



# WECare

OUR CODE OF CONDUCT



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Briogeo

NIOXIN

PROFESSIONAL  
SEBASTIAN

CLAIROL



CLAIROL  
PROFESSIONAL



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SASSOON  
PROFESSIONAL

SEB  
MAN  
SEBASTIAN

# What **WECare** about



## Our **CUSTOMERS AND BUSINESS PARTNERS**

1. Fair competition
2. Personal data and privacy
3. Anti-bribery and corruption
4. Prevention of money laundering
5. Gifts and entertainment
6. Conflicts of interest
7. 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**

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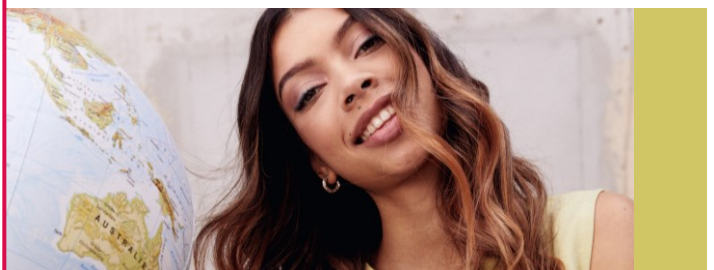
## Our **PEOPLE**

1. Health, safety and security
2. Equality and fair treatment
3. Employee representatives
4. Personal data and privacy



## Our **CONSUMERS AND PRODUCTS**

1. Safety and wellbeing of our consumers
2. Personal data and privacy
3. Advertising and packaging
4. Responsible innovation



## Our **SHAREHOLDERS**

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

## Our CODE

# 1. A message from our Chief Executive Officer

Dear Colleagues,

You, our global employees, are our most treasured assets and vital to Wella Company's continued success.

We are the caretakers of our 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 specific to the needs of our new company and presents a moral behavioral framework to uphold that responsibility and to provide daily guidance.

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 market and business activity. A commitment to integrity, acting honestly and ethically, and complying with the law are critical to our continued success.

Thank you for all you do and for affirming our Code of Conduct.

Regards,

Annie



Annie Yang Scrivner

## Our CODE

# 2. Our Values and our Code

The Wella Company Values define who we are, what we stand for and the example we want to set in how we act. We all follow the Values and embed them in everything we do.

Our Code reinforces and supports our Values. The Code sets out the minimum standards of behavior expected from each of us and guides us on how to do the right thing when we face challenges.

At Wella Company WE are Collaborative, Creative, Courageous, Connected and Committed.

### VALUES

#### Collaborative

**WE** work together to create the extraordinary.



#### Creative

**WE** foster creativity & excellence to create value for our brands & business.



#### Courageous

**WE** are agile, entrepreneurial & we own our future.



#### Connected

**WE** stay connected & ensure we are always consumer first.



#### Committed

**WE** are responsible for our impact on others & the planet.



### CORE COMPETENCIES

Act as One Team

Innovate to Create Value

Drive for Results

Own Customer & Consumer Journey

Champion Diversity, Inclusion & Sustainability

## Our CODE

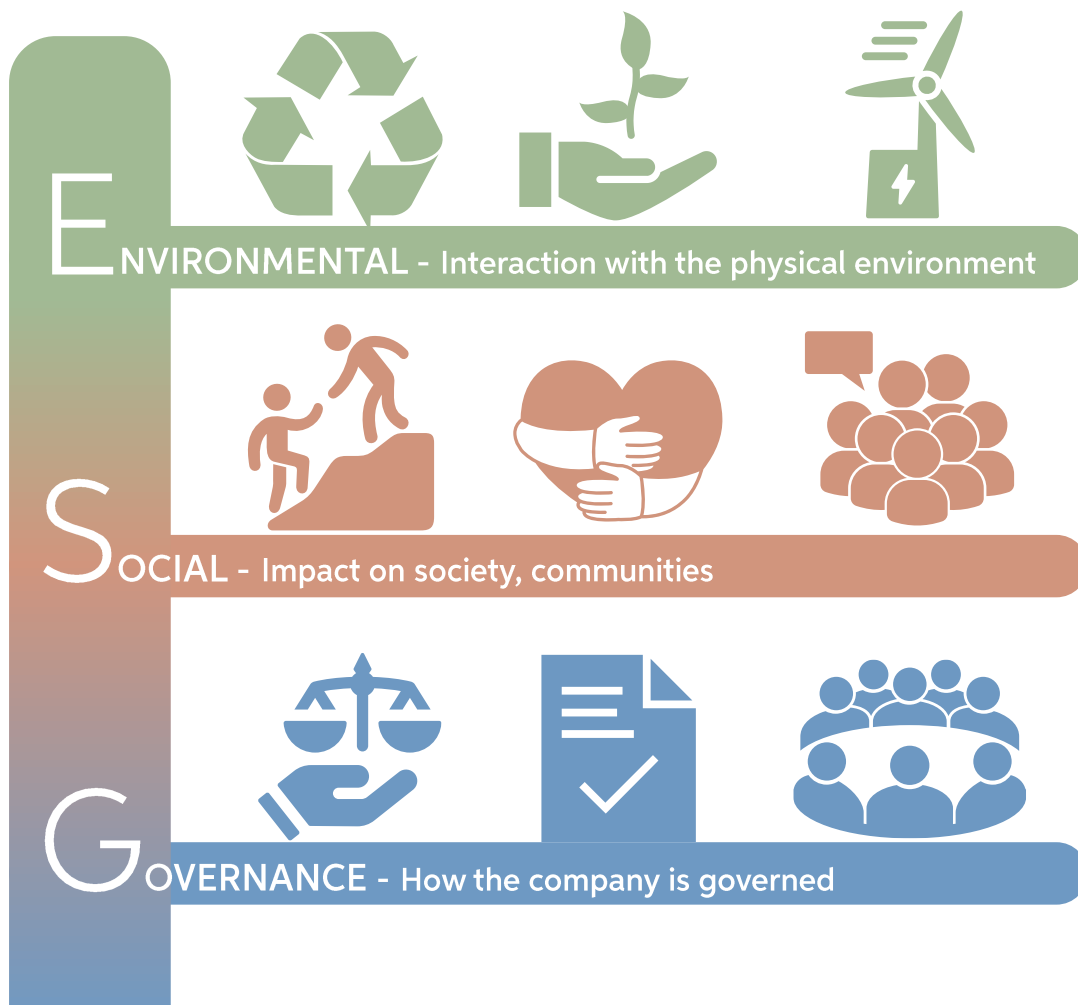
# 3. Our commitment to Environmental, Social, and Governance (ESG)

