



ANGELINI

ANGELINI BEAUTY S.p.A.

CODE OF ETHICS AND CONDUCT

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1. INTRODUCTION

This document, known as the “Code of Ethics” or the “Code”, adopted by the Board of Directors, sets forth the set of rights, duties and responsibilities which Angelini Beauty S.p.A. (hereinafter “Angelini Beauty”) and its employees expressly utilize in their dealings with *stakeholders or interested parties*¹ with whom they come into contact whilst performing their everyday activities.

This Code lays down a series of ethical principles and values on which the activities of everyone working at Angelini Beauty must be based, bearing in mind the importance of their roles, the complexity of their functions and the responsibilities entrusted to them for the purpose of achieving Angelini Beauty's objectives.

¹*Stakeholders* means those categories of individuals, groups or institutions whose prospects are affected by the way corporate activities are performed and which may contribute to achieving Bertani's objective in different ways.

The following are *stakeholders*: customers, suppliers, shareholders and affiliated companies, partners and competitors, the Public Administration, the public, environment and future generations.

2. RECIPIENTS

The provisions of this Code apply to everyone, with no exceptions, working at Angelini Beauty and, therefore, to directors, managers, employees, collaborators, suppliers and all who, directly or indirectly, permanently or temporarily, work for the company.

In particular, purely by way of an example:

- members of the Board of Directors follow the principles of the Code when establishing the objectives of Angelini Beauty;
- directors implement the values and principles contained in the Code, by accepting both their internal and external responsibilities and consolidating the trust, cohesion and spirit of Angelini Beauty;
- employees and regular collaborators, in compliance with current law and regulations, act and behave in accordance with the principles, objectives and undertakings envisaged by the Code;

The Code also establishes appropriate measures for punishing behaviors which are not compliant with its predictions and not proportional to the gravity of the same.

An ethical focus is vital for the reliability of Angelini Beauty's behavior towards shareholders, customers and, more generally, the entire social and economic context in which Angelini Beauty operates.

The adoption of some specific behavioral rules, which must be observed when dealing with the Public Administration, the market and third parties also confirm Angelini Beauty's commitment regarding the prevention of the offenses pursuant to Legislative Decree 231/2001 and subsequent modifications and additions hereto.

For these reasons, it is important to clearly define the set of values that Angelini Beauty recognizes, accepts and shares, and the set of responsibilities that it takes upon itself concerning its internal and external relations.

These requirements are catered for by the contents of this Code, observance of which by all company staff is of fundamental importance for the performance, reliability and reputation of Angelini Beauty.

Angelini Beauty will disseminate the Code of Ethics, by means of specific communication activities, to all those with which it has business relations.

3. BASIC ETHICAL PRINCIPLES

3.1 Foreword

Our reactions in situations involving ethical problems are affected by many circumstances, but ethics substantially implies honesty, broadmindedness, loyalty and responsibility.

Ethics, therefore, requires a clear and conscious commitment to do the right thing, to behave correctly, often by simply using one's common sense.

3.2 Purpose

The purpose of the principles of conduct in business activities can be summarized as follows:

- highlighting the need for an ethical approach in the business activities performed by Angelini Beauty, supporting its ethical principles and special values;
- implementing Angelini Beauty's behavioral principles through their constant application while carrying out business activities;
- supporting the commitment of Angelini Beauty for wholesome and correct corporate administration, safeguarding corporate assets for the benefit of all *stakeholders*;
- Given that the moral integrity of Angelini Beauty employees stands at the basis of relationships with business partners, customers, suppliers, and the community itself, employees are required to observe the strict principles of ethical behavior while performing their activities.

3.3 General principles

A fundamental principle for Angelini Beauty is compliance with current laws and regulations; consequently, each Angelini Beauty employee must strive to observe current laws and regulations.

This commitment must also apply to suppliers, customers and anyone who has relationships with Angelini Beauty, which will not start nor continue

relations with anyone who does not intend to commit to the principle of strict compliance with the law.

Ethics does not simply involve the need to identify what is legal in a given situation, but it also requires to do what is morally correct and responsible when doing business, without compromising on moral principles (honesty, legality, loyalty, reliability, reciprocal respect and dignity, responsibility, transparency).

Angelini Beauty employees must act with integrity and be frank, honest and loyal in all aspects of their work, and expect the same behavior from everyone they do business with.

