

## CODE OF ETHICS



#### INTRODUCTION

#### DEAR KAMEDIS TEAM,

Kamedis is, first and foremost, about wellbeing.

Since its earliest days, Kamedis has been guided by an unwavering commitment to the highest professional standards, as well as our awareness that true success can only be achieved through honesty and integrity.

This Code of Ethics applies to all of us here at Kamedis, and to all aspects of our activities, including how we interact with our colleagues, partners, suppliers, customers, and various other stakeholders.

I firmly believe that the mutual trust we create through our ethical conduct, as well as by nurturing a positive workplace where everyone feels comfortable, safe, and empowered, is one of our greatest assets. As Kamedis continues to grow and expand, building new communities of customers and partners, it is vital for us to lead by example and protect our reputation as a responsible, ethical business.

Please read the Code closely and regularly refer to it for guidance on resolving various issues and dilemmas. I also encourage you to raise questions and further suggestions with me, or with your HR representative.

Sincerely,
Roni Schwartz Kramer
CEO & Founder



#### OUR MISSION

## DEVELOPING CLINICALLY PROVEN BOTANICAL SOLUTIONS FOR ALL SKIN COLORS, TYPES, AND CONCERNS.

Kamedis strives to enhance the wellbeing of people worldwide by focusing on what we all share: skin, the natural world, and an aspiration to a brighter future. Using our own unique methodology, we harness the pure benefits of traditional botanical remedies and other ingredients to create safe, effective products proven to relieve common skin conditions and balance the skin's natural barrier.

Every Kamedis product is designed to care for a diverse world, full of different skin colors, types, and concerns. Accordingly, we are committed to upholding socially responsible, transparent practices that will make exceptional skincare accessible to everyone around the globe.



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#### **GUIDING PRINCIPLES**

#### WHY KAMEDIS HAS A CODE?

If you think of integrity as a destination, our company's Code of Ethics and Business Conduct is the map we use to get there.

It provides information to help us work fairly and honestly wherever we conduct business in the world, and it outlines the steps we need to take for making ethical decisions along the way.

Kamedis' Code helps us to reduce uncertainties with regards to behavior and to stay on the right track, pointing us in the right direction when we're not sure of what to do. It also represents our shared commitment to the highest standards of integrity. By working for Kamedis, you are agreeing to follow its Code. The Code of Ethics applies to Kamedis and all its affiliated companies.

#### WHAT'S YOUR RESPONSIBILITY?

As a valued member of the Kamedis team, we rely on you to:

- Read the Code, be familiar with it and make sure you comply with it
- Check the Code when you're not sure of what to do
- Do the right thing
- Be alert to activities going on around you. Report any violations, or suspected violations, of the Code.

We want you to feel comfortable coming forward, without any apprehension. That's why we strictly prohibit any reprisals or intimidation of employees who speak up and report any violation, or suspected violation, of the Code, Kamedis will address and investigate all claims of retaliation.

Guiding Principles



#### Involved in a situation that just doesn't feel right?

Discuss it with your HR representative and or your direct manager.

## YOU ARE IN CHARGE OF YOUR DECISIONS AND ACTIONS

Always act legally and ethically even if someone tells you to do otherwise.

Remember, no one has the authority to violate or instruct you to violate the law or the Kamedis Code of Ethics and Business Conduct.

If you suspect illegal orunethical activities, share your concerns. By speaking up, you are helping us uphold an honest and ethical Kamedis.

Kamedis' Code complements the company's policies, procedures and employment agreements. If you encounter an inconsistency or conflict, discuss it with your HR representative or your direct manager to determine the proper course of action. It's important to know and follow the Code at all times. Anyone who violates the Code may be subject to disciplinary action, which may include termination of employment and in some, cases legal action.

### WHAT IF A LOCAL LAW WHERE I WORK CONFLICTS WITH THE CODE?

As a company operating in a global marketplace, we engage with a wide range of social customs, rules and regulations, cultures and laws. We have an obligation to comply with all applicable laws wherever we operate. If a local law conflicts with the Code, you should follow the law, but please advise the HR representative of the conflict.

If you find, however, that a local business practice conflicts with the Code, you should follow the Code. Not sure? Ask for help.

