

GrupoBoticário 

Code of Conduct

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Message from the CEO

Hello!

Grupo Boticário's Code of Conduct was first published in 2009 and has undergone some updates since then, as a response to the evolution of our business.

Everyone is expected to know and act in accordance with our rules and conduct guidelines. Whenever any doubt arises or when you feel you need guidance to make any day-to-day decision, refer to the Code of Conduct. It is up to us all to disclose it to our business partners, suppliers, and everyone who has a relationship with us to avoid any doubt about the firmness of the ethical and respectful approach adopted by Grupo Boticário.

Our conduct determines how these relationships are established and maintained. It is the lighthouse that illuminates the path we take every day when we make decisions, when we commit, and when we adopt Our Way of Being and Doing.

The conduct is in our DNA, it defines it. It is in our history; it beats in our present and invites us to build the future. It is the agreement we make daily within our purpose and about how we transform the world around us.

The way we act makes the whole difference and is part of our values! As important as what we do is how we do it.

Happy reading!

Fernando Modé
CEO

Message from the **Compliance Officer**

Hello,

Over the years, our Code of Conduct has evolved, just like Grupo Boticário. The revisions and updates ensure that the document remains relevant and aligned with the best practices of governance and Compliance.

Our Code of Conduct is more than just a set of rules. It is the materialization of our values, essences, and our culture, which drive us to build an increasingly ethical and responsible future.

The success of Grupo Boticário is directly linked to how we relate to our employees, customers, suppliers, and society in general, always striving to do the right thing.

I invite you to read this Code carefully, as it is a fundamental guide for building an ethical, integral, and transparent work environment.

I count on your support to build together the best and largest beauty ecosystem for the world. This construction is the sum of each individual attitude, and the result is a company with a strong culture, where people and their relationships are the foundation that directs the beauty of growing together.

Happy reading!

Fabiana de Freitas
Compliance Officer and Vice-President of Corporate Affairs



01

Introduction

Our society is governed by several principles that guide individual and collective conduct. The same is true for companies, which establish guidelines and share them with their associates and stakeholders, suppliers, consumers, partners and society.

Based on the values of Grupo Boticário, we've developed guidelines that must be followed by all employees and stakeholders in a transparent, respectful, and coherent manner.

By following the values and standards outlined in this document, we will foster a strong and positive corporate culture that encourages integrity, respect, and responsible success.

Our purpose and essences

02

OUR CONDUCT IS DIRECTLY
CONNECTED TO OUR PURPOSE
AND ESSENCES:

PURPOSE:

To create opportunities for beauty
to transform people's lives and thus
transform the world around us.

ESSENCES:

- We make our customers' eyes shine;
- We never stand still;
- We nourish our relationships;
- We are passionate about execution;
- We seek responsible success.

*For details about each Essence,
check the information available at:
www.grupoboticario.com.br/en/our-essences-and-our-purpose*



03 Regulations

Grupo Boticário fully
complies with the Brazilian
regulations and the
regulations of all countries

04 Commitments

Grupo Boticário's management is guided by respect for human rights and the environment. This philosophy conveys the essence of Grupo Boticário and is reflected in the adhesion to global and national commitments and

Check the exhaustive list at www.grupoboticario.com.br/en/certifications

05

Who is subject to the code

This Code applies to all associates of companies of the Grupo Boticário, based in Brazil and abroad, shareholders, members of the Advisory Board and Committees, and anyone who formally commits to complying with and observing this Code of Conduct, such as suppliers and third parties.

Grupo Boticário reasonably expects that the behavior displayed by our partners, suppliers, and service providers complies with the guidelines of this Code of Conduct, whenever they are on Grupo Boticário's premises and/or carrying out business activities contracted by the group, either in-person or remotely.

¹ For the purposes of this Code, an associate is any employee, temporary employee, intern, young apprentice and statutory director of Grupo Boticário companies.

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Publication and updates

The updated and current version of the Code of Conduct is published on the Grupo Boticário Conduct Portal (conduta.grupoboticario.com.br).

The Code of Conduct is reviewed periodically, so be sure to always check the Portal to access the latest version.

07

Responsibility

Everyone is responsible for doing the right thing to nourish our relationships and keep striving for responsible success, ensuring an atmosphere of mutual respect and a healthy environment for all.

