

Provital
Do Care

Code of Ethics

2nd edition
October 2024

Presentation

This Code of Ethics reflects our culture of commitment to legality, ethics, honesty and transparency in all our relationships with our stakeholders. It contains the principles of action that all members of Provital must adhere to and promote, since the growth of our company only makes sense if it occurs within a framework of respect for these ethical principles.

Ricard Armengol
CEO



Provital

Brand manifesto

Caring is our essence and purpose.
We take care of people and nature. We take care of our customers, suppliers and stakeholders so that they can continue to grow. We take care of our workforce and their well-being. We care about preserving the environment. And because we care, we take action.



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Provital

01

Because we care, we take action

Code of Ethics, our way of being and acting

PROVITAL combines nature and science to capture the essence of the Earth in our high quality, environmentally friendly cosmetic ingredients.

Business ethics, honesty, transparency, quality, continuous improvement and professional management are the values that guide us in achieving our objectives.

In our Code of Ethics we have defined the behaviours that underpin our values. It is our highest-level regulatory instrument and is aimed at ensuring that our actions, decisions and responsibilities are always carried out in an ethically sound and consistent manner.

These principles of action and behaviour, which are set out globally in this Code of Ethics, are specified in the form of internal policies, standards and procedures that govern our day-to-day work, which are available to everyone at Provital.

Our position is one of zero tolerance for any conduct that jeopardises our values and assets. We therefore have a system of self-regulation in place, managed by our Ethics Committee, so that immediate action can be taken if these principles are compromised, ensuring that everybody's rights are protected.

Because we care, we take action

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A code of conduct for everyone

This document applies to everyone at Provital. Our conduct is a reflection of our culture and principles, so we apply the following principles in all situations:

- Ethics and legality, first and foremost. We refer to our Code of Ethics when making decisions, but always check whether a legal regulation exists in the corresponding country or region that is stricter or more specific than our Code of Ethics, in which case that regulation will prevail over our Code of Ethics. Because our priority is to do things legally and ethically wherever we are.

- For the common good. We act for the good of our company, for the people who form part of it, and for society as a whole. When making decisions, we evaluate the consequences and, based on these, we choose whatever will most benefit the community.

A code of conduct for everyone

We all have an obligation to know the laws and internal rules that apply in our area of responsibility, and each person in charge of a team must ensure that their team is familiar with the company's Code of Ethics, on which they must base their conduct.

Anyone can contact and speak openly with our Ethics Committee, to resolve any doubts or concerns, or to report a situation of conflict or non-compliance with the Code.

We expect our suppliers, distributors and customers to accept and respect the principles of our Code of Ethics. We invite them to share their own code of ethics, one that reflects ethical principles and a prevention and control policy equivalent to ours.

Thus, our Code of Ethics extends to all our stakeholders, whatever their relationship with Provital, and we will all ensure that this code of conduct is implemented and respected.



Provital

Because we care, we take action

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Sustainability: social and environmental development, and ethics and governance

Taking care is the force that moves us forward. It is also our commitment to people, communities and our planet. This is why we take action by caring, carrying out our activity with respect for the natural environment, protecting it from the environmental impact of our actions throughout our value chain.

Provital promotes sustainability, the responsible use of resources and respect for the environment. It incorporates a series of strategies, activities and practices to minimise environmental impacts on the planet and to optimise resource consumption; taking into account the social aspects of the different stakeholders and improving the ethics and sustainability of the entire supply chain.

Provital's Sustainability Policy is our active and voluntary contribution to environmental, social and ethical improvement with a commitment to making our world a better place.



We take care of our people

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Labour rights

Ethical attitude, respect, commitment to equal opportunities and the privacy and dignity of people are the principles we apply in our relationships with others, even before we start working at Provital. We are an innovative company, and for Provital equal opportunities and diversity are a competitive advantage.

In our recruitment processes, we have always guaranteed the correct treatment of personal data and your right to cancellation. We also guarantee that the principle of equal opportunities and non-discrimination is applied, and we make sure that our job offers are clear, truthful, and never confusing or misleading.

When taking up references during a selection process, we request the express consent of each person to do so, respecting their right to privacy and dignity.

Our work relationships are formalised through an employment contract, internship collaboration agreement, or similar legal document, which guarantees that our relationship is transparent and incorporates rights and obligations recognised by each country.

We guarantee the rights of our staff through any legal provision that may be applicable to them, which will never be restricted by mandatory company rules or policies.

Labour rights

To protect the rights of our employees and of society, at Provital:

- We respect and ensure respect for human rights in our relationships with third parties.
- We respect trade union freedom, the right to strike, and any other right recognised in applicable labour legislation and collective bargaining agreements.
- We apply transparency in our relationships, providing at the beginning of each employment relationship information about the job position to be filled, its functions, remuneration and benefits, as well as the Code of Ethics and the corresponding regulations which must be complied with.
- We respect the right to rest, in accordance with our Rest and Digital Disconnect Protocol.





