



CODE OF ETHICS

Index

1. INTRODUCTION	3
2. OBJECTIVES AND RECIPIENTS	3
3. PRINCIPLES AND VALUES	3
3.1. Legality, Honesty and Integrity	3
3.2. Excellence and Reliability	4
3.3 Environmental Responsibility	4
3.4. Responsibility Towards Individuals and the Value of Diversity	4
4. SMART SUSTAINABILITY: A Skincare That Cares	4
5. RULES OF CONDUCT	5
5.1. Conflict of Interest	5
5.2. Traceability and Transparency	5
5.3. Product compliance	5
5.4. Animal Testing	6
5.5. Relationships with Customers	6
5.6 Relationships with Suppliers and Other External Collaborators	6
5.7. Gifts and Gratuities	6
5.8. Anti-Money Laundering	6
5.9. Fair Competition	7
5.10. Protection of Company Assets and Equity	7
5.11. Pursuit of Sustainability Objectives	7
5.12. Personnel Selection and Management	8
5.13. Remuneration	8
5.14. Harassment and Mobbing	8
5.15. Health and Safety at Work Protection	8
5.16. Internal Organization	9
6. IMPLEMENTATION	9
7. DISCIPLINARY SYSTEM AND SANCTIONS	10

1. INTRODUCTION

This document, named "**Code of Ethics**," governs the set of values and behavioral rules that Skinlabo S.R.L., with its legal headquarters in Turin at Corso Galileo Ferraris 22 Bis, VAT no. 11541460017, registered at the Turin Companies Register under no. REA TO - 1221309, in the person of its current legal representative (hereinafter referred to as "**Skinlabo**" or the "**Company**"), commits to in the exercise of its business activities.

SkinLabo is an Italian skincare brand, established in 2016, known for its ability to target specific skin problems effectively. Its range includes a wide selection of products (about 70) dedicated to skin care.

Originally distributed online only, the brand now expands its presence through both online distribution and partnerships with high-level specialized retailers.

SkinLabo defines itself as "The Skincare that cares." This concept of "caring" is concretely translated into the focus SkinLabo maintains on the efficacy and safety of its products, on transparency in clear and honest communications about its products and services, and on a commitment to environmental protection and the well-being of people.

In addition to being a completely "Made in Italy" product, SkinLabo stands out for also being "made with integrity." The company consistently conducts its activities responsibly, continually seeking to improve its environmental and social impacts.

2. Objectives and Recipients

The Code of Ethics is a mutual promise that binds Skinlabo to all its stakeholders. By adopting the Code of Ethics, Skinlabo aims to ensure that anyone within the Skinlabo universe feels part of an environment imbued with well-being and respect for all.

The Skinlabo Code of Ethics requires Administrators, Auditors, employees, collaborators, suppliers, business partners, and all those who operate in the name and on behalf of Skinlabo (hereinafter referred to as the "**Recipients**") to adopt standards of behavior capable of integrating business activities with the protection of the interests of all individuals who come into contact with the Company, as well as the environment in which it operates.

Skinlabo has embarked on a journey to improve both its own activities and those of its business partners in terms of environmental, social, and economic sustainability. Skinlabo's commitment to Environmental, Social, and Governance (commonly known as "**ESG**") issues is reflected in its founding values and guiding principles, as well as in its sustainability goals and its intent to create shared value for and with all involved stakeholders, guiding the Company in the conduct of its activities.

3. PRINCIPLES AND VALUES

3.1. LEGALITY, HONESTY, AND INTEGRITY

Skinlabo and its stakeholders act in full compliance with the laws in force in the countries where they operate, as well as with community and international regulations and standards. Under no circumstances can the pursuit of Skinlabo's interest or advantage justify dishonest and/or illicit conduct.

In cases of uncertainty regarding the correct interpretation of the aforementioned regulations, the Recipients should seek the opinion of the competent company bodies, which may also make use of experts and legal consultants external to the Company.

3.2 EXCELLENCE AND RELIABILITY

Skinlabo is committed to developing and marketing products that combine the high quality of raw materials and "Made in Italy" manufacturing with product safety, guaranteed by various tests that ensure skin compatibility. Furthermore, in line with its customer-friendly approach, the brand pays special attention to transparency towards consumers, enabling them to make informed and targeted choices when purchasing products.

3.3. ENVIRONMENTAL RESPONSIBILITY

"The Earth was not given to us by our fathers, but loaned to us by our children."

