



FOREWORD

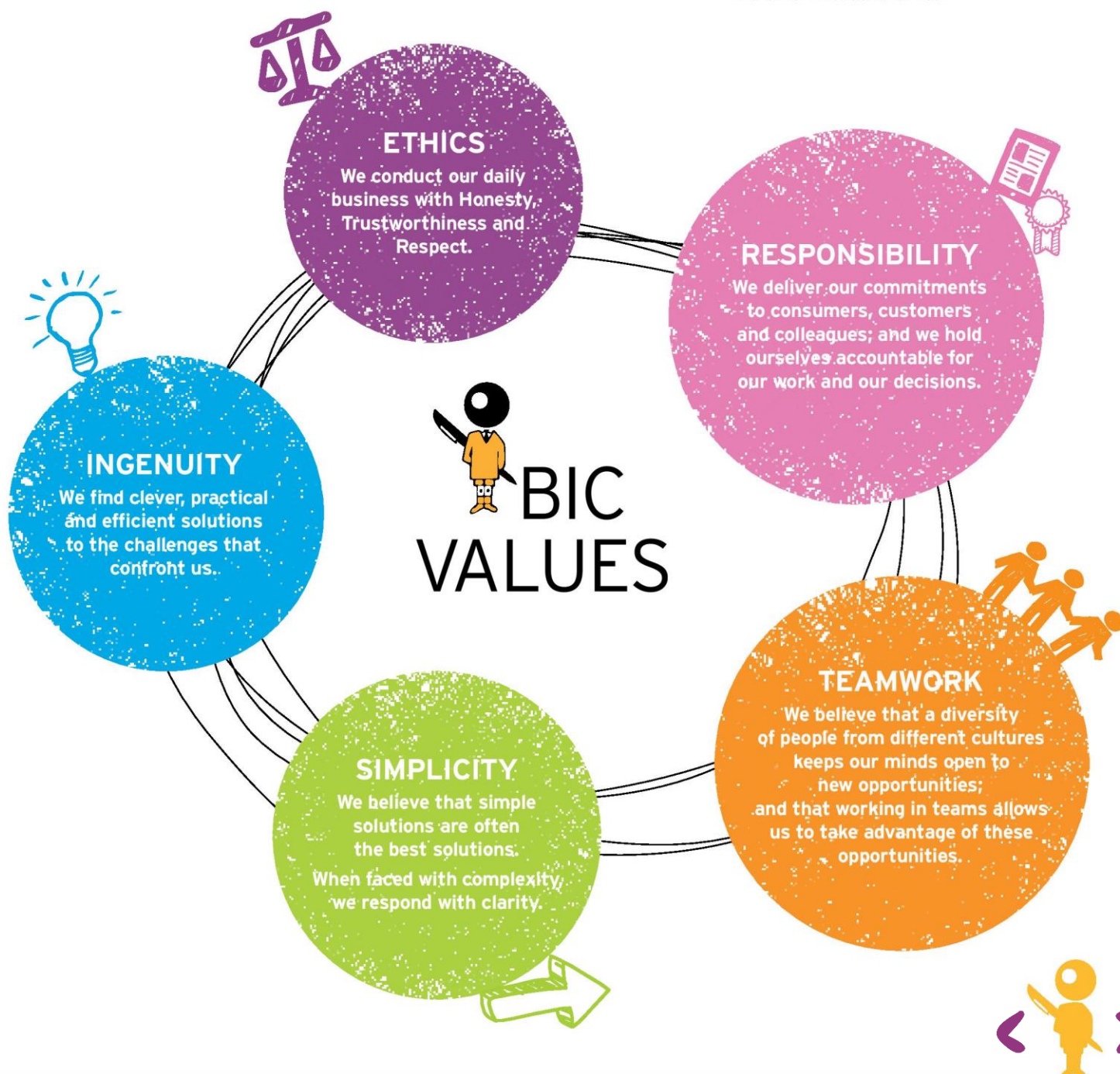


Ethics, Responsibility, Teamwork, Simplicity and Ingenuity.

