



External Business Partner

# WECare

CODE OF CONDUCT



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PROFESSIONAL



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# What External Business Partner Code of Conduct is about

## Our CUSTOMERS AND BUSINESS PARTNERS

1. Health, safety and security
2. Equality and fair treatment
3. Fair competition
4. Personal data and privacy
5. Anti-bribery and corruption
6. Prevention of money laundering
7. Gifts and entertainment
8. Conflicts of interest
9. Trade controls and sanctions



## Our COMMUNITIES

1. Human rights and modern slavery
2. Protection of the environment
3. Charitable donations
4. Political contributions and activities



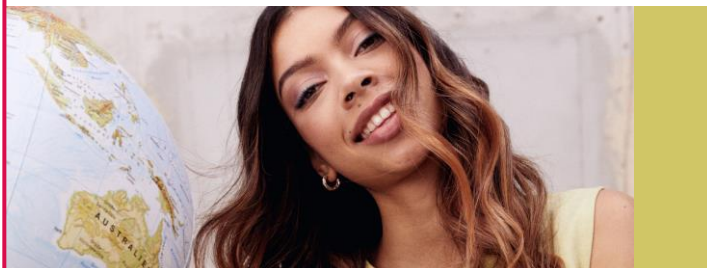
## Our CODE

1. A message from our Chief Executive Officer
2. Our Code of Conduct
3. Our commitment to ESG
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## Our CONSUMERS AND PRODUCTS

1. Advertising and packaging
2. Responsible innovation



## Our SHAREHOLDERS

1. Accuracy of data and records
2. Cyber security
3. Company assets
4. Communicating externally
5. Insider trading

# 1. A message from WELLA Company Chief Executive Officer

Dear Colleagues,

You, Wella External Business Partners are vital to Wella Company's continued success.

Together, we are the caretakers of our company reputation, upheld by ethics and compliance. How we treat others and manage our challenges will define how the world views us. We must get these things right. In a fast changing, highly regulated world, our Code will align us and guide us every day.

Our new Wella Company Code of Conduct has been designed to meet the needs of our new company and presents an External Business Partners framework to uphold that responsibility.

In our company, from time to time, things may go off course. It is important that we all have the courage to speak up when something doesn't seem right. We have a hotline designed to help everyone. Please find details below. As we move forward, the Code will help ensure that our values continue to be reflected in every business activity. A commitment to integrity, acting honestly and ethically, and complying with the law are critical to our continued mutual success.

Thank you

Annie

Annie Yang Scrivner



## 2. Our Code of Conduct

This External Business Partners Code of Conduct sets out the standards of behavior expected from each of us and guides us on how to do the right thing when we face challenges.

The Wella Responsible Sourcing Strategy describes who we partner with, what we buy and how we will grow sustainably.

Above and beyond this Code of Conduct we expect our External Business Partners to comply with all applicable laws.

# Our CODE

## 3. Our commitment to Environmental, Social, and Governance (ESG)

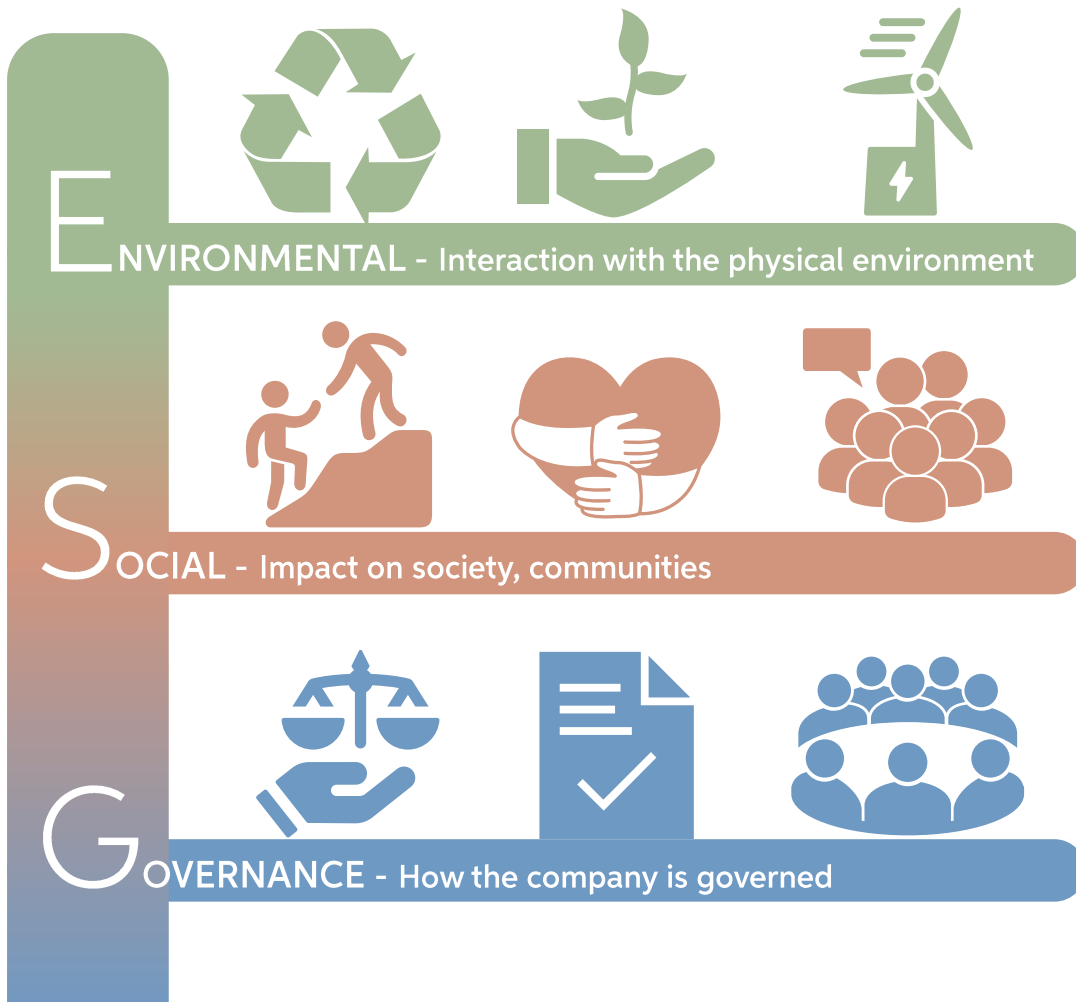
Our Code Responsible Sourcing Strategy is a key part of our governance and describes how we work together to manage ethically the way we run our business.