Nature provides most of the raw materials used to formulate Skinlabo products. For this reason, we respect it and are indebted to it. Skinlabo's commitment to Nature is aimed at supporting and encouraging responsible production and consumption practices.

For this reason, our business partners are also constantly encouraged to improve their environmental performance in relation to the management of emissions, waste, consumables, and energy and water resources.

3.4. RESPONSIBILITY TOWARDS INDIVIDUALS AND THE VALUE OF DIVERSITY

Skinlabo respects the fundamental rights of individuals, safeguarding their moral integrity and ensuring equal opportunities. In both internal and external relationships, behaviors that involve discrimination based on age, culture, ethnicity, nationality, religious belief, political opinion, marital status, pregnancy status, gender, sexual orientation, gender identity and/or expression, and health conditions are not permitted.

Skinlabo condemns any activity that could lead to the exploitation and/or subjugation of any individual and recognizes the primary importance of protecting minors and suppressing all forms of child labor. Skinlabo ensures equal opportunities for personal growth and professional development, committing to creating a fair work environment and fighting against all forms of discrimination. For Skinlabo, interactions between people must be guided by the values of dignity and respect. The Company does not tolerate any form of harassment and/or disturbance towards employees, business partners, and third parties in general.

Skinlabo acknowledges its responsibility for the influence that its actions and choices can have, and for this reason, it pays particular attention to the implicit and explicit content it conveys, ensuring that it respects the diversity of its audience, promotes real well-being for people, and contributes to a healthy idea of beauty and the perception of individuality.

4. Smart sustainability: a skincare that cares

Defining itself as "*A Skin Care that Cares*," Skinlabo is committed to spreading a culture of responsibility within its organization, towards its supply chain, and also towards the consumer.

The ESG paradigm is the core of the modern concept of sustainability, and on these grounds, Skinlabo is managing its development strategy by focusing on criteria through which the company's commitment to sustainability can be verified, measured, and concretely supported. It's not just an ethical issue, but a real purpose of the company: to operate in a responsible, sustainable, and transparent manner, promoting the achievement of a Responsible Consumption and Production goal (SDG12).

Sustainability in Skinlabo's business activity is a concept that is not limited exclusively to sensitivity to environmental protection issues (environment), but also extends to the interaction between the business conducted and the social context (social), and to the ability of the managing bodies to reserve appropriate spaces for Corporate Responsibility in the board's activity (governance).

Since 2022, Skinlabo has voluntarily published a Sustainability Report to maintain transparency and demonstrate the achievement of its set goals.

The goals will be reviewed and prioritized every year with an inclusive process involving all major stakeholders: executive team, management, workers, shareholders, business partners, and customers who wish to participate. In keeping with the principle of transparency, Skinlabo intends to make its Sustainability Report accessible on its website.

5. Rules of Conduct

5.1. CONFLICT OF INTEREST

In conducting its activities, the Company operates according to principles of fairness, loyal collaboration, and transparency towards all market operators.

Recipients must avoid any situation that could place them in conflict with the interests of Skinlabo. A conflict of interest refers to any circumstance where the Recipients have an interest different from that of Skinlabo.

It is forbidden for any Recipient to exploit their position and engage in collusive conduct to gain personal benefits. All forms of pressure on third parties aimed at obtaining a personal advantage or advantage for Skinlabo are also prohibited.

5.2. TRACEABILITY AND TRANSPARENCY

All actions and operations carried out by Skinlabo must be supported by adequate documentary evidence, in order to ensure the verification of the decision-making, authorization, and execution processes.

This evidence must enable, at any time, the performance of checks that attest to the reasons underlying the operation and identify the identity of those who have authorized, carried out, recorded, and verified the operation itself.

The documents attesting to the accounting registration activity must allow for the prompt reconstruction of the accounting operation and the identification of any errors within the individual administrative process. In any case, the financial statements, reports, and social communications required by law must be prepared clearly, transparently, and represent the Company's financial situation accurately and truthfully.

Every operation or transaction must be correctly and promptly recorded in the company's accounting system according to the criteria indicated by law and based on the applicable accounting principles. Each operation or transaction must be authorized, verifiable, legitimate, and consistent with the Company's activities.

It is the responsibility of each employee and/or collaborator of the relevant area to ensure that documentary evidence is easily accessible and organized according to logical criteria and in compliance with the provisions and procedures of the internal business management system.

Skinlabo employees who become aware of omissions, falsifications, or negligence in the accounting records or supporting documentation are required to promptly report it to their immediate superior.