Each day these five Values guide BIC's business and we believe they are an appropriate and strong foundation for a sustainable business model. Consistent with these Values, BIC establishes mutually beneficial relationships with business partners who provide materials or services for the manufacture and distribution of BIC products.

MARIO GUEVARA

BIC Chief Executive Officer





SUMMARY

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RESPONSIBLE PURCHASING CHARTER

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RESPONSIBLE PURCHASING CHARTER

Mar-14

Ethics, Responsibility, Teamwork, Simplicity and Ingenuity.
Each day these five Values guide BIC's business and we believe they are an appropriate and strong foundation for a sustainable business model. Consistent with these Values, BIC establishes mutually beneficial relationships with suppliers who share our commitment to pursue sustainable, simple and inventive solutions that help us conduct business in a socially, environmentally and ethically responsible manner.

This Charter is applicable to business partners who provide materials or services for the manufacture and distribution of BIC products.

Ethics

Ethical conduct is a fundamental BIC Value and a significant contributor to our success. BIC is committed to maintain our reputation for high ethical standards, compliance with the law, and avoidance of conflicts of interest. We seek mutually respectful, fair and equitable relationships with individuals, communities and business partners. BIC has established clear expectations for our own employees and operations. These same expectations are appropriate for our business partners, and include:

- **BIC Group Code of Ethics** - This Code summarizes our ethical principals regarding human rights, respect for the environment, compliance with the law, listening and communicating, conflicts of interest, and others.
- **Purchasing Golden Rules** - These Rules outline simple commitments to help ensure an ethical, equitable, transparent and cooperative business relationship.

Responsibility

BIC has always been committed to provide exceptional value to our customers and consumers. Part of this value is the fulfillment of our responsibilities to help ensure a safe, healthy and sustainable future for our employees, consumers, customers, suppliers and communities. These responsibilities include proactive approaches to fair business practices, respect for human rights, safe working conditions, environmental protection, product safety, regulatory compliance, and continuous improvement. We hold ourselves and our business partners accountable for the following environmental and social commitments:

- **BIC Code of Conduct** - The Code details BIC's expectations of suppliers with respect to work environment, fair and ethical employment practices, animal testing, environment health and safety, and compliance monitoring.





RESPONSIBLE PURCHASING CHARTER

- **BIC Environmental, Health and Safety Policy** - This Policy outlines BIC's approach to protecting the environment, our employees, our communities, and our consumers, requiring broad commitments to pollution prevention, risk prevention, regulatory compliance, continuous improvement, and awareness and involvement of stakeholders.
- **Product Safety Guidelines** - BIC's guidelines for product safety establish expectations for the development and manufacture of safe consumer products. Our requirements include a product qualification process, regulatory compliance reviews, product testing and a proactive approach to safety innovation, consumer education and incident investigation and response.

Teamwork

At BIC, we view our suppliers as an important asset; as partners in our pursuit of sustainable business. Our business partners often bring a new perspective and fresh ideas to help us develop improvement opportunities for mutually beneficial and sustainable business. Our suppliers must share our drive to continuous improvement and help BIC meet our sustainability goals.

Simplicity

At BIC, we believe that complex problems are best solved with simple and unambiguous solutions. In keeping with our value of Simplicity, we provide guidelines for each supplier category in the scope of this Responsible Purchasing Charter. These guidelines simply and clearly identify BIC's expectations of our business partners. Some of the tools that we use to help ensure alignment with our suppliers include goal setting, performance measures and audits. These guidelines are communicated to each supplier category.

Ingenuity

Through the principles in this Charter and its associated guidelines, we believe that BIC and our business partners can foster innovative, creative, cost-effective and sustainable solutions in our drive for continuous improvement.





