



THE COTY CODE OF CONDUCT

March 2024

Everyone at Coty¹ 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. We expect you to use good judgment and common sense to comply with the letter and spirit of our Code of Conduct and our other policies every day in everything you do.

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

As an expression of our corporate values, all business must be conducted in accordance with the Code of Conduct and in compliance with all related policies, applicable laws, rules, and regulations. Our Code of Conduct applies to all employees, directors, legal representatives, ambassadors, contractors of Coty, Coty subsidiaries and joint venture companies, regardless of their position, location or function.

Each of us is 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, 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.

If you are aware of a breach, or potential breach, of this Code of Conduct, laws, or Coty policies, or you have any questions on the Code of Conduct, please reach out to:

- Your Manager
- Your HR Business Partner
- Your Compliance Officer
- The Global Compliance Officer
- The Legal Department
- The Coty Ethics & Compliance Hotline which provides the option to raise your questions or concerns anonymously, if preferred,² and is available for use by both employees and the wider public, 24 hours a day. The ethics & Compliance Hotline can be reached at hotline.coty.com

Ethics and Compliance issues are overseen by the Audit and Finance Committee and the Coty Board of Directors. All employees (including part-time ones and fixed-term contractors) are trained on our Code of Conduct.

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

² In France - solely for matters in the field of accounting, finance, banking and anti-corruption, or matters relating to Section 301(4) of the Sarbanes-Oxley Act or to anti-competitive practices.



Further information and guidance on the individual topics contained in this Code of Conduct can be found at the Coty website (www.Coty.com). The relevant telephone hotlines for specific countries can be accessed via web at hotline.coty.com. In the US, please phone **800 461 9330** (toll free number) – for other locations and toll-free numbers, please also refer to hotline.coty.com.



Message from the Chief Executive Officer

Dear Colleagues,

Since 1904, Coty has fearlessly pioneered innovation across the beauty industry. We are a company with a history of firsts.

Many of our iconic brands defined the beauty landscape which we are so familiar with today. From Rimmel creating the first mascara, to Covergirl pioneering clean make up, to Lancaster mastering the science of encapsulation. And Francois Coty himself opening up fine fragrance to all of society.

We believe that science and passion are the driving force behind transformation, and our mission is to create forward thinking beauty products that provide new, innovative and simply better science-based solutions.

We have been entrusted with a great name and a proud legacy on which to build. This legacy places a real responsibility on each of us to preserve and enhance the reputation of Coty for generations to come. I expect every associate to remain true to the company's principles; for each of us to live these values in our work and in every engagement with colleagues and external stakeholders.

These values are:

FEARLESS KINDNESS TO OURSELVES

- I am good to me – *Wellbeing*
- It's good to be me - *Individuality*
- I embrace every part of me – *Acceptance*

FEARLESS KINDNESS TO OTHERS

- All are welcome – *Inclusion*
- We are a magnificent medley – *Diversity*
- We are one – *Unity*

FEARLESS KINDNESS TO THE PLANET

- We do better with less – *Sustainability*
- We do what's right - *Integrity*
- We value all life – *Compassion*

This Code of Conduct is designed to guide us all, so that we will conduct ourselves in a manner that matches the highest standards that we set for our people and our products. The Code applies to every director, officer, employee, and contractor of Coty globally - without exception.

The Code sets a clear expectation on the standards to be followed in all work-related activities, regardless of business pressures. This includes the recognition and expectation that employees in managerial roles have an added responsibility to lead by example and ensure that the Code is followed by those under their supervision.



Please get in touch if you witness misconduct. You can do this by emailing the contacts listed in this document or by calling one of the Hotline numbers (which you may choose to do anonymously, should you prefer, and in complete confidence). We will always take your concerns seriously.

Finally, I would like to thank you for your continued hard work, dedication, and commitment to upholding these standards. Together, we will make incredible things happen as we write the next chapter of this great company. Together, we will make over the world of beauty.

Best regards,

Sue Y. Nabi
Chief Executive Officer



SINCE 1904

Table of Contents

1. Applicability of the Code of Conduct
2. Coty Hot Line, Good Faith Reports & No Retaliation Policy
3. Compliance with Laws, Regulations & Company Policies
4. Managing Allegations of Misconduct
5. Discrimination, Harassment & Bullying
6. Sexual Harassment
7. Health & Safety
8. Safe Workplaces
9. Commitment to International Frameworks, Respecting Human Rights and Labor Rights
10. Product Safety
11. Protection of Data Privacy and Information Security
12. Conflicts of Interest
 - a. Charitable Donations and Outside Activities
 - b. Ownership or Financial Interest in Other Businesses
 - c. Acceptance of Gifts, Entertainment, Loans or Other Favors
 - d. Gifts to Colleagues
 - e. Gifts from Coty to Employees or Discount Sales
 - f. Gifts & Entertainment to Government Officials
 - g. Gifts & Entertainment to Business Partners
 - h. Returning or Refusing Gifts and Entertainment
13. Anti Money Laundering
14. Prohibition Against Bribery of Government Officials
15. Prohibition Against Private Sector Bribery
16. Political Contributions, Donations and Sponsorships
17. Responsible Lobbying
18. Intellectual Property: Patents, Copyrights & Trademarks, Sensitive, Proprietary or Confidential Information
19. Company Confidential Information
20. Social Media Principles
21. Disclosures, Use & Recording of Corporate Funds
22. Responsible Tax
23. Insider Information
24. Company Documents
25. Sustainability
26. Fair Dealing & Compliance with Antitrust Laws
27. Truthful Advertising and Responsible Marketing
28. Gathering & Maintaining Competitive Information
29. Company Assets, Safeguard of Employee Information and Information Security
30. Compliance with Trade Restrictions
31. Compliance with Coty's Principles for Business Partners