3.3.1. Enhancement of human resources and personal integrity

Angelini Beauty safeguards and promotes the value of human resources in order to increase the skills of each employee and promotes the respect for individual physical, moral and cultural integrity.

Angelini Beauty guarantees working conditions that are respectful of personal dignity and safe working environments; it safeguards and promotes the value of human resources, in order to improve and increase the skills of each employee and collaborator.

3.3.2 Legality

Angelini Beauty carries out its activities complying with all laws and regulations in force in the regions in which it operates, as well as this Code and all corporate procedures, applying them honestly and fairly.

3.3.3 Confidentiality

Angelini Beauty considers the personal information and data it processes as strictly confidential and protects the information acquired in the course of its business activities.

It will not use this information in its own interest for the purpose of making an unfair profit or according to methods that are illegal or harmful to Angelini Beauty's objectives.

In addition to this, its collaborators are required not to use confidential information for purposes other than the performing of their professional activities.

3.3.5 Honesty and fairness

The pursuit of Angelini Beauty's interest can never justify behavior contrary to the principles of fairness and honesty.

Relations with *stakeholders* of Angelini Beauty are based on criteria of fairness, collaboration, loyalty and mutual respect.

The directors, managers, employees and collaborators of Angelini Beauty perform their activities in the company's interest and may only accept gifts, presents and benefits for reasons of common courtesy and if they are of a modest value and appropriate for the occasion in question. They shall not be subject to any type of pressure, which would influence their behavior for external interests.

Furthermore, the Group promotes the dignity, the autonomy and the value of its employees.

3.3.6 Social responsibility

Angelini Beauty is aware of the effects of its activity on the reference context and on the social-economic development.

For this reason, it intends to consistently make its investments in respect of the environment and the requirements of the local and national communities, whilst promoting initiatives of scientific, cultural and social value in order to obtain a constant improvement of its reputation and social standing.

3.3.7 Transparency

Angelini Beauty strives to clearly, precisely and transparently inform all *its stakeholders* with regard to its economic and management situation and performance, without accommodating any interest group or single individual, so as to put stakeholders in a position to make independent and informed decisions.

3.3.8 Fight against corruption and conflicts of interest

Angelini Beauty, in line with its values of honesty and transparency, strives to implement all the measures required to prevent and avoid phenomena of corruption and conflict of interest.

The latter occurs both when a collaborator attempts to unfairly allocate stakeholders' interests or gain a “personal” advantage from Angelini Beauty's business opportunities and when the representatives of customers, suppliers or public institutions do not act in accordance with the fiduciary duties connected with their positions.

In addition, sums of money must not be paid nor accepted, nor other forms of corruption may be exercised and no gifts or favors may be made to or accepted by third parties for the purpose of obtaining direct or indirect advantages for Angelini Beauty.

3.3.9 Quality of products and services

Angelini Beauty's primary objective is to optimize the satisfaction and safety of its customers, also paying attention to the requests that may lead to an improvement in product and service quality.

Angelini Beauty therefore strives to monitor the changing market requirements and to constantly improve the quality of products and services it offers to all its customers.

For this purpose, its research, development, production and marketing activities are based on the highest quality standards.

3.3.10 Impartiality

In its relations with the *stakeholders*, Angelini Beauty abstains from all forms of discrimination, including age, gender, sexuality, health, marital status, race, political opinion and religious beliefs.

3.3.11 Environmental protection

The environment is a primary asset that must be protected; in line with this principle, Angelini Beauty plans its activities by striking the best possible balance between economic initiatives and environmental needs, considering the rights of present and future generations.

Angelini Beauty therefore strives to prevent risks for the public and the environment, in accordance with current regulations.

3.3.12 Equity of authority

Angelini Beauty strives to ensure that authority is exercised fairly and correctly in its contractual relations involving the establishment of hierarchical relationships, preventing all types of abuse.

3.3.13 Shareholder relations

Shareholders require all available information in order to make correct investment decisions and corporate deliberations.

Angelini Beauty therefore strives to establish and maintain all the conditions necessary to ensure the informed and widespread participation of shareholders in the decisions they are responsible for.

Angelini Beauty also works to ensure that its economic/financial performance generates an increase in the value of the company by adequately remunerating the investment risk taken by its shareholders.

3.3.14 Tests on animals

Angelini Beauty does not perform nor commission tests on animals, according to what provided for in the relevant European regulation.