Everyone is expected to prevent or avoid any situations that could harm our stakeholders and/or the reputational aspects of Grupo Boticário, whether directly or indirectly.

Grupo Boticário's management team must set an example of compliance with the Code of Conduct and apply the guidelines of this Code daily. In addition, the management team is responsible for effectively communicating, disseminating, and demanding compliance with the Grupo Boticário's internal regulations and guidelines.



08

Open and responsible communication

Grupo Boticário strives to ensure a work environment compliant with the guidelines of the Code of Conduct. In this regard, we trust that everyone will help rapidly detect any situations contrary to the Code of Conduct so that they can be properly addressed and dealt with in the best possible way.

If you have experienced or witnessed any situation that does not comply with the Code of Conduct, you can discuss it with your Manager or BP representative in your department.

Alternatively, you can address the issue directly through the Code of Conduct management process, reporting the situation to the Conduct Channel.

The Conduct Channel is available 24 hours a day, 7 days a week, on the website or by phone.



conduta.grupoboticario.com.br



0800 706 2000

09

Non-retaliation

Everyone shall commit to ensuring a work environment where everyone is free to resolve doubts and express concerns and opinions on non-compliance in a broad way. Retaliation of any kind will not be tolerated.

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Cooperation and confidentiality

You are responsible for ensuring confidentiality as outlined in this Code and for cooperating in managing Conduct issues through the relevant channels.



General guidelines

11.1.

RELATIONSHIP WITH EMPLOYEES

“We nourish our relationships” and **“We seek responsible success”** are two of the five essences of Grupo Boticário. For us, as important as the result is the way it is achieved. Therefore, we take into account not only our businesses but also what is relevant to society, our employees, customers, business partners, and suppliers.

We believe that the professional environment must be ethical and inspire responsibility, commitment, and trust, but it also needs to be relaxed, healthy, safe, and enjoyable. Relationships among employees must be supportive, based on respect and equal rights. It is everyone's duty to nurture this environment, with the leaders setting the example.

11.1.1.

HUMAN RIGHTS
AT WORK

Grupo Boticário understands that to be both productive and engaging, the work environment must also nurture a respectful relationship between people. Therefore, it encourages respect for individual freedoms, different personal traits, and fair treatment of its employees and partners. Human rights must be respected under all circumstances.

Grupo Boticário believes in the beauty of relationships, values and respects diversity, repudiates and fights any type of discrimination.

Grupo Boticário repudiates child labor and forced or slave-like labor, and reaffirms its commitment to best labor practices, respecting Human Rights and complying with the Consolidation of Labor Laws (CLT).

11.1.2.

INTERNAL
RELATIONSHIP

Employees are encouraged to innovate and nourish relationships through respectful and transparent interactions. After all, transparent and straightforward conversations lead to optimal results and foster both professional and personal growth.

In the interaction between the teams, everyone is advised to encourage professional development, striving for excellence in all activities, with well-defined goals.

11.1.3.

HARASSMENT AND
DISCRIMINATION

“We nourish our relationships” is one of the essences of Grupo Boticário. Abusive behavior that might be interpreted as bullying, sexual harassment or misconduct, or any abuse of power will not be tolerated.

Everyone must be treated with respect and dignity. Physical or verbal behaviors that might humiliate others; discriminatory actions that could interfere with functional performance or create an intimidating, abusive, hostile, and offensive work environment will not be accepted.



Threatening, embarrassing, or offending a fellow associate, whether a colleague, subordinate, or line manager.



Encouraging healthy working relationships, embracing differences, treating everyone with respect and politeness.

Grupo Boticário respects, encourages, and cherishes the diversity of all individuals, regardless of any personal trait, whether based on race, ethnicity, religion, gender identity, sexual orientation, nationality, citizenship, origin, marital status, social or economic status, physical or mental disability, age, or other personal characteristic, embracing every difference.

TIP

Situations contrary to the guidelines of this Code must be addressed with your leader. You can also reach out to the HR officer in your area, and alternatively, you can report the situation to the Conduct Channel.

11.1.4.

PROTECTION AND
USE OF GRUPO
BOTICÁRIO’S ASSETS

Grupo Boticário invests in proper infrastructure, whether furniture or equipment. These assets must be used only for professional purposes on behalf of Grupo Boticário in accordance with the applicable licenses, terms and conditions. The technological tools installed on the computer are for professional use and subject to monitoring.