1. Applicability of the Code of Conduct

The policies outlined in our Code of Conduct must be respected, understood and followed by everyone who acts on behalf of Coty. This includes all employees, directors, legal representatives, ambassadors and contractors of Coty, Coty subsidiaries and joint venture companies, regardless of their position, location or function.

We expect everyone working on Coty's behalf to understand and comply with our ethical standards as outlined in our Code of Conduct. You 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 of Conduct as well as the third party. Any employee who violates the Code of Conduct and related policies is in breach of these rules and acting outside the scope of his or her employment contract and will be subject to disciplinary actions, up to and including termination of employment.

The Compliance Team, together with the Audit and Finance Committee of the Board of Directors, are responsible for overseeing the interpretation and enforcement of the Code of Conduct.

Only the Audit and Finance Committee, the Chief Legal Officer and the Global Compliance Officer may, in their sole discretion and based on results of internal investigations, waive provisions of this Code of Conduct. All waivers or changes to this Code of Conduct must be publicly disclosed (to the extent required) in a manner that complies with the requirements of the SEC, the listing standards of the New York Stock Exchange, Euronext Paris, and any other applicable regulations.

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

If you have any questions or concerns regarding the Code of Conduct 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 of Conduct, 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. If you are unsure about any action, you must seek and receive advice BEFORE proceeding – reach out to your Manager, HR Business Partner, local Compliance Officer, Global Compliance Officer or Legal Department.

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. Retaliatory acts will be dealt with seriously and may lead to disciplinary action against the person responsible for such retaliation, up to and including termination of employment.

A good faith report means that you have provided all the information you have, and that you believe to be true. At the same time, if you report something in bad faith, with a clear purpose of jeopardizing someone's position at Coty or to harm Coty's business, you will be subject to disciplinary measures, up to and including



termination of employment. If you believe you have experienced retaliation, you are encouraged to report it immediately.

Even if you believe that no action was taken after your report was submitted, no one can conduct independent or preliminary investigations unless authorized in writing by the Global Compliance Officer. If you believe no action has been taken, immediately reach out to your Manager, HR Business Partner, local Compliance Officer or the Legal team and share your concerns. In order to preserve confidentiality for all involved parties of a Compliance case, only the relevant and affected parties of an investigation will formally receive feedback on the investigation results.

If you choose to report any issue, especially if you decide to do so anonymously, we encourage you to provide as much information and as many details as possible so that any investigation into the alleged violation may be conducted in an expeditious, thorough, and appropriate manner. Do not be afraid to share details (including dates, names, documents, e-mails, photos, etc.) as reports made in good faith are valuable assets to the Coty Compliance Program's effectiveness.

When an investigation takes place, we expect employees that are part of the process to fully cooperate by providing truthful and accurate information to the investigation team. Coty will not tolerate any lying to investigators or obstructions to an investigation.

3. Compliance with Laws, Regulations & Company Policies

Behavior that violates the Code of Conduct may also violate local laws, subjecting those personnel involved to prosecution, fines, and in some cases, imprisonment. Coty business shall always be conducted in compliance with all applicable internal policies, laws, rules, and regulations - for every country where it has operations. It is the responsibility of every Coty representative (including, but not limited to, employees or contractors) to comply with all applicable laws and governmental regulations at any level in the states and countries in which Coty operates. Failure to obey these rules constitutes, among other possible violations, a breach of our Code of Conduct. Any suspected illegal action will be promptly addressed and investigated, which may result in reports to the appropriate authorities and/or eventual disciplinary actions, including termination of employment.

Coty will take appropriate measures, not only against those found responsible for any illegal actions, but also against those who fail in their duty of oversight, supervision, and control. Coty requires every Coty representative (including but not limited to employees or contractors) to immediately report a violation of which they are aware through the appropriate channels.

4. Managing Allegations of Misconduct

Coty takes allegations of misconduct very seriously and is committed to taking any, and all, appropriate disciplinary actions based on the type and severity of the allegations raised. The decision to initiate an internal investigation may be a matter of policy, regulation, or left to the discretion of the Compliance function. Not every case that raises the possibility of a violation merits a full internal investigation and a short or limited inquiry or pre-inquiry may be sufficient to determine facts and provide a basis for response. Coty may also decide to initiate a formal investigation involving employees, leaders or third parties to ensure its compliance



with the Global Policy for Managing Allegations of Misconduct. In any case, all internal investigations are governed by the following golden rules and apply to all investigation procedures:

- Good faith: all allegations reported are taken seriously and presupposed to have been made in good faith, without a purpose of jeopardizing someone's position or harm Coty's business interests.
- Cooperation: Employees are expected to cooperate with inquiries and investigations by providing truthful information and relevant documentation in response to questions. It is the Company's expectation that any party interviewed during an investigation be truthful and provide complete answers to interview questions. Employees who fail to cooperate, make false statements, or otherwise impede an internal investigation may be subject to disciplinary action, up to and including termination, subject to any applicable laws.
- Non-retaliation: Coty is committed to fostering an environment where individuals feel safe raising concerns of possible misconduct. Retaliation against any person for raising good faith concerns of misconduct and/or participating in an investigation is contrary to Coty policy and will not be tolerated.
- Confidentiality: Every aspect of an investigation should be kept confidential. The fact that an investigation is underway, its subject matter, the processes followed, the materials gathered and, especially, the results of the investigation must always be treated confidentially. This principle is critical to the integrity of the overall investigation process.
- Objectivity and impartiality: All matters are investigated in the same manner, with the same professional, impartial, and objective treatment. All information must be reviewed and analyzed using the same standards. The findings of an investigation should be based on facts, and not an opinion filtered through the investigator's personal value system.

Until a report has been issued and an allegation has been substantiated, there is no confirmation of any wrongdoing.

5. Discrimination, Harassment & Bullying

Coty's greatest strength is our people. Everyone must be treated with dignity and respect. As part of its values Coty does not tolerate any employee discrimination, harassment or bullying. We are committed to ensuring a safe working environment based on respect for all. Coty representatives (including, but not limited to, employees or contractors) must follow and support this policy. Failure to comply with these rules is a violation of this Code of Conduct and may be subject to disciplinary action, including termination of employment.

We are committed to providing equal employment opportunities and healthy work environments for our 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. As a member of our community, you are expected to help prevent or eliminate discrimination, harassment and bullying by examining your own behavior on the job and supporting our policy. If you are confronted with an inappropriate situation, you should report it and not allow it to continue, regardless of who is creating the situation.

6. Sexual Harassment

As part of its values, Coty does not tolerate any sexual harassment towards its employees. We are committed to ensuring that all our employees work in a safe environment based on respect for all. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when (a) submission of such conduct is, explicitly or implicitly, a term or condition of employment, (b) an employee's response to such conduct is used as the basis for employment decisions, or (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating a hostile, intimidating or abusive work environment. Sexual harassment is prohibited towards anyone, regardless of whether the employee accepts or rejects the advance.

Sexual harassment can include, but is not limited to, behavior at work or at a Coty-sponsored event. All employees are expected to help prevent or eliminate sexual harassment by examining your own behavior on the job and supporting our policy. If you are confronted with an inappropriate situation, you should report it and not allow it to continue, regardless of who is creating the situation.

7. Health & Safety

We are committed to providing a safe and healthy work environment for all. Coty complies with occupational health & safety rules and regulations where it has operations. We expect you to help protect your own safety, and the safety of your fellow employees, by being aware of, and following, all health and safety rules, and by exercising caution in all work-related activities. We are committed to ensure awareness about health and safety issues in the workplace as well as to reduce stress and promote well-being. Your responsibilities as a Coty employee include, but are not limited to:

- Comply thoroughly with all health and safety instructions and immediately report any inaccuracies, gaps, or missing signs.
- Always exercise the highest care and good judgment to prevent accidents and injuries. Report to supervisors and seek first aid for all injuries, regardless of how minor they may seem.
- Report any unsafe working conditions, equipment, or practices to supervisory personnel. Escalate matters to a higher ranked person on site, if necessary.

Promoting a safe and healthy work environment also means we commit 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.

Any employee who believes that their working hours are excessive, in relation to the local rules governing their employment contract, must refer the matter to HR without delay, so that the necessary corrective measures can be taken.

In addition, any employee who believes that their working environment is likely to have an impact on their mental health must also refer the matter to HR without delay so that necessary corrective measures can be taken.



Acts or threats of violence in the workplace will not be tolerated. As part of our commitment to providing a safe work environment, we never engage in, or tolerate, any form of violence. At Coty, “violence” includes threats or acts of violence, intimidation of others or attempts to instill fear in others.

Weapons of any kind are not allowed to be brought by employees in the workplace. If you believe someone is in danger you should immediately seek help by contacting your manager, Human Resources, local security team, your local Compliance Officer, the Global Compliance Officer, the Coty Hot Line, or local law enforcement officers.

Our workplace is no place for illegal drugs or alcohol. As a company, we are dedicated to creating a work environment that is free from the use and abuse of illegal or controlled substances. While in the workplace or on Coty business, employees are strictly prohibited from engaging in the following conduct:

- Consumption of alcohol, other than at specially designated Company-sponsored events under the guidelines provided herein;
- Non-prescriptive use, possession, distribution, sale, purchase, manufacture or transfer of controlled substances.
- Use, possession, distribution, sale, purchase, manufacture or transfer of any kind of illegal drugs or illegal substances.
- Reporting to work, or performing work, while under the influence of alcohol, illegal drugs and/or non-prescriptive controlled substances.

