



natura & co

# Code of Conduct

A better way of living  
and doing business



# Foreword

Natura &Co is a global purpose-driven group uniting Natura &Co Latam and Avon. We connect more than 200 million clients worldwide, engaging them through 7 million dedicated Consultants and Representatives, 900 stores and franchises, and 22,000 employees.

Together, we are guided by the belief that success can only be achieved if we stay true to our values: nurturing beauty and relationships for a better way of living and doing business.

We believe in doing the right things in the right way — and in doing right by all our stakeholders. We are committed to acting with integrity and respect, and to making a positive difference in our communities.

Our unwavering dedication to creating positive change for the world is deeply ingrained in the foundations of our company and sets us apart from our peers. We are steadfastly committed to a triple-bottom-line philosophy: pursuing profit alongside a commitment to creating a positive impact for people and the planet. This is a powerful mission — and an inspiration to each of us at Natura &Co.

While each individual decision that we make may not be calibrated to produce triple-bottom-line impacts, we equally prioritize each of these three objectives across our long-term strategy and operations. This foundational commitment empowers all our colleagues and stakeholders, encouraging them to question how our operations and policies align with, and further, our triple-bottom-line principles.

Our Code of Conduct helps us accomplish that mission by guiding our responsible operations. It outlines the key policies, processes, and behaviours that we expect everyone working for Natura &Co to adhere to, including our commitment to our people, our communities, our business, and our planet.

The Code is much more than a list of rules. It is a practical guide to working together and realizing our potential as individuals and as a collective.

The Code underpins the strong, enduring relationships we have with all our stakeholders and ensures Natura &Co will continue to flourish for generations to come as we

continue on our mission to create the best beauty group *FOR* the world.



**FÁBIO BARBOSA**  
CHIEF EXECUTIVE OFFICER  
NATURA &CO



# Our Shared Purpose

At Natura &Co, we are creating the best beauty group FOR the world.

Our ambitious *Commitment to Life* sustainability vision outlines our bold targets to address pressing global issues. These include taking action against the climate crisis and protecting the Amazon, promoting equality and inclusion, and transitioning our business towards circularity and regeneration.

To fulfil this commitment, we strive to make a positive difference in the communities around us and always act with integrity and respect, following all local laws and regulations in the countries where we operate. We believe in promoting real positive economic, social, and environmental impact. We believe that the world does not need another big company. The world needs symbols of change capable of blazing new trails and inspiring

others to follow. We believe in the power of cooperation, co-creation, and collaboration for a better way of living and doing business.

Our brands are united by these common goals and each of our brands also has its own purpose that guides its business.

→ Natura &Co Latam purpose is **bem estar bem**, which means 'well-being being well.' Founded in 1969, Natura is recognized for its sustainability initiatives to protect the biodiversity of the Amazon. In 2014, Natura became the first publicly traded company to receive B Corp™ certification.

→ Avon believes that **a better world for women is a better world for all**. For more than 135 years Avon has been supporting women by offering innovative and quality beauty products and encouraging

entrepreneurship and well-being.

Avon believes in listening to women's needs, speaking out about issues that matter, and creating positive change.

To help our colleagues live by our shared purpose, we have articulated guidelines for leaders, line managers, and team members across our businesses. These guidelines are laid out in this Code, which sets out what is expected of everyone at Natura &Co.

Our Code has been approved and adopted by our Board of Directors and senior executives.



# Our Code, Our Guide

## To whom does the Code apply?

Our Code applies to all Natura &Co colleagues worldwide, including members of our Board of Directors.

Natura &Co's Ethics & Compliance team is responsible for promoting, monitoring, and enforcing compliance with this Code.

Third parties working with Natura &Co, such as suppliers, contractors, franchisees, agents, and distributors, should adhere to applicable policies and procedures as outlined in our Supplier Code of Conduct and Reseller Code of Conduct.

## What is covered by the Code?

The Code covers four core commitments: to our people, to our wider communities, to our business, and to our planet.

The Code outlines the key policies and procedures we expect our colleagues to follow, consistent with all applicable laws and regulations.

The Code includes guidance on acting in an ethical and responsible way when doing business, which helps ensure that we all make a positive impact with each of our interactions.

If the Code does not cover a specific topic, we expect our colleagues to

exercise sound commercial and ethical judgement and to contact their line managers with questions or concerns.

