customers' preferences.
- We empower customers to make informed choices.

### **3.1.7 How we interact with media, legislators, regulators and civil society organizations**

We seek common ground with public policy stakeholders. We listen carefully to diverse points of view and engage in thoughtful dialogue. This requires all engagements and communications be truthful and transparent.

- We support responsible regulatory proposals that improve lobby transparency in our markets.
- We do not make any donations as a company to political parties, politicians or candidates for a political office.
- We engage with NGOs with the purpose of learning and exploring common ground.
- If Envu employs former staff of public authorities, we respect their obligation to abide by the rules and confidentiality requirements which apply to them.
- We respect the privacy of all stakeholders with whom we identify and interact.
- As an active member of trade associations, we advocate for these organizations to adopt a code of conduct for responsible lobbying.
- We seek to contribute to bi- and multi-partisan initiatives and greater consensus by reaching across the aisle.
- We provide transparency about our lobby spending.

We respect the independence of journalists and media representatives and seek to be transparent and fact-based in our interactions.

- We engage openly and transparently with journalists and media representatives and provide accurate information.
- We do not generate or distribute fake news.
- We do not provide any kind of non-transparent sponsorships for grassroots movements. We are transparent if others interact for us with media.
- We hold all public relations agencies accountable to our standards when they work for us.

Regulators play a key role in protecting the common good. They make decisions based on both sufficient scientific evidence and political goals. Envu wants to contribute to good decisions by being transparent about its interactions with regulators and about the data we provide to the decision-making process.

- We work to ensure product safety in order to protect people and the environment.  
Please check our [Product Safety Policy # 3.02](#) for more information.
- We collect and report Health, Safety and Environment (HSE) performance data in order to accurately map our footprint.  
Please check our [Occupational Health & Safety Policy # 3.01](#) for more information.
- We are transparent about safety data in the regulatory approval process.
- We are committed to supporting regulatory goals through co-regulation and self-regulation.
- We engage in a timely and transparent manner if new findings raise questions on existing approvals.
- We support global convergence of regulatory standards in the spirit of raising the bar for all.

### 3.1.8 How we interact with shareholders

We recognize the expectations of our shareholders to create long-term value in society whilst delivering business results in line with our promises. 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 create sustainable value for our shareholders by relentlessly focusing on solving some of the world's most pressing problems.
- We ensure transparency about the impact of our value chain.
- We inform capital markets with correct and appropriate information in a timely manner.
- We protect corporate assets.
- We conduct responsible risk management.

Please check our [Risk Management Policy # 1.03](#) for more information

- We measure key non-financial indicators with the same rigor as financial indicators.



- We take into account both financial and non-financial indicators for performance evaluation and decisions on compensation.

### **3.2 Roles and Responsibilities**

Throughout Envu, it is the task of each individual employee and of Envu as a whole to behave in accordance with this Internal Code of Conduct. All employees have the important role of ambassadors of the Internal Code of Conduct.

### **3.3 Implementation, Training and Control**

The Envu Leadership Team, in cooperation with Legal & Compliance, Human Resources and Risk Management functional leaders, is responsible for the implementation of this Policy. Its execution will be driven by the senior management in regions and countries at all Envu locations. The content of this Policy shall be communicated to all employees by the leadership team of every department and country.

This Policy is available in the official Envu language which is English. Translations into other languages are the responsibility of the respective countries.

## **4 References**

[Anticorruption Policy # 1.12](#)

[Antifraud Policy # 1.15](#)

[Antitrust Policy # 1.11](#)

[Compliance Management Policy # 1.09](#)

[Conflict of Interest Policy # 1.10](#)

[Data Privacy Policy # 5.02](#)

[Environment, Social & Governance / Sustainability Policy # 3.05](#)

[Envu Sustainability Report](#)

[Fairness & Respect at Work Policy # 1.11](#)

[Handling of Gifts Policies](#)

[Human Resources Policies](#)

[Occupational Health & Safety Policy # 3.01](#)

[Product Safety Policy # 3.02](#)

[Quality Management Policy # 3.03](#)

[Risk Management Policy # 1.03](#)

[Supplier Code of Conduct # 1.08](#)

[Treasury Management Policy # 2.04](#)