A guarantee concerning not only finished products but also raw materials. The European regulation on cosmetic products prohibits tests on animals of

finished products. Furthermore, on 11th March 2009, the prohibition entered into force to market inside the EU not only cosmetics whose final formulation is subject to animal testing but also products which contain ingredients tested on animals outside the European community.

In March 2013, the prohibition entered into force to market cosmetic products containing ingredients tested for specific toxicity studies (repeated-dose toxicity, reproductive toxicity and toxicokinetics) on substances to be used for cosmetic purposes.

4. PRINCIPLES OF CONDUCT IN EMPLOYEE RELATIONS

Respect for people and their professional development are essential values for Angelini Beauty, together with the awareness that the comprehensive relational, intellectual, organizational and technical skills of each manager, employee and collaborator are a true advantage and a strategic resource for Angelini Beauty.

When performing their professional activities, Angelini Beauty staff shall behave in accordance with the general principles of interaction with the *stakeholders* and the requirements contained in the contracts, in observance of the technical independence of each.

For this purpose, when dealing with managers, employees and collaborators, Angelini Beauty bases its conduct on some primary principles described below.

4.1 Staff selection and management

Staff members are hired according to their professional profile, which shall match job profile and suit corporate needs.

Therefore, staff is searched and selected according to criteria of objectivity, equity and transparency, ensuring equal opportunities and avoiding any form of favoritism, nepotism and patronage.

The information required is necessary and sufficient to verify the candidate's professional and psycho-attitudinal profile, in full respect of their private lives and opinions.

As in the selection stage, the decisions taken in the staff management and development processes are based on the actual conformity of employees' profile and the required profiles and on objective considerations about the expected and real performance.

Angelini Beauty prohibits all and any form of psychological, physical or sexual harassment towards managers, employees, collaborators, suppliers, customers or visitors. By harassment, we mean any form of intimidation or threat that prevents people from peacefully performing their duties or the abuse of authority by their superior.

Anyone claiming to have been subject to harassment or discrimination for any reason may report the fact to the Supervising Body.

Acts of retaliation against employees who refuse, complain of, or report such unpleasant episodes are forbidden.

4.2 Health, safety and environment

Angelini Beauty has always been committed to promoting, spreading and consolidating the culture of safety, raising all its employees' awareness about the risks and their attitude towards responsible behaviors; as far as prevention is concerned, it operates to safeguard the employees' health and safety.

Therefore, Angelini Beauty protects the environment and pays special attention to the creation and management of suitable working areas and environments from the employees' health and safety point of view, in compliance with national directives.

4.3 Privacy protection

Angelini Beauty follows the regulations concerning the confidentiality of personal data, as per Legislative Decree no. 196 of 2003, known as the "Data Protection Act", and subsequent modifications, additions and implementation regulations.

With regard to the processing of employees' personal data, Angelini Beauty takes special care in informing each employee of the nature of the personal data processed by Angelini Beauty, the processing methods, the subjects it is communicated to and, in general, any information referring to them.

4.4 Duties of managers, employees and collaborators

4.4.1 Diligence and good faith

Each employee and collaborator of Angelini Beauty shall act loyally and in good faith, respecting the duties undersigned in the employment contract, ensuring the requested performance and giving a personal contribution of ideas, initiative and enthusiasm, essential contributions for the balanced and long term development of the company.

They shall also know and observe the ethical regulations contained in this Code and base their conduct on mutual respect, cooperation and collaboration

Regardless of their role and/or level of responsibility, Angelini Beauty staff must know and implement the provisions established by Angelini Beauty in terms of environmental protection, occupational safety and hygiene and protection of *privacy*.

4.4.2 Conflict of interest

Angelini Beauty employees and collaborators must avoid situations in which conflicts of interest may arise and must not perform activities that may potentially conflict with Angelini Beauty interests.

Purely by way of example, conflicts of interest can include:

- a business interest, evident or concealed, of an employee or a member of their family in a supplier, customer or competitor activity;
- the exploitation of their position in order to promote interests contrasting with those of Angelini Beauty;

- the use of information acquired during business activities to their advantage or that of third parties contrasting with the interests of Angelini Beauty;
- working activities of any kind (labor or intellectual) for customers, suppliers, competitors and/or third parties contrasting with those of Angelini Beauty;
- the conclusion, stipulation or start of negotiations and/or contracts, in the name and on behalf of Angelini Beauty, with an employees' family members or partners, or legal persons of which they are the owner or in which they have an interest;
- acceptance of money or other benefits or favors of individuals or companies which enjoy or intend to enjoy business relationships with Angelini Beauty.

