

Code of Ethics

BELLA AURORA
cosmética anti-manchas



Dear team:

Feeling happy, and making other people feel happy, is a key part of how we all work at Bella Aurora, and this includes the Board of Directors. We believe that feeling happy is the best way to serve and be engaged with our communities, the people who use our products, the people who help us to create them and to the people who make up our company.

We believe that people can always improve. We feel responsible for our personal development, the innovation of our products and for improving our organisation.

We believe that being honest with each other helps to build trust and that the common good is worth striving for.

We believe in going the extra mile, and in making sure of every last detail. We stick to our guns even when we encounter difficulties, we always find a silver lining and we naturally seek happy emotions and smiles.

This Code of Ethics (available on Bella Aurora's website: bella-aurora-labs.com) is intended to enhance our corporate culture of ethics and provide general guidance for our day-to-day activities and decisions.

The Code addresses important issues which are a key part of the value system, including the ethical treatment of people, customers and suppliers, and also respect for the environment.

In Bella Aurora we believe we can only be successful at our business if we apply our values, ethical behaviour and corporate responsibility. So this Code, its provisions and principles, are essential reading matter for everyone who is part of the Group. If we fail to act according to the Code, then liabilities could arise for the Company.

I would like to say a big thank you to everyone in the Bella Aurora team for their work and for their commitment to achieve the Group's business success based on strong ethics and values.

Josep Maria Martinez Ribes

CEO

Objective

The Board of Directors of BELLA AURORA LABS, S.A. ("Bella Aurora"), taking into account the current regulatory environment, has decided to create this Code of Ethics (hereinafter "the Code" or "CE") as part of its steadfast resolve to maintain and call for the highest ethical standards in carrying out our business activities.

This CE must be used as a guide and reference manual for the actions of all

personnel, suppliers, collaborators and other natural or legal persons whose work is somehow connected to the company.

Bella Aurora calls upon each and every one of its members to conform to the highest standards of integrity and honesty in each of the professional activities they carry out, complying with the laws, ethical principles and values set forth herein.

Scope

This CE is binding on all persons and collaborators of the Bella Aurora Group.

For the purposes of this Code, the Bella Aurora Group is taken to be comprised of the companies Bella Aurora Labs, S.A., Bella Aurora Research S.L. and Magna Laboratorios S.L. (hereinafter referred to directly as "Bella Aurora").

The company also calls upon everyone who has a relationship with Bella Aurora, such as customers or suppliers, to adhere and be committed to this Code of Ethics.

In particular, each person is fully responsible for observing strict compliance with this CE and all Bella Aurora officers must set an example of strict compliance and ensure that their work teams comply with it faithfully.



Our values

Trust

- ✓ I am sincere.
- ✓ I speak well of others.
- ✓ I recognise my own mistakes, without blaming others.
- ✓ I express my ideas while respecting other people's points of view.

Improve

- ✓ I seek to innovate to be better every day.
- ✓ I look for new challenges, I take the initiative and I get involved.
- ✓ I take responsibility for my personal and professional development and learning.
- ✓ When I see a way that a co-worker can improve, I tell them as soon as possible, and do so in a constructive way.
- ✓ I stay the course. I do not give up when I encounter difficulties.

Serving

- ✓ When my co-workers need help, I am ready to assist them.
- ✓ I put the group's interests before my own.
- ✓ I think about how my actions could impact my co-workers.
- ✓ I do what I say I am going to do, and I do it on time.

Doing a good job with an optimistic approach

- ✓ I play a part in the successes of the group, and I celebrate them.
- ✓ I do a good job, I look after every last detail and strive for excellence.
- ✓ I always look for a silver lining, and if I see a problem I try to come up with a solution.
- ✓ My idea when I go to work is to enjoy myself, so it's easy for me to feel good and smile.



Guidelines for conduct

REGARDING THE COMPANY

1. Enhancing the company's reputa- tion

Everyone who is a part of Bella Aurora and the companies whose work has connections to it must look after the company's good name, promote it and avoid acting against the company's interests.

REGARDING THE PEOPLE WHO WORK FOR THE COMPANY

2. Working environment

Bella Aurora employees should strive to maintain a working environment where trust, cordiality, teamwork and respect for people's dignity are the order of the day.

3. Non- discrimination and equal opportunities

Bella Aurora is committed to stamping out any form of discrimination on the grounds of race, colour, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political opinions, religion or any other personal, physical or social attribute which its employees may have, and also to encouraging equal opportunities among them.

The company will not tolerate and will punish any manifestation or conduct considered violent, abuse of authority or harassment or intimidation at work, be it physical, sexual, psychological, moral or of any other nature. Harassment or intimidation are defined as being any unwanted behaviour that has the objective or consequence of violating a person's dignity and creating an



intimidating, hostile, degrading, humiliating or offensive environment.

