

code of ethics

Pettenon Cosmetics

Code of Ethics

2024

Pettenon Cosmetics S.p.A. Benefit Corporation
Via del Palù 7/D, 35018, San Martino di Lupari, Padua (IT)
Padua Company Register No., Tax Code and VAT No.: 04937500280
Share Capital of 7,500,000.00 euros, fully paid-up

Shareholders' letter

Dear Collaborators, From the very outset of our entrepreneurial adventure, we have built our company on the values passed down to us by our parents: respect, integrity, transparency, gratitude and the desire to inspire others with responsible behaviour. These principles have not only guided our personal lives, but have become the very foundation of the corporate culture we have created at Pettenon Cosmetics.

We firmly believe that every person and every company has a social responsibility. Each of us sets an example, not only for

colleagues and collaborators but also for customers, suppliers and, more generally, the communities where we are based.

We therefore invite you to devote time and attention to reading our new Code of Ethics, reflecting on its contents and adopting it as a guide in your day-to-day work. Its true value will emerge by applying its principles in practice each day.

With all our respect and gratitude,

Federico Pegorin
Executive President



Gianni Pegorin
Vice President



Letter from the CEO

Dear Colleagues,

I am delighted to present to you the new edition of our Code of Ethics, a document that brings together the fundamental values and principles on which our company is based.

This update is an opportunity not only to reaffirm our commitment to transparency, legality and integrity, but also to emphasise our responsibility as the Pettenon Cosmetics Group and as individuals.

Ethics is the bedrock on which we build our work every day: it guides our choices, strengthens mutual trust and allows us to grow in a fair and sustainable way.

Being an ethical company does not only mean complying with regulations: it means acting consistently, responsibly and respectfully in every interaction, because ethics is the beating heart of our identity and the driver of our success – now and in the future.

The Code of Ethics is more than just a document – it is a guide for us all, regardless of our role or the place where we work. It is a shared tool that helps us to operate in line with our values at all times, promoting

an inclusive, safe and respectful working environment. Applying it consistently means building and maintaining trusting relationships with colleagues, customers and stakeholders.

I invite you to read the Code of Ethics carefully, reflecting on its principles and integrating them into your day-to-day work. Only through our ongoing commitment can we continue to set an example of excellence, consolidate our reputation and create value for the people and communities with whom we interact. Our success depends on how well we are able to turn these values into concrete actions.

“Ethics is doing the right thing, even when no one is watching.”

In this spirit, we will continue to face every challenge with integrity, working together to build a future founded on responsibility, sustainability and excellence.

With trust and gratitude,

Luigi Ambrosini
Chief Executive Officer





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Introduction

For **75 years**, our company **Pettenon Cosmetics** S.p.A. S.B. (hereinafter also “**Pettenon**” or the “**Company**”) has stood out as a leading 100% Italian company in the Professional Hair & Skin Care sector, promoting **beauty ethically and sustainably** through excellent cosmetic products.

With a presence in more than 90 countries around the world through a multi-brand offering and contract manufacturing, Pettenon is aware that it plays an increasingly important role in the economic, social and environmental aspects of its own community and the countries in which it operates.



Our commitment to the environment, society and governance.

Pettenon stands out in the cosmetics market for its well-established and dynamic approach. It is therefore our responsibility to actively involve all stakeholders – employees, collaborators, customers and suppliers – in our journey, sharing goals and visions for common and sustainable growth. We became a Benefit Corporation in 2021, thus confirming our commitment to enhancing beauty in all its forms, with a dedication that goes beyond aesthetics

to touch the very heart of ethics and sustainability. In particular, we are committed to pursuing five common benefits in our activities, as set out in this document. Our Code of Ethics and its principles form the basis of this commitment and, together with Pettenon's values outlined below, it defines how we work together to approach our business ethically.



Ongoing **research and development of formulas** through innovative techniques used **to reduce consumption and waste of resources**;



Protecting the environment by maximising the use of **sustainable materials and packaging**;



Designing and developing communication and marketing projects aimed at promoting and raising awareness of the value of **multiculturalism and gender equality**;



Support for **training activities** aimed at integration into the world of work;



Support for **charity projects** regarding categories of individuals directly and indirectly involved in the company's activities.

Introduction



Our vision

Meeting every desire for beauty by turning it into a promise of **personal fulfilment**.



Our mission

We meet the beauty desires of every consumer, professional and partner, through a wide range of beauty-care products and services that faithfully honour our 75-year history in Italian beauty: the kind of beauty that is **done well**, accessible to all, tailor-made and of professional quality, while also paying attention to ongoing market changes, and that is **good for you**, because it is sustainable and committed to supporting each and every individual on their path to fulfilment.



Our values

Our entrepreneurial values (hereafter **“Values”**) are rooted in tradition, define our corporate culture and guide our business operations every day, creating the kind of **beauty that is done well and is good for you**.

Pettenon's Values

Italian expertise

For more than 75 years, here at Pettenon Cosmetics we've been handing down and applying our extensive expertise in Italian beauty to professional cosmetics, a heritage rich in ingenuity, creativity and attention to detail. Our story is one of authentic beauty that remains true to its origins and is done well, methodically and professionally. Each day we strive to transform all this into learning and value creation for all our stakeholders, whether internal or external.

People at the centre

In creating beauty, we believe in a people-centric approach, rooted in listening, researching and an ever deeper understanding of the market, the needs and desires of Pettenon People, our partners and customers. By always giving pride of place to people in our work, we strive to promote inclusion, shared growth and personal and professional fulfilment for all.

Conscious innovation

For us at Pettenon Cosmetics, creating beauty is a source of pride and a responsibility. Driven by a passion for continuous improvement that permeates all company functions and processes, we cultivate and enhance our aptitude for innovation every day and across every area.

Sustainable living

Here at Pettenon Cosmetics, social, environmental and economic sustainability is more than just a goal for us: it is a real, day-to-day commitment. It is a way of being and operating that drives our every action and involves us all, enabling us to create value for the company and for communities as a whole.