## What is my personal responsibility?

Adherence to this Code, including the policies and processes outlined in the Code, is a condition of working at Natura &Co – whoever and wherever you are.

All our colleagues are required to timely complete training courses on our Code and related policies on an annual basis. Our ethics and compliance training program also requires certain colleagues to complete additional training courses related to their roles.

At Natura &Co, we expect you to be committed to making a positive impact through all your interactions, feel supported in making the right ethical choices when faced with difficult dilemmas, and be confident about the right course of action to take.

Put simply, in all your interactions on behalf of Natura &Co, you should ask yourself the following:

→ **Are you doing the right thing without exception?**

→ **Are you treating others as you would like to be treated?**

→ **Would you be proud if this interaction were made public?**

Our leadership team and line managers are responsible for promoting adherence to this Code through appropriate communication, training, and modelling behaviours.

Compliance with the Code

If a colleague or third party becomes aware that one of our colleagues is out of compliance with this Code – either in its letter or in its spirit – they should report their concerns, as set out below.

Failure to adhere to this Code may lead to disciplinary action, up to and including termination. Compliance with this Code is a condition of employment, above and beyond any applicable legal or regulatory requirements.

## No exceptions

As a general matter, there are no exceptions to compliance with this Code. In the rare circumstances where an exception is appropriate, prior written approval is required from our Chief Compliance Officer or, in certain circumstances, our Board of Directors or a committee thereof.

# Making Reports of Possible Violations

Natura &Co has numerous resources to raise concerns or ask questions about ethics and compliance topics, including:

- Your line manager;
- Your HR partner;
- Your Legal partner; and
- Your Ethics & Compliance partner.

The Natura &Co Global Whistleblower Policy is also available to employees and third parties.

If you receive any report of a potential violation of this Code, including the policies, laws, or regulations applicable to Natura &Co, you must forward it directly to the Ethics & Compliance Investigations team to ensure it is handled in accordance with our protocols. Unless explicitly directed to do so by Ethics & Compliance, you must not conduct your own investigation of any report of a violation of the Code.

In addition to the above channels, you may make an ethics or compliance report through Natura &Co's anonymous reporting hotline. The Natura &Co Ethics Line can be

accessed, both inside and beyond our company, online or by toll-free phone 24 hours a day, 7 days a week. It is operated by an independent third party and is available in 23 languages.

Although reports through the Ethics Line may be made anonymously, we encourage reporters to identify themselves when making a report

to enhance our ability to fully and adequately investigate and address any issues that might arise.

In the European Union, there are some restrictions on the ability to make reports on certain topics. Questions about these restrictions should be addressed to the Ethics & Compliance team.



### Conducting investigations

The Ethics & Compliance team will assign an experienced professional to investigate any reports pursuant to Natura &Co's investigation protocols. All Natura &Co colleagues must cooperate in any investigations, including by answering all questions, providing complete and truthful information, and by preserving relevant documents and evidence. Colleagues must not otherwise interfere with an investigation in any way.

If an investigation substantiates a violation of the Code, the Ethics & Compliance team will establish an internal management remediation committee, and if the offending individual is an employee, they will be subject to disciplinary action, up to and including potential termination of employment.

Throughout the investigation process, Natura &Co will keep reports confidential to the greatest extent possible and consistent with its ability to conduct a full and fair investigation and act in the best interests of the company and in keeping with our legal obligations.

### Zero tolerance for retaliation

This Code prohibits retaliation against any colleagues for making a report or raising concerns about a possible

violation of the law, the Code, or other company policies. Retaliation includes any adverse action (e.g., termination and unjustified exclusion from work meetings and projects) taken as punishment or otherwise in connection with raising a concern about a potential violation.

Any person who believes that they may have experienced retaliation should promptly report this behaviour to the Ethics & Compliance team.

[CLICK HERE TO EXPLORE OUR WHISTLEBLOWER POLICY](#)

### IF YOU NEED MORE HELP

Please contact either your line manager, HR partner, Legal partner, or your Ethics & Compliance partner.

### REPORTING MISCONDUCT

We believe, as a group, that everybody should feel safe to speak up through our Natura &Co Ethics Line and other reporting channels.