We are building ESG into the fabric of our company. We have dedicated goals and targets to become more diverse, inclusive and equitable. We expect you, our External Business Partners to be doing the same.

We believe businesses play a critical role in shaping, influencing and enabling people, organizations and societies to thrive. We seek to be part of the work to help solve the social, environmental and governance challenges the world faces. We are elevating our work on sustainability and our ESG journey because it is vital to how we embed our commitment to People, Planet and Products into the core of our businesses.

We strive to operate at the highest levels of human rights and business ethics in our organization, with our External Business Partners across our value chain.

As a member of the UN Global Compact, we support the UN's Sustainable Development Goals and abide by them as a guiding philosophy, within the 4 walls of our factories and with our External Business Partners. We aim to reduce our waste and packaging, and to reduce, reuse and recycle throughout our business and product lifecycle.





## Our CODE

### 4. Why do we care

Our Code guides how we act with integrity in everything we do. It defines how we act and react when faced with challenges and together with our Responsible Sourcing Strategy sets out how we will behave in our daily work.

The laws and regulations binding our business are growing fast and becoming more complicated. It is not always easy to understand how to work within these laws and regulations on a daily basis.

Our Code shows you what you need to do to comply with the laws and regulations which apply to your work, regardless of where you are in our Wella External Business Partners across the globe. The Code helps us to make the right choices.



### 5. Our Code and the law

We operate in many countries with different laws and regulations. Sometimes a law in one country may set a stricter standard than our Code. In those circumstances, should you follow the stricter standard set out by that law.

This Code replaces all previous versions of the Code of Conduct for Business Partners. The Code will be reviewed periodically to ensure that it remains accurate.



### 6. External Business Partners 's responsibilities

All Wella Company External Business Partners are responsible for the following:

- o Reading, understanding, and following our Code, Responsible Sourcing Strategy company policies and procedures.
- o Confirm that they will comply with this code or their own company code which is equivalent in all legal elements.
- o Promptly raising concerns when you become aware of violations of laws or our Code.
- o Cooperating fully when responding to an investigation or audit.

## 7. Where to get help

At Wella Company we speak up if we see possible illegal or unethical behavior, including potential or actual breaches of our Code and we ask our External Business Partners to do the same.

If you have a concern, you should always try to raise it with your manager if that is possible. You can also talk to a member of the HR team.

Any concern you raise will be managed confidentially to the extent possible by the law.



The hotline is available to all employees, customers, External Business Partners and any other party who wishes to raise a concern.

### Hotline

If you believe there are reasons you cannot raise a concern with your Wella Business partner or your concern has not been resolved, you may contact the Wella Company Compliance team either in person or via E-mail at [wella.compliance@wella.com](mailto:wella.compliance@wella.com)

You can ask a question or report a concern through the hotline either using a web form or the telephone. The hotline is available 24/7 and local numbers are available in every country where Wella operates. The hotline is also available in all languages where Wella operates, through a translation service.

You can raise concerns anonymously (where allowed by local law). All concerns are investigated promptly, efficiently, and confidentially, to the extent possible by law.

The Wella Hotline is operated on behalf of Wella Company by an independent third party,.



**Online:**  
[www.wellacompany.com/supplier](http://www.wellacompany.com/supplier)



**Email:**  
[wella.compliance@wella.com](mailto:wella.compliance@wella.com)



**Phone:**  
The Wella Ethics and Compliance Hotline: Check the WeCare Hub for local numbers; or dial +1-720-514-4400 and select your language.



# Our CUSTOMERS AND BUSINESS PARTNERS

We work with our External Business Partners in an honest, respectful and responsible way and we expect them to treat us in the same way. Our External Business Partners are essential to our ability to do business and meet our stakeholders' expectations. That is why we choose to work with others who share our commitments to ethics and compliance.

