



Responsible Marketing Policy

COTY
SINCE 1904



Coty’s Responsible Marketing Policy Revision History

Current Version	Version Date	Effective date	Author	Major Changes	Approval
1.0	June 2024	June 25th, 2024	Corporate Affairs	New Policy	Executive Committee

This Responsible Marketing Policy (this “Policy”) is binding on all Coty personnel. This Policy applies to all work, or services performed for or on behalf of Coty¹.

Our Policy Commitment

At Coty, our purpose is to unleash every vision of beauty, and responsible brand marketing is essential to bringing this to life. We acknowledge we have a responsibility to respect the human rights of our consumers, and believe our brands have an important role to play in challenging beauty stereotypes and championing self-expression.

Our commitment to inclusivity and strengthening brand equity guides every aspect of our brand expression. We believe in creating visual representations that are welcoming and inclusive of all individuals, while also being tailored to resonate effectively within different channel environments, whether it's in-store, on TV ads, social media, or one-to-one marketing initiatives. As ever, we remain dedicated to targeted marketing strategies that ensure our assets are considerate of sensitivities and contexts wherever we operate.

Our Responsible Marketing Policy is inspired by the International Chamber of Commerce (ICC)’s Advertising and Marketing Communications Code, while we also comply with Coty policies, procedures and local laws and regulation in all the markets we operate in. Coty is constantly monitoring its initiatives to ensure the effective adoption of this Policy and will adapt the policy as the landscape evolves.

Scope of Commitment

Coty is committed to the responsible marketing of all our brands and products*.

This policy applies to all Coty employees, as well as marketing and promotional activities under Coty’s direct control (including its agencies and/or other third parties). This includes but is not limited to: **product development** including packaging, and labelling; **advertising and direct marketing** including TV / cinema, radio, print, digital and online (including company-owned websites); **promotional activity** including events, product placement, interactive games, brand partnerships and sponsorship; **influencer marketing**; **sales materials** instore and point of sale; **market research**.

Forms of marketing communications which are not under Coty’s direct control are not covered by this policy.

Our Responsible Marketing Principles and supporting Playbook are available to all our employees on our internal communications channels.

Coty’s Responsible Marketing Principles

Coty will ensure advertising and data collection is RESPONSIBLE by:

- **Producing honest advertising** that accurately represents our products and only makes substantiated claims. This includes ensuring marketing does not mislead on sustainability-related (environmental and social) aspects of a product or imply a brand is more sustainable than it is.

¹ The term “Coty” refers to Coty Inc. and its subsidiaries globally.

- **Respecting and adhering to all applicable marketing and data protection laws** and regulations in every market in which we operate.
- **Developing marketing communications that are clearly distinguishable.** Where appropriate, such as paid advertising in editorial/news/influencer content, we work with publishers/partners to request that it is labelled as such and our identity as the marketer is apparent.
- **Respecting the right to data privacy**, including restricting the collection and use of customer data to only those over the age of 13, in line with applicable data privacy laws – such as GDPR.
- **Placing our advertising in an environment that does not perpetuate negative social issues** (stereotypes, self-esteem, shaming, exploitation etc.) and reflects the positive and diverse image of our brands.
- **Targeting appropriate customers**, considering the type of product being marketed and how your message will be received by vulnerable consumers.
- **Do not create marketing campaigns directed at children** under the age of 16.
- **Avoiding inappropriate product categories** and industries for promotional partnerships and activities (e.g. alcohol and cigarettes).
- **Not denigrating a competitor** in any Coty-controlled activity.

Coty will celebrate and reflect the DIVERSITY of our societies, through a more INCLUSIVE expression of beauty by:*

- **Ensuring Coty and our owned brands* never alter the permanent features** or body shape of our models through photoshop or photo editing and collaborating with our fashion house partners aiming to meet this same standard.
- **Selecting models, influencers and partners who reflect Coty’s purpose, vision and values, our brand values, and those of our customer base.** This includes representing the diversity of beauty in our societies – aiming to include all genders, races, backgrounds, religions, abilities, ages, sexual orientation, and body types.
- **Only using models and engaging in any way (paid or not) with influencers who are over the age of 16.**
- **Respecting the dignity of all cultural, social, religious, and ethnic groups.** When drawing inspiration, we will take steps to ensure our marketing shows sensitivity and awareness and is created with support from, and in cooperation with, relevant stakeholders.
- **Ensuring marketing does not offend standards of decency** prevailing in the applicable country and culture. This includes, but it is not limited to, avoiding the use of violent or hypersexualized imagery.
- **Striving to use inclusive and sensitive language** that does not exclude or offend any origin, age, gender, ability, sexual orientation, socio-economic, cultural, religious, or ethnic groups or perpetuate negative social issues.
- **Ensuring our content is accessible** - removing barriers to communication and interaction - and in accordance with all accessibility laws where we operate (websites, owned social & paid environments).
- **Limit use of non-domesticated animals** or animals with cultural or religious sensitivity in our advertising.

** For all Coty’s owned brands (these are marked with an asterisk in our Annual Financial Report) and, where possible, our licensed brand partnerships. The brand equity of our licensed brands is owned by our licensors. This means that the licensor has final approval of our advertising and communication content. In addition, Coty partners and finds synergies with our licensors on how and where we advertise.*

Guidance on our Principles

Our brands have an important role to play in society by challenging stereotypes and championing individuality and self-expression. Responsible marketing is an important part of authentic advertising. To provide clarity on our principles, please see the guidance below.

If you have any further questions, please reach out to the Responsible Marketing Taskforce at Responsible_Marketing@cotyinc.com.

Consequences for Failure to Comply

Enforcement of this Policy will be the responsibility of Corporate Affairs with the support of Legal and Compliance. Coty takes allegations of misconduct seriously and is committed to taking any and all appropriate actions based on the type and severity of the allegations. Personnel who violate any provision of this Policy are subject to disciplinary action in accordance with Coty's Code of Conduct and Global Policy and Procedure on Managing Allegations of Misconduct. The decision to commence an internal investigation may be a matter of policy, regulation, or left to the discretion of the Compliance leaders. Serious violations might lead to a full internal investigation.

Administration of this Policy

Coty expressly reserves the right to change, modify or delete the provisions of this Policy without notice. Any minor revisions to this Policy will be published on Workplace and any major revisions will be announced and training updated accordingly.

You are responsible for consulting and complying with the most current version of this Policy. If you have any questions regarding this Policy that are not addressed in this Policy, please contact the Corporate Affairs team.

Conduct Not Prohibited by This Policy

This Policy is not intended to restrict communications or actions protected or required by applicable state or federal law, including, without limitation, under the National Labor Relations Act, such as communicating, or otherwise acting together (including through or using third parties and/or mediums such as social media platforms), with co-workers, a labor organization (or representative thereof) or a federal or state administrative agency, in each case, to address wages, benefits or terms and conditions of employment at Coty, or otherwise with respect to any government agency or self-regulatory organization.