Inclusive beauty

A positive idea of beauty, one that is capable of embracing differences, evolving with people and their needs and expanding its definition in a way that is always accessible, inclusive and attentive to the market.

Our Code of Ethics

What are business ethics?

The concept of “**ethics**” refers to the set of norms and values that govern an individual’s behaviour in relation to other members of their community so that it may be considered just and fair.

When the community of reference is the company, we may then speak of “**business ethics**” as a set of moral principles that govern the behaviour of a company and the people with whom it interfaces in its organisational and business environment.

For Pettenon, business ethics are essential, representing the **compass** that indicates the right direction for shaping our culture, our values and our employees’ conduct to ensure a fair, just and sustainable working and collaborative environment.

The contents of Pettenon’s Code of Ethics

The purpose of the Code of Ethics is to **establish the general principles** of professional, ethical and responsible **behaviour** for all people working at or with Pettenon.

The ethical principles set out in this Code must be considered as the basis for all policies, codes of conduct and procedures already adopted or to be adopted by Pettenon.



Scope of application and recipients

All references to our “Company” or “Pettenon” in our Code of Ethics refer to Pettenon Cosmetics S.p.A. SB, as well as to its subsidiaries and affiliates over which the Company has control.

The principles set out in the Code of Ethics are intended **to be binding on all employees, collaborators and directors of the Company**, as well as all those who **hold representative functions within the Company or who exercise** management and control duties, **even on a de facto basis**.

In the same way, the Code of Ethics applies to **all companies, suppliers, customers, partners and external collaborators** of any kind, from whom we expect mutual, shared respect for ethical principles.

The aforementioned internal and external recipients shall be referred to from now on as the “**Recipients**” of the Code of Ethics.

1 Responsibilities of Pettenon and the other group companies

The Company undertakes to circulate the Code of Ethics so that it is brought to the attention of all Recipients, as well as to ensure that workers receive adequate training on its contents.

2 Responsibilities of the employees of Pettenon and other group companies

All Pettenon employees are responsible for reading and adhering to the Code of Ethics, and for promptly reporting – in the manner set out in the Code of Ethics – any violations of the law or Code of Ethics of which they become aware.

3 Responsibilities of the management of Pettenon and other group companies

Pettenon’s management is expected to set a good example and take responsibility for promoting a culture of integrity throughout the organisation, observing the principle of “Leadership servant” and working with Pettenon’s Ethics & Compliance Committee.

Our Ethical Principles

The rules of conduct to be followed in day-to-day work

In our day-to-day work, here at Pettenon we accept and share the ethical principles (henceforth, the “**Principles**”) set out in this Code. Following and advocating these principles not only serves to strengthen the foundations of Pettenon’s long-term success, but also creates a positive and stimulating working environment and relationships.

Within the Code of Ethics, each Principle is set out in the following format:

Ethical Principle

General explanation of the Ethical Principle, valid for all Recipients

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees

How our employees should behave

Suggestions and examples

In relations with stakeholders.

How Pettenon behaves towards its stakeholders

If you have any doubts or need clarification on the application and interpretation of the Principles, please speak to the Legal, Corporate Affairs & Compliance Dept. (hereinafter also “Legal & Compliance Dept.”)



Pettenon’s Ethical Principles

- 1 Legality
- 2 Professionalism, reliability and fairness
- 3 Transparency
- 4 Value of the person and human resources
- 5 Inclusion and gender equality
- 6 Protection of the environment
- 7 Supporting the community
- 8 Protection of health and safety at work
- 9 Safeguarding know-how and industrial and intellectual property
- 10 Prevention of corruption
- 11 Prevention of conflict of interest
- 12 Protection of competition
- 13 Prevention of money laundering
- 14 Freedom of association



01

Legality

We are committed to the strictest compliance with current national, EU and international laws when carrying out all our activities.

We are particularly committed to reducing the risks of wrongdoing, through initiatives, procedures and awareness-raising activities.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

Each individual must be committed to acquiring the necessary knowledge to act in accordance with current laws, regulations, procedures and internal policies.

In relations with stakeholders:

For Pettenon, compliance with the law is fundamental to achieving its goals. Therefore, Pettenon will neither initiate nor continue any relationship with those who do not intend to adhere to this principle.

Suggestions

- Always stay informed about new procedures and policies published on the intranet.
- Actively participate in proposed training sessions.
- If you become aware of any breach of law which could result in the risk of Pettenon becoming involved, or if you have any questions or need further information, please involve the Legal & Compliance Dept.
- Avoid conduct that, although not in clear breach of a regulatory provision, could damage the Company's reputation.
- Refrain from doing business with any person (physical or legal) known or suspected to be engaged in unlawful activities.

Let's take an example

Fabio, who works in the Purchasing department, has learned that the potential raw materials supplier, Carlo, has been in the papers for alleged corruption that has not yet been confirmed. The trial to establish whether or not Carlo is guilty is still ongoing.

How should Fabio behave?

Always avoid dealings with individuals who are suspected of offences or who could damage our company's reputation, even if only indirectly.



02

Professionalism Reliability and Fairness

We create value in what we do, for the benefit of all our stakeholders, by operating in accordance with the highest ethical standards of professionalism, reliability and fairness, over and above simple compliance with applicable regulations, labour contracts, or the pursuit of business objectives.

How we apply
the Ethical
Principle at
Pettenon

In the individual behaviour of employees:

Each person is called upon to carry out the activities for which they are responsible with professionalism and a level of commitment appropriate to the responsibilities entrusted to them, while respecting their commitments and acting honestly towards colleagues.

It is important to be familiar with and apply not only applicable laws but also company rules, such as procedures, policies and operating instructions.

The Company's directors, management and senior executives must carry out their respective roles with fairness and a sense of responsibility, undertaking to carry out their activities with diligence, while protecting our Company's reputation.

In relations with stakeholders:

Pettenon requires that relations with business partners be founded on loyalty and conducted in good faith and in a spirit of mutual respect and collaboration, in compliance with the contractual

commitments undertaken and the services requested. Moreover, accurate, comprehensive and truthful information should be provided on the products and services offered.

Suggestions

- Be clear and concise in verbal and written communications, while maintaining a professional tone.
- Treat all colleagues, customers and suppliers with respect, courtesy and professionalism, regardless of their role.
- Take responsibility for your actions, carry out your tasks promptly and offer support to colleagues when needed.
- Keep up to date with industry news and continuously improve your skills by actively participating in the training courses offered and organised by Pettenon.

Let's take an example

Your colleague Simone, from Pettenon's Sales department, has an appointment with an important foreign customer in the morning. Since he is going to the gym after work, Simone shows up at the appointment with the customer already dressed in his tracksuit.

Is Simone's behaviour professional?

No: when meeting the customer, Simone is representing Pettenon and therefore must project a professional and customer-friendly image.



03

Transparency

We are committed to the principle of transparency when pursuing and reporting our social and business objectives, making our information as accurate as possible.

With regard to the use of IT tools integrated with artificial intelligence systems, we ensure transparent and clear usage for all stakeholders, illustrating the purposes for which we use artificial intelligence technologies.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

We are required to provide complete, correct, adequate and transparent information so that our counterparts can make informed decisions.

Pettenon requires you to promptly report to your superior or to the Whistle-blowing Committee any omissions, inaccuracies or falsifications of financial and sustainability documents that come to your attention.

In relations with stakeholders:

In managing and carrying out its activities, Pettenon undertakes to disclose transparent, truthful, comprehensive and accurate information, preventing the spread of false or misleading news. All financial or sustainability-related

transactions are carried out by competent and authorised individuals and are promptly recorded in the relevant documents in full, ensuring traceability.

Suggestions

- Comply with current laws, standards and regulations on accounting, financial and sustainability reporting.
- Ensure that the Company's transactions are based on valid and legitimate documents (e.g. contracts, orders, invoices, and general terms and conditions).
- Keep accurate and complete accounts and do not falsify, omit, misstate, alter or conceal any information.



04

Value of the person and human resources

For Pettenon, human resources are an indispensable and valuable asset for the development, growth and improvement of our Company. Therefore, Pettenon invests in the training of its people and ensures a healthy, safe, comfortable and inclusive working environment that values and enhances the professional skills of each individual within the corporate community.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

Each individual must contribute to maintaining a climate conducive to the personal and professional growth of everyone within our corporate community.

It is essential to foster a working environment characterised by dialogue and mutual discussion, including through participation in discussions and the exchange of information that is instrumental to accomplishing corporate objectives.

In relations with stakeholders:

Pettenon is committed to:

- respecting the dignity and professionalism of its employees, supporting their training and professional development, including by providing them with information and training tools that use the most appropriate techniques;
- fostering talent and supporting growth on a meritocratic basis;
- promoting the protection of individual freedom and personality as an essential right;
- encouraging the protection and enhancement of human resources also by its business partners, through specific

contractual commitments and awareness-raising activities;

- in personnel selection and management:
 - adopting criteria based on equal opportunities, merit and developing the skills, competencies and potential of individuals, while avoiding any form of abuse;
 - ensuring that candidates fully correspond to the professional profiles required by the Company, in order to avoid favouritism;
 - if both general and individual annual objectives are set, ensuring they are focused on a possible, specific, practical, measurable result, and related to the time frame set to achieve them.

Suggestions

- Consider how your words and actions impact others.
- Use the Whistleblowing Channel to report incidents of harassment, abuse, disrespect in the workplace, as well as violations of the law, the Code of Ethics or other company provisions that may involve the Company in any way.
- Department heads must supervise the work of their employees.

Let's take an example

Michela, the procurement manager, has to deliver an important project by Monday for development of the Company's supplier area, to assess possible procurement savings. She asks her colleague Mattia for help. The next day, Michela manages to present the project to the CEO, but fails to mention Mattia's active contribution.

Does Michela's behaviour comply with the principle in question?

No: valuing human resources for us at Pettenon means recognising the contribution of each individual in different activities, acknowledging their merits.



05

Inclusion and gender equality

Through inclusion, we maintain a work environment where each unique individual is respected and valued within the organisation. In order to achieve this, we need people, each with their own characteristics, abilities and skills and regardless of gender, ensuring that everyone is offered equal opportunities.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

We are all required to respect each of our colleagues and collaborators as they express their particular identity and diversities, striving to nurture talent and helping to maintain a peaceful and stimulating work environment.

Each individual must ensure that the language, communication style and work organisation practices they employ and promote are respectful and inclusive of all people.

In relations with stakeholders:

Pettenon undertakes, including through the adoption of specific policies, to ensure that no harassment or discriminatory behaviour occurs in the workplace and in the performance of any company

activities, whether based on age, gender, sexual orientation, ethnicity, language, nationality, political and trade union opinions, religious beliefs, marital and family status, disability, genetic information or other non-job-related personal characteristics.

Suggestions

- Contribute to maintaining a positive and inclusive working environment.
- Report any harassment or discriminatory behaviour you witness – whether based on age, gender, sexual orientation, ethnicity, language, nationality, political and trade union opinions, religious beliefs, marital and family status, disability, genetic information or other non-job-related personal characteristics – when hiring, remunerating, promoting or dismissing an employee, as well as any form of favouritism.
- Take care to use inclusive, non-discriminatory language and behaviour that recognises and respects different identities, avoiding offensive terms and stereotypes.
- Embrace different cultural perspectives and experiences, seeing them as a source of enrichment rather than as an obstacle.
- Give feedback to your colleagues in a respectful and constructive manner, avoiding destructive criticism.

Let's take an example

During a company meeting, Massimo congratulates his colleague on her achievement, adding that it was certainly deserved “for a beautiful young girl” like her.

Is Massimo's compliment appropriate?

No: his colleague achieved her goal through her professional commitment and dedication to her work, which has been recognised by the Company, with her gender and age being totally irrelevant.



06

Protection of the environment

We pay the utmost attention to safeguarding the environment in which we operate for the benefit of the community and future generations, balancing optimal business performance with its environmental impact. We are aware of how significant the impact of our activities can be for the local area, and we therefore constantly encourage the development and use of operating practices that mitigate the environmental impact of our Company.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

Each individual must protect the environment by complying with the instructions given for energy saving, waste management and recyclable materials, as well as by participating in any Company initiative to protect the environment.

Furthermore, those who carry out their activities in areas subject to specific environmental regulations are required to know and apply the latter, as well as to comply with the requirements and instructions provided by the Company and necessary for protecting the environment.

We are all required to promptly report to the Company any shortcomings or non-compliance with applicable regulations in relation to environmental protection.

In relations with stakeholders:

Pettenon conducts its activities and makes its investments in a socially responsible manner from an environmental perspective, including by ensuring

complete and exhaustive communication with the community in which it operates.

Furthermore, the Company adopts procedures, policies and operating instructions aimed at prioritising business partners that make sustainable and environmentally friendly choices.

Suggestions

- Report any dangerous situations or situations that involve risks to the environment to your manager and via the Whistleblowing Channel, in order to minimise possible incidents and identify appropriate corrective actions.
- When considering a new project or product, also take into account its environmental impact throughout its supply chain.
- Promote the use of sustainable services and materials in the day-to-day activities of the Company.
- Ensure that all claims concerning the sustainability of products or services are supported by concrete and verifiable data. Use recognised and trusted certifications to prove the sustainability of products.
- In your day-to-day work, make an effort to choose the most sustainable solutions in terms of environmental impact wherever possible.

Let's take an example

Maria, who works in Pettenon's production department, sees her colleague Gabriella emptying a container down the drain every evening. However, according to company procedure, this container should be emptied in a designated company area.

What should Maria do?

She should inform Gabriella of the correct procedure to follow when emptying that particular container and, if Gabriella continues to behave in this way, she should promptly notify her department supervisor.

The company has equipped each building with water dispensers to reduce the use of plastic bottles and encourage employees to use reusable containers.



07

Supporting the community

We recognise the important role the community has played in Pettenon's growth. That is why we want to support the community in return, through numerous projects run by non-profit organisations and associations at national and local level through sponsorships, donations and collaborations, thus establishing a virtuous circle.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

Everyone is called upon to actively participate in the various social initiatives that Pettenon supports.

In relations with stakeholders:

The Company supports initiatives promoted by reputable organisations and for worthy purposes (for example, social, moral, scientific, cultural, charitable or solidarity purposes).

No direct or indirect contributions are permitted to parties, trade unions, cultural or charitable organisations or po-

litical representatives/candidates or to events with political aims, where made with a view to obtaining material, commercial or personal advantages.

Pettenon condemns any relationship with national or foreign organisations, associations or movements that directly or indirectly pursue aims that are prohibited by law, contrary to ethics or public order, or that violate the fundamental rights of the individual.

Suggestions

- Do not make contributions/donations (whether financial or material) to organisations whose values conflict with those of Pettenon.
- When making donations or sponsorships, make sure you always follow the internal approval flows provided by the Company.
- Ensure that donations and sponsorship activities carried out in the name of the Company always comply with the Principles of this Code of Ethics.

Let's take an example

A non-profit association asks Pettenon to receive some products and to use its company logo for an event next Sunday. Given the very short time available, the company proceeds as requested without any proper prior checks on either the specific initiative or the applicant association.

Was it correct to proceed as described?

No: if we fail to perform proper prior checks on both the organisations we wish to support and the specific initiatives, we risk supporting entities and initiatives that are inspired by values that differ from or even run counter to those pursued by our Company.



08

Protection of health and safety at work

We promote and ensure health and safety in the workplace for both employees and all those who access the Company's offices and facilities, establishing company procedures and instructions aimed at maintaining high standards of health and safety within our work organisation.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

Everyone must carry out their work activities with the utmost care, complying with current company regulations and procedures on health and safety in the workplace and behaving responsibly to protect their own health and safety and that of others.

Everyone is required to contribute to the dissemination of company procedures and good practices on health and safety in the workplace, and to promptly report any violations thereof.

In relations with stakeholders:

Pettenon promotes responsible and safe behaviour and adopts all the safety measures required by technological developments to ensure a safe and healthy working environment, in full compliance with current prevention and protection regulations.

The Company is committed to spreading and strengthening a culture of safety in terms of prevention, raising awareness of risks and promoting responsible behaviour by all individuals, who are provided with adequate information and training to ensure full and timely compliance with the Company's internal rules and procedures.

Suggestions

- Complete all assigned safety training courses in good time so that you can understand and comply with all safety rules and procedures established for your work.
- When making decisions dictated by your role and duties, make sure:
 - you give appropriate instructions to your colleagues;
 - you properly assess risks that cannot be avoided, in order to mitigate their potential effects as much as possible;
 - where possible, you replace what is dangerous with what is not dangerous or is less dangerous;
 - that people use all the personal protective equipment required and made available by the Company for that specific activity;
 - you adapt to technical progress;
 - you prioritise collective protective measures over individual protective measures.

Let's take an example

Anna has recently been hired in the mixing department at Pettenon, where it is necessary to follow specific rules involving the use of certain personal protective equipment (PPE). This PPE includes safety goggles, but Anna does not appear to use them because she considers them to be uncomfortable. Anna's colleague Laura doesn't say anything to her and doesn't warn the department supervisor.

Is Anna and Laura's behaviour correct?

No! Safety goggles, like other PPE provided by the Company, are a vital item of equipment for protecting the health of our colleagues, especially when employed in our Company's production areas. Not using safety goggles puts Anna's health at risk, despite the fact that the Company has provided her with protective equipment. Moreover, Laura is required to report this non-compliance to her department supervisor so that they can intervene.



09

Safeguarding know-how and industrial and intellectual property

We recognise that the wealth of strategic information and intellectual and industrial property of every company (trademarks, patents, distinctive signs, designs, industrial models, intellectual works, etc.) is a fundamental asset for its business and competitiveness on the market. We therefore undertake to respect and protect our own and others' assets.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

Each individual is obliged to ensure the utmost confidentiality with regard to strategic information relating to Pettenon and its business partners should they become aware of it while carrying out their work duties. Refrain from misappropriating industrial property rights, industrial designs or models and/or from altering or counterfeiting trademarks or other distinctive signs of products. This obligation continues to apply even outside working hours, in order to safeguard both our know-how and corporate reputation.

In relations with stakeholders:

Pettenon adopts procedures, policies and operating instructions aimed at ensuring that the utmost care is taken not to violate intellectual property rights of third parties such as our customers and suppliers, and performs all necessary checks with the Legal & Compliance

Dept.

Pettenon prohibits conduct generally aimed at the unlawful duplication, reproduction or misappropriation, in any form and without right, of the work and/or know-how of others. For the use of music, images or software, the relevant licences must always be obtained from the rights holders of these works.

Suggestions

- In general, consider as confidential all information that is not in the public domain, relating to the Company or to its business or affairs, should you become aware of it at work or for work reasons.
- Comply with the regulations and operating instructions that Pettenon adopts to protect its assets.
- Where there is a need to share certain strategic information with business partners, consult with Pettenon's Legal & Compliance Dept. to protect such information through appropriate measures, such as signing a confidentiality agreement (so-called NDA) with the business partner.
- What do we mean by confidential company information? Confidential information includes the names and data of customers, the names and data of suppliers, the characteristics, formulas, composition and active ingredients of Pettenon's products, any web-related data and strategies, and Pettenon's patents;
- When disclosing information to third parties, which is permitted for professional reasons, the confidential nature of the information must be expressly declared using appropriate disclaimers such as "CONFIDENTIAL" and "©2024 Pettenon Cosmetics SpA SB – all rights reserved";
- Such strategic information is also protected through the use of computer tools protected by passwords and other security measures. Therefore, please take great care not to lose or divulge your access credentials for company computer tools.



10

Prevention of corruption

We do not tolerate any benefits or gifts being offered or received for the purpose of influencing a person's behaviour in order to obtain a commercial or other advantage.

We adopt measures and strategies aimed at avoiding corruption.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

Company employees may accept or offer gifts as long as they are directly related to the activity carried out, lawful, modest in value, appropriate to the circumstances, offered in a transparent and explicit manner, occasional or handed out at customary gift exchange events, and do not create any obligation on either side, in compliance with current company policies.

Those who represent Pettenon or act in Pettenon's interest, or have a business relationship with it, must refrain from any form of corruption with reference to both public and private parties, undertaking to interact with them in an honest, ethical and respectful manner.

In relations with stakeholders:

Pettenon does not allow any form of payment or granting of advantages to or by suppliers, customers, business partners, etc. where not strictly arising from a negotiated obligation or business

relationship governed by a contract. Every operation and transaction carried out on behalf of Pettenon shall be subject to checks for legality and appropriateness and shall therefore be correctly recorded and authorised.

Suggestions

- Keep track of any dealings with the public administration (e.g. with officials of the Agenzia delle Entrate (Italian Revenue Agency), SPISAL (Workplace Health and Safety Service) and/or other similar bodies).
- Make and receive payments only through traceable banking systems.
- Ensure that the data in the Company's books and records is truthful and complete.
- Follow the information flows and procedures adopted by the Company.
- Do not offer or accept any kind of improper payment.
- Do not incur entertainment expenses that could give rise to suspicions of impropriety or create the impression of trying to influence the actions of public officials or politically exposed persons.
- When doing business on behalf of Pettenon, it may happen that gifts are exchanged to establish or maintain good business relations. However, do not accept favours or gifts from business partners who believe that, by offering them, they are influencing us to make decisions in their favour; such situations could give rise to forms of corruption and damage our Company's honest and professional image.

Let's take an example

Mario, the Company's buyer, receives a Christmas parcel from the supplier Luca. Inside is a bottle of fine wine and a luxury watch. Luca hopes that this gift will influence Mario to renew the expiring contract.

How should Mario behave?

Always avoid accepting expensive gifts from suppliers to maintain integrity and transparency in professional relations, avoiding situations that could be interpreted as corruption or a conflict of interest.



11

Prevention of conflict of interest

A conflict of interest occurs when a personal interest, activity or relationship interferes or appears to interfere with Pettenon's interests. While we are aware that conflicts of interest may occur, we are committed to avoiding them or, where they do occur, identifying them and making decisions based on Pettenon's best interests.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

Each individual shall always act impartially, professionally and in the exclusive interest of Pettenon, avoiding situations in which a conflict of interest may arise. In private relationships, any abuse of your working position intended to obtain undue advantages for yourself or others must be avoided. Furthermore, we are obliged to refrain from taking personal advantage of business opportunities that come to our attention in the course of our work duties. In carrying out business duties, everyone must comply with the policies, procedures and operating instructions adopted by Pettenon in order to prevent and minimise the risk of a conflict of interest materialising.

In relations with stakeholders:

Pettenon adopts policies, procedures and operating instructions to prevent and minimise the risk of a conflict of interest materialising.

Pettenon requires that any situations that may even appear to be in conflict of interest must be avoided or at least reported to your supervisor (where applicable) and, in the most serious cases, reported to the Whistleblowing Committee.

Suggestions

- If your partner, family member or close relative works for a Pettenon customer, competitor or supplier, disclose this to your supervisor and, if the conflict of interest cannot otherwise be avoided, to the Whistleblowing Committee.
- Refrain from favouritism: when assigning tasks or services, ensure that you have identified the supplier in compliance with the procedures in place and in accordance with the principles of transparency, objectivity and fairness, without your personal, emotional or economic interests influencing your independence of judgement in pursuing our Company's best interests.
- Do not misuse company equipment, time, resources or information for another job or for activities other than those you carry out for Pettenon.

Let's take an example

Imagine that our company is looking for an agency to organise its next corporate event and you are tasked with selecting the best supplier. As luck would have it, Luca, your partner's brother, happens to own an events agency. If you decide to award the contract to Luca's agency without considering other options or without declaring your family connection, you may find yourself in a conflict of interest situation, as your judgement may be influenced by a desire to benefit Luca, rather than making the best choice for the Company in terms of quality and price.

What should you do in a case like this?

Point out the potential conflict of interest and justify the objective reasons why Luca's agency is indeed the best in terms of quality, services and commercial conditions. Also conduct any tenders between suppliers – where required by the procedures in force – ensuring that the bids received remain confidential and avoiding placing Luca at an advantage with respect to other potential suppliers.



12

Protection of competition

We are committed to healthy and fair competition to ensure the smooth running of markets, protect each operator's freedom of enterprise and also protect customers.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

In carrying out their activities and in relations with competitors, customers, suppliers and other stakeholders, each employee is obliged to fully respect the principle of protection of competition and to act in accordance with the antitrust rules.

Therefore, each individual is required to refrain from using unlawful means to acquire trade secrets or other confidential information from competitors, and from implementing and/or encouraging unfair forms of competition.

In relations with stakeholders:

As part of its commitment to act in the market in compliance with competition law, Pettenon adopts policies, procedures, operating instructions and internal training sessions to ensure that its

industrial or commercial activities are conducted properly. Pettenon prohibits any improper action against business partners (e.g. sabotage, falsification of technical, commercial and accounting documents and, in general, any fraudulent schemes).

Suggestions

- Promote products truthfully, avoiding false or exaggerated claims, in line with the provisions of the Pettenon handbook on "fair, truthful and transparent commercial communication".
- Participate in training courses organised by the Company for a better understanding of your responsibilities, the signs to watch out for and what conduct to avoid.
- Promote pricing policies that allow retailers to determine the selling prices of products themselves. Provide recommended – but not mandatory – sales prices in line and in keeping with brand positioning.

Let's take an example

Tiziana is a marketing colleague at Pettenon and has to develop a new product line. On the Internet, Tiziana has noticed that the well-known company Rossi has launched a new brand and is enjoying a fair amount of success. Tiziana therefore suggests using signs and colours for the new Pettenon product line that are very similar to those of the competitor's product, in order to save on development and research costs.

Are Tiziana's actions correct?

No: this choice constitutes a form of unfair competition, given the improper exploitation of a competitor's industrial/intellectual property rights.

Fabrizio is employed in Pettenon's Sales department and looks after a group of foreign customers, for which he considers it appropriate to impose minimum resale prices so that they do not charge such low prices that they jeopardise Pettenon's business strategy.

Is Fabrizio's conduct correct?

No: imposing minimum resale prices is behaviour that eliminates price competition, harming consumers who cannot benefit from lower prices resulting from business competition.



13

Prevention of money laundering

We condemn any conduct that involves using, replacing, transferring, or otherwise concealing sums of money known or suspected to be of illicit origin.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

Each individual is required to exercise caution in commercial transactions to avoid the danger of placing securities of dubious origin on the market.

Therefore, we are called upon not to build or establish on the Company's behalf any business relationships with business partners who are suspected or known to be involved in any illegal activities.

Before establishing business relationships with them, the information available on our business partners must be checked in advance, in order to confirm their ethical integrity and ensure that they meet the necessary technical and professional requirements for the activities.

In relations with stakeholders:

The Company requires the utmost transparency in business transactions and relations with third parties, in full compliance with national and international regulations on combating money laundering. All financial transactions, including those within the group, are adequately justified in the contractu-

al relationships and are carried out using payment methods that guarantee traceability. Here the aim is to protect Pettenon's products and services from being used for the purposes of money laundering and financing terrorism.

Pettenon adopts procedures, policies and operating instructions aimed at preventing the laundering of money from illegal activities.

Suggestions

- Comply with the information-approval flows laid down in the procedures adopted by the Company.
- Pay attention to alarm bells such as any mismatch between the person making the payment and the person receiving/performing the service.
- Strictly comply with the laws, ensuring full traceability of incoming and outgoing financial flows, in accordance with anti-money laundering laws.
- Carry out preventive checks on the reliability, stability and integrity of the supplier or customer by contacting colleagues in the Administration, Finance and Control department.

Let's take an example

A Turkish customer of Pettenon wants to place a large order for products but asks to have the goods invoiced to his brother's company based in Cyprus.

Can this customer request be fulfilled?

A case-by-case evaluation is required. The case in question could conceal money laundering operations, exposing Pettenon to reputational and criminal risks.



14

Freedom of association

In accordance with our Values and ethical principles, we recognise the freedom of association of employees and collaborators as an opportunity for the corporate community to grow as a whole.

How we apply the Ethical Principle at Pettenon

In the individual behaviour of employees:

When dealing with each other, each employee undertakes to guarantee the freedom of association of their colleagues, in a climate of mutual respect without any form of discrimination.

In relations with stakeholders:

Pettenon respects the freedom of association of its workers. Therefore, the Company guarantees freedom of association by neither hindering workers from participating in such initiatives nor discriminating them for doing so.

Suggestions

- Facilitate information about the freedom of association of colleagues.
- Report any discriminatory behaviour against employees who join any association.

Let's take an example

Mauro has discovered that some of his colleagues meet every Friday afternoon at 4 pm in a meeting room provided by the Company to discuss topical issues. Loredana, Mauro's supervisor, considers this kind of initiative a waste of time and schedules a meeting between 3.30 pm and 5.00 pm for Mauro.

Is Loredana's behaviour correct?

No: the ethical principle in question requires all of us to respect the freedom of association of our colleagues, regardless of whether we personally share the values pursued by each, and to undertake not to hinder participation in such groups.



Implementation and control

This Code of Ethics, which is an integral part of the Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001, is adopted by Pettenon by resolution of the Board of Directors. Any amendments or updates thereof shall be made in the same form and shall also be communicated to the Recipients by publishing it on the Compa-

ny's website at <https://www.pettenon.it/en/code-ethics-and-model-organization> and on its corporate intranet. Pettenon is committed to fostering and ensuring adequate circulation and awareness of the Code of Ethics, guaranteeing continuous awareness of its Values and Ethical Principles also through the activities of its Ethics & Compliance Committee.



Ethics & Compliance Committee

To guarantee and protect our Company's commitment to complying with the principles and Values of its Code of Ethics and with the provisions of current regulations, the Pettenon Board of Directors has set up the Ethics & Compliance Committee as a body with advisory, verification and proposal-making functions so that the Company operates and develops within the ethical criteria, respecting the principles and rules of conduct expressed in the Code of Ethics.

The Ethics & Compliance Committee works with the Whistleblowing Committee (see next section) and the Supervisory Board in overseeing the correct application and adequacy of, and compliance with, the Code of Ethics. In particular, the Ethics & Compliance Committee is informed by the Whistleblowing Committee in the event of violations or alleged violations of the Code of Ethics and provides a reasoned opinion on remedies in the light of the violations detected.

Supervisory Board

With the approval of the Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/01, of which the Code of Ethics is an integral and substantial part, the Pettenon Supervisory Board was established; this body is entrusted with the task of supervising the functioning of the Model and ensuring it is updated.

Compliance with the Code of Ethics is also monitored by the Supervisory Board established pursuant to Italian Legislative Decree no. 231/2001. In order to ensure the confidentiality of reports, Pettenon has set up an IT Whistleblowing Channel and a Whistleblowing Committee responsible for receiving reports and involving the Company's relevant bodies as appropriate.



Implementation and control

How to be heard: the Whistleblowing Channel and the Whistleblowing Committee

In carrying out our functions and activities for the Company, we are all responsible for complying with the Code of Ethics and detecting and reporting any violations thereof.

To this end, Pettenon has adopted its own internal reporting channel accessible from the website <https://www.pettenon.it/en/whistleblowing> and has appointed an internal reporting committee (known as the Whistleblowing Committee). Events and conduct constituting violations of the Code of Ethics should be reported through this channel.

The Whistleblowing Committee shall, depending on the nature of the reported conduct, involve the Ethics & Compliance Committee and, where appropriate, the Company's Supervisory Board.

The procedure for managing internal reports, namely the formalities and procedures for collecting, managing and filing them, as well as the information flows between the Whistleblowing Committee and the other corporate bodies/departments that may be involved in managing them, are governed by the **Whistleblowing Procedure** available at the above-mentioned web page, the contents of which are deemed to be fully referred to herein.

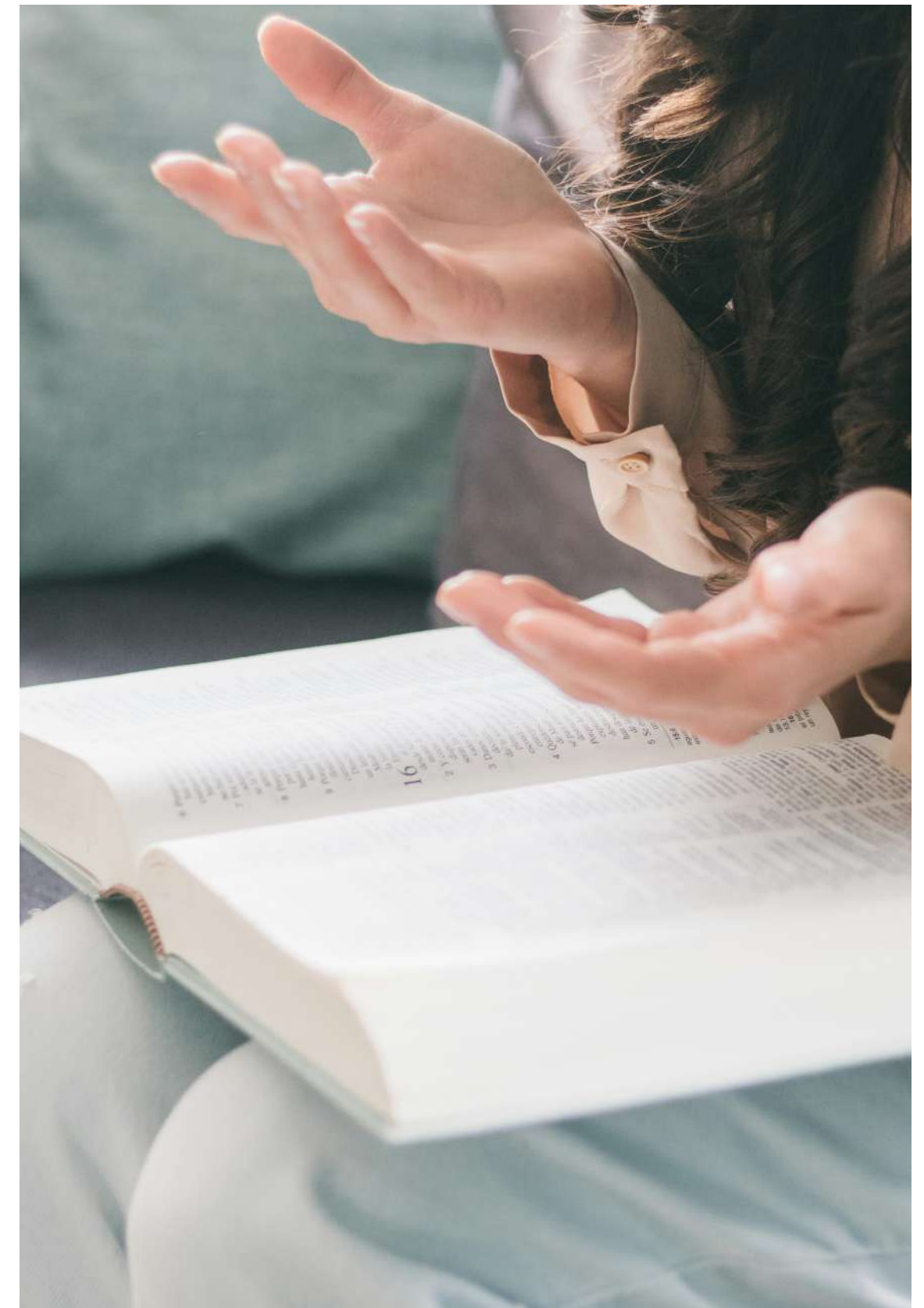
Suggestions

If you notice behaviour that concerns you because it could constitute a violation of the provisions of this Code of Ethics, ask yourself whether what you have observed:

- is aligned with the Code of Ethics;
- is itself ethical conduct;
- is legal.

Also ask yourself if you are sure it will not have a negative effect on Pettenon's image or reputation.

If the answer to one or more of these questions is negative, then you can make a report through the Whistleblowing Channel.



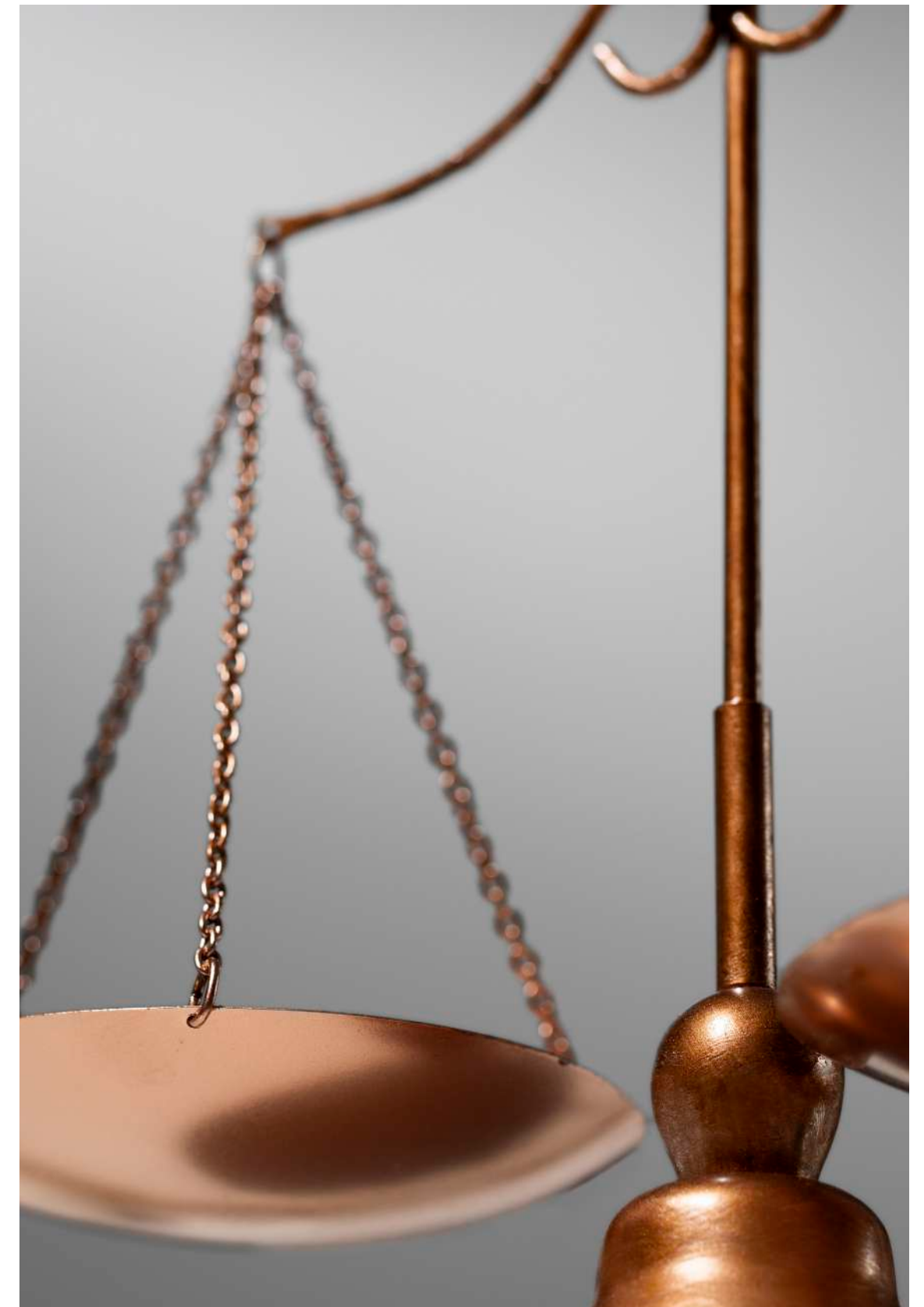
Penalties

The Code of Ethics, together with all the specific procedures, policies and operating instructions approved and adopted by the Company, is considered an integral part of the employment contracts between the Company and its employees, pursuant to Article 2104 of the Italian Civil Code (employee's duty of diligence).

Violating its provisions shall therefore constitute a disciplinary offence and, as such, shall be prosecuted and punished by the Company in accordance with Italian Law No. 300/1970 (Workers' Statute - Regulations on the protection of workers' freedom and dignity, trade union freedom and trade union activity in the workplace, and employment regulations) and may result in compensation for damages caused to the Company.

The Company's Board of Directors is periodically informed of such violations of the Code of Ethics.

As far as the Company's collaborators, consultants, customers and suppliers are concerned, adherence to the provisions and principles laid down herein is an essential condition for contracts of any kind to be stipulated between the Company and such parties. The provisions thus subscribed to or in any case approved, even by conclusive facts, form an integral part of the contracts themselves. In view of this, any violations of the specific provisions of the Code of Ethics by Pettenon's business partners may, depending on their seriousness, entitle the Company to terminate the contractual relationship in place between our Company and them pursuant to Article 1456 of the Italian Civil Code (Express termination clause).





Code of Ethics in other companies of the Pettenon Group

This Code of Ethics applies to all Italian and foreign companies of the Pettenon Group which are directly or indirectly controlled by the same.

However, in some countries it may be mandatory to regulate additional aspects not covered by this Code of Ethics in a separate code of ethics. In such cases, the codes of ethics adopted at the local level shall apply on a residual basis.

Where a channel for reporting ethical violations has not been set up locally, the Pettenon reporting channel is available at <https://www.pettenon.it/en/whistle-blowing>.

In some countries, failure to report violations of the Code of Ethics or unlawful conduct may also result in sanctions.



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Padua Company Register No., Tax Code and VAT No.: 04937500280
Share Capital of 7,500,000.00 euros, fully paid-up