

CODE OF ETHICS AND CONDUCT

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1. Introduction

1.1. Our Commitment

Making scents, caring for people and planet.

This is our **purpose**, and it stems from the **family values** that guide our corporate governance model: **ethics, integrity, transparency, responsibility and social commitment**. It is not just a statement; it is a way of acting. We are convinced that fulfilling this purpose requires behavior that consistently reflects the principles and values we share. This behavior must be based on **mutual respect, commitment to our work and to the company, responsibility, solidarity and cooperation, integrity, and compliance with the law**.

The members of the executive team, including the Board of Directors and the Management Team, make a clear commitment to this Code of Ethics and Conduct, and to promoting a culture of integrity and compliance throughout the organization. It is our responsibility to lead by example, ensure its effective implementation and foster an environment where ethical conduct is a natural part of the way we work.

For all of us who are part of the EUROFRAGRANCE Group, **ethics and integrity** must be fundamental principles. We must commit to upholding, respecting and protecting basic labor rights, as well as the human rights and civil liberties recognized in the **Universal Declaration of Human Rights**, and to ensuring compliance with the **Ten Principles of the United Nations Global Compact**.

We want to continue fostering an atmosphere of confidence that enables personal and professional growth, free of all forms of offence, exploitation, intimidation, harassment or discrimination.

1.2. Definition and purpose of this Code

The Code of Ethics and Conduct of the EUROFRAGRANCE Group establishes the set of principles, rules and values that guide the behavior of employees, executives, advisors, members of the Board of Directors and other stakeholders.

This document clearly defines the **ethical and professional standards** to be followed by all of us who are part of the group in the performance of our professional responsibilities. The Code aims to ensure ethical and responsible conduct, promoting a corporate culture that respects human rights and values diversity and inclusion.

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It also establishes the **principle of due diligence** in the prevention, detection and eradication of any inappropriate behavior, by implementing specific protocols and procedures to effectively manage such situations.

Finally, it incorporates the principle of **Corporate Criminal Liability** as established in the Spanish legislation applicable to the EUROFRAGRANCE Group, which prevents and prohibits behaviors that could result in liability for the group's companies through the actions of their legal representatives, directors or any other employee.

1.3. Scope

Our Code of Ethics and Conduct applies to **all individuals who maintain a professional relationship with any of the companies within the EUROFRAGRANCE Group**. It establishes clear guidelines to help steer our daily decisions and actions.

All members of the Board of Directors and the Management Team, as well as any representative of the group, must know and fully understand the Code and are formally bound to comply with it.

While his Code cannot cover all the situations that may arise, it provides **essential criteria** to support ethical decision-making. **Any specific and justified exception** to the Code must be authorized solely by the **Compliance Committee**, which will promptly and immediately inform the Management Team and the Sustainability and Compliance Commission.

1.4. General principles

All behaviors detailed in Section **2.- Standard of Conduct of the EUROFRAGRANCE Group**, including those related to the company and the **workplace environment**, the use of **resources, financial matters**, the **business environment, corporate governance, social commitment**, and **environmental impact**, as well as conduct **outside the workplace**, shall be governed by the following general principles:

- **Commitment to Fundamental Rights:** We declare our commitment and adherence to the Fundamental Rights recognized in the Spanish Constitution, such as the right to equality and non-discrimination, freedom of thought and opinion, association, self-expression, privacy, personal dignity, image, confidentiality of communications, and the dignity of our employees.
- **Good Governance:** We are committed to abiding the national and international recommendations on good governance, as well as to the principles of corporate social responsibility, ethics and transparency in all our areas of activity.