Our Code underpins our commitment to ESG. Our Code is a key part of our internal governance and together with our Values it is the way we work together to face and manage ethically the way we run our business.

We believe businesses play a critical role in shaping, influencing, and enabling people, organizations and societies to thrive. We seek to help solve the social, environmental and governance challenges the world faces. We prioritize our 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 are building ESG into the fabric of our company which begins with People. We have dedicated goals and targets to become more diverse, inclusive and equitable within the ranks of Wella Company and longer term, with our supplier base. We strive to operate at the highest levels of human rights and business ethics in our organization, with our suppliers and business partners and across our value chain.

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



## Our CODE

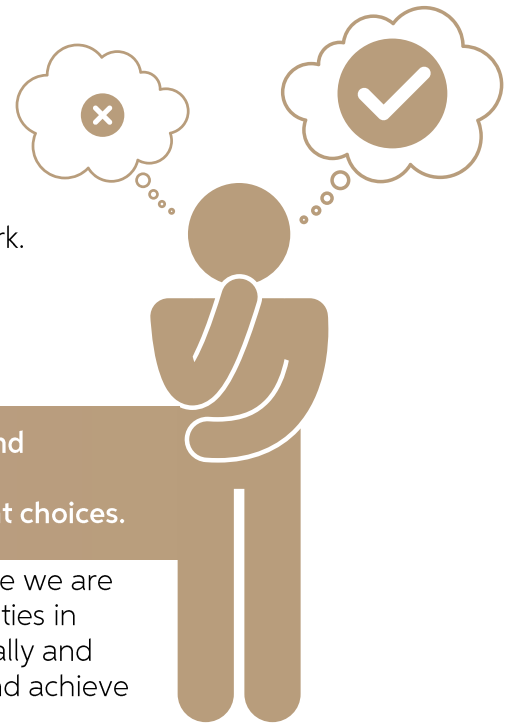
### 4. Why do WECare?

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 Values 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 Wella Company across the globe. The Code helps us to make the right choices.

Observing our Code will also maintain our good reputation and ensure we are trusted by our customers, business partners, colleagues, the communities in which we operate, our regulators and stakeholders. When we act legally and with integrity, we can be proud of how we manage our challenges and achieve our successes.



### 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, we trust you to follow the stricter standard set out by that law and to do the right thing. If you have any doubts, contact Compliance.



### 6. Our Code and company policies

Our Code works alongside other Wella Company policies, procedures and guidance, which are consistent with the Code. In the event of any doubt, the Code will always apply first.

The Code cannot cover every possible situation, so we rely on you to use good judgement and comply with the Code and our Values. If you cannot find the guidance you need, please contact the Compliance team.

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



## Our CODE

# 7. WECare is for everyone

Our Code applies to all employees, officers, and members of the Board of Directors of Wella Company and any of its affiliates<sup>1</sup>. For the avoidance of doubt, this includes ghd and Briogeo.

Individuals and companies conducting business on our behalf must also follow our Code of Conduct. Agents, business partners, suppliers, vendors, manufacturers, contractors, distributors and other third parties can have a direct impact on our reputation through their behavior.

For this reason, we expect and encourage individuals and companies conducting business with us and their employees to act in a way that is consistent with our Code.

Failure to act in line with the Code can have serious consequences for Wella Company as well as the individuals involved.

