



ANTI-CORRUPTION CODE OF CONDUCT

Our Commitment to Integrity in Business Conduct

Combating corruption is a matter of course for the Hermès Group and forms part of an ethical approach to which the Hermès Group is deeply committed. It entails a firm commitment to strictly comply with the laws and regulations applicable in all countries where the Group operates.

Combating corruption means prohibiting any behavior that violates the Group's internal policies and procedures, and promoting an ethical culture within the company where breaches of integrity have no place.

Combating corruption therefore entails integrating this ethical culture into all of the Group's policies, actions, and decisions. Because ethics is everyone's responsibility, these principles must permeate the Hermès Group's daily practices, whether managerial, commercial, or operational.

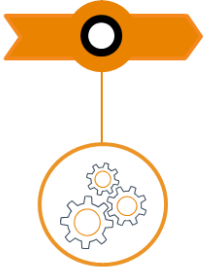
This Anti-Corruption Code of Conduct (the "Code of Conduct") builds on the Hermès Group's existing commitments to ethics and integrity. It reflects the personal commitment of senior management and is an integral part of the values and principles shared by all Hermès Group employees.

Axel Dumas
Managing Director of Hermès International

How can we prevent corruption risks within the Group?

Identifying risks

This Code of Conduct, along with all the procedures implemented by the Hermès Group, provides the necessary tools to identify risky situations.



Act ethically

Everyone must apply and ensure compliance with the rules applicable to all Hermès Group employees. Support is available at all times.



Everyone must be familiar with all the rules established by the Hermès Group regarding ethics and compliance (gifts and invitations, conflicts of interest, etc.).

Knowing the rules

Key Principles

It is strictly prohibited to give or receive any form of undue advantage.

If you encounter practices that violate our rules, contact the designated representatives.

Relationships with Third Parties

In any dealings with a third party, you must:

- Comply with the rules governing gifts or invitations received or given.
- Ensure compliance with our rules and values by following the established selection and monitoring procedures,
- Verify that their assignments and compensation are always properly managed.

Relations with public officials

The definition of a public official varies by country. If you have any doubts or questions, contact the designated representatives.

Gifts, invitations, or any other unjustified benefits of any kind, particularly so-called "facilitation" payments, are strictly prohibited when dealing with public officials.

Other rules to follow

All of the Hermès Group's rules and procedures regarding ethics and compliance must be followed.

There are also other relevant rules regarding:

- corporate philanthropy,
- prevention of conflicts of interest,
- lobbying and advocacy.

In all cases, everyone must demonstrate transparency and integrity.

Transparency

Integrity

If you have any doubts, questions, or concerns, please contact:

- Human Resources;
- Your direct or indirect supervisor;
- A member of the Group Ethics Committee.

The Hermès Group has also established a professional whistleblowing system called “H-Alert!” designed to report ethical and compliance violations encountered by employees and stakeholders.

The scope and operating procedures of the system are outlined in the H-Alert! Information Notice, available on the Group’s intranet and on the internet.

For further details, please refer to Section 3 of this Code of Conduct.

Any violation of the Code of Conduct may result in disciplinary action and may also result in personal, civil, or criminal liability.

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Why Fight Corruption

Our values

Integrity and ethics have been two of the Hermès Group's core and founding values since 1837.

The Hermès Group is strengthening its anti-corruption policy primarily because corruption runs counter to its values.

The fight against corruption is essential to maintaining healthy and lasting relationships with our suppliers, long-standing partners, and customers. Everyone expects us to be beyond reproach. Integrity and ethics are thus the foundation of our shared identity.

A legal obligation for the company

Preventing and detecting acts of corruption and, more generally, breaches of integrity is a legal obligation.

Acts of corruption are criminal offenses punishable under the laws of the countries where we operate. Anyone who commits prohibited acts may be held personally liable, as well as the Hermès Group. Furthermore, the Group will not tolerate its reputation being tarnished by the conduct of unscrupulous employees or partners.

Furthermore, an increasing number of countries require companies to implement a set of internal procedures designed to effectively combat corruption. Accordingly, in accordance with the "Sapin II" law adopted in France in December 2016, the Hermès Group has implemented specific measures designed to prevent and detect breaches of integrity.

The Purpose and Scope of the Code of Conduct

The Code of Conduct reflects the Group's commitment to pursuing and expanding a clear, effective, and uncompromising approach to combating corruption.

This Code of Conduct serves as a guide for employees and stakeholders in their daily activities. It precisely defines behaviors that constitute acts of corruption and helps identify problematic situations through examples and explanations drawn from the specific characteristics of the Group and its business lines.

