

A letter from the CEO

The Art Cosmetics Ethical Code clearly expresses the values, commitments, priorities and responsibilities held by our organisation since its foundation.

All the principles of the Code are to be applied to our professional activities and to the management of our relations with customers, suppliers, all our employees and anyone who has a relationship with Art Cosmetics.

Fairness and transparency in the conduct of our company have been consolidated through the establishment of the Ethics Committee and shared via the company's Ethical Code. Ethics and social and environmental sustainability form the basis of the 'responsibility and commitment' on which Art Cosmetics bases its business. Ethics for us means respect for consumers, customers, suppliers, the environment and all stakeholders.

Sharing the corporate principles contained in the Ethical Code allows us to face the ethical choices that arise in our daily lives with relative ease. Knowing the Ethical Code allows Art Cosmetics to ensure quality, innovation and sustainability.

It is essential to read, understand, accept and share the Ethical Code in order to ensure our continuous improvement. We expect everyone working at Art Cosmetics and all those who have relations with our company to act in accordance with the principles contained in the Ethical Code.

These values and principles will contribute to the 'ethical growth' of Art Cosmetics, the community and all those involved. I urge everyone to comply with the Ethical Code in its entirety.

Francesco Geuna CEO

Date: 14th January 2021

Signature: ____

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O1 Art Cosmetics Purpose

Listen to your Art

Our Ethic encapsulates the corporate commitments that characterise our operations and that are constantly pursued and disseminated both internally and externally. This document sets out the company's core values and demonstrates our commitment to operate ethically and responsibly towards all our stakeholders.

Art Cosmetics and Corporate Social Responsibility

Legal and regulatory compliance

All Addressees of this Ethical Code must conduct themselves in full compliance with the law.

We have voluntarily adopted the Organisational, Management and Control Model pursuant to Legislative Decree 231/01 on administrative liability, which aims to protect the company.

The '231 Model' is a valuable tool for monitoring compliance with the ethical principles we are committed to through the activity of the Supervisory Board.

The goal we will continually pursue is to make the laws governing the company's activities known and respected in every sector and by every employee.

We are committed to complying with the legal requirements, regulations and applicable standards in which we operate with regard to health and safety, the environment, human rights and ethics, IT security and business.

O3 Art Cosmetics Health and Safety

All Addressees of this Ethical Code must comply with the rules set out to protect health and safety in the workplace.

We consider workplace protection, in terms of safety and hygiene, to be a fundamental corporate value, and we aim to guarantee and protect the psychophysical health of all workers and external collaborators working in the company.

We strictly comply with the regulations and promote all useful initiatives, including voluntary ones.



Art Cosmetics Environmental Protection

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All Addressees of this Ethical Code must comply with the rules set out to protect the environment.

We aim to respect both the health of the workplace **environment** inside the company as well as the external environment in order to **minimise the environmental impact** of our activities.

We actively promote a culture of respect for and protection of the environment and push ever-greater **environmental responsibility** amongst both our internal and external collaborators.

O5 Art Cosmetics and People

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Personnel selection, recruitment and evaluation

When selecting, hiring and evaluating personnel, we will only apply the 'principle of equality', transparency, protecting privacy and human dignity and rejecting any kind of discrimination or favouritism.

02

Working relationship

We base our working relationship on trust and on the principles of fairness and loyalty. As such, we expect our employees and collaborators to be diligent and proactive. We guarantee our employees a wide range of company benefits and rewards, and we are committed to respecting the right of employees to exercise their legitimate rights to free association and union representation.

03

Respect and protection of human rights

We are committed to respecting human rights and to treating all our employees and contractors with equality, dignity and respect.

We expect all our employees and contractors to act in accordance with these principles and to consider their actions and decisions and how they might affect others.

04

Equal opportunity and protection of women

We promote **equal opportunity**, dignity and protection for women, ensuring equal treatment in all aspects of employment between female and male workers

All Addressees of this Ethical Code must respect human rights and follow the principles set out in this Code.

05

Prohibition of discrimination

We foster an **inclusive work environment**. We do not accept any form of discrimination based on ethnicity, creed, religion, gender, age, disability, nationality, marital status, sexual orientation, trade union membership or political affiliation. We are particularly focused on the most delicate situations and ensure

06

Prohibition of harassment and sexual violence

commensurate protection.

We reject any form of persecution and sexual violence, whether verbal and/ or physical, in order to safeguard and protect the fundamental rights of the individual.

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Prohibition of child labour

We do not accept any form of child labour, either directly or indirectly. Anyone younger than the minimum age defined by law for employment in the partner's country may not be employed and we will terminate any relationship with individuals who violate this fundamental principle/prohibition.

