

CODE OF ETHICS

(relating to the Organizational, Management and Control Model pursuant to Legislative Decree 8
June 2001 No. 231)

adopted by HOLIDAY DEPILATORI S.R.L.

Rev. 01/2025

1. INTRODUCTION

Holiday Depilatori S.r.l.'s mission is to produce cosmetic products that contribute to people's care and quality of life. To this end, Holiday Depilatori S.r.l. intends to ensure compliance with high ethical standards in the day-to-day conduct of its work. These ethical standards, and the guiding principles behind them, are summarized in this Code of Ethics, which formalizes practices already in place at Holiday Depilatori S.r.l.

Introduction to Legislative Decree No. 231/2001

Legislative Decree No. 231 of June 8, 2001 (hereinafter the “Decree”) provides for the “Regulation of the administrative liability of legal entities, companies and associations, including those without legal personality.” Through this Decree, the Italian legislator introduced into the legal system the principle of corporate liability for crimes committed – in their interest or to their benefit – by employees and/or the other persons indicated in Article 5 of the Decree (e.g., Directors, Statutory Auditors, Managers, Representatives of the Entity, as well as persons under their direction or supervision), unless, among other conditions, the Entity has effectively adopted and implemented an appropriate organization, management and control model (hereinafter the “Model”).

In the context of adopting an Organization, Management and Control Model pursuant to Legislative Decree 231/2001, Holiday Depilatori S.r.l. has therefore adopted an “Ethical Code of Conduct” (hereinafter also simply referred to as the “Code of Ethics” or “Code”) with the purpose of providing general ethical and behavioral guidelines to employees, shareholders, collaborators and other stakeholders, which they must adhere to in the performance of their activities, as well as to help prevent the commission of the offenses covered by Legislative Decree No. 231/2001.

The Code of Ethics does not replace or overlap with laws and other external and internal regulatory sources; on the contrary, it supplements and strengthens the principles contained in those sources, with particular regard to the ethical profile of business conduct. The Code of Ethics is therefore in line with the principles set out in the Confindustria Guidelines in their most up-to-date version, with domestic and international regulations, as well as with the UN Global Compact of July 26, 2000. Holiday Depilatori S.r.l. (hereinafter also simply referred to as the “Company”) believes in the value of work and considers legality, transparency and fairness in conduct as essential prerequisites for achieving its economic, productive and social objectives.

The Code of Ethics must be considered an integral part of the employment contracts in force and to

be entered into, pursuant to the applicable legislation on the “Diligence of the employee” (Art. 2104 of the Italian Civil Code).

Violation of its provisions will therefore constitute a disciplinary offense and will be prosecuted and sanctioned by the Company in accordance with and for the purposes of Art. 7 (“Disciplinary sanctions”) of Law No. 300/1970 (“Workers’ Statute: rules on the protection of the freedom and dignity of workers, freedom of trade union activity and the activity of trade unions in the workplace, and placement rules”) and may result in compensation for damages caused to the Company.

Adherence to the principles expressed in the Code of Ethics constitutes an essential condition for the execution of contracts of any kind between the Company and its stakeholders; the conditions contained in the Code of Ethics therefore become in effect an integral part of those contracts. Therefore, any violations by such parties of the provisions contained in the Code, depending on their severity, may justify the Company’s withdrawal from contractual relationships in place with those parties and may be identified in advance as causes for automatic termination of the contract pursuant to Art. 1456 of the Italian Civil Code (“Express termination clause”).

1.1. Company Profile

Holiday Depilatori S.r.l. is a major business enterprise established in 1975, the year in which its founder, Vincenzo Vizzini, bet on the hair removal business to make a name in the cosmetics world. Since 2005 Holiday Depilatori has been an S.r.l. (limited liability company) that operates from its own facility, producing products in Italy and exporting them to over 40 countries worldwide.