Employees whose job responsibilities involve entertaining guests, clients or others may be involved in situations where alcohol is served, or, from time-to-time, Coty offices may sponsor specially designated events where alcohol is served. However, it is the obligation of these employees who may consume alcohol while at such events to do so responsibly and in moderation as they are Coty representatives. Excessive consumption of alcohol while on Coty business will not be tolerated. You should never drive a vehicle of any kind while on Coty business, going to or coming from Coty premises or Coty related events when under the influence of alcohol, illegal drugs or controlled substances.

8. Safe Workplaces

We are committed to the following principles: Providing a positive work environment for all, with opportunities for work that is both productive and delivers a fair income, safety in the workplace and social protection, freedom for people to express their concerns, organize and participate in the decisions that affect their lives and equal opportunity and treatment for all employees.

9. Commitment to International Frameworks, Respecting Human Rights and 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:

1. Convention no. 87 and no. 98 regarding the freedom of association and the effective recognition of the right to collective bargaining.
2. 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.
3. 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.

10. Product Safety

Ensuring the safety of our products is critical to our success and to the well-being of our consumers. Product safety and quality are very important to us at Coty. Our products have always been formulated with the utmost safety and quality in mind. We are proud of our products. We will continue to monitor all available scientific information impacting our products and ingredients and will implement whenever possible all changes that will enhance the safety of our products. Coty is committed to developing, producing, marketing and selling all its products and services responsibly, including being sensitive to the possible reaction of religious, ethnic, cultural or social groups to our advertising.

Product safety is a critical aspect of quality, and you must do your part to ensure that: (i) our products and packages are safe for consumers and the environment when used as intended; and (ii) Coty meets or exceeds all applicable legislative and regulatory requirements related to product safety and labeling.

All employees concerned with quality and safety issues should be aware of and follow the Coty policies and procedures designed to protect the quality and safety of our products, and raise concerns with the Quality function in Supply Chain, R&D or the Global Compliance Officer promptly.

Any concerns should be immediately reported to Supply Chain, R&D or the Global Compliance Officer.

11. Protection of Data Privacy and Information Security

One of Coty's core assets is Personal Data, whether it relates to its own workforce, customers, consumers, suppliers or other business partners. The proper treatment of Personal Data is vital to Coty's success and key to building trust and confidence. The Coty Global Data Privacy Policy supports the Coty Code of Conduct and defines the global standards for ensuring that Coty protects Personal Data and commits to respecting Individuals' rights in relation to their Personal Data.



To help achieve this, Coty has developed a data protection framework of policies, procedures, training and guidance to demonstrate its commitment to safeguarding Personal Data and handling such data in accordance with Applicable Data Protection Laws.

During your employment, you may provide sensitive personal, medical and financial information to Coty. Coty is committed to respecting the right to data privacy and to protecting personal data and information, as enshrined in Article 12 of the Universal Declaration of Human Rights and Article 17 of the International Covenant on Civil and Political Rights, whether in paper or electronic format as per its Global Data Privacy Policy. You must not access co-workers' sensitive information without specific authorization and only with respect to the requirements of the applicable law and Coty Global Data Privacy Policy. If you do have access to such type of information because of the nature of your job, you must strictly follow Coty Data Privacy.

Subject to legal requirements, in line with Coty IT Policies, Coty reserves the right to monitor, access, review, copy and disclose computers, professional emails, internet use, discussions via messaging applications, Coty-related social media accounts or other postings about Coty from its employees, customers and business partners, to ensure compliance with the laws to which we are subject globally. Coty employees may be required to provide their company or personal devices that may contain Company information in connection with any investigative matter, subject to applicable laws.

12. Conflicts of Interest

A conflict of interest is any circumstance that could cast doubt on an employee's ability to act appropriately regarding Coty's best interest 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 another employee, supplier, competitor or 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 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 your motivation or performance.

Before taking any action which could possibly constitute a conflict of interest, and to avoid potentially damaging effects both on you and Coty, you must make prompt disclosure to your Manager, Human Resources, your local Compliance Officer, the Global Compliance Officer or the Coty Hotline of any fact or circumstance that may involve a conflict of interest or the appearance of a conflict of interest. This disclosure can assist in resolving doubts as to whether an activity is permissible or not. If permissible, mitigants will be put in place by the Compliance team.

Even with the best of intentions, the mere appearance of a conflict of interest can be as damaging as an actual conflict, and you should avoid any activities that create the appearance of a conflict of interest. A

good general rule is to avoid any action or association that could be embarrassing to you or Coty if it were disclosed to the public.

a. Charitable Donations and Outside Activities

While we are encouraged to participate in civic, charitable or professional activities, those activities must not interfere with job duties and cannot be shared as Coty initiatives. You must not use Coty's name in connection with an outside activity without first obtaining the written approval of a member of Coty's Global Corporate Affairs team.

b. Ownership or Financial Interest in Other Businesses

You must never let your personal interests keep you from making unbiased business decisions as a Coty representative. Coty respects the rights of its employees to manage their affairs and investments, and we do not wish to infringe on employees' personal lives. However, all directors, officers, employees and contractors should avoid situations that present a conflict or the appearance of a conflict between their interests and those of Coty.

You should not conduct your own personal or additional business activities, or any activities for a third-party employer, during Coty working hours, while on Coty premises or while using Coty devices. To the extent that you offer your employment, consulting or volunteer services outside of the Coty employment relationship, you should honor all obligations of confidentiality that are owed to Coty.

c. Acceptance of Gifts, Entertainment, Loans or Other Favors

Conflicts of interest may arise from receipt of gifts and entertainment by an employee from a vendor, contractor or related third party. Gifts and entertainment include (but are not limited to):

- Corporate branded items
- Cultural courtesies
- Business gifts
- Travel or accommodation associated with a business conference, meeting or event
- Business meals and refreshments
- Tickets to sports, music or cultural events

You must not seek or ask for any gift or entertainment from a supplier or contractor who is currently dealing with Coty or who may do so in the future. Coty prohibits the acceptance or receipt of any gratuity or entertainment from a current or potential contractor, supplier or customer if it is of a type that goes beyond common courtesies generally offered to third parties and exceeds a value of more than USD 50.00 (or the local currency equivalent to such amount).

You should not accept a gift or entertainment (or other item of value) from a supplier or contractor if it might reasonably appear that you are being influenced to impair your judgment or actions in the performance of supplier or contractor duties, or if an appearance of impropriety would be created. If you have any doubts or concerns whether it is permissible to receive a gift or entertainment which has been offered to you always first contact your local Compliance Officer, the Global Compliance Officer or Coty Hotline.

d. Gifts to Colleagues

Employees may provide gifts or entertainment to fellow colleagues as long as the gifts or entertainment are in good taste, reasonable and appropriate, and paid for by the employee and not expensed to Coty. Personal gifts to employees should not be provided as performance awards. Gifts or entertainment offered to or received from fellow colleagues do not need to be disclosed to Coty.

e. Gifts from Coty to Employees or Discount Sales

Coty may, at its sole discretion (i) provide its own products as gifts to employees; (ii) provide entertainment to employees; or (iii) sell its own products to employees at a discounted price. Any gifts, entertainment, or discounted product that is given to Coty employees is on the condition that such gifts, benefits or products are for such employee's personal use only and cannot be sold. For the purposes of this provision, personal use means the use of products by the employee or its immediate family and/or gifting to friends and family. Coty reserves the right to apply disciplinary measures, including and up to termination, if an employee misappropriates (such as through a sale) any such products or other offerings.

f. Gifts & Entertainment to Government Officials

As a Coty representative you are expressly prohibited to give any Thing of Value (as defined below in Section 14) to a Government Official (as defined below in Section 14) in any country, without the express consent of the Global Compliance Officer, after consulting with the Legal Department.

g. Gifts & Entertainment to Business Partners

Coty employees or those acting on Coty's behalf may, on a case by case basis, provide meals, gifts or entertainment to others as part of the conduct of business, as long as (i) the gifts do not violate applicable law, including any applicable local laws, regulations or industry codes to which Coty has agreed to adhere; (ii) do not violate the standards of the recipient's organization; and (iii) the provision of the meal, gift or entertainment does not go beyond common courtesies consistent with ethical business practices and their value does not exceed the equivalent of USD \$200.00 or the local currency equivalent to such amount. In the event the Coty's business partner is a Government Official, Coty employees must seek the express consent of the Global Compliance Officer, after consulting with the Legal Department, per Section 12.f.

When gifts are permitted, under the terms and conditions of this Code of Conduct, they must never be made on a regular or frequent basis. Cash or cash equivalent (such as vouchers or pre-paid cards, for example) gifts are expressly prohibited. Providing and receiving entertainment of a sexual nature or entertainment having sexual overtones is strictly prohibited. Any breaches of these policies is subject to disciplinary measures, up to termination.

You should not provide a gift, meal or other item of value if it might reasonably appear that you are trying to influence the recipient's judgment or actions in the performance of his or her duties, or if an appearance of impropriety would be created. If you have any doubts or concerns if you can or cannot provide a gift or entertainment, always contact your local Compliance Officer, the Global Compliance Officer, or Coty Hotline.

h. Returning or Refusing Gifts and Entertainment

Under certain business circumstances and cultures, rejecting a gift or entertainment is not acceptable and/or might harm our business relationship with specific clients due to their cultural practices. Also, sometimes, returning the gift after it was delivered to a Coty facility is impossible or highly costly. If you are faced with one of these circumstances, please immediately deliver the gift received to your local Compliance Officer or Human Resources so that it can be appropriately handled (such as through donation by Coty to a charitable organization or raffled between all employees, if possible).

13. Anti Money Laundering

International laws, including Europe and the United States, prohibit financial transactions that involve the proceeds of illegal activities and that are designed to conceal the source, ownership, or control of those proceeds. U.S. law also prohibits the movement of funds across a U.S. border with the intent to promote illegal activity, conceal proceeds from illegal activity, or avoid a transaction reporting requirement. When are working with vendors, suppliers, or other parties to which Coty makes payments, you should always be aware of suspicious activities and look for red flags that may help you identify money-laundering schemes.

You must not participate in or facilitate money laundering. Doing so, even unintentionally, could result in civil and/or criminal penalties against you and/or Coty. Therefore, you must:

- know your responsibilities by familiarizing yourself with the Coty Anti-Money Laundering Policy.
- not engage in conduct that is designed to, or does evade or avoid, Coty's internal controls.
- know your clients and vendors, obtaining all client and vendors identification information required by laws, regulations and Coty policies.
- be alert and promptly report any adverse media, or other information available in the public domain related to clients or vendors that you identify during throughout the relationship with Coty that could be relevant to AML purposes.
- For all Coty transactions, ensure that funds used to purchase Coty products are from legitimate sources and such funds do not constitute proceeds of criminal conduct or proceeds of terrorism financing.

Coty employees should immediately contact your local Compliance Officer, the Global Compliance Officer, or reach out to the Coty Hotline if they have suspicions about actual or potential money laundering activity.

14. Prohibition Against Bribery of Government Officials

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 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 third party (agents, agencies, consultants, intermediaries, joint venture partners, distributors and third-party representatives acting on Coty's behalf) will involve the same risk and consequences for Coty and the Coty employee 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 for Coty and the Coty employee who has authorized the offer, payment or transfer as one made directly to the government official.

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.

The laws to which Coty is subject generally contain an expansive definition of "Government Official". Under most such laws, government officials include:

- Elected or appointed officials, whether serving at the national, regional or local level of any government, anywhere.
- Officers and employees of state-owned (or even partially state-owned) or state-controlled entities.
- Persons who are acting for or on behalf of a government or state-owned (or even partially state-owned) or state-controlled entity.
- Political party officials as well as any person who is acting on behalf of a political party official.
- Candidates for public office as well as any person who is acting on behalf of a candidate for public office.
- Any officer or employee of a public international organization such as the United Nations or World Bank as well as any person who is acting on behalf of an officer or employee of such an organization.
- Anyone acting in an official or unofficial capacity on behalf of any of the above.

A Thing of Value is anything that the recipient might value, such as a financial or other advantage, including, but not limited to, cash, gifts, gift cards, valuable items with Coty's logo, electronic equipment, clothing, meals, entertainment, travel, lodging, transportation, loans, use of property or equipment, charitable donations to suggested charities, political contributions, club memberships, medical treatment and job or internship offers, etc.

This provision applies to all Coty directors, officers, employees, representatives and contractors, regardless of citizenship or location of employment. This provision also applies to agents, agencies, consultants, intermediaries, joint venture partners, distributors and third-party representatives acting on Coty's behalf.

If you feel compelled to make a payment otherwise prohibited by this Code of Conduct to escape an imminent threat to your life, health or safety, you can proceed with such payment immediately. In these cases, you must, as immediately as possible, report the payment and details regarding the incident to your local Compliance Officer or Global Compliance Officer.

15. Prohibition Against Private Sector Bribery

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.

The same rules and exceptions applicable to the bribery of foreign and domestic government officials are applicable to private sector bribery (as provided in section 14, above).

16. Political Contributions, Donations and Sponsorships

Coty will not, directly or indirectly use any vendor or representative, to make a contribution/payment to, or for the benefit of, any political party or candidate for public office at any level, in any country. Coty will not reimburse political contributions made by Coty employees or representatives on behalf of Coty or not. Exceptions to these rules are only acceptable if previously approved by the Executive Committee and Global Compliance Officer, after consulting with the Legal Department.

Coty might, on a case-by-case basis, donate products or make a charitable contribution or sponsor events. For the purposes of this Code of Conduct: (i) charitable contributions are any voluntary donations, in the form of cash or items of monetary value, to external parties; and (ii) sponsorships, which include any payment to a third party of money or in-kind services in exchange for which Coty receives promotional consideration, such as logo placement on printed materials; advertising placement; written or spoken acknowledgment; seats to attend a dinner and speaking engagement, or other forms of recognition.

All contributions must be transparent, and their function must be clear, plausible and documented. No contributions may be made to individuals or private accounts. No contributions may be made to organizations whose missions or objectives are incompatible with Coty business, or whose association with Coty could damage the company's reputation. All charitable donations and sponsorships should be managed and authorized by the most senior executive at the country level and local Compliance Officer.

17. Responsible Lobbying

Lobbying is an activity that involves contributing to the public policy decision-making process related to policies and regulations likely to affect Coty activities so that the public decision-maker can understand how these regulations could impact the company and its business. Coty might, upon formal written authorization from the Executive Committee and Global Compliance Officer, after consulting with the Legal Department, directly or indirectly (through associations) undertake dialogue with policy makers on topics that are relevant to the company to inform and educate the decision-makers. In any case, Coty strictly respects all relevant applicable laws, codes of conduct and standards of all entities and decision-makers and expects any third parties who act on our behalf to also respect them.

18. Intellectual Property: Patents, Copyrights & Trademarks, Sensitive, Proprietary or Confidential Information

Employees who become aware of any unauthorized use or infringement of Coty's intellectual property should immediately notify the local compliance officer, the Global Compliance Officer or the Coty Hotline. Information that Coty develops in research, production, marketing, sales, legal, finance and other areas is proprietary in nature, and its protection is essential to Coty's continued success. This confidential information and intellectual property may include, but is not limited to any formulas, method, process, trade secret, design, supplier and vendor information, pricing information, marketing and production plans, device or compilation of other proprietary information. Its loss through inadvertent or improper disclosure could be harmful to Coty and it must be protected by all Coty employees, should not be disclosed to outsiders, and access to it should be limited to those with a need to know only basis.

19. Company Confidential Information

Employees, former employees, consultants and suppliers are not authorized or entitled to use Coty's sensitive, confidential or proprietary information for their own benefit or advantage. For clarification purposes only, the purchase by you or someone you know of shares of a company based upon confidential information that you gained as a result of your work for Coty is strictly prohibited and in some countries is considered a crime – also, depending on the case, it may trigger severe disciplinary action by Coty, including termination of employment.

Coty respects your right to communicate on your own (or other employees') behalf concerning terms and conditions of employment. Nothing in this Code of Conduct is intended to interfere with your personal rights under any country's applicable laws, nor will Coty construe this policy in a way that limits such rights.

Only specifically authorized persons (for example, members of Corporate Affairs) are permitted to handle outside requests for Coty information, including but not limited to contacts with journalists and market advisors. You should consult with Corporate Affairs or Global Compliance Officer whenever there is a question concerning the disclosure of any Coty information.

The following activities are prohibited by your confidentiality obligations to Coty: (i) the unauthorized disclosure or publication of pictures of Coty products, displays, packaging and advertising; (ii) the unauthorized disclosure or publication of other creative, financial, branding, employment or other proprietary information that could be detrimental to the interests of the Coty; or (iii) posting of information concerning projects that you have worked on or pictures of products that you helped to develop that can violate rights granted to Coty in our licenses or other agreements with third parties. If you have any questions about the propriety of posting information on a website, social media or in a business solicitation, please check with your Manager, HR Business Partner, Global Compliance or Corporate Affairs.

20. Social Media Principles

Coty values and supports the use of social media by associates to drive self-expression and dynamic exchange. However, it is important to be aware of the implications of engaging with social media or any online discourse in reference or connection to Coty, its brands, and/or its products. Regardless of intent, Coty



may be affected or held responsible for its employees' behaviors online. For this reason, when engaging on social media with content related to Coty, its brands, and/or its products, all associates must comply with the company's internal policies while applying good judgment and best practices. You should also be aware that even if your social media profile and/or activity does not reference Coty, Coty products, or your association with Coty, your affiliation with Coty may be known or made known and therefore associated with your online activity.

The Social Media Policy outlines the basic principles and rules pertaining to any post made by a Coty associate that refers and/or is connected to Coty and its brand portfolio. It is intended to help avoid situations that could become difficult or embarrassing or have legal consequences for you or for Coty. Anything you post that impacts the perception of Coty, its brands and/or products is ultimately your responsibility.

Whether for personal or professional purposes, your use of social media must be aligned with the Coty Code of Conduct, the Coty Social Media Policy, and all other Coty policies relating to business conduct and applicable laws and regulations. A violation of this Policy may subject you to disciplinary action including termination of employment or other appropriate consequences.

21. Disclosures, Use & Recording of Corporate Funds

Employees who are responsible for making Coty's periodic reports and other disclosures or who come into contact with financial information concerning Coty have a duty to do so in such a manner that all entries in Coty's records give an accurate picture of the results of our operations and our financial position.

Coty discloses information to the public on a regular basis. Employees responsible for making Coty's periodic reports and other documents filed with the Securities and Exchange Commission (the "SEC"), or otherwise disclosed publicly, including all financial statements and other financial information, are responsible for preparing these disclosures in compliance with applicable securities laws and rules. Coty's SEC filings and other public communications should contain full, fair, accurate, timely and understandable disclosures.

Coty business records must be prepared accurately, conscientiously and in reasonable detail. They must reflect all transactions involving Coty and all other events that are the subject of a specific regulatory record-keeping requirement. All transactions must be executed in accordance with Coty's general or specific authorization and comply with generally accepted accounting principles.

You should not use Coty funds or assets for any unlawful purpose, and you are strictly prohibited from engaging, executing or facilitating in any money laundering activity. You are required to be vigilant and exercise good judgment in all of your activities involving Coty funds or assets, including customer transactions. You are expected to protect Coty's financial assets, such as cash, bank accounts and credit cards, guarding them against misuse, loss, fraud or theft, and only authorizing commitments, expenditures, borrowing or other financial transactions that are in line with your role. In keeping with this policy, no Coty employee or anyone acting directly or indirectly on behalf of Coty may:

- Establish or maintain an unrecorded fund or asset;
- Make false or artificial entries in the books or records; or

- Approve or make any payment with the intention or understanding that all or part of the payment will be used for a purpose other than the purpose that is described in the documents supporting the payment.

22. Responsible Tax

Coty is a responsible corporation and pays due taxes in all countries in which Coty operates. To comply with such obligations Coty strictly follows applicable tax laws and pays in full all local and national taxes - in line with Coty's tax strategy and tax planning.

