

EMSIBETH
COMPANY ■

Emsibeth Benefit Corporation

*Code of
Ethics*

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Foreword

Emsibeth S.p.A. (hereinafter also referred to as 'Emsibeth' or 'Company' for short), is rooted in the culture of well-being.

"We exist to generate beauty and well-being while respecting the uniqueness of each person. We want to help others in a concrete way and inspire them with our values."

Values that underpin the Company's Code of Ethics and are deeply shared in the definition of the Company's strategic objectives.

The company, which was founded as a manufacturer and marketer of cosmetic and professional hair care products, is characterised by passion and attention to the different needs of the customer and consumer, and bases its business on the enhancement of the individual.

The constant search for excellence and the desire to create a culture of well-being, combining competence and innovation, has led Emsibeth today to represent four brands that stand out for their professionalism and quality, integrating those values in which the company has always believed, and to promote high-level training for employees and collaborators.

The principles with which Emsibeth identifies come to life in the will to value each person, understood as a unique and authentic beauty, in full respect of the environment and society, through a strategic and operational model oriented towards the promotion of sustainability.

The continuation of this path led Emsibeth S.p.A. to become a Benefit Corporation in December 2021, formalising its present and future commitment to the creation of a positive impact for the common benefit.

1. THE CODE OF ETHICS OF EMSIBETH S.p.A.

The present document known as the 'Code of Ethics' is a document drawn up and adopted on a voluntary basis by Emsibeth that defines a set of ethical and social standards to which all addressees must adhere in compliance, moreover, with national and international regulations. nals in force.

The Code of Ethics is aimed, inter alia, at fostering and promoting a high standard of professionalism and avoiding behavioural practices that differ from the interests of the Company or deviate from the law, as well as contrasting with the principles that Emsibeth intends to promote. This document clearly and transparently defines the value horizon within which the Company assumes the responsibility to operate towards all stakeholders with whom, for any reason, even occasionally and/or temporarily, it relates and interacts in the context of its business activities.

The set of principles expressed here represents the 'beacon' that guides and inspires the actions of all addressees.

Emsibeth defines a set of rules, adopting a procurement policy aimed at promoting sustainable procurement, i.e. procurement that has the most positive social, environmental and economic impacts possible throughout the life cycle of products and services, and that aims to minimise negative impacts. This policy can be downloaded here: [Link to Responsible Supply Chain Policy](#)

Emsibeth's Responsible Supply Chain Policy aims to suggest guidelines and good practices that apply sustainable criteria at all stages involved in the purchasing process to generate a positive impact on the environment, society and the economy. The aforementioned policy also helps to improve communication with interested parties, by promoting mutually beneficial relations, reducing risks, optimising costs and disseminating innovative models throughout the supply chain. The Company incorporates environmental and social parameters into its supplier evaluation and selection procedure.

1.1 Addressees and scope

The Code of Ethics, and any future updates to it, is addressed to all those who participate in the operation of the Company, who have a moral and professional responsibility for the promotion and application of the values laid down therein, in the performance of their duties, including representing third parties.

In particular, this document is addressed to all employees and collaborators wherever they work, regardless of the legal status of their employment relationship with the Company; to directors, members of the board of auditors and procurators, i.e. all persons acting in the name and on behalf of the Company and/or under its control; including consultants, suppliers, distributors and business partners.

The Code of Ethics is without prejudice to the application of laws, labour agreements and internal procedures or regulations applicable to the addressees.

1.2 Supply chain

The Company bases its relations with suppliers and business partners on the application of the principles and values contained in the Code of Ethics.

It is committed to ensuring that negotiations and business relations are based on transparency, fairness, loyalty and recognition of the professionalism and competence of the interlocutor.

2. GENERAL PRINCIPLES

2.1 Legality

The respect for the law is a cardinal principle on which the Company's activities are based.

The addressees of the Code of Ethics are, therefore, obliged to conduct their activities in compliance with national and European regulations, with the Code itself, and with the generally recognised rules, principles and customs of international law.

Conduct that does not comply with the legal requirements, set out above, and is aimed at the pursuit of the interest or advantage of the Company is not, under any circumstances, justified.

The Company is committed to pursuing the values of transparency, impartiality and reliability, in order to avoid conflict of interest phenomena, i.e. to prevent situations in which personal interest undermines that of the Company, conflicting with the pursuit of the corporate mission.

2.2 Transparency

The principle of transparency is based on clarity, completeness and truthfulness of information, and aims to avoid situations of misrepresentation, both in internal and external communication with the Company.

Compliance with the principle of transparency is ensured through the publication and disclosure of information and data, both in written and verbal form, in an accurate, comparable and timely manner.

2.3 Anticorruption

The Company, in full compliance with the rules on the prevention of corruption, as well as to protect the principles of transparency, legality and professionalism, referred to in the Code of Ethics, combats corruption in all its forms, direct and indirect, pursuant to the provisions of Law 190/2012. Emsibeth repudiates the possibility that in specific organisational and/or management spheres there may be behaviour of abuse by a subject of the power entrusted to him/her in order to obtain private advantages, also favouring reporting systems.

2.4 Professionalism and Reliability

The Company considers the value of professionalism to be of fundamental importance in order to provide its employees, customers and other parties with whom it has business relations, with the highest qualitative level of performance. With this in mind, it promotes specific training courses for all workers, in order to increase knowledge, develop new skills and improve specific abilities.

2.5 Impartiality and rejection of all discrimination

The Company has as a core value the combating of all forms of discrimination based on gender, sexual orientation, ethnicity, language, age, religion, political opinions and personal and social conditions.

It therefore disavows and repudiates any thought and action that may involve the dissemination of ideas based on hatred, violence or superiority for the reasons stated above.

It acts in the same way, impartially and without prejudice, in handling potential or actual conflict of interest situations.

2.6 Collaboration

The company recognises in collaboration an added value, necessary to achieve solid and long-lasting goals, to enable fast production processes, shared planning, new insights and to broaden the vision of the business.

For these reasons, Emsibeth promotes working relationships that are based on fairness and mutual cooperation between the parties. It fosters the development of reciprocal relationships, whereby ideas and information are exchanged in order to create a network of relationships that, based on trust and interdependence, are generative of value for all.

3. SUSTAINABILITY

Pn Emsibeth, sustainability is an integrated value in the business model in order to align its goals with the United Nations 2030 Agenda. The company aims at the m continuous improvement, through the creation of a culture of respect for the common benefit, with the aim of achieving lasting results and expressing the values in which it was founded. Consistent with this vision, the company is committed to actions that foster the pursuit of a positive impact on the environment, people and the economy.

3.1 People

For Emsibeth, the Person is at the heart of the company's values. Human resources are recognised as a fundamental and inalienable component of the Company's value, therefore, its management is based on respect for the dignity, personal and professional characteristics of each of them. Emsibeth is committed to creating a positive corporate culture by valuing differences, listening to the needs and perspectives of the individual, and implementing development plans and programmes aimed at professional training and personal growth.

3.1.1 Human Capital

The Society, recognising the centrality of the individual, emphasises the importance of promoting well-being.

It promotes the proper balancing of work and private life, extending the possibility of working remotely to the majority of workers; it integrates into organisational procedures actions and programmes aimed at protecting and increasing physical and psychological well-being.

3.1.2 Rights Human

The Company supports the Universal Declaration of Human Rights and the International Labour Organisation Declaration. It assures all stakeholders that it respects the national laws on human rights in the countries where it operates and in particular the right to association and collective bargaining, the prohibition of forced and child labour, and non-discrimination in employment.

The company pays particular attention to women's rights and the promotion of diversity as an added value and opportunity for growth.

3.1.3 Excellence

The company pursues excellence in results by recognising that the main strategic resource is the complex of intellectual, technical, organisational and relational skills of each person involved.

For this reason, the company promotes a training that is attentive to the needs of the

3.2 Relations with the territory

individual strengths and is certain that the involvement of employees, together with attention to their needs and expectations, is fundamental in order to define training paths aimed at individual and collective value enhancement.

The Society encourages and supports the development of initiatives favourable to the care and empowerment of marginalised individuals or groups, improving their quality of life. It activates synergies with local authorities and organisations to share projects aimed at generating a positive impact on the local community and integration into the world of work.

3.3 Environment

Emsibeth believes in the principle that a society that produces economic value can only be sustainable if it does not simultaneously compromise social and environmental value.