Please use the assets of Grupo Boticário as if they were yours. In addition to the responsibility of each employee, leaders play a crucial role in guiding their teams towards this direction.

It is everyone’s responsibility to ensure the careful use of Grupo Boticário’s assets, ensuring they will not be impaired or misused. These assets include financial assets, vehicles, office supplies, equipment, computers, networks, software, telephone, and Internet services.



11.1.5.

MARKETING PRODUCTS
AT GRUPO BOTICÁRIO’S
PREMISES

The occasional sale of products and services on Grupo Boticário’s premises or remotely is allowed provided it does not affect the business performance; the products are not irregularly sourced and/or do not overstep Grupo Boticário’s business, interests, and industries, whether directly or indirectly.

11.1.6.

BEHAVIOR AND
DRESS CODE

Grupo Boticário values the plurality of styles and understands clothes and accessories as statements of preferences and personalities.

In areas and activities where uniforms or specific clothing are mandatory, they must be used according to internal guidelines and applicable safety standards.

Employees are expected to wear clothing appropriate to the environment in which they work, whether it be corporate offices, factories, distribution centers, or other settings. This means respecting each person’s individual style.

11.1.7.

WORK HEALTH AND SAFETY

The health, quality of life and safety of all employees and partners are vital to Grupo Boticário. Therefore, it is everyone’s obligation to comply with all security processes and procedures. We kindly request everyone to be mindful of uniforms and personal safety equipment (PPE) required to perform any daily activities. As an additional precaution, all associates are expected to report to their leader any situation that might threaten the physical integrity of people within Grupo Boticário’s premises.

USE OF ALCOHOL, DRUGS, FIREARM CARRY AND VIOLENCE AT WORK:

Grupo Boticário encourages the physical, emotional, intellectual and social balance of its associates and encourages them to adopt and maintain healthy habits for the well-being and safety of everyone.



ALCOHOL

It is prohibited to work within Grupo Boticário under the influence of alcohol. Consuming or carrying alcohol at Grupo Boticário premises is only allowed during celebrations, as authorized by the Director in charge, always in moderation and in a way that does not harm the professional performance or influence any type of behavior that might infringe the guidelines of this Code. However, if the employee plans to drive, they should not consume alcoholic beverages, in accordance with the applicable legislation.



DRUGS

It is forbidden to consume, possess, enter, and/or remain on the premises or while carrying activities on behalf of Grupo Boticário under the influence of any type of illicit drug.



FIREARM CARRY

It is forbidden to carry or keep any type of weapon on premises or while carrying out activities on behalf of Grupo Boticário. Service providers that might carry weapons as a work tool must be duly authorized, identified and qualified to do so.



VIOLENCE

Any type of violence, whether physical, psychological, sexual, financial, moral or any other, against any person is prohibited.

11.1.8.

AFFECTIVE RELATIONSHIPS AND RELATIONSHIP BETWEEN EMPLOYEES

In the work environment, professional relationships can coexist with personal relationships. However, intimate and private issues should not interfere with professional relationships, whatever they may be, including discussions or public displays of affection. Grupo Boticário is not against personal or family relationships between employees, as long as there is no direct reporting relationship or conflicts of interest pursuant to the terms of this Code and the internal guidelines of Grupo Boticário.

Please share with your leader and HR officer if you have any personal involvement or kinship relationship with any employee because trust is strengthened by transparency, and you can avoid situations of potential conflict of interest.

11.1.9.

CONFLICTS OF INTEREST

A conflict of interest, whether real or perceived, occurs when personal interests, the position of the employee (i) might directly or indirectly serve private interests that are contrary to the interests of Grupo Boticário, or (ii) may cause damages or losses to Grupo Boticário.

Employees shall not use their relationship with Grupo Boticário to obtain undue advantages for themselves or unduly favor other businesses/people. They must avoid even perceived conflicts of interest that could raise doubts about their sense of integrity.

A conflict of interest may arise, for example, when an employee negotiates with family members or close friends. The same applies if an employee has relatives or friends who work for suppliers or even if they are involved in a process that will select suppliers and/or employees with whom they maintain a personal relationship.

In addition, employees shall not carry out external activities, whether directly or indirectly, paid or unpaid, that (i) involve information or knowledge of Grupo Boticário that should not be disclosed, (ii) conflict with Grupo Boticário's business interests or (iii) jeopardize their activities and performance within the Group; or (iv) relate to the Group's operations.