This Code of Conduct also provides, for each identified situation, the necessary information for anyone facing such a situation to enable them to act appropriately, in compliance with the law, the Group's internal policies, and its values. The goal is that, upon reading it, everyone understands the nature of the risk of corruption and the penalties associated with it (1.), knows how to respond in sensitive situations (2.), and is aware of the contacts and tools available to advise and assist them (3.).

This Code of Conduct is global in scope and applies to all internal stakeholders (employees, corporate officers, etc.) and external stakeholders (partners, subcontractors, suppliers, service providers, etc.).

The Hermès Group expects everyone to behave in accordance with the principles set forth herein, under all circumstances, regardless of your position, your entity, your workplace, your level of responsibility, or the people with whom you interact.

In the event of any conflict between the principles set forth in this Code of Conduct and rules adopted at the local level, the stricter rule shall apply.

The Code of Conduct therefore relies on everyone’s vigilance, not only regarding themselves but also regarding the people around them and the situations to which they are, directly or indirectly, exposed.



1. Understanding the Risk of Corruption

Corruption refers to the act of offering, promising, giving, or proposing an improper benefit (money, a gift, or a service or promise) to a person so that they will perform or refrain from performing an act within the scope of their duties or in violation of their obligations. Soliciting or receiving any benefit under these same conditions is also prohibited.

Regardless of its value, any gift must be viewed as a potential risk that, depending on the circumstances, may give the impression that an undue advantage is being sought or offered in exchange for, for example, a favorable action or decision. Vigilance must therefore be constant, and it is essential to understand the prohibitions.

1.1 Acts Constituting Breaches of Integrity

Corruption and influence peddling by public officials

A public official is a person vested with public authority, entrusted with a public service mission, or holding an elected public office.

- This includes public officials of the country in question or those working on behalf of a foreign state or a public international organization (for example, customs officials, competition, consumer protection, and fraud enforcement officials, officials managing building permits, European Union civil servants, and, generally, civil servants, law enforcement officers, public and ministerial officers, members of parliament, all local elected officials, etc.).
- The definition of a public official varies by country. In case of doubt, you should consult the legal department or assume that the person is a public official.

French law distinguishes between two offenses: **corruption** and **influence peddling**.

- **Corruption of a public official** is characterized by the act of any person, at any time, directly or indirectly, making unjustified offers, promises, gifts, presents, or benefits of any kind to a public official, for themselves or for another person (or yielding to a solicitation from such a person), so that they perform or refrain from performing, or because they have performed or refrained from performing, an act within the scope of their official duties, mission, or mandate, or facilitated by their official duties, mission, or mandate.
Soliciting or accepting an unjustified benefit under these conditions also constitutes corruption.
- **Influence peddling by a public official** is characterized by the act, by any person, of unjustifiably offering at any time, directly or indirectly, offers, promises, gifts, presents, or any benefits whatsoever to a public official, for himself or for another (or of yielding to a solicitation by such a person), so that, they abuse, or because they have abused, their influence—whether real or supposed—with a view to obtaining from a public authority or administration honors, jobs, contracts, or any other favorable decision.
Soliciting or accepting an unjustified benefit under these circumstances also constitutes influence peddling.

Such conduct, which is prohibited by law, is strictly forbidden by the Hermès Group.

Illustration 1 – Bribery of a Public Official

A sum of money or an iconic product (e.g., a *Kelly bag*, a *Birkin bag*, etc.) is offered to a public official and/or a relative of the official in connection with the opening, expansion, or renovation of a facility (a store, a factory, etc.) in order, for example, to facilitate administrative procedures (such as permits or operating licenses).

The acts would be just as reprehensible if the money or item were offered after the authorizations had been obtained, as a token of gratitude.

Illustration 2 - Influence peddling by a public official

In a situation similar to the one just described, the sum of money or the symbolic gift is offered to a public official so that he or she will advocate for a project with superiors and thereby facilitate the administrative procedures.

In such cases, influence peddling is established regardless of whether the official has actual influence over the decision.

Corruption or influence peddling between private individuals

Corruption and influence peddling are also prohibited by French law between private individuals, that is, between any natural or legal persons engaged in a business activity, regardless of their status, hierarchical level, nationality, or country of operation.

- **Corruption between private individuals** is characterized by the act of any person, at any time, directly or indirectly, making unjustified offers, promises, gifts, presents, or benefits of any kind to a private individual, for themselves or for another person (or yielding to a solicitation from that person), so that they perform or refrain from performing, or because they have performed or refrained from performing, an act within the scope of their activity or function, or facilitated by their activity or function, in violation of their legal, contractual, or professional obligations.
Soliciting or accepting an unjustified benefit under these conditions also constitutes corruption.
- **Influence peddling between private individuals** is characterized by the act of any person unjustifiably offering, at any time, directly or indirectly, offers, promises, gifts, presents, or benefits of any kind to another private individual (or to yield to a solicitation from that person) so that the latter may abuse, or because the latter has abused, their actual or supposed influence with a view to obtaining from a public authority or administration honors, employment, contracts, or any other favorable decision.
Soliciting or accepting an undue advantage under these circumstances also constitutes influence peddling.