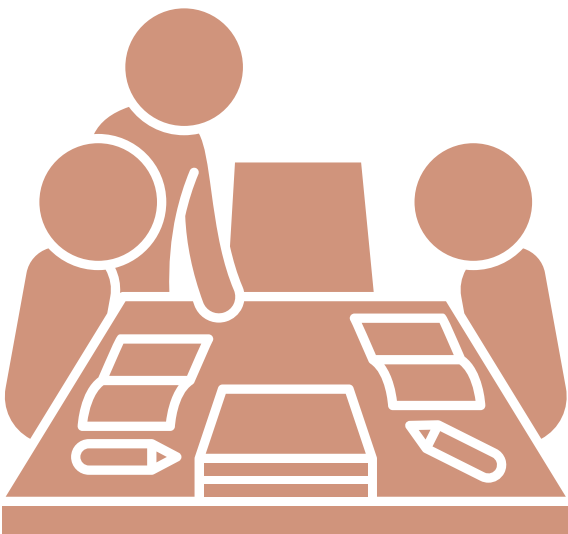
<sup>1</sup> Wella Company means Rainbow UK BidCo Ltd. Affiliates means any entity that directly or indirectly controls, is controlled by, or is under common control of Rainbow UK BidCo Ltd.



# 8. Employees' responsibilities

All Wella Company employees are responsible for the following:

- Reading, understanding, and following our Code and company policies and procedures.
- **Attesting annually that they will comply with the Code.**
- Participating in compliance training when requested.
- Promptly raising concerns when they become aware of violations of laws or our Code.
- Cooperating fully when responding to an investigation or audit.



## Our CODE

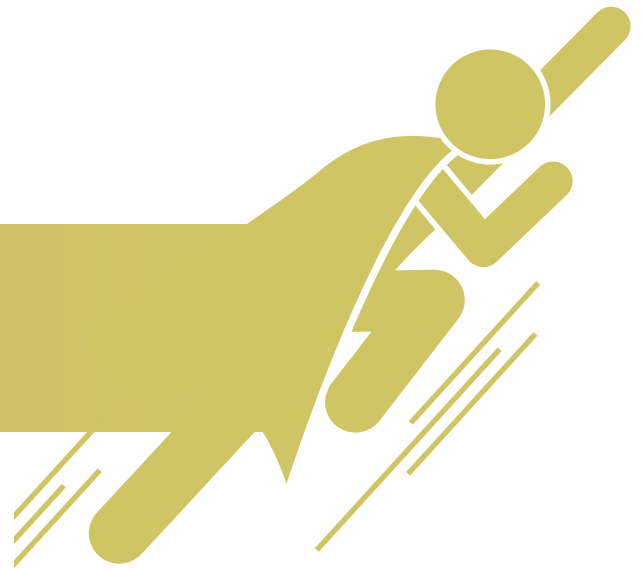
# 9. Responsibilities of managers and team leaders

We expect more of our managers and team leaders. They should lead by example and be responsible for driving a culture of integrity throughout the organization. This means managers should always live our values and comply with our Code.

In addition, it means if you are a manager, you should:

### Be a positive role model.

You should lead by example and demonstrate our Values as well as always acting in line with our Code. You should also maintain a respectful and inclusive environment.



### Raise awareness about our Code.

You should help your team members to understand the expectations of our Code, company rules and applicable laws. You should also ensure that your team members are aware of, and properly trained on, the laws and regulations applicable to their daily work.

### Encourage a speak up culture.

Managers should create an environment where employees are comfortable speaking up without fear of retaliation. Take seriously any concern raised. Take appropriate and consistent actions when someone violates the Code.





## Our CODE

### 10. Speak up

At Wella Company we speak up if we see possible illegal or unethical behavior, including potential or actual breaches of our Code.

If you have a concern, we encourage you 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.



### 11. Anti-retaliation

We prohibit any retaliation against anyone for raising or helping to address, in good faith, a genuine business conduct concern.

Anyone who takes retaliatory action against an employee or a third party acting in good faith may be subject to appropriate disciplinary action, including dismissal.

If you feel that you or someone you know has been retaliated against, please speak up and raise a concern immediately.

Retaliation can take many forms, for example: threats, dismissal, exclusion, humiliation, negative effects on salary, bonus, annual review, promotions, or shift allocations, early termination or cancellation of a contract for goods or services.



### 12. Our Hotline

Hotline

If you believe there are reasons you cannot raise a concern with your line manager or HR, or your concern has not been resolved, you may contact the Compliance team either in person or via E-mail at [wella.compliance@wella.com](mailto:wella.compliance@wella.com) or you may contact the Wella Ethics and Compliance Hotline - [hotline.wella.com](http://hotline.wella.com).

**The hotline is available to all employees, customers, business partners and any other party who wishes to raise a concern.**

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.