BIC GROUP CODE OF ETHICS AND GUIDE

Jan-07
Rev.#2 Apr-14

Without ethics nothing can be sustained.

Ethics is at the heart of BIC's philosophy and has been the cornerstone of the basic business principles which drive BIC's success. BIC's reputation for integrity, honesty and fair dealing was well established long before our Code of Ethics was written.

Our goal is to build relationships with all of our stakeholders – employees, customers, suppliers, shareholders, and regulators – based on honesty, trust and respect.

Ethics is based on standards and principles of behavior endorsed, supported, and practiced by all of our managers and employees around the world.

The purpose of this Code is to formalize the fundamental ethical principles of BIC so that everyone can refer to it and conform to it in all circumstances. The goal is to build and maintain a culture within BIC that does the right thing day in and day out.

The standards are not intended to be exhaustive but rather represent essential reference points for all BIC employees and partners. Throughout the Code, questions provide guidance for identifying when an ethical issue may be present and require action.

It is everyone's responsibility to abide by and practice these standards on a daily basis, thereby maintaining and enhancing BIC's global reputation as a trustworthy partner.

Inherent in the standards is our responsibility to reject any attitude or behavior contrary to the Code.

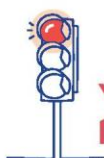
Any questions, concerns, or issues regarding the Code of Ethics should be addressed in any language to the following individuals, who have been designated as mediators and ethics officers for the BIC Group.

Marie-Aimée Bich-Dufour

*Executive Vice-President
General Counsel
Société BIC*

Steve Burkhart

*Vice-President
General Counsel
BIC Corporation*



You may be about to overstep a limit when you hear the following:

- "No one need know..."
- "The end justifies the means..."
- "Everyone does it..."
- "Just this once..."
- "It's always been done this way..."
- "We don't have to mention that..."
- "I'm saying this off the record..."
- "It seems too good to be true..."
- "Turn a blind eye to..."
- "It's not serious..."



If you are still not sure, ask yourself:

- "Does this fit in with the Group's values? Its operational standards?"
- "Do I find this decision ethically problematic?"
- "What if this was reported in the newspaper?"
- "What if it was being done to me, rather than me doing it to others?"
- "Is this honest?"
- "What if my children, my parents, my friends, my colleagues, etc., knew about this?"
- "What if everyone did this?"





BIC GROUP CODE OF ETHICS AND GUIDE

Standards

Fundamental Human Rights

- **BIC abides by the International Labor Organization conventions** regarding the protection of workers and the ban on forced labor and child labor. BIC requires its suppliers to do the same.
- **BIC employs workers based on ability to perform a job task and does not discriminate**, for any reason whatsoever, in the recruitment of employees, in the development of skills and careers and more generally in relationships at work.
- **BIC does not tolerate any form of moral or sexual harassment** and prohibits any behavior likely to create an intimidating, hostile or offensive work environment.

? Questions

Do I have my doubts as to my supplier's compliance with employment legislation?

Am I sure that in my department the basic rules are known and applied by everyone, in particular regarding safety and working hours?

Is it certain that I have avoided behaving in a way that some of my colleagues may find offensive or humiliating?

Would I have behaved in the same way with a colleague of the opposite sex?

Am I certain of my objectivity when it comes to assessing the performance of my colleague?

Would I find it acceptable if my colleagues behaved the same way with me as I do with them?

Do I tend to blame one individual colleague for all the department's problems?

? Questions

Do I have my doubts as to the guarantees I receive from my supplier with regard to protection of the environment?

Do I know for sure that my colleagues are familiar with and apply BIC Group's Environment, Health and Safety policy?

Are my actions in the office "environmentally-friendly"?

Do I definitely avoid waste? Do I make every effort to encourage my colleagues to adopt less wasteful behavior?

Can we lessen the environmental impacts of the project we're beginning?