In support of our *Commitment to Life*, our Ethics Line is also available to third parties. We expect our suppliers, resellers, and other partners to be committed to our high standards of ethical conduct, and for the front-line workers in our supply chain to be protected from abuse and exploitation. Third parties may make reports where they consider there is non-compliance with our Supplier Code of Conduct or Reseller Code of Conduct. In addition, third parties may report alleged violations by our colleagues of this Code of Conduct.

# Our Commitments

Natura &Co is committed to making a positive impact on our people, the communities in which we operate, and our shared planet and environment. We have made specific commitments and adopted policies to operationalize these commitments.

Explore these commitments on the following pages:

- Our commitment to our people
- Our commitment to our communities
- Our commitment to operating responsibly
- Our commitment to the planet





A young boy with dark hair and a bright smile is the central focus. He is shirtless and looking towards the camera. To his right, a large, out-of-focus hand reaches towards him, palm facing forward. The background is a soft-focus outdoor setting with greenery and rocks.

# Our Commitment to Our People

Our *Commitment to Life* sustainability vision outlines our commitment to human rights, equality and inclusion across our operations and affiliates.

This section details key processes and policies – including our health and safety policies, approach to diversity, equity and inclusion, and our anti-harassment, anti-violence and anti-discrimination policies – which ensure that we live up to these commitments.

# Diversity, Equity & Inclusion

We expect all our colleagues to always treat each other with respect. Underpinning this approach, each of our businesses has its own diversity and inclusion policy to foster an inclusive environment that encourages diverse capabilities, skillsets, and mindful allies.

We are committed to providing a non-discriminatory and gender equitable workplace, and we expect all colleagues to act in a fair manner. As such, we aim to provide equal opportunities to all job applicants and colleagues and will not tolerate any form of prejudice or discrimination, including in hiring, compensation, and training. To support us in this mission, we champion voices across our organization through various Employee Resource Groups (ERGs) and Councils made up of colleagues from across our businesses. These groups act as a sounding board for colleagues within Natura &Co, providing a safe space to raise emerging challenges and explore solutions on our diversity, equity and inclusion journey.





Across our collective, we have a rich history of creating economic opportunities for women around the world through our network of Consultants and Representatives - arming them with tools, training, and support to start and scale their own businesses. In fact, in 1886, 34 years before women were able to vote, Avon created an opportunity for many to earn an independent income.

As a group, we remain committed to ensuring the rights of women, gender equality, and economic empowerment. We uphold the UN Convention on the Elimination of All Forms of Discrimination against Women. In addition, Avon has a long-standing track record of donating to NGOs supporting women's causes and is committed to speaking out about gender violence. The brand has contributed US\$1.1 billion to date with an average of US\$10 million+ donated every year for the past decade.

We support our managers through regular training to help them lead inclusively, build diverse teams, and fully integrate our *Commitment to Life* goals into their teams' behaviours.

These goals, inspired by the UN Women's Empowerment Principles, memorialise our commitment to our people through gender-based targets for our business, including:

- Equal representation with at least 50% women in the senior team;
- Equitable pay by closing the gender pay gap; and
- A company-wide living wage.

We ensure our well-being priorities are closely linked with our diversity and inclusion agenda, so we are mindful of everyone's needs across Natura &Co. Across our businesses, there is a variety of information, tools, and interactive resources to help support the mental and physical health of our colleagues. All colleagues play a role in creating an open and inclusive culture by actively supporting and prioritizing one another's well-being.

All colleagues are responsible for ensuring full compliance with diversity, equity, and inclusion policies.

# Health & Safety



We all have a duty to promote a safe and healthy environment for our colleagues, partners, customers, and anyone else who visits any Natura &Co facility or site. Our company follows all health and safety laws and each of our businesses has adopted corporate health, safety, and security policies to ensure a high standard of health and safety across our global operations.

All our colleagues have a role to play in safeguarding their own health and safety — and that of their teams. We expect anyone working for or with Natura &Co to adhere to all applicable company policies and legal requirements related to health and safety.

Colleagues present on Natura &Co premises may not possess, purchase, sell, manufacture, dispense, or otherwise be under the influence of alcohol or illicit substances, as defined by applicable local laws.

**TO REPORT A HEALTH AND SAFETY CONCERN**, please make a report to your line manager, Health & Safety partner, or HR partner.

