

**POL 05**  
**ETHICAL**  
**POLICY**

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0	06/05/2026	First issue	<i>Chiara Paravelli</i> CHIARA PARAVELLI (Sustainability Coordinator)	<i>Marco Oppedisano</i> MARCO OPPEDISANO (Quality Assurance)	<i>Marina Della Marchesina</i> MARINA DELLA MARCHESINA (General Management)

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## 1. Purpose and Scope

This policy sets forth the ethical principles that guide the conduct of all employees, executives, contractors, and partners of Pink Frogs Cosmetics, with the aim of ensuring transparency, integrity, and accountability in all business activities.

It applies to all individuals and organizations that work with the company, in all locations and countries where Pink Frogs Cosmetics operates.

This policy complements and is based on the principles contained in the Company's Code of Ethics, a fundamental document that defines the values and behaviors expected of all employees, who are required to comply with both the Code of Ethics and specific company policies such as the one described here.

## 2. Commitments and Principles

Pink Frogs Cosmetics is committed to upholding the highest ethical standards in all its activities, conducting itself with transparency, integrity, responsibility, and respect toward all its stakeholders.

The fundamental principles that guide the company are:

- **Quality and Safety:** ensuring products and services that meet the highest quality standards, safeguarding the health and safety of customers, employees, and the environment.
- **Transparency and Integrity:** operating with clarity and fairness in internal and external communications, ensuring the accuracy of information provided to customers, partners, employees, and the community.
- **Respect for the Individual and Diversity:** promoting an inclusive, fair, and non-discriminatory work environment, valuing the dignity, human rights, and diversity of every individual.
- **Protection of Human Rights:** rejecting and preventing any form of child labor, forced labor, human trafficking, and discrimination, in accordance with international standards (e.g., ILO).
- **Prevention of Corruption, Fraud, and Conflicts of Interest:** conducting business activities in compliance with laws and ethical standards, combating any unlawful behavior or conduct that could compromise the integrity and objectivity of decisions.
- **Environmental Sustainability:** adopting production and management practices that reduce environmental impact and promote sustainable development, in line with ISO 14001:2015 certification.

- **Social Responsibility:** contributing to the well-being of the communities and regions where we operate through initiatives that listen to, support, and strengthen relationships with stakeholders.

Pink Frogs Cosmetics recognizes the Company Code of Ethics as a fundamental document that sets forth in detail the values and ethical responsibilities to which every employee, contractor, and partner must adhere. This Ethics Policy supplements and reinforces these principles, providing a concrete framework for the daily practice of ethical conduct.

Compliance with these commitments is monitored and promoted by the Ethics Committee, which serves as a point of reference for reporting any violations and for implementing corrective measures, while also ensuring the protection of anonymity and the absence of retaliation for those who report misconduct.

All recipients of this policy are required to be familiar with, share, and actively promote these principles, thereby contributing to the reputation and sustainable success of Pink Frogs Cosmetics.

### 3. Roles and Responsibilities

To ensure the proper application of and compliance with this Ethics Policy, Pink Frogs Cosmetics assigns specific roles and responsibilities to the following individuals:

- **All employees and contractors:** are required to be familiar with, understand, and adhere to the ethical principles and standards set forth in this Policy and in the Company's Code of Ethics, and to conduct themselves in a manner consistent with these values in all work-related activities.
- **Department Heads:** are responsible for promoting and fostering an ethical culture within their areas of responsibility, ensuring that staff are adequately trained and supported in applying the Ethics Policy. They must also monitor compliance with the policy and promptly report any instances of non-compliance.
- **Ethics Committee:** is the body responsible for monitoring compliance with the Ethics Policy and the Code of Ethics, managing reports of non-compliant behavior, assessing critical situations, and proposing any corrective actions. The Ethics Committee promotes awareness initiatives on corporate ethics and acts as a point of reference for all employees and collaborators.
- **Management:** is responsible for defining, approving, and updating the Ethics Policy, ensuring the necessary resources for its implementation, and integrating it into the overall corporate strategy. Furthermore, Management fosters a work environment based on integrity, transparency, and accountability, setting a good example through its own conduct.
- **Human Resources:** Coordinates the dissemination of the Ethics Policy to all staff, ensuring that new hires receive the relevant documentation and that communications through company channels are carried out regularly.
- **Sustainability Department:** is committed to promoting a corporate culture based on integrity, accountability, and active engagement on ethical issues.

- **Quality Assurance:** Oversees the Ethical Policy's compliance with company management standards and verifies, during internal audits, that communication and reporting channels are active and properly publicized.

Pink Frogs Cosmetics encourages all recipients of this policy to report any violations or unethical conduct, including anonymously, using the tools provided by the company's **whistleblowing** system. The company guarantees protection against retaliation and strict confidentiality for those who report in good faith, thereby promoting a safe and transparent work environment.

#### 4. Key actions and practices

To ensure the effective implementation of the principles set forth in this Ethics Policy, Pink Frogs Cosmetics has adopted a set of measures and operational practices designed to promote consistent conduct, shared responsibility, and continuous improvement.

- **Dissemination of Ethical Principles:**  
All new employees and contractors receive the Code of Ethics and key company policies upon joining, and are required to acknowledge receipt. These documents are also available in hard copy on company bulletin boards. This ensures that every individual is immediately familiar with the organization's core values.
- **Internal Communication and Transparency:**  
Pink Frogs Cosmetics promotes open, clear, and transparent communication at all levels of the organization. Relevant information, including details regarding the company's ethical values and any regulatory or procedural changes, is made available to all employees through official channels, such as internal communications, company bulletin boards, and digital tools. Transparency is considered a guiding principle in internal relations, in the management of activities, and in relations with external stakeholders.
- **Prevention of Conflicts of Interest**  
All employees and contractors must avoid situations in which personal, financial, or family interests may interfere with the company's interests. Should potential conflicts of interest arise, they must be promptly reported to one's manager, the Ethics Committee, or via the Whistleblowing channel for appropriate evaluation and management.
- **Gifts, Gifts, and Hospitality (Gift & Hospitality)**  
Pink Frogs Cosmetics permits the exchange of gifts or hospitality only if they are of modest value, occasional, and not such as to influence the impartiality of business decisions. Any form of gift, benefit, or advantage that could be interpreted as an attempt to obtain favorable treatment or influence business decisions is prohibited. Any questionable situations must be promptly reported to your manager or the Ethics Committee.
- **Prevention of Fraud and Corruption**  
Pink Frogs Cosmetics maintains a zero-tolerance policy toward any form of fraud, corruption, or unlawful conduct. Preventive measures, internal controls, and disciplinary procedures are in place to ensure compliance with laws and ethical principles. Any suspicion of fraud or corruption must be reported immediately through the whistleblowing channels or to the Ethics Committee so that each individual case can be addressed promptly.

- **Handling of Internal Reports:**

Employees are encouraged to report any conduct or situations that do not comply with the Code of Ethics directly to the Ethics Committee, including through discussions with their supervisors. The Ethics Committee evaluates the reports received and, if necessary, informs Management to determine appropriate corrective actions, always ensuring the confidentiality and protection of the whistleblower.

In pursuit of these commitments, the following specific objective is established.

Objective: To ensure that up-to-date company policies are consistently available and accessible to all internal and external stakeholders.

Indicator: Presence of the current versions of the policies in the designated distribution channels (company bulletin boards, shared folders, and website).

Verification method: Periodic checks (internal audits) to verify that the revision numbers of the documents displayed/published match the latest version approved by management.

Objective: To ensure that relevant information, including ethical and regulatory matters, is communicated clearly, promptly, and in a manner accessible to all employees.

Indicator: Percentage of employees who report being adequately informed about corporate ethical issues.

Verification method: Assessment of the effectiveness of internal communication through periodic surveys and analysis of the results.

Objective: To prevent and manage situations involving conflicts of interest, fraud, and corruption, while ensuring that the handling of gifts, gratuities, and hospitality complies with the principles of transparency, fairness, and integrity, in order to ensure impartiality in decision-making processes.

Indicators:

Percentage of office staff trained on ethical issues, conflicts of interest, anti-corruption, and the management of gifts and hospitality.

Number of reports of gifts exceeding a modest value.

Interpretive note: The data on reports of gifts cannot be evaluated in absolute terms (high/low), but should be considered as a point of attention.

Verification methods:

Annual review of the annual training register (and spot checks of the annual training plan, employee training records, and individual records of training events).

Register of gifts received by employees.

Objective: To ensure the effective, timely, and confidential handling of internal reports and those received through the whistleblowing channel.

Indicator: Number of annual reports and associated processing times.

Interpretive note: The data cannot be evaluated in absolute terms (high/low), but rather as a point of focus for measuring the effectiveness of communication and the level of trust in the reporting system.

Verification method: Register of internal reports and those received via the platform, tracking handling timelines.

Objective: To promote a corporate culture based on integrity, responsibility, and active engagement on ethical issues.

Indicator: Number of awareness-raising initiatives carried out (e.g., internal communications, meetings, discussion sessions).

Verification method: Tracking of activities carried out and internal communications disseminated during the year.

## 5. Monitoring and Continuous Improvement

The Ethics Committee meets to review reports received, address any issues that have arisen, and monitor overall compliance with the Ethics Policy and the Company's Code of Ethics. Minutes are taken during these meetings, documenting the reports, the issues identified, and the responses provided by management. The purpose of these reviews is to identify areas for improvement and ensure that the policy is effectively implemented.

Feedback is collected both informally, through direct dialogue between managers and employees during meetings or dedicated discussions, and formally, through reports submitted via the portal or the dedicated whistleblowing hotline. This system ensures a constant flow of information that helps continuously improve the company's ethical culture.

## 6. Regulatory and documentary references

This Ethics Policy complements and refers to the following documents and regulations:

- Pink Frogs Cosmetics' Code of Ethics, which defines the values, principles, and rules of conduct that all employees and contractors must adhere to.
- Legislative Decree 24/2023, implementing EU Directive 2019/1937, which regulates the protection of whistleblowers in the public and private sectors.
- Pink Frogs Cosmetics' Internal Whistleblowing Policy, which defines the procedures, tools, and safeguards for reporting misconduct.
- Applicable national and international regulations regarding corporate ethics, anti-corruption, and transparency.
- Compliance tools adopted by the company, such as the whistleblowing portal and internal procedures for managing reports.
- Pink Frogs Cosmetics Supplier Code of Conduct, which defines the ethical principles and standards that all suppliers and business partners must adhere to.

Pink Frogs Cosmetics is committed to keeping these guidelines up to date in line with regulatory developments and industry best practices.

## 7. Entry into force

This Ethics Policy has been approved by the management of Pink Frogs Cosmetics and takes effect as of 06/05/2026, remaining in force until any updates or revisions are made, which will be promptly communicated to all recipients.

The Ethics Policy will be made easily accessible to all recipients via a shared online folder and in hard copy posted on company bulletin boards, to ensure maximum dissemination and accessibility.

To ensure transparency toward external stakeholders as well, this Ethics Policy will also be published on the company website, where it will be easily accessible to customers, suppliers, and partners.

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