

GROUPE GM ECO-GREEN POLICY

Operating through an international network of exclusive agents and manufacturers, Groupe GM has been providing guest amenities to hotels around the world for more than 30 years.

Our mission is to create unique guest amenity lines adapted to our customers' needs and reflecting their corporate identity.

Since its creation Groupe GM has always promoted an eco-green development policy: our social and environmental responsibility is part of our long-term strategy and belongs to our company's project. We encourage our employees, business partners and customers to share our values and to take part in our sustainable development project.

Creating products of superior quality is deeply rooted in our business philosophy and at every stage of our activity we strive to protect the environment and to maintain a high standard of business ethics.

All our products are manufactured with respect for the environment and we promote ecological packaging and formulation solutions.

Summary

1- Adherence to cosmetic regulations to safeguard the safety of users

2- Supply chain management

3- Control where possible of the environmental impact of our factories

3-1 We save energy where possible

3-2 We monitor our water consumption

3-3 We minimise our consumption of raw materials

3-4 We use recyclable plastics

3-5 We minimise our outer packaging and cardboard consumption

3-6 We conduct a waste recycling policy

3-7 We minimise transportation costs to reduce fuel consumption

4- Eco-design policy

4-1 We continue to introduce products that conform to European and International environmental requirements

- Ecolabel
- Ecocert
- Cosmebio

4-2 We continue to develop ecological packaging

- Dispensers
- Airless dispensers
- Biodegradable bottles
- Biodegradable products
- Recyclable packaging

4-3 We offer ecological formulations:

- Natural formulations
- Organic formulations
- Ecolabel formulation

5. Distribution Network - worldwide

1- Adherence to cosmetic regulations to safeguard the safety of users

The safety and well-being of users of our products are fundamentally important to Groupe GM's environmental policy. The company conforms to European safety regulations of all cosmetics manufactured and distributed.

Cosmetic hotel amenities must conform to the same regulations as any other cosmetic product. We incorporate all worldwide directives and we ensure that all cosmetic products placed on the market by Groupe GM meet the required quality standards.

Groupe GM maintains contact with COLIPA the European Cosmetic Perfumery and Toiletry Association in Brussels, which enables us to keep up-to-date with any new cosmetic information.

Our products conform to the following specifications:
SASO agreement (Saudi Arabian Standard Organisation)
The Swan label (Nordic Ecolabel)
REACH
ECOLABEL
ECOCERT
The Kosher certification

Groupe GM is legally responsible for all cosmetics sold and manufactured within its agency/distribution network. To ensure that products conform to cosmetic regulations, a professional and technical process must be followed and for each cosmetic line a **technical and legal cosmetic file is created**.

Groupe GM complies with the European Directive 93/35 EEC issued to amend and update cosmetic law 76/768 EEC, our cosmetics are also adapted to worldwide requirements and follow best manufacturing practices such as indicating the quality and traceability of ingredients, expiry date, the production date and directions for use on individual products. Each product manufactured by Groupe GM bears its **identity card** on the packaging with the following information:

- product name
- name of the company responsible for placing the product on the market
- origin
- expiry date
- PAO (Period After Opening)
- weight or volume
- batch number (ensuring full traceability)
- the symbol certifying the weight control
- the recyclable symbol (mobius loop)
- the list of ingredients

The technical and legal cosmetic file also includes information about cosmetic tests and results with information about companies involved in the manufacturing of the cosmetic products we distribute.

These companies are officially declared with AFSSAPS (Agence Française de Sécurité Sanitaire des Produits de Santé) as Groupe GM's manufacturers many of which are ISO 9002 certified and are always available for inspection.

By providing their guests with cosmetic products that comply with cosmetic law, hotel managers are not responsible in the case of a dispute or investigation to the contrary.

2- Supply chain management

Groupe GM depends on its suppliers and recognises that a sustainable and sound business can only be developed if the whole supply chain works effectively, communicates and shares common values. It is therefore important that Groupe GM's suppliers comply with this code of conduct.

Groupe GM is committed to maintaining a high standard of business ethics. A key objective is to strive to purchase or manufacture products from suppliers who can demonstrate environmental and social responsibility and such products will have a reduced environmental impact during their life cycle. In order to achieve this objective suppliers are required to confirm compliance with the criteria listed below and, in turn, should ensure that their own suppliers do the same.

Suppliers must comply with all laws and regulations of the countries in which they operate. This includes, but is not restricted to, health and safety regulations, human rights guidelines (International Labour Organisation), environmental protection and product safety laws.

Suppliers, and their sub-contractors or suppliers, shall not use in their facilities any form of child labour or forced labour (as defined by the UN Convention on Human Rights and Child Labour).