Skinlabo guarantees that stakeholders are always placed in a position to make informed decisions and expects from them that they provide complete, transparent, comprehensible, and accurate information.

Skinlabo recognizes the fundamental value of correct information to shareholders regarding significant facts concerning corporate and accounting management.

5.3. PRODUCT COMPLIANCE

The entire range of products that Skinlabo markets complies with the prescriptions contained in EC Regulation No. 1223/2009 (hereinafter the "**Cosmetic Regulation**").

In particular, all Skinlabo branded products conform to the requirements of the Cosmetic Regulation and also adhere to an internal blacklist that prohibits over 1400 ingredients considered harmful or at least suspicious.

Each reference comes with informative documentation that includes, among other things, a report on the safety of the marketed product.

Skinlabo pays special attention to the regulatory compliance of product labeling.

The products are dermatologically and ophthalmologically tested for nickel and are free from allergens.

The products are tested to verify their effectiveness using a variety of methods. In evaluating efficacy, the Company considers measurable results (clinical tests on products and individual ingredients) and feedback from customers and the internal team (group testing of both consumers and internal).

Each product contains more than 90% of ingredients of natural origin, is dermatologically tested, and is nickel-free.

Skinlabo is committed to creating high-quality products by encouraging research, development, and marketing activities in line with the quality standards pursued.

5.4. ANIMAL TESTING

Skinlabo is committed to environmental protection, which includes respecting animal welfare. Skinlabo does not test any of its products or raw materials on animals and is certified Cruelty Free by PETA.

5.5. RELATIONSHIPS WITH CUSTOMERS

Skinlabo aims for maximum customer satisfaction and is committed to ensuring utmost transparency regarding its services and products to enable informed choices. Moreover, the company is dedicated to providing maximum transparency to its customers concerning formulation choices and the ingredient list, also through a service of simple, comprehensive, and understandable labeling. Special attention is also given to respecting customer privacy in compliance with data protection laws.

5.6. RELATIONSHIPS WITH SUPPLIERS AND OTHER EXTERNAL COLLABORATORS

Skinlabo aims to establish ongoing collaborations and strong, lasting trust relationships with suppliers and other external collaborators, avoiding any corrupt practices.

Skinlabo expressly requires its suppliers and external collaborators to comply with this Code. The remuneration of business partners and other external collaborators is proportionate to the service specified in the relevant contract.

Skinlabo commits to aligning its procurement activities with the Ethical Principles set forth in this Code and therefore selects its suppliers based on criteria of ethics, reliability, good reputation, credibility in the relevant market, and professional integrity, also assessing their ability to operate in an environmentally respectful manner and their product testing methodologies.

The legal relationship with suppliers and other business partners and external collaborators is formalized in writing. Skinlabo requires its suppliers and external collaborators to respect the Principles and Rules of Conduct provided by this Ethical Code.

5.7. GIFTS AND GRATUITIES

Acts of commercial courtesy, such as gifts and free services to third parties, must be evaluated with caution and are only permitted if they are of modest value.

They must not, in any case, be interpreted as a request for favors in return. During the course of employment, every employee and/or collaborator is prohibited from accepting money, gifts, or favorable treatment, whether directly or through third parties.

Any gift or favorable treatment, offered or requested, that goes beyond simple acts of commercial courtesy must be refused, and the incident must be immediately reported to the responsible supervisor.

5.8. ANTI-MONEY LAUNDERING

Skinlabo commits to complying with all national and international regulations and provisions concerning anti-money laundering, particularly adhering to the requirements set out in Legislative Decree No. 231/2007.

Skinlabo's employees and collaborators must not, under any circumstances, receive or accept promises of cash payments exceeding legal limits, or risk being involved in cases related to the laundering of money from illegal or criminal activities.

Furthermore, Skinlabo commits to implementing all necessary precautions and controls to ensure that illicit profits are not reinvested in the company's activities, even if they pertain to the company itself.

5.9. FAIR COMPETITION

Skinlabo believes that fair competition is essential for business development. As such, it competes fairly in the market by adhering to applicable antitrust laws. Skinlabo, through individuals acting on its behalf, does not engage in any conduct that promotes or facilitates business dealings to its own advantage in violation of the law or other existing regulations.

Skinlabo is committed to protecting fair competition by refraining from engaging in anti-competitive, collusive behaviors, or abuse of a dominant position.

