

NON-ANIMAL TESTING STATEMENT

Oleon does not make use of any animal testing insofar as legally possible.

To further clarify Oleon's position on animal testing¹, it is important to give some more detail on the complicated EU regulatory framework of which we are part.

The EU initially banned testing in September 2004 for finished cosmetic products and March 2009 for cosmetic ingredients or combination of ingredients. Subsequently the European Parliament and the Council extended the deadline for the most complex human health effects to be tested². Animal testing on all cosmetic products and ingredients has finally been banned since March 2013 through the EU Cosmetics Regulation (EC) No 1223/2009.

Oleon fully supports the 3R principle (Replace, Reduce, Refine)³ and is committed to not using animal testing unless legally impossible.

On the other hand, Oleon has a responsibility to its customers to assure that its products are safe for people and the environment. It is a legal obligation to demonstrate the safety of our products with toxicological and ecotoxicological data to protect workers and consumers. In this regard, and despite the REACH principle *in vitro*⁴ first, competent authorities such as ECHA⁵, to meet the EU REACH Regulation (EC) No 1907/2006, may still require data from animal testing, which may remain the only possibility to generate these scientific data.

In this case Oleon seeks:

- **To not conduct animal testing** for purposes of the abovementioned European Cosmetics Regulation
- **To use alternative recognized methods:**
 - To rely on already available published data in scientific literature
 - To use other methods based on similar chemical substances, including read-across, grouping and weight-of-evidence approaches
 - To use alternative suitable and valid *in vitro* methods accepted by the authorities, whenever legally possible

Animal testing required by competent authorities may have no existing validated alternative *in vitro* test yet. Despite this conflict between the EU Cosmetics and REACH Regulations, Oleon is convinced that animal testing can be avoided in many circumstances. We are committed to and actively engaged

in the resolution of this contradiction in order to avoid animal testing. We believe that it is the responsibility of our industry to make the European authorities aware of the regulatory deadlock.

Oleon's belief is strengthened by the recent adoption by the European Parliament of the 16th of September 2021 Resolution on "Plans and actions to accelerate a transition to innovation without the use of animals in research, regulatory testing and education". This Resolution adds weight to the industry's fight to ban animal testing. The European Commission is expected to respond to this vote by the end of 2021.

You may count on Oleon to actively address regulatory discrepancies on this topic as we believe in an oleochemical industry without animal testing whatsoever.

Should you have any additional questions, please don't hesitate to reach out to your Oleon contact.

Yours truly,

Moussa Naciri,
CEO Oleon

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¹ Animal testing, or *in vivo* testing, has the meaning given in the article 3 of the Directive 2010/63/EU on the protection of animals used for scientific purposes, namely "any use, invasive or non-invasive, of an animal for experimental or other scientific purposes, (...) which may cause the animal a level of pain, suffering, distress or lasting harm equivalent to, or higher than, that caused by the introduction of a needle in accordance with good veterinary practice". In the article 1 of the same Directive, an animal is understood as "live non-human vertebrate animals (including independently feeding larval forms and foetal forms of mammals as from the last third of their normal development) and live cephalopods".

² Repeated-dose systemic toxicity, skin sensitization, carcinogenicity, reproductive toxicity and toxicokinetics

³ This principle was introduced in the Directive 2010/63/EU and is promoted by the EPAA (European Partnership for Alternative Approaches to Animal Testing). The EPAA "aims to replace animal testing by innovative, non-animal testing methods, to reduce the number of animals used and to refine procedures where no alternatives exist or are not sufficient to ensure the safety of substances".

⁴ ECHA defines *in vitro* testing as a test "done outside of a living organism"

⁵ ECHA: European Chemicals Agency