Respect for the Environment

- **BIC has enacted an Environment, Health and Safety Policy**, continually monitors its application and asks that all its suppliers and contractors operating on BIC sites exercise the same vigilance.
- **BIC's focus is on the continual improvement** of the environmental performance of our factories. In particular, BIC strives to minimize the impacts of its operations.
- **When designing and manufacturing its products, BIC continually strives** to utilize innovative technical solutions to minimize the impact on the environment.
- In addition, **BIC actively promotes environmentally friendly practices** in all of our offices and encourages each of our employees to adopt behaviors to avoid wasting energy and natural resources.

? Questions

Do my colleagues feel they can freely express their opinions?

Do I ensure that my colleagues behave in a courteous manner in their dealings with other departments within the BIC Group, and with their suppliers?

Am I diligent in acting upon the comments I receive from our employees?

Have I elevated my specific legal or ethical concern to my supervisor, the designated Ethics mediators or my Human Resources representative?

Listening and Communicating

- **BIC is committed to developing relationships and celebrating diversity** throughout the organization based on respect and trust.
- **The BIC Group intends to foster and maintain a responsible social dialogue.** BIC is committed to making complete, timely and accurate disclosures to our employees. The Company has a responsibility, both legally and ethically, to communicate effectively and candidly with our employees.





BIC GROUP CODE OF ETHICS AND GUIDE

Compliance with the Law

- **BIC complies with all laws and regulations and asks its suppliers to do the same.**
- **BIC is committed to complying with all applicable anti-corruption laws and regulations.** Many governments have implemented laws to prohibit the making or offering of bribes and facilitation payments to government officials in connection with obtaining or retaining business, influencing any official act or securing any other improper advantage.
- In particular, **all employees are instructed to strictly respect all laws and regulations** relating to, among other things, anti-corruption, competition, intellectual property, labor and employment, safety, health, and the protection of the environment.
- **BIC encourages its employees to be involved in their local community**, however, BIC funds and other group assets may not be used, either directly or indirectly, to benefit political organizations or political candidates. A political contribution includes both direct (i.e., money) and in-kind contributions. In-kind contributions include the purchase of fundraising tickets, contribution of products, volunteer work by employees within normal business hours and the use of BIC facilities for fundraising or political purposes.
- **The operational responsibility for BIC's relationships with public authorities and institutions is delegated to a small number of specifically identified senior managers**, who have been named to represent the Group.

? Questions

Have I checked that I am complying with the regulations on consumer health and safety and the environment? Am I operating in line with current standards and legislation in the countries where our products are sold?

Am I certain that my distributor's activities comply with the Law and are not conflicting with the BIC group's interests?

Should I consult the Human Resources department and/or the Legal department about this matter? Have I properly implemented the recommendations of the Human Resources department and/or Legal department?

Have I obtained information regarding my competitor in a legal way?

Am I or my colleagues fully aware of the laws applicable to my/their job responsibilities?

Do I know who has the authority to speak on behalf of the organization?

Principles of Behavior

? Questions

Am I careful to avoid situations where my own interests could enter into conflict with the interests of the BIC Group or might influence my judgment or actions in performing my job?

Do I know for sure that my professional activities outside BIC do not have a negative impact upon the BIC Group or impact my ability to devote appropriate time and attention to my job responsibilities?

Conflicts of Interest

Each employee must avoid any situation where a conflict exists between the Group's interests and the personal interests of the employee or his/her family members.

In particular, each employee is prohibited from:

- **Acquiring any ownership or other financial interest in any competitor, supplier or customer** that would conflict with his/her responsibilities to BIC.
- **Conducting any external business or professional activity** that would be contrary to the interests of the Group, including with a competitor, supplier, or customer.





BIC GROUP CODE OF ETHICS AND GUIDE

Questions

Do I know for sure that I have supplied the right information to the right people?

Am I careful to avoid indiscretions regarding BIC Group internal projects in social conversations or business relations with suppliers, customers and others?

