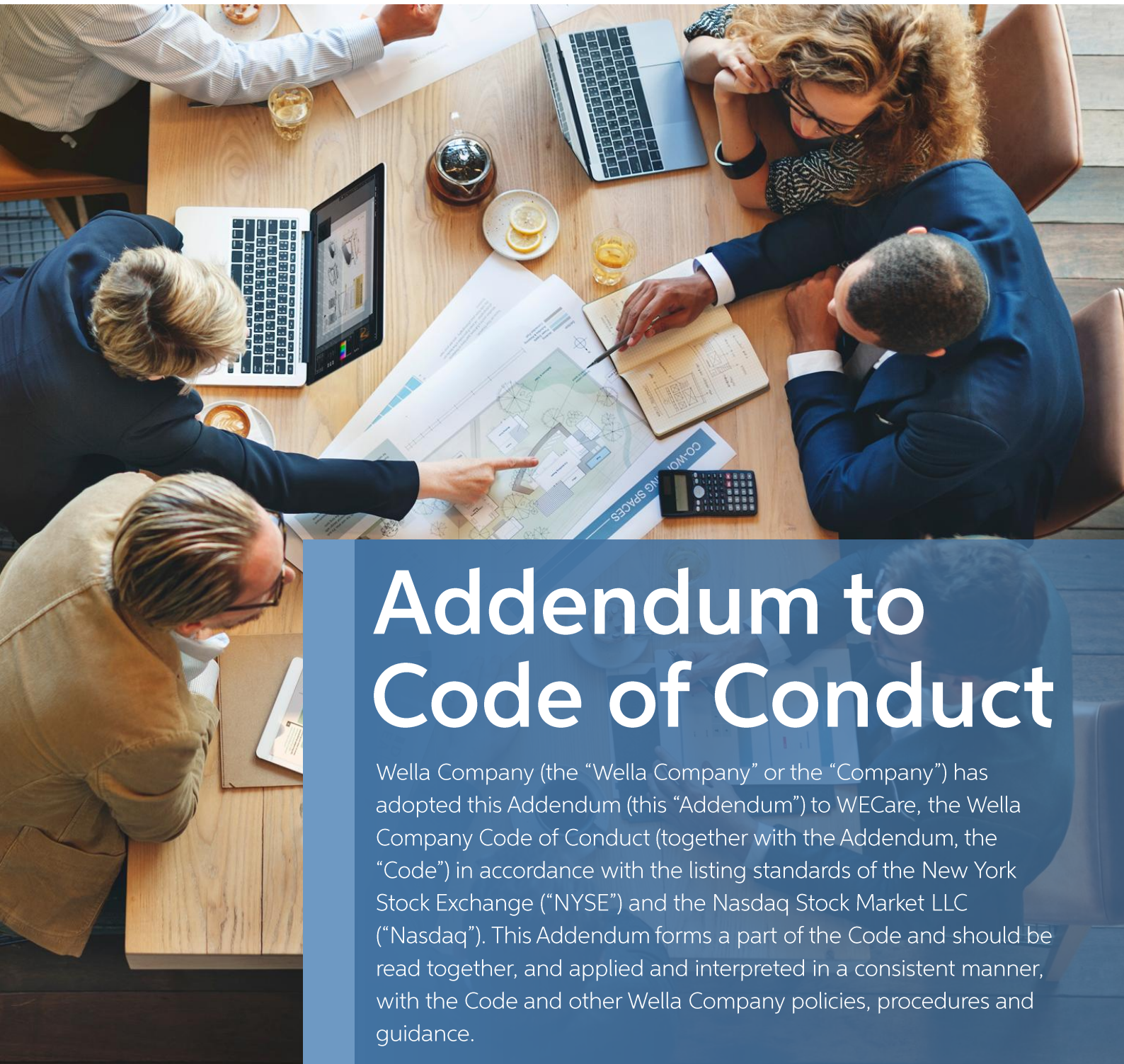




Addendum to Code of Conduct

Wella Company (the “Wella Company” or the “Company”) has adopted this Addendum (this “Addendum”) to WECare, the Wella Company Code of Conduct (together with the Addendum, the “Code”) in accordance with the listing standards of the New York Stock Exchange (“NYSE”) and the Nasdaq Stock Market LLC (“Nasdaq”). This Addendum forms a part of the Code and should be read together, and applied and interpreted in a consistent manner, with the Code and other Wella Company policies, procedures and guidance.

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1. Covered Parties

Our Code applies to all employees, officers, and members of the Board of Directors of Wella Company and any of its affiliates (each a “Covered Party” and, collectively, the “Covered Parties”).