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Prohibition of exploitation

We do not allow the exploitation of male or female workers either directly or indirectly and we respect the rules regarding working hours, leave, rest and holidays.

We support all applicable laws relating to the prevention of human trafficking and the prevention of modern forms of slavery. Mandatory overtime is not allowed and employees must be free to terminate their employment after giving reasonable notice.

O Art Cosmetics and Data Protection

All Addressees of this Ethical Code must respect privacy and use personal data in accordance with the law and company policies.

They shall ensure the confidentiality of all information and protect the intellectual property and industrial property of the company and any other company.

01 IT security

We protect our employees, contractors, customers and company assets by implementing information security policies through the protection of computer systems and information and the implementation of a log management system in accordance with the GDPR, as described in our 'Log Management Reg. EU 679/2016' policy.

02

Use and protection of personal data

We are committed to ensuring the protection of the personal data of our employees, customers and collaborators in accordance with the relevant regulations and with particular attention to compliance with the principles of fairness, lawfulness and proportionality. As described in our 'Policy for the management of processing according to the principle of Privacy by Design and Privacy by Default', we always put the protection of personal rights and dignity first, carefully screening all operations and procedures that may involve the processing of data.

03

Protection of company assets

We promote a culture of respect for the integrity of the company's assets and resources among our collaborators so that they are used in their own way and in accordance with the company's interests while refusing any form of improper use.

Our collaborators must protect

Our collaborators must protect confidential information, company secrets and all information acquired in the performance of their activities and may not use them for anything other than company or personal purposes.

To this end, the company provides training in physical and IT security and is committed to implementing a Security Management System as outlined in the 'Security Policy'.

04

Intellectual and industrial property rights

We retain and protect copyrights and intellectual and industrial property rights, both our own and those of third parties. Our 'Company Information and Personal Data Security Policy' sets out the procedures and limits for the use of company and personal devices, as well as the rules for the use, storage and dissemination of any information relating to the company and its business or professional activities.

7 Art Cosmetics and Business

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Relations with Public Administration

We are very sensitive to the issue of **anti-corruption**. As such, the conduct of our relations with Public Administration is regulated by the '231 Model'.

02

Business relations

We establish commercial relations with companies which demonstrate that they share the principles contained in our Ethical Code.

We select our suppliers on the basis of objective assessments based on the principles of fairness, ethics, quality, innovation, cost-effectiveness and continuity, and in compliance with company procedures and the '231 Model'.

04

Conflict of interest

Corporate interests take priority in all business dealings. No employee of ours may benefit directly or indirectly through the **improper use of relationships or dealings** with natural or legal persons outside the company.

Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted if and only if they comply with company procedures.

including employees, must refrain from any anti-competitive, corrupt and unlawful conduct.

All Addressees of this Ethical Code.

03

Fair competition

We are committed to the principles of **fair competition** and ensure compliance with antitrust laws in all forms of business agreements and practices.

Integrity and transparency

We endeavour to reinforce our integrity by formalising our ethics and corporate morals in the principles contained in this Ethical Code.

We guarantee the transparency of every process and operation within the company so as to **ensure fairness** and **respect** for the principles we pursue, enunciate and espouse.



OB Guide to the Code and Whistleblowing

Application of the Ethical Code

The Ethical Code mainly serves the **purpose of providing ethical and behavioural guidance** and with the aim of achieving complete adherence to and sharing of the principles it contains at all levels, both within the company as well as outside of it. Checks regarding the application of the Ethical Code are to be carried out by each employee, each department manager and the supervisory board.

From among the supervisory bodies, the Ethics Committee is responsible for monitoring the correct application of the Ethical Code.

Those subject to the Ethical Code

We expect and require all our collaborators, customers, suppliers, respective employees and all those who have relations with us to accept, share and fully respect the principles contained in this Ethical Code.

This Ethical Code is distributed to our employees and to all our associates, who must comply with its contents.

We **encourage the sharing** of the principles set out in our Ethical Code with customers, suppliers and external collaborators and we will strive to ensure that they take them on board for themselves.

Distribution, disclosure and acceptance of the Ethical Code

The Ethical Code is distributed through the most suitable channels to everyone subject to it.

By receiving this Ethical Code, Art Cosmetics considers the contents and ethical and behavioural guidelines contained therein fully accepted.

Whistleblower reports

Anyone who wishes to submit a suggestion for improvement or who wishes to report an instance of non-compliance with the Ethical Code may report it to the Ethics Committee via the following e-mail address:

comitato.etico@artcosmetics.it

Art Cosmetics Ethical Code

LISTEN TO YOUR HEART