

# SUPPLIERS CODE OF CONDUCT



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Dear Supplier,

We are pleased to present you with our Supplier Code of Conduct, a document that expresses the values of trust and collaboration on which Pettenon Cosmetics builds its relationship with its suppliers.

For over 75 years, we have distinguished ourselves in the cosmetics industry with an identity rooted in the tradition of Italian know-how and a dynamic and innovative spirit. Through a wide range of beauty-care products and services, we respond to the beauty desires of consumers, professionals and partners, offering affordable, tailor-made and professional-quality solutions. Our vision of beauty is authentic, sustainable and attentive to market developments, guided by principles of ethics, transparency, respect and integrity.

These values inspire our commitment to creating a positive impact, strengthening our ties with the local area and promoting the well-being of the people and communities that we operate in. Our transformation into a Benefit Corporation in 2021 has further consolidated this commitment, integrating it into our company statute: to generate value through ethical business, where respect for human rights, decent working conditions and environmental protection are indispensable elements.

Our reputation is based on the constant application of these principles in all our daily activities. That is why we strive every day to create and enhance beauty in all its forms, with a dedication that goes beyond aesthetics to touch the heart of ethics. Beauty that goes beyond: done well and that does good, aimed at creating a positive and lasting impact.

Therefore, we ask our suppliers, both of goods and services, and the entire supply chain not only to adhere to and conform to these values, but also to actively promote them within their own networks, so that our positive impact spreads at all levels and generates shared value.

We therefore expect all our partners to respect the principles outlined in our Supplier Code of Conduct, which is inspired by the highest international standards, including the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Universal Declaration of Human Rights and the UN Global Compact.

Only by working together through collaboration based on ethics, fairness, respect for labour standards, health and safety, transparency, social and environmental responsibility can we continue to innovate and grow ethically and sustainably.

We urge you to read this document, share it with your employees and your respective suppliers, and ensure its full implementation.

*Pettenon Cosmetics S.p.A. S.B.*



## Fundamental Principles

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Labour and Human Rights

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Health and Safety

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Environment

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Management System

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Product Quality and Safety

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Ethics

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Violations of the Code - Handling of Reports

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## Code of Conduct for Suppliers

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This Code of Conduct for suppliers of Pettenon Cosmetics S.p.A. S.B. (hereinafter also the “**Company**” or “**Pettenon**”) is a direct expression of the fundamental values described in the Code of Ethics of our Company, approved by the Board of Directors of Pettenon Cosmetics S.p.A. S.B. and to which the compliance of all Suppliers (as defined below ) is required. This is because the ethical principles we believe in can only be fully respected if they are shared with all our partners and pursued in all our daily activities.

Therefore, what is required in this Code of Conduct does not replace but is in addition to what is required by the Code of Ethics, laws and contractual commitments undertaken by the Supplier with Pettenon.

The Code of Ethics is available on the website <https://www.pettenon.it/it/modello-organisation-and-code-of-ethics> together with the Organisation, Management and Control Model pursuant to Legislative Decree 231/01 on the administrative liability of bodies.

## Scope of Application

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This Code of Conduct applies to all Suppliers, i.e. all business partners producing, trading, selling, hiring and/or supplying goods or services forming part of the Company’s supply chain, where such sellers and traders have a direct business relationship with Pettenon Cosmetics S.p.A. SB (hereinafter referred to in the singular ‘Supplier’ and plural ‘Suppliers’).

This Code of Conduct defines, in addition to the Company’s Code of Ethics, the rules of engagement of Suppliers in relation to the principles set out therein. Suppliers’ compliance with these principles will be reasonably proportionate to the size and risks associated with the activities of each specific supplier.

Finally, Suppliers are also required to apply the same standards of conduct as set out in this Code of Conduct in their supply relationships.



## FUNDAMENTAL PRINCIPLES

# Labour and Human Rights



- **Respect for human rights.**

Suppliers must respect human rights in all their operations, ensuring decent working conditions, respect for occupational safety and health and taking measures to prevent any form of discrimination, exploitation or abuse.

- **Inclusion of women and gender equality, promoting work-life balance.**

Suppliers must commit to promoting the inclusion of women and gender equality in all activities, ensuring equal access to employment, fair treatment and a policy of non-discrimination.

- **'No' to forced or child labour.**

No supplier may employ any form of child labour. The term 'minor' refers to a person who is under the age of 15 or who has not yet reached the age of completion of compulsory schooling, even if that age is older than 15.

- **Right to freedom of trade union association.**

All suppliers must allow their employees to be represented by trade unions or other elected representatives in accordance with the law, avoiding any form of interference, discrimination, retaliation or intimidation.

- Respectful and dignified treatment.
- Compliance with minimum wage and overtime regulations.



## Health and Safety

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- **Safe and healthy work environment.**

Health and safety at work are fundamental workers' rights. All Suppliers must ensure and maintain a safe work environment in compliance with applicable laws.

- **Accident prevention and occupational disease management.**

All Suppliers must be committed to preventing occupational injuries and illnesses by taking effective measures to identify, assess and mitigate risks, ensuring a safe and healthy working environment in accordance with local regulations and international standards.

- **Measures for industrial hygiene and safety in the workplace.**

Suppliers must take industrial hygiene measures to prevent exposure to hazardous substances and to improve safety.

## Environment

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Suppliers must comply with all applicable environmental laws and must provide training to all relevant personnel on environmental protection policies and procedures. Suppliers must implement processes and systems to reduce the use of natural resources, such as water and energy, and minimise waste production. The Group that Pettenon belongs to also recommends the implementation of an environmental management system to manage, track and set targets for environmental performance, including waste, water and energy management.



# Management System

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- **Adoption of a management system compliant with the Code of Conduct, also extended to the selection of its suppliers.**

Suppliers undertake to adopt a Management System that is aligned as much as possible with this Code of Conduct. It is important that this system is also extended to the selection and management of its suppliers, ensuring that they too adhere to the same standards of quality, ethics and sustainability. Before collaborating with other companies, the company wishes to assess their environmental and social impact through appropriate methods and measurements. The supplier undertakes to implement good practices and ad hoc procedures to ensure the conformity of its flows and to regularly monitor its own performance and, possibly, that of its suppliers. It is essential that the supplier plans and carries out periodic internal audits and takes effective and immediate corrective measures in the event of non-compliance. The Company reserves the right to carry out any audits and inspections to verify compliance with this Code of Conduct.

- **Training and communication with workers**

Suppliers are committed to investing in the continuous training of their workers, implementing ad hoc programmes to educate workers on best practices, quality standards and safety procedures. It is important that training also covers topics such as environmental sustainability, business ethics and social responsibility.



## Product Quality and Safety



- **Commitment to provide all necessary documentation to ensure complete product traceability.**

Suppliers undertake to share all documentation, related to the supplied products, to support the verification of compliance with traceability and safety requirements.

- **Implementation of strict processes to minimise contamination risks from processing and the environment.**

Suppliers undertake to have formal processes and mechanisms in place to minimise the risk of contamination of products during their processing and storage, and to ensure that the company's indoor environments for product processing comply with health and hygiene regulations.

## Ethics



All partnership activities with the Company require compliance with the highest standards of integrity, honesty, ethics and fairness, in accordance with the ethical principles enshrined in Pettenon's Code of Ethics, some of which we have deemed worthy of note below with reference to the Company's relationship with its Suppliers.

- **Prohibition of corruption and extortion.**

Pettenon does not tolerate the offer or receipt of any benefit or gift for the purpose of influencing a person's behaviour in order to obtain a commercial or other advantage. Therefore, the Company's Suppliers are required not to give, offer or promise payments, direct or indirect, monetary or in any other form, in order to obtain or maintain a relationship with the Company, or for any other benefit, thereby obtaining an improper advantage over other potential Suppliers.



- **Legal compliance with local, regional and international regulations.**

Our Company is committed to the strictest compliance with applicable national, EU and international laws in the performance of all its activities. Similarly, our suppliers are also obliged to operate in compliance with all applicable international EU and national laws and regulations and to ensure that this principle is also respected by sub-suppliers.

- **Principles of professionalism, reliability and fairness.**

The Company creates value in what it does, to the benefit of all its stakeholders, by operating in accordance with the highest ethical standards of professionalism, reliability and fairness, beyond mere compliance with applicable regulations or the pursuit of business objectives. Therefore, at Pettenon we base our choices on these principles and expect the same from our suppliers.

- **Protection of know-how and intellectual and industrial property.**

All business information regarding Pettenon is to be considered strictly confidential and reserved. Suppliers are therefore forbidden to disclose to third parties information concerning Pettenon or the products bearing the trademarks owned by Pettenon, or concerning the process of supplying products and services to Pettenon, unless expressly authorised in writing by Pettenon.

In addition, at Pettenon we recognise that the wealth of strategic information, intellectual and industrial property of each company (trademarks, patents, distinctive signs, designs, industrial models, intellectual works, etc.) is a fundamental value for business and market competitiveness. We therefore undertake to respect and protect that heritage of others. Suppliers are therefore obliged to respect the intellectual property rights of third parties.



# Violations of the Code Handling of Reports



Violations of this Supplier Code of Conduct are seriously considered by our Company and must be specifically reported via the dedicated e-mail address [CodiceCondottaFornitori@pettenon.it](mailto:CodiceCondottaFornitori@pettenon.it).

Any **breach of this Code of Conduct** by the Supplier may result in one of the following or similar actions:

- asking the supplier to audit its organisation or supply process and report on the results;
- recommending corrective actions;
- affecting the supplier's qualification and/or rating;
- terminating the existing contractual relationship with the Supplier.



Pettenon Cosmetics S.p.A. Benefit Corporation  
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Registration Number in the Padua Companies Register,  
Tax Code and VAT Number: 04937500280  
Share Capital: €7,500,000.00 fully paid-up