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- **Commitment to sustainability:** We will act with integrity and respect toward society and the environment. We will promote practices that support equality and inclusion, and we will consider the impact that business decisions may have on people and the environment. Our decisions will always prioritize the common good over individual or corporate self-interest.
- **Commitment to quality and continuous improvement:** We are continuously committed to our project, striving to maintain and strengthen our enthusiasm and belief in what we do, and in our attitude toward continuous improvement. We aim to integrate ethical values and a pursuit of excellence in the services we provide.
- **Equal opportunities:** We guarantee equality between men and women in recruitment, training, promotion and working conditions, with no form of discrimination.
- **Relational integrity:** All those who engage in a relationship with us must conduct their activities in accordance with the highest ethical standards, act with honesty and inspire trust.
- **Personal, family and professional life balance:** We respect the personal and family lives of our employees. We promote measures that help them balance personal and professional responsibilities, and we are committed to ensuring the digital disconnection right.
- **Occupational Health and Safety:** We promote occupational health and safety as an essential part of our operations. We implement preventive measures to ensure safe and healthy work environments, and we provide training for our employees to safeguard their health and well-being.
- **Transparency:** We act with transparency in all our business relationships and in our dealings with public administrations, providing accurate, truthful and useful information about our commercial and financial activities.

1.5. Commitment to Ethics and Legal Compliance

We ensure **compliance with all legal and regulatory requirements**. Our commitment to legality and ethical principles is reflected in the **implementation of the Crime Prevention Model**, which is aligned with this Code of Ethics and Conduct. This Model not only establishes policies and standards to prevent criminal activities but also serves as a **key channel for reporting potential breaches** of the established standards of conduct.

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It is our **collective responsibility** to adopt a collaborative and accountable attitude in **identifying actual or potential violations** of the rules of conduct and ethical principles set out in this Code, and to **report them to the appropriate authorities** so that the issue can be addressed; thus we strengthen a **culture of compliance and accountability**, ensuring the ongoing validity and effective application of this Code.

2. Standard of Conduct of the EUROFRAGANCE Group

2.1. Conduct related to the Company and Work Environment

2.2.1. Professional relationships

At the EUROFRAGANCE Group, we consider **respect for all individuals and their dignity** to be a fundamental value in our actions. We fully adhere to the Universal Declaration of Human Rights adopted by the United Nations in 1948 and all the instruments derived from it.

To this end, we **commit** to:

- Complying with all applicable laws and regulations.
- Promoting a respectful and inclusive work environment, rejecting any kind of harassment, discrimination, intimidation or inappropriate behavior.
- Ensuring workplace safety through proper equipment, effective procedures and safe working environments.
- Promoting equal treatment and equal opportunities in recruitment, training, promotion, and compensation, by ensuring objective procedures based on professional merit, and avoiding any situation of discrimination or inequality due to birth, race, social or sexual status, marital status, religion, union affiliation or any other personal or social circumstance.
- Promoting a work environment that supports a healthy balance between professional and personal responsibilities, and ensuring the right to disconnect from digital communications outside of working hours.
- Ensuring that all individuals we hire are over the age of 18.

At the EUROFRAGANCE Group we **actively encourage the participation of our employees** in achieving the Group's strategic objective, thus enhancing their personal and professional development. Therefore:

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- We clearly communicate the company's overall objectives as well as the specific goals of each position.
- We expect dedication, efficiency and responsible use of working time, encouraging individual growth.
- We require personal commitment to continuous professional development, which we support through the ongoing updating and sharing skills and knowledge.

Our professional relationships must always be based on **respect, dignity, collaboration and effective communication**. We are responsible for ensuring that our actions align with the Group's and our clients' interests, and for avoiding both actual and potential conflicts of interest.

2.1.2. Combating Harassment

At the EUROFRAGRANCE Group, we are committed to **maintaining a work environment free from harassment** of any kind, as well as from offensive or disrespectful conduct. We comply with all applicable laws and regulations, and also we formal **Anti-Harassment Protocol** in place.

Although the legal definition of harassment may vary in each jurisdiction, we consider **unacceptable any action that creates an intimidating, hostile or offensive atmosphere**, including but not limited to:

- Sexual harassment, gender-based harassment, and harassment based on sexual orientation or gender identity.
- Moral or workplace harassment
- Offensive language or jokes.
- Defamatory comments regarding race, ethnicity, gender, sexual orientation, gender identity or religion.
- Derogatory remarks.
- Intimidating or threatening behavior.
- Hostility towards others based on individual characteristics.