Inform the Conduct Channel of any situations where you seem to be involved in a conflict of interest before it occurs.

If you have any doubts, email conduta@grupoboticario.com.br and you will be guided on how to proceed.



11.1.10.

INTELLECTUAL PROPERTY

Intellectual property is one of our most valuable assets.

Therefore, all brands, innovations, patents, improvements, processes or products, designs or models, techniques, trade secrets, logos, designs, diagrams, financial, commercial or market information, ideas, know-how, formulations, business processes, research or any other non-material activity developed for Grupo Boticário, whether by its employees or procured third parties, are the exclusive property of Grupo Boticário and must be protected.

11.1.11.

ETIQUETTE
FOR THE MEDIA
AND PUBLIC
PRESENTATIONS

Grupo Boticário and its brands have relevant media coverage that happens spontaneously and is free from any exchange of favors. To ensure accurate, understandable, and coherent communication, every relationship with the media is handled by the Executive Office of Communication & Branding—which is responsible for defining and/or authorizing disclosures in line with Grupo Boticário’s communication strategy.

Do not provide information about Grupo Boticário if contacted by journalists or media professionals. No employee is authorized to disclose information without prior authorization from the Communication and Reputation areas of Grupo Boticário.

If you are invited to participate in events and lectures (both in person or remotely), provide information for academic papers, or write articles about Grupo Boticário, it is important to previously inform your Senior Manager so that you can define together what can be disclosed without violating any confidentiality criteria or cause damage. It is crucial to report on the invitation to the Vice Presidency of Institutional Affairs and Communication to ensure the best exposure for the company. The Executive Office of Communication & Reputation will offer all necessary guidance and provide information that can be useful to the work or lecture while not harming Grupo Boticário.



11.1.12.

USE OF
TECHNOLOGICAL
TOOLS

It is expressly forbidden to use corporate equipment (computers, cell phones, etc.) and tools (e-mail, drivers, applications, etc.), in violation of the Information Security Policy.

Technological tools must always be used within the limits of the law, in good faith, and shall not infringe the values and internal guidelines of Grupo Boticário.

11.1.13.

CONFIDENTIAL
INFORMATION
AND SOCIAL
INTERACTIONS

In some work routines, employees will often have access to information deemed confidential concerning Grupo Boticário’s business strategies, for example: product formulations and operating methods, personal data, significant changes in the group, data about employees and suppliers, business models, etc.

According to the Information Security Policy and the Privacy Policy, this information must remain confidential and cannot be disclosed under any circumstances or used to obtain any kind of undue advantage or personal favor, even if the employee ends their employment with Grupo Boticário.

Any information concerning Grupo Boticário that could expose information to competitors, infringe on the privacy of employees, franchisees, partners, and customers, or could in any way harm Grupo Boticário must be treated as confidential.

To ensure the security of such information,
Grupo Boticário recommends special precautions:

1 IN PUBLIC PLACES:

When talking on the phone or participating in a video call, respect the confidentiality of the information and try to keep a low tone of voice, after all, you are representing the interests of Grupo Boticário.

- In restaurants, classrooms, transportation services, and events, take extra caution with your words. We advise you to talk about business only when necessary and always adopt a neutral and low-profile approach.
- Airports also require special care, since they are crowded places with many people traveling on business. Using computers in airport lobbies and on board of aircrafts requires particular attention to prevent theft and exposure of strategic/confidential information.

2 AT GRUPO BOTICÁRIO OR IN A REMOTE ENVIRONMENT:

You are responsible for your own password. Grupo Boticário does not allow the sharing of passwords and considers the owner of the password fully responsible for safely keeping and using it, in accordance with the Information Security Policy. .

- You need to be vigilant about the handling of confidential documents, e-mails, and other communication tools, not leaving them on the table or open on the computer screen and making sure that they reach the recipient only.
- Passwords and other access codes to internal systems are individual and non-transferable.
- Employees who work with confidential information in printed materials must keep it in a locked drawer when they are away from their desks.
- Employees who are approached directly to talk with consultancies about how they perceive the industry and competitors are advised not to participate in this type of conversation. This is justified on the grounds of data and information protection regarding Grupo Boticário's business.
- Any and all events that might jeopardize information security must be previously reported to the Information Security area, which is responsible for assessing the Information Security Policy.