#### MAKE GOOD CHOICES

Kamedis counts on you to use good judgment in your decision making. But, if you are ever faced with a complex ethical situation, ask yourself the following:

- Is it legal? YES
- Is it in line with Kamedis Code and other company policies? YES
- Would you feel comfortable if everyone knew you did it? YES
- Would it be viewed positively by your co-workers, your company and companies Kamedis does business with? YES
- You can go ahead and do it.

If you are in doubt as to any of the above or if you feel uncomfortable about a situation, discuss it with your direct manager or your HR representative.

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#### RESPECT FOR KAMEDIS EMPLOYEES

Kamedis employees are the company's greatest asset.

This section of the Code intends to ensure that every employee is treated with dignity and respect.

#### **EQUAL OPPORTUNITY AND DIVERSITY**

Kamedis is committed to providing equal employment opportunities to all qualified candidates and does not discriminate based on race, color, religion, gender, sexual orientation, age, national origin, disability or veteran status or any other status that is protected by law.

Kamedis' commitment to a diverse workforce is reflected in all its employment practices, including decisions about recruiting and hiring, working conditions,

appraisals, compensation and benefits, training, promotions and demotions, transfers, layoffs and terminations, and disciplinary actions.

These kinds of decisions are based solely on an individual's performance, experience, training, work history and overall job suitability.

Kamedis is proud of the cultural diversity of our company.

#### **POLITICAL ACTIVITY**

Kamedis respects the right of employees to engage in political activity to support political groups, government officials or candidates. Any such activity must be voluntary and performed in the employee's own time, at the employee's own expense. It must be clear that the employee is acting independently and not as a representative of the Company.

Workplace environment

#### **RELATIONSHIPS WITH CO-WORKERS**

Kamedis acknowledges that employees can develop social and personal relationships in the workplace provided that these relationships do not interfere with the work performance or with the effective functioning of the workplace.

Employees who engage in personal relationships (including romantic and sexual) should be aware of their professional responsibilities and are responsible for ensuring that the relationship does not raise concerns about abuse of power, harassment, favouritism, bias, or conflict of interest.

If a consensual personal relationship does exist in a supervisory context, the employee who is in the position of greater influence or authority must disclose the relationship to HR representative and initiate arrangements to address any issues of conflict of interest.

Employees who have or are involved in a personal relationship must ensure that:

- 1. The employee in the position of greater authority should remove themselves from influence, input, or decision-making power over the other employee;
- 2. Employees shall not participate in personnel decisions when their objectivity could be compromised to any reasonable extent.

Employees must avoid any situation where there could be a perceived conflict of interest.

#### HARASSMENT FREE

#### Harassment: recognize it, report it

As employees, we value and respect each other.

We do not harass others based on their race, color, religion, gender, sexual orientation, age, national origin, disability or veteran status or other status that is protected by law, or at all.

Harassment is when words or actions are used in a way that interferes with someone's work or creates a work environment that is intimidating, hostile or offensive. Harassment can take many forms including words, derogatory statements, signs, offensive jokes, cartoons, pictures, posters, e-mails, pranks, intimidation, physical contact or assault.

#### Sexual harassment

Any form of sexual harassment, including unwelcome sexual advances of either a physical or verbal nature, is strictly prohibited. Sexual harassment can cross age and can involve people of different or the same gender. To ensure the protection of every employee, Kamedis has a prevention of sexual harassment policy that provides details about the kinds of behaviours that are considered to be harassment. The policy also provides information on how to file a sexual harassment complaint.

Be sure you know, understand and follow Kamedis' prevention of sexual harassment policy. Kamedis will discipline any employee who is found to be guilty of harassment. This may include dismissal.

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#### Report misconduct towards yourself and others

You are a valued member of Kamedis, and you have a right to work without fear or intimidating, hostile or offensive behaviour from anyone, including your manager. If this situation arises contact your HR representative.

You have responsibility to act when you see or suspect a threat or risk to anyone at Kamedis. Report misconduct regarding yourself and speak out on behalf of others. Notify your HR representative or your manager.