Am I fully aware of the level of confidentiality of the information I receive? Am I fully aware of what information I should be supplying to each of my colleagues given the level of confidentiality?

Have I protected confidential information which must be disclosed outside the BIC Group with a Confidentiality Agreement and appropriate approvals and protections?

Professional Commitment

- Each employee shall conduct himself/herself **with the highest degree of professionalism and collaboration**, thereby helping to ensure that the Group's standards are maintained.
- Each employee shall be committed to **fostering a climate of trust and close collaboration** with his/her colleagues and shall not condone or tolerate any discriminatory, offensive or inappropriate behavior.
- Each employee shall be committed to **delivering quality work in a timely manner** and shall always be aware of the needs and expectations of his/her colleagues.

Questions

How long is it since I asked myself: "Is this project being implemented in accordance with the BIC Group operational principles"?

Am I careful to create the right conditions for a calm working environment?

Am I clearly intransigent in dealing with discriminatory, offensive and degrading behavior?

Questions

Do I know for sure that all my colleagues are aware of, and apply, principles of integrity, fairness and honesty in their dealings with participants in their projects?

Do I ever give or receive gifts of a value greater than is customary under the circumstances?

Do I know for sure who to turn to if I have received a gift and am unsure of its value?

Do I know for sure that the use I am making of BIC Group resources will not put the company in an awkward position?

Relationship with Stakeholders

- Each employee must **follow the principles of integrity, honesty and fair dealing** in all of his/her dealings with the Group's stakeholders.
- When dealing with customers, suppliers and other third parties, each employee is committed to **conducting himself/herself objectively** and only in the best interests of the Group.
- Each employee **is prohibited from soliciting or accepting, directly or indirectly, any gifts** with an economic value that exceed acceptable business practices.
- No employee shall **condone the use of Group funds, assets or property for any unlawful or improper purpose**. In particular, BIC does not tolerate any form of bribery and corruption.

The Code of Ethics does not address all workplace conduct. BIC maintains additional policies and guidelines that may provide additional guidance. If there are local rules that supplement this Code of Ethics, including at the local country level, an Addendum will be attached.

Ethics is the cornerstone of the BIC values and has been an essential element of the basic business principles which drive BIC's success.





PURCHASING THREE GOLDEN RULES

Jan-07

Contribution and Loyalty towards commitments and values of the Company

BIC and all subsidiaries of the Group apply and respect its proper values in all areas. Each Buyer takes an active part in respecting these values which are articulated around ETHICS, Professionalism, International Opening and Team Spirit.

The Purchasing Department accepts to prove its involvement towards those values in its day to day actions.

Each member of the team commits himself to putting his professional skills at the best level. Besides, he agrees to contribute and make his skills available to BIC in order to implement and respect the principles and values of the Group in the same spirit of solidarity.

The buyer agrees himself to develop skills such as Probity, Loyalty, Transparency, Firmness, Fairness, and to think of our business towards team spirit, Professionalism, and respect of Ethics in all occasions.

Rule No.1

A normalized behavior with the suppliers: equitable, unbiased, and transparent

The Buyer or each partner of BIC in position to purchase, agrees to:

- Treat our suppliers with loyalty, transparency, and a spirit of mutual respect. Omissions, or inaccuracies could only be unintentional and laps of memory.
- Do not take advantage of obvious errors.
- Confidentially keep and handle all information delivered by the supplier. The same processing should be applied to prices given by the suppliers and the technology used.
- Communicate the results of the selection to those suppliers not selected.
- Issue the same level and content of information to all suppliers.
- Communicate the method of selection and accurate the attribution criteria of the market. Those criteria must be tough but reachable and no counterpart associated.
- Respect the laws, engagements, and commitments mutually accepted.
- Settle fairly, rapidly and as factual as possible the disagreements that could step in during the execution of the contract.