3 THE INTERNET AND SOCIAL MEDIA:

- Grupo Boticário encourages the ethical, safe and legal use of new communication and interaction technologies, including social media such as Instagram, Facebook, X, LinkedIn, TikTok, among others, and internal channels such as Slack. As per the Corporate Information Classification and Sharing Procedure, employees are not authorized to disclose images, videos, comments, publications, data, and information in virtual communities, discussion forums, and/or on their social media accounts.

Here are some examples of what should not be shared: Pictures of the interiors of factories, distribution centers, laboratories, computers displaying spreadsheets and/or active systems, products under development, internal presentation slides, and more.

- Furthermore, Grupo Boticário repudiates the use of social media by employees and associated individuals to offend, harass, discriminate, retaliate, or to carry out any actions that might be illegal, unethical or contrary to the conduct guidelines suggested herein.

4 PERSONAL DATA:

- Grupo Boticário undertakes to comply with any regulation that protects the privacy and personal data of all stakeholders with whom we interact: employees, consumers, resellers, suppliers, partners, among others.
- All parties involved in the use and management of this data must behave ethically, transparently, and carefully, observing the intended purpose and the need for processing.

If you have any doubt, refer to the Information Security Policy, the Privacy and Personal Data Protection Policy, and the Internal Regulations for Privacy and Personal Data Protection Regulations (RIPP), which must be fully complied with.

11.1.14.

ACCOUNTING
INFORMATION

Grupo Boticário’s accounting information meets all legal requirements and best market practices, including the hiring of reputable external auditors to ensure the reliability of internal controls.

All publicly available information can be found on the Grupo Boticário website and institutional materials.

Grupo Boticário usually discloses any material facts to the internal public before releasing them to the market. This practice reinforces transparency in our relationship with our associates.

11.1.15.

LARCENY

Grupo Boticário does not tolerate the theft of its assets or the assets of any person. In campaigns, events, demonstrations, and similar events, items that make up the scenario cannot be carried off. The same applies to products under development or testing phase.

11.1.16.

GIFTS,
INVITATIONS
AND
HOSPITALITY

Gifts, invitations and hospitalities offered to Grupo Boticário employees require extra care, as they may imply potential favoring, to the detriment of Grupo Boticário’s interests.

It is everyone’s responsibility to understand restrictions when giving and receiving gifts, invitations and hospitality and to comply with all guidelines and approvals laid down herein.

1 GIFTS

Receipt

- Grupo Boticário does not prohibit its employees from receiving gifts, as well as gift cards/vouchers, provided that this is an occasional situation, and the gift has a market value of R\$ 500.00 (five hundred reais) or less. It should be noted that the value is a guideline only, as the gift cannot be accepted in case of a conflict of interest or if it is intended to encourage a certain action by the recipient.
- If the market value of the gift exceeds that established by Grupo Boticário or characterizes a conflict of interest, it must be refused by the employee. If the employee finds themselves unable to refuse it, either for cultural reasons or because of the return logistics, refer to the Conduct area via email, to **conduta@grupoboticario.com.br** which will advise on how to proceed.
- Receiving any monetary gift is prohibited.

Offering:

- Gifts and presents offered by Grupo Boticário and its employees to their network of partners must also have a market value of R\$ 500.00 (five hundred reais) or less.



- In the case of public officials, the offer of gifts, presents, and hospitality should be avoided. On an exception basis, the employee must first consult the Compliance team.

It is forbidden to give any gifts, invitations and hospitality to public agents without first consulting and obtaining approval from the Compliance team: compliance@grupoboticario.com.br

2 INVITATIONS AND HOSPITALITIES:

Receiving hospitality, invitations to events, courses, and similar offers may occur occasionally in accordance with high ethical and integrity standards.

Invitations to speak and attend events may be accepted provided that air tickets and accommodation are not paid for. Invitations must only be accepted with the consent of the immediate superior and the Executive Office of Reputation and Institutional Relations, who will choose who will represent Grupo Boticário.

Invitations for meals can be accepted provided that they are occasional and occur in a business context relevant to the company, and all people involved must be directly connected with the subject. In addition, a colleague or leader should preferably accompany the invited employee.

General guidelines to gifts, invitations and hospitalities:

Employees should not accept frequently any kind of gift, invitation, or hospitality that could appear to offer undue advantages, nor should such gestures be linked, for instance, to obtaining improper personal gains, rewards for a business deal, or exchanges of favors or benefits, whether implicitly or explicitly.