It is forbidden for an employee to take personal advantage of business opportunities that came to their knowledge whilst performing their activities at Angelini Beauty.

Before accepting a consulting, management, administration job or other tasks in favor of another subject, or if a real or potential conflict of interest arises, each employee must inform the Management Representative accordingly.

If the report is not followed up or the employee feels uncomfortable about reporting to his/her direct superior, he/she may contact the Supervising Body.

4.4.3 Safeguarding company assets

All members of company bodies, managers, employees and collaborators must operate to safeguard the company assets.

They are also responsible for protecting the corporate resources allocated to them and must promptly inform their direct superiors of any matters that may be potentially damaging for Angelini Beauty.

Everyone must feel responsible for the company assets (tangible and intangible) that they use to perform their activities.

Angelini Beauty reserves the right to prevent and, if necessary, to regulate the use of its assets by establishing accounting, reporting, financial control and risk analysis and prevention systems, subject to the requirements of current regulations (protection of *privacy*, workers' statute of rights, etc.).

In particular, all members of company bodies, managers, employees and collaborators are required to:

- strictly observe company policies;
- always use professional language, both in written and verbal form, without any elements that may cause personal offense and/or damage the corporate image;
- use the Internet strictly according to the relevant internal regulations.

4.4.4 Accounting transparency and accuracy

All transactions and operations performed must be adequately recorded and it must be possible to verify the relevant decision-making, authorization and performance processes.

Each transaction must be properly documented in order to allow the characteristics and reasons for the operation to be checked at any time and to identify those who authorized, performed, recorded and verified the transaction concerned.

Accounting records must be accurately, completely and promptly kept in compliance with the company's accounting procedures, in order to give a true representation of corporate assets/finances and of management activities.

Accounting entries include all the documents which numerically represent management events, including internal expense reimbursement reports.

All accounting information, both general and analytical, must comply with the principles of clarity, transparency, correctness, completeness and accuracy.

Staff members who become aware of omissions, errors or falsifications of accounting entries must promptly inform their superior accordingly.

Staff responsible for drawing up forecasts for budget purposes must work according to prudential criteria, supported by knowledge of accounting or

more specific techniques concerning the sector involved and, in any case, with the diligence required from experts in the sector.

No false or artificial accounting record may be entered in Angelini Beauty ledgers for any reason.

No measures may be taken for the purpose of preventing or obstructing the performance of all control or auditing activities that are legally attributed to partners, other company bodies or auditing firms.

In this regard, Angelini Beauty strives to guarantee maximum cooperation and transparency in its relations with the auditing firms and the Board of Statutory Auditors.

No employee may perform unlawful activities, even on the request of a superior.

The entire organizational structure is responsible for implementing an effective internal control system. Company managers must make sure that other employees and collaborators perform the tasks they have been assigned in this respect.

4.4.5 Money laundering

Angelini Beauty is committed to observing all national regulations and provisions concerning money laundering.

Angelini Beauty employees must not establish relationships nor stipulate agreements with business partners if they are aware that their interlocutors are involved in laundering money deriving from illegal or criminal activities.

5 PRINCIPLES OF CONDUCT IN CUSTOMER RELATIONS

Customers are a fundamental asset of Angelini Beauty.

Angelini Beauty bases its dealings with customers on the principles of transparency, reliability, responsibility and quality.

All members of company bodies, managers, employees and collaborators of Angelini Beauty must therefore:

- carefully observe the provisions of this Code and the internal procedures governing the management of relations with the customers, as well as all contractual provisions defined in accordance with the current legislation;
- ascertain the quality and the reliability of the products and services offered;

5.1 Contractual relations with customers

Contractual relations and communications with the customers of Angelini Beauty are based on the principles of correctness, honesty, professionalism, transparency and, in all cases, maximum collaboration.

5.2 Advertising

Angelini Beauty has always stood out for its innovative and creative advertising.

Angelini Beauty continues to pursue these values and is committed to adopting an advertising policy which respects people's freedom and dignity with respect for responsible consumption of alcoholic beverages.

In particular, Angelini Beauty advertising must not encourage an excessive and morbid consumption of alcoholic beverages, suggest violent, aggressive or socially dangerous forms of behavior or imply that alcohol can solve existential or physical problems.

Angelini Beauty ensures that alcoholic beverages are not presented in a way which might encourage consumption among minors.

6 PRINCIPLES OF CONDUCT IN SHAREHOLDER RELATIONS

It is a primary interest of Angelini Beauty to add value to the investment of its shareholders by implementing an industrial policy which assures an

adequate long-term financial return through the optimization of available resources and the increase in competitiveness and financial solidity.

6.1 Market transparency

Angelini Beauty pursues the objective of assuring full external transparency of management decisions and performance.

Angelini Beauty provides complete, correct, symmetrical and prompt information to allow investors to base their decisions on strategic corporate choices, management performance and the expected return of their investments.

7 PRINCIPLES OF CONDUCT IN *SHAREHOLDER* RELATIONS

7.1 Data processing

Data referring to stakeholders is processed in full respect of the confidentiality and *privacy* of the interested parties by means of specific data protection procedures.

In particular, Angelini Beauty:

- ensures proper separation of roles and responsibilities;
- classifies information according to incrementing levels of criticality and adopts adequate countermeasures at all processing stages;
- requires third parties involved in processing to sign confidentiality agreements;

7.2 External communications

Angelini Beauty communication to its *stakeholders* (even through the media) respects their right to information; it is forbidden to spread false or biased news or comments.

All forms of communication:

- are based on compliance with the law, regulations and good professional conduct;

- are clear and transparent;
- protect, among other things, industrial secrets;
- quote the relevant sources;
- .

Media relations are exclusively reserved to the authorized functions.

It is forbidden to apply pressure or attempt to improperly get favorable treatment from the media.

7.3 Competition

Angelini Beauty strives to compete with the companies belonging to its sector, without participating in any form of collusive behavior or abuse of dominating position which may breach the principle of fair competition.

Angelini Beauty does not deny, conceal, nor delay any information required by the antitrust authority or by regulatory bodies in their inspection functions and actively collaborates during investigations.

7.4 Patents, trademarks and copyrights

The protection of Angelini Beauty's intellectual property, such as patents, industrial secrets, copyrights, trademarks, technical and scientific knowledge, know-how and skills acquired during corporate activities, is fundamental for maintaining the company's competitive advantage.

Employees are required to define, protect, maintain and defend the rights of Angelini Beauty in all fields of intellectual and commercial property and to exercise these rights in a responsible way.

As well as protecting Angelini Beauty's intellectual ownership rights, the intellectual ownership rights of other parties must also be respected.

The unauthorized use of the intellectual ownership rights of other parties may expose Angelini Beauty to civil lawsuits and claims for compensation; the theft and misappropriation of intellectual property may lead to high fines and criminal penalties for Angelini Beauty and for the individual.

8 PRINCIPLES OF CONDUCT IN SUPPLIER RELATIONS

8.1 General rules of conduct towards suppliers

Angelini Beauty bases its dealings with suppliers on the principles of transparency, equality, loyalty and free competition.

In particular, Angelini Beauty managers and employees must:

- observe and respect applicable legal provisions and contractually agreed conditions in supplier relationships;
- scrupulously observe the internal procedures governing the selection and management of relations with suppliers;
- obtain the cooperation of suppliers to make sure requirements are met in terms of quality, cost and delivery times of goods or the provision of services;
- observe the principles of transparency and completeness of information in correspondence with suppliers;
- avoid being conditioned by third parties with regard to decisions and/or actions relating to their working activities.

8.2 Choice of suppliers

The requisition processes are focused on achieving the maximum financial advantage for Angelini Beauty whilst safeguarding its image.

For this purpose, the Angelini Beauty managers and employees responsible for the corporate functions and participating in such processes must:

- ensure that all suppliers, in possession of the necessary requirements, have equal opportunities of participating in the selection process;
- ensure that more than two suppliers participate in the selection process, except for special cases and governed by specific corporate processes;
- ensure, also by means of suitable documentation, that the suppliers participating in the selection process have enough financial, structural and organizational means, technical expertise and experience, quality

systems and resources to satisfy the requirements and protect the image of Angelini Beauty.

8.3 Integrity and independence in supplier relations

Relations with suppliers are governed by general ethical principles of Angelini Beauty and are constantly monitored by Angelini Beauty.

8.4 Safeguarding ethical principles in supplies and business agreements

Angelini Beauty makes the content of this Code available to suppliers.

The parties of the contract must sign declarations that they are familiar with the principles of the Code and agree not to persuade in any way Angelini Beauty or its managers, employees or collaborators to breach the principles specified in the Code.

