



DR. VRANJES
— F I R E N Z E —

SUPPLIER
CODE OF CONDUCT

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Dr. Vranjes Firenze S.p.A.

Edition number	01
Date of edition	12/12/2024
Date of approval	19/12/2024

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INTRODUCTION AND AIMS

Dr. Vranjes Firenze S.p.A. (hereinafter also “**Dr. Vranjes**” or the “**Company**”) has been producing and selling fragrances to scent rooms and for personal wellbeing for more than 40 years.

The Company recognises the importance of operating responsibly during each phase of its activity, paying particular attention to supply chain practices. Aware of the crucial role played by suppliers in ensuring high quality, safety and sustainability *standards*, Dr. Vranjes is committed to establishing relationships based on integrity, transparency and mutual respect. This Code of Conduct for Suppliers (hereinafter also “**Code of Conduct**” or “**Document**”) defines a set of principles and requirements that its business partners are bound to respect, thus helping to preserve the values of ethics, responsibility and excellence that characterise the company’s activity.

This Code of Conduct aims to ensure that all of Dr. Vranjes’ business partners operate in accordance with the applicable legislation and international standards on human rights, workplace safety, environmental protection and business transparency. In addition, it aims to promote responsible practices along the entire production chain, guaranteeing that every raw material, product and service supplied, meets strict quality, sustainability and integrity criteria. Reputation and credibility are fundamental intangible resources. Unethical behaviour compromises the relationship of trust between the Company and its stakeholders. Unethical behaviour refers to behaviour that breaches legal regulations or is contrary to the provisions and principles set out in this Code of Conduct. Consequently, the Company expects suppliers to adopt a proactive approach to fulfil these requirements, contributing to the creation of an ethical business model that is respectful of the planet and people.

This Code of Conduct supplements Dr. Vranjes’ Ethical Code and is tool to support the Organisational, Management and Control Model pursuant to Leg. Dec. 231/2001.



PART I

“GENERAL PROVISIONS”

ART. 1 - RECIPIENTS AND SCOPE OF APPLICATION

This Code of Conduct applies to all suppliers of goods and/or services, consultants, distributors, partners, external contractors and third parties (hereinafter also “**Recipients**” or “**Suppliers**”) that have business dealings and relationships with Dr. Vranjes Firenze S.p.A. and with its subsidiaries, that is, *DRV UK Ltd.*, *Dr. Vranjes Japan Co. Ltd.* and *DRV US Corp.*

Recipients are bound to comply with the ethical, social and environmental principles set out in this Document and with all local and international legislation applicable to their activities.

This Code of Conduct forms an essential part of the business relationship and applies to all phases of the supply chain, from selection of the raw materials to the packaging and distribution of the products. The Company expects Suppliers to adopt equivalent *standards* with their own personnel and partners, promoting a responsible supply chain, aimed at sustainable development and in line with company values.

The Code of Conduct is based on the most relevant national and international legislation and guidelines on Corporate Social Responsibility, Corporate Governance, the Protection of Human Rights, the Protection of the Environment and Safety. The main references adopted by this Code of Conduct include the fundamental International Labour Organisation (ILO) Conventions, the United Nations Universal Declaration of Human Rights, the European Union Charter of Fundamental Rights, the UN International Convention on the Elimination of All Forms of Racial Discrimination, the UN Convention on the Rights of the Child, the OECD Guidelines, the Global Compact and the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda.



PART II

“ETHICAL PRINCIPLES”

ART. 2 - LEGALITY AND RESPONSIBILITY

Fairness, trustworthiness, honesty, transparency, responsibility and legality are fundamental principles for Dr. Vranjes. Recipients must carry out their activities in full compliance with the conduct principles set out in this Code of Conduct and all laws, rules and regulations applicable in the Countries in which they conduct their business, with particular attention to those relating to safety, health, environment and workers' rights. They must adopt high ethical standards, promoting responsible and transparent business practices throughout the production chain. Furthermore, Suppliers must ensure compliance with the specific legislation in the sector, such as that concerning the safe use of chemicals, restrictions on regulated ingredients and requirements for labelling and traceability of products.

Each Supplier is responsible for ensuring that their activities are performed with integrity, transparency and in accordance with the principles of this Code of Conduct. Failure to comply with the laws or ethical obligations may lead to the cessation of the business relationship.