Employees should always talk to their Senior Managers about any offers received, who will authorize or de-authorize the acceptance, after assessing the general conditions of the offer. If you have any doubts, you can refer to the Conduct team (conduta@grupoboticario.com.br).

It is important that suppliers and business partners understand the limits for receiving gifts from Grupo Boticário, and the leaders of each area should inform and emphasize such parameters to their teams.

Every employee who receives a gift or hospitality, even within the parameters established herein, must report the receipt to the Conduct Channel².

² Gifts of no financial value do not need to be reported.
Examples: pencils, notebooks, calendars, key rings.

11.1.17.

SALE OF PRODUCTS BY EMPLOYEES

Employees are strictly prohibited from reselling Grupo Boticário products for profit, regardless of whether the products were purchased through the Association or the company's official websites.



11.1.18.

POLITICAL
AFFILIATION IN
CLASS ENTITIES

Grupo Boticário does not make financial contributions or donations to political parties. Donations/contributions to political parties on behalf of the company are prohibited.

Conversely, Grupo Boticário acknowledges that every Brazilian citizen has the right to run for political office and any employee who makes such a decision, as long as the candidacy does not interfere with their professional responsibilities.

Grupo Boticário values political plurality and believes that political debates are beneficial as they promote democracy and a variety of ideas. Grupo Boticário also recognizes that party membership is an individual choice and, therefore, maintains a neutral approach in periods of political election and encourages the same impartiality among employees in the work environment. Therefore, distributing political materials on Grupo Boticário's premises is not allowed.

If the employee holds positions or is engaged in any external political entities that have no connection with their activities at Grupo Boticário, the employee must report in writing to their Senior Manager as well as to the Compliance team (compliance@grupoboticario.com.br), so they can assess if there are any conflicts of interest or overlapping with the working hours at Grupo Boticário.

The participation of employees as representatives of Grupo Boticário in Managing Committees of Trade Associations that have representation in the market in which Grupo Boticário operates must comply with the guidelines established in the Institutional Affairs and Communication Policy and be designated by the Vice president of Corporate Affairs.



11.2.

OUR WAY OF
DOING BUSINESS

Grupo Boticário is acknowledged for the integrity with which it conducts its business and aims to develop, together with its stakeholders (suppliers, service providers, franchisees, resellers, employees, etc.), a more ethical, inclusive, and transparent market.

We repudiate any act of money laundering, financing of terrorism, and proliferation of weapons of mass destruction (PLD/FTP) or any criminal activities involving financial resources, including those involving simulation or concealment of such resources, and we understand that it is our responsibility as a company and towards society to prevent our operations and businesses from being illegally used for these practices. For this reason, we carry out every procedure and control required to comply with the applicable regulations and regulators.

In addition, Grupo Boticário recognizes the role of doing the right thing through each employee and requires them to act responsibly while doing their business on behalf of the group. The engagement of each employee is a condition for the success of the business, and the conduct adopted at work must exclude any act that might imply disregard for the interests of Grupo Boticário. Everyone should always strive to correctly and accurately follow procedures, taking into consideration every note and information provided in the work context. Leaders are required to treat their subordinates equally and fairly, encouraging their development and sharing ideas, as well as to take responsibility for results achieved under their leadership.

We understand that following these guidelines, we will never stand still and will be passionate about execution, seeking responsible success, without losing our integrity, which has always been Grupo Boticário's way of doing business.

11.2.1.

US AND OUR BUSINESS PARTNERS

Grupo Boticário's products are distributed to consumers through various sales channels and reach every region of Brazil, as well as many other countries. "Nurturing our relationships" is one of our Essences and, within the Grupo Boticário, relationships with our partners transcend the simple concept of commercial relations and are built on clear and mutual expectations. These relationships are grounded in respect and professionalism, with a solid commitment to diversity and inclusion.

There are cases where potential business partners may send samples of their products or services for analysis for areas interested in procuring them. Such situations must be handled with the utmost transparency, as they might be understood as a conflict of interest. Each case should be carefully reviewed in consultation with the responsible Director.



11.2.2.

US AND OUR CUSTOMERS

We make our customers' eyes shine and strive to satisfy, captivate, and earn the preference of our consumers.