# Anti-Discrimination, Harassment & Violence

Central to our inclusive and equitable culture is a zero-tolerance policy for any form of discrimination. We treat everyone fairly and with dignity and respect and provide our colleagues with an equitable workplace free from discrimination, including but not limited to disparate treatment based on gender, race, caste, nationality, religion, disability status, pregnancy, marital status, physical or mental health, union membership, political affiliation, age, retirement, sexual orientation, ethnicity, or other legally protected characteristics.

We do not tolerate offensive behaviour of any kind, including harassment, sexual harassment, bullying, or victimization.

Prohibited "harassment" can take many forms, including threats, humiliation, degradation and otherwise offensive or unwanted behaviours. This includes unwelcome comments or jokes, the sharing of offensive material and unwanted advances or sexual remarks. We comply fully with all applicable legal requirements with respect to harassment, discrimination and bullying in the workplace.

We are committed to ensuring a safe and respectful environment for everyone and condemn any actions that compromise the well-being of individuals in our workplace. This applies to the behaviour of all our colleagues as well as third parties, including visitors on our premises.

We have a zero-tolerance policy for workplace violence and prohibit the possession of any weapons within our facilities, to the extent consistent with applicable local and national laws.



The first Representative at Avon was Mrs. Persis Foster Eames Albee, known affectionately as the 'Mother of Avon!' Mrs. Albee was employed in 1886 by Avon's progressive founder David H. McConnell, long before women had the right to vote or had a true means of financial independence. Mrs. Albee was a courageous game-changer who initiated innovations that transformed the company and created opportunities for countless women. Her influence lives on today. In the years since Avon was founded, there has been considerable progress in addressing the inequalities that women face. Nonetheless, we cannot rest because inequality persists and women and girls around the world still experience discrimination. Across Natura &Co we are calling for that to change.

# Further Information

## IF YOU NEED MORE HELP

Please contact either your line manager, HR partner, Legal partner, or Ethics & Compliance partner.

## REPORTING MISCONDUCT

We believe, as a group, that everybody should feel safe to speak up through our Natura &Co Ethics Line and other reporting channels.



## QUICK LINKS

→ To download our *Commitment to Life*, [click here](#)

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# *Our Commitment to* **Our Communities**

Being a group that nurtures beauty and relationships for a better way of living and doing business, we are committed to helping others and engaging in initiatives that make a positive impact to the communities in which we operate.

This section explains how we operationalize these values and describes our policies and procedures with respect to our Consultants and Representatives Distributors and Franchisees, employee charitable and political involvement, human rights, and ensuring safety and transparency within our supply chain.



# Our Resellers: Consultants & Representatives, Distributors & Franchisees



We operate a diverse distribution network of independent Consultants, Representatives and other resellers such as direct distributors, franchisees, retailers, wholesalers, stockists, and joint ventures.

Our distribution network is designed to ensure that each of these stakeholders can work with us to support the sustainable and ethical growth of their own businesses.

Accordingly, Natura &Co requires each of our independent Consultants and Representatives to comply with direct sales codes of conduct and requires distributors, franchisees and other resellers to comply with our Reseller Code of Conduct, in each case as applicable and in addition to all local laws and standards in their markets.

*Beauty Consultants  
Aline Santos, Teresa Iacovino,  
Daniela Marinho, Jaqueline Milanzeni*



# Direct Sales & Retail Practices

## Direct Sales Practices

Natura &Co has a rich history of using our global network of independent direct sellers to create economic opportunity. We are an active member of the World Federation of Direct Selling Associations (WFDSA) and other leading direct sales trade associations and are committed to adopting and implementing industry-leading ethics and compliance standards across our direct sales network.

We expect each of our colleagues and affiliates that support our global network of independent direct sellers to fully adhere to the letter and spirit of these ethics and compliance standards.

## Retail Practices

Natura &Co is proud to provide access to its products through many resellers in the retail sales industry. Retail provides interaction with millions of people every day.

We must all do our part to ensure, through our own interactions with our resellers and our retail trade associations, that the retail experience and sale of our products is in full compliance with applicable laws and ethical and compliance standards.

We require our retailers to fully comply with our Reseller Code of Conduct.

[CLICK HERE TO EMPLORE THE WFDSA CODE OF ETHICS](#)

[CLICK HERE TO EXPLORE OUR RESELLER CODE OF CONDUCT](#)



**Emana Pay**, our financial services platform, promotes digital and financial inclusion for our independent Consultants and Representatives in Latin America. Our Consultants and Representatives who use the platform generally have higher activity and lower payment default levels. The platform aims to support Consultants and Representatives through greater access to financial services such as digital payments and credit.