ART. 3 - ANTI-CORRUPTION

Suppliers are bound to comply with the highest ethical and legal standards in the performance of their activities. In particular, they must avoid any form of corruption including, but not limited to, bribes, undue benefits and other fraudulent practices. Recipients are prohibited from unduly promising, offering, requesting or accepting money, gifts, favours, personal advantages, goods services or other benefits (unless their value is clearly symbolic) the purpose of which is corrupt or that may appear to exceed normal business practices or courtesy. Furthermore, it is forbidden to accept or offer benefits that may improperly influence decisions relating to business activities or that intend to obtain favourable treatment or undue advantages for themselves or for the Company.

Each Supplier must guarantee that their own operations comply with the applicable anti-corruption laws and that they will refrain from promoting or participating in activities that may compromise the integrity, transparency or reputation of Dr. Vranjes. Furthermore, Suppliers are required to implement internal policies and procedures to prevent corruption, for example through staff training, monitoring transactions and promptly reporting any suspicious behaviour. Dr. Vranjes reserves the right to carry out audits and checks to ascertain compliance with this legislation and to undertake appropriate action in case of breaches.



ART. 4 - CONFLICTS OF INTEREST

Recipients of this Code of Conduct must avoid any situation that may generate an actual or even a potential conflict of interest, that is, any circumstance in which personal, financial or professional interests may influence or seem to influence their capacity to fulfil their obligations and responsibilities towards the Company.

Should a Recipient have a conflict of interest, they must refrain from taking or intervening in decisions/discussions relating to the matter to which the conflict relates and declare its situation promptly.

The Company expects Recipients to maintain ethical and impartial conduct in commercial negotiations and decisions, avoiding any type of conduct that may compromise the integrity of the professional relationship or give rise to favouritism. Transparency and trustworthiness must be the basis of all interactions with Dr. Vranjes, in order to preserve mutual trust and guarantee a healthy environment of cooperation that complies with the best business practices.

ART. 5 - TRANSPARENCY

Dr. Vranjes is committed to promoting a collaboration based on mutual trust with its Suppliers, requiring that all operations and communications be characterised by maximum transparency. Suppliers are bound to provide accurate, complete and truthful information on their processes, products and services, maintaining adequate documentation to support their compliance with the provisions and standards provided for in this Code of Conduct, as well as current legislation. Furthermore, they must promptly communicate any potential critical issue that may jeopardise the integrity of the business relationship.

ART. 6 - FREE COMPETITION

Dr. Vranjes promotes and supports the principles of free competition, considering them fundamental for fair and sustainable economic development. Suppliers are required to comply strictly with antitrust regulations and not to adopt behaviour that may limit the competition on the market, such as anti-competitive arrangements, abuse of dominant position or unfair practices. Each business relationship must be marked by transparency, integrity and compliance with market rules, guaranteeing equal opportunities and fair competition among operators.



ART. 7 - PRIVACY AND CONFIDENTIALITY OF INFORMATION

Recipients are bound to obtain, store, manage and process the personal data and confidential information in their possession in accordance with the applicable legislation on personal data protection (for example, the General Data Protection Regulation - GDPR, if applicable) and to guarantee the confidentiality of the information received during the conduct of the business relationship. It is their responsibility to treat all the commercial, technical and corporate information provided by Dr. Vranjes as strictly confidential, adopting the appropriate organisational and technical measures to ensure the confidentiality, integrity and security thereof, preventing unauthorised disclosure or improper use and using it solely for legitimate purposes that are authorised within the framework of contractual relationships. Furthermore, Recipients must not use the information obtained to personal advantage or in ways that conflict with the law or are or may be detrimental to the Company's purpose or values.

ART. 8 - CORPORATE ASSETS AND INTELLECTUAL PROPERTY

Transparency, fairness and compliance with current legislation represent essential principles in the management of data and corporate assets. Dr. Vranjes requires its Suppliers to give their maximum commitment to the protection of corporate assets and intellectual property rights, using them solely for the purposes that are contractually agreed. This includes the protection of confidential information, technologies, processes, brands, patents, designs and any other form of intellectual property. Recipients are required to implement suitable measures to prevent the unauthorised disclosure or improper use thereof.



PART III

“LABOUR AND HUMAN RIGHTS”

ART. 9 - HUMAN RIGHTS AND VALUE OF THE INDIVIDUAL

Dr. Vranjes recognises and promotes the intrinsic value of each individual and is committed to guaranteeing respect for human rights and fundamental freedoms in all phases of the production chain. Recipients are required to provide a working environment that excludes any form of irregular, forced or compulsory labour or modern slavery ensuring that all workers are employed under conditions that respect their dignity.