#### What you need to do:

- Treat others with dignity and respect
- Support and promote a workplace that values all people, regardless of culture, background and life experience
- If you know or suspect that others are being harassed or discriminated again, report it immediately.
- Know <u>Kamedis' Prevention of Sexual harassment policy</u>





# EMPLOYEE HEALTH AND SAFETY

## HEALTH AND SAFETY IS EVERYONE'S RESPONSIBILITY

Kamedis aims to provide a safe workplace for all employees and visitors. The company counts on you to follow all health and safety rules and notify your HR Representative immediately of an accident, injury or illness you may experience on the job. Likewise, notify on any safety issue you identify.

#### KEEP KAMEDIS VIOLENCE-FREE

Threats or violence of any kind (including physical violence, intimidation, harassment or coercion) are not tolerated at Kamedis. Weapons are also prohibited while working on Kamedis business, whether you are workingon-site, off-site or traveling on behalf of Kamedis.

#### PROTECT EMPLOYEE PRIVACY

Our company works to balance its employees' need for privacy with the need to gather essential information. Personal information about Kamedis employees – gathered for business, legal and contractual reasons, such as your home address and phone number, salary information, benefits information – is kept strictly confidential and shared only with those who have a legal right or a legitimate business need to know.

If you have access to personal information about co-workers, you must take every precaution to ensure it is not misused or improperly disclosed.

Employee health and safety



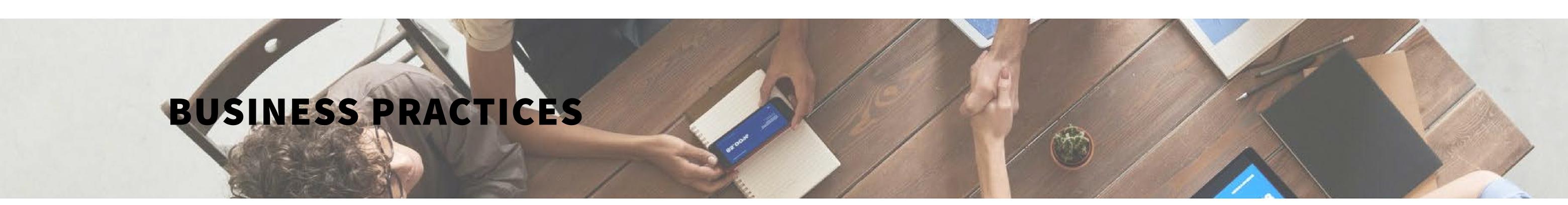
#### What you might be concerned about:

Sharing personal data of Employees or other relevant people, such as workforce personnel, customers and their customers.

If you are ever unsure about what kind of data is considered personal- ask!







We comply with national & international trade laws and respect tax laws in all countries where we operate.

#### **RESPECT FOR THE COMPANY**

Each of us has a responsibility to watch over our coworkers, our company and our reputation.

This section of the Code will help you understand how to protect Kamedis' interests and use Kamedis' resources wisely.

#### **CONFLICTS OF INTEREST**

Avoid conflicts of interest. Kamedis respects your right to conduct activities and pursue interests outside of work, but a "conflict of interest" can occur whenever

those activities or interests begin to interfere with your job responsibilities or affect the way you make decisions. Kamedis counts on you to make fair, objective decisions based on good business practices and not let personal interests, associations or investments interfere, or appear to interfere, with Kamedis' interest.

#### **ANTI-BRIBERY & ANTI-CORRUPTION**

Bribes and kickbacks are illegal. Never give or accept bribes.

As a company that is committed to fair and honest business practices and to the highest standards and promotion of good practices in the prevention of bribery and corruption, we trust you to never offer payment or accept payment from a Kamedis' customer or supplier in exchange for gaining or keeping business.

In all transactions involving Kamedis, we must ensure that business is won transparently and strictly on the basis of the products and services we offer.

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#### Is it ok to give or receive gifts and entertainment?

Giving or receiving something of value can be considered bribery, compromise our objectivity, create the appearance of a conflict of interest and harm the reputation of our company.