We are all responsible for ensuring that our actions and behavior contribute positively to the workplace atmosphere, and for avoiding any kind of harassment, regardless of intent.

If anyone perceives, experiences or witnesses conduct that could constitute harassment, they have both the **right and the obligation** to report it through the steps outlined in the Anti-Harassment Protocol.

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2.1.3. Work-Life Balance

We recognize that the **holistic development of our employees** benefits both individuals and the organization. To this end, we promote measures that support a **healthy balance between professional and personal life**.

It is everyone's responsibility to respect the privacy of colleagues and to ensure that they can fully benefit from the measures established by the company to support this balance. We comply with Spanish legislation regarding working hours, overtime, digital disconnection and compensation, and we align with the applicable Collective Bargaining Agreement and labor regulations in every country where we operate.

All the personnel of the EUROFRAGANCE Group are expected to collaborate in the **strict observance** of all **applicable labor regulations**, and to actively contribute to the prevention, detection and elimination of any non-compliance.

2.1.4. Occupational Health and Safety

Our **Occupational Risk Prevention Plan** aims to ensure **safe and healthy working environments** for all employees. **We are all responsible** for strictly complying with the established occupational health and safety standards, safeguarding both our own safety and that of others.

In addition, **any situation that may pose a risk to health or safety** must be **reported immediately** through the designated reporting channels.

At the EUROFRAGANCE Group, we enforce a strict **zero-tolerance policy regarding the use of illegal substances, drugs or alcohol during work hours** or in any circumstance that may impair professional performance. Breach of this policy may result in justified dismissal.

2.2. Conduct related to resources

2.2.1. Protection and appropriate use of Company Assets

All employees must make **responsible use of the assets and facilities** provided by the EUROFRAGANCE Group, taking care of them and using them solely for their intended purposes. We must **protect these resources** from misuse or fraudulent activity by third parties, thereby avoiding any potential harm to the Group's reputation or finances.

Employees should be aware that **documents and data stored on the EUROFRAGANCE Group's information technology systems and equipment** may be subject to **review** by the relevant

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internal departments or third parties designated by the company, whenever deemed necessary and in accordance with applicable regulations.

2.2.2. Confidential information

In the course of our work, we may have access to **confidential or sensitive information** about the company, clients, suppliers or third parties. Such information must **always be treated as confidential** unless explicitly stated otherwise or if it has already been made public. Appropriate and necessary **precautions** must be taken to **protect** all confidential information related to the EUROFRAGANCE Group.

In general, all professionals are required to **maintain professional secrecy** regarding any information and data provided by the EUROFRAGANCE Group, even after the termination of our employment relationship with the company.

Employees must not use or disclose privileged information obtained through our work at the EUROFRAGANCE Group to third parties. Such information must never be used for personal gain or for the benefit of any third party.

The **Confidentiality Policy** outlines the situations in which information may be shared, either with express authorization or through confidentiality agreements.

2.2.3. Information Security and Data Protection

All individuals who maintain a professional relationship with the EUROFRAGANCE Group must **comply with applicable regulations** regarding **Information Security**. To this end, we have **internal protocols** in place concerning the use of IT resources, data protection, and security breaches.

We must **strictly respect the privacy of any personal data** we access, whether it pertains to clients, employees, contractors or any person or entity with whom the EUROFRAGANCE Group maintains a contractual or other type of relationship. Moreover, we must ensure the proper use of such data in accordance with **internal procedures** for storage, handling and access, in order to guarantee the appropriate levels of security required by the nature of the data.

Any incident involving information security or the protection of personal data must be reported immediately to the relevant department.

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2.2.4. Intellectual and Industrial Property Protection

At the EUROFRAGANCE Group, we are committed to **protecting both our own intellectual property** and that of third parties. Intellectual property rights are invaluable assets and must be safeguarded and respected both internally and externally. This category includes, but is not limited to: copyright, reproduction rights, trade secrets, know-how, transmission rights, and related reproduction rights.