We take care of our people

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Occupational safety

Provital bases its occupational safety criteria for all employees on the regulations regarding the prevention of occupational hazards applicable in each country. All employees and any individuals and/or entities that work with us must comply with these rules.

Our employees understand their roles, functions and responsibilities, which include carrying out their own work safely, in accordance with the occupational safety protocols for each post and person.

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We take care of our people

Right to equality

Our relationships are based on respect and equality, and everyone at Provital takes these principles as the basis for our relationships. Thus, all persons shall be respected and treated equally. With regard to gender equality, we have an Equality Plan and protocols to promote equality and prevent discrimination, focusing on the most vulnerable groups and establishing specific measures for them.

Criminal liability

Provital has a zero tolerance approach to any illegal activity. In the event of any suspicion or indication of criminal activity, therefore, all employees are obliged to report their concerns to the Ethics Committee, in accordance with the procedure detailed in our Ethical Channel Protocol.

Right to privacy

Provital only collects data and information that is strictly necessary, by means of express agreement or consent, and will always disclose the purpose and scope of use of the information provided to the company. In addition, we ensure that the channels we use to collect personal data are appropriate and comply with applicable data protection regulations.

Once the personal data or confidential information is in the possession of Provital, we ensure that it is handled confidentially and safeguarded by implementing security measures in accordance with applicable legislation.

If an anomaly is detected, either through periodic reviews or via our reporting channel, investigations will always be carried out in accordance with the principles of confidentiality, proportionality and respect for people's privacy and dignity, while fully protecting informants.

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We care for our communities

Market, competition and customers

Our relationships are based on the principle of fair competition, transparency and equal opportunities, rejecting any action aimed at gaining an advantage, or abuse of power, in our relationships with third parties and professionals.

Provital does not permit the following practices:

• Spreading unfounded rumours about a competitor's product for the sole purpose of discrediting it

• Engaging in industrial espionage, disclosing trade secrets, or any other unfair act that would put our company at an advantage

• Misusing information to which you have access, either about our company or third parties, in favour of Provital

• Disclosing privileged information that may cause losses or risks to Provital or third parties

• Falsifying or manipulating the company's economic or financial information in order to obtain a competitive advantage

Provital collaborates with the authorities and provides any information they may request in a transparent and truthful manner.



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We care for our communities

Relationship with our suppliers

Provital applies the principles of transparency, respect, loyalty, and diversity when choosing its suppliers.

We therefore expect our suppliers to adhere to our Code of Ethics or to submit their own code of ethics that complies with our principles.

To ensure compliance with the basic principles, such as fundamental respect for human rights and the protection of children from child labour, among others, Provital may request, should it consider it necessary, to visit the supplier’s facilities to carry out an ethical audit.

We care for our communities

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Conflict of interest

There may be situations that involve a conflict of interest between an employee of Provital and the company itself. This occurs when an opportunity benefits an employee or persons related to that employee, without that employee being transparent or loyal to Provital for various reasons:

Personal interest or that of close associates: hiring family members or close associates, or subcontracting the services of an acquaintance, without having passed through an objective decision-making process in which we were involved.

Personal commitments with external parties linked to our company: involvement or commercial relationship with a competitor, a supplier or a customer, without previously informing Provital, so that the case can be assessed objectively.



We care for our communities



Gifts and hospitality

Provital understands that as a result of interpersonal and business relationships we are sometimes given something, or want to express our gratitude for treatment received or show our feelings of esteem on special occasions.

At Provital we do this as part of our contribution to the UN's 17 Sustainable Development Goals, and always in accordance with our Gifts and Hospitality Policy.

It should be noted that Provital operates in diverse and complex environments. We focus on creating the policies we need to ensure our ethical values are maintained, wherever we operate in the world while adapting them to local contexts.

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We care for our communities

Corruption

At Provital we diligently abide by the anti-corruption laws that apply in each country. This is demonstrated in our actions to prevent corruption:

In our social action

we verify the real destination of our donations to NGOs, sponsorship projects or any other social, cultural or charitable project we carry out.

In our relationship with people

we report to Provital's Ethics Committee and the authorities of the country in question any suspicion of criminal or corrupt acts or those that threaten our integrity and professional ethics (e.g. racism, terrorism, or criminal organisation), ensuring that the rights of both the complainant/informant and the subject of the report are fully protected.

In our dealings with the public and private sector

we are faithful to the procedures established by the authorities or public entities, to information and the veracity thereof, and avoid any favourable treatment or influence peddling by third parties for our own benefit or that of a third party.

In the public sphere, Provital does not finance any political party. If any member of Provital is about to take up a public office, they must notify Human Resources, who can then assess the compatibility of said office with their position and functions at Provital.

In the private sphere, we ascertain the identity of our business partners in our transactions. Provital's relationships with the private sector have a commercial, research or cooperation purpose, and are supported by a service contract or collaboration agreement where the purpose is clearly stated.

Relationship with public authorities and administrations

Our relationships with public authorities and administrations are based on the principles of legality, loyalty, transparency, trust, professionalism, collaboration, reciprocity and good faith, without prejudice to legitimate disputes that, in defence of the social interest, may arise with these authorities in relation to the interpretation of the applicable regulations.

Provital respects and complies with any judicial or administrative rulings that are issued. However, the company reserves the right to appeal if it considers that the rulings are not in accordance with the law and are contrary to its interests.



We care for our communities



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We care for our communities

Taxes and other obligations

Provital will always comply with tax and social security obligations in every country in which it operates.

It will always keep true and accurate accounting records.

Provital will not make payments to nor receive payments from natural or legal persons that are not supported by true and lawful documentation.

We import and export goods legally, safely and responsibly, complying with all customs regulations: declarations, required documentation and appropriate and permitted transport in each case.

All material that comes from Provital is labelled with the information required by the applicable regulations, and our transport vehicles are not permitted to carry any goods other than those declared.

We care when we protect information

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Intellectual and industrial property

Our activity is based on the creation and innovation of tangible and intangible assets: products, projects, presentations, catalogues, policies and procedures, manuals, videos, internal training, technology, and a multitude of works and projects carried out as part of the company’s normal activity.

Provital respects its own intellectual and industrial property and that of third parties. The use, disclosure, reproduction or transformation of all or part of the company's assets (whether material or intellectual) is not permitted without prior written authorisation. We will use Provital’s intellectual and industrial property solely to carry out the company’s professional activity.

We care when we protect information

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Information security

Provital has established information security measures in order to preserve the integrity and confidentiality of the information, and we protect it through our staff on the basis of the following rules:

- Information: unauthorised access to computer systems, industrial espionage, discovery and disclosure of trade secrets, unauthorised transfer of databases, or any practice that goes against professional ethics is not permitted.

- Damage: we will avoid any practice that exposes the company or third parties to IT risk due to viruses, attacks, alteration or damage to data, and we will avoid any other harm to Provital or third parties that is spread through ICTs, such as rumours, misleading campaigns or undermining the personal privacy of individuals by searching through their profiles on social media.

In order to prevent misconduct or crime, Provital reserves the right to monitor the use of company equipment for purposes such as communications via corporate e-mail and access to external internet sites. Any information related to criminal activity will be handled by the Ethics Committee and duly investigated, and may form part of the corresponding criminal, civil or workplace disciplinary proceedings.



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Confidentiality and data protection

We protect personal data and confidential information provided by employees, customers, suppliers and other entities with whom we have a relationship, even after their employment or business relationship with the company has ended.

We obtain the written consent of our staff, who sign the Data and Information Protection Policy provided at the beginning of each employment relationship, in those countries where this applies. The Policy sets out the criteria for the use of their data during and after the employment relationship, access to the data, rights of modification and deletion, and the basic rules for the use of security tools and information for our workforce.

We protect information relating to the company and our third parties. We do not share internal information without prior written consent from the company. Nor will we transfer data of any kind provided to us by our third parties without their written consent or a prior confidentiality and data protection agreement between the parties involved.



We care when we protect information

We advise our workforce to take extra care with company property and third party information in public places, whether it be goods and computer equipment or information that they may be unintentionally displaying.

We are especially careful about the visibility of our screens, and eavesdropping on conversations on transport and in airports, restaurants and cafés.

We also take special care when sending e-mails that include sensitive internal information, by encrypting attachments and ensuring that every e-mail recipient is correct.

How we care and prevent harm

Everyone at Provital must ensure that our code of ethics is adhered to at all times and that through this system of self-regulation our rules and protocols are complied with.

We all have the obligation to inform the company of any fact that should be reported due to it entailing a legal risk, or constituting a practice or behaviour contrary to the principles set out in this Code of Ethics.

This can be done through our Ethical Channel, which you can find on our website (www.weareprovital.com), where there is an internal confidential and anonymous reporting form for sending any kind of communication or query to our Ethics Committee. It can also be done through the website of the relevant official body.



How we care and prevent harm

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Provital Ethics Committee

Its aim is to ensure adherence to the company's ethics and culture, and it is responsible for:

Disseminating
and publicising this Code of Ethics, and advising on its interpretation.

Giving recognition
to good practices where appropriate.

Receiving reports of suspected wrongdoing, omissions or malpractice, directing the investigation, and ensuring that corrective action and/or sanctions are applied as appropriate.