#### PROTECTING KAMEDIS ASSETS

Each of us has a responsibility to protect Kamedis' assets from damage, loss, fraud, misuse and theft. Kamedis' assets are the means for us to successfully carry out our company's business every day. Kamedis' assets include:

- Financial Assets: cash assets, bank accounts and credit standing
- Information Assets: confidential information, proprietary information and intellectual property
- Physical Assets: our company's facilities and equipment
- Technology Assets: computer hardware, software and information systems By safeguarding these assets, we help safeguard our company's competitive advantage in the marketplace.

#### Financial assets:

You are responsible for ensuring the completeness and accuracy of all company records, books, information and accounts, including expense reports, time sheets, payments and other business transactions. Accurate and complete

record-keeping is essential to the successful operation of our company and its ability to meet its legal and regulatory obligations.

Make sure Kamedis' books, records and accounts:

- Are clear, truthful, complete and accurate
- Follow Kamedis policies, procedures and controls
- Comply with all applicable laws, regulations and standards
- Accurately reflect the true nature of the transactions they represent

#### Information Assets:

Proprietary and confidential information.

All proprietary information about Kamedis is confidential and should be handled and protected in the same way.

Kamedis proprietary information is any information Kamedis owns. It includes things like the processes our company creates strategies it develops, specifications it designs, sales list it generates, systems it develops, personnel information, information related to current or future products and services, confidential market search, sales and marketing plans, earnings or financial data, organization information and many other types of information.

Disclosing confidential information of Kamedis can seriously damage our company and put current – and future – business opportunities at risk. It can also expose you and Kamedis to legal penalties. For any questions on confidential information, contact your direct manager or the HR representative. Confidential information also includes information you may be exposed to as part of your job, whether about Kamedis or its customers, suppliers or other

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third parties. It can be verbal, written or electronic information.

Use proprietary and confidential information only as needed to do your job and never share it with people who do not have a need for it, even within Kamedis. If you leave your job at Kamedis, you must return all proprietary and confidential information.

#### • Non-disclosure agreements:

Never share confidential information outside Kamedis without your manager's approval and without a non-disclosure agreement in place. Limit the amount of confidential information shared to the minimum necessary to address the business need. When dealing with suppliers, vendors, or other third parties, use extreme care to avoid improper disclosure. Copies of non-disclosure agreements should be kept in safe place.

#### • Intellectual property:

Kamedis' intellectual property is one of our company's most valuable assets. Intellectual Property includes, but is not limited to, patents, trademarks, trade names, copyrights, proprietary routines, computer programs, documentation, trade secrets, systems, methodology, know-how, marketing and other commercial and business information, techniques, specifications and plans.

Our intellectual property helps us remain competitive.

It is our mostconfidential asset and should be treated as such. Remember, just as Kamedis expects others to respect the legal rights our company has

in its intellectual property, our company has a responsibility to respect the brands, designs, software and legally protected intellectual property of other companies. Never copy, borrow, publish or use other companies' intellectual property without proper authorization.

#### Technology assets:

To protect Kamedis' technology assets:

- DO use only software that is legally licensed to Kamedis
- DO not install data or software not provided by Kamedis without approval from the systems administrator
- DO protect and do not share your individually assigned passwords and personal IDs
- DON'T use someone else's password, which you may have learned by chance or while performing your duties
- DON'T download files or e-mail attachments from unknown or suspicious sources
- DON'T send e-mails that contain offensive, harassing, illegal or otherwise inappropriate content

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#### What you need to do:

- Protect all Kamedis' assets financial, physical information and technology
- Keep all confidential information safe and comply withnon-disclosur obligations
- Do your part to ensure Kamedis' books, records and accounts are clear, complete, truthful and accurate
- If you see or suspect any violations of computer security measures, report your concerns
- Ensure the privacy of Kamedis' customers', partners and suppliers' information





#### RESPECT FOR MARKETPLACE



Kamedis is committed to conducting its business fairly, honestly and in accordance with the highest ethical principles.

Kamedis provides you with the information you need to do your job with integrity and expects you to observe ethical and sustainable business practices everywhere Kamedis operates in the world.

Kamedis is a fair and honest competitor.

Our company competes against other companies based only on the merits of our products and services and our ability to support our clients. We depend on you to be truthful in all customer interactions and accurately represent Kamedis' product and service quality, features and availability.

When we say something about our products and services, we must be able to substantiate it.

