



COTY CODE OF CONDUCT FOR BUSINESS PARTNERS

June 2026

Everyone that works for or on behalf of Coty can be faced with an ethical dilemma during our daily work, which can arise in any situation or interaction. No one is exempt from following Coty policies, including this Code of Conduct for Business Partners (the "Code"). We expect all Coty business partners, including suppliers, contractors, distributors, agents, brokers, lawyers, and consultants and their employees or subcontractors (hereafter "the Business Partner" or "Business Partners") to use good judgment and common sense to comply with the letter and spirit of our Code every day, and in everything you do.

The Code describes how Coty expects Partners to behave when facing specific situations which we all may face from time to time. When an issue is not directly addressed, Partners should use the Code as a roadmap for making ethical decisions. The Code is the base for all other Coty policies when discussing the behaviors expected of our employees and associated business partners.

Coty is committed to lawful and ethical business practices and as signatories of the United Nations Global Compact, we are committed to protecting human and labor rights, protecting the environment, and preventing corruption. We seek to do business with Partners who share these commitments. The Code supplements any agreement between Coty and the Partner.

To assist in selecting Partners committed to ethical and compliant practices, Coty may ask its Partners to participate in due diligence or similar processes prior to initiating services and/or at various stages in the partnership, in mutually agreed terms.

Partners are responsible for complying with all of Coty's business practices, including, but not limited to, those pertaining to fair dealing; disclosures; use and recording of corporate funds; insider information; document retention; and compliance with all laws and regulations. This also includes environmental, sustainability, antitrust, trade and anti-corruption laws and regulations. Each of us is also responsible to prevent and avoid situations of discrimination and harassment. Coty will not tolerate any violation of these rules.

Partners are responsible for taking all reasonable steps to ensure that their employees and subcontractors perform their activities in accordance with this Code. This can include implementing policies, training, operational controls, monitoring and disciplinary actions, which can be audited by Coty under the terms of this Code.

Partners must immediately notify Coty of any known or suspected violations of the law or this Code, and may do so through the Coty Ethics and Compliance hotline:



Web: hotline.coty.com

Phone: U.K: 0-808 189-1053 | U.S.: 800 461 9330.

Additional local phone numbers can be found at the web link.

The Coty Ethics & Compliance Hotline provides the option to raise any questions or concerns anonymously, if preferred, and is available for use 24 hours a day.

A breach of this Code or applicable laws will be considered a material breach of the applicable agreement entered into between Coty and the Partner. Coty may amend this Code and will always post the most current version on the Coty Supplier Portal (<https://supplier.coty.com>) that must always be followed by the Supplier and its team.



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1. Applicability of the Code of Conduct

The policies outlined in our Code must be respected, understood and followed by everyone who acts on behalf of Coty. We expect everyone working on Coty's behalf, including our Business Partners to understand and comply with our ethical standards as outlined in our Code. Business Partners should never ask a third party to engage in any activity that violates these standards – if you do, you will be in breach of our Code as well as the third party.

2. Coty Hot Line, Good Faith Reports & No Retaliation Policy

If, as a Business Partner, you have any questions or concerns regarding the Code or any Coty policy, we encourage you to speak up and reach out to us. If, while raising a concern or sending a report under this Code, you choose to identify yourself, your identity will be kept confidential by Coty, to the maximum extent possible. If you feel that it would be inappropriate to provide your name in connection with a report, you may, in good faith, report the behavior or potential violation completely anonymously using the Coty Hotline – in any case please ensure that you share as much detail as possible to allow a proper internal investigation.

Coty does not tolerate retaliation against anyone who makes a good faith report of known or suspected ethical or legal misconduct. In addition, Coty prohibits retaliation against anyone who participates in investigations in good faith. A good faith report means that you have provided all the information you have, and that you believe to be true.