This behavior is prohibited by the laws of most countries, sometimes under the same “general” offense of corruption. In all cases, it is strictly prohibited by the Hermès Group.

Illustration 1 - Corruption between private individuals

- Examples of active corruption:
 - To ensure the successful execution of high-profile events (in-store events, product launches, Saut Hermès, fashion shows, etc.), a sum of money, an iconic product, or a specific benefit is offered to a local partner to expedite or facilitate the necessary procedures.
 - Granting a benefit to an external service provider so that they are less strict regarding safety guidelines.
- Examples of passive corruption:
 - An employee agrees to disclose information or expertise obtained in the course of their duties in exchange for a sum of money, gifts, or any other service (a free internship for their children, invitations to sporting events, etc.).
 - A supplier convinces an employee to use their overpriced services, circumventing purchasing rules and procedures, in exchange for a sum of money corresponding to a portion of the overcharged amounts.

Illustration 2 - Influence peddling between private individuals

To ensure the successful execution of high-profile events (in-store events, product launches, Saut Hermès, fashion shows, etc.), a sum of money, an iconic product, or a special benefit is offered to a local partner, who claims to be able to intercede with the authorities to facilitate the relevant administrative procedures.

Group Rules

Such conduct is **strictly prohibited** under all circumstances and for any reason whatsoever.

In the event of a solicitation, uncertainty regarding the procedure to follow, or a confirmed or suspected irregularity, you must **categorically refuse the proposal** and:

- either use the Group’s whistleblowing system;
- or contact one of the designated contacts listed in Section 3.3 of this Code of Conduct.

1.2 Penalties

Under French law, all persons involved in the aforementioned conduct are subject to criminal penalties.

Under French law, individuals found guilty of corruption and influence peddling involving public officials face a sentence of up to 10 years' imprisonment and a fine of up to 1 million euros, or even up to twice the proceeds of the offense.

Corruption and influence peddling between private individuals are offenses punishable by up to 5 years' imprisonment and a fine of up to 500,000 euros, or even up to twice the proceeds of the offense.

The Hermès Group, as a legal entity, may also be held criminally liable for such conduct. It may then face fines five times the amount prescribed for individuals, or even ten times the proceeds of the offense, in addition to a number of additional penalties (closure of facilities, exclusion from certain markets, etc.).

Such conduct is prohibited and sanctioned by the Hermès Group worldwide. **Thus, these prohibitions apply even if one of the acts described in this Code of Conduct is not punishable under the local law of a given country.**

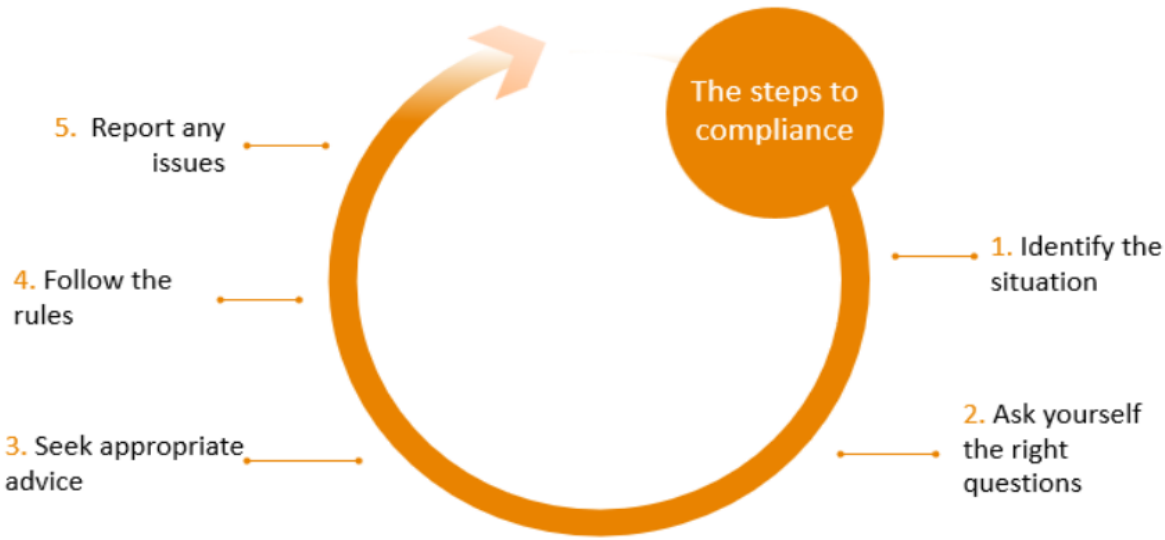
The Hermès Group does not tolerate any of the behaviors prohibited in this Code of Conduct, starting, of course, with acts constituting a criminal offense, but also including acts that violate the values and principles to which the Group is committed in its anti-corruption efforts.