PURCHASING THREE GOLDEN RULES

- Do not abuse of a significant position in the market as customer.
- Do not exceed a acceptable percentage of reliance towards a supplier who is not incompatible with the consistency and solidity of the two companies.

Rule No.2

Irreprocheable ethics of the purchaser

The Buyer or each partner of BIC in position to purchase, agrees to:

- To keep in all occasions its self-reliance in front of the supplier notably in refusing any gifts or invitations, which should in nature to false his own judgement or harm the BIC reputation.
- Do not break any commercial rules in nature to false the equity of the contracts.
- Do use exclusively legal and equitable means to evaluate the suppliers and their abilities to supply BIC.

Rule No.3

A vigilant contributor to support BIC sustainable development program

The Buyer or each partner BIC in position to purchase, agrees to:

- Integrate with each of our suppliers' business relationships all principles and Environmental and society issues as criteria of both supplier and product selection.
- Include the purchasing code of ethics in our requests for quotes.
- Monitor and Audit the suppliers, if needed be, to validate the respect of these rules by our suppliers.





BIC GROUP CODE OF CONDUCT

Oct-04
Rev.#1 Sep-12

1. Statement of Principles

The BIC Group strives to make BIC a special place to work, with an atmosphere of mutual respect and professionalism. BIC Group, its Contract Manufacturers and its business partners including material suppliers and carriers "Business Partners" all have a responsibility to uphold these principles by creating an atmosphere in which each employee knows that he/she is valued as an individual and treated with respect and professionalism. The BIC Group Code of Conduct ("Code of Conduct") enables us to conduct our business, source production and manage our supply chain in a manner that is both profitable and socially responsible.

Implementation of this Code of Conduct enables BIC to continually improve performance on worker's rights, labor standards, and other human rights issues integral to the production process and the overall supply chain.

Compliance with this Code of Conduct is mandatory for all BIC entities and for all BIC product Contract Manufacturers and Business Partners. BIC reserves the right to immediately terminate its business relationship and cancel all orders with any Contract Manufacturer or supply chain partner who does not comply with this Code of Conduct.

2. Work Environment

BIC is committed to treating all its employees with dignity and respect and providing its employees with a safe, healthy, clean and well-lit work environment including appropriate and adequate facilities and protection from hazardous materials or conditions. BIC expects its Contract Manufacturers and Business Partners to maintain the same standards in their factories and operations. All BIC entities, BIC Contract Manufacturers and Business Partners must comply with all applicable local laws and regulations governing working conditions. If housing is provided for employees, all housing must be maintained in a clean, safe fashion. BIC strictly forbids the use of cruel and unusual disciplinary practices in the workplace.





BIC GROUP CODE OF CONDUCT

3. Engage in Fair and Ethical Employment Practices

Fair Wages and Reasonable Working Hours

BIC, its Contract Manufacturers and Business Partners must fairly compensate their employees by providing wages and benefits and reasonable work hours in compliance with local standards and applicable laws of the countries in which BIC, its Contract Manufacturers and Business Partners are doing business. BIC, its Contract Manufacturers and Business Partners must compensate their employees at a rate equal to, or greater than, the prevailing local minimum wage, including piece rate workers. No employees shall be required to work more hours than the limits on regular and overtime hours prescribed by applicable law. All overtime work shall be voluntary. No employee shall be made to work overtime under the threat of penalty, dismissal or denunciation to authorities or as a disciplinary measure or for failure to meet production quotas. Except in extraordinary business circumstances, employees must not be required to work more than 60 hours per week, inclusive of overtime. If applicable law does not provide for overtime pay, employees will be compensated for overtime at a rate equal to or greater than the prevailing local minimum wage. In addition, except in extraordinary business circumstances, employees will be entitled to at least one rest day off in every seven-day period.