Recipients shall refuse and abstain from any form of use of child labour, fully complying with the legislation and regulations on the minimum age of workers. Persons below the age limits provided for by the law, in accordance with local legislation or with International Labour Organisation (ILO) Convention no. 138 of 1973 regarding minimum age can not be hired to work.

It is imperative that all employment relationships are recognised as voluntary and freely agreed by the parties involved and Recipients must ensure compliance with the applicable legislation on working hours, overtime, holidays, weekly rest period and fair remuneration proportionate to the tasks carried out. Recipients are required to ensure that workers may tender their resignations in accordance with national legislation without risk of retaliation or penalty. Suppliers are prohibited from adopting practices such as withholding wages, limiting the freedom of movement of workers or confiscating personal items, passports or original identity documents. In addition, Recipients must protect freedom of association and the right to collective bargaining, promoting constructive dialogue between the parties. Suppliers also undertake to promote the development of human resources, favouring the professional and personal growth of workers through training opportunities and safe and inclusive working environments. No forms of mobbing, harassment and abuse, either physical or psychological, degrading treatment, physical disciplinary measures, intimidation or violence, shall be tolerated.

ART. 10 - IMPARTIALITY AND PRINCIPLE OF NON-DISCRIMINATION

Dr. Vranjes undertakes to promote an environment in which fairness and inclusion are key values. Therefore, the Company requires all Suppliers to respect and adhere to these principles, guaranteeing equal opportunities and fair treatment for all individuals, irrespective of gender, ethnicity, language, nationality, sexual orientation, disability, health, age, personal or religious convictions, membership of a trade union or otherwise or any other personal characteristic protected by law. Suppliers are called on to create inclusive, respectful and open working environments, where each individual feels valued and respected. Furthermore, they must implement active policies to prevent any form of discrimination and promote diversity at all levels of the organisation.



ART. 11 - OCCUPATIONAL HEALTH AND SAFETY

Dr. Vranjes undertakes to ensure that its Suppliers maintain high occupational health and safety standards, providing a working environment that protects the physical and mental wellbeing of all employees. Suppliers are bound to comply with all current legislation on health and safety, implementing preventive measures to reduce the risks of occupational accidents and illnesses. In addition, it is necessary to promote a culture of safety via ongoing training, the use of suitable equipment and the continuous monitoring of working conditions.



PART IV “ENVIRONMENT”

ART. 12 - RESPONSIBLE USE OF RESOURCES

Suppliers are bound to optimise the use of natural resources, promoting energy and water efficiency, reducing waste and adopting practices aimed at minimising the environmental impact of their activities, in full compliance with the applicable local, national and international environmental legislation. In addition, they must guarantee correct waste management, paying particular attention to the treatment, safe disposal and total generation of waste, including hazardous waste. The implementation of systems for the recycling and reuse of materials, where possible, is encouraged along with the adoption of more efficient production processes and technologies both in terms of consumption of resources and environmental impact. Every action must reflect the common commitment to the protection of natural resources and environmental protection.

ART. 13 - REDUCTION OF GREENHOUSE GAS AND POLLUTANT EMISSIONS

Suppliers are asked to monitor and manage the pollution resulting from their activities so as to minimise the emission of pollutants, favouring the use of production processes and technologies with low environmental impact. It is essential to comply with local and international legislation on environmental protection and to adopt solutions that promote the reduction of emissions of greenhouse gases, fine particles and other polluting agents.

ART. 14 - BIODIVERSITY AND NATURAL HABITATS

Dr. Vranjes undertakes to protect biodiversity and preserve natural habitats in all their operations throughout the supply chain. Suppliers are required to adopt responsible practices to reduce the environmental impact, protect local species and respect protected areas. It is fundamental that each Recipient avoids activities that may damage the ecosystems or contribute to deforestation.

ART. 15 - PROTECTION OF ANIMALS

Dr. Vranjes undertakes to guarantee that all products supplied are made respecting the life and wellbeing of animals in full, limiting the use of any ingredient or product derived therefrom. Each Supplier is bound to comply strictly with international legislation on the protection of animals, guaranteeing that their products are cruelty-free, that is, that they have not been tested on animals during any phase of their production. In addition, Suppliers must undertake to adopt responsible practices that reflect a real commitment to the abolition of animal experiments and the promotion of strict ethics in the production and distribution of their products.