Bella Aurora employees will treat others with respect and dignity, wherever they may happen to be working at any given time. If they come across harassing or bullying, they shall avoid taking any part in them and shall report such behaviour.

4. *Work-life balance*

Bella Aurora undertakes to promote measures aimed at improving the work-life balance of its employees.



5. Professional development and training

Bella Aurora makes sure that its employees receive adequate training to improve their knowledge and skills, as well as their chances of promotion in the future. Training programmes promote equal opportunities and help towards achieving the company's objectives.

Everyone who works at Bella Aurora must continuously update their technical knowledge and take advantage of the training the company offers.



6. Health and safety in the workplace.

The company implements the necessary preventive measures to avoid possible occupational hazards, always observing OHS regulations in force.

Everyone who works for Bella Aurora is committed to comply with current occupational health and safety regulations in order to prevent and, where appropriate, minimise occupational hazards.



7. Privacy and intimacy

Bella Aurora respects people's privacy, in all its forms, and especially with regard to personal and private information it receives from employees as part of their working relationships with the company. This information is secret and confidential, which is why Bella Aurora is committed to preserving its integrity and confidentiality, observing prevailing data protection regulations.

The company undertakes not to disclose the personal data of its professionals, customers, suppliers or collaborators, except with the express consent of the data subjects or when the disclosure is covered by current legislation, such as in the case of judicial or government requirements. Personal data may never be processed except in cases when it is necessary to do so for legal or contractual reasons.

Employees who have access to confidential information through their work shall undertake in writing to keep this information confidential.

8. Company resources and means

Bella Aurora provides its staff with the necessary resources for them to carry out their professional duties, and undertakes to provide the necessary means to protect and safeguard those resources.

Bella Aurora employees promise to use the resources that the company makes available to them in a responsible way, in accordance with the policies established for this purpose.

Bella Aurora is the owner (or, when applicable, the licensee) of the property and of the intellectual or industrial property rights on the programmes, computer systems, equipment and other resources, and works created, developed, perfected or used by the company's employees, as part of their normal work or through the company's computer facilities.



REGARDING THE COMPANY'S MARKET

9. Confidentiality

Bella Aurora employees will ensure the integrity, confidentiality and availability of the non-public information owned by the company, or which is subject to professional secrecy, and promise not to disclose it to third parties without the prior and express consent of the company.

Bella Aurora employees must also keep any information of a confidential or sensitive nature that they may have regarding the companies or entities in which they have previously worked with, strictly confidential and secret.

They must inform the Ethics Committee of any reasonable signs of leaks of secret or confidential information, or of any private use of such information.

They must continue to honour this commitment even after the professional relationship with Bella Aurora comes to an end.

10. Relationship with customers and suppliers

Bella Aurora strives to achieve the highest standards of quality in its services and products, competing in the market based on their merits. The company will apply standards of transparency, information and protection in its relationship with customers.

The company will select suppliers and vendors objectively and impartially, avoiding conflicts of interest or bias.

Employees may only receive gifts or invitations in the cases expressly provided for in the Gifts and Hospitality Protocol.

11. Relations with competitors

Bella Aurora will compete fairly in the markets, promoting free competition for the benefit of consumers and will not behave in any way which is not permitted under prevailing competition laws.

12. Relationship with our consumers

We want our consumers to know that we always have their needs in mind when developing our products, that their safety and satisfaction is our top priority, that we interact with them truthfully and honestly, and that we are always available to answer any questions they may have.

13. *Conflicts of interest*

Conflicts of interest arise when personal interests directly or indirectly clash with Bella Aurora's interests.

All Bella Aurora employees must avoid situations that may involve a conflict between their personal interests and those of Bella Aurora. Employees must also refrain from representing Bella Aurora, taking deci-

sions or influencing decisions made, in which, directly or indirectly, there could be a personal interest for the employees themselves or for any third party with ties to the employee through any significant economic, family or professional relationship.

Bella Aurora employees affected by a conflict of interests must inform their su-

periors immediately. They must also report any situation in which they might carry out, either personally or through a third party, any professional activity that coincides with the activities carried out by Aurora,

Failure to do so will be considered to be very serious misconduct and will be punished accordingly.



ABOUT THE COMPANY'S COMMUNITY

14. Environmental protection

Bella Aurora is firmly committed to the protection and respect for the environment, and works tirelessly to minimise any negative environmental impacts, and to optimise the efficiency of resources used so as to preserve the biodiversity of the environments in which the company operates.

15. Social Environment

Bella Aurora belief in feeling happy, and making other people happy, does not just apply within the company, but is also part of our philosophy for promoting actions that have a positive impact on our social environment.

Bella Aurora strictly complies with the laws and other regulations that apply to its activity.

16. Prevention of irregular conduct or unlawful conduct

The company has internal regulations that must be observed by all its employees, collaborators, suppliers and

stakeholders. These internal regulations include various protocols that limit the giving and receiving of gifts. Gifts that are intended as bribes or to influence the recipient to take decisions that compromise their impartiality and good judgement or exceed the amounts or concepts specified in the protocols, are banned. The regulations also cover situations of conflicts of interest, commercial expenses, donations and sponsorships, and are aimed at avoiding any conduct that could be considered corrupt or which are inconsistent with the principles of good faith.

Bella Aurora adopts the appropriate compliance measures in accordance with current legislation on the subject in those operations or activities where it detects a risk of money laundering.

Bella Aurora employees pledge to comply with all internal regulations regarding the prevention of irregular or illegal conduct, and to identify and report any activity contrary to these regulations, regardless of whether they are beneficial for, or damaging to, Bella Aurora, to the Ethics Committee.

Procedures to ensure the correct application of the Code of Ethics

Bella Aurora considers that anyone who violates the values and principles of this CE or carry out illegal activities in the Group are detrimental to the entire Bella Aurora community. Accordingly, it applies disciplinary sanctions in accordance with the system of misdemeanours and sanctions contained in the Workers' Statute, the applicable Collective Bargaining Agreements and under prevailing laws. Legal action may also be taken for such breaches as may be deemed appropriate.

BELLA AURORA applies internal rules that regulate all aspects of the internal investigation procedure and possible sanctions. Meanwhile, everyone who works for Bella Aurora and who collaborates with the company has the duty to report any situation that implies or may imply a breach of the law or of the internal regulations.

Ethical channel

All Bella Aurora employees and collaborators can make use of the company's Whistleblower Channel. This is a confidential channel of communication, managed by the Ethics Committee, which aims to direct complaints from Bella Aurora employees about reasonable signs of illegal behaviour or acts which are inconsistent with this Code, always taking into account the criteria of truthfulness and proportionality.

You may write to the Whistleblower Channel using the following email address (anything you say will be kept confidential):

canaletico@bellaurora.com

Everyone must use this email address to inform the Ethics Committee of any situation that involves or may involve a breach of the CE or the regulations in force.

Complaints must always include details of the events that took place. The person about whom the allegation is being made will not be informed of the identity of the person reporting them, nor will there be any reprisals of any kind against that person.

Without prejudice to the foregoing, governmental or judicial authorities, where appropriate, may receive details of the persons making the report, to the extent that they are required by such authorities as a result of any proceedings arising from the subject matter of the report, and this will also apply to any persons involved in any subsequent investigation or judicial proceedings instituted as a result of the investigation.

Bella Aurora undertakes to process this data stringently complying with personal data protection laws, and will erase such data as soon as the investigations have been completed. Users may exercise, to the extent permitted by law, their rights of access, rectification, cancellation and opposition with respect to their personal data.

Bella Aurora Ethics Committee

The Ethics Committee of Bella Aurora, as the body responsible for the prevention and control of irregular and/or unlawful conduct, is responsible for interpreting the Code of Ethics and applying protocols that implement it and ensure its effectiveness and compliance with the law. The Criminal Prevention Manual regulates the organisation and working of the Ethics Committee.

The main tasks that the Ethics Committee of Bella Aurora must perform are:

- ✓ Overseeing ethical behaviour at Bella Aurora, **encouraging constant improvement in ethical behaviour**, and compliance with the company's corporate values.
- ✓ **To be always ready to solve any queries, doubts** and/or interpretative questions that may arise for **Bella Aurora employees and collaborators**.
- ✓ Ensuring that the criminal risk **prevention model functions properly** and that it is made known in each area and company of Bella Aurora.
- ✓ **Overseeing the implementation of and compliance with the established controls** and drawing up reporting systems.
- ✓ **Managing reports of possible breaches** and acting as a body with executive powers to propose actions to be taken when there is evidence of any alleged criminal act that may have criminal consequences for Bella Aurora.
- ✓ **Ensuring that all agreed disciplinary measures** are taken to sanction failures to observe the agreed rules.
- ✓ **Conducting regular checks** to verify the effectiveness of the model, modifying it when relevant breaches of its provisions come to light, when new legal obligations regarding crime prevention are introduced, or when they are necessary due to changes in the organisation, the control structure or the activity carried out.
- ✓ **Reporting regularly to the Board of Directors** on all activities or measures taken to prevent irregular and/or unlawful conduct.