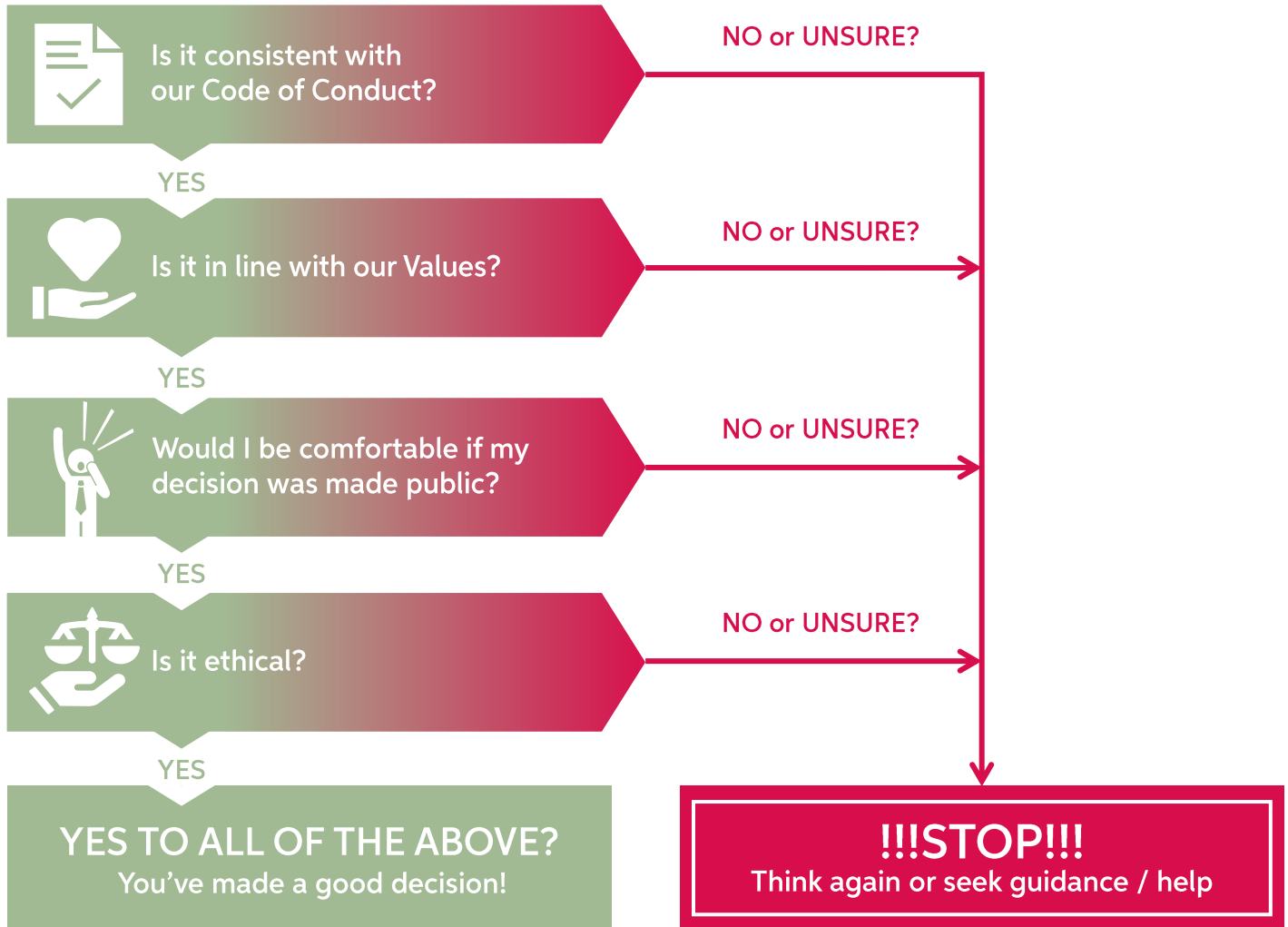
The Wella Hotline is operated on behalf of Wella Company by an independent third party, Convercent.

## Our CODE

# 13. Making good decisions

The Code covers a lot of things, but it does not cover everything. We trust you to use good judgment to make ethical decisions and to ask for help when you have questions or concerns. You can use the following decision tree to help you.

### 4 STEPS TO A GOOD DECISION... ASK YOURSELF:



# 14. Where to get help



**Online:**  
[WECare.wella.com](http://WECare.wella.com)



**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.



**In Person:**  
You can speak with your manager and you can always contact the Wella Company Chief Compliance Officer, the members of the Compliance team and the Chief Legal Officer.



# Our PEOPLE

Our people are our greatest strength and asset.

We strive to create a work environment where people bring the best of themselves to work and where they can thrive.

Our success depends upon us acting as a team across Wella Company and building positive partnerships and trust.

The environment we operate in should be safe, secure and comfortable. We want to foster a diverse and inclusive work environment and treat each other with respect.

1. Health, safety and security
2. Equality and fair treatment
3. Employee representatives
4. Personal data and privacy

## 1. Health, safety and security

**Good safety is good business. We are committed 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.**

**We follow all health and safety laws and regulations** that apply to our workplace and aim to continuously enhance our health and safety performance.

A safe and secure work environment also means a workplace free from alcohol and substance abuse. **We do 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 seek to maintain a workplace where our employees can work without feeling threatened or unsafe. We prohibit weapons on all of the Company's properties consistent with local law. If you have concerns that someone may have a weapon on our property, report it immediately to HR and your manager.

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

### Please speak up if you see...

...any unsafe acts, avoidance of safety procedures, or other security concerns. Immediately report it to your line manager, HR, Legal 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 applicants.**

**We 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.

**We do 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 our 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.

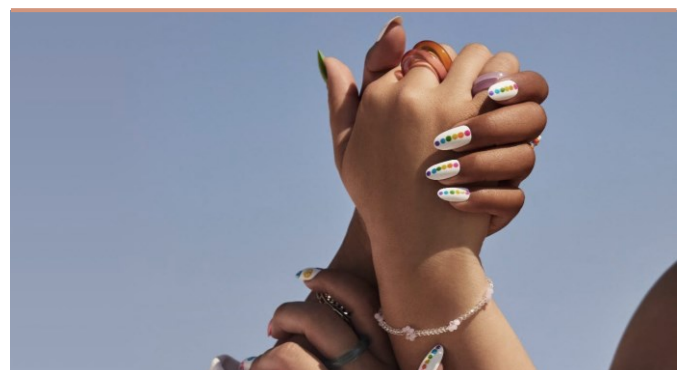
### Please speak up if you see...

...anyone being harassed or discriminated against.



- ALWAYS**
- o Support and promote an inclusive work environment.
  - o If you are unsure and feel that something is not right, discuss it with your line manager or HR.
  - 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.



For more resources visit our **CODE HUB**

### 3. Employee representatives

**We support employee rights to act through employee representatives, unions and works councils and promote positive dialog with all representatives.**

We respect employees' right to freely express views and opinions and right to freedom of association and collective bargaining. Employees are free to join organizations and unions to promote and protect their professional interests. We encourage cooperation with employee representatives to ensure that everyone within the organization is heard and employees' rights and interests are properly protected.

Please speak up if you see...

... your right to join or create a union is not respected.

... you feel you are discriminated against because of your involvement in a union or any form of employees' representation.



ALWAYS

- o Respect and consider the rights and prerogatives of employee representatives, unions and works councils.
- o Make sure that employee representatives are informed, consulted or exercise codetermination rights (when applicable), according to or in line with local regulations.

NEVER

- o Disregard rights of employee representatives, unions or works councils.
- o Misrepresent information provided to employee representatives.



### 4. Personal data and privacy

**Privacy, and personal data protection, is a fundamental right. We respect and protect the confidentiality of our employees' personal, medical, family, and financial information.**

We only collect and use personal data that we need for the effective operation of Wella Company or for compliance with the law. We ensure that it is properly secured and can be accessed only by authorized personnel. We do not disclose such information to anyone, internally or externally, other than those with a legitimate need and when we are legally permitted to do so.

If we share personal data with third parties to provide services to us, we ensure that they are contractually obliged to protect it in accordance with applicable data privacy laws.

Please speak up if you see...

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



ALWAYS

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

NEVER

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



For more resources visit our [CODE HUB](#)



# Our CUSTOMERS AND BUSINESS PARTNERS

We work with our customers and business partners in an honest, respectful and responsible way and we expect them to treat us in the same way. Our suppliers and business partners are essential to our ability to do business and meet our stakeholders' expectations. That is why we seek 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 customers and business partners which includes suppliers, consultants, agents, retailers, distributors, salons, drugstores, stylists, and influencers.

1. Fair competition
2. Personal data and privacy
3. Anti-bribery and corruption
4. Prevention of money laundering
5. Gifts and entertainment
6. Conflicts of interest
7. Trade controls and sanctions

## 1. 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 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 do not engage in these activities. We do not limit our customers' freedom to set their resale prices when such a restriction would violate antitrust law.

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

**Please 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 the 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 our products.
  - Share commercially sensitive information with our competitors or any other third parties.
  - Allow conversations at a trade association meeting to cover prices, bids or markets.

## 2. Personal data and privacy

**We respect and protect the privacy and confidentiality of our customers and business partners.**

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 third parties to provide services to us, we ensure that they are contractually obliged to protect it in accordance with applicable data privacy laws.

**Please speak up if you see...**

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



- ALWAYS**
- Make sure we inform people of the type of information we are collecting about them, 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 inaccurate or out of date.
  - Keep personal data secure and restrict access on a strict "need to know" basis.
- 
- NEVER**
- Keep personal data longer than necessary.
  - Provide personal 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.



For more resources visit our **CODE HUB**

### 3. Anti-bribery and corruption

**We do not tolerate bribery and corruption in any of its forms in our business.**

We comply with anti-bribery and corruption laws and regulations and work to make sure that our business partners share our commitment.

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 strive to ensure our business partners and third parties 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.

Please 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 company funds are not used for unlawful purposes.
- o Know who you are doing business with by following our counterparty 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.

### 4. Prevention of money laundering

**We 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 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.

Please speak up if you see...

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

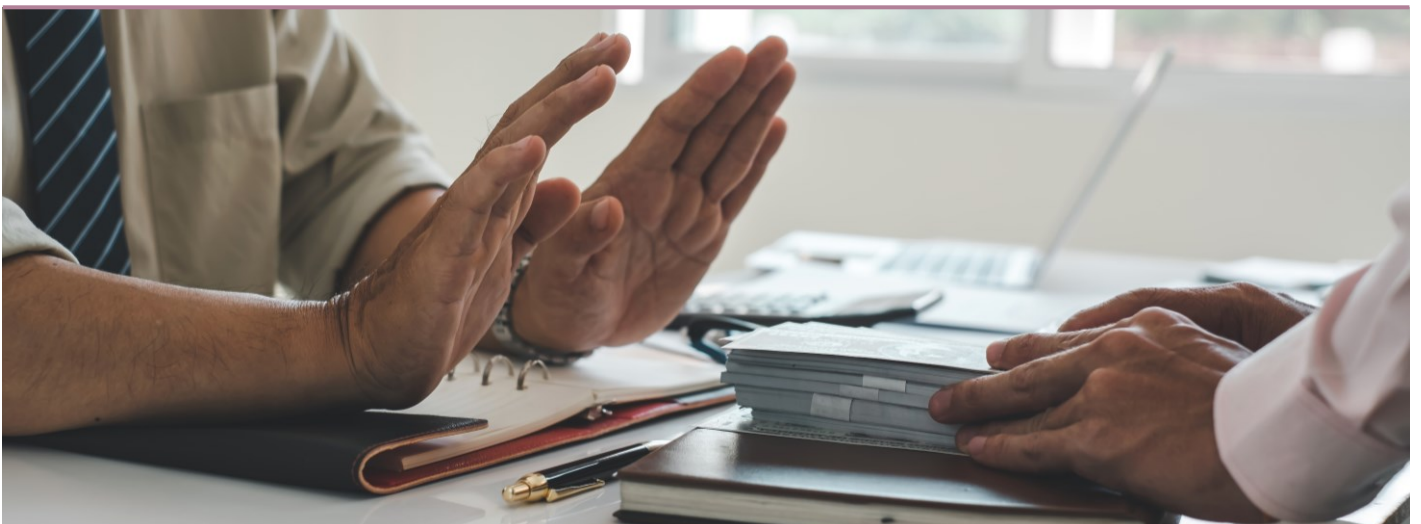


**ALWAYS**

- o Follow our procurement procedures to evaluate third parties you want to work with.
- o Consult with Procurement or Compliance if you have suspicions.

**NEVER**

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



For more resources visit our [CODE HUB](#)



# 5. 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.

Beware of giving or receiving 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 beware of giving or receiving a gift close to the award of any business or contract.

You should disclose your gifts and entertainment to your line manager in an email using our [disclosure form](#) so that you can show you did so if you need to later. You can also, if you want, disclose anything to Compliance using the compliance mailbox at [wella.compliance@wella.com](mailto:wella.compliance@wella.com).

If there is a conflict between Wella Company's gifts and entertainment requirements and applicable external 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 trust you to use your common sense in this regard.

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

### GLOBAL LIMITS (PLEASE CHECK FOR ANY LOCAL LIMITS AND POLICIES):

#### Given by Wella Company

- o Up to €\$20 in value – no action required.
- o Over €\$20 in value – disclose to your line manager.
- o Cannot exceed €\$200 in value.
- o Must comply with the recipient's rules.
- o Cannot be given to government officials.

Please 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 your 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 misstate the full cost of a given gift or entertainment.

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

#### Received by Wella Company

- o Up to €\$50 in value – no action required.
- o Over €\$50 in value – disclose to your line manager.
- o Cannot exceed €\$200 in value.
- o Cannot be received by any employee working in a Supply Chain or Procurement role.
- o Cannot be asked for or solicited.



For more resources visit our [CODE HUB](#)

## 6. 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 our work. It is important that we identify and disclose conflicts when we encounter them so as to protect the reputation of Wella Company and also our own personal reputations.

Disclose situations that might create a conflict to your line manager, or even the appearance of a conflict. 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 or HR.

Please speak up if you see...

...a work colleague who has a conflict but is not disclosing and managing it.



ALWAYS

- o Disclose conflicts and potential conflicts to your line manager.
- o Check with your line manager 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 disciplinary measures being taken against you.
- o Use company equipment, time, resources or information for another job or business.



For more resources visit our [CODE HUB](#)

## 7. 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 trade 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.

We 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 import or export Wella Company products, including equipment, software, and technology, these must be classified in advance, and all required labelling, documentation, licenses and approvals completed.