3. Human Rights & Labor Rights

Coty is committed to respect frameworks set by inter-governmental organizations on the governance of large organizations and requires that all employees respect and follow the same standards. These include commitments to a number of international standards and guidelines relevant to corporate responsibility and business conduct, including United Nations (UN) Declaration of Human Rights (www.un.org); The Convention on the Rights of the Child (www.uno.org); The International Labor Organization (ILO) Fundamental Conventions (www.ilo.org); the Organization for Economic Co-operation and Development (OECD), Guidelines for Multinational Enterprises (www.oecd.org); and the UN Global Compact (www.un.org).

As a company, we are committed to the highest standards when it comes to the respect of Human Rights. We commit to respect, at a minimum, the standards expressed in the International Bill of Human Rights, and the United Nations (UN) Declaration of Human Rights, and the ILO Declaration of Fundamental Principles and Rights at Work.



These include:

- Convention no.87 and no. 98 regarding the freedom of association and the effective recognition of the right to collective bargaining
- Taking immediate and effective measures to eradicate forced labor, end modern slavery and human trafficking, and to Convention no. 29 and no. 105 regarding the elimination of all forms of forced and compulsory labor.
- Taking immediate and effective measures to eradicate child labor in all its forms and to the Convention no. 138 and no. 182 on the effective abolition of child labor.

4. Discrimination

Coty expects Partners' commitments to ensuring a safe working environment based on respect for all. Partners must follow and support this policy. Failure to comply with these rules is a violation of this Code.

Partners must provide a professional workplace that is free from unlawful discrimination or harassment. Employment-related decisions, including hiring, promotion, benefits, access to training, termination, and retirement, must be based only on relevant and objective criteria.

Partners are committed to providing equal employment opportunities and healthy work environments for its employees regardless of race, color, religion, age, gender, sexual orientation, gender identity or expression, disability, social background, national origin, citizenship, marital status, political opinion, trade union membership or activities, veteran status, migrant workers, or any other protected categories under applicable laws.

5. Child Labor

Partners may not engage in or benefit from the use of child labor, which is work that is exploitative, prevents children from getting an education or jeopardizes their physical, mental, or moral well-being.

Partners employing young workers (workers above the minimum age of employment but under the age of 18) must comply with applicable laws and regulations regarding hours, compensation and must avoid conditions or restrictions that could be harmful to their morals, health, safety and development. The minimum age for full-time employment must always be the higher of what is set forth in applicable law of a certain location or ILO recommendations, whatever is higher. For the purposes of this Code:

- A child is defined as a person under 14 years old.
- The minimum age for employment is the local legal minimum age for employment or the age for completing compulsory education, but, if permitted by local laws, at least 15 for full-time



employment or light, part-time work (subject to some minor adjustments for certain developing countries).

- Partners shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to enable her or him to attend and remain in quality education, until no longer a child.
- Children may not be employed at night or in hazardous conditions.

6. Forced labor, Human Trafficking

Partners must not participate in or benefit from any form of forced labor, including bonded, indentured or slave labor, involuntary prison labor, human trafficking or otherwise. Mandatory overtime is forbidden, and workers must be allowed to move around freely, leave their place of work when their shift ends or after giving reasonable notice and be free to terminate their employment following local laws. Partners may not impose monetary fines or retain employees' original identity papers or any other original official documentation. Remuneration or requiring recruitment deposits or any other constraints as conditions of employment are not allowed.

Partners may not use or tolerate any form of corporal punishment, physical or mental abuse, threat of violence, monetary fees or fines, or any other form of abuse, coercion, or intimidation. Coty will not tolerate any deviations from these rules.

7. Harassment

In addition to the provisions above, Partners must not tolerate bullying, moral, sexual, or any other form of harassment.

8. Employee Benefits, Compensation and Temporary Workers

Partners shall strictly comply with all applicable laws relating to wages, working hours, overtime and benefits. Partners must provide workers with reasonable breaks, sufficient rest between shifts, and at least one day off per week. Partners should not require workers to work in excess of 48 hours per week. Additional overtime must be voluntary and should not regularly exceed 12 hours per week and must be compensated at a premium rate (in line with the ILO Convention 1).

Partners must provide workers with written and understandable information about their wages and employment conditions prior to beginning employment, and documentation detailing the workers' wages and any deductions. Any deductions must be limited to those permitted by applicable laws.

Partners must provide employee benefits as provided by applicable laws, including but not limited to sick leave, public holidays, vacation time and parental leave. Repeat, temporary contracts may only be used for legitimate reasons and not for the purpose of denying employee benefits. Employment of temporary workers must comply with relevant national employment laws.



9. Freedom of Association and Collective Bargaining

Partners must respect the right of employees to form and join trade unions, to carry out their representative functions in the workplace, and to negotiate collectively, in accordance with applicable laws and this Code. Partners may not attempt to influence employees to be members of a particular Trade Union and may not dismiss employees because of their affiliation with a Trade Union.

10. Conflict Minerals

Coty is committed to ensuring that we do not source conflict minerals that fund armed groups in conflict regions, either directly or through its Partners. This includes any of the following minerals: Columbite-Tantalite (also known as Coltan), Cassiterite, Gold, Wolframite, their derivatives tantalum, tin or tungsten, or chemical compounds (such as tin oxide) derived from tantalum, tin, or tungsten. These are collectively referred to as the "Conflict Minerals" in accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act").

Partners must notify Coty immediately if any of these minerals are deemed necessary to the functionality or to the production of a product or component manufactured for or on behalf of Coty. Partner must also notify Coty immediately if any Conflict Minerals are sourced from the Democratic Republic of the Congo and surrounding countries, including Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

11. Health and Safety

Partners must comply with all applicable health and safety laws, rules, regulations and industry standards, and take all necessary steps to ensure that their workers are offered a safe and healthy working environment, including but not limited to:

- Implementing a written health and safety policy that is available to all workers.
- Minimizing hazards inherent in the working environment as much as reasonably applicable.
- Providing all workers with regular and recorded health and safety training.
- Ensuring access to clean toilet facilities, potable (drinking) water, and sanitary facilities for food storage; and
- Ensuring that accommodation, where provided, is clean, safe, and meets the basic needs of the workers.

Promoting a safe and healthy work environment also means the Partner commits to respecting internationally agreed guidelines regarding working hours, as enshrined in the Universal Declaration of Human Rights (Art. 24) and the International Covenant on Economic, Social and Cultural Rights (Art. 7), and the ILO standard on working hours.



12. Training and Reporting Systems

Partners must take all reasonable steps to train workers who perform duties on behalf of Coty on the requirements of this Code. Partners must also have systems in place to detect and resolve treatment of workers that violate applicable law or this Code, including a method for workers to safely report concerns.

13. Protection of the Environment

Partners must comply with applicable environmental laws and regulations, including but not limited to, the EU REACH Directive, the EUR Deforestation Regulation (EUDR) and California Proposition 65, and any legislative developments that may be enacted.

Partners shall work systematically to prevent, minimize, and remedy adverse environmental impacts from their activities, products and services by means of a proactive approach and management of their environmental responsibilities. These impacts include but are not limited to:

- Greenhouse gas emissions (GHGs)
- Air pollution
- Water use
- Waste-water management
- Waste to landfill
- Deforestation
- Biodiversity impacts

14. Lawful and Ethical Business Practices

Partners must always conduct business with honesty and integrity and demonstrate the highest standards of business ethics, including compliance with all applicable laws, rules and regulations, in line with Coty standards.

15. Bribery and Corruption

Coty is subject to the U.S. Foreign Corrupt Practices Act, the U.S. Foreign Extortion Prevention Act, the U.K. Bribery Act, and the anti-corruption laws of the nations in which Coty does business. Although the application of these laws may be complex, their central purpose is simple: to punish corporate entities and individuals who resort to bribery or corruption to obtain or retain business. Coty expects Partners to follow the same standards. Partners are prohibited from engaging in any form of direct and indirect bribery and/or corruption, as highlighted below.

In line with the applicable Terms and Conditions and/or contract between Coty and the Partner bribing foreign or domestic government officials is strictly prohibited and will not be tolerated. Any



offer, payment, promise or transfer of anything of value (a “Thing of Value”) to influence a Government Official to assist Coty or the Partner in obtaining or retaining business or securing some other improper advantage is expressly prohibited and will not be tolerated. Requesting or accepting a bribe, personal advantage or ‘kickback’ from foreign or domestic government officials is strictly prohibited and will not be tolerated.

In addition to any direct offers, payments and transfers of a Thing of Value made in violation of this policy, indirect offers, payments and transfers are equally prohibited. This means that an offer, payment or transfer of a Thing of Value that is made to a Government Official through a Partner’s third party (agents, agencies, consultants, intermediaries, joint venture partners, distributors and third-party representatives acting on Partner’s behalf) will involve the same risk and consequences for Coty and the Partner who has authorized the offer, payment or transfer as one made directly. Further, an offer, payment or transfer of the Thing of Value to a family member, friend or other representative of a Government Official will involve the same risk and is forbidden.

In addition to prohibiting the bribery of foreign and domestic government officials, Coty prohibits private sector bribery – promising, offering or giving money or anything else of value, as well as requesting or accepting money or anything else of value to prompt the recipient or some other person to violate his or her duty of loyalty to his or her employer.

Partners must also comply with all applicable laws prohibiting financial fraud, money laundering and tax evasion.

To help prevent such activities, Coty will only make payments to a Partner to a bank account titled in the name of the contracted Partner in the country where the services are performed or where the Partner is incorporated.

16. Conflicts of Interest

A conflict of interest is any circumstance that could cast doubt on a Partner’s ability to act appropriately regarding Coty’s best interests, or any situation that benefits the individual to the detriment of Coty. While we cannot list every circumstance that constitutes a conflict of interest, as they might appear in different scenarios, there are some common situations that most certainly can result in a conflict of interest:

- Having an undisclosed, substantial personal relationship with a Coty employee, supplier, competitor, or Coty customer.
- Having an undisclosed, substantial financial interest in a supplier, competitor, or customer.
- Having an undisclosed interest in a transaction in which Coty is, or may be, interested.
- Taking advantage of other corporate opportunities for personal or Partner benefit.



- Receiving undisclosed fees, commissions, excessive gifts or gratuities, or other compensation from a Coty supplier, competitor or customer; or
- Having outside business or other interests that have a negative impact on Partner motivation or performance.

Any actual or potential conflicts of interest between Coty employees and a Partner must be immediately disclosed in writing to Coty.

In addition, Partners are expressly forbidden to offer any funding, donations, gifts or entertainment to any Coty employees, including all Supply Chain employees, who play a role in the identification, recommendation, selection, contracting and/or oversight of the Partner.

17. Compliance with Trade Restrictions

Coty is subject to a variety of laws and regulations, imposed at both national and international levels, restricting our business dealings with certain countries, entities and individuals. Compliance with such laws and regulations is mandatory for all Partners. Partners must ensure that they do not enter into any transactions, agreements or understandings with third parties that are in breach of the trade restrictions applicable to Coty or that could cause Coty to breach these trade restrictions.

18. Fair Dealing & Compliance with Antitrust Laws

Coty is committed to promoting vigorous, free and open competition as set forth in applicable antitrust and competition laws, including those that prohibit agreements and practices in restraint of trade such as price fixing, boycotts, predatory pricing and other acts of unfair competition. As part of that commitment, Coty emphasizes that Coty distributors and other sales agents make their own decisions regarding resale prices of Coty products. While Coty may recommend resale prices, those are recommendations only and Coty will not instruct, require, or approve actual resale prices.

Coty expects the same commitment from its Partners. Some examples of prohibited conduct include:

- Discussing Coty pricing or other competitively sensitive matters with Coty competitors.
- Agreeing not to deal with another company.
- Agreeing to divide or allocate customers, markets, or territories; and
- Entering into any agreements or understandings that restrict competition, agreements to fix prices, allocate markets or limit sales.

19. Product Safety

Ensuring the safety of Coty products is critical to Coty's success and to the well-being of its consumers.



Coty's products have always been formulated with the utmost levels of safety and quality in mind. Product safety is therefore a critical aspect of quality, and Partners must do their part to ensure that:

- Their products' components and packages are safe for Coty's consumers and the environment when used as intended; and
- Coty meets or exceeds all applicable legislative and regulatory requirements related to product safety and labelling.

20. Compliance with the Coty Code of Conduct for Business Partners

Partners are expected to take all reasonable steps and measures to ensure compliance with the Code. Without waiving any of its contractual rights, including, but not limited to the right to terminate for violations of the Code, Coty is committed to working with Partners to deliver effective actions for change where Partners proactively request assistance.

Coty's Code of Conduct for Business Partners is available on the Coty Supplier Portal (<https://supplier.coty.com/>) and is generally provided to Partners as part of their written agreement with Coty and/or in the Coty's Terms & Conditions. Partners are expected to comply with the most recent version of the Code. Should there be any material updates or amendments to the Code, it is expected that Partners will work with Coty teams proactively, to facilitate and agree with any new revisions.

21. Risk Assessments and Screening

Coty conducts risk assessments of its Partners, based on a variety of factors including country of operation or manufacture, type of goods and services provided, amongst others. Partners that are considered higher risk are prioritized for compliance verification. Coty utilizes various methods of verification, according to the type of Partner and risk factors, and one or more may be used with a particular Partner. Examples of verification processes include but not necessarily limited to a comprehensive CSR assessment, via the Ecovadis or Sedex platform, GRESB assessment for Real Estate partners, an ethics audit using the Sedex platform, and a due diligence assessment via a public records screening process.

Verification may occur prior to the initiation of services for Coty, or during the term of the agreement or upon renewal or change to the scope of services. Failure to fully cooperate with screening is considered a serious breach of the agreement and this Code. Where the Ecovadis screening tool is utilized, Coty requires a score of 45/100, with a target of 65/100. For more information about Ecovadis: <https://www.ecovadis.com>. Where the Sedex platform is utilized, Coty requires that all critical and major non-compliances are remediated through an independent verification process. A completed Self-Assessment Questionnaire and a management control score of 2.5 or above is also required. For more information about Sedex: <https://www.sedex.com>.



Red flags identified via the due diligence process must be either cleared or mitigated prior to conducting or continuing work with Coty.

22. Audits

Coty reserves the right to conduct audits to assess a Partner's compliance with the terms of the agreement, including compliance with the Code, and all applicable laws, rules and regulations, with or without notice. Partners are expected to provide full cooperation. Where necessary, Coty will work with the Partner to conduct a robust audit while respecting the Partner's commercially sensitive or proprietary information. Failure to fully cooperate with an audit is considered a serious breach of the agreement and this Code.

23. Investigation. Remedial Action and Timely Notice

Partners shall investigate any allegations, events, or reports of actual or suspected violations of this Code, remediate any such identified risk, including through the development of a formal written action plan for such remediation, up to and including termination of any implicated third-party relationships and identify and engage suitable alternatives. Partners shall notify Coty in writing within three business days after becoming aware of any allegations, events, or reports of violations of this Code. Failure to do so will constitute a material breach.

24. Acknowledgement

By entering into an agreement with Coty, the Partner acknowledges and agrees that its representatives have received and read a copy of the Coty Code of Conduct for Business Partners and understands the Partner's obligations under this Code of Conduct for Business Partners.

Name of Company:

Your Name:

Job title:

Your main Coty contact(s):

Date:

Signature & Company stamp:
