



CODE OF ETHICS

May 2025

Our Code of Ethics: a true point of reference

Acting responsibly is, for us, a moral commitment and a core value. It is what strengthens our Group's identity and reinforces its reputation and credibility.

Integrity, respect, and responsibility are the fundamental principles that guide our daily work and the way we conduct our business. We aim for the highest ethical standards with an innovative and dynamic approach, placing Wellbeing Creation at the center—across our economic, social, and environmental context—for a better present and future.

The values and principles set out in our Code of Ethics serve as a vital guide, not only for how we behave within the Group but also for how we engage with the outside world. Promoting a culture of ethics, integrity, and respect is essential to strengthening our positioning and building lasting trust with our stakeholders.

Every choice, every decision matters. That is why it is essential for each of us to commit to upholding the Code of Ethics, putting it into practice through concrete, everyday actions. This is the only way we can build an inclusive, positive, and collaborative work environment, and continue our journey toward ever more ambitious goals.

We thank you for your dedication, commitment, and trust.

Together we can build a solid and increasingly wellbeing-oriented future.

Fabio Granata
Chief Executive Officer



Index

Code of Ethics Goals6

Code of Ethics’ recipients..... 11

Effectiveness, dissemination, and updating of the Code of Ethics..... 12

Who we are.....14

Our Philosophy.....16

Our Vision 21

Our Values 22

Fundamental Ethical Principles.....24

PEOPLE 26

Human resource management28

Gender equality diversity, equity and inclusion (DEI) 30

Health and safety at work31

Comsumer satisfaction.....33

Relationships with suppliers.....36

Relationships with competitors.....41

Relationships with istitutions, public administration, third party organizations, community42

Responsible communication.....47

ENVIRONMENT 50

Sodalis Group’s commitment to the environment52

GOVERNANCE 56

Governance’s structures: integrity, transparency, responsibility..... 59

Prevention of corruption and conflicts of interests62

Data protection and cybersecurity.....63

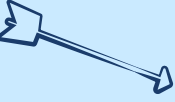
Monitoring, reports and sanctions.....67

Code of Ethics Goals

Our Code of Ethics aims to **guide Sodalis Group towards healthy and balanced growth**, pursuing goals that promote more responsible and transparent practices across the entire production chain.

This Code reflects the Group's commitment to ensuring that its values and principles guide all actions, helping to shape a better future.





Our goals, at the core of every action we take

1 **Promote ethical and responsible behavior**, ensuring compliance with laws and regulations

2 **Foster an inclusive and respectful work environment**, protecting the rights and well-being of those who collaborate with the Group

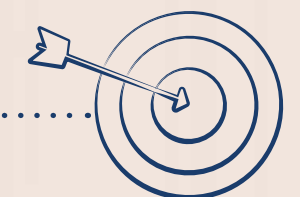
3 **Spread a culture of sustainability**, integrating more responsible practices into all our operations

4 **Support a corporate culture based on integrity**, encouraging all employees to actively contribute to upholding the principles set out in the Code of Ethics

5 **Ensure transparency in business decisions** and interactions with employees, customers, suppliers, and all stakeholders

6 **Build lasting relationships of trust** based on fairness and transparency with all those who interact with the Group

7 **Prevent noncomplying behaviour** through continuous and rigorous monitoring





Code of Ethics' recipients

Sodalis Group operates in Europe, the United States, and Mexico, with its own production plants, laboratories and offices. We operate through 12 locations, which work independently within their areas while maintaining high synergy and coordination, contributing to the Group's success.

Our Code of Ethics is adopted by all European companies within the Group, as it is harmonised with the legal, social and industrial context in which they operate. It provides a consolidated framework of values and expected behaviours for all those who interact with us.

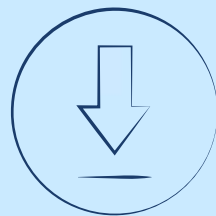
The values set out in the code of ethics guide all relationships, both internal and external.

Here are the stakeholders to whom the Code applies:

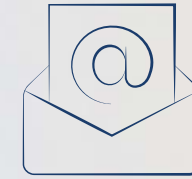


Effectiveness, dissemination, and updating of the Code of Ethics

This Code of Ethics takes immediate effect upon its adoption and remains valid until any future revision.