With this in mind, the company, aware of its responsibilities towards the environment, undertakes to act in full compliance with environmental protection regulations, adhering to the relevant national and international protocols.

Emsibeth, in the course of its business, promotes a constant search for innovation in order to activate processes and design products that are aligned with the emission reduction targets set by the European Union. It favours responsible choices aimed at protecting biodiversity and extending product life cycles. It is active in the design and marketing of products made from recycled and recyclable materials. It is also attentive to the protection of animal welfare.

4. HEALTH AND SAFETY

The Company recognises health and safety in the workplace as a fundamental right, and therefore, in accordance with the provisions of Legislative Decree 81/2008 on the subject, undertakes to ensure

appropriate workplaces and environments, to adopt and maintain management systems aimed at identifying and preventing possible risk situations that could compromise the health and safety of workers.

The Company is committed to spreading and consolidating a safety culture by developing risk awareness and promoting responsible behaviour by all stakeholders.

It ensures a safe, healthy and productive working environment to protect the physical and moral integrity of employees and third parties who have access to the work environment, and monitors the associated risks.

The company recognises its duties and tasks from a strictly organisational point of view with regard to health and safety, but also recalls that it is everyone's responsibility, in the first person, to take care of his or her own health and safety as well as that of the persons present in the same workplace and on whom the negative effects of his or her actions or omissions may fall.

Therefore, within the scope of their duties, everyone is required to participate in the process of risk prevention and safety protection for themselves, their colleagues and third parties.

5. PROCESSING OF SENSITIVE DATA AND INFORMATION CONFIDENTIAL

The protection of natural persons with regard to the processing of personal data is a fundamental right.

The Company undertakes, in compliance with current legislation, to ensure the protection of privacy with regard to information pertaining to the private or confidential sphere, generated and/or acquired within or in business relations, of all those who interact with it, avoiding any improper use thereof.

5.1 Protection of Industrial and Intellectual Property

Emsibeth protects industrial and intellectual property, recognising that adequate protection of this property can promote the progress and innovation of society.

In particular, it undertakes to implement appropriate measures to protect its own and others' industrial and intellectual property.

It is addressed to all addressees of the Code of Ethics, requesting them to take care in order to prevent any violation inherent to the issues expressed.

6. AREAS OF APPLICATION

6.1 Dissemination, dissemination and updating of the Code of Ethics

The present Code of Ethics is brought to the attention of all internal and external stakeholders, who collaborate with the Company and are in any case involved with it, by sharing the Co- says Ethics with internal and external stakeholders and publication on the company website. The Code of Ethics will be subject to annual review.

6.2 Interpretative doubts

Interpretation doubts about the Code of Ethics should be addressed to the General Management of the company: the body responsible for compliance with the Code of Ethics.

6.3 Violation

Violation of the Code of Ethics entails a breach of the trust that underpins the working relationship established with the Company.

It also constitutes a clear breach of the contractual obligations of the employment relationship within the meaning of Article 2104 of the Civil Code, with the consequence that the disciplinary sanctions provided for in the CCNL COMMERCIO CONFCOMM- MERCIO will be applied, in accordance with the procedures laid down in the CCNL and Article 7 of the Workers' Statute.

6.4 Contractual value and penalty system

The provisions of this Code of Ethics are to be considered an integral and essential part of the contractual obligations undertaken towards the Company Emsibeth S.p.A. by all those involved, i.e. all those who have relations with the same pursuant to and for the purposes of the applicable regulations.

Violation of the principles and values expressed in the Code of Ethics will therefore constitute a breach of contractual obligations and/or a disciplinary offence, with the consequent adoption of the sanctions that the varying seriousness of the facts may justify, extending to the consequences provided for by law, both as regards the Company's right to compensation for damages suffered, and the termination of the contract due to the fact and fault of the defaulting party.

6.5 Entry into force

This Code of Ethics enters into force on the date of its approval on 1 March 2023 by the Executive Board with immediate effect. Any subsequent changes and additions are approved by the b-team (a body made up of internal employees in charge of sustainability development) and the Executive Board and disseminated in accordance with the Code of Ethics.

EMSIBETH SpA
Via Murari Brà 35/G, 37136 Verona - Italy
■ T +39 045 503044
www.emsibeth.it