5.10. PROTECTION OF COMPANY ASSETS AND EQUITY

Skinlabo provides its employees with the necessary corporate assets and tools for performing their duties and recommends their use in a conscious, responsible manner, always respecting internal procedures and rules of conduct. Any improper use or behavior that is not in compliance with current laws, internal procedures, and rules, which could prejudice the employees themselves and the Company or otherwise compromise their safety, is prohibited. To this end, the Company encourages specific staff training and prescribes rules of behavior, promoting their dissemination. Skinlabo requires its employees to carefully, diligently, and responsibly safeguard all tools and resources, whether tangible or intangible, that are provided by the Company for the performance of work activities, always with the common well-being as a goal and consideration.

Furthermore, to protect the integrity of its corporate assets, unless otherwise provided by law, Skinlabo prohibits:

- Making, outside of cases of legitimate reduction of the share capital, refunds of contributions made by the shareholder or releasing them from the obligation to make them;
- Deciding on the distribution of profits or advances on profits that have not been actually achieved or are intended for legal reserves
- Reducing the share capital, mergers, and divisions in violation of the rules set for the protection of creditors;
- Artificially forming or increasing the company's capital;
- Creating fictitious majorities in the company's assemblies through simulated or fraudulent acts.

5.11. PURSUIT OF SUSTAINABILITY OBJECTIVES

Here is the translation of the text from the corporate ethical code into English:

All personnel are required to conduct every activity with the goal of promoting the pursuit of sustainability objectives set by Skinlabo. To this end, Skinlabo commits to making its objectives clear to its workers so that they can make informed choices conducive to achieving these goals and to spreading a culture supportive of sustainability. Moreover, Skinlabo commits to:

1. Ensuring maximum transparency to its customers regarding formulations, production processes, supply chains, and the socio-environmental impacts related to the marketed products;
2. Designing and producing its products with a focus on minimizing environmental impacts both in the production phase and in use (emissions and the use/disposal of resources), paying particular attention to finding primary and secondary packaging solutions with reduced environmental impact;
3. Spreading and promoting sustainable environmental practices within its supply chain, also supporting its suppliers in the transition;
4. Identifying and planning in advance the activities required by legal prescriptions in environmental matters, with special attention to aspects of energy efficiency and actions aimed at differentiation in collection, recycling, and proper waste disposal
5. Valuing people, focusing on its collaborators, and ensuring they have real opportunities for work and personal growth;
6. Creating and maintaining a work environment where diversity is respected and valued, also by adopting policies aimed at integration.

5.12. PERSONNEL SELECTION AND MANAGEMENT

At Skinlabo, merit and goodwill are the only things that count.

The research and selection of personnel to be hired are carried out respecting the privacy of the candidates and based on criteria of objectivity and transparency, ensuring equal opportunities, and avoiding favoritism.

Personnel are hired with a regular employment contract in compliance with applicable legislation.

Upon hiring and during the initial period of company integration, each worker receives adequate information regarding the norms governing their employment relationship, the norms and procedures for prevention related to health and safety in the workplace, company policies, and the Ethical Code.

Access to particular roles or assignments is also established in consideration of skills and abilities.

Recipients commit to taking responsibility for the tasks assigned to them and to adopt a collaborative and proactive approach in the evaluation process. Skinlabo does not use forced or bonded labor, does not employ workers below the legal age, and respects the norms aimed at protecting children and adolescents (ILO Conventions 29, 105, 138, and 182).

The Company observes the norms aimed at protecting women, equality of treatment and opportunity, as well as provisions for the protection and support of maternity and paternity.

The right of workers to freely associate and bargain collectively is recognized and respected.

In managing relationships that involve the establishment of hierarchical relations, Skinlabo requires that authority be exercised with fairness and correctness, in a collaborative context aimed at growth, and prohibits any behavior that may be harmful to the dignity and autonomy of the employee or collaborator.

5.13. REMUNERATION

The determination and increases in remuneration occur in compliance with current legal norms and ILO Conventions 100 and 111, with clear methods, equitably and communicated transparently to the workers.

Skinlabo ensures compliance with contributory, wage, and fiscal obligations and with legislation concerning labor, as well as the fulfillment of all regulatory obligations aimed at guaranteeing by the employer a lawful stay in the territory of the State for employees from non-EU countries.

Skinlabo does not establish or continue relationships with suppliers who use labor in conditions of exploitation.

5.14. HARASSMENT AND MOBBING

Skinlabo demands that in both internal and external work relationships, there should be no occurrence of harassment or attitudes that can be associated with practices of mobbing, all of which are strictly prohibited.