We are a company on which others can rely. Wella Company gains its competitive advantages through strong performance. We are committed to working with integrity, within the laws and regulations of all the countries in which we operate and in accordance with recognized international standards.

Wella Company has a broad range of External Business Partners which includes suppliers, consultants, agents, retailers, distributors, salons, drugstores, stylists, and influencers.

1. Health, Safety and Security
2. Equality and fair treatment
3. Fair competition
4. Personal data and privacy
5. Anti-bribery and corruption
6. Prevention of money laundering
7. Gifts and entertainment
8. Conflicts of interest
9. Trade controls and sanctions



## 1. Health, safety and security

Good safety is good business. We ask our External Business Partners to commit as we do for our sites to creating and maintaining a healthy, safe and productive work environment in which all employees establish a healthy life-work balance and can perform to the best of their ability.

To follow all health and safety laws and regulations that apply to the workplace and aim to continuously enhance health and safety performance.

A safe and secure work environment also means a workplace free from alcohol and substance abuse. **External Business Partners should not tolerate anyone being under the influence of alcohol, illegal drugs or the abuse of prescribed drugs in the workplace.**

**Wella Company has a zero-tolerance policy for workplace violence.** We and our External Business Partners should maintain a workplace where employees can work without feeling threatened or unsafe, to prohibit weapons on all of the Company's properties consistent with local law. If you have concerns that someone may have a weapon, report it immediately .

We expect those we work with, including suppliers, customers, agents, and contractors, to respect and observe our standards on health and safety.

### Speak up if you see...

...any unsafe acts, avoidance of safety procedures, or other security concerns. Immediately report it to your line manager, or to the Wella Hotline.



### ALWAYS

- o Maintain a safe and healthy working environment.
- o Know and follow all safety laws, regulations, policies and procedures.
- o Report immediately any unsafe behavior, conditions, or equipment as well as any accidents, including minor ones.
- o Ensure that those we work with comply with applicable health and safety requirements.

### NEVER

- o Put profits before safety.
- o Take shortcuts with safety procedures.
- o Ignore safety rules and regulations at workplace.
- o Work in unsafe conditions or use unsafe equipment.
- o Continue working if you consider it unsafe.

## 2. Equality and fair treatment

We treat everyone with fairness, respect and dignity. We are committed to providing equal opportunities to all employees and ask our External Business Partners to do the same.

To create a diverse, equitable and inclusive environment where the value of different perspectives and cultures is respected and celebrated. We believe a diverse workforce is essential to a thriving innovative business.

**External Business Partners should not tolerate any discrimination**, on the grounds of race, color, national origin, gender or gender identity, disability, marital status or family situation, sexual orientation, age, political and philosophical opinions, religious beliefs, or union activity or any other forbidden discriminatory criteria.

This prohibition applies not only to recruitment, but also to promotion, continued employment and working conditions, as well as relationships with third parties.

**We do not tolerate any form of abuse, bullying or harassment**, including sexual harassment, and expect those who work with us to share this commitment.

### Speak up if you see...

...anyone being harassed or discriminated against.



### ALWAYS

- o Support and promote an inclusive work environment.
- o Be respectful of cultural differences.
- o Consider the impact of your words and actions on others.

### NEVER

- o Ignore any form of harassment, abuse and disrespect at work.
- o Discriminate, harass or bully people around you.
- o Behave in a way that could be offensive, intimidating, malicious or insulting.



### 3. Fair competition

**We compete fairly and vigorously and will not engage in any activity which is anti-competitive.**


We deal with our customers, competitors and External Business Partners in a fair and ethical way. We seek to facilitate fair and open competition between companies, and to encourage innovation, increased quality and competitive prices. We want our customers and consumers to benefit from fair competition.

Agreements or communications with competitors which lead to sharing markets, fixing prices, limiting production or collusive tendering (bid rigging) are prohibited by law and we and our External Business Partners should not engage in these activities.

Competition and antitrust laws are complex and often fact specific and can differ depending on the region or market you are working in. For this reason, if you have any questions or doubts consult with your Legal team.

**Speak up if you see...**

...any type of agreement between Wella Company and any of its competitors covering prices, bids or markets.



**ALWAYS**

- Avoid contact with competitors that create the appearance of improper agreements.
- Ensure a Trade Association meeting you are attending has a predetermined agenda which does not cover sensitive topics such as prices, bids or markets.
- Obtain information about our competitors in a fair manner.
- Consult with your Legal team if you have any doubts.

**NEVER**

- Make agreements with our competitors about bids, prices or sharing/dividing markets.
- Force a distributor or customer to charge a specific price for products.
- Share commercially sensitive information with competitors or any other third parties.
- Allow conversations at a trade association meeting to cover prices, bids or markets.

### 4. Personal data and privacy


**We respect and protect the privacy and confidentiality of our consumers, customers and External Business Partners and expect our External Business Partners to do the same..**

We only collect and use personal data that we need for the effective operation of Wella Company or for compliance with the law. We are transparent about how we handle our customer's and business partners' data. We want them to trust us to protect their privacy and use their data in the ways that they permit us. We ensure that it is properly secured and can be accessed only by authorized personnel.