At the EUROFRAGANCE Group we are **committed to the proper use of the trademarks** (name and logotype) of the companies within the group, ensuring they are never associated with content that is offensive, defamatory or degrading.

Any intellectual creation resulting from work performed within the company **belongs to the EUROFRAGANCE Group**. Protected assets must only be used with express authorization or the appropriate license. It is strictly prohibited to copy, publish or reproduce such assets without the necessary usage rights.

We must ensure that all intellectual assets are used correctly and that proper credit is given to sources and authors when required.

2.3. Conduct related to finances

2.3.1. Recording of transactions

All financial transactions carried out by the EUROFRAGANCE Group must be **recorded** clearly, accurately and completely **in the system**.

At the EUROFRAGANCE Group we are committed to **implementing and maintaining an appropriate internal control system** to prepare financial information and ensure its **regular review** by the Management Team, the Audit Committee and external auditors.

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2.3.2. Ethics in Financial Reporting

At the EUROFRAGANCE Group we will **provide complete, fair, accurate, understandable and timely financial information** in our public reports, in compliance with applicable laws and accounting standards. It is strictly **forbidden to alter, destroy or manipulate** accounting records and financial documents, as well as to engage in fictitious or fraudulent transactions.

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Any vulnerabilities in our internal control mechanisms identified by employees or third parties must be **reported and addressed** promptly.

2.3.3. Principles of Financial Integrity and Responsibility

All **financial resources** must be managed with **efficiency, transparency and accountability**. The **misuse of funds, unnecessary expenses or diversion of resources for personal purposes** is strictly prohibited.

Any situation that could result in a conflict of interest in financial decision-making must be proactively disclosed and avoided.

We are committed to **complying with applicable tax and accounting regulations** in all countries where we operate, and to facilitating the work of both internal and external auditors.

2.3.3. Principios de integridad y responsabilidad financiera

La información financiera será tratada con la debida **confidencialidad**, protegiéndola frente a usos no autorizados.

Cualquier **sospecha de irregularidad, fraude o mala práctica** deberá ser **comunicada de inmediato** a través del canal de denuncias habilitado por el Modelo de Prevención de Delitos.

2.3.4. Other Responsible Financial Practices

At the EUROFRAGRANCE Group we promote financial management aligned with **ethical, legal and sustainable principles**. We implement specific measures to **prevent money laundering and the financing of terrorism**, ensuring that all our operations comply with applicable regulations and are fully traceable.

Corporate expenses must be properly justified, recorded and aligned with internal procedures. The use of company resources for personal or unauthorized purposes is strictly prohibited.

Donations, sponsorships or contributions must receive **proper approval**, ensuring legality and avoiding any perception of undue influence. Political contributions will only be made with the express authorization of the Board of Directors.

The EUROFRAGRANCE group firmly **rejects** any form of **bribery, kickbacks or financial incentives** that could compromise the impartiality of business or administrative decisions.

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All **financial assets** must be **used responsibly**, in accordance with defined corporate purposes. A risk-control culture will be promoted, including the evaluation of exposure to liquidity, credit, foreign exchange, or defaults.

The **oversight of these practices** is an integral part of our ethical commitment, and must guide the conduct of everyone involved in the company's financial management.

2.4. Conduct related to the Business Environment

2.4.1. Relationship with clients

We place our clients **at the heart of our organization**, and aim to build **long-term relationships** based on **mutual trust**.

We are committed to offering **high-quality products and services, personalized and tailored** to their needs, with **transparency** and clarity. We **do not tolerate any form of discrimination** in our interactions with clients, nor do we offer benefits or advantages to certain clients at the expense of others.

