

Charter for Corporate Social Responsibility (CSR)

-2023-

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Preamble

The purpose of this Charter is to present all the actions implemented at Regimbeau to develop and improve the CSR policy (Corporate Social Responsibility). It states our values, our convictions and our commitments.

The search for innovative and pragmatic solutions as well as the creation of value for our clients, in the context of the management, optimization or defense of their IP rights, are at the heart of our advisory mission. Our ambition is to build solutions and relationships of quality and trust both within our company with the women and men who make up our firm, and with our clients and partners, as well as within the economic sectors in which we operate. In order to respond to the environmental, societal and ethical issues that have become major in our society, Regimbeau is committed to a Corporate Social Responsibility approach.

The publication of this Charter allows Regimbeau to exchange and share good CSR practices with its partners and more generally with all stakeholders and to create, through this document, a reference to which each of them shall refer.

This Charter defines the principles that Regimbeau expects in terms of ethics, the fight against corruption, the respect for human rights and labor standards, the fight against discrimination, the protection of human health and safety and the protection of the environment, which are intended to ensure ethical and sustainable business relationships with its partners, in compliance with applicable national laws and regulations, the United Nations Global Compact, the Fundamental Conventions of the International Labor Organization (ILO) and any other convention or declaration applicable in this area. This approach is perfectly in line with Regimbeau's strategy and values which are:

Creativity

Creativity is at the heart of the solutions we provide to our clients.

We foster the expression of this creativity by encouraging the individual and collective initiatives of our teams.

Expertise

It is based on the high level of training and skills of our team and on our organisational capital.

We put the expertise and recognised experience of our teams at the service of our clients by drawing on the full range of Intellectual Property tools for tailor-made support.

Trust

The relationship of trust with our clients and our teams is paramount.

We foster long-term relationships with our clients to build genuine proximity.

We invest in the development of our staff by cultivating a management style based on training, trust and delegation.

Collaboration

We work to develop collective intelligence and creativity, both among our staff and with our clients.

We mobilise the various skills and professions according to the project, while valuing the contribution and role of each individual.

This Charter sets out the commitments that Regimbeau expects from each partner so that it conducts its activities in compliance with Regimbeau's CSR policy as well as all laws and regulations in force and applicable to their business.

Each partner is asked to read this Charter as well as the "Responsible Purchasing Charter" and to comply with them by applying the same values and principles within its company and with each of their stakeholders.

This Charter will evolve as part of our continuous improvement quality policy.

Management

Creativity

Expertise

ollaboration

Trust

I. Firm presentation & general information

1.1 Logos & baseline

1.2 Identification

- Name: REGIMBEAU
- Share Capital: 30.000€
- Trade and Companies Register: Paris B 784661357
- Head office: 20 rue de Chazelles 75017 PARIS
- Sites:
 - Rennes : Parc d'affaires Cap Nord A, 2 allée Marie Berhaut, CS 71104, 35011 RENNES
 - Lyon: 87 Rue de Sèze, 69006 LYON
 - Grenoble: 10 rue d'Arménie 38000 GRENOBLE
 - Montpellier: 494, rue Léon Blum 34000 MONTPELLIER
- Site in the EU territory:
 - Munich: Landwehrstraße 61 80336 MUNICH, GERMANY

1.3 Management and stakeholders

- President of the management board: Frédérique FAIVRE PETIT
- Excecutive Commettee members:
 - Jean-Robert CALLON DE LAMARCK: General Manager,
 - Emmanuelle LEVY: Chief Operating Officer
 - Martine BLOCH-WEILL: Chief Operating Officer
- Secretary General : Anne VILA
- Quality and CSR Manager: Ludivine WATAT
- GDPR Manager & DPO: Franck DELAMER

1.4 Applicable collective bargaining agreement

Regimbeau is not subject to any collective bargaining agreement.

1.5 Certification, distinction, prizes, labels, trophies obtained

- ISO 9001: 2015 for Intellectual Property advisory activities for the Paris, Lyon, Rennes, Montpellier and Grenoble offices.
- Qualiopi for training actions.





II. Responsible Purchasing

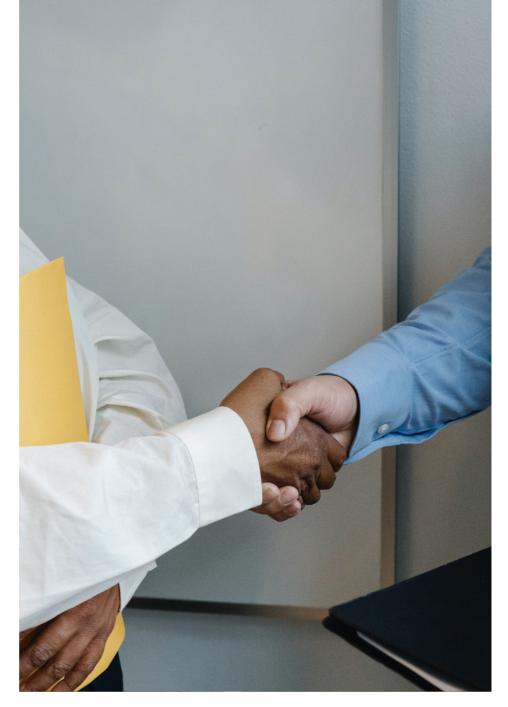
2.1 Responsible purchasing policy

Regimbeau is one of the leaders in its field and implements a purchasing policy with a willingness to build a sustainable relationship with its partners and suppliers in France and throughout the world.

Within the framework of its activities, the firm, its suppliers and partners undertake to make their best effort to respect, implement and ensure respect for Regimbeau's values as presented in its responsible purchasing charter with regard to human rights, labour standards, the environment, the fight against corruption, forced labour, child labour, harassment, remuneration, working hours, non-discrimination, health and safety, freedom of association and collective bargaining, in compliance with their contractual commitments and the national legislation in force.

Regimbeau selects and evaluates its suppliers on their compliance with commitments, price, quality, performance and delivery times criteria as well as the suitability of the services offered to the firm's needs. Compliance with these values and criteria forms the basis of all its purchasing decisions.

In addition, Regimbeau is a member of the Sedex network, which aims to bring companies and their international suppliers closer to share data for improved performance.



2.2 Circular economy and geographical location

Regimbeau's activities are part of the local economy, whether it is Parisian or provincial, depending on the location of its offices.

This diverse geographical location allows Regimbeau to establish partnerships with local regional institutions, universities and professional associations, as well as to participate in local symposiums and forums for full involvement at local level. Furthermore, recruitment is targeted according to Regimbeau's global needs. The regional offices allow us to broaden the scope of recruitment by benefiting from local candidates.



III. Business ethics

As employees of an advisory firm, Regimbeau's employees, and more specifically the Industrial Property Attorneys (IPAs), are subject to strict rules of ethics and confidentiality, in accordance with Article L.422-11 of the Intellectual Property Code, which imposes absolute professional secrecy on IPAs.

3.1 Compliance with competition rules

Regimbeau is committed to complying with competition rules and has the same requirements towards its suppliers.

In particular, Regimbeau shall establish procedures to ensure that equal treatment is given to Suppliers and that purchasing decisions are based on an objective and comparative assessment of the integrity and reliability of suppliers. The supplier selection criteria set out in 3.1 are also an integral part of Regimbeau's ethical principles.

In addition, Regimbeau strictly complies with the regulations prohibiting any agreement, concerted practice or abuse of a dominant position in the relevant market vis-à-vis its Suppliers.

3.2 Respect for confidentiality

Within the framework of its activities and in accordance with the GDPR, Regimbeau guarantees the confidentiality of the data of its employees, clients and stakeholders by means of a secure IT system and appropriate processes.

Regimbeau's servers are located on different secure sites in France.

In order to guarantee the confidentiality, Regimbeau has set up an IT charter and a telework charter which are given to all employees who accept them. For new employees, training to raise awareness of data security processes is provided during their induction day. In addition, Regimbeau has chosen to equip all its employees with professional laptops with secure access (VPN connections, antivirus and firewall).

3.3 Corruption and conflict of interest

Regimbeau condemns all forms of corruption and prohibits situations of conflict of interest involving the various stakeholders. To this end, an operating procedure describing the checks and processes to be followed in the event of a potential conflict of interest has been implemented and communicated to employees.

Regimbeau's continued relationship with its suppliers shall be conditional upon their refusal to engage in any act of bribery or money laundering, any conflict of interest situation or any other violation of the legal provisions applicable in the countries in which they operate.

With regard to gifts and invitations, the rule of transparency applies in all circumstances: gifts received or offered in the context of business relationships are reported to the hierarchy and are subject to authorisation by the Management.

Regimbeau undertakes to:

- Have a transparent pricing policy;
- Comply with business law and fight against any abusive practice;
- Respect transparency and conservation of financial and non-financial information according to the IT security standards in force and in compliance with the GDPR;
- Prevent insider trading and bribery, and fight against money laundering;
- Respect good governance rules, and in particular:
 - Organising CoGer and ComEx regularly with agendas and CRs;
 - Provide the Management Committee and its specific committees as well as the independent auditors with all necessary information;
 - Inform internal and external stakeholders promptly of the decisions taken by the ComEx;
 - Ensure clarity of strategic objectives and proper functioning of the management bodies.

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IV. Human rights and labour law

Regimbeau shares its values of creativity, expertise, collaboration and trust with its employees. Through these values, Regimbeau aims to:

4.1 Preserve employment

The average number of Regimbeau's workforce is 192 across all offices and subsidiaries (Paris, Lyon, Grenoble, Montpellier, Rennes and Munich).

The average length of service of employees is 9.24 years.

Hiring is mainly aimed at supporting the growth of the firm, and concerns both engineers and legal counsels as well as the recruitment of administrative and support staff. For some positions, Regimbeau has set up a recruitment process consisting of several interviews with the manager, the secretary general, the partners and the head of the Human Resources Department.

In terms of remuneration, Regimbeau endeavours to offer salary levels in line with the high level of qualification required by its activity and the market conditions. Salary increases are individual, based on merit, according to objective assessment elements, including individual objectives set in the annual interviews, participation in cross-functional missions, the company's financial indicators, etc.

In addition to the statutory profit-sharing, Regimbeau has signed a profit-sharing agreement to involve its employees more closely in the company's results.

Furthermore, in the context of the mutual insurance and provident cover from which employees benefit, the coverage level provided by the employer is identical for all employees of all categories, whether they belong to the executive or the employee category, in order to respect equity between employees.

4.2 Promote well-being at work

Regimbeau provides employees with:

- A flexible work organisation and offices with the possibility of teleworking up to three days a week from two predeclared locations;
- Break rooms, cafeteria (Paris, Lyon, Rennes, Grenoble);
- Air-conditioned offices;
- Coffee machines and water fountains allowing employees to access potable cold and hot water throughout the working day.

Employees can also benefit from:

- A conviviality committee (composed of employees and partners) organises board games and outdoor games tournaments, participation in races or sports tournaments or even competitions to discover the passions of employees;
- The organisation of a half-day team building is offered by the management to employees once a year.



4.3 Value and develop the know-how of our employees

Regimbeau is concerned about the professional training of its teams and their high level of qualification, for which it devotes a budget each year that exceeds the legal obligation for training. It also organises annual in-house training courses to ensure that employees' knowledge is maintained and regularly updated.

Regimbeau also promotes apprenticeships and work-study programmes and has several trainees each year, some of whom are now working as patent /trademark attorneys at Regimbeau.

Various integration day sessions are organised during the year to welcome new employees and to pass on the values and information about the firm, in particular by presenting the organisation, the activities of the various departments and the internal rules in force.

Training in professional software is also mandatory for new employees.

In addition to a strong commitment to training all its employees, Regimbeau pays particular attention to the professional training of its patent attorneys (CPI qualification issued by the INPI and qualification as European representative by the EPO) and its trademark attorneys (CPI qualification issued by the INPI which also qualifies them as representatives before the EUIPO). The CPI examination requires intensive preparation over several years. Regimbeau takes charge of all the costs related to these examinations.

Moreover, Regimbeau is a certified training organisation and can, as such, provide training to its clients.

Regimbeau also has an internal promotion policy aimed at valuing the know-how and commitment of its employees in order to retain talent and develop their skills.

4.4 Develop good management practices

Regimbeau has trained all its managers in management techniques to enable them to develop:

- Their organisational skills to be able to mobilise the resources available to achieve the objectives set, while ensuring that team members correctly carry out the tasks assigned to them and measure performance;
- Leadership and communication skills to be able to motivate their team and manage conflicts between or with employees, suppliers, clients or other service providers.

Regimbeau's organisation chart ensures that all employees are clearly organised and know exactly where they are in the organisation, at what level in the hierarchy they are and to which manager they report.

The definition of functions also involves the existence of job descriptions which provide employees with a precise description of their position, formalising its various missions and tasks as well as its interactions within the firm.

Regimbeau is committed to respecting and promoting daily compliance with the legal rules and provisions relating to rest periods and maximum authorised working hours. In this context, the firm has set up a charter on the right to disconnect. In addition, as part of its human resources policy, Regimbeau's managerial and non-managerial staff have flexible working hours in the morning, at lunchtime and in the evening.

With regard to the above-mentioned telework, employees, subject to compliance with the conditions defined in the Telework Charter, may benefit from occasional, regular or exceptional telework.



4.5 Fight against discrimination

Regimbeau ensures that recruitment, promotion and access to professional training are carried out without discrimination of any kind.

In this respect, Regimbeau undertakes not to apply, in its choices or decisions, any of the 19 criteria for discrimination prohibited by law n°2001-1066 of 16 November 2001 relating to the fight against discrimination, namely age, political opinions, sex, morals, health conditions, race, trade union activities, surname, sexual orientation, sexual identity, real or supposed origin, physical appearance, ethnic group, religious beliefs, family situation, disability, genetic characteristics, state of pregnancy, citizenship.

4.6 Promote social dialogue

Regimbeau's management has always favoured social dialogue and exchanges and discussions at grassroots level with employees and employee representative bodies.

Regimbeau is committed to respecting the prerogatives of the Employee Representatives gathered within the Social and Economic Committee (CSE) which is elected by a secure voting system via the Alphavote solution implemented in 2019.

4.7 Commit to civic actions

For many years, Regimbeau has been working with suppliers who are members of associations involved in the integration of persons with disabilities (in particular a centre for professional reintegration for many printing jobs).

Regimbeau has also been participating for nearly 3 years in the DuoDay event (organised by the Ministry of Solidarity, Autonomy and the Disabled), which allows a person with disabilities to spend a day in a professional context in order to observe the work of an employee and to participate in his or her daily tasks.

More than a dozen disabled persons have already been welcomed to Regimbeau in order to help them discover its professions.

Other occasional social actions are also regularly organised, such as:

- The "DONS DU SANG" (blood donation) mornings, where the collection is organised during employees' working hours,
- The donation of furniture to an association in favour of intergenerational housing,
- The creation of a participatory library for employees, whose books are regularly donated to associations (e.g.: Le Bouquin Volant),
- Occasional collections of donations for various associations (collection of glasses, collection of "boîtes de noël solidaires"),
- Donations to the "Bleu, Blanc Coeur" association (an association supporting farmers),
- The participation of Regimbeau employees in solidarity sports events (ODYSSEA race, the funds of which are donated to associations in the fight against breast cancer)



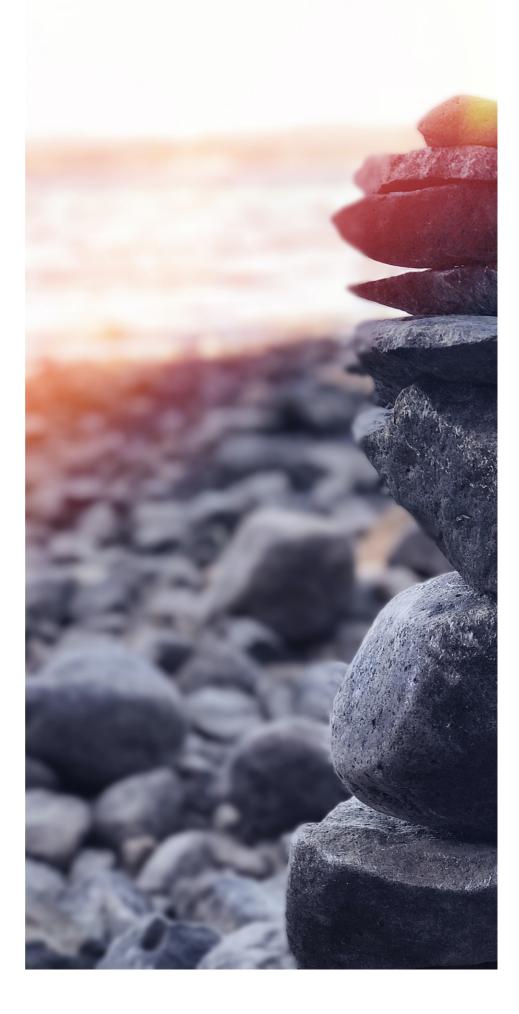
V. Health and Safety

Regimbeau is particularly sensible of the risks to employees and ensures that everyone has a healthy and peaceful workplace. The firm's activity does not in itself present any physical risks for employees.

Regimbeau ensures that the various premises (head office and branches) comply with the legal standards and provisions in terms of health and safety and regularly assesses the health and safety risks to which employees may be exposed, which are listed in the Single Occupational Risk Assessment Document (DUERP in French "Document Unique d'Evaluation des Risques Professionnels").

Regimbeau has the necessary fire safety equipment and information sheets. First aid training is regularly offered and all employees are trained in fire safety.

Our company has been able to adapt throughout the pandemic by providing appropriate equipment (gel, masks, etc.), by adapting the frequency and methods of cleaning the premises and by encouraging teleworking.

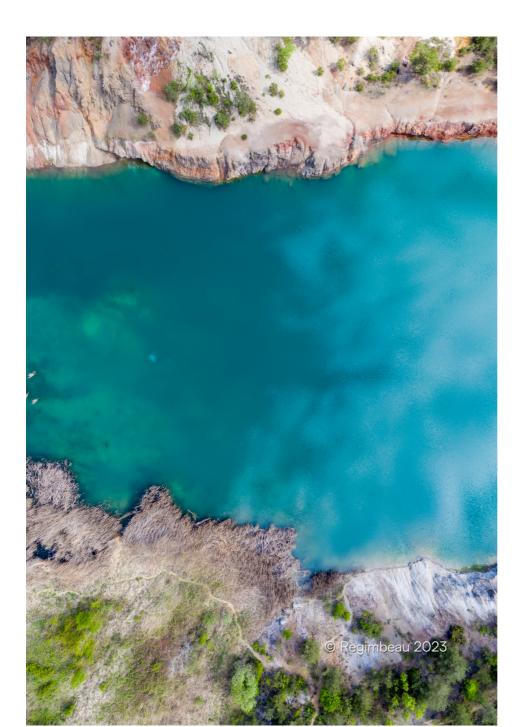




VI. Environment

6.1 Resource management and waste recycling

- Limiting paper printouts (dematerialisation of files);
- Setting up a recycling circuit for paper and ink cartridges;
- Provision of containers to collect batteries, light bulbs and coffee capsules for recycling;
- Replacement of conventional batteries with rechargeable batteries;
- Use of bean-to-cup coffee machines to replace aluminium capsule machines;
- Replacement of individual plastic water bottles with carafes and installation of water fountains connected to the network on each floor of the Paris site and in each branch;
- Elimination of all plastic cups, plates and cutlery in favour of reusable or recyclable materials;
- Use of ecological cleaning products (washing-up liquid, toiletries, etc.) and obligation imposed on cleaning companies to use cleaning products from an organic range.



6.2 Energy savings

Following the Energy Sobriety Plan presented by the government on 6 October 2022, the following actions have been put in place:

- Replacement of all lighting with LED systems;
- Installation of motion detectors in some common areas, toilets and washbasins to limit energy consumption;
- Switching off office lights when employees leave the company;
- Recommendations to employees to turn off screens and put computers on standby during breaks or when leaving the premises;
- Recommendations on the use of electric convector heaters and ventilation of offices;
- Programming a day/night system with the installation of a day/night programmer and turning off the boiler at weekends;
- Programming of a standby system for electrical appliances (printers, etc.).

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DOC 542

Quality and Organisation Department

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About Regimbeau

Regimbeau, a European IP law firm, has been assisting companies and private and public project developers to protect, enhance and defend their innovations (patents, trademarks, designs) for 90 years. Sixteen partners head a team of more than 200 people whose skills are put into practice in every strategic aspect of Intellectual Property - business intelligence and information search, license agreements, IP portfolio audits, partnership negotiations, acquisition of industrial property rights, litigation. Thanks to its wide-ranging expertise, Regimbeau (present in Paris, Munich, Lyon, Rennes, Grenoble, Montpellier and Toulouse) can meet its clients' needs for international strategic consulting while preserving personalized relations of the highest quality.