**Please speak up if you see...**

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

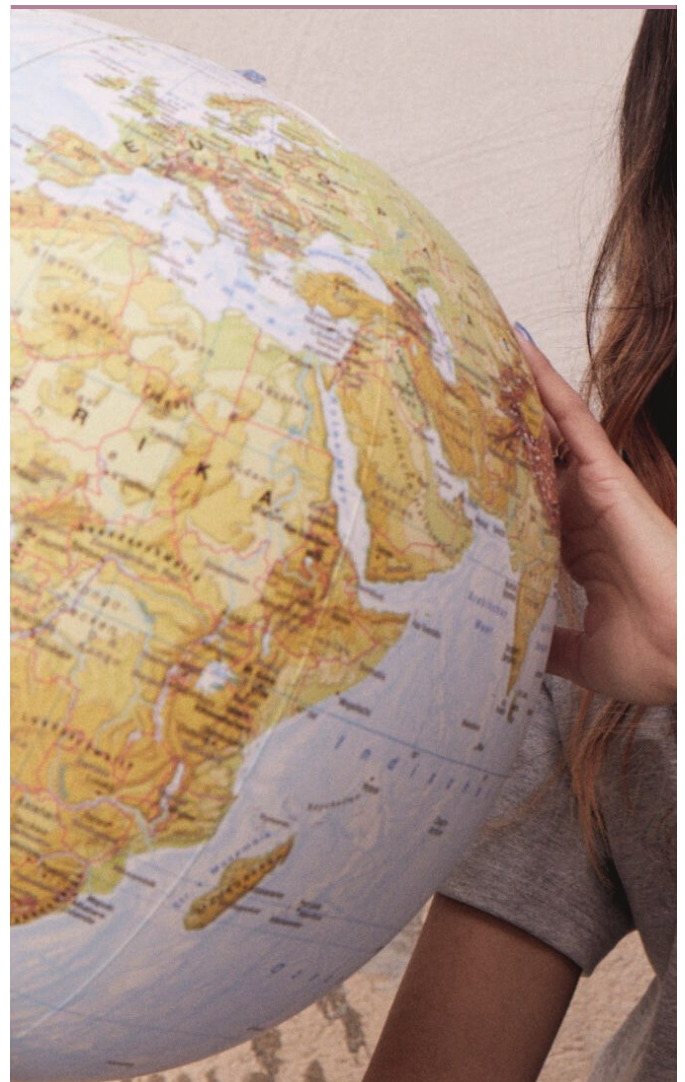


**ALWAYS**

- 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 have been classified under export and import laws by the Transportation and Customs team.
- o Get advice from the Legal team 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. Safety and wellbeing of our consumers
2. Personal data and privacy
3. Advertising and packaging
4. Responsible innovation

## 1. Safety and well-being of our consumers

**We are committed to offering products and services of the highest quality that are safe for the people who use them.**

We seek to ensure that our products and services are created with respect and care for the planet and its resources. This commitment extends from product conception through distribution and after a product has been put on the market. We seek to comply with all national and international regulatory requirements in the markets where Wella Company operates to ensure product quality & safety.

We will never knowingly sell or provide a product to our consumers that is dangerous, may harm them, or does not meet the high-quality standards expected of Wella Company.

We take consumer concerns, complaints and feedback about our products and services seriously and strive to use this information to continuously enhance our offerings, and their safety.

### Please speak up if you see...

...a consumer claim about a potential health or safety concern related to one of our products that is not being dealt with appropriately or in a timely manner.



### ALWAYS

- o Apply the highest standards of hygiene and quality control at each stage of the product development, manufacturing, and distribution processes.
- o Ensure our consumers receive the best possible service every time they interact with Wella Company.

### NEVER

- o Ignore any potential concerns about product safety, tolerance, or quality control issues.
- o Limit discussion or feedback about product safety.



## 2. Personal data and privacy

**We respect and protect the privacy and confidentiality of our consumers**

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 consumers' 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 third parties to provide services to us, we ensure that they are contractually obliged to protect it in accordance with applicable data privacy laws.

### Please speak up if you see...

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

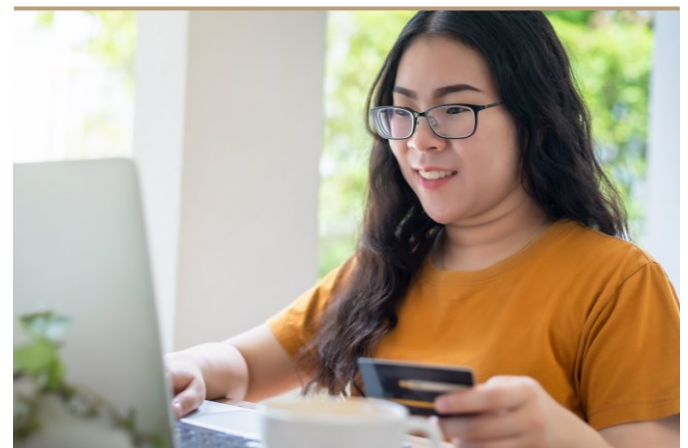


### ALWAYS

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

### NEVER

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



For more resources visit our [CODE HUB](#)

### 3. 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.**

We seek to be responsible in the way in which 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.

Please speak up if you see...

...marketing or other materials that are not truthful or may exploit our consumers.



**ALWAYS**

- o Follow the Wella Company's Global Claim Approval Process (GCAP) and all its rules.
- o Be truthful in describing our products, their effects and benefits.
- o Design sales and marketing of materials so that they are clear and easily understood, particularly with respect to offers and their conditions.

**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.



### 4. Responsible innovation

**We seek to innovate in a way that does no 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.

Please speak up if you see...

... products or services that have been created within Wella Company using materials or elements 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 for the raw materials and constituent components for our products, their authenticity and their ethical 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 markets or communities in which we operate.



For more resources visit our [CODE HUB](#)



# 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 business partners to share this commitment. We are mindful of our 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.**

We will not tolerate discrimination in any form, by anyone from Wella Company or our associated 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.

**Please speak up if you see...**

... a potential or current customer or business partner of Wella Company 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 Wella Company or by anyone we work with.
  - o Work with third parties who violate human rights.

# 2. Protection of the environment

**We have prioritized sustainability and care for the environment as core to our mission. 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 any adverse environmental effects from our operations, products, and services, and we implement programs to improve our water and energy efficiency and reduce our carbon intensity and the waste produced from our activities.

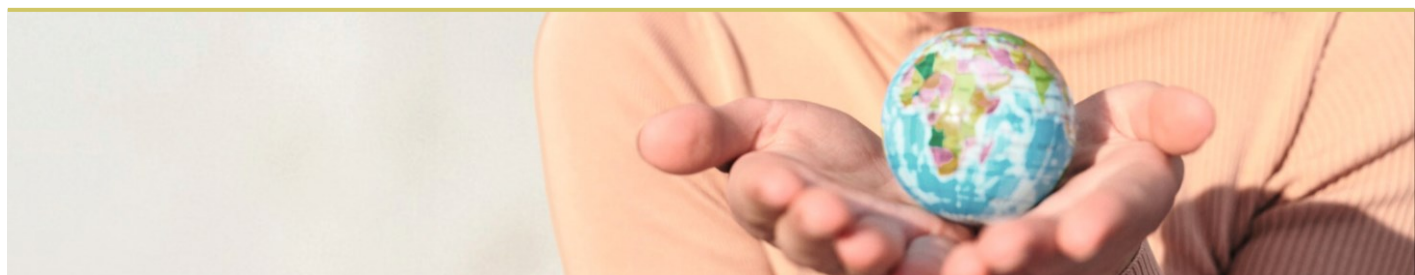
We want our partners to conduct their businesses in the same way, both in their dealings with Wella Company and their other customers as well.

**Please speak up if you see...**

...any activity within Wella Company or by one of our partners or suppliers 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.



For more resources visit our **CODE HUB**



### 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.

Please speak up if you see...

...contributions being made in the name of Wella Company to organizations whose values are in direct conflict with our own.



ALWAYS

- o Ensure that donations made by Wella Company are legal and ethical.
- o Confirm that donations made by Wella Company are solely used to support the charity and the stated purpose as approved.
- o Check with Compliance if you have any doubts.

NEVER

- o Engage Wella Company with organizations that do not reflect our Values.
- o Oblige colleagues or business partners to donate or make contributions to projects supported by 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.

Employees may voluntarily contribute their personal time and money to support political parties, candidates or campaigns. However, it must be clear that such support is personal and is not related to Wella Company.

Please speak up if you see...

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



ALWAYS

- o Keep personal political activities separate from your work for Wella Company.

NEVER

- o Engage with politicians or regulators without proper authorization from the Communications function.
- o Use company funds or resources to support any political party or candidate.



For more resources visit our [CODE HUB](#)



# 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.

Please 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 our transactions are legitimate and based on valid documentation.
- o Fully cooperate with external and internal auditors.
- o Follow our Delegation of Authority Policy to ensure only authorized persons execute contracts and approve transactions.

**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 our 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.**

We will not:

- o Download personal software to our work computer.
- o Share Wella Company system & phone login details.
- o Leave computing devices and mobile phones, unlocked and unattended.
- o Access company confidential information in a public place.

Wella IT Security checks, monitors and sometimes blocks emails and internet traffic as well as documents entering and leaving the company, particularly those containing explicit language or pictures.

We do not access inappropriate material, misuse company email or other systems. This is prohibited and breaches may be managed as a disciplinary matter and may also involve criminal actions.

Please speak up if you see...

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



**ALWAYS**

- o Protect your company passwords and follow prompts to change them.
- o Safeguard your laptop, especially when you are using it outside of Wella Company offices.
- o Report suspicious emails using the "Report Phishing" button within Microsoft Outlook.
- 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.
- o Install software on your device without ensuring that it has been seen, checked and approved by IT Security.

For more resources visit our [CODE HUB](#)

## 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.**

We treat Wella Company assets, money and information as if they were our own. We do 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 Better Spend Guidelines.

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 will always safeguard our intellectual property assets and prevent their misuse by others. We respect the intellectual property of others and prohibit the 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

- Use company assets and money in line with the appropriate policies.
- Alert the Legal team if you suspect any of our products have been counterfeited.
- Make sure that the use of the company's IT systems or devices for private purposes is appropriate and in compliance with applicable laws.

NEVER

- Use corporate assets, information, or position for personal gain or inappropriate purposes, or remove them from company premises without authorization.

Please speak up if you see...

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

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



## 4. Communicating externally

**We communicate carefully, clearly and honestly with our customers, partners, suppliers, and investors, and with the public in general.**

We only speak on behalf of Wella Company if we are authorized to do so. Unless it is within the scope of our individual responsibility, we will 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 media, bloggers or other external audiences.

We are polite, professional and respectful when we use social media. The way we use social media may influence how others view Wella Company and its Values. We follow the Social Media Guidelines.

We co-operate with government agencies and other regulatory bodies in the performance of their functions, inquiries, and investigations, and we do so in full compliance with applicable laws. Any information or disclosures we provide as part of this are truthful and complete.

### Please speak up if you see...

... a fellow 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

- o Refer any requests for comment from media or external parties to your local Communications team, or if warranted to the Global Communications Leaders.
- o Speak to your local Marketing team for marketing related enquiries.
- o 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 your manager or local communications leaders to make them aware.
- o Notify your manager or the Regulatory Affairs team if you are asked to provide information to a government agency or regulator, unless doing so is within the scope of your role.
- o Seek the guidance of the Legal Team if you are contacted by a government agency, regulator, or other third party in relation to an investigation, or litigation.

### NEVER

- o Create the impression that you are speaking to third parties as a representative of Wella Company unless it is specifically within the scope of your role.
- o 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.** We never use inside information to trade in the securities of any company including our owners, customers, partners, and suppliers, both current and prospective. Where we have access to unpublished, price sensitive information about any company we do not use it for our own or another's benefit.

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

### Please speak up if you see...

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



### ALWAYS

- o Consult with the Legal team if you have any doubts.

### NEVER

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



For more resources visit our [CODE HUB](#)



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PROFESSIONAL

Kadus  
PROFESSIONAL

Londa  
PROFESSIONAL

SASSOON  
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SEB  
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WECare

OUR CODE OF CONDUCT