# Our Customers

We are proud to serve more than 200 million customers worldwide and are committed to ensuring the highest standards of consumer protection across each of our product lines.

## Product Quality & Safety

We believe in creating innovative beauty products of the highest quality. We have adopted internal quality-control standards and are committed to complying with all applicable legal and regulatory quality and consumer protection standards and requirements.

Our reputation is built upon the uniform and consistently high quality of our products, and we have adopted policies and procedures to ensure that each one of our products, and all of our affiliates, meet our high standards. Our commitment to producing quality products begins with our research and development teams, who consistently work to develop products tailored to our customers' needs. Throughout our supply chain, we have adopted rigorous standards to ensure that our products are made with ethically sourced materials, are produced in

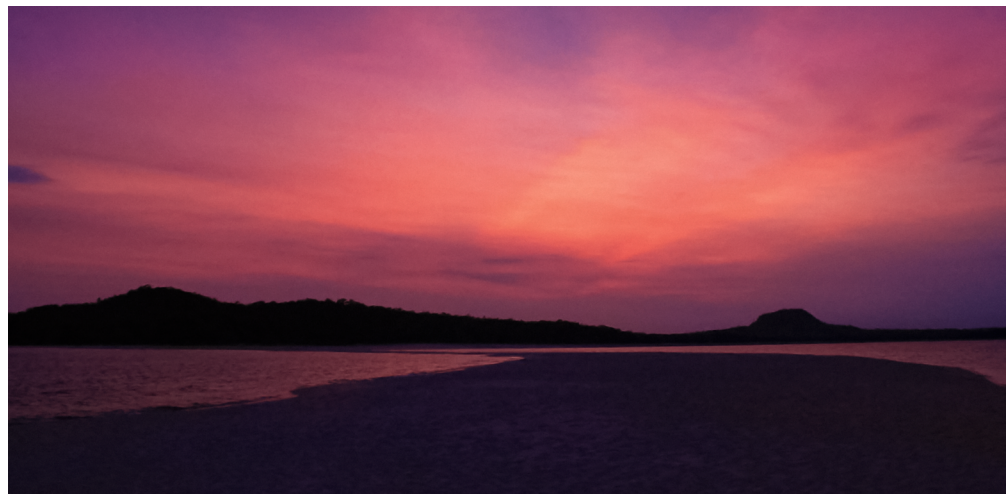
a safe and sound manner, and are packaged and delivered with quality and care.

In addition, only ingredients that can be used safely are used in our products. Every ingredient in every product must undergo a thorough and formal review, and the safety of every product is substantiated prior to product introduction.

Equally important, we evaluate any new information relevant to the safe use of existing ingredients. If we determine through scientific inquiry that an ingredient could no longer be considered to be used safely, or if ever prohibited by law, we would discontinue its use.

We expect each of our colleagues and affiliates to fully adhere to the letter and spirit of our supply chain and quality control policies and procedures, and all applicable quality control and safety standards.

We also expect our supply chain partners to adhere to the standards that we have set to ensure the integrity of our supply chain. When working with our supply chain partners, our colleagues should explain our policies and adopt and implement procedures to monitor our partners' continued compliance with all applicable Natura &Co policies and legal requirements.



## Responsible Marketing

When we market our products, we are committed to doing so with honesty, transparency and integrity. Our responsible marketing principles require that all of our marketing be:

- Honest;
- Truthful;
- Transparent;
- Respectful; and
- Non-discriminatory.

We are also committed to ensuring that our marketing reinforces our core brand principles and values. Whenever we communicate publicly and with our customers, we must be careful to do so honestly, accurately, and in compliance with applicable laws and regulations, including those related to fair market, fraud, and solicitation.

One example that is very important to us and our customers is that we do not make any exaggerated claims related to the environmental or other societal benefits of our products or services.

We are also committed to respecting and fairly using our own intellectual property and that of any third parties, including our suppliers, distributors, and affiliates.

These core principles of marketing and brand stewardship also apply to our resellers. Whenever our resellers engage in communications related to the marketing, sale or distribution of Natura &Co products, they must abide by our communications and marketing policies as set out in our Reseller Code of Conduct.