We strive to provide the **best possible service**, making **client satisfaction** a top priority. All employees are required to act with **consideration, respect and dignity** in client relations, acknowledging cultural sensitivities and ensuring there is **no discrimination** prohibited by law on the basis of race, religion, age, nationality, gender, sexual orientation or any other personal or social condition, with particular attention to individuals with disabilities.

We are also responsible for ensuring the security of payment methods used within the EUROFRAGANCE Group to guarantee proper operation and traceability of billing and collection procedures, protect client data and prevent fraud.

We are particularly committed to the following areas, which we consider of the utmost importance:

- **Confidentiality Commitment:** At the EUROFRAGANCE Group we only collect the data necessary to carry out our activities, and we are fully committed to, in any case, respecting and safeguarding individuals' rights to privacy, confidentiality and data protection, in full compliance with legal obligations.
- **Transparency commitment:** We are committed to providing clients with clear and understandable information regarding their operations, as well as commercial proposals (sales conditions, pricing, regulatory requirements, etc.) related to the contracting of produces and services.

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2.4.2. Relationship with Suppliers

We consider our suppliers an essential part of our business. Therefore, we maintain **transparent and ethical relationships** with them, promoting equal opportunities, mutual respect and shared benefit. We select our suppliers based on objective criteria, ensuring compliance with our ethical, labor and environmental standards, in accordance with our **Supplier Code of Conduct**, which all suppliers must adhere to.

All our sourcing decisions are made in accordance with internal procedures and must be justified and transparent, while protecting sensitive information related to our supply chain.

All the EUROFRAGANCE Group employees must interact with our suppliers of goods and services in a lawful, ethical and respectful manner.

When participating in supplier selection processes, procurement of goods or services, or negotiation of rates and conditions, individuals must **act impartially**, avoiding any interference of situation that could compromise the objectivity and transparency of the process.

During the standardization, selection and contracting of suppliers, we promote competition and comparison between different offers, in order to ensure the best conditions and to foster **fair and efficient procurement practices**.

2.4.3. Relationship with Public Authorities

Relationships with authorities, regulatory agencies and public administrations must be based on the principles of **cooperation and transparency**.

All the employees of the EUROFRAGANCE Group must interact with public authorities and institutions in a lawful, ethical and respectful manner, and in full compliance with national and internal regulations on the prevention of corruption and bribery. Employees who engage with representatives of public administrations must be familiar with the EUROFRAGANCE Group's **Anti-Fraud and Anti-Corruption Policy**, as well as the **Policy on Inspections and Regulatory Inquiries**.

Under no circumstances may any form of improper benefit be offered or accepted to influence public or private decisions, nor may any conduct be engaged in that could give rise to the appearance or suspicion of fraudulent behavior.

Employees **must refrain from seeking undue tax advantages** for the EUROFRAGANCE Group and we must ensure that all information submitted to tax authorities is accurate and faithfully reflects the Group's actual situation. Likewise, any public grants or subsidies requested or received must

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be used appropriately and for their intended purposes. All applications must be submitted transparently, without falsifying eligibility conditions.

The use of company funds or assets for any unlawful or improper purpose is strictly prohibited.

2.4.4. Gifts and hospitality

In the context of business relationships, a gift is understood as any item of value given or received openly and transparently as a token of appreciation. Hospitality refers to any courtesy, typically of a social nature, offered or received in the context of business interactions.

Gifts and hospitality may be accepted or offered in accordance with our **Anti-Fraud and Anti-Corruption Policy**, under strict conditions: transparency, legality, no improper intent, no conflict of interest, and always of moderate value (up to 100€). In no case may they involve cash, gift cards or any other form of monetary transfer.

Additionally, whenever a gift is exchanged, regardless of who gives or receives it, or its value, we must **send an e-mail to the Compliance Committee**, stating the name of the giver, the recipient, and the content and value of the gift.

Inappropriate gifts must be declined and reported to the Compliance Committee. If returning the gift is not reasonably feasible, it must be handed over to the department responsible for Corporate Social Responsibility, which will issue the corresponding invoice and donate it to a charitable organization.