Grupo Boticário's investments, combined with the passion of its employees, allow us to create and manufacture innovative and high-quality products, focused on transforming the world around us through beauty. Grupo Boticário makes every effort to deliver products and services that exceed consumer expectations. All this is combined with our relentless pursuit of providing unique experiences in every contact we make through beauty.

11.2.3.

US AND OUR SUPPLIERS

To put plans into action and achieve results, Grupo Boticário works closely with several suppliers. The selection process of these partners is very strict, without any type of favoritism, and seeks the best cost-effective solution for Grupo Boticário, its customers and consumers.

Any type of negotiation to hire any professional from companies with which Grupo Boticário has commercial connections must take place through a dialogue based on respect and professionalism.

11.2.4.

US AND TRADE ENTITIES

Grupo Boticário respects the freedom of association, recognizes relevant trade entities as legal representatives of employees, and seeks to maintain a constant dialogue on labor and unionist issues.

11.2.5.

US AND GOVERNMENT AUTHORITIES

Grupo Boticário regularly engages with various levels of Public Authorities through constructive, ethical, and transparent dialogue, ensuring that all actions align with the guiding principles of this relationship.

Relationships with public authorities must be based on respect, seriousness, and morality in order to foster a righteous relationship, in compliance with the applicable legislation. Interactions with public authorities must always align with Grupo Boticário’s values and essence, reflecting our commitment to doing the right thing.

During inspections of any kind, employees responsible for liaising with authorities are instructed to act strictly in accordance with the law, avoiding any actions or encouragement that could hinder the proper conduct of the inspection process. Our dedication to this principle is evident in our firm ethical stance, which strictly prohibits offering any undue advantage or privilege to public officials—particularly those that could suggest improper favoritism, as outlined in item 11.1.16 of this Code.

The fight against corruption is everyone’s responsibility, and offering or granting undue advantages to public authorities, seeking personal gains or gains to Grupo Boticário, as well as the financing of illicit acts, are illegal and unjustifiable conduct, not allowed in Grupo Boticário, regardless of the context.

Pursuant to Law 12.846, dated August 1, 2013, the following are considered wrongful acts: (a) to promise, offer or give, directly or indirectly, an undue advantage to a public official or to a third party related to him/her; (b) to demonstrably finance, defray, sponsor or in any way subsidize the performance of the wrongful acts established in this Law; (c) to demonstrably make use of a third party, either an individual or a legal entity, in order to conceal or dissimulate the entities’ actual interests or the identity of those who benefited from the performed acts; or (d) to hinder investigations or inspections carried out by public agencies, entities or officials, or to interfere with their work, including the activities performed by regulatory agencies and by inspection bodies of the national financial system.

Any sign that might indicate a risk of corruption or bribery must be reported to the Compliance team (compliance@grupoboticario.com.br) or to the Conduct Channel.

For further guidance on the subject, refer to the Anti-Corruption Policy available on Grupo Boticário’s Google Sites³.

³ Please visit: <https://sites.google.com/grupoboticario.com.br/politicaseprocedimentos>

11.2.6.

US AND OUR COMPETITION

Grupo Boticário respects other companies operating in the cosmetics and beauty industry and promotes a healthy competition, without the aid of espionage or other practices that do not constitute fair or legal methods.

11.2.7.

US AND SOCIETY

Our relationship with society is more than the products and services available in our stores. Our purpose is to create opportunities for beauty to transform people’s lives and thus transform the world around us.

To achieve this, Grupo Boticário undertakes its own initiatives, supports projects, fosters partnerships, and organizes institutional visit programs to strengthen relationships with diverse audiences and promote social development. These efforts aim to help reduce social inequality across the broader population.

Recognizing its responsibility and influence on society, Grupo Boticário publicly commits to future goals in the areas of ESG—Environmental, Social, and Governance. Reflecting on its history, it is clear that Grupo Boticário has consistently prioritized sustainability, nature conservation, and respect for people, all supported by a robust governance structure. Care and respect are in Grupo Boticário’s DNA, and these issues have always been part of our mission and operation, respecting environmental, social, and administrative regulations.

To find out more about Grupo Boticário’s future commitments, visit the information available on the website: www.grupoboticario.com.br/en/beauty-for-the-future

11.2.8.