Covered Parties are expected to act with honesty and integrity and to adhere to those principles and procedures set in this Code. In the case of the Company's non-management directors, compliance with the Code is subject to provisions of the Company's certificate of incorporation, bylaws and any stockholders agreement to which the Company is party.

2. Board and Committee Oversight of the Code

The Board of Directors, through its Audit Committee, oversees Wella Company's compliance and ethics program, including this Code, the effectiveness of the Company's reporting, escalation and enforcement processes, and significant compliance, legal, regulatory, and ethics risks attendant to violations of the Code.



3. Administration of the Code

The Chief Compliance Officer, together with the Company's Compliance function and in coordination with Legal, Internal Audit, HR, Finance, Information Security, and other control functions, has day-to-day responsibility for administration of the Company's compliance and ethics program and the Code.

Questions regarding interpretation and application of the Code should be directed to the Compliance function.

Senior leaders and managers are expected to reinforce the Code through their actions, decisions, communications, and supervision of their teams.

No one may improperly interfere with, obstruct, or retaliate against the Compliance function in the performance of its responsibilities.

4. Waivers, Amendments, and Disclosure

Any material amendment to, or waiver from, a provision of this Code applicable to a director or executive officer will be approved only by the Board of Directors or an authorized Board committee and handled in accordance with applicable laws, regulations, stock exchange requirements, and disclosure obligations.

Where required, Wella Company will disclose such waivers within the applicable time period and in the manner required by applicable law or listing standards.

5. Reporting, Investigations, Remediation and Accountability

Wella Company promotes ethical behavior at all times and encourages Covered Parties to talk to managers, the HR team and other appropriate personnel when in doubt about the best course of action in a particular situation.

Covered Parties are encouraged to promptly report any known or suspected violations of laws, rules, regulations or provisions of this Code in the manner set forth in this Code and in accordance with other Company policies.

Concerns reported in accordance with the procedures set forth in the Code may where appropriate be reviewed and investigated promptly, efficiently, and confidentially. No retaliatory action of any kind will be permitted against anyone making such a report in good faith, and the Audit Committee will strictly enforce this prohibition.

Where misconduct or control failures are identified, Wella Company may take one or more of the following actions, as appropriate:

- discipline responsible individuals;
- perform root-cause analysis;
- remediate control gaps;
- enhance training, supervision, or monitoring;
- update policies, procedures, or systems; and
- report matters to authorities where required or appropriate.

Violations of this Code may result in disciplinary action up to and including termination of employment or service, removal of duties, reduction or recoupment of compensation where permitted or required by law, and other remedial or legal action. Violations of this Code may also constitute violations of law and may result in criminal penalties and civil liabilities for the offending Covered Party and the Company. All Covered Parties are expected to cooperate in internal investigations of misconduct.

6. External Reporting to Governmental Entities

Nothing in the Code or any Wella Company policy or agreement prevents or restricts, or is intended to prevent or restrict, any Covered Party from reporting concerns directly to the SEC, the U.S. Department of Justice, or any other government agency, or making disclosures, including providing documents or other information to a governmental entity that are protected under the whistleblower provisions of any applicable law or regulation.

Covered Parties do not need permission from Wella Company, and Covered Parties do not need to tell the Company that you have done so. Moreover, nothing in this Code or any Wella Company policy or agreement restricts, or is intended to prevent or restrict, you from receiving an award for providing information pursuant to the whistleblower provisions of any applicable law or regulation to the SEC or any other government agency.



7. Corporate Opportunities

Covered Parties are prohibited from

- (1) taking for themselves opportunities that are discovered through the use of Company property, information or position without the prior consent of the Board of Directors,**
- (2) using Company property, information or position for improper personal gain and**
- (3) competing with the Company directly or indirectly. Covered Parties owe a duty to the Company to advance its legitimate interests whenever possible.**

8. Compliance Culture

Wella Company expects all employees, officers, and directors to comply with this Code and to support a culture of integrity, transparency, and accountability.

Compliance and ethical conduct may be considered in performance management, leadership assessments, promotion decisions, compensation decisions, and other recognition or consequence processes, as permitted by law and Company policy. Managers are expected to address misconduct consistently, and avoid creating incentives that encourage excessive risk-taking or unethical conduct.

Everyone at Wella Company shares responsibility for protecting the Company's integrity, reputation, and long-term value. When in doubt, employees should seek guidance from Compliance, Legal, HR, Internal Audit, Finance, Information Security, or another appropriate Company resource before acting.