If we share personal data with External Business Partners to provide services to us, this must be contractually committed to protect it in accordance with applicable confidentiality and data privacy laws.

**Speak up if you see...**

...anyone violating data privacy rules or if you suspect a data breach.



**ALWAYS**

- Make sure we inform External Business Partners about the type of information we are collecting, how we plan to use it and how they can contact us if they have any questions.
- Collect and store only the minimum amount of personal data needed and only use it for the purposes stated.
- Correct or delete any personal data that is accurate or out of date.
- Keep business data secure and restrict access on a strict "need to know" basis.

**NEVER**

- Keep personal data longer than necessary.
- Provide business information to anyone outside of Wella Company without proper authorization.
- Collect "sensitive" information without the consent of the person concerned unless the law requires it.



## 5. Anti-bribery and corruption

**We do not tolerate bribery and corruption in any of its forms in our business and expect our External Business Partners to do the same.**

We also take particular care when offering or receiving gifts or hospitality as governments and companies have strict rules and regulations, which if broken, could constitute bribery. Even if you do not intend to bribe someone, ultimately what matters is whether someone can perceive your actions to be improper.

We require that our External Business Partners and customers share our commitment to eliminate bribery and corruption. Wella Company is a signatory of the UN Global Compact, and in particular, the 10th principle on anti-corruption.

Speak up if you see...

...any gifts or entertainment to government officials.



**ALWAYS**

- o Keep accurate books and records so that payments are honestly described, and your company or Wella Company funds are not used for unlawful purposes.
- o Know who you are doing business with by following due diligence procedures.

**NEVER**

- o Offer or accept bribes, kickbacks or any other kind of improper payment.
- o Use a third party to offer, give or promise anything of value that is prohibited by law or the Wella Company rules.

## 6. Prevention of money laundering

**We and our External Business Partners are committed to the prevention and detection of money laundering in all its forms.**

We protect Wella Company's products and services from being used for the purposes of money laundering and terrorist financing. We and our External Business Partners will always seek to evaluate businesses we want to work with by following appropriate due diligence procedures and ensuring that business partners, customers, merger/acquisition partners and other third parties are screened appropriately.

Speak up if you see...

...any suspicious circumstances or situations (also called red flags).

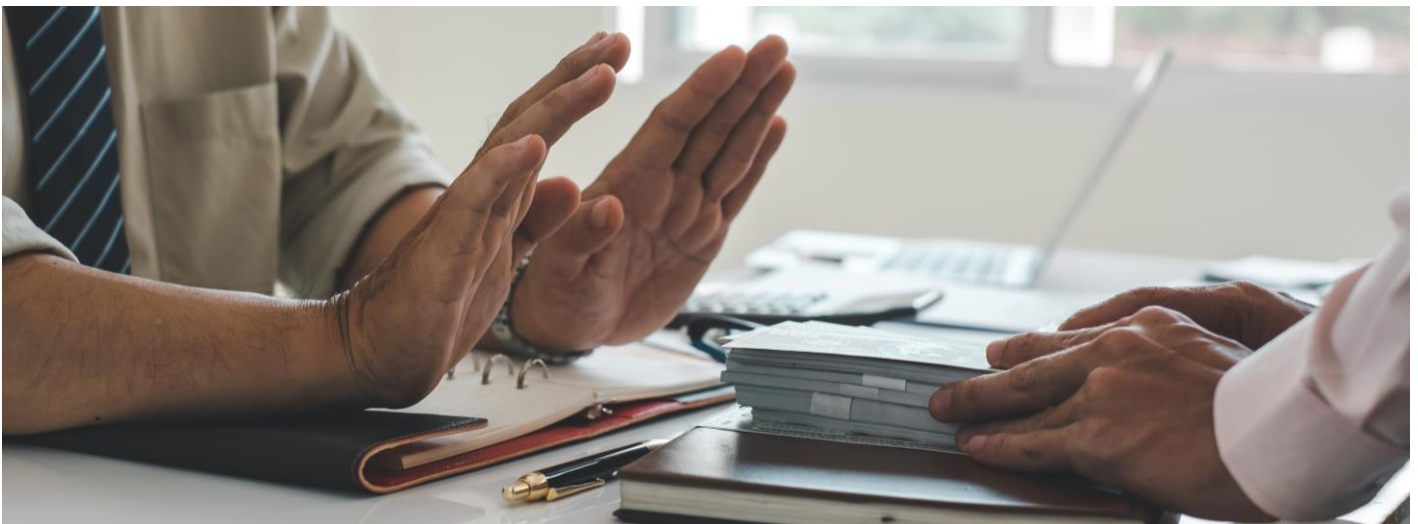


**ALWAYS**

- o Consult with Procurement or a lawyer if you have suspicions.
- o Fulfill the due diligence processes requirements of Wella Company or your company equivalent.
- o Comply with laws.

**NEVER**

- o Ignore suspicious circumstances or situations (also called red flags).



# 7. Gifts and entertainment

**We do not give or receive gifts or entertainment in return for any business, services, or to influence a decision in our favor.**

We recognize that the exchange of appropriate gifts and entertainment can be part of building healthy business relationships.

You should not receive more than one gift or entertainment from/to the same third party and if the total amount given/received can create the appearance of influence. Also you should not give or receive a gift close to the award of any business or contract.

Wella employees and External Business Partners should disclose your gifts and entertainment to their line manager also where relevant to Compliance using the compliance mailbox at [wella.compliance@wella.com](mailto:wella.compliance@wella.com).

External Business Partners should operate in line with their company rules and limits and ultimately in a manner which will not expose Wella Company to risk.

If there is a conflict between Wella Company's gifts and entertainment requirements and applicable External Business Partners or Legal gifts and entertainment requirements, follow the strictest requirement.

Some gifts and entertainment are never acceptable as they may be illegal or could damage our reputation; for example, anything that could be seen as a bribe or that is indecent or improper.

We do not provide directly or indirectly gifts or entertainment to government officials.

Speak up if you see...

...anyone giving or receiving valuable gifts worth more than €\$200.



### ALWAYS

- o Follow the Guidance on gifts and entertainment.
- o Be open and clear with your line manager.
- o Consult with Compliance if you have any doubts.

### NEVER

- o Give a gift to a government official.
- o Hide or undervalue gifts or entertainment activity.
- o Expect anything in return for a gift you have given.
- o Ask for a gift or entertainment.
- o Split expenses to hide or state less than the full cost of a given gift or entertainment.

*when appropriate, you can give or receive gifts and entertainment as set out below. Further guidance is available if needed – check the Code hub.*



## 8. Conflicts of interest

**We proactively disclose and manage actual and potential conflicts to ensure that we protect the reputation of Wella Company.**

We will never use our position, influence or company information, assets or resources in any way that improperly benefits ourselves or others. A conflict of interest may occur when your interests or activities affect your ability to make objective decisions for Wella Company.

The majority of conflicts, if disclosed and managed proactively, will not affect your work for Wella Company. It is important that we identify and disclose conflicts when we encounter them so as to protect the reputation of Wella Company.

Disclose situations that might create a conflict or even the appearance of a conflict of interest. Once disclosed, we then have the opportunity to better manage it.

Be aware of the many different ways in which conflicts of interest can occur. If in doubt get help from your line manager.

Speak up if you see...

... a conflict which has not been disclosed and managed.



ALWAYS

- o Disclose conflicts and potential conflicts to your Wella Business Partner..
- o Check with Wella Business Partners if you have any doubt about whether you have a conflict of interest.

NEVER

- o Hide a conflict of interest – this will affect your reputation and that of Wella Company and may result in appropriate measures being taken
- o Use Wella Company equipment, time, resources or information for another job or business.



## 9. Trade controls and sanctions

**We respect and observe the trade laws of all countries in which we operate including economic sanctions, import and export control laws.**

Trade sanctions, including financial sanctions, are complex restrictive measures that can be put in place to fulfil a range of purposes. These purposes include complying with international obligations, supporting foreign policy and national security objectives, as well as maintaining international peace and security, and preventing terrorism. If you are involved in transactions, such as business dealings with a sanctioned country, entity, and/or person you must ensure compliance with applicable laws.

Export controls are country-based and are typically implemented with national security and foreign policy considerations in mind. For example, implements of torture or dual-use goods such as munitions are generally controlled for export to any country, while some exports, encryption items, for example, may only be controlled to terrorist regimes and globally embargoed nations.

Import controls are designed to protect the safety of citizens or a national economy, such as restrictions on the importation of harmful chemicals or toys with parts that pose a choking hazard to children. Economic import controls are often used to prevent widespread market penetration of foreign commodities when domestic production is vital to a country's economy.

Wella Company and our External Business Partners should always know who we are doing business with by following appropriate due diligence procedures and ensuring that business partners, customers, merger/acquisition partners and other third parties are screened for concerns, such as global sanctions, restricted jurisdictions and trade control lists.

If you need to provide, import or export products or services or materials, including equipment, software, and technology, these must be classified in advance, and all required labelling, documentation, licenses and approvals completed.

### Speak up if you see...

...any contract with a sanctioned party, individual or export-controlled materials.