The Natura brand is taking an innovative step in measuring the impact generated by its business in the social, environmental and human spheres by launching our Integrated P&L, called IP&L. We believe that the value of a company is connected to its capacity to contribute to the evolution of society.

# Our Suppliers



Our Supplier Code of Conduct sets Natura &Co's expectations of compliance with applicable local and international laws, rules, regulations, and official requirements, including, but not limited to, human rights, modern slavery, employment practices, sustainability and environmental responsibility, anti-corruption, anti-money laundering, trade sanctions, privacy and data protection, and information security.

All colleagues have a role to play in ensuring our suppliers conduct their business with transparency and integrity and are committed to the highest standards of ethical conduct and environmental practice.

You must only hire or retain suppliers in accordance with our procurement policies and internal procedures.

**[CLICK HERE TO EXPLORE OUR GLOBAL PROCUREMENT POLICY](#)**

**[CLICK HERE TO EXPLORE OUR SUPPLIER CODE OF CONDUCT](#)**

# Charitable Contributions & Political Donations

We believe in driving positive economic, social, and environmental change. We are delighted to support our colleagues as they dedicate their personal time, resources, and attention to causes and movements that inspire them and help to improve our planet and our communities.

However, because donations to charitable and political causes can implicate legal obligations for both our colleagues and our company, it is important to consult applicable Natura &Co policies before making certain types of contributions.

## Charitable Contributions

Charitable contributions that are made on behalf of our company or any business units require advance approval from a member of management, and our Ethics & Compliance and Controllers teams.

## Political Donations

Natura &Co does not make direct or indirect contributions to political campaigns, organizations, parties, committees, unions, or candidates.

While you are, of course, free to donate to political causes in your individual capacity, we expect all of our colleagues to respect our corporate policies and refrain from directly or indirectly supporting political campaigns, candidates or causes in a corporate capacity or using corporate resources. Any exceptions must be approved by our Board of Directors.

[CLICK HERE TO EXPLORE OUR ANTI-CORRUPTION POLICY](#)



Natura &Co is committed to respecting and supporting the UN Guiding Principles on Business and Human Rights and internationally recognized human rights, as defined by the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Rights at Work, and the ILO Declaration on Multinational Enterprises. We are also a proud signatory to the UN Global Compact and the UN Women's Empowerment Principles.

In 2021, we launched our Global Human Rights Statement, identifying our clear commitments to: Prevent and mitigate human rights risks such as harassment, discrimination, and child and forced labour; and promote decent and safe working conditions, gender equality and equal treatment for marginalized groups, fundamental individual rights (including privacy rights, freedom of association, and collective bargaining rights), and our collective rights to a safe and healthy environment across our businesses.

[CLICK HERE TO EXPLORE OUR HUMAN RIGHTS STATEMENT](#)

# Further Information

## IF YOU NEED MORE HELP

Please contact either your line manager, HR partner, Legal partner, or Ethics & Compliance partner.

## REPORTING MISCONDUCT

We believe, as a group, that everybody should feel safe to speak up through our Natura &Co Ethics Line and other reporting channels.



## QUICK LINKS

- To download our Reseller Code of Conduct, [click here](#)
- To download the WFDSA Code of Ethics, [click here](#)
- To download the Global Procurement Policy, [click here](#)
- To download our Supplier Code of Conduct, [click here](#)
- To download our Anti-Corruption Policy, [click here](#)
- To download our Human Rights Statement, [click here](#)



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# *Our Commitment* **to Operating Responsibly**

We expect all Natura &Co colleagues to conduct business activities with transparency and integrity, and in full compliance with applicable laws and regulations.

Our commitment to operating responsibly is built upon the foundation of our corporate structure and governance. We are a B3 listed company on the Brazilian Stock Exchange and comply with the Novo Mercado corporate governance rules and the Brazilian Code of Corporate Governance, as well as the recommendations published by the Brazilian Institute of Corporate Governance (IBGC).

This section describes some of our policies – including our policies on information sharing and data security, conflicts of interest, and compliance with anti-corruption and trade laws – which help ensure that we remain in full compliance with all applicable legal obligations and requirements.

# Preservation & Appropriate Use of Natura &Co Assets

Our corporate assets facilitate our operations, and we expect our colleagues to exercise judgment and appropriate care in the treatment and use of Natura &Co assets. Specific business units have established policies governing the use of Natura &Co assets, such as our real estate, office furnishings, electronics and appliances, vehicles, production equipