

CODE OF ETHICAL CONDUCT

Based on the ETI Base Code (*Ethical Trading Initiative*)

This Code is a commitment from everyone to ensure an ethical, fair, and safe environment.

1. Employment will be freely chosen

1.1 There will be no involuntary, forced, or slave labor.

1.2 Workers shall not be required to lodge deposits or identity documents with their employer and shall be free to leave after giving reasonable notice.

2. Freedom of association and the right to collective bargaining will be respected

2.1 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer shall adopt an open attitude towards the activities of trade unions and their organizational activities.

2.3 Workers' representatives shall not be discriminated against and shall have access to carry out their representative functions in the workplace.

2.4 Where the law restricts the right to freedom of association and collective bargaining, the employer shall facilitate, and not hinder, the development of parallel means for free and independent association and bargaining.

3. Working conditions shall be safe

3.1 A safe and hygienic working environment shall be provided, considering prevailing industry knowledge and any specific hazards. Reasonable and practical steps shall be taken to prevent accidents and health risks that may arise from, or be associated with, the work environment.

3.2 Workers shall receive regular and documented health and safety training, provided whenever new or transferred workers are employed.

3.3 Access to clean toilet and changing facilities, potable water, and, if necessary, sanitary facilities for food storage shall be provided.

3.4 Where accommodation is provided, it shall be clean, safe, and meet the basic needs of workers.

3.5 A senior management representative shall be assigned responsibility for health and safety.

4. Child labor shall not be used

4.1 Child labor shall not be employed.

4.2 Companies shall develop or participate in policies and programs that provide a transition plan for any child found to be working, enabling them to attend and remain in quality education until reaching legal working age.

4.3 Children and young workers under 18 shall not be employed at night or in hazardous conditions.

4.4 This policy and procedures shall conform to ILO standards.

5. Living wages shall be paid

5.1 Wages and benefits for a standard working week shall at least meet national legal standards or industry benchmarks, whichever is higher. Wages shall always be sufficient to meet basic needs.

5.2 All workers shall be provided with clear, written, and understandable information about their employment conditions, wages, and pay details before employment and for each pay period.

5.3 Deductions from wages as a disciplinary measure shall not be permitted, nor any deductions not provided for by national law without the express permission of the worker concerned.

6. Working hours shall not be excessive

6.1 Working hours must comply with national laws, industry benchmarks, or the one offering greater protection.

6.2 In no circumstances shall workers be required to work regularly over 48 hours per week and shall be provided at least one day off in every 7-day period. Overtime shall be voluntary, not exceed 12 hours per week, not be demanded regularly, and shall always be compensated at a premium rate.

7. No discrimination shall be practiced

7.1 There shall be no discrimination in hiring, compensation, training access, promotion, termination, or retirement based on race, social class, origin, religion, age, disability, gender, marital status, sexual orientation, trade union membership, or political affiliation. (Equality and Non-Discrimination Policy)

8. Regular employment shall be provided

8.1 Work performed must, wherever possible, be based on a recognized employment relationship established through national law and practice.

8.2 Obligations to workers under labor laws and regulations arising from the regular employment relationship shall not be avoided through labor-only contracting, sub-contracting, or homeworking arrangements. Such obligations shall not be avoided through apprenticeship schemes where there is no real intent to impart skills or provide permanent employment, nor through excessive use of fixed-term contracts.

9. Inhumane or harsh treatment shall not be allowed

9.1 Physical abuse, disciplinary measures, threats of physical abuse, sexual or other harassment, verbal abuse, or other forms of intimidation are strictly prohibited.

Neiva, July 2025

Marie P. Blot/Marie

INTEGRITY POLICY

Groupe GM Cosmética Portugal is committed to conducting its activities with the highest standards of ethics, integrity, and transparency, ensuring compliance with applicable national and international laws and regulations.

We believe that integrity is the foundation of the trust we build with our employees, customers, suppliers, and society.

Our **Integrity Policy** is guided by the following **Fundamental Principles**:

- **Legality and Compliance**

All actions and decisions must comply with applicable laws in Portugal and in the markets where we operate, as well as with the company's internal policies.

- **Anti-Corruption and Anti-Bribery**

It is strictly forbidden to offer, promise, give, request, or accept any kind of undue advantage with the purpose of influencing business or administrative decisions. The company adopts a zero-tolerance policy toward corruption.

- **Conflicts of Interest**

All employees must avoid situations in which their personal or family interests may interfere with the company's interests. Any potential conflict must be reported immediately.

- **Transparency and Accountability**

The company conducts its operations and decision-making processes with clarity, ensuring traceability and proper record-keeping of all relevant activities.

- **Whistleblower Protection**

We ensure the existence of safe, anonymous, and effective channels for reporting misconduct (in line with Law No. 93/2021 and the European Directive 2019/1937), protecting whistleblowers against retaliation.

- **Social and Environmental Responsibility**

Integrity is also reflected in the respect for Human Rights, environmental best practices, and ethical relations with the community and suppliers.

- **Communication and Reporting Channel**

Any suspected violation of this policy must be reported.

To safeguard the integrity of the organization, we provide a secure and confidential channel for reporting misconduct:

Reporting Channel:

<https://forms.office.com/e/5TQVex6ytM>

QR Code: (available internally)

Neiva, July 2025

Marie P. da Silva