1.2. Company Values

The adoption of this Code of Ethics is an expression of a corporate environment strongly oriented towards the values of legality, transparency, fairness and professionalism, which are pursued also by opposing behaviors that violate legal provisions or the values that the Company commits itself to promote. Holiday Depilatori S.r.l. rejects and firmly condemns any type of conduct that is contrary to, or in any case violates or contradicts, existing laws, whether carried out by a single individual or by multiple individuals united by any bond, agreement or relationship.

The Code of Ethics is to be understood as a fundamental tool for guiding all those who operate in the name or on behalf of the Company (hereinafter simply referred to as the “Recipients” of the Code) toward correct behavior and proper conduct in their business activities, especially in dealings

with internal and external counterparts (“stakeholders”).

This Code of Ethics is endorsed and approved by the Company and constitutes an integral part of the Organization, Management and Control Model (hereinafter also simply referred to as the “Model”), as provided by Legislative Decree 231/2001 on the “Regulation of the administrative liability of legal entities” (hereinafter also simply referred to as the “Decree”).

1.3. Purpose and Scope of Application of the Code of Ethics

The conduct principles expressed in the Code form the basis of the Company’s corporate culture; each employee, collaborator and, in general, every stakeholder is therefore firmly required to comply with the provisions contained therein, as well as with all the contents and procedures present in the Model.

In this sense, the Company undertakes not to initiate or continue any relationship with parties who do not intend to align with these principles.

The Company is committed to respecting the content of the Code in carrying out all its activities and to maintaining correct conduct in business, based on the principles of integrity and loyalty, avoiding both personal and corporate conflicts of interest. In this sense, it is the precise duty of all Recipients to know the content of the Code of Ethics, understand its meaning, and, if necessary, take steps to ask for clarifications regarding it.

It should be noted that lack of knowledge of the provisions of this Code does not exempt anyone from responsibility; it is the duty of all Recipients to know its content, understand its meaning, and, if necessary, seek clarifications regarding it. On the other hand, it is the Company’s task to ensure correct and timely dissemination of the Code itself and, in general, of the entire Model, as detailed in the General Part.

2. CORPORATE MANAGEMENT

This chapter defines the principles that guide the Company’s behavior in carrying out its internal activities, with particular attention to the impact of these activities on civil society, on the surrounding environment, and with regard to those persons included in the Company’s organizational chart.

2.1. Compliance with Laws and Regulations

The Company recognizes compliance with the laws and regulations in force in Italy and in all countries in which it operates as indispensable and essential, and undertakes not to initiate or continue any relationship with anyone who does not intend to adopt and strictly observe this principle. Any conduct that could constitute or amount to behavior relevant to any type of offense must be considered prohibited, especially if it is contemplated by the Decree.

2.2. Confidentiality, Transparency and Fairness

The Company identifies confidentiality, transparency and fairness as the fundamental values of its activities and bases every decision, behavior and process on them. In this sense, it undertakes to ensure that every operation and transaction is properly recorded, authorized, verifiable, legitimate, consistent and appropriate, within the limits and provisions defined by law; it also undertakes to make it possible to verify the process of decision-making, authorization and performance of those activities recognized as most at risk, as defined in the Special Part of the Model.

All persons involved in such processes, each for the part under their own competence and responsibility, are required to ensure the utmost truthfulness, transparency and completeness of the verbal and documentary information produced in the course of conducting the activities, whether in paper or digital format.

All individuals who participate in the preparation of the data contained in financial statements, company reports and in all corporate communications required by law must adhere to these principles and diligently verify the accuracy of the information.

Employees, collaborators and generally individuals who have relationships with the Company are required to safeguard, in accordance with the principle of confidentiality, the protection of the body of technical, commercial, industrial, financial, legal, administrative knowledge and, in general, all information obtained in relation to the duties and assignments performed recognizing that such information is the exclusive property of Holiday Depilatori S.r.l.

Finally, the Company commits to base every action related to communication, promotion or public information activities on the aforementioned principles, in order to provide a complete and correct view of the characteristics, principles, and entities that are part of the Company itself.