Suppliers must comply with local laws and industry standards regarding payment, working hours (including overtime), rest days and public holidays. All employees must receive at least the national minimum wage.

Suppliers are required not to discriminate on the basis of race, colour, religious belief, sex, sexual orientation, disability or pregnancy.

Suppliers are required to comply with legal requirements regarding fair competition and must always act confidentially, lawfully and with utmost integrity.

Suppliers are required to have a programme to continuously and progressively reduce negative environmental impacts (identifying main impacts and employing procedures to reduce them). They are expected to be environmentally pro-active and to meet or exceed environmental requirements and regulations.

Suppliers must not use any banned substances and should strive to use only substances with low toxicity and high biodegradability.

Suppliers should not use materials from endangered varieties of wood and should be able to provide documentary evidence of usage of wood from sustainable managed forests.

3- We control the environmental impact of our factories

3-1 We save energy:

Our filling factory has thermal insulation complying with the Kyoto Protocol; it uses a layer of fibreglass, which is 12 cm thick, i.e. twice as thick as that generally used for building insulation. All windows have double-glazing making it possible to reduce the air conditioning and heating requirements and therefore energy consumption.

Our filling factory has domed roofing, which generates top lighting of 17%, making it possible to work in natural light for two thirds of the year and to save electricity.

We use gas arotherm heating which is known for its controllability and its non-polluting nature together with an adiabatic cooling system, which does not emit any greenhouse gas.

Hot air released by the compressors is recovered for heating the storage units.

We favour cold manufacturing processes (with reduced electricity energy consumption) for our bulk foam products.

We are also studying cold manufacturing processes for other bulk products such as body lotions and conditioners.

Finally Groupe GM has chosen to use pollution free energy through a special EDF balance contract providing electricity produced from renewable energy sources.

3-2 We monitor our water consumption:

- Production is categorised in such a way as to avoid as far as possible cleaning cycles, which are only needed because of changes of colour or product and not for reasons of hygiene and safety.
- A collection tank of 120 m³ enables the collection of rainwater and in addition it is equipped with a hydro-carbon separator in order to avoid any pollution risk.

3-3 We minimise our consumption of raw materials:

- In the manufacturing cycles of soaps, the raw materials ejected during shaping are in a closed circuit and are therefore put back into production, which means that waste from raw materials is minimised.
- Most of our bulk liquid production is carried out using quantitative formulae and any introduction of raw materials has to be weighed and measured, which makes it possible to optimise their use and to avoid wastage.
- All our perfumes are contained in various types of packaging, to comply with the quantitative needs of each factory and to reduce any wastage.

3-4 We use recyclable plastics:

- Our plastic packaging can be recycled.
- Groupe GM made the decision to stop using PVC bottles and to replace them with plastic materials that are more readily recycled, such as PET, PETG, PEHD and PP.

3-5 We minimise our outer packaging and cardboard consumption:

- We use recycled cardboard
- We minimise unnecessary outer packaging: it does not exceed 20% of our finished products in order to

minimise the quantities of wasted materials

- 60% of empty component boxes (stoppers and bottles) are returned to the original manufacturer to be used in subsequent deliveries.
 - The packaging of finished products is kept to a minimum (for a delivery in an individual box in normal product conservation conditions), without outer packaging.
 - The reference number for each box is also systematically optimised to reduce the amount of packaging.
- The maximum weight which the final consumer is able to handle restricts us in our attempts at optimisation.

3-6 We conduct a waste recycling policy:

- We have reprocessing contracts for the liquid and solid waste (bottles, boxes, stoppers).
- The liquid waste is not put back into the classic drainage circuit, but treated by companies who specialise in recycled solid waste.

3-7 We minimise transportation costs and reduce fuel consumption:

- Delivery onto platforms like Synergie enables us to reduce fuel consumption in individual journeys to hotels.
- We optimise transport, where possible we use sea shipment rather than air shipment.

4- We apply an Eco-design policy

The aim of eco-design is to reduce the environmental impact of each product/line during its lifecycle from creation to disposal.

At Groupe GM we take into account the environmental consequences of product manufacturing from design to production, including distribution, use and disposal, in order to be able to offer the most ecological lines as possible to our customers, especially in terms of packaging and formulation.

4-1 We offer labellised products

4-1-1 ECOLABEL

Groupe GM's filling factory received the **EU Eco-label** for several lines of products.

The EU Eco-label: Recognised in the 25 member states of the EU, the EU Eco-label "Flower" is a unique certification scheme aimed to help European consumers distinguish greener, more environmentally friendly products. All products bearing the "Flower" have been checked by independent bodies to ensure compliance with strict ecological and performance criteria:

Minimise harmful impact to aquatic ecosystems

Conform to strict requirements for biodegradability

Reduce packaging waste.

For more information: <http://www.eco-label.com>

4-1-2 ECOCERT

Groupe GM's factories received ECOCERT certification, which means we can manufacture ecological and organic products.

What is ECOCERT certification?

ECOCERT is a control and certification organisation whose activities are governed accordingly by the public authorities and legislation. ECOCERT works to promote organic products through its control and certification activities in over 80 countries. Its wealth of contacts, its experience acquired in the field and the rigorous nature of its controls lend ECOCERT international credibility. www.ecocert.com

To claim to be organic, a cosmetic product must meet precise specifications elaborated by a control and certification body that guarantees the genuine practice of environmental respect throughout the production line, respect for the consumer and the promotion of natural substances of a superior ecological quality. For more information: www.ecocert.com

4-1-3 COSMEBIO

Groupe GM is a COSMEBIO association member.

COSMEBIO is the Professional Association of Ecological and Organic Cosmetics, which gathers the whole of the actors of the network (raw materials and ingredients suppliers, manufacturers, cosmetic laboratories and distributors).

For more information: www.cosmebio.com

4-2 We develop ecological packaging:

All our products are manufactured **with respect for the environment and we promote ecological packaging solutions:**

All our bottles, caps and dispensers are made of **recyclable plastics** and are marked with a plastic type number **for recycling purposes.**

For offset printing of our cardboard boxes we use **water-based varnish.**

We design large conditioning units and offer a wide selection of dispenser bottles from 250 ml to 500 ml (Ecopump and Ecopearl).

We have developed a revolutionary ecological dispenser **ECOSOURCE airless dispenser.** It is the first dispenser of preservative free cosmetics thanks to airless technology, thus offering a unique combination of quality, innovation and security.

Nordic ecolabelled (the Swan Label) and with EU Eco-label certification (the "Flower"), **ECOSOURCE airless dispenser** is an innovative system based on airless refill bags allowing for a formulation without preservatives. This avoids any risk of oxidation or bacterial contamination and allows the liquid to remain fresh and clean at all times.

Ecological and economical packaging:

no wastage: 98% usable liquid

controlled dispensed measure - one push provides 2ml of liquid

the weight of the emptied bag is only 11g of environmentally friendly plastic

dispenser holder made in recyclable ABS material

Ecological formulation

no preservatives

no parabens

no colouring agents

We listen to our customers needs and we carefully look into all product **innovations** especially new environmentally friendly packaging such as:

Biodegradable bottles and trays made in PLA

Biodegradable bags (laundry and sanitary bags for example).

Packaging made of **recycled materials**, known as PCR (Post Consumer Recycled Plastic)

We recently introduced a revolutionary tube made from one single piece of LDPE material, which makes it a user-friendly and ecological product and we continually invest in similar projects.

4-3 We offer ecological formulations

4-3-1 Our standard formulations contain:

No parabens
No silicone
No GMO's
No formaldehydes
No PEG
No petrochemical surfactants
No animal derived ingredients
They are not tested on animals
They are biodegradable at more than 90%
They are dermatologically tested
Our finished products or packaging do not undergo ionising treatments

4-3-2 We offer natural formulations:

They have the same features as our standard formulas with the following additional specific features:

- natural enrichment 99.8%
- natural fragrance 100% - no chemical perfumes.
- no colouring agents

4-3-3 We offer organic formulations, certified by ECOCERT and COSMEBIO:

We are authorised to place the COSMEBIO label on certain cosmetic products certifying that a minimum 10% of our total ingredients come from organic farming.

Here are the main principles of ECOCERT and COSMEBIO certification:

- Nature must be fully respected (respect of ecosystem balances, no testing on animals)
- The procedures for obtaining the ingredients must be non-polluting
- The wrappings and outer packagings must be biodegradable or recyclable
- The consumer must be provided with full transparent information on the ingredients used and all the manufacturing stages through to the finished product.
- The percentage of natural ingredients and the percentage of organic natural ingredients must be clearly indicated on all certified product packagings bearing the organic or environment-friendly logos

- Minimum 95% of ingredients are of natural origin
- Minimum 10% of ingredients come from organic farming
- Without synthetic fragrances or colourings
- Total barring of synthetic preservatives, such as parabens or phenoxyethanol
- No petrochemical products (paraffinum, silicone, PEG)
- No GMO (genetically modified organisms)
- No ionising treatments
- No animal testing

4-3-4 We also offer ECOLABEL formulations with the following objective:

Reduction of water pollution by limiting the quantity of potentially harmful ingredients and the total toxic load of the product.

Minimisation of waste production by reducing the amount of packaging.

Reduction or prevention of potential risks for the environment related to the use of hazardous substances.

Distribution Network – worldwide

GroupeGM agents are expected to rigorously follow Groupe GM's environmental policy guidelines.