Any questions regarding the interpretation or the context of a gift, whether given or received, must be submitted in writing to the Compliance Committee. The Committee is responsible for answering all inquiries and determining whether a gift is appropriate.

2.4.5. Market Practices

At the EUROFRAGANCE Group we are fully committed to complying with all applicable **Competition and Antitrust Laws**. We reject any practices that unfairly restrict competition or mislead consumers or competitors, such as price fixing, bid rigging, or market and client allocation.

It is strictly prohibited to intentionally discredit competitors, promise services we cannot deliver, or make unverified claims about the inability of other group members to provide certain services.

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We strongly support **free competition** and fair conduct in the marketplace. Accordingly, we do not tolerate practices such as:

- Illegally obtaining information about products or tenders.
- Price-fixing or other agreements between competitors.
- Dissemination of fake or misleading information about competitors.
- Fake advertising or any unlawful restriction of competition.

Price and sales policies must be defined independently and without any coordination with competitors. Customers should be won solely through fair competition.

All employees, especially those involved in commercial activities or who are in frequent contact with competitors, must be familiar with applicable competition laws, and consult their supervisors in case of doubt.

The EUROFRAGANCE Group strictly rejects any dishonest, fraudulent or malicious conduct. Employees may only obtain commercial information through ethical and lawful means and must not disclose trade secrets, especially when joining from other companies in the industry.

The dissemination of false information about competitors is also prohibited. In business dealings with third parties, payments in cash must be avoided and special attention must be given to unexpected payments, non-standard accounts, transfers to tax havens or to entities or non-transparent ownership structures.

2.4.6. False advertising

In the EUROFRAGANCE Group we use advertising as a useful tool within the economic process, always ensuring **respect for advertising ethics** and for the rights of the target audience. We are committed to providing truthful information and **avoiding any form of misleading advertising**, without prejudice to the legitimate defense of professional interests.

Likewise, any kind of comment that may incite hatred through corporate communication channels is strictly prohibited.

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2.5. Conduct related to Corporate Governance, Social Commitment and Environmental Impact

2.5.1. Corporate Governance

Shareholders and directors of the EUROFRAGANCE Group commit to **ethical, transparent, and responsible governance** as a fundamental pillar for achieving our institutional and social objectives.

We observe strict principles of **due diligence**, ensuring that all decision-making processes are carried out with the utmost rigor, prudence and respect for the rights of all stakeholders.

We fully comply with all applicable national and international legislation and incorporate standards and best practices that promote a **culture of integrity, legality and sustainability**.

Accordingly, we pay particular attention to the prevention of money laundering and the financing of terrorism, applying effective internal controls and procedures for identifying, assessing and managing risks in line with the applicable regulatory framework. Any suspicion or risk arising in our business or financial operations will be examined by the Compliance Committee.

Our commitment to sound governance enables us to prevent risks, build trust and foster strong relationships with all our stakeholders, thereby strengthening the sustainability and legitimacy of our actions.

2.5.2. Social Commitment

The **Social Impact** strategy of the EUROFRAGANCE Group arises from a direct manifestation of our core purpose: “**Making scents, caring for people and the planet**”. This motto not only expresses our passion for developing exceptional fragrances, but also underlines our **strong commitment to social well-being, equity and sustainability**.

As a company operating across multiple geographies, we are committed to conducting our activities in a responsible manner that not only ensures the long-term sustainability of our organization but also contributes positively to the **development of the communities where we operate**, creating a lasting and meaningful impact.

Our social impact actions focus on three key priority areas:

1. **Childhood:** We support programs aimed at protecting children by promoting nutrition, education and hygiene. In addition, we endorse initiatives that empower women through education, viewing it as a catalyst of social change.

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2. **Health:** We actively participate in projects that promote the health and well-being of communities. We explore how our fragrances can contribute to emotional and physical well-being, incorporating these benefits in innovative ways into our health-related initiatives.
3. **Culture:** We promote projects that position culture as a fundamental driver of development and social cohesion. We firmly believe that culture is a pillar of collective progress and support its advancement in all its forms and expressions.

We implement and develop such commitment in accordance with our **Social Impact Policy**, which outlines:

- The percentage of financial resources systematically allocated to social initiatives, as part of our annual planning.
- The selection and evaluation criteria for partner projects and organizations.
- Monitoring, control and impact measurement mechanisms which ensure transparency, traceability and effectiveness of our contributions.

We also promote **employee volunteering** and collaboration with social, cultural, and civil society organizations as a way to generate shared value, strengthen our ties with local communities, and progress towards a **fairer, more inclusive, and more sustainable business model**. These actions aim to maximize positive impact, and build long-term relationships based on trust and mutual respect.

2.5.3. Environmental Impact

At the EUROFRAGRANCE Group, we recognize the urgent global need to act responsibly in the face of **environmental challenges**. Our entire organization shares a commitment to doing the right thing from both an ethical and ecological perspective, embedding sustainability as a cross-cutting principle throughout our operations.

As a fragrance house, our **bond with nature** is essential. That is why **protecting the natural resources** from which our ingredients originate and reducing the environmental impact of our activities are key priorities, as outlined in our **Sustainability Policy**.

Our environmental ethics are reflected in the following commitments:

- **Responsible supply chains:** We only work with raw materials suppliers who, directly or indirectly, respect the land and ecosystems from which our natural ingredients are sourced.

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- **Climate action:** We are aware of how climate change affects natural ingredient harvests, which reinforces our determination to protect the planet.
- **Sustainable production:** Across all our manufacturing sites, we continuously seek ways to increase efficiency and reduce our ecological footprint by optimizing the use of raw materials and energy, and by minimizing waste generation.
- **Waste and emissions management:** We pay close attention to the proper management of hazardous waste, contaminated packaging and liquid discharges. We measure and monitor our carbon footprint with the support of independent experts and assess the impact of transportation across our products life cycle.
- **Regulatory compliance and prevention:** No environmental incidents or penalties were recorded during the reporting period. We have implemented preventive measures, such as decantation systems to improve wastewater treatment, and regularly conduct environmental emergency drills.
- **Certifications and continuous improvement:** In Spain our operations are managed under certified systems in accordance with ISO 14001, and significative impacts such as consumption, emissions, noise or waste are annually assessed.
- **ESG Risk Management:** In collaboration with external consultants, we conduct specific assessments of environmental contingencies, periodically updating risks and assigning clear responsibilities for their control and mitigation.

These actions are not only part of our environmental management system, but also reflect our corporate ethics: operating with **environmental awareness**, respecting our surroundings, and playing an active role in addressing current environmental challenges.

2.6. Conduct outside the Workplace

2.6.1. External Activities and Involvement

Employees of the EUROFRAGANCE Group may engage in work or professional activities other than those performed within the EUROFRAGANCE Group, provided that these do not affect the expected level of performance or interfere with the development of their duties. If such activities may impact working hours, prior authorization from the direct supervisor is required, who must inform P&O and the Compliance Committee.

Management positions require exclusive dedication. However, the P&O Department may authorize exceptions for activities related to family matters, teaching, or unpaid charitable work, provided that these do not give rise to conflicts of interest with the activities of the EUROFRAGANCE Group. In case of doubt, the P&O Department shall consult with the Compliance Committee.

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The EUROFRAGANCE Group maintains **political neutrality** and conducts its business without interfering in the political life of the communities in which it operates. Its relationships with governments, authorities, institutions, and political parties are always based on the principles of legality and neutrality.

Any contribution, whether financial or in kind, to public or political entities must comply with applicable legislation, ensure transparency, and be supported by a favorable report from the Compliance Committee confirming its legality.

Employees may participate in legally recognized political activities, provided that they do so in a personal capacity, outside working hours and outside any EUROFRAGANCE Group facilities, and without associating their image with the company.

2.6.2. Conflicts of Interest

Employees of the EUROFRAGANCE Group must avoid situations that may lead to a conflict between their personal interests and those of the Group. They must also refrain from representing, influencing, or participating in decisions in which they, or a related third party, have a direct or indirect personal interest, and must not use their position to obtain personal or commercial benefits.

The following situations are considered potential conflicts of interest and must be reported to the Compliance Committee:

1. Carrying out activities, directly or indirectly, that are identical, similar, or complementary to those of the EUROFRAGANCE Group, whether on one's own behalf or through third parties.
2. Maintaining commercial relationships with the Group (exchange of goods or services), either personally or through related parties.

All professional decisions must be free from undue influence. In the event of a potential conflict of interest, employees must:

- Refrain from participating in the affected negotiation or transaction.
- Immediately inform their direct supervisor, who will decide how to proceed and document the decision in a report to be submitted to the Compliance Committee.

2.6.3. Use of Information, Image and Corporate Resources

In activities carried out outside working hours, all employees must:

- Respect the intellectual property of the Group (manuals, systems, projects), as well as all work, tasks, and projects in general.

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- Comply with the protocols, policies, and controls established by the organization to ensure adherence to international requirements and best practices.
- Where applicable, clearly state their personal capacity when participating in external political, institutional, or associative activities. In such cases, employees must act in a way that makes their exclusively personal involvement clear, in order to prevent the organization from being perceived as involved.
- Refrain from disclosing Group information to third parties or the media without authorization, referring any such requests to the Communications Department.
- Not use the Group's image, name, or trademarks in registrations, social networks, or online forums. Opinions expressed in these spaces must be clearly identified as personal and must not compromise the company.

3. Compliance with the Code of Ethics

The EUROFRAGANCE Group has a **Compliance Committee** responsible for ensuring compliance with this Code of Ethics and with applicable regulations. This body acts as the Internal Control Body (ICB) and reports to the Board of Directors through the **Sustainability and Compliance Committee**.

The Committee ensures the **proper dissemination and implementation** of the Code among all employees, handles queries, interprets its application when doubts arise, and receives any information related to potential breaches. It also oversees the management of the **Whistleblowing Channel**, designed to report violations or well-founded suspicions of breaches of the Code or other internal regulations.

All communications received are handled in accordance with the **Whistleblowing Channel Protocol**, which guarantees the confidentiality of the reporting party and the absence of retaliation against those acting in good faith. The Committee also ensures that any investigation process fully respects the right to be heard and the presumption of innocence of the individuals involved.

The Compliance Committee may act on its own initiative or at the request of any individual with a legitimate connection to the organization, whether an employee, supplier, or third party. To carry out its functions effectively and independently, it must be provided with adequate resources as well as the necessary legal support.

All employees have **both the right and the obligation to report any potential breaches** of this Code or of the EUROFRAGANCE Group's internal regulations committed by other employees or

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collaborators. This channel may also be used to report suspicions or indications of risks related to potential violations of this Code.

4. Communication of the Code

The Code will be provided to all employees in their native language or, where this is not possible, in one of the working languages of the EUROFRAGRANCE Group companies, namely Spanish or English. It will always be published on the **corporate portal and the company website** and will be made available to new employees as part of the **onboarding documentation**.

The Code will also be subject to appropriate communication, training, and awareness initiatives to ensure that it is understood and effectively implemented throughout the organization.

5. Change Log

CHANGE LOG			
VERSION	DATE	SCOPE	CHANGES
1 st	11/6/2018	Entire Document	Creation
2 nd	16/3/2022	Entire document	Inclusion of Corporate Criminal Advisory as external manager of the Internal Information System. Adaptation to the draft law regulating the protection of persons reporting regulatory breaches and combating corruption, transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

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Code of Ethics and Conduct

Version: 5

Date: 10/06/2025

3 rd	25/7/2022	Entire document	Format update to new branding and update of Committee members
4 th	13/3/2024	Section 4	Detailed composition of the Standard Committee
5 th	10/6/2025	Entire document	Review

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