US AND THE ENVIRONMENT

The beauty that Grupo Boticário expresses is also evident in its interaction with the environment, contributing to a more beautiful and sustainable world. Grupo Boticário supports environmental conservation with practices that are not only limited to compliance with environmental laws. Grupo Boticário fosters a culture of respect for nature that we share with our employees, consumers, business partners, and suppliers.



Credit: Fundação Grupo Boticário Collection

The Foundation’s efforts inspire Grupo Boticário, its partners, and employees to adopt responsible practices that protect natural heritage.

For more information about the Foundation, visit www.fundacaogrupoboticario.org.br

At Grupo Boticário’s facilities, all activities are periodically monitored in order to use resources efficiently and reduce or eliminate waste, and mitigate environmental impacts. Grupo Boticário does not test its products on animals and conducts several other initiatives to integrate sustainability into its business strategy.

Since 1990, inspired by its founder Miguel Krigsner, Grupo Boticário has supported the Grupo Boticário Foundation for Nature Protection through its Private Social Investment (ISP) initiatives. This non-profit organization is dedicated to conserving Brazil’s biodiversity. Guided by a commitment to society and global

environmental goals, the Foundation advocates protected nature as a solution to contemporary challenges, serving as the foundation for social well-being and a strong economy.

Through the Fundação Grupo Boticário, the Group brings nature conservation to life across Brazil by supporting and developing initiatives to protect wildlife, flora, and critical ecosystems. This includes safeguarding essential resources like water, natural areas, and oceans. Additionally, the Foundation manages two Private Natural Heritage Reserves (RPPNs) in the Atlantic Forest and Cerrado—Brazil’s most endangered biomes.



Managing the code of conduct

Grupo Boticário acknowledges the role of Compliance for its business. Good integrity practices have always been an internal reality.

To further reinforce this position, in 2015 Grupo Boticário set up a Compliance division, responsible for implementing a Compliance Program based on three pillars: prevention, detection and response. This program has the backing of senior management and enhances its corporate governance strategy. The Compliance Officer is appointed with authority, independence, and management

autonomy, a role currently held by the Vice President of Corporate Affairs. The conduct management process plays a vital role within the Compliance Program. Ongoing communication and education efforts serve to prevent misconduct. The Conduct Channel plays a crucial role by enabling the identification of situations that violate this Code, and once misconduct is confirmed, appropriate measures are implemented.

Appropriate measures in response to non-compliance with the Code of Conduct can range from training sessions to termination. These measures are implemented as per the legislation once the report’s analysis is concluded and the misconduct is verified. It is also possible that the escalation is a mere orientation or correction of a certain process or educational action.

Grupo Boticário has also several corporate policies that contain guidelines to be followed by employees. Such documents are available on the Google Sites⁴ of Grupo Boticário and not complying with them can also be viewed as non-compliance.

Whenever any cases of non-compliance with this Code and the applicable legislation are identified, you are advised to report them to the Conduct Channel so that they be handled accordingly.

Confidentiality and impartiality are requirements of the conduct management process, whereas all parties involved in the reports are fully respected.

Escalations and measures shall be decided by the Conduct team and the Conduct Committee, chaired by the Compliance Officer, who reports to the Risk and Audit Committee.

The Conduct Channel is an independent channel, which ensures the confidentiality, preservation of the identity of the complainant and the escalation of the claims received via the following channels:



Conduct Portal - [conduta.grupoboticario.com.br](https://sites.google.com/grupoboticario.com.br/politicaseprocedimentos)
0800 706 2000 (service via answering machine or outsourced telephone answering service)

The Conduct Channel is available to receive reports 24/7. Furthermore, reports are made in a secure environment and can be submitted either identified or anonymously. A dedicated and external structure allows us to receive all claims.



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Term of commitment with **Grupo Boticário's code of conduct**

This Code is a guidance document with which each employee undertakes to comply and is an integral part of the Employment Agreement. Sign the term below and deliver it following the instructions provided as a recognition and commitment to our way of being and our way of acting.

TERM OF COMMITMENT WITH GRUPO BOTICÁRIO'S CODE OF CONDUCT

I warrant and represent, under the terms of Grupo Boticário's Code of Conduct, that I hereby acknowledge the main guidelines and principles of the Code of Conduct established by Grupo Boticário, and I am aware of the importance of fully applying the rules contained therein. My acceptance of this term is a manifestation of my free acknowledgment.

Name: _____

Registration No.: _____

Company: _____

Place and date: _____

Signature: _____

