

EuroItalia

Suppliers

Code of Conduct

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Introduction

EuroItalia S.r.l. (hereafter alternatively “EuroItalia” or “the Company”) has a long history of striving for excellence in the production of its products.

Therefore, it considers it essential to conduct its business ethically and responsibly. As a result, business partners are expected to share this belief and comply with the requirements set out in this Code of Conduct while also engaging their employees, suppliers and subcontractors in this commitment.

The Company has already drafted its Code of Ethics (last updated on 10/07/2023) to establish and promote ethical principles and behavioral rules within its corporate culture, which regards compliance with the law and the principle of legality as essential elements, also to protect its image and reputation in the market. Additionally, the Company has opted to comply with the requirements of Legislative Decree no. 8 June 2001, n. 231, which has integrated into the Italian legal framework the administrative liability of entities in cases involving certain criminal offences committed by individuals in managerial, administrative, or supervisory roles within the Organization itself or by individuals subject to their direction or oversight.

By prioritizing sustainable practices, EuroItalia aims to achieve the highest ethical and sustainable business standards. To maintain the relevance of its contents and to foster continuous improvement in the covered areas, the Code of Conduct is intended to be periodically reviewed and adapted, if necessary, to meet legislative requirements, to be aligned with the company's core principles and actions and to maintain industry best practices.

The Code is structured into the following sections:

- *Scope*, which defines the recipients and objectives of the Code;
- *Our values*, which illustrate the fundamental principles that guide EuroItalia's business strategies;
- *Ethics and corporate integrity, respect for the environment, responsible production, Protection of Human Rights and Labor and Compliance and Monitoring*: these five sections outline the primary requirements to be met related to environmental, social and governance issues;
- *Code Compliance*, which provides information regarding the communication of the Code, compliance, monitoring and audit activities.

1. Scope

This Code applies to all suppliers of goods and/or services and contractors, identified below as “suppliers”, who have a business relationship with EuroItalia.

EuroItalia requests its suppliers to ensure the dissemination of this Code of Conduct to its vendors, suppliers, contractors and other individuals or legal entities with whom they have business relationships. They should also take all necessary measures to ensure that these entities comply with the provisions of this Code of Conduct relevant to the contractual and commercial relations between EuroItalia and its supplier, enabling compliance monitoring at all levels of the supply chain.

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2. Our values and our business idea

EuroItalia's values are based on fairness, loyalty, integrity and transparency, which are the cornerstones of the behavior of corporate bodies, employees and all those working towards achieving the company's objectives. These values are ingrained in the Company's philosophy and enable it to build long-term relationships with its business partners.

Furthermore, EuroItalia believes in the importance of diversity and inclusion and encourages dialog among individuals involved in all its business processes to promote collaboration and mutual progress along the supply chain in a sustainable way.

Suppliers are therefore expected to share the values of EuroItalia, to promote honest communication and actions and to respect the highest standards in ethics, integrity, fairness, social and environmental responsibility.

For further details, please refer to the chapter "relationships with suppliers" in the EuroItalia's Code of Ethics.

3. Business Ethics and Integrity

EuroItalia is committed to engaging in business relationships with Partners who adhere to high ethical standards. For this reason, the company expects all Business Partners to conduct their business with honesty and integrity and to demonstrate the highest standards of business ethics.

3.1 Business Ethics Standards

Suppliers must support fair commercial practices in support of free competition on the market and must not violate antitrust laws or engage in illegal cooperation with competitors. Price-fixing, bid manipulation, market allocation or any other conduct that restrict free competition is prohibited. EuroItalia expects honest dealing and truthful revelations in written and verbal interactions, including marketing and advertising.

3.2 Compliance with national laws and regulations

Business relationships must be built on mutual respect and compliance with legal requirements. EuroItalia's suppliers are required to comply with local, national and international laws and regulations relating, but not limited to, human rights, health and safety, working practices, respect for the environment and animals, anti-corruption and economic compliance, as well as the safety and quality of goods and services and compliance with the principles/requirements set forth in this Code. Suppliers are also expected to implement structured management systems (e.g., appropriate procedures, policies, business processes, accounting systems and communication mechanisms) in order to operate with the highest reliability and transparency and to identify, correct and improve social, environmental, health and safety impacts.

If such provisions differ from applicable laws, suppliers must comply with the highest and strictest standards to avoid violations of laws and regulations that conflict with the scope and principles set forth in this Code. Such cases will be transparently communicated to EuroItalia, as indicated in the acceptance form.

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EuroItalia strongly encourages suppliers to freely discuss any concerns or doubts regarding the applicability of the law and the code requirements, and to consult the Company whenever there is uncertainty about the appropriate behavior to maintain on a case-by-case basis.

3.3 Anti-Corruption

EuroItalia places particular emphasis on the fight against any form of corruption or extortion. Suppliers are therefore required to comply with applicable anti-corruption laws and have adequate internal controls to prevent and detect acts of corruption.

Suppliers must also comply with all applicable laws prohibiting financial fraud, money laundering and tax evasion.

EuroItalia does not offer, either directly or indirectly through third parties, illegal payments, bribes, or other advantages to any government official, political party, or government-controlled entity, nor to any individual working for a private-sector entity, for the purpose of obtaining, improperly retaining or directing commercial services or other services. Gifts given with the purpose of influencing, or with the intent or prospect of influencing, the recipient's business decision-making process are also strictly prohibited.

3.4 Conflicts of Interest

Suppliers must comply with applicable laws on conflict of interest, to make objective business decisions and to avoid situations of conflict of actual or potential interests that extend to employees and their families, or situations that may create or be perceived as favoritism, unfair advantages and collusive practices.

Suppliers must report to EuroItalia any situation that may be perceived as conflicts of interest.

3.5 Privacy and Protection of Personal Information

Suppliers are required to comply with applicable data protection laws, including European Union data protection laws and regulations, which are extremely important to EuroItalia as an Italian company.

Suppliers are also required to implement security systems, including cybersecurity tools, in order to guarantee the confidentiality and intended use of the information obtained throughout the entire business relationship with EuroItalia as well as shared with employees, subcontractors and any authorized external parties.

3.6 Conflict Minerals

EuroItalia adheres to the Conflict Minerals policy and aims to discourage the use of minerals such as gold, tantalum, tin and tungsten, whose trade could finance violent conflict, corruption, and money laundering in Central Africa, in countries such as the Democratic Republic of Congo, the Central African Republic, Angola, Burundi, Rwanda, Sudan, Tanzania, Uganda and Zambia. Suppliers must promptly notify EuroItalia if any of these minerals are deemed necessary for the functionality or production of a product or component.

4. Respect for the environment

The Company promotes respect for the environment, considering it as a common resource to be safeguarded for the benefit of the community and future generations, with a view to sustainable development. EuroItalia, therefore, commits itself and encourages its Business Partners to plan a development of its activities in full compliance with the applicable laws and regulations.

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4.1 Environmental Standards

Suppliers must comply with applicable environmental laws, regulations, and national and international industry legal requirements.

EuroItalia encourages its suppliers to implement concrete measures to prevent, minimize and remedy the negative environmental impacts of their activities, products, and services, including its value chain, through a proactive approach and responsible management.

The implementation of certified environmental management systems in line with international standards, such as ISO 14001, ISO 50001 or EMAS, is strongly recommended for production processes or with significant environmental impacts.

4.2 Energy consumption and GHG emissions

Suppliers are called upon to continuously improve the environmental performance of their activities, by reducing energy consumption and therefore GHG emissions, in order to contribute to the fight against climate change and to the achievement of national and international emission reduction targets.

For this purpose, EuroItalia encourages Suppliers to identify and monitor all relevant energy consumption sources, through the implementation of a program dedicated to the reduction of energy consumption and emissions, which can be achieved through: the use of low-carbon technologies and equipment, the shift to certified renewable energy sources, when possible, and the choice of low-carbon emission transportation methods and route optimization.

4.3 Waste management

Suppliers are required to comply with all applicable environmental laws and regulations on waste management, with particular attention to regulations concerning hazardous waste.

Suppliers are required to: obtain and maintain appropriate permits for the disposal of waste on site; refrain from open burning and/or disposal of waste by landfill; deliver waste for processing and disposal off-site only to contractors authorized by the competent authority.

EuroItalia promotes a collaboration with the Suppliers for the research of circular and repair solutions and for the recycling of waste in all their operations and business activities. A commitment to reduce waste associated with production processes and packaging is required, in particular:

- to enhance the recycling and reuse of waste and defective products;
- to reduce the weight and dimensions of glass, cardboard and plastics;
- to use recycled or bio-based materials, whenever possible.

Training of supplier employees is also encouraged to raise awareness of virtuous waste reduction and disposal practices, especially for line workers.

4.4 Animal health and welfare standards

In order to ensure the promotion of respect for biodiversity and ecosystems, EuroItalia requires its Suppliers to adhere to recognized best practices in animal health and welfare.

If animals are involved at any stage in the supply chain, they must receive adequate care and living conditions (e.g. food, water, freedom of movement, decent living conditions and specific conditions that may be necessary for certain species), as well as minimal suffering.

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EuroItalia, in compliance with the European Union directives which, through Directive 2003/15/EC, has established the prohibition of animal experiments on finished cosmetic products since September 2004, requires its Suppliers to make a strong commitment: whenever possible, in products where animal parts are often used, the use of synthetic products (for example, preferring brushes with synthetic bristles) is encouraged.

5. Responsible Production

EuroItalia believes that the creation and development of the product are a priority because it is directly linked to the safety of the product itself. In addition, given the growing demand for increasingly innovative products, EuroItalia encourages and supports its Suppliers to develop improved and reformulated versions of traditional products.

5.1 Safety and quality of products

EuroItalia believes that the quality and safety of its products are fundamental, given the importance that the company itself reserves to its customers and people along its value chain.

For this reason, EuroItalia requires its suppliers to comply with all the highest quality and safety requirements, starting from the provisions outlined in national and international regulations. In particular, EuroItalia requires its Suppliers to comply with international standards, including 22716/2007 GMP (good manufacturing standards specific to cosmetic products that guarantee their safety) and ISO 1907/2006 REACH (relating to the registration, evaluation, authorization and restriction of chemicals). Suppliers must have strict controls to manage quality and safety assurance and have mechanisms to document compliance with regulations and business needs. By accepting this code, the Supplier hereby declares its commitment to meet these requirements and to share it with its suppliers, workers, manufacturing facilities and subcontractors.

Suppliers must also comply with international and local regulations regarding the use of hazardous or restricted substances, avoiding the use of materials that could harm the health and safety of consumers and those who may be exposed to such products along the production chain. They are encouraged to use, where possible, the least harmful substances available for the benefit of the environment and health.

Suppliers must also ensure that workers involved in production activities receive adequate training on these issues, in order to perform their work effectively and ensure that the highest standards are respected.

5.2 Product Sustainable Development

EuroItalia pays particular attention to the production process of the products it distributes.

In line with EuroItalia's objectives, suppliers are required to comply with the principles of "Green Chemistry", an approach to chemistry based on maximizing process efficiency and minimizing effects on human health and the environment, in order to ensure an increased percentage of biodegradability in the production of essences.

With the aim of going beyond the mere compliance of the sustainability frameworks, EuroItalia aims to enable sustainability through its culture of circular economy, by encouraging its Suppliers to continuously improve the environmental performance of their products, while paying great attention to their life cycle.

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To ensure this, the training of Suppliers employees is encouraged to raise awareness of best practices in recycling, reuse, and upcycling, as part of the global manufacturing process, and to promote the ongoing search for new sustainable solutions.

5.3 Raw Materials Traceability

The traceability of ingredients and raw materials is essential for EuroItalia in order to ensure compliance with the strict applicable regulations and to meet the highest standards of health and safety. On one hand, this aspect allows monitoring all aspects related to the sustainability of the product itself and its ingredients, on the other hand, identifying any risks in the various levels of the supply process.

Therefore, EuroItalia requires its Suppliers to ensure the traceability of the products supplied, providing all necessary information concerning the origin of the raw materials, the Supplier's procurement process and the product manufacturing processes, necessary to guarantee the transparency of EuroItalia's supply chain.

6. Protection of Human Rights and Workers

EuroItalia recognizes the centrality and importance of human resources, aware that the main factor of success of each company is the professional contribution of the people working within it, in a framework of mutual respect and trust.

To this end, the Company promotes respect for the physical and cultural integrity of individuals and the guarantee of equal opportunities for all employees.

6.1 Labor and Human Rights Standards

EuroItalia is committed to respecting human rights throughout the value chain and to ensuring safe and healthy working conditions, requiring the same commitment from its Suppliers. The commitment relates to internationally recognized human rights as defined in *the ILO's Declaration on Fundamental principles and Rights at work* and the *UN Convention on the Rights of the Child*. In addition, the company recommends an approach based on *the guiding principles of Business and Human Rights* (UNGPs) and *OECD Guidelines for multinational Enterprise (OECD)*.

6.2 Diversity, Inclusion, Gender Equality

EuroItalia expects its Suppliers to value diversity, encourage inclusion, ensure a professional work environment free of discrimination or harassment, and protect and integrate vulnerable people, who are at greater risk of harassment and unfair treatment. It thus expects equal employment opportunities to be guaranteed and, subsequently, employment decisions to be based solely on relevant and objective criteria.

6.3 Wages, Compensation and Benefits

According to the provisions of the ILO Conventions, and considering the principle of equal pay, suppliers are required to provide employees with wages and benefits that, at a minimum, comply with the applicable laws in each country or region. While overtime is often required in production areas, Suppliers must perform operations to limit overtime to a level that ensures human and productive working conditions and meets local legal requirements and pay overtime in accordance with all legal requirements. They are also required to maintain a transparent and reliable system for recording working hours, wages and overtime for all employees.

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6.4 Harassment, coercion and abuse

Suppliers must explicitly prohibit and must not support or permit any form of harassment, coercion or abuse of employees in the workplace. Harassment is defined in the Code of Ethics any undesirable behavior that harms the dignity and personal freedom of employees, such as those related to race, gender or other personal characteristics.

6.5 Freedom of association and collective bargaining

EuroItalia asks its partners to recognize and respect the right of employees to form and join trade unions, to perform their functions of representation in the workplace and to negotiate collectively, in accordance with the applicable laws. Partners may not attempt to influence employees to join a particular trade union and may not license employees due to their union affiliation. In negotiations with workers' representatives, a constructive approach and relationship is required.

6.6 Forced labor and child labor

Partners must not participate in or benefit from any form of forced labor, including slavery or servitude, involuntary prison labor or trafficking in human beings. EuroItalia, based on *the UN Convention on the Rights of the Child and adolescence*, rejects child labor, defined as “work activity that deprives children and girls of their childhood, of their dignity and negatively affects their psycho-physical development” (ILO). If young workers are employed (always above the minimum age required by applicable law), the supplier must demonstrate that they are not exposed to excessive physical risks that can damage physical, mental or emotional development.

6.7 Occupational Health and Safety

Suppliers are required to commit themselves to ensuring individual dignity-respecting working conditions and safe and healthy working environments, including through the promotion of a culture of safety and risk awareness, encouraging responsible behavior by all in compliance with the company's procedures and applicable safety regulations.

For further details, please refer to the chapter “Protection of Health and Safety at work” in the EuroItalia’s Code of Ethics.

7. Monitoring and Compliance

EuroItalia is committed to building a resilient and responsible supply chain working together with suppliers in a climate of dialog, respect and collaboration for mutual improvement. Therefore, with the aim of pursuing this objective, the Company provides its Suppliers with the Code of Conduct, to facilitate continuous improvement through the identification, assessment and mitigation of social, environmental and legal risks in the supply chain.

7.1 Monitoring activities

In order to help Suppliers strengthen their sustainability performance, EuroItalia requires them to submit to a Checklist/Evaluation Questionnaire, to be completed before the start of the business relationship and/or on a continuous basis for the duration of the supply. The aim of the questionnaire is to improve sustainability practices along the supply chain by assessing policies and initiatives relating to human rights, environmental protection, health and safety, product liability and business ethics.

In order to facilitate the implementation of the requirements outlined in this Code and in the Evaluation Checklist, EuroItalia reserves the right to monitor compliance by conducting on-site or

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remotely audits at Suppliers' premises, as well as Sub-Suppliers and any other parties involved, whether announced or not, either independently or with the support of external, independent and specialized third parties. By signing this Code, suppliers express their willingness to be audited. In order to facilitate these checks, Suppliers are required to update information on the substances used and to make such documentation available, on request, with any relevant certification obtained, where applicable, as well as to provide full access to their facilities for carrying out inspections and collecting information, if necessary. EuroItalia also reserves the right to carry out chemical tests on raw materials, semi-finished products and finished products and to ask its suppliers for information about its subcontractors to guarantee full traceability (e.g. geographical location of all the plants involved, origin of the fundamental raw materials used). On-site visits may also be carried out to directly verify existing practices, working methods and the organizational process.

Suppliers must comply with the Code and applicable laws and strive to continuously improve their sustainability performance, through the implementation of the Code requirements. EuroItalia will evaluate any possible non-compliance on a case-by-case basis and take measures according to the type and severity of the situation. Suppliers may be required to take corrective action to align their activities to meet the Code guidelines within an agreed period of time. In the event that a Supplier or another third party becomes aware of an actual or potential non-compliance with this Code or any other non-ethical behavior, it is encouraged to report it to EuroItalia at sustainability@euroitalia.it.