2.3. Health, Safety, Personal Well-being, and Respect for Individuals

Holiday Depilatori S.r.l. repudiates all forms of discrimination, corruption, forced or child labor and does not tolerate any violations of human rights, operating within the framework of the United

Nations Universal Declaration of Human Rights, the fundamental conventions on the subject and the I.L.O. (International Labour Organization).

Furthermore, in the context of their work activity, the Recipients must always conduct themselves in an absolutely respectful manner toward the people with whom they come into contact on behalf of Holiday Depilatori S.r.l., treating everyone equally and with dignity.

The protection of individuals' health and safety is recognized by the Company as a primary objective, and it is committed to carrying out its activities in full compliance with current legislation on the protection of health and safety in the workplace, as well as with the specific applicable regulations on prevention.

The Company also undertakes to ensure safe and healthy working conditions aimed at protecting the physical and moral integrity of individuals, including through activities suggested or indicated by the workers themselves, with a view to establishing a fruitful relationship of dialogue and collaboration aimed at the progressive and constant improvement of those conditions.

2.4. Environmental Protection

Operating in a sector that is constantly, heavily and directly affected by processes related to waste management and its proper treatment, Holiday Depilatori S.r.l. recognizes that environmental protection issues play not only a central role, but certainly also an indispensable part of its very structure and nature. In this sense, all daily activities and every planning of future developments or projects are oriented, with particular attention to compliance with the requirements contained in the authorization documents in the Company's possession and with national and European sector regulations.

The Company commits to making every effort on a daily basis to maintain and constantly improve all behaviors and procedures aimed at ensuring scrupulous and complete compliance with the regulations and authorization requirements, both its own and those of subjects who interact with it in any way, consistently and mandatorily placing the compliance with these rules at the foundation of any working relationship. In parallel with carrying out its activities, it also commits to daily promoting a culture of legality and respect for the environment as a defining element of its image and corporate identity. Holiday Depilatori S.r.l. also promotes environmental protection through communication and promotional initiatives, identifying it as a qualifying element and intending to

emphasize the centrality of these issues in defining its profile, by raising public awareness of these topics and supporting all initiatives aimed at steering industrial activities towards models based on sustainability.

2.5. Protection of Privacy

Pursuant to the legislation in force on privacy, and therefore data protection with particular reference to EU Reg. 679/2016, the Company ensures that the information and data acquired and handled in the course of its activities, and possibly entered into specific databases, are used within the limits established by company procedures and in compliance with national and EU regulations, with particular reference to activities of collecting, processing, comparison, deletion, modification, communication or dissemination of the same.

The same principles are applied by the Company also with regard to the processing of information related to its own employees and collaborators, avoiding any improper use of this information both within and outside the company.

2.6. Compliance with Tax Laws and Methods of Payment

Pursuant to current tax legislation, the Company is committed to the utmost compliance with tax laws and regulations, refraining from any behaviors that would tend not only to violate the aforementioned regulations but also to circumvent them.

With the aim of ensuring the utmost compliance with tax regulations, the Company will not make payments in cryptocurrencies, an instrument often used for untraceable payments and for unlawful purposes.

2.7. Conflict of Interest

The planning, organization and performance of any activity must always be guided by the aim of avoiding situations in which the individuals involved are or may even only appear to be in situations of a “conflict of interest”; by this is meant cases in which a Recipient pursues an interest different from the Company’s mission or gains a personal advantage from the Company’s opportunities or activities.

It is therefore recognized as a precise duty of all employees, collaborators and Directors of the Company to constantly act to avoid and prevent the emergence of a conflict of interest; anyone who

becomes aware, even only potentially, of the occurrence of such a situation is required to immediately inform the Supervisory Body.

In order to uphold the principles of fairness and transparency, as well as to ensure the trust of the community and the beneficiaries of its actions, the Company ensures that all Recipients of this Code do not find themselves in a condition of conflict of interest.

2.8. Proper Management of Company Assets

Each employee or collaborator is required to use the Company's assets with diligence and responsibility, paying the utmost attention to their preservation and protection.