The following are considered such practices:

- Creating an intimidating, hostile, isolating, or discriminatory work environment against individual workers or groups of workers;
- Unjustified interference with the performance of other people's work;
- Hindering others' individual career prospects for mere reasons of personal competitiveness or in favor of other employees..

5.15. HEALTH AND SAFETY AT WORK PROTECTION

Skinlabo promotes and ensures the health and safety at work of its employees and all those who access its offices and work environments.

Moreover, Skinlabo is committed to ensuring working conditions that respect individual dignity and safe and healthy work environments, also by spreading a culture of safety and awareness of risks and promoting responsible behavior by everyone in compliance with company procedures and current accident prevention regulations.

Recipients must not create dangerous situations for themselves and their colleagues and must operate in compliance with internal regulations, collaborating in the improvement of control and prevention systems. Being under the influence of alcoholic substances, narcotics, or substances with similar effects during work performance or in the workplace will be considered as a conscious assumption of risk.

The Company implements all necessary measures aimed at identifying, assessing, and monitoring risks related to the physical integrity of workers, as well as all those who operate at the Company's offices. Skinlabo is committed to training related to safety regulations at work, first aid, and firefighting.

5.16. INTERNAL ORGANIZATION

Skinlabo defines the responsibilities of each resource in the decision-making process and schedules periodic management team meetings to plan development strategy and make crucial decisions. Recipients are called upon to carry out the activities within their competence with a commitment appropriate to the responsibilities entrusted to them, protecting the reputation and image of the Company. They are also called upon to honor commitments arising from contracts entered into with the Company.

In Skinlabo's offices, the spirit of "work together" is prevalent: work teams are organized to represent the specific business function in which they operate, but with the logic of interdisciplinary cooperation, in order to efficiently pursue all tasks and objectives with a view of effective collaboration. In this context, each resource is invited to actively engage in setting up interactions characterized by trust, empathy, transparency, and responsibility.

Skinlabo considers internal communication and the exchange of information and experiences as essential elements for the effective functioning of the company. The company commits to allowing maximum transparency in communicating information and performance metrics to promote a collaborative spirit and alignment of desired objectives.

Internal communication is the primary and direct responsibility of each function manager in the context of proper management of interpersonal relationships with their collaborators.

6. Implementation

Skinlabo reserves the right not to initiate or continue professional and/or commercial relationships with those who do not intend to adhere to the principles contained in this Code of Ethics. Skinlabo commits, towards all recipients of the Code of Ethics, to:

- Ensure its dissemination by making it available to all recipients and implementing appropriate training programs. The Code of Ethics will be delivered to anyone who requests it. A copy of the Code will, in any case, be delivered to each of the recipients who will countersign for its receipt and acceptance. Moreover, a copy of the Code of Ethics will be kept within the Company, which commits to exhibiting it upon request of the interested party.;
- Ensure its periodic review to adapt it to the evolution of civil sensitivity and current legislation. The Code is subject to verification and possible updating on an annual basis, or whenever corporate and/or legislative innovations make it necessary. The update will be carried out through monitoring the company's performance and analyzing the reports received, and will be subject to appropriate dissemination;
- Prepare support tools to provide clarifications regarding the interpretation and implementation of the provisions of the Code of Ethics. Anyone who needs clarifications regarding the content of the Code can send their requests to the email address sustainability@skinlabo.com.
- Periodically verify the adherence to the Code of Ethics by its recipients.

FOR SUPPLIERS ONLY

The Skinlabo Code of Ethics, which is endorsed by suppliers, is accompanied by a non-financial performance evaluation questionnaire that must be completed annually. The purpose of these measures is not only to monitor the quality of the suppliers' work but also to assist in their growth by providing basic tools to manage their externalities. This is aimed at creating an increasingly sustainable supply chain, thereby contributing collectively to a more positive impact on the environment and people.

7. Disciplinary System and Sanctions

Non-compliance with the norms of the Code by the Recipients entails different sanctions depending on the severity of the act and the role played by the involved Recipient, without prejudice to any right to compensation for damages possibly arising from such non-compliance. The imposition of sanctions is, in any case, carried out in observance of the law, collective agreements, and all guarantees provided in favor of the subject affected by the sanctioning measure.

Compliance with this Code by the Recipients is in addition to the general duties of loyalty, correctness, execution in good faith of the [employment] contract, and is also relevant for the purposes of Art. 2104 of the Civil Code (Diligence of the worker).

For violations of the Code committed by subjects having collaborative relationships with the Company, the sanctioning measures contained in the respective contracts will be applied.

The adoption of disciplinary measures is independent of the criminal relevance of the violation committed.