23. Insider Information

Coty employees and contractors who are aware of material information regarding Coty or another public company that has not been disclosed to the public (i.e., facts which may affect the market price for that company's securities and investors' decisions to trade therein) must hold that information in strict confidence, and refrain from buying or selling, or influencing the decisions of others to buy or sell, the securities of any such company until such information has been publicly disclosed and enough time has elapsed to allow investors to react to the information. "Tipping" is also a violation of our Code of Conduct, and you may be held liable for violating insider trading laws if you tip. Tipping occurs when you provide material, non-public information about a company to anyone else, including family members or friends, who then use that information to trade in a company's securities.

24. Company Documents

All company documents must be retained and discarded in accordance with Coty's document retention policy, which is available from the Legal Department. If you have any doubt as to whether a document should be retained, you should consult with the Legal Department before destroying it. Company documents include, but are not limited to, books, files, records, memoranda, emails, letters, computer discs, tapes, and other means of electronic storage, photographs, slides, transparencies, drafts and voicemails.

25. Sustainability

Coty is committed to sustainability, which is one of our strategic priorities. This ambition is enshrined in our Beauty That Lasts Framework, which is guided and informed by international frameworks such as the United Nations Guiding Principles for Business and Human Rights, United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the Sustainable Development goals.

As such, all of our associates and workforce are expected to uphold these principles.

26. Fair Dealing & Compliance with Antitrust Laws

Each Coty employee and contractor must deal fairly with Coty's customers, suppliers, service providers, competitors, external advisers, employees and anyone else with whom he or she has contact while performing his or her job. Each Coty employee and contractor are prohibited from taking unfair advantage



of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Each Coty employee and contractor are forbidden to enter into agreements and practices in restraint of trade such as price fixing, boycotting suppliers or customers, predatory pricing intended to run a competitor out of business, unfair competition and attempts to monopolize a market. You must consult with the Legal Department prior to entering into any contacts with competitors not previously approved by the Legal Department, and also before engaging in any activities like those described above.

27. Truthful Advertising and Responsible Marketing

Coty and its employees commit to respect applicable marketing laws. Coty employees are prohibited from creating, approving, or disseminating false, misleading, or deceptive advertising and related activities in the promotion and sale of Company products. All advertising claims about our products (including those claims made in print, radio, TV, digital or which appear on product packaging) must be truthful and have a reasonable basis in fact. In the U.S., the Federal Trade Commission requires that all advertising claims be substantiated in advance of their publication, dissemination, or air date, which includes any advertisements on television networks in the U.S. and abroad.

All advertising and product claims, regardless of the medium, must be reviewed and approved by Coty's Legal Department prior to being disseminated.

28. Gathering & Maintaining Competitive Information

You must obtain competitive information legally and ethically. You must also safeguard the information provided to us by business partners, suppliers and consumers. Gathering information about our product categories is essential to protecting our market position, but you must be careful to acquire information only in a legal, ethical and respectful manner. If a co-worker, customer or business partner has competitive information that they are required to keep confidential, you must not encourage them to disclose it. Be particularly mindful of this restriction when talking to new Coty employees about their former employers.

While conducting Coty business, if you become aware of confidential information about another company that has been inadvertently disclosed, seek guidance from the local Compliance Officer or Legal Department before dealing with this information.

29. Company Assets, Safeguard of Employee Information and Information Security

During the course of your employment, you may provide sensitive personal, medical and financial information to Coty. Coty is committed to protecting this information, whether in paper or electronic format as per its Global Data Privacy Policy. You should not access co-workers' sensitive information without specific authorization and only with respect to the requirements of the applicable law and Coty Global Data Privacy Policy. If you do have access to such type of information because of the nature of your job, you must strictly follow Coty Data Privacy Policy.



As users of Coty information technology systems, you are responsible for complying with the Information Security User Conduct Policy, available from Information Security. Subject to local legal requirements, Coty reserves the right to (i) monitor emails, Internet use, discussions via messaging apps like Teams, Zoom, Skype, Coty-related social media accounts or other postings about Coty from its employees, customers and business partners posted anywhere on the Internet; and (ii) monitor use of devices, take images of communications that you have sent or received on such devices and review such communications, to promote compliance with the laws to which we are subject.

As an employee you must ensure that all Coty physical assets and property are always protected, not damaged, misused or wasted. While you are working at Coty, you are expected to take proper care of Company equipment. Upon termination, you are expected to return all property belonging to Coty in proper working order. This includes, but is not limited to, laptops, mobile phones and other devices. Continued failure to return equipment may be considered theft by Coty and may lead to criminal prosecution.

30. Compliance with Trade Restrictions

Coty is subject to a variety of laws and regulations, imposed at both the national and international levels, restricting our business dealings with certain countries, entities and individuals. Compliance with such laws and regulations is mandatory. Any questions concerning whether we are entitled to do business with any country, entity or individual, including but not limited to sanctions, should be forwarded to your local Compliance Officer, the Global Compliance or Coty Hotline.

31. Compliance with Coty's Principles for Business Partners

Coty demands that its business partners (including its contractors, consultants, vendors and suppliers) conduct themselves with the utmost fairness, honesty and responsibility in all aspects of their business. As a general principle, our business partners are required to comply fully with all legal requirements applicable to the conduct of their business. We also demand that they comply with rigorous standards with respect to the manner in which they treat their employees. We also request that all business partners accept Coty's Supplier Code of Conduct, which reflects our principles and values.