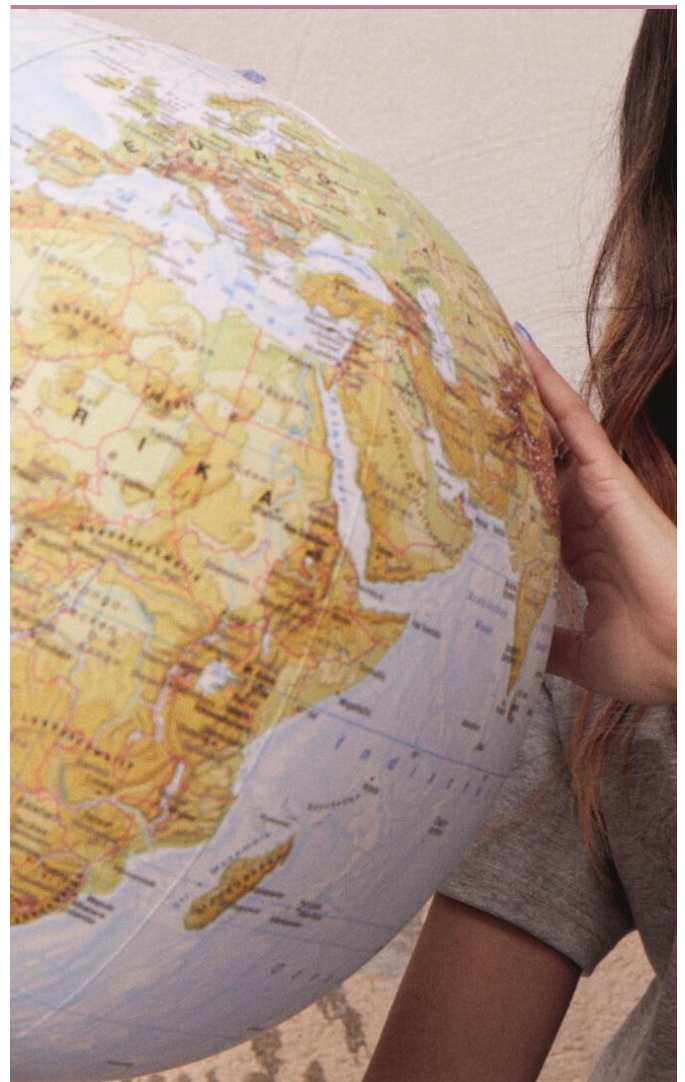


### ALWAYS

- o Make sure you are aware of any sanctioned countries, parties or individuals which might be touched by your business.
- o Ensure that your products, services or materials have been classified correctly under export and import laws
- o Get advice from a lawyer if you have any doubts about sanctions.

### NEVER

- o Do business directly or indirectly in a sanctioned territory or with a sanctioned party.
- o Try to circumvent the applicable sanctions and trade restrictions by using third parties.
- o Ignore suspicious circumstances or situations (also called red flags).







# Our CONSUMERS AND PRODUCTS

Our consumers and customers are our reason for being and the lifeblood of our business. We want to create innovative hair and nail products that enable people to look, feel and be their true selves.

We want to be responsive to the needs of our consumers and continually seek new ways to delight them.

1. Advertising and packaging
2. Responsible innovation

# 1. Advertising and packaging

**We market and sell our products and services responsibly and in compliance with laws and regulations in the markets we operate in.**

Together with our External Business Partners we seek to be responsible in the way we promote our products and services. We are sensitive to the diversity of our consumers, communicate with good taste and quality, and never promote a single or unrealistic standard of beauty.

We ensure that all advertising, packaging, and promotional materials are fact-based, not misleading, and transparent. We include sufficient information about our products, their ingredients or constituent parts, and appropriate guidance on their operation or application so that consumers can make informed choices about their purchase, use and where they can seek additional help.

- ALWAYS**
- o Work with teams to design accurate description of our products, their effects and benefits where delegated by Wella Company.
  - o Design sales and marketing materials so that they are clear and easily understood.

- NEVER**
- o Advertise in any media or publication in a way which would cause offence to anyone.
  - o Target advertising to children.
  - o Send direct marketing materials to individuals who have not agreed to receive them.



# 2. Responsible innovation

**Working internally as well as with External Business Partners, we seek to innovate in a way that does not do harm to the environment and to the communities and markets we operate in.**

We aim to innovate new and existing products which help individuals to look, feel, and be their true selves. We are responsible when developing new and existing products and services. We ensure that the constituent parts of our products and services come from ethical sources and are created and produced using responsible processes and methods by people who are treated fairly and with dignity.

When our products have reached their end of life, we ensure that they can be recycled or repurposed if possible or disposed of safely and appropriately if not.

We do not test products on animals unless specifically required by local laws and regulations and are committed to ending animal testing across the beauty industry.

**Speak up if you see...**

... products or services that have been created with an origin or background that may cause harm to the environment, our customers and the communities and markets in which we operate.



- ALWAYS**
- o Comply with ethical, social and regulatory requirements when developing new products or services.
  - o Ensure appropriate specifications and documentation for the raw materials and constituent components for our products, their authenticity and their origin.
  - o Maintain appropriate records for all research and studies related to any new product development.

- NEVER**
- o Conduct testing on animals unless it is a specific requirement by a government or regulatory authority.
  - o Commence development or knowingly introduce a product or service that will have a negative impact on the environment markets or communities in which we operate.







# Our COMMUNITIES

We respect and support the communities in which we operate and ensure we make a positive contribution to society and the environment.

We respect human rights and expect our customers and External Business Partners to share this commitment. We are mindful of external impact on the environment and do our best to minimize any adverse effects of our activities.

We are committed to working responsibly with governments and politicians. We encourage appropriate charitable activities.