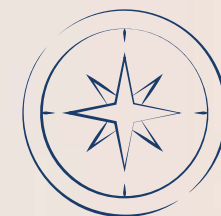


The Code is distributed to all its intended recipients, ensuring they receive the necessary support for a proper understanding and interpretation of its contents. A copy will be accessible via the website **sodalisgroup.com**



Any modifications or additions will be approved by the competent corporate bodies, also taking into account suggestions and recommendations from oversight bodies and all recipients. Any substantial revision or change to the Code of Ethics will be communicated to all relevant parties and organizations.

It is the responsibility of each recipient to fully implement and comply with the Code of Ethics, turning it into a genuine and constant point of reference that effectively guides every daily action.



Who we are



We are a **continuously evolving international entrepreneurial entity**, founded on the development of leading and distinctive proprietary brands in the **Health & Beauty, Personal & Home Care** markets.

We have achieved **solid and progressive growth** thanks to our ability to integrate and develop new businesses, making us **one of the leading independent players in our market** today.

We create Wellbeing for millions of consumers every day thanks to our extensive **portfolio of highly attractive and recognized proprietary brands**, with strong positions in pharmacies, mass distribution, e-commerce, and perfumeries.



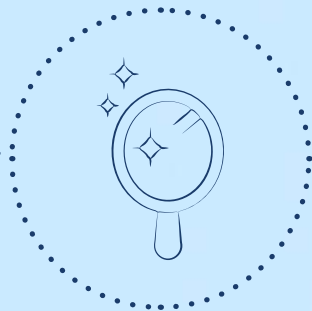
Our Philosophy

At Sodalis Group, we work every day with a clear purpose: to create Wellbeing through our brands and our business. We define ourselves, in fact, as Wellbeing Creators.

Creators because we, the Sodalis People, love to create: starting from an idea and carefully managing each step to turn it into reality. We strongly believe in the power of creativity to find new and distinctive solutions.

Wellbeing, because Wellbeing is the common thread across all our markets: Health, Beauty, Personal and Home Care.

For us, well-being comes from taking care of ourselves, the people we love, and the environment in which we live.



PRODUCTS

We create well-being through our **products**, crafted with great passion and attention to every detail. From the very beginning, we have consistently invested in research, innovation, and the quality of our laboratories and production sites, in order to achieve ever higher standards of performance.



PEOPLE

We create well-being for people:

- **our consumers**, to whom we dedicate ourselves every day, so they can feel good, confident in their own skin, and improve their daily lives;
- **our Sodalis People**, by offering a stimulating, dynamic, fair and inclusive work environment where everyone feels valued and part of the project;
- **our broader community**, through support initiatives, education, and social responsibility efforts.



PLANET

We create well-being for the planet by focusing on our environmental impact and making a positive contribution toward an increasingly sustainable development model. We are fully aware that this is an ambitious journey—but it is one we strongly believe in. We are committed to ensuring that every goal achieved becomes a starting point toward new horizons of well-being.



Our Vision

CREATE **WELLBEING**
THROUGH **BRANDS**
THAT TAKE **CARE**
FOR **PEOPLE**
AND THE **PLANET**



Our Values

Down-to-earth Dreamers

We set ambitious goals to shape the future of our Group. At the same time, we work extremely hard, every day, to give our all and overcome the challenges of the market. We have a pragmatic and concrete attitude, which allows us to focus on the key factors in achieving excellence.

Constant improvement

We believe in continuously upgrading our performance, our business and our organisation. Our focus is on continuous improvement, one step at a time, because there is always something to learn from experience — and perseverance can lead, over time, to truly extraordinary results.

Agility and dynamism

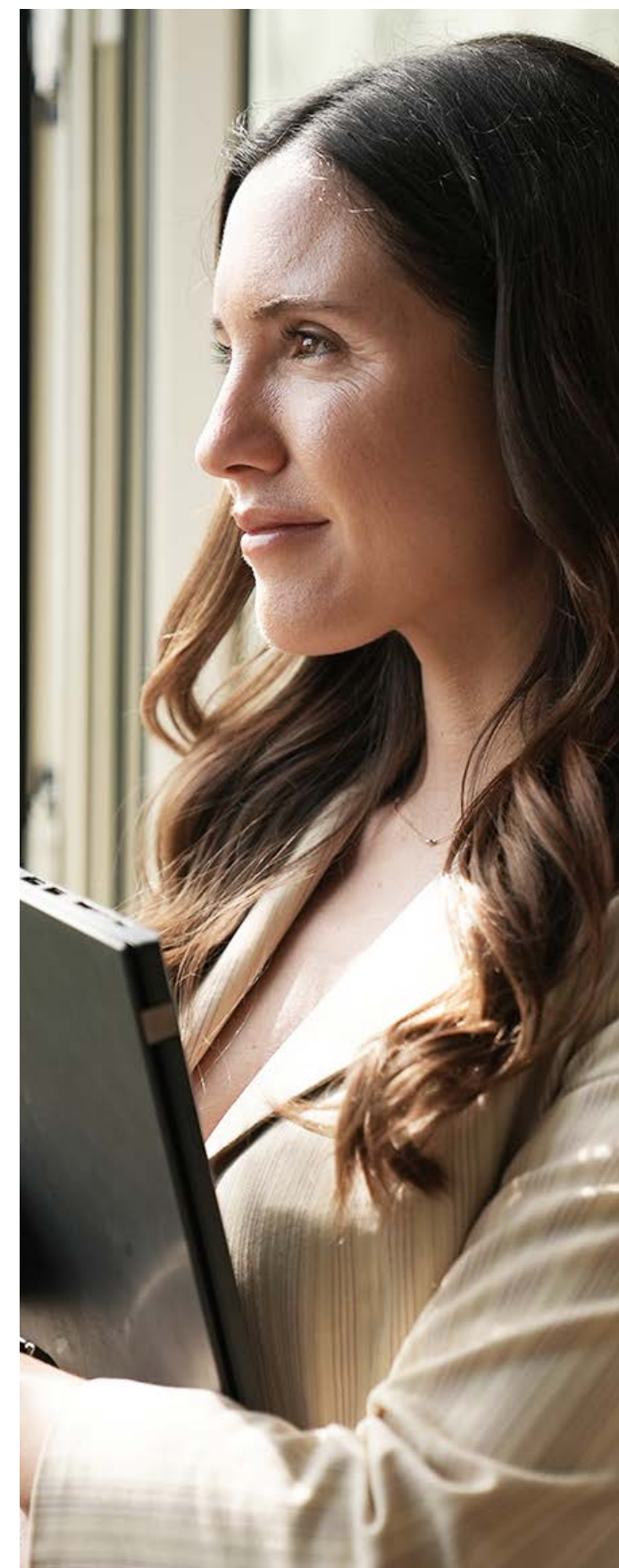
We continuously invest to develop our brands, expand our business, drive research into new products and evolve the way we do business. Our approach allows us to anticipate market trends and implement our strategic moves at maximum speed.

Entrepreneurial mindset

Entrepreneurship is in our DNA. We are always enthusiastic about evaluating and seizing development opportunities and encourage an entrepreneurial approach in all of our talented employees, who have the chance to broaden their perspectives and really make a difference.

Integrity and respect

We feel a strong corporate responsibility to guarantee lasting benefits for all stakeholders. We want to make our best contribution to develop relationships based on fairness and transparency with all our employees, consumers, customers, suppliers and collaborators, support the community and protect the environment.



Fundamental Ethical Principles

INTEGRITY

We act with honesty, ethics, and responsibility in all situations. Integrity builds trust and sets a standard for others, ensuring consistency between words and actions.



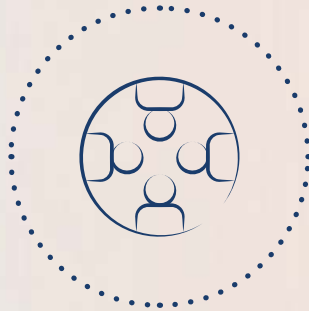
TRANSPARENCY

We are open, clear, and authentic in communications and decisions. Transparency builds trust and helps foster a culture of sharing, where people feel empowered to ask questions and seek clarity.



INCLUSION

We create an environment where every individual feels valued, respected, and empowered to contribute fully. It fosters belonging, participation, engagement and psychological safety, leading to stronger team dynamics.



RESPECT

We treat others with dignity, empathy, and fairness. Respect strengthens relationships, promotes open communication, and encourages a positive workplace culture where everyone can grow.



PEOPLE

We strive to create Wellbeing for people, both inside and outside the Company.

We are committed to making our best contribution by building relationships based on fairness and transparency with all our employees, consumers, customers, suppliers, and partners.

We have always been strongly and concretely connected to the local area and the community in which we operate, fostering positive development.



Human resource management

Sodalis People are the basis of our business success, they are the key asset for building sustainable growth and spreading our Group's culture.

We are committed to creating a **stimulating, dynamic, fair, and inclusive work environment** that values the potential of every talent.

Every decision regarding staff management is based on **merit, skill enhancement, and respect for diversity**, promoting equal opportunities and protecting the rights of all employees.

We promote working conditions that comply with high standards and foster employee wellbeing and continuous professional development, so that each individual can grow and fully express their potential while contributing to the achievement of shared goals.



Gender equality diversity, equity and inclusion (DEI)

We recognize and protect the value of diversity and we are committed to ensuring equity and respect, combating all forms of discrimination.

For this reason, we have planned to implement a **gender equality management system by the end of 2025**, aimed at strengthening DEI within our organization and ensuring an inclusive and stimulating work environment.



Health and safety at work

Our goal is to protect the physical and mental health of people: **we aim to create wellbeing in everyday work life as well.**

We consider health and safety at work to be essential. Through strict prevention policies and compliance with current regulations, we promote a safety culture that involves every level of the organization.





Consumer satisfaction

Strengthening customer relationships and addressing consumer needs are priorities in our daily commitment.

At Sodalis Group, consumer focus is at the heart of everything we do. We are committed to meeting their needs by offering **products that are highly effective, safe, and innovative.**

In our Research & Development centers, we work every day to ensure **excellent formulations in terms of efficacy, tolerability, and environmental compatibility.** We devote great attention to **ingredient selection** and carry out rigorous **quality controls.**



INNOVATION

We continuously collaborate with **specialized laboratories, dermatologists, doctors, universities, and research institutes** during the development, clinical study, and testing phases of our products.

RELATIONSHIPS

We work daily to **strengthen our relationships with clients**, founded on continuous listening and open dialogue.



SATISFACTION

We monitor and analyse **customer satisfaction** and implement engagement initiatives to ensure that needs and expectations are fully met.

Relationships with suppliers

Quality, reliability, and solidity: these are the core principles that govern our relationships with the supply chain.

Supply chain management is a key element in achieving our goal: **delivering excellent products that exceed customer expectations.**

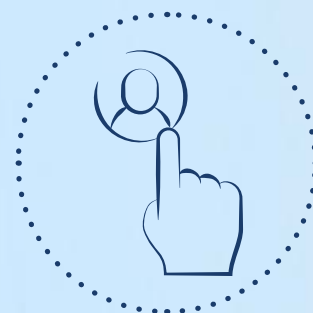
We favour suppliers that hold organizational and product certifications, as these strengthen their reliability and allow us to objectively assess the alignment of their operations with our quality management systems.

We are also constantly seeking **packaging solutions designed according to eco-design principles and with reduced environmental impact.**



OBJECTIVITY

We select our partners according to **objective and transparent** criteria, avoiding any form of favoritism or discrimination, prioritizing those who best meet our technical and production requirements and who share our values and our standards of **quality** and **safety**.



PROXIMITY

We **prioritize suppliers located near our manufacturing plants**: in this way, we select local raw materials, supporting the local community while reducing costs and emissions from long-distance transportation.

88% of our spending is directed toward suppliers of raw materials, packaging, and finished products operating at sites overseen by the Group.



TRANSPARENCY

We regulate our relationships with partners through **clear and transparent contractual agreements** and require that these be respected and honored in good faith.



ACCOUNTABILITY

We work to ensure that payments to suppliers are made punctually and in accordance with contractual agreements, **complying with current regulations** and preventing any abuse or actions that harm the rights of our partners.





Relationships with competitors

We acknowledge the value of fair and transparent competition as a means of continuously improving our offering, fostering market development, and safeguarding consumer interests.

We maintain an attitude of loyalty and respect toward our competitors.

We operate in accordance with competition regulations, avoiding unfair, dishonest, or deceptive practices that could harm the market, our competitors, and consumer interests.

We believe that fair competition fosters **innovation** and **continuous improvement**, helping to create a balanced and advantageous market for all.

We are committed to competing ethically, basing our success on the **quality of the products** and services we offer.

Relationships with institutions, public administration, third party organizations, community

We strive to generate well-being through our business activities, taking into account the economic, social, and environmental context in which we operate.

We maintain constant communication with institutions, public administration, third-party organizations, and the community in general, at local, national, and international level.



At Sodalis Group, we feel a responsibility to contribute to a healthier and more harmonious future.

For this reason:

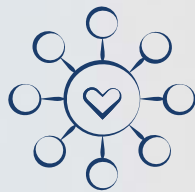
RESEARCH

We contribute to **scientific research and the education of new generations** through the funding of scholarships.



INCLUSION

We support projects that aim at promoting **social wellbeing**, supporting vulnerable individuals, combating gender-based violence, and safeguarding health by promoting prevention.



BIODIVERSITY

We promote projects for the **protection of biodiversity** and natural areas of the marine ecosystem.



DONATIONS

We participate in various causes through the **donation of our products, the purchase of useful goods, and the provision of financial contributions.**

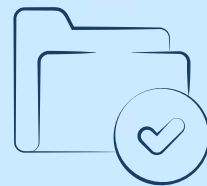




Responsible communication

We believe in the power of effective and consistent communication to convey the reliability of our brands.

We recognize that effective communication is essential to building relationships founded on trust and transparency. For this reason, we are committed to ensuring that the advertising and commercial communications of Sodalis Group are **accurate, clear, truthful, and in compliance with applicable regulations**.



TRANSPARENCY

We are committed to **providing consumers with information that complies** with applicable regulations, is **clear, transparent, and verifiable**, offering not only instructions for the safe use of our products but also information related to the procurement of materials and the proper disposal of products.



CONTROL

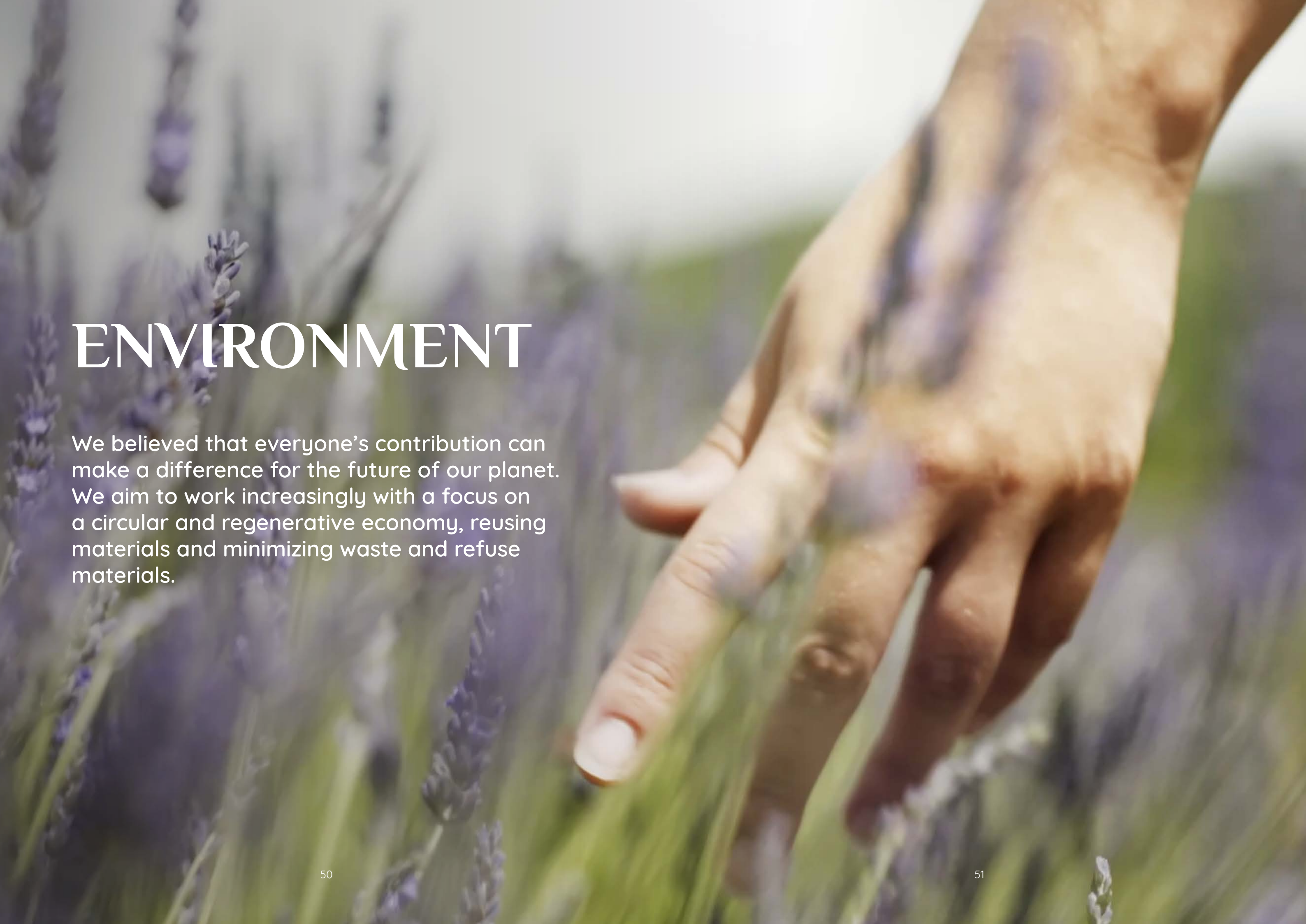
We uphold continuous and rigorous control over all information disclosed and the methods of communication, **ensuring that every institutional and commercial message**, both internal and external to Sodalis Group, is **accurate, clear, and aligned with our ethical principles and applicable regulations**.



TRUTHFULNESS

We maintain constant **oversight of risks associated with unlawful practices** including greenwashing and any other communication that lacks fairness or transparency.



A close-up photograph of a hand reaching out and gently touching a lavender flower. The hand is positioned on the right side of the frame, with fingers slightly curled. The lavender flowers are in the foreground and background, creating a soft, out-of-focus effect. The overall tone is warm and natural, with soft lighting. The background is a blurred field of lavender plants under a bright sky.

ENVIRONMENT

We believed that everyone's contribution can make a difference for the future of our planet. We aim to work increasingly with a focus on a circular and regenerative economy, reusing materials and minimizing waste and refuse materials.

Sodalis Group's commitment to the environment

We are committed to adopting an approach aimed at reducing the environmental impact of our processes and products and promoting awareness among our employees regarding this issue.

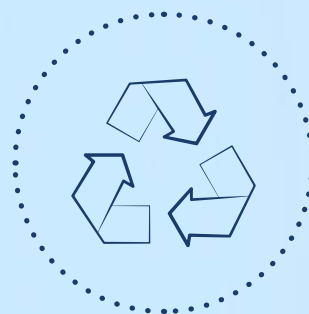
Our aim is **to create Wellbeing in our economic, social and environmental context**. We feel a strong responsibility as a company to contribute to a healthier and more harmonious future for all forms of life.

To this end, we plan and manage our activities with a commitment that goes beyond current regulations, as a fundamental part of our mission: **we work concretely and responsibly to reduce our environmental impact, day by day.**



DESIGN

We develop products with an optimal profile not only in terms of efficacy and tolerability, but also **eco-compatibility**, through our **formulation and packaging choices**.



CIRCULAR ECONOMY

We implement practices that promote the **recovery and reuse of materials discarded** during the production processes.



MONITORING

We monitor and **analyze energy consumption**, implementing targeted actions to reduce and optimize usage.



OPTIMIZATION

We implement innovative technologies and procedures aimed at **reducing water usage**, promoting its reuse where possible.



ENGAGEMENT

We raise awareness among **our employees** and collaborators to adopt **increasingly responsible behaviors** in line with the vision of Sodalis Group.



GOVERNANCE

We guarantee and promote ethical and responsible behaviors.
We implement transparent and ethical corporate governance practices to maintain trust and credibility with all our stakeholders.





Governance's structures: integrity, transparency, responsibility

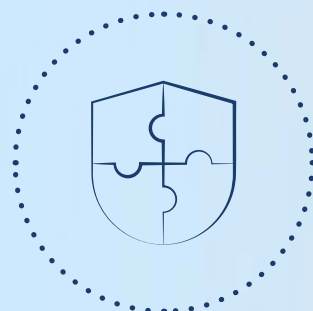
The governance of Sodalis Group is structured to ensure effective and transparent management at all levels.

Sodalis Group's vision and commitment are based on **the strategic integration of sustainability into the governance of each company within the Group.**



VALUES

The values to which our governance system adheres are: **accountability of business functions, transparency and integrity** in both ordinary and extraordinary management, and **ethical and responsible management** of relationships with stakeholders.



TEAM



We are committed to developing a **transparent and responsible governance model**, ensuring consistency and cohesion within Sodalis Group in order to generate a positive impact in the countries and communities where we operate.

The strategic integration of sustainability into the company will be reflected in the organizational structure of Sodalis Group through the creation of the **Sustainability Team**, whose main tasks are to define, implement, and govern sustainability policies and initiatives, raise awareness across all management levels, and ensure the periodic review of our ESG Action Plan 2025-2027.



Prevention of corruption and conflicts of interests

We are committed to ensuring that everyone who is called upon to make decisions does so in the best interest of Sodalis Group and its stakeholders.

At Sodalis Group, **we encourage a rigorous approach to the prevention of corruption and the management of conflicts of interest.** Directors, employees, and collaborators must avoid activities that may give rise to situations of corruption or favoritism, that could compromise their ability to make impartial and objective decisions, or that may conflict with the company's interests.

We require the timely communication of any personal relationships or interests that could compromise the integrity of our choices and decision-making processes.



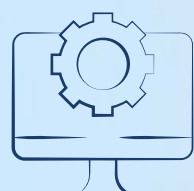
Data protection and cybersecurity

We recognize the importance of cybersecurity as a fundamental element in protecting company information, customer data, and digital operations.

DPO

We guarantee confidentiality and **ensure the proper processing of data**, which must be collected in accordance with fundamental rights and freedoms. Therefore, **we process only the data necessary for specific and legitimate purposes**, retaining them within the limits of the stated purposes.

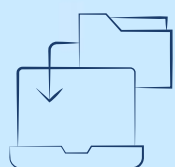
We have appointed a **Data Protection Officer (DPO)** who is capable of providing appropriate responses both within Sodalís Group and to other interested parties who request information regarding the processing of personal data.



IT SYSTEM

We are committed to ensuring the constant protection of IT systems through **the adoption of the most advanced technologies and the continuous training of our employees** via specific training programs.

With this goal in mind, we carefully select all IT service providers to ensure full compliance with the highest industry standards.



PROCEDURES

All **employees are required to comply with current regulations and internal procedures** designed to prevent unauthorized access, data breaches, and misuse of company IT resources.





Monitoring, reports and sanctions

Promptly recognizing ethical behavior is essential to ensuring compliance with our Code of Ethics and the principles that guide us in every field and geographical area in which we operate.

In compliance with applicable laws, we adopt organizational and managerial measures **aimed at preventing unlawful conduct or actions that contradict the principles outlined in this Code** by anyone operating on behalf of Sodalis Group.

Any violations of the Code of Ethics can be reported confidentially through the following page: <https://sodalisgroup.integrityline.com/>

Reports will be handled confidentially to protect the whistleblower from any retaliation and to ensure a thorough verification of the reported facts. It is crucial that each report is supported by clear and detailed information based on concrete facts.

Violations of the Code, depending on their severity and frequency, will be considered disciplinary and contractual breaches, leading to all consequences provided by law and relevant contracts.

We are all responsible for ensuring compliance with the Code of Ethics, fostering a culture of dialogue in which employees and stakeholders can always express their concerns.



To learn more about the activities and projects we support, visit our website and explore our consolidated Sustainability Report.

www.sodalisgroup.com



SODALIS
GROUP

Creators of Wellbeing