Company assets must be used in an appropriate manner and in line with the Company's interest, and any use of the same by third parties is strictly prohibited in order to prevent misuse. Their use is also prohibited for personal needs or purposes unrelated to business reasons, for purposes contrary to legal provisions, public order or morality, as well as to commit or induce the commission of crimes or in any case to incite racial hatred, glorify violence, engage in discriminatory acts or violate human rights.

With particular regard to IT tools, it is expressly forbidden to engage in any conduct that could damage, alter, deteriorate or destroy the Company's or third parties' IT or telematic systems, programs or data, as well as to illegally intercept or interrupt IT or telematic communications. It is also forbidden to unlawfully access IT systems protected by security measures or to procure or disseminate access codes to protected IT or telematic systems.

2.9. Compliance with Copyright Law and Combating Cybercrime

Holiday Depilatori S.r.l. condemns any form of fraud, counterfeiting or usurpation of intellectual property rights, calling upon all stakeholders to strictly comply with the existing legislation protecting instruments or marks of authentication, certification or recognition, protecting industry and commerce, and regarding copyright law.

The Company safeguards its own intellectual property rights, including copyrights, patents, trademarks and identification marks, adhering to the policies and procedures provided for their protection and likewise respecting the intellectual property of others. Therefore, the unauthorized reproduction of software, documentation or other copyrighted materials is against Company policy, and the use or reproduction of software or documentation beyond what is permitted by licensing

agreements with suppliers is prohibited.

Beyond the above measures, the Company is committed to implementing every appropriate procedure to effectively combat cybercrime; therefore, the improper use of IT tools that could even potentially result in the commission of crimes or behaviors not in line with what is prescribed by law or by the Model is absolutely forbidden in the corporate context. Examples include unauthorized access to third-party IT or telematic systems, the unlawful interception, hindering or interruption of IT or telematic communications, damage to information, data and private IT programs or those used by the State or another public body or by public utility, and damage to IT or telematic systems whether private or of public utility.

Furthermore, the unauthorized possession and distribution of access codes to IT or telematic systems, the dissemination of equipment, devices or computer programs designed to damage or interrupt an IT or telematic system, as well as the installation of equipment aimed at intercepting, impeding or interrupting IT or telematic communications, are categorically prohibited.

2.10. Respect for Personal Dignity

With a view to protecting fundamental human rights and in light of its own basic principles, Holiday Depilatori S.r.l. strongly rejects any form of discrimination, whether racial, territorial or religious in nature. It is committed to carrying out daily monitoring and counteraction of practices contrary to these principles such as marginalization, homophobia, xenophobia and other acts or attitudes that may constitute even only potential forms of discrimination.

The Company also deems unacceptable any type of violence, harassment or unwanted behavior that violates or may even only potentially violate the human dignity of individuals, with particular reference to any form of sexual harassment or harassment related to personal, cultural or religious differences.

2.11 Compliance with Regulations on International Trade Control

As a supplier of products destined for many countries around the world, the Company recognizes as indispensable and essential compliance with laws and regulations governing the import and export of goods, and refrains from engaging in transactions with certain countries or with individuals and entities subject to trade sanctions.

Compliance with customs laws, even where they impose restrictions on the import and export of

goods to certain countries, is a priority for the Company and more generally the utmost attention is given to ensure compliance with international trade regulations in force in the countries where Holiday Depilatori S.r.l. operates.

The Company observes all applicable international trade laws and laws on economic sanctions and embargoes, including by way of example but not limited to the laws of the United States, the United Kingdom, the European Union or other trade restrictions with countries or regions subject to economic sanctions and embargoes.

Likewise, the Company does not trade with non-authorized persons, entities or countries, nor does it allow third parties to be asked to be part of such activities on behalf of the Company itself. On the other hand, the Company does not engage in nor does it intend to give the impression of supporting boycotts against certain countries or companies that are not subject to sanctions.

3. RELATIONS WITH EXTERNAL STAKEHOLDERS

This chapter defines the principles that guide the Company's behavior in carrying out activities that involve relations with stakeholders external to it.