Child Labor

BIC will not accept the use of child labor in its operations under any circumstances and will not purchase product(s) from any Contract Manufacturer or Business Partners that use child labor. In determining whether a laborer is a "child," BIC will refer to the local legal minimum age for employment or the age for completing compulsory education in the country of manufacture. However, the minimum age shall never be younger than 14 years of age. Although BIC strictly prohibits the use of child labor, BIC supports the development of legitimate workplace apprenticeship programs for the educational benefit of younger people.

Forced or Compulsory Labor

BIC will not support trafficking in human beings or accept the use of forced, compulsory, bonded, indentured or prison labor in its operations under any circumstances and will not purchase product(s) from any Contract Manufacturer or utilize any supply chain partner that supports trafficking in human beings or utilizes forced, compulsory, bonded, indentured or prison labor. Every employee must be a voluntary worker with the freedom to leave the workplace outside of work hours and terminate employment at any time without penalty after notice of reasonable length. Forced prison labor, or work against the will of an employee, including work required as a means of political coercion or punishment for expression of political views is strictly forbidden. No employee shall be subject to any form of harsh or inhumane treatment, corporal punishment, threats of physical or sexual violence, or other forms of psychological or physical harassment, intimidation, abuse, coercion or sanctions that result in wage deductions, reductions in benefits or compulsory labor. No part of an employee's salary, benefits, property, or documents shall be withheld in order to force such personnel to continue working.





BIC GROUP CODE OF CONDUCT

Discrimination

BIC employs workers based on ability to perform a job task, not on the basis of personal characteristics, beliefs or any form of discrimination and expects its Contract Manufacturers and Business Partners to employ workers on the same basis. BIC, its Contract Manufacturers and Business Partners shall comply with all local anti-discrimination laws and regulations.

Freedom of Association

BIC respects the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference, and expects its Contract Manufacturers and Business Partners to respect the same rights.

Legal Compliance

BIC, its Contract Manufacturers and Business Partners shall comply with the legal requirements and standards of their industry and the laws of the countries in which BIC and/or its Contract Manufacturers are doing business. BIC, its Contract Manufacturers and Business Partners shall comply with all applicable export and import requirements. Necessary invoices and required documentation must be provided in compliance with applicable law. All merchandise shall be accurately and clearly marked with its country of origin in compliance with applicable law.

4. Animal Testing

BIC is committed to providing consumers with the highest quality products, which comply with all applicable product safety standards. Our goal is to ensure that our products are of the highest quality through the use of non-animal testing alternatives. BIC has declared a worldwide moratorium on all animal testing. If a BIC Contract Manufacturer believes that alternative testing cannot provide sufficient assurance that a new product is safe for consumer use, they should advise BIC in writing.

5. Environment, Health and Safety

BIC has maintained a long standing commitment to protect the environment and safeguard the health and welfare of its employees, neighbors and consumers. BIC recognizes that nearly every aspect of a manufacturing business has a potential to impact the environment, human health or safety. It is BIC's responsibility to minimize those impacts and develop solutions that protect people and the environment and allow BIC to maintain the product quality and value that consumers demand. BIC's approach is to collaborate with its employees, suppliers, carriers, customers and consumers to identify, assess and minimize the environmental, health and safety impacts resulting from BIC's manufacturing and supply chain operations and the manufacturing and supply chain operations of BIC's Contract Manufacturers.





BIC GROUP CODE OF CONDUCT

6. Monitor Compliance

BIC conducts regular assessments of its facilities and the facilities of its Contract Manufacturers to ensure compliance with this Code of Conduct. All BIC Contract Manufacturers will authorize BIC's independent third party monitor to inspect their facilities to ensure compliance with this Code of Conduct.

7. Publication

Contract Manufacturers will take appropriate steps to ensure that the provisions of this Code of Conduct are communicated to their employees, including the prominent posting of a copy of this Code of Conduct, in the local language and in a place readily accessible to their employees, at all times.