1. Human rights and modern slavery
2. Protection of the environment
3. Charitable donations
4. Political contributions and activities

# 1. Human rights and Modern Slavery

**We are committed to respecting, upholding, and advancing human rights and ethical labor standards. We will not tolerate human trafficking, slavery, forced labor or child labor and we expect all our External Business Partners to commit to operating with these standards.**

We will not tolerate discrimination in any form, by anyone from Wella Company or our External Business Partners and businesses, against any person or groups of people.

We support the International Labor Organization (ILO) declaration on the Fundamental Principles and Rights at Work. We do not use and will not work with anyone who uses forced, compulsory, trafficked or child labor. We will ensure that we do not contribute to any activity that violates labor rights and will take appropriate measures if we discover that someone we work with violates these rights.

Wella Company is a participant of and supports the UN Global Compact and in particular principles 1 and 2 on human rights. These state that businesses should support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses.

## Speak up if you see...

... Your business using slavery, forced or child labor.



### ALWAYS

- o Follow laws and regulations relating to human rights.
- o Treat people equally and with dignity and respect and without discrimination.

### NEVER

- o Ignore violation of labor rights within your Company or by anyone you work with.
- o Work with third parties who violate human rights.

# 2. Protection of the environment

**We believe it is right to measure our performance not only on the profit we generate but also on our environmental and social impact.**

We comply with applicable environmental laws and regulations as a minimum and strive to exceed their requirements. We aspire to help our hair and nail professionals and our consumers be more sustainable, both by using our products and through the examples we set every day in our work.

We take a proactive approach to the management of our environmental responsibilities. We work systematically to prevent, minimize, and remedy adverse environmental effects from our operations, products, and services. We implement programs to improve our water and energy efficiency and reduce our carbon intensity and the waste produced from our activities.

We ask our External Business Partners to conduct their businesses in the same way, both in their dealings with Wella Company and their other customers as well.

## Speak up if you see...

...any activity within Wella Company or by one of our External Business Partners that carries a significant risk of environmental harm.



### ALWAYS

- o Consider how our behavior and activities in all our work impacts the environment with a view to reducing these impacts wherever possible.
- o When considering a new project or product, always look at not only the financial and marketing angles, but also the environmental impact.
- o Favor the use of renewable or sustainable materials and services in our day-to-day work and manufacturing.

### NEVER

- o Undertake a new project without first understanding whether there are any environmental laws or regulations that govern how it must be carried out.





### 3. Charitable donations

**We want to create positive change in the communities and environments in which we operate.**

We seek to support charitable and other non-commercial organizations undertaking philanthropic activities or championing other positive community civic, health and well-being outcomes. We seek to make charitable contributions or donations to those organizations whose goals are consistent with the Wella Company Values and our Environmental, Social, and Governance (ESG) aspirations.

ALWAYS

- o Where you work with Wella Company on these activities, ensure that donations made by Wella Company are legal and ethical.

NEVER

- o Engage Wella Company with organizations that do not reflect our Values.
- o Oblige other business partners to donate or make contributions to projects supported by Wella Company.
- o Make donations in the name of Wella Company.

### 4. Political contributions and activities

**We do not support any political party, organization, committee or individual engaged in politics.**

We deal transparently and responsibly with governments, politicians, public officials and international organizations.

If we take part in the public decision-making process or engage on legislative issues on matters that affect our business, we do this in an impartial, transparent and responsible manner and in compliance with appropriate laws and regulations.

Where employees of Wella Company or our External Business Partners voluntarily contribute their personal time and money to support political parties, candidates or campaigns. Such support is personal and is not related to Wella Company.

Speak up if you see...

...anyone making political contributions on behalf of Wella Company.



ALWAYS

- o Keep your employee's political activities separate from your work for and with Wella Company.

NEVER

- o Engage with politicians or regulators.
- o Use Wella Company funds or resources to support any political party or candidate.





# Our SHAREHOLDERS

We are committed to protecting our reputation and shareholder value by responsibly managing our systems, assets and information and by ensuring that our records are clear, accurate and complete.

We conduct our business in accordance with law, regulations, and internationally accepted standards of good corporate governance.

We maintain and continue to build trust by communicating clearly and transparently with external stakeholders to enhance and protect our reputation and the value of our brands.

1. Accuracy of data and records
2. Cyber security
3. Company assets
4. Communicating externally
5. Insider trading



## 1. Accuracy of data and records

**We seek to maintain the trust and confidence we have built with our shareholders, customers and consumers by providing timely, regular, and reliable information on our activities, financial position and performance.**

We follow all legal, accounting and company requirements for reporting financial information in the jurisdictions in which we operate. We appropriately reflect our business transactions in our books and records for each accounting period in a fair, complete, accurate, timely, and understandable way.

We are honest about our operations, performance and forecasts with our colleagues, shareholders, and other stakeholders.

We expect our External Business Partners to uphold the above standards as it relates to their core business and business relationship with Wella Company.

Speak up if you see...

...any misrepresentation of business or financial information.



**ALWAYS**

- o Follow applicable laws, standards, and regulations for accounting and financial reporting.
- o Authorize, record and report all transactions accurately, completely, and promptly.
- o Ensure that transactions are legitimate and based on valid documentation.
- o Where appropriate fully cooperate with Wella Company with external and internal auditors.

**NEVER**

- o Falsify accounting records or documents or ask anyone else to do so.
- o Make false, misleading, or incomplete statements to an independent accountant or an auditor or try to influence them.
- o Sell or transfer Wella Company products or assets without proper authorization and documentation.
- o Use or accept cash if other payment methods are available.

## 2. Cyber security

**We are vigilant about cyber security risks and will protect our IT systems. We take care when we use Wella Company systems because our business relies heavily on effective and fully functioning information and systems, which are under constant attack from outside the company.**

External Business Partners should not:

- o Share Wella Company system & phone details.
- o Leave computing devices and mobile phones, unlocked and unattended.
- o Access Wella Company business confidential information.

Wella IT Security checks, monitors and sometimes blocks emails and internet traffic as well as documents entering and leaving the company.

Speak up if you see...

...suspicious emails from unknown sources requesting you to follow unknown links.



**ALWAYS**

- o Apply same or equivalent standards to protect your company passwords and follow prompts to change them.
- o Safeguard your laptop, especially when you are using it outside of offices.
- o Avoid using external or USB drives.

**NEVER**

- o Share your company passwords.
- o Follow links or open attachments in emails which you are suspicious about.



### 3. Company assets

**Wella Company assets provide the foundation for our growth and success. We protect our assets, information and intellectual property and in doing so protect both ourselves and our shareholders.**

External Business Partners should protect Wella Company assets, money, intellectual property and information as if they were their own.

External Business Partner should not use these assets or information for our own personal interest or gain, or in conflict with the goals and values of Wella Company. When making purchases on behalf of Wella Company we always follow the Responsible Sourcing Strategy and Wella Company policies.

We will not tolerate any fraud. We seek to prevent and where appropriate to detect fraud to protect Wella Company assets. Everyone must speak up if they see or suspect fraud against Wella Company. We will, where appropriate, report fraud to the appropriate government authorities.

We protect and maintain Wella Company intellectual property to maintain our competitive edge. We safeguard our intellectual property assets and prevent their misuse by others. We respect the intellectual property of others and prohibit Wella Company unauthorized use, theft or misappropriation of a competitor's or third-party's intellectual property by any employee.

We manage and protect confidential information in line with information classification guidelines and policies. We take care not to disclose information confidential to Wella Company or our employees to unauthorized third-parties or those without a genuine business need.

ALWAYS

- o Use company assets and money in line with the appropriate policies.
- o Alert the Legal team if you suspect any Wella Company products have been counterfeited.

NEVER

- o Use Wella company corporate assets, information, intellectual property or money for personal gain or inappropriate purposes, or remove them from company premises without authorization.

#### Speak up if you see...



...data storage devices or sensitive documents left unattended in non-secure locations.

...employee providing Wella Company information or discussing sensitive information or topics with people or organizations outside Wella Company.



## 4. Communicating externally

**We expect External Business Partners when requested by Wella Company, to communicate carefully, clearly and honestly with our customers, other business partners and investors, and with the public in general.**

Only speak on behalf of Wella Company if you have approval and we authorized to do so. Do not speak on behalf of Wella Company or provide commentary or information on company strategy, performance, innovation pipeline or other confidential, proprietary or sensitive topics to external audiences.

As our External Business Partners we expect you to be polite, professional and respectful when you use traditional or social media. The way you use media may influence how others view your company as well as Wella Company.

We expect our External Business Partners to co-operate with government agencies and other regulatory bodies in the performance of their functions, inquiries, and investigations, and do so in full compliance with applicable laws. Any information or disclosures provided as part of this must be truthful and complete.

### Speak up if you see...

...employee acting in way that conflicts with our Values on social media, and particularly if they appear to be representing or speaking on behalf of Wella Company.



### ALWAYS

- Refer any requests for comment from media or external parties with relation to your business with Wella to Wella Company representatives.
- If you see negative or questionable communications on any traditional or social media channels that would potentially denigrate or negatively impact Wella Company's reputation, please contact Wella Company.
- Notify Wella Company representative immediately if you are asked to provide information to a government agency or regulator.
- Seek legal advice if you are contacted by a government agency, regulator, or other third party in relation to an investigation or litigation.

### NEVER

- Create the impression that you are speaking to third parties as a representative of Wella Company unless it is approved by Wella Company.
- Speak about confidential, proprietary or sensitive topics or non-public information with people or organizations outside Wella Company.

## 5. Insider trading

**We never use inside information to trade or encourage others to trade in securities of any company including our owners, customers, External Business Partners, both current and prospective.**

Where we have access to unpublished, price or sensitive information about any company we do not use it for our own or another's benefit.

Using insider information for your gain or giving it to unauthorized third parties is a criminal offence in many countries which may lead to fines and imprisonment for the individual(s) involved.

### Speak up if you see...

...an employee using or encouraging anyone to buy and sell securities using information that is not publicly available.



### ALWAYS

- Consult with a lawyer if you have any doubts.

### NEVER

- Never use inside information to buy or sell any securities.
- Trade indirectly while using inside information, for example through family members or others, or by providing 'tips.'
- Never spread information to manipulate the price of listed securities.





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OUR CODE OF CONDUCT