Intervening objectively
and respectfully in every situation, protecting the people affected and preventing reprisals.

Proposing improvements
actions and/or control mechanisms to help improve compliance.

Reporting findings
to the company's owners in a timely manner and putting them on record.

MEMBERS

The members of Provital's Ethics Committee are:

Gema Soto Navarro, Director of Finance, ICT – HR

Chair and Ethical Channel Communications Manager

David de los Santos Sánchez: Director of QHSE and Committee member

Tania Pau Brunet: HR Manager and Secretary of the Committee

How we care and prevent harm

Ethical Channel

PROVITAL has established an internal Ethical Channel for confidentially and anonymously reporting infractions, irregularities, criminal actions or omissions, and any suspicions or doubts concerning any occurrence relating to PROVITAL, its staff, executives, directors or its third parties, and for making suggestions concerning these matters.

The communication channels are as follows:

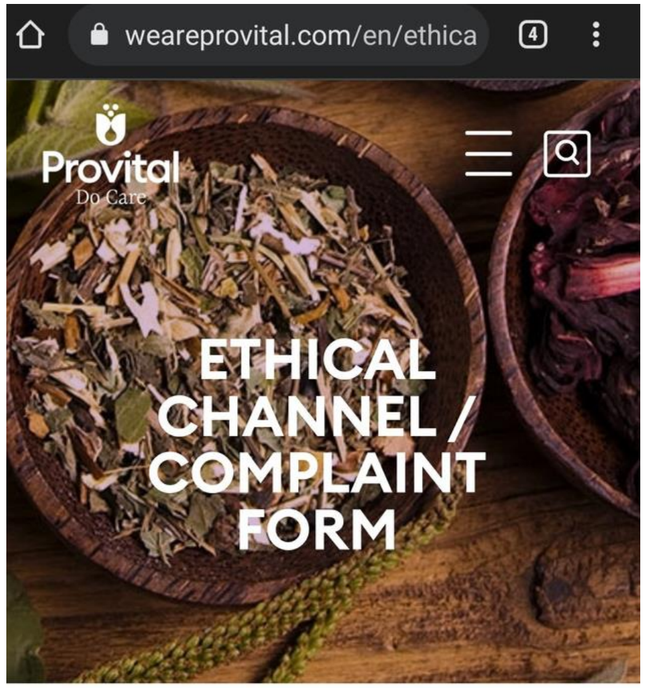
- Via **the** PROVITAL **website** https://www.weareprovital.com/en/ethical-channel
- By **e-mail** to canaletico@weareprovital.com

Or by contacting the person responsible for Communications via the Ethical Channel (Gema Soto):

- By **post**
- By means of a **personal meeting**
- **Verbally**, by telephone or voice message
- Through an external channel belonging to another relevant authority in the country

These channels are available and accessible to anyone, and of particular interest to those who have a relationship with PROVITAL, whether directly or indirectly and whether inside or outside our company. Communications received will be handled exclusively by the Ethics Committee and protected with the utmost confidentiality. When information arrives, the informant will be notified of the receipt, development and resolution of each case.

For more information, please see our Ethical Channel and Whistleblowing Protocol.



PROVITAL, in line with the values of business ethics, honesty, transparency and quality, and with the aim of strengthening the respect and trust of our collaborators, as well as our stakeholders, puts at your disposal the Ethical Channel.

The purpose of this Channel is to inform our company, in a confidential manner, of irregularity, practice or conduct contra the law, or to the principles, values and

Privacy - Terms

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Sanctioning regime

In the interest of all our workforce, the company and society, any non-compliance with the rules and its causes will be investigated and corrected.

In the event of a breach, we will assess its seriousness, study which corrective measures to apply, and then apply the corresponding sanction in accordance with the collective agreement or applicable legislation in each case.

The Human Resources Department, or its equivalent in our subsidiary, is responsible for handling the sanctioning process.

The Ethics Committee will monitor the application of the internal sanctioning process, and may establish preventive or cautionary measures, notwithstanding any other administrative or criminal sanctions that may be applicable as the result of an investigation.



How we care and prevent harm

Provital recognises that the following are equally sanctionable offences:

- Failure to report in the case of suspicion or knowledge of non-compliance
- Making a false report to harm someone else
- Harassing, discriminating against or taking reprisals against a person who has reported a case of non-compliance

Updating and improving

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Provital's Code of Ethics will be updated if any areas for improvement are identified, if we modify any part of our structure, configuration or activity that requires an update, or if there are changes in legislation that affect how we apply our ethical principles.

The Ethics Committee is responsible for proposing, approving and disclosing any changes related to this document, as well as periodically informing the company's Management of the Committee's activity.



Thank you!

If you have any queries, please e-mail canaletico@weareprovital.com

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