8. Certification

The BIC Group Code of Conduct clearly states BIC's commitment to legal, ethical and appropriate working conditions worldwide. The undersigned authorized representative of the below-named Company has read the standards described in the BIC Group Code of Conduct and understands that a continuing business relationship with BIC is dependent upon adherence to the standards set forth therein. Any failure to follow these standards may result in the cancellation by BIC of outstanding purchase orders, refusal by BIC to accept delivery of merchandise and the termination of BIC's business relationship with you.

Company Name

BY: _____
Signature of Representative

Title

Date





ENVIRONMENTAL, HEALTH AND SAFETY POLICY FOR THE BIC GROUP

Apr-05

Responsibility and Challenge

Ethical conduct toward our employees, consumers, customers, suppliers and shareholders is a fundamental and pervasive operating principle within the BIC Group.

Accordingly, BIC has maintained a longstanding commitment to protecting the environment, as well as safeguarding the health and welfare of our employees, neighbors and consumers.

We recognize that nearly every aspect of a consumer products business, including the production, distribution, and end disposal of a product and its packaging, has a potential to impact the environment, human health or safety.

It is clearly our responsibility to minimize those impacts. The challenge is to develop solutions that protect people and the environment and allow us to maintain the product quality and value that consumers demand. BIC accepts this responsibility and this challenge.

Our approach is to collaborate with our employees, suppliers, customers and consumers to identify, assess and minimize the environmental, health and safety impacts resulting from our manufacturing operations, our products, and our product packaging.

The BIC Group pledges the following as a matter of global Environmental Health and Safety (EH&S) policy:

Pollution Prevention

Maintain a coordinated program at each BIC facility to identify and measure environmental impacts of our operations and products and take targeted action to minimize those impacts.

Risk Prevention

Operate and maintain our facilities to prevent, or at least minimize, risks to the health and safety of our employees, subcontractors and surrounding communities.

Regulatory Compliance

Diligently comply with all local environmental and safety regulations.

Continuous Improvement

Integrate EH&S management systems into our daily operations to maintain commitment and deliver continuous improvement.

Awareness and Involvement

Maintain the awareness and involvement of our employees and other stakeholders in our improvement efforts. Communicate our EH&S performance to all stakeholders.

Bruno BICH,
Chairman and Chief Executive Officer





BIC PRODUCT SAFETY GUIDELINES

May-01

1. **All new or redesigned BIC products must successfully complete a product safety qualification process before the product is distributed.**

Consumer safety is an essential business priority. We want to ensure that BIC products are designed and produced to be safe for health and for the environment when used as intended or when the use of the product is reasonably foreseeable.

2. **When we design or redesign a BIC product, we think global. A new product usually meets global safety requirements even if it is intended for a local market. As a result, products often exceed local safety requirements.**

We want product formulations and product designs to meet the highest safety level.

3. **When we design or redesign a BIC product, we ask our suppliers to be involved in ensuring its conformity with safety rules and regulations. They sign a compliance statement agreeing to a list of safety requirements.**

We want all partners' commitment when product safety is concerned.

4. **When we design or redesign a BIC product, we do safety testing. These tests evaluate potential physical hazards, chemical hazards or flammability.**

We focus on the product characteristics to ensure that all testing is relevant and appropriate.

5. **We keep current on new local, national and international standards, laws and regulations addressing product safety. We work with authorities in drafting standards and regulations.**

Compiling the existing requirements is the first step in building our safety policy.

6. **BIC implements the latest developments in product safety.**

We are proactive as soon as the safety innovations have a sound technical and scientific basis.

7. **We try to educate consumers about product safety. Labelling and warnings on packaging are part of this education. We provide information about the proper use of our products.**

As a responsible company, we expect consumers to act responsibly.

8. **BIC investigates incidents that involve product safety. We have set up internal processes in order to identify product issues as quickly as possible.**

9. **BIC has appropriate product recall procedures in place.**

10. **A senior product safety officer oversees implementation of the BIC Product Safety Guidelines.**