8.5 Gifts and other benefits received from suppliers

Angelini Beauty's managers, employees and collaborators must avoid to receive directly or indirectly (through relatives, friends or acquaintances): money or other benefits from any party other than Angelini Beauty for the purpose of performing an official act or an act contrary to their official duties;

gifts, hospitality or other benefits, except for reasons of common courtesy and if they are of a modest value and appropriate for the occasion in question.

Managers, employees and collaborators who receive gifts or other benefits that are not in line with the above must take appropriate action to refuse the gift or other benefit and inform their direct superior accordingly. If the report is not followed up or the manager or employee or collaborator feels uncomfortable about reporting to his/her direct superior, he/she may contact the Supervising Body.

8.6 Ethical aspects in the supplies

Breaching the general principles of the ethical code shall cause sanction mechanisms, which also aim to prevent offenses against the Public Administration or environmental disasters deriving from Angelini Beauty's activities.

Therefore, special clauses are inserted in each contract.

In particular, in the contracts signed between Angelini Beauty and suppliers from “at risk” countries, as defined by recognized organizations, contractual clauses are introduced, which require:

- a self-certification by the supplier concerning its compliance with specific social obligations (for example: measures which ensure workers the respect of their fundamental rights, the principle of equality of treatment and of non-discrimination, the prohibition of child labor, etc.);
- the possibility to inspect the production facilities or the operational offices of the supplying company, in order to verify that the above requirements are met.

9 PRINCIPLES OF CONDUCT IN RELATIONS WITH COLLABORATORS AND CONSULTANTS

All collaborators and consultants of Angelini Beauty must, when performing the contractual relationship established with Angelini Beauty or the task assigned by it, behave correctly, in good faith and in a loyal way, according to the applicable provisions of this code, the company regulations and the instructions and indications issued by Angelini Beauty staff.

9.1 Relationship establishment and development

For the establishment and the development of the relationship with collaborators and consultants, Angelini Beauty considers as an essential requirement their respect of the current legislation and of the principles contained in the Code when performing their professional services.

Angelini Beauty identifies and selects collaborators and consultants with absolute impartiality, autonomy and independence of judgment, without accepting any kind of pressure or compromise, aimed at providing third parties with favors or privileges or at obtaining favors or benefits.

When identifying and selecting collaborators and consultants, Angelini Beauty takes into consideration their professional expertise, reputation, independence, organizational skill and suitability to correctly and precisely perform their contractual obligations and duties.

9.2 Importance and knowledge of the Code

In each individual agreement, Angelini Beauty requires collaborators or consultants to respect the Code for the parts falling within their competence. Angelini Beauty also sends copies of the Code to collaborators and consultants, who must observe the principles contained therein.

The Company may consider behaviors contrary to the principles specified in the Code as a serious breach of the requirements of correctness and good faith when performing the contract, a breach of its relationship of trust and just cause for the termination of the contract.

9.3 Conduct in contractual relationships

When performing their professional services, collaborators and consultants must avoid any situation of conflict of interest with Angelini Beauty and, in case of conflict, must immediately report it to their company interlocutors and abstain from carrying out their services unless otherwise specified by the company.

Each collaborator or consultant must absolutely abstain from performing acts that are or are deemed to be illegal, even if these acts generate or could generate benefits for Angelini Beauty.

Each collaborator or consultant must safeguard the Angelini Beauty image and add value to it, also through behaviors constantly based on dignity, personal care, courtesy and respect for other people.

Collaborators and consultants must properly use and safeguard the integrity of the assets entrusted to them by Angelini Beauty.

10 PRINCIPLES OF CONDUCT IN INSTITUTIONAL RELATIONS

Angelini Beauty relationships with local, national or international institutions are based on maximum transparency and fairness.

All relations between Angelini Beauty and Italian and foreign public institutions are based on the principles of fairness, transparency, collaboration and non-interference, in compliance with their mutual roles.

Relations with representatives of public institutions are exclusively managed by the duly-authorized company functions, in full observance of the law and regulations, and may in no way compromise the integrity and reputation of Angelini Beauty.

For this purpose, Angelini Beauty shall not directly nor indirectly offer sums of money or other means of payment or other benefits to public officers or subjects performing public services for the purpose of influencing the way they perform their duties.

These requirements cannot be eluded by using different forms of contributions, disguised as sponsorships, appointments, consultancies, advertising, etc. and having the above forbidden aims.