By following good business practices, we maintain the respect of Kamedis customers and Kamedis competitors and ensure future Kamedis business.

Should you have questions about fair competition practices, contact your direct manager or your HR representative.

#### **HONESTY ALWAYS**

- What is "industrial espionage"?

  Someone who is involved in industrial espionage is using illegal means to try to obtain information about a company's plans, products, clients or trade secrets.

  Fair competition means we...
  - Never interfere in contracts between a prospective customer and a Kamedis competitor
  - Don't engage in industrial espionage or offer bribes
  - Don't say disrespectful or untruthful things about Kamedis' competitors' products or services

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• Never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of facts.

#### • Never trade on inside information:

As an employee of Kamedis, you may not use inside information for personal gain or "tip" others about the information.

"Inside Information" – which is also referred to as "material non-public information" is any information about Kamedis.

Fraud and dishonest acts are not tolerated at Kamedis, while you are employed at Kamedis

To preserve an honest and ethical workplace, we promptly investigate all suspected acts of fraud.

Some examples of "fraud and dishonest acts":

- Forgery of vendor orders or contractor documentation
- Intentionally failing to accurately represent information, such as your expenses on your expense report or your working hours on your timesheets
- Dishonest accounting practices
- Using company property for personal purposes
- Identity theft
- Embezzlement
- Engaging a supplier, contractor or vendor if you have a conflict of interest or without undergoing the appropriate procurement process
- Receive anything of value from a vendor/partner without obtaining the appropriate approvals

#### **PUBLIC RELATIONS**

All information disclosed outside of the company must present the company accurately.

We all represent Kamedis. If someone asks you for information (for example, the media or investors), notify your manager and they will ensure the appropriate person responds to the request.

What you need to do:

Don't speak on behalf of Kamedis unless you're authorized to do so.



#### SUSTAINABILITY COMMITMENT

"The global climate emergency should drive us all, individuals and businesses, to rethink the way we consume and produce."

Roni Kramer, Founder and CEO of Kamedis.

Kamedis continually strives to avoid and mitigate negative environmental and social impacts, maximize positive impacts, and works to continually improve our performance in these domains.

We undertake to improve and maintain practices for the efficient use of energy, water and natural resource consumption; to reduce any risk to loss of biodiversity, damage to ecosystems and deforestation, and to ensure safe, and if possible circular, disposal of our waste. We measure our carbon emission footprint for our full operations, from field to skin, and conduct our operations in a way that our emission footprint is always considered.

Kamedis has established a sustainability program consisting of four strategic areas that cover the entire product value chain, from procurement of the botanical plants

for our extraction facility until our skincare products reach our customers.

The program helps us reduce environmental impacts from our operations and products and ensure clean and sustainable ingredients for our consumers skin and the planet.

Kamedis operates in a socially responsible manner, in a way that enhances the well-being of employees, customers and additional stakeholders, and aims to provide positive influence and added value to the communities around us.

We contribute time and resources to activities that promote social values and goals and believe that our success should also provide a positive influence and contribute to the quality of life in communities where we work and live.

As employees of Kamedis you are asked to be part of our continuous improvement and to foster new initiatives and better practices pertinent to our sustainability commitment.

Sustainability Commitment



## RELATIONS WITH STAKEHOLDERS

We select suppliers and business partners based on objective criteria and through fair procurement processes.

Kamedis believes in business partnerships founded on communication, transparency and respect, and aims to ensure reciprocal fairness in all relations. Kamedis has high standards for conducting business ethically and in accordance with governmental and industry standards, laws and regulations, as well as Kamedis's internal policies. Kamedis expects the same commitment from its suppliers.

Kamedis takes a zero-tolerance approach to any form of modern slavery, human trafficking or child labor practices in our business and supply chains.

<u>This Supplier Code of Ethics</u> documents principles and expectations for establishing and maintaining a business relationship with kamedis.

#### Conduct a dialogue with our customers

The relationship with the customers is important to us. We are committed to dealing efficiently, quickly, courteously and responsibly with every need or request that comes from the customers.

We are committed to being attentive to our customers.

We believe that creating a reliable relationship with customers contributes to a long-term relationship of trust.