3.1. Competition and Market Abuse

The Company recognizes fair competition as a fundamental element for the development of the business and the territory in which it operates; in this sense, it undertakes to refrain from collusive, predatory and abusing dominant market position practices, in compliance with current regulations and the provisions of the Authorities responsible for market regulation. In particular, Holiday Depilatori S.r.l. commits not to use others' trade secrets, not to engage in conduct aimed at hindering the operations of competing companies, and not to carry out fraudulent acts capable of causing damage to a competitor.

In terms of market abuse, it is expressly forbidden for anyone in possession of inside information to engage in the following conduct:

Insider trading: Buying, selling or carrying out other transactions, directly or indirectly, for one's own account or for third parties, in financial instruments using this information.

Improper disclosure: Disclosing such information to others, outside the normal exercise of one's job, profession, function or office.

Tipping and encouraging: Recommending or inducing others, on the basis of this information, to carry out the transactions described in the previous points.

Market manipulation: Spreading false news or conducting simulated transactions or other devices that are concretely likely to cause a significant alteration in the price of financial instruments.

3.2. Relations with Customers

The Company pursues the goal of fully satisfying the expectations and needs of its customers; in this sense, it is committed to building long-lasting and profitable relationships with all clients, paying the utmost attention to the quality of outgoing products, to the specific needs of individual customers, operating daily inspired by principles of fairness and professionalism, and giving the greatest attention to availability and promptness of communications as needed or requested from time to time.

In order to ensure high-quality products in line with customer needs, the Company carries out rigorous checks on incoming materials, in-process materials, and outgoing products, both through visual inspection and by using appropriate technical instruments.

Holiday Depilatori S.r.l. also undertakes to implement all measures useful for preventing any contact with organized crime; in the absence of and pending appropriate industry procedures standardized by law, the Company provides and describes in detail in the Special Part of this Model a series of procedures specifically dedicated to this purpose, with particular reference to company searches, database inquiries and other forms of investigation permitted by law aimed at obtaining information on third parties.

3.3. Relations with Suppliers

Relationships with suppliers are based on the constant and mandatory respect for the principles of fairness, transparency and good faith; in this sense, the Company undertakes to evaluate orders for the supply of goods and services on objective and transparent parameters such as quality, service, price and support, and to favor, where possible, the establishment of a long-lasting collaboration in the mutual interest of the parties.

At the time of purchase, strict preliminary verification procedures are carried out, including in particular:

- Verification of the validity of the supplier's VAT number.
- Verification of the validity of the supplier's Tax Code.
- Verification of the existence and origin of the production material.
- Verification of the existence of the supplier of the material.

The details of these procedures are described in full in the Special Part of this Model and a negative outcome, even partial, of any one of them results in the impossibility of making the purchase, with no possibility of waiver or exception.

In order to promote and spread the principles of legality and fairness in the commercial sector, Holiday Depilatori S.r.l. undertakes to provide free of charge to all suppliers, even potential ones, all the necessary information regarding industry regulations and the procedures contained in this Model, in order to facilitate the achievement of the required standards.

Regarding the origin of goods, the Special Part of this Model specifies procedures deemed suitable to maximally reduce the risk of crimes such as, for example, receiving stolen goods or smuggling offenses.

Furthermore, as already indicated with regard to relations with customers, the Company undertakes to implement all measures useful for preventing any contact with organized crime; in the absence of and pending appropriate industry procedures standardized by law, it provides and describes in detail in the Special Part of this Model a series of procedures specifically dedicated to this purpose, with particular reference to company searches, database inquiries and other forms of investigation permitted by law aimed at obtaining information on third parties.

3.4. Gifts

In relationships with third parties of any kind, it is strictly forbidden to receive or offer benefits, whether direct or indirect, gifts, acts of courtesy or hospitality, unless they are of such nature and value that they cannot be interpreted as aimed at obtaining favorable treatment and, in any case, do not compromise the image of the Company.

3.5. Relations with the Public Administration

Administrators, employees or collaborators who, in the performance of their functions, interact,

conduct negotiations or simply have dealings with the Public Administration are required to maintain a clear, correct and transparent attitude and must not in any way improperly influence the decisions of the public officials, nor engage in unlawful behaviors such as offers of money, other benefits or professional and personal favors that could alter the impartiality or judgment of the Public Administration representative.

Relations with the Public Administration must be managed only by those directors or employees delegated for that purpose, as expressly indicated in the Organization Chart and the Special Part attached to and forming an integral part of this Model.

Without prejudice to the provisions indicated in the procedures described in the Special Part of this Model, in any case the following guidelines apply:

-It is not permitted to offer money or gifts of any kind to managers, officials or employees of the Public Administration or to their relatives, whether Italian or from other countries, unless they are of such a nature and value that they cannot be interpreted as aimed at obtaining favorable treatment and, in any case, do not compromise the image of the Company.

-Acts of corruption include both illicit payments made directly to public entities or their employees, and illicit payments made through persons acting on behalf of such entities, whether in Italy or abroad.

-It is forbidden to offer or accept any object, service, performance or favor of value in order to obtain more favorable treatment in relation to any relationship maintained with the Public Administration.

-If any business negotiation, request or relationship with the Public Administration is in progress, the appointed personnel must not attempt to improperly influence the decisions of the other party, including those of officials who negotiate or make decisions on behalf of the Public Administration.

-If the Company uses a consultant or other "third" party to be represented in dealings with the Public Administration, it must be provided in the contract governing the relationship between the parties that the same directives applicable to the Company's employees are applied to the consultant and its staff or to the "third" party.

-The Company must not be represented, in relations with the Public Administration, by a consultant or other "third" party when conflicts of interest may arise.

-During a business negotiation, request or commercial relationship with the Public Administration, it is prohibited to undertake, either directly or indirectly, activities aimed at exploring or offering employment and/or commercial opportunities that could benefit Public Administration employees personally, or to solicit or obtain confidential information that could compromise the integrity or reputation of both parties.

3.6. Relations with Financial Institutions

Even in relations with financial institutions, the Company is committed to basing its behavior on the principles of fairness and transparency, in order to constantly operate in an atmosphere of mutual collaboration and in compliance with current regulations. With regard to the arrangement of payments, the Special Part of this Model describes operational methods aimed at ensuring the maximum traceability and full control of transactions, in order to prevent the potential commission of crimes. Regarding the selection of parties, Holiday Depilatori S.r.l. makes its choices by turning to top-tier partners, capable of guaranteeing high quality standards and solid assurances from the perspective of the formal correctness of transactions and relationships.

3.7. Relations with Political Parties, Trade Unions, Associations and Communities

The Company does not provide contributions, direct or indirect, in any form, to parties, movements, committees or political organizations. Relations with trade union organizations are guided by the principles of fairness, impartiality and transparency and are reserved for the Company functions delegated for this purpose. The Company participates in industry associations and conducts its activities in full respect of local and national institutions, social organizations and, in general, all of its stakeholders, contributing to the economic growth of the communities in which it operates.

3.8. Relations with the Press and Media

The Company manages relations with the press and media through a specific corporate function designated from time to time by the Company's Administrator, based on the competencies required. In providing communications externally, this function adheres to the principles of truthfulness, transparency and clarity, ensuring that the information released is consistent, accurate and always in line with company policies and programs. Therefore, employees and collaborators must refrain, unless expressly authorized, from making any public statement regarding the Company's activities.

4. IMPLEMENTATION AND CONTROL

The task of monitoring compliance with this Code, reporting at least annually to the Board of Directors, is entrusted to the Supervisory Body (Organismo di Vigilanza, OdV).

4.1. Communication and Training

The Company undertakes to bring the Code of Ethics to the attention of employees, intermediaries and collaborators with whom it has ongoing relationships, as well as all stakeholders; for their part, these parties are required to fully and totally comply with the principles contained in this Code of Ethics, which may be expressly mentioned in contracts and must be made available to anyone who wishes to review it.