PART V “CONSUMERS”

ART. 16 - CONSUMER PROTECTION

Suppliers must ensure that all products, materials and services provided are suitable and safe for their planned use, complying with the highest quality and safety standards as well as the national and international legislation in force and the relevant industrial standards. Recipients are encouraged to select carefully and guarantee the origin of the raw materials and components of the products offered and to operate in accordance with good working practices. Suppliers are responsible for ensuring that products do not present health or safety risks for consumers and that they are adequately tested before distribution.

In addition, Recipients undertake to provide Dr. Vranjes with truthful, clear, complete, accurate and up-to-date information on the product including, but not limited to, the composition, safety data sheets, instructions for use and safe disposal, where applicable, refraining from supplying a product or service other than that declared or agreed, with regard to its nature, origin, provenance, quality and quantity. Likewise, Suppliers agree to provide additional specific documents relating to the products on request, supporting Dr. Vranjes in the maintenance of consumer safety standards.

Should any defects, non-conformities or potential risks be detected, suppliers are required to inform Dr. Vranjes promptly, cooperating in the adoption of effective corrective measures and protecting the safety of end consumers. Furthermore, Dr. Vranjes reserves the right to conduct audits or checks to ensure that the production processes comply with the agreed quality and safety standards.



PART VI

“IMPLEMENTATION AND CONTROL”

ART. 17 - DISTRIBUTION, COMPLIANCE AND REVISION OF THE CODE OF CONDUCT

Dr. Vranjes undertakes to guarantee the distribution of this Document and any updates thereof, providing all information and support tools required to ensure the correct understanding and application of the provisions contained therein. In addition, a clause shall be included in all contracts entered into informing Recipients of the existence of the Supplier Code of Conduct, in order that they can read it, formally agree to it and undertake to comply with its provisions. By signing it, all Recipients undertake not to adopt behaviour that may compromise the adherence of the Company and its partners to the principles established in this Document. In order to check compliance with the Code of Conduct, Suppliers shall consent to Dr. Vranjes conducting audits, further providing all information and documents necessary and allowing Dr. Vranjes or designated third parties designated to carry out inspections at the premises of its business partners. Furthermore, Suppliers are required to adopt the necessary corrective measures to resolve any non-conformities encountered with respect to this Code of Conduct within a reasonable period. In addition, Recipients are required to ensure that, within their own supply chains, their suppliers and any other third party operating on their behalf comply with the Supplier Code of Conduct in full in all activities connected with the supply of goods or services to Dr. Vranjes. Suppliers may not delegate the activities entrusted to them by the Company to subcontractors either in full or in part without prior written authorisation. In this case, Suppliers shall remain fully liable to the Company for compliance with this Code of Conduct by subcontractors also. “Subcontractor” means any party involved by the Supplier in the performance of the activities entrusted, without having a direct relationship with the Company. This Code of Conduct, approved by the Company's Administrative Bodies, shall be subject to tracking for each update, amendment or addition. It shall be revised and updated whenever necessary to adapt its content to new legislation or relevant organisational and management changes. The Code of Conduct is published electronically on the company website to ensure that it is fully accessible to all Recipients.



ART. 18 - REPORTS AND BREACHES

Suppliers must promote and provide secure channels of communication via which its workers, partners and other parties concerned may raise concerns, make complaints and report possible illegal activities without fear of retaliation or intimidation. Reports must be treated confidentially and, where provided for by law, may be made anonymously. Dr. Vranjes has implemented a Whistleblowing system aligned with current legislation, with the intention of providing for the rigorous management of reports, protecting both whistleblowers and respondents as well as other stakeholders. Recipients are obliged to report any breach of the criteria established in this Code of Conduct, including suspected, by sending a message via the dedicated platform accessible via the following link: <https://drvranjesfirenze.integrityline.com/>.

Dr. Vranjes ensures the protection of whistleblowers against any act of retaliation or discrimination for reasons connected with their report, as well as the protection of the identity of the whistleblower and their right to confidentiality, except as obligated by law. The Company considers compliance with the rules of this Code of Conduct to be an integral and essential part of the contractual obligations of the Recipients. The Company deems conduct contrary to the principles expressed in this Code of Conduct to be a serious breach of contractual obligations and a cause for damage to the relationship of trust. Consequently, in the event of a breach, Dr. Vranjes may adopt the corrective and/or penalty measures necessary to address and solve problems encountered with respect to the Supplier, proportionate to the severity and recurrence of the breach. In the case of serious breaches, the business relationship with the Supplier may be suspended or terminated for just cause, without prejudice to any request for compensation.