Under these circumstances, any violation of the Code of Conduct may result in disciplinary action, up to and including termination of employment. These sanctions and their procedures are set forth and described in the internal regulations.

2. Knowing How to Respond in Sensitive Situations

This section of the Code of Conduct describes a number of sensitive situations in terms of corruption risk.

These situations must be handled according to the following guidelines:



The points below therefore constitute areas where the Hermès Group calls for heightened vigilance, emphasizing the importance of adhering to both the letter and the spirit of the procedures outlined.

2.1 Rules regarding gifts and invitations

Situations involving the exchange of gifts or invitations are particularly sensitive: it is imperative to prevent gifts and invitations from being used inappropriately in violation of applicable anti-corruption rules.

The Hermès Group has adopted guidelines that apply to any gift or invitation offered or extended in the context of business relationships.

Definition

A **gift** or **invitation**, as the case may be, is any good, service, or benefit of any kind offered, promised, given, or received, directly or indirectly, whether of monetary value or not.

This includes, for example, sums of money, gifts, loans, club memberships, the right to use equipment, job offers, discounts, as well as any other form of hospitality, such as invitations or the coverage of expenses, meals, beverages, travel and accommodation costs, tickets to a sporting or cultural event, invitations to a launch event, or any other promotional activity in the context of business relations, etc., whether offered at points of sale, at headquarters, or at any location outside the Hermès Group's premises, including employees' homes.

Is the gift being given to a public official?

Is the gift given without any ulterior motive and unrelated to a specific transaction?

Is the gift of a reasonable value?

Is the gift given in a transparent manner?

There are several situations in which a gift or invitation may be received and/or offered.

- **Gifts offered by customers, particularly in-store:**
 - A customer offers a box of chocolates.
 - A customer offers a sum of money or an item of value.
 - A customer uses their network or influence to benefit an employee.
 - A customer who owns a hotel offers a weekend stay at their establishment or proposes to upgrade an existing reservation.
- **Gifts and invitations offered by suppliers**, particularly to their regular contacts within the Hermès Group, or by prospective clients, with the aim of securing a contract.
- **Gifts and invitations offered by employees to partners:** an invitation to a launch party, a gift to a journalist.

Key Principles

It is strictly prohibited to request, accept, offer, or provide gifts and invitations of any kind for the purpose of inducing or rewarding conduct that is improper or that would otherwise violate applicable anti-corruption rules or internal procedures on the matter.

This prohibition extends to any situation that could be perceived as likely to influence the judgment or decision of the recipient of the gift or invitation.

General Rules of the Group'

As a matter of principle, no employee shall offer to a third party (such as a customer, supplier, service provider, intermediary, partner, public official, or politically exposed person [PEP], etc.)

or accept from such a party any remuneration, gift, invitation, trip, or any other benefit, etc.

In the context of the Group's business activities, gifts and invitations are exceptionally permitted if:

- are of low value (excluding cash, checks, and gift cards, which are never accepted);
- are in line with local business customs and accepted or offered in accordance with the Group's principles of disclosure and transparency;
- comply with local regulations;
- are accepted or offered, as the case may be, on behalf of the Hermès Group, and disclosed in accordance with applicable rules;
- remain within a reasonable amount per recipient, individually and per year.

Furthermore:

- Gifts and invitations offered to a public official or a PPE may only be authorized in particularly exceptional circumstances, for fully justified cases, by the line manager, and must be reported in advance to the Executive Management and the Chief Compliance Officer.
- Gifts and invitations offered to a private individual must be authorized by the line manager.
- Gifts and invitations offered to a person related to the business partner in question (e.g., a spouse, a family member, etc.) must be authorized by the immediate supervisor and must be reported in advance to senior management.
- Gifts and invitations offered or received during a particularly sensitive period (for example, during the negotiation of a major contract, or at prestigious and/or high-profile events) are strictly prohibited.

Finally:

- Employees must never solicit, receive, or offer gifts or invitations of any value in exchange for a service of any kind or in exchange for a product.
- Employees must never solicit, receive, or offer gifts or invitations that could impair the recipient's judgment or compromise their independence.
- If there is any doubt, it is necessary to discuss the matter with colleagues, supervisors, or the Human Resources Department.

Local Rules

Each employee must comply with any more restrictive internal rules defined, where applicable, for their unit, department, or business line, which pertain in particular to:

- the nature and value of permitted gifts (e.g., perishable goods below a specified threshold);

- the process for reporting gifts received (e.g., informing and/or obtaining authorization from a supervisor, completing a written declaration signed by the recipient, maintaining a registry for gifts received above a certain threshold, etc.);
- the procedures for distributing gifts received (e.g., sharing perishable food items among teams, donating to a charity, etc.).

You must use common sense to determine what would be unacceptable or inappropriate, even if it complies with the above rules.

In case of doubt regarding the procedure to follow, or in the event of a confirmed or suspected irregularity, you should:

- either use the Group’s whistleblowing system;
- or contact one of the designated contacts listed in Section 3.3 of this Code of Conduct.



2.2 Selection and Monitoring of Partners

The Hermès Group works with numerous partners and maintains a wide range of relationships with various suppliers, intermediaries, representatives, or agents of end customers.

While each employee is responsible for their own actions, they may also be affected by the conduct of the partners with whom they interact in the course of business dealings.

Indeed, in these relationships, several high-risk situations may arise.

Is this partner trustworthy?

Is this partner transparent about their methods?

Does this partner provide me with regular updates on their activities?

Does this partner receive reasonable compensation?

Examples - Business relationships with a corrupt third party

- **If you do not verify** a prospective partner's practices, values, reputation, or background before entering into a business relationship with them, that relationship may expose the Hermès Group to significant legal risk. This may be the case, for example, if this person resorts to acts of corruption to carry out their duties, diverts funds received toward illicit activities, is known for unethical behavior, etc.
- **The lack of supervision and monitoring of** an intermediary's (dealer, distributor, agent, business introducer, etc.) **activities** may create a risk that this intermediary will commit illegal acts, particularly acts of corruption.

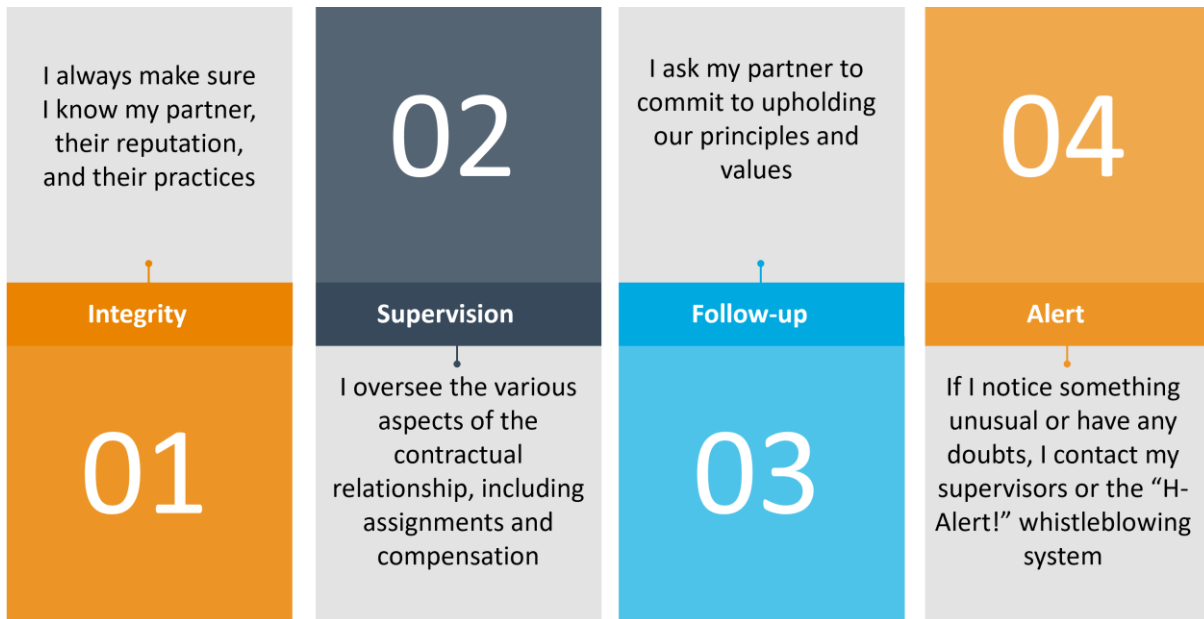
Group Rules

In all cases, for any business relationship with a third party, a number of principles and precautions must be observed:

- When selecting any partner, it is imperative to conduct the necessary due diligence to ensure their integrity.
- The contractual relationship must be clearly and adequately defined; this involves, upfront, a precise definition of the tasks assigned, the resources allocated, the terms of compensation, and its appropriateness.
- It is essential to ensure, through contractual agreements, that third parties commit to upholding our principles and values. For this reason, our contracts with third parties must include anti-corruption provisions designed to ensure compliance with the rules and principles set forth in this Code of Conduct.
- Finally, monitoring must be ensured throughout the duration of the relationship or the duration of the assignment.

In case of doubt regarding the procedure to follow, or in the event of a confirmed or suspected irregularity, you should:

- either use the Group's whistleblowing system;
- or contact one of the designated contacts listed in Section 3.3 of this Code of Conduct.



2.3 Relations with Public Officials

In the course of its activities, the Hermès Group and/or its representatives may be required to interact with public officials and authorities in various countries, where customs and rules of conduct may vary.

The definition of a public official varies by country. If there is any doubt regarding the role of a contact person or an authority, it is recommended to assume that they are a public official or a public authority, or to consult one of the designated contacts listed in Section 3.3 of this Code of Conduct.

Relationships with public officials, by virtue of their positions, require extreme vigilance. This applies in particular, but is not limited to, the practice known as “facilitation payments,” which constitute acts of corruption in France as well as in most countries where the Hermès Group operates and which are in any case strictly prohibited by the Group.

As a general rule, any gift, offer, or promise to a public official is prohibited, except in exceptional cases, in accordance with the rules set forth in Section 2.1 above.

Definition

The term “**facilitation** payments” is sometimes used to refer to small payments intended to facilitate or expedite the performance by public officials of “routine” procedures or acts.

Is the relationship with the public official transparent?

Is the relationship with the public official justified and necessary?

Is the public official acting lawfully?

Is the public official asking for something in return?

Example - Facilitation Payments

As part of the import or export procedures for Hermès Group products in certain foreign countries, these products may be subject to customs inspections of varying degrees of intensity.

In this context, a customs official might solicit small sums of money to expedite the standard customs process (for example, faster release of goods).

This behavior is not permissible as it would constitute an act of corruption. Further examples are provided in Section 1.1 regarding the definition of corruption and influence peddling offenses.

Group Rules

You must absolutely **refuse any solicitation**. In the event that such a refusal results in an inappropriate reaction from the officers involved, it is important to:

- either use the Group's professional alert system;
- or to contact one of the designated contacts listed in Section 3.3 of this Code of Conduct.



2.4 Rules Regarding Representation of Interests

Definition

Advocacy refers to a situation where an employee or an organization has as its primary or regular activity the seeking to influence public decision-making. This activity may concern the content of a law or a regulatory act, by communicating with, in particular, certain public officials or administrative authorities, a member of the Government or a ministerial cabinet, a member of Parliament, or any other person holding an elected public office.

So-called lobbying activities fall under the category of interest representation. In this regard, French law requires that such relationships be conducted transparently. Indeed, the representation of interests is not without risk, particularly if it were to result, for example, in the granting of an undue advantage to a public official by an interest representative in order to influence the actions of public authorities in a manner favorable to the interests they represent.

This requirement for transparency is one of our group's core values. If your actions involve lobbying, it is your responsibility to strictly comply with the relevant legal obligations.

If you have any doubts about the procedure to follow, or if there is a confirmed or suspected irregularity, you should:

- either use the Group's whistleblowing system;
- or contact one of the designated contacts listed in Section 3.3 of this Code of Conduct.

2.5 Sponsorship Activities

Definitions

- **Sponsorship** refers to material support provided, without direct compensation from the beneficiary, to a cause or an individual for the pursuit of activities of general interest.
- Philanthropy differs from **sponsorship**, which involves providing material support to an event, a person, a product, or an organization with the aim of deriving a direct benefit.

Is this a project of public interest?

Who is the actual beneficiary of the project?

Is my contact truly acting in good faith?

Does my contact assure me that the project will be monitored?

The Hermès Group is particularly committed to philanthropic activities around the world. These activities are organized either by the Hermès Corporate Foundation or by the Group’s various entities.

Every effort must be made to ensure that channels dedicated to philanthropy are not misused for illicit purposes.

Illustration - Misuse of funds allocated to corporate philanthropy

- A corporate philanthropy initiative benefiting a local community that is simultaneously processing a building permit application for a major Group project.
- Use of funds allocated to corporate philanthropy, via the Foundation or commercial entities, for the benefit of an association linked to a Group stakeholder (such as a supplier, employee, or shareholder), or having a fictitious purpose, or serving as an intermediary for the financing of other activities.

Group Rules

- Decisions regarding sponsorship activities must be made collectively.
- Philanthropic initiatives must demonstrate the highest degree of transparency, particularly financial transparency.
- Sponsorship activities must be subject to a clear decision-making process that includes the necessary due diligence to ensure the legality of the activity in advance.
- Sponsorship activities must be subject to regular monitoring and follow-up to ensure the proper execution of the activity.

In case of doubt regarding the procedure to follow, or in the event of a confirmed or suspected irregularity, you should:

- either use the Group’s whistleblowing system;
- or contact one of the designated contacts listed in Section 3.3 of this Code of Conduct.

2.6 Prevention of Conflicts of Interests

Definition

A **conflict of interest** arises from a situation in which a person employed by a private or public organization has, in a private capacity (or in the context of separate professional activities), interests that could influence or appear to influence the manner in which they perform the duties and responsibilities entrusted to them by that organization.

Do I have a personal stake in the situation?

Would the same decision be made without this personal interest?

Have I reported the situation in accordance with applicable rules?

Has the conflict of interest been resolved?

Illustration - Conflict of Interest

- The act of any person prioritizing their personal interests or those of shareholders, employees, relatives, or third parties, **to the detriment of the Group's interests.**
- The fact that a person responsible for selecting a service provider has a personal connection with a service provider likely to carry out the assignment may influence their choice and create **a risk of improper awarding of the contract.**
- When a person responsible for recruitment has a personal connection with a candidate, this creates **a risk that the recruitment process will be biased.**

To be addressed, a conflict of interest must be disclosed.

An unaddressed conflict of interest may lead to undue favoritism toward the personal interests of shareholders or employees, to the detriment of the group's interests.

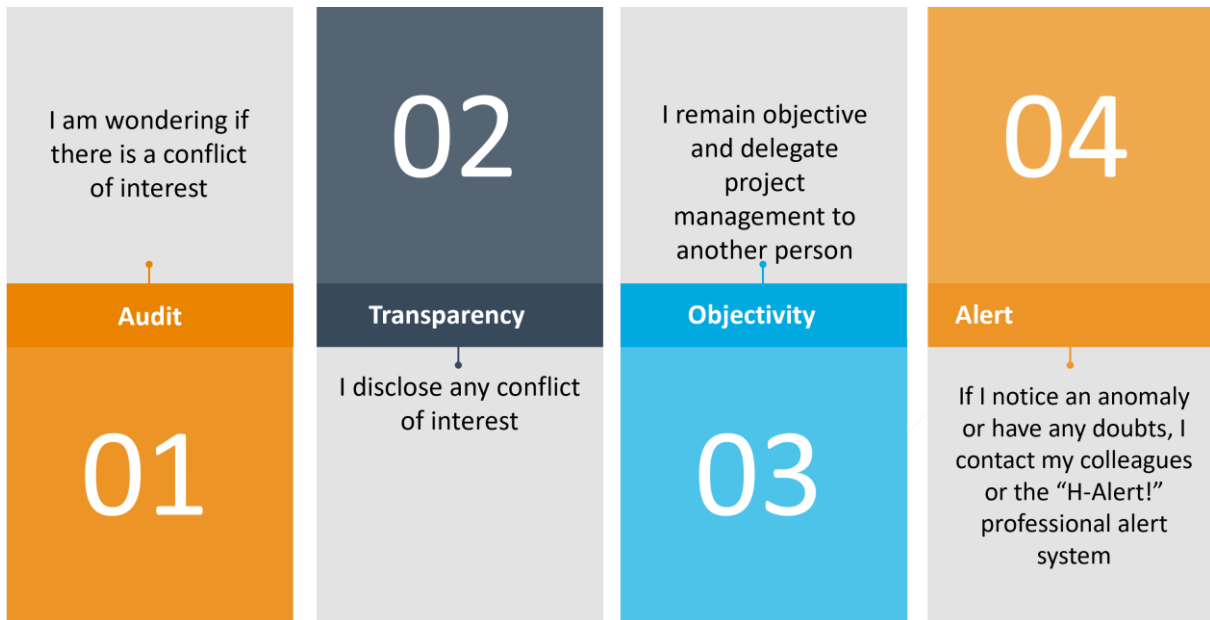
Group Rules

Any conflict of interest must be addressed. Thus:

- The general principle of transparency must be systematically applied. Even if such a situation is not prohibited in itself, it is important that it be disclosed and made known to prevent any risk of compromising integrity.
- Any actual or potential conflict of interest must be disclosed to your supervisor. Depending on the circumstances, your supervisor may ask you to recuse yourself from handling the situation in question and, if necessary, will designate the person to whom its management should be entrusted.
- If the employee, for personal reasons, does not wish to disclose the nature of the conflict, they must still report that the situation places them in a conflict of interest and must, consequently, recuse themselves from the task involved in the conflict.

In case of doubt regarding the procedure to follow, or in the event of a confirmed or suspected irregularity, you should:

- either use the Group's whistleblowing system;
- or contact one of the designated contacts listed in Section 3.3 of this Code of Conduct.



2.7 Confidential Information

Definition

Confidential information is information that belongs to the group and **is not disclosed to the public**, or access to which is restricted to a limited number of people. Such information may include:

- know-how;
- future products (collection plans/briefs, launch dates, specifications, current or upcoming development) and plans to open new locations;
- data relating to our customers, suppliers, or service providers;
- financial or commercial data;
- data enabling the identification of key employees or decision-makers;
- plans for acquisitions, divestitures, or equity investments in other companies, or any other non-equity partnerships;
- etc.

Employees have access to information that may be confidential. It is essential to ensure that such information is not disclosed outside the professional context. Any unauthorized disclosure of confidential data may expose the Group to significant risks, including legal, reputational, and

financial risks. Addressing a leak of confidential information requires a rapid, structured, and coordinated response.

Any proposal or solicitation aimed at obtaining non-public information about Hermès in exchange for a benefit of any kind (sum of money, invitation, gift, etc.) constitutes an act of corruption and may result in criminal prosecution.

What is the nature of the information requested?	Illustration – Bribery for the Disclosure of Confidential Information <ul style="list-style-type: none">▪ Being approached by a third party to obtain prototypes or models in exchange for compensation.▪ Being contacted by someone on a social media platform (e.g., LinkedIn, WhatsApp, etc.) for an interview about your work in exchange for compensation.▪ Being approached by someone posing as a student to learn the company’s perspective on a topic in exchange for an invitation or gift cards.▪ Being approached by a recruitment firm and realizing during the interview that the goal is to gain access to the group’s expertise.
Does this person have the right or authority to access this information?	
Is there a quid pro quo in exchange for this information?	
Am I comfortable with this request?	

Group Policies

- All employment contracts or internship agreements for Group employees (permanent, fixed-term, work-study students, interns) contain confidentiality clauses.
- Any request for a testimonial, training session, or conference from an external party (journalist, school, etc.) must be submitted as a request to the Executive Committee of the relevant department.
- Strictly maintain the confidentiality of internal documents and do not share any documents, data, or confidential information, even in part. Do not use informal channels such as text messages or private messaging apps for any confidential communication.
- Any request for compensation of any kind in exchange for information concerning Hermès must be refused immediately and firmly.
- Document the facts (date, location, individuals involved, nature of the request) and retain all evidence.
- Follow the Lock cybersecurity awareness program.

If you are unsure of the procedure to follow, or if there is a confirmed or suspected irregularity, you should:

- either notify your entity’s internal audit department and provide them with the evidence;
- either use the Group’s whistleblowing mechanism; or
- or contact one of the designated contacts listed in Section 3.3 of this Code of Conduct.



3. Know Your Contacts and Master the Prevention Tools

3.1 The “H-Alert!” internal whistleblowing system

The Hermès Group has established a whistleblowing system called “H-Alert!” that is accessible to all Group stakeholders, both internal and external.

All employees may report behaviors or situations that may violate this Code of Conduct and bring them to the attention of:

- their direct or indirect supervisor, Human Resources, or a member of the Ethics Committee;
- the provider of the whistleblowing system designated by Hermès to receive reports, whose contact information is available on the Group’s intranet (Our Ethics / H-Alert!).

Any stakeholder may report behavior or situations that may violate this Code of Conduct via the H-Alert! system.

The scope and operating procedures of the system are outlined in the H-Alert! Information Guide, available on the intranet and on the internet.

3.2 A Policy of Transparency and Guidance

Achieving the Group’s anti-corruption objectives requires the determined commitment of everyone.

Daily discussion, exchange, and mutual support are essential to enable you to act in the best possible way, and numerous tools are available to you for this purpose.

The intranet and the Group’s publicly accessible documentation centralize all internal guides and policies designed to clarify or supplement the rules and principles described in the Code of Conduct. These resources, which are regularly updated and expanded, are available to everyone to provide the analysis and information necessary for the practical adherence to the Group’s rules and values.

In case of difficulty or doubt, the Hermès Group encourages all employees and/or stakeholders to contact the individuals listed below as often as necessary.

3.3 Who to Contact

For employees, reports may be submitted to a direct or indirect supervisor. They are the primary point of contact for answering questions or, if necessary, referring them to someone better informed.

For external stakeholders, reports can be made to your usual contact within the Hermès Group.

In situations where it is not possible to speak with a supervisor or your point of contact, or if they are unable to provide a response, Human Resources or members of the Hermès Group

Ethics Committee¹ are also available to address any issues covered in this Code of Conduct. They handle all matters brought to their attention confidentially.

To identify the appropriate contact, the Group’s organizational chart can be consulted on the HermèsSphère intranet site.



¹ The members of the Ethics Committee are: the Chief Executive Officer of Governance and Organizational Development, the Group Human Resources Director, the Retail Human Resources Director, the Group General Counsel, the Group Director of Social Development, and the Compliance General Counsel.