In order to ensure the full and proper understanding of this document by all stakeholders, the function indicated in the Organization Chart periodically arranges and organizes dedicated seminars or training activities, differentiated according to the role and availability of collaborators, also based on the indications of the Supervisory Body. Employees can contact the Supervisory Body at any time by means of a written letter deposited in a special mailbox located in an accessible place, even if only to request information or clarifications regarding components of the Model or the legitimacy of a given behavior or conduct.

4.2. Compliance with the Code of Ethics

Compliance with the Code of Ethics is to be understood as a precise and mandatory duty of each stakeholder.

Failure to comply with this Code of Ethics entails the risk of disciplinary action by the competent bodies of the Company, in line with what is indicated in the relevant chapter of the General Part of this Model.

4.3. Specific Protocols and Compliance with Procedures

i) Specific protocols, aimed at preventing detrimental events and the consequent potential negative impacts on the company's situation, are inspired by the Code of Ethics and are prepared – or appropriately integrated and modified – following an analysis of the company context, aimed at

highlighting the risks facing the company and the existing control system, as well as its actual adequacy. Specific protocols must be adopted – by all those who in any capacity are involved in the operational process – under the terms and in the ways specifically provided and described by the competent functions of Holiday Depilatori S.r.l. Their proper implementation guarantees the possibility of identifying the individuals within the company responsible for the process of decision, authorization and performance of operations: to this end – according to the control principle of separation of duties – it is necessary that individual operations are carried out at the various stages by different persons, whose responsibilities are clearly defined and known within the organization, so as to prevent unlimited and/or excessive powers from being assigned to single individuals. Furthermore, the traceability of every process related to the company's activity must be ensured, so that it is always possible to reconstruct ex post the reasons behind the choices made, the persons responsible, and any relevant data for the purpose of evaluating the correctness of operational choices.

ii) Compliance with procedures. The Recipients, within the scope of their respective competences and functions, are required to strictly comply with procedures. In particular, company procedures must regulate the performance of every operation and transaction, for which it must be possible to ascertain (through the following control elements, which are not exhaustive: dual signatures, supporting accounting documentation, investigations into the activities of sales agents, consultants, suppliers, etc.) the legitimacy, authorization, consistency, congruity, correct recording and verifiability, including in terms of the use of financial resources. Therefore, each operation must be supported by adequate, clear and complete documentation to be kept on file, so as to allow at any time the control of the reasons and characteristics of the operation and the precise identification of who, in the different phases, authorized, carried out, recorded and verified it. Compliance with the guidelines provided by specific protocols regarding the procedural flow to be followed on the formation, decision and recording of company events and their effects also makes it possible to spread and encourage at all company levels a culture of control, which contributes to improving management efficiency and constitutes a support tool for managerial action. Any failure to observe the procedures provided by the protocols and by the Code of Ethics – to be reported without delay to the Supervisory Body pursuant to Legislative Decree 231/01 – compromises the trust-based relationship existing between Holiday Depilatori S.r.l. and those who have relationships with it in any capacity.

4.4. Reports to the Supervisory Body

The Company has adopted a Whistleblower Procedure for handling reports concerning the violation of European and national regulations and the provisions set out in this Code and in the procedure pursuant to Legislative Decree 231/2001. The Procedure was also adopted pursuant to and for the purposes of Legislative Decree March 10, 2023, No. 24, and furthermore integrates the Model adopted by the Company as provided by Legislative Decree No. 231/2001.

All employees who become aware, directly or indirectly, of information regarding behavior not in line with what is provided by the Model have the obligation to inform the Supervisory Body.

This obligation, moreover, falls within the broader duty of diligence and loyalty of the employee; fulfilling it cannot give rise to the application of disciplinary sanctions and confidentiality must be guaranteed for those who report any violations in order to eliminate the possibility of retaliation.

The information received by the Supervisory Body – which for this purpose has a dedicated mailbox (odv@holidaydepilatori.it) – will also be used to improve the planning of control activities.