

*LVMH Group*  
*Alert Policy*

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# *1. Purpose of the Alert Policy*

The LVMH Group is committed to complying with all applicable laws and regulations and to conducting its business on the basis of the values and rules set out in the LVMH Code of Conduct and the internal guidelines, principles and policies of the Group.

In the event of a conflict between the provisions of this Alert Policy and any applicable local laws, the local laws shall prevail.

The LVMH Group encourages open communication and dialogue. All employees and external stakeholders are invited to ask for guidance, or to report, in good faith, existing or reasonably suspected ethical breaches of which they become aware (a “**Report**”).

The purpose of this Alert Policy is to describe how concerns should be reported and how they should be addressed within the LVMH Group.

## *2. Reporting channels*

Reports can be made through either the local reporting channels (section 2.1.) or the LVMH Alert Line (section 2.2.).

### **2.1. Local reporting channels**

Reports should be made, within the Maison or Entity:

- either to the **Human Resources**,
- or to the **Ethics & Compliance Correspondent**.

Employees can always seek advice and discuss their concerns with their direct or indirect line manager. In cases where it appears from such exchange that the concern may fall within the scope of this policy, the manager must encourage the employee to make a Report **to the abovementioned persons**.

Any other member of the personnel who would happen to receive a Report must **transfer it as soon as possible** to the **Ethics & Compliance Correspondent**.

### **2.2. LVMH Alert Line**

Reports can also be made by using the “**LVMH Alert Line**”, the online interface implemented by the LVMH Group at worldwide level.

The LVMH Alert Line can be accessed directly at <https://alertline.lvmh.com> and from the LVMH website.

This interface offers a fully confidential and secure way to report ethical concerns related to the LVMH Group and to exchange information through a secured postbox. It also allows the author of a Report to file a Report anonymously (if they wish so).

The LVMH Alert Line is hosted and operated by an external service provider specialized in the processing of alerts, whose servers are located within the European Union and which is bound by strong confidentiality and security commitments. The external service provider's employees are not involved in the processing of Reports and do not have access to the information exchanged via the interface.

## ***3. Key steps of the reporting process***

### **3.1. Submission of the Report**

#### ***3.1.1. Possibility to submit an anonymous Report***

A Report may be made anonymously. However, authors of a Report are **encouraged to identify themselves** since anonymity may make the investigation process more complex.

- Authors of anonymous Reports are encouraged to **provide contact details** (such as an alias email or through the secured postbox provided by the LVMH Alert Line) in order to enable the exchange of information. Otherwise, the author of the Report will not be able to be informed on the progress of the evaluation of their Report.

#### ***3.1.2. Content and supporting documents***

Authors of a Report should describe the facts they are reporting as clearly as possible, providing complete and precise information and documents to facilitate the processing of their Report, it being noted that such information/documents may be used for the purpose of the investigation.

- Authors of a Report can communicate documents, files and information at any stage of the evaluation process.
- Not providing enough information may result in some delay in processing the Report.

The Report should not provide details about the private life of anyone or personal appreciation, unless strictly necessary and relevant.

## 3.2. Acknowledgement of receipt

When the Report is received through **local reporting channels**, the **person receiving the Report** (Ethics & Compliance Correspondent or Human Resources) will send to the author of the Report a **written acknowledgement of receipt within seven (7) working days** of submission of the Report, unless no contact information or means of contact has been provided.

When the **LVMH Alert Line** is used, the **Group’s Ethics & Compliance Department** will send the **written acknowledgement of receipt** as described above.

Acknowledgement of receipt of the Report **does not imply it is admissible** (see section 3.4.).

## 3.3. Assignment of the Report

### *3.3.1. Coordinator responsible for handling the Report*

When the Report is received through **local reporting channels**, the Ethics & Compliance Correspondent is the “**Coordinator**” responsible for evaluating the Report, unless there may be a conflict of interest<sup>1</sup> or a situation that may affect their impartiality.

By exception, when the Report is received by the Human Resources and relates to a human resources topic<sup>2</sup>, a member of the Human Resources will be designated as **Coordinator** responsible for evaluating the Report. This person should have no conflict of interest and no situation should affect their impartiality.

When the **LVMH Alert Line** is used, the Report is initially received by the Group’s Ethics & Compliance Department. The Report is then addressed to the **Ethics & Compliance Correspondent of the Maison** concerned by the reported facts. In such case, the **Ethics & Compliance Correspondent** is the **Coordinator** responsible for evaluating the Report.

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<sup>1</sup> A conflict of interest may occur when personal interests impair or appear to impair the ability of an employee to perform his or her responsibilities in the best interests of the Group. The personal interests of employees include any direct or indirect, financial or non-financial benefit for the employees themselves or for members of their family, for their friends or personal relations, or for organizations with which they or their family, friends or personal relations have or have had a business relationship.

<sup>2</sup> Including the following: discrimination, harassment, infringements of occupational health and safety regulations, violations of social standards and employment law, unlawful employment.

### **3.3.2. Cases where the Report may be handled by the Group**

In principle, the Report is **processed by the Coordinator of the relevant Maison or Entity**, as described above (section 3.3.1.).

By exception and unless expressly objected by the author of the Report, the Report should be **processed by the Group** in the following cases:

- when the allegations involve the Ethics & Compliance Correspondent of the Maison or Entity or if there may be a conflict of interest or a situation that may affect their impartiality;
- when the persons targeted by the Report include a member of the Group’s Executive Committee, or a member of the Maison or Entity’s Top Management including the Chairman, the Chief Executive Officer, a General Manager, or a member of the CODIR/COMEX;
- when the Report contains allegations of a potential act of Retaliation (as defined in section 6. below) further to a Report that was handled by the Maison or the Entity.

In such cases, the **Group Privacy Ethics & Compliance Director** would become the **Coordinator** as soon as he receives the Report and the **LVMH Investigation Committee** (committee set up at Group level and made up of the Group General Counsel, Group Talent Management Director and Group Privacy Ethics & Compliance Director) would handle the Report.

In the event where the allegations would have been made against one of the members of the LVMH Investigation Committee or if there may be a conflict of interest or a situation that may affect their impartiality, the Report should be handled by the remaining two members.

In addition, the **Group should be involved in the processing of the Report, in coordination with the Maison or Entity**, in the following cases:

- when it is clear that the allegations contained in the Report could cause major damage to the reputation of the LVMH Group as a whole (most sensitive cases);
- or whenever the Maison wishes to involve the LVMH Group, notably because the Report involves a certain level of complexity.

### 3.4. Assessment of the admissibility of the Report by the Coordinator

After the acknowledgement of receipt is sent and before any further steps are taken, the Coordinator (as identified above, section 3.3.) assesses the admissibility of the Report to determine whether it qualifies as an “E&C Alert” covered by this Alert Policy.

#### 3.4.1. Criteria of admissibility and qualification as an “E&C Alert”

In order for a Report to qualify as an E&C Alert, the following criteria must be met:

- (i) the reported facts must have occurred or be very likely to occur **within the LVMH Group or in relation to its activities**;
- (ii) the Report shall contain allegations of existing or reasonably suspected misconducts related to:
  - a crime or offence, a violation or an attempt to conceal a violation of all applicable laws or regulations, or a threat or harm to the public interest;
  - a violation of the LVMH Code of Conduct, internal guidelines, principles and policies of the Group and of the Maison and the LVMH Supplier Code of Conduct;

and

- (iii) the author of the Report is:
  - an **employee** of the LVMH Group whether working full-time or part-time, for an indefinite-term or fixed-term, a former employee, a temporary staff, an intern<sup>3</sup>, a prospective employee<sup>4</sup>, or a **board member** or **shareholder**,
  - **any external stakeholder** of the LVMH Group that has become aware of the reported facts in the context of his/her professional activities, including suppliers, service providers, their subcontractors, and their staff or directors, or
  - any customer who witnessed an ethical breach (excluding customer service requests).

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<sup>3</sup> For all these categories of persons: when the information was obtained in the context of the employment relationship.

<sup>4</sup> When the candidate applied for a position and the information was obtained in the context of this application.

The author of the Report may be asked to provide further information so the admissibility of the Report can be assessed.

The Report shall be made in **good faith**<sup>5</sup>. Any Report made in bad faith will not be handled pursuant to the provisions of the Alert Policy.

Any false Report or containing false statements made knowingly and deliberately, any disclosure of misleading information, or any bad faith act, could lead to **disciplinary or legal action** in accordance with applicable laws.

#### ***3.4.2. Information of the author of the Report***

The author of the Report is informed of whether the Report qualifies as an E&C Alert under the present Alert Policy or not. In the latter case, the author of the Report is informed of the reasons why the Report was deemed inadmissible and, where possible, is advised on possible alternate avenues for their concern to be addressed.

### **3.5. Investigation process**

Once the Report has qualified as an E&C Alert, it gives rise to an adequate and fair investigation which will be carried out within a reasonable timeframe.

The purpose of the investigation is:

- to establish whether the allegations set out in the E&C Alert are accurate and substantiated;
- to collect potential evidence;
- to ultimately determine what actions should be taken to remedy the reported facts, when necessary.

At any stage of the investigation process, the author of the Report may be asked to provide further information necessary to establish whether the allegations are accurate and substantiated.

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<sup>5</sup> Good faith: acting in good faith means having, in light of the circumstances and information available at the time of the Report, reasonable grounds for believing that the facts reported were accurate and that the information fell within the scope of an E&C Alert, and refraining from deliberately making false, malicious or misleading accusations.



### ***3.5.1. Setting up of an Investigation Team***

The Coordinator sets up an Investigation Team to carry out the investigation.

Members of the Investigation Team are selected from the relevant departments (Human Resources, Finance, Internal Control, IT...), for their **impartiality**<sup>6</sup> and their **ability to handle the E&C Alert**, taking into account the nature and the severity of the allegations.

The Investigation Team is composed of a **Human Resources representative** when the matter relates to **any human resources topic**, including the following: discrimination, harassment, infringements of occupational health and safety regulations, violations of social standards and employment law, unlawful employment.

Measures are taken to ensure that each member of the Investigation Team respect the confidentiality of E&C Alerts (see below, section 5.).

In some cases, the Investigation Team (or the LVMH Investigation Committee) may be assisted by a **third party** in the conduct of the investigation. Such third party shall be provided only with the information strictly necessary in the context of its mission and shall be subject to a confidentiality obligation.

### ***3.5.2. Principles applicable to the investigations***

The key principles to be observed in the conduct of investigations related to an E&C Alert are as follows:

- **Compliance** with applicable laws and regulations;
- **Neutrality and impartiality:**
  - Any investigation is proportional to the nature and the severity of the allegations and the related risks for the relevant Maison/Entity and the LVMH Group.
  - The person(s) against whom the allegations have been raised have the opportunity to give their version of the facts.
- **Confidentiality** as per section 5. below.
- **Track-recording of the steps taken** to investigate. Only strictly necessary and relevant information regarding the handling of the E&C Alert should be collected, in compliance with the applicable data protection laws.

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<sup>6</sup> Members of the Investigation Team who may have a potential conflict of interest will inform the Coordinator as soon as possible.

Means that may be put in place for the purpose of investigating the reported allegations may include analysing emails and video cameras, conducting interviews, requesting the assistance of outside counsels or experts.

### **3.6. Closing of the E&C Alert – Investigation report and follow-up actions**

After enough information have been gathered for the investigation purposes, the E&C Alert can be closed.

#### ***3.6.1. Investigation report***

An investigation report is drawn up, containing the reasoned, factual conclusions reached by the Investigation Team regarding the reported allegations.

If it is considered that the allegations are inaccurate or not sufficiently substantiated, the E&C Alert is closed without any follow-up actions to be taken.

If it is found that the allegations are substantiated, follow-up actions may be taken.

#### ***3.6.2. Potential follow-up actions***

Where applicable, any follow-up actions must be implemented within a reasonable period of time after the issuance of the investigation report, in coordination with the relevant departments (Human Resources Department, Legal Department, Internal Audit Department, etc.).

Follow-up actions include any adequate **corrective measures** taken at Maison/Entity or Group level to properly address the consequences of the E&C Alert, including:

- disciplinary measures;
- initiation of legal actions or report to an authority;
- termination of a third party business relationship;
- dedicated training;
- awareness-raising campaigns;
- revision of internal rules or processes.

#### ***3.6.3. Reporting***

The Group Privacy Ethics & Compliance Director inform the Group's top management of the most sensitive cases.

Maisons report annually all E&C Alerts that they have processed to the Group Privacy Ethics & Compliance Director who communicates statistics to the Group's top management and to the Ethics and Sustainable Development Committee of the LVMH Board of Directors.

## *4. Information delivered to the persons involved in the E&C Alert*

### **4.1. Information delivered to the author of the Report**

If means of contact have been provided, the author of the Report will:

- be provided with regular feedback on the progress of the processing of the Report, to the extent possible;
- be provided in writing, within a reasonable timeframe not exceeding **three (3) months from the acknowledgement of receipt**, with information regarding the measures that were taken or that are contemplated in order to evaluate the accuracy of the allegations or, if applicable, regarding the measures taken to remedy the reported facts (and the reasons for these measures); and
- be informed of the outcome of the evaluation of the E&C Alert once the investigation is concluded, and of the closure of the E&C Alert.

### **4.2. Information delivered to the persons whose Personal Data is processed in connection with an E&C Alert**

For Reports processed by entities located in the European Union, if providing the following information would not prejudice the conduct of the investigation (for instance, regarding the preserving of evidence), any person whose Personal Data<sup>7</sup> is processed in connection with an E&C Alert (including the person(s) mentioned or targeted by the E&C Alert) should be informed of that fact no more than one (1) month after the beginning of the processing of their Personal Data as part of the E&C Alert process. This information contains all the information required by the General Data Protection Regulation 2016/679 of 27 April 2016, art. 14.

If providing the information would prejudice the conduct of the investigation, it may be provided at a later stage (i.e. at the latest when the investigation is terminated and the E&C Alert is closed).

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<sup>7</sup> The term “**Personal Data**” shall have the meaning assigned in the GDPR.

## 5. Confidentiality

The LVMH Group is committed to taking all adequate measures to ensure the integrity and confidentiality of E&C Alerts, at all stages of the evaluation process, with respect to:

- the identity of the author of the Report,
- the identity of the person(s) targeted by the E&C Alert,
- the identity of the person(s) mentioned in the E&C Alert, and
- the facts that were reported and the information that was gathered during the evaluation process.

Any person having access to such information is bound by an obligation of confidentiality. Any breach of this confidentiality obligation may lead to **disciplinary or legal sanctions** in accordance with applicable laws.

As an exception, in the event of a request from a competent judiciary or administrative authority, or where required by applicable laws, such confidential information may be disclosed.

## 6. Protection of the author of the Report and guarantee of the absence of Retaliation

The LVMH Group is committed to taking all adequate measures to protect the author of the Report, as well as any person who assisted the author of the Report.

- Under no circumstances may the author of the Report's identity be disclosed to anyone unless with the author of the Report's express agreement (excluding the cases mentioned in section 5. above).
- Any obstacle to the exercise of the right to Report may lead to **disciplinary or legal action** in accordance with applicable laws.
- The LVMH Group ensures that **no disciplinary action or Retaliation is taken against the author of the Report or any person who assisted the author of the Report for a Report made in good faith**, even if the reported facts subsequently prove to be inaccurate or unfounded or do not give rise to any proceedings or penalties.

**Retaliation** means any direct or indirect negative action taken as a result of an E&C Alert. Such actions include: threats, coercion, intimidation, exclusion, harassment, discrimination, reputational damage (including through social networks), negative performance feedback unrelated to actual performance deficiencies, demotion or withholding of promotion, reassignment, transfer of duties, change in working conditions or hours, disciplinary measures, suspension, dismissal.

With respect to external stakeholders, such actions include negative changes to their relationship with the LVMH Group including termination of a contract.

If anyone believes that they may be subject to Retaliation, they must immediately inform the Ethics & Compliance Correspondent or the Group Privacy Ethics and Compliance Director, and those engaging in such act will be appropriately disciplined.

For each E&C Alert that required the implementation of follow-up actions, a Human Resources member of the Maison/Entity of which the Reporter is an employee will be responsible to check, within a reasonable period not exceeding 12 months from the closure of the E&C Alert, that no Retaliation took place against the Reporter.

## ***7. Contact***

Any questions or request for information about this Alert Policy must be addressed to the Group Privacy Ethics and Compliance Director via the following email address: [ethics@lvmh.com](mailto:ethics@lvmh.com).

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