11 PRINCIPLES OF CONDUCT WITH OTHER INTERLOCUTORS

11.1 Economic relationships with political parties, trade unions and associations

Angelini Beauty does not apply direct or indirect pressure on politicians or trade union representatives, through its managers, employees or collaborators.

In turn, Angelini Beauty directors, managers and employees may not perform any political activities during their working hours or use the company's assets or equipment for this purpose; they must also make clear that any political opinions they may express to third parties are strictly personal and do not represent the opinion and the orientation of the company.

In their relationships with other associations of stakeholders (e.g. trade associations, environmental organizations, etc.), no directors, employees or collaborators must promise or pay sums, promise or grant contributions in kind or other benefits on a personal basis for the purpose of promoting or supporting the interests of Angelini Beauty.

12 PRINCIPLES OF CONDUCT TOWARDS THE ENVIRONMENT

12.1 Environmental policy

Angelini Beauty's environmental policy is based on the belief that, as well as being a public asset to safeguard, the environment can be a competitive advantage in market that is becoming more and more global and attentive to the quality of life and corporate behavior.

13 METHOD AND IMPLEMENTATION OF THE CODE OF ETHICS

13.1 The Supervising Body as per art. 6 of Legislative Decree no. 231/2001

Angelini Beauty has established an autonomous and independent Supervising Body.

Angelini Beauty's Supervising Body is authorized to verify the application and the implementation of the Code.

The Supervising Body, if necessary, may report on its activities to the Board of Directors.

The Supervising Body has the following tasks:

- periodically verify the application and the compliance with the Code;
- implement activities for the distribution of the Code;
- propose modifications and additions to the Code to the Board of Directors;
- receive reports of breaches of the Code and investigate accordingly;

- draw up an annual report on the activities performed to be submitted to the Board of Directors.

When performing its activities, the Supervising Body is assisted by the necessary resources selected from Angelini Beauty staff on a case-by-case basis.

All Angelini Beauty employees and collaborators must cooperate with the Supervising Body, providing any company documentation necessary to perform its activities.

In case of doubt as to the legality of a certain action, its ethical value or its consistency with the Code, the recipient may contact the Supervising Body.

Reports of any illegal actions must be made in writing and may be sent to the person's direct superior or by post to the Supervising Body at Angelini Beauty S.p.A. – Organismo di Vigilanza– Viale Amelia 70 Roma.

Reports concerning breaches by the Supervising Body may be sent to the Board of Directors so that it appoints one of its members to perform the investigations deemed necessary and/or appropriate.

All reports received shall remain strictly confidential.

13.2 Dissemination of the Code of Ethics

The Supervising Body disseminates the Code to its recipients, as indicated below:

- delivery by e-mail and/or fax and/or post and/or *by hand* to employees and collaborators of Angelini Beauty (specifying that the Code is considered as binding for all employees) and to the members of the Board of Auditors who must sign a special declaration;
- publication on the company's website;
- posting in a location which is accessible to all employees and collaborators, pursuant to and for the purposes of art. 7, paragraph 1, of law 300/1970;
- communication to external collaborators and suppliers about the existence of the Code;

- verification that a clause has been inserted in the contracts signed by Angelini Beauty informing third parties of the existence of the Code

13.3 Effectiveness of the Code of Ethics and consequences of any breaches

It is mandatory for everyone to observe this Code and make sure it is observed by others.

The observance of the regulations contained in this Code is an essential part of the contractual obligations required to Angelini Beauty's employees, pursuant to article 2104 of the Italian civil code, as well as for the its collaborators.

Any breach of the above regulations shall be considered as a violation of the obligations deriving from the employment contract and/or a disciplinary offense, with all connected legal consequences, including regarding the continuation of the work contract.

Angelini Beauty strives to establish and deliver penalties coherently, impartially, uniformly and in proportion to the relevant breaches of the Code, in compliance with the provisions governing work relationships.

In particular, in case of breaches of the Code of Ethics by Angelini Beauty employees, the relevant provisions shall be adopted and the relevant penalties delivered in full compliance with art. 7 of law no. 300 dated 20th May 1970, of the current legislation and of the contents of the labor agreement.

Individual punishable breaches and the relevant penalties shall be established in a dedicated document which will be affixed in a location accessible to everyone, in compliance with the relative National Labor Contract.

This Code makes it mandatory to take disciplinary actions in case of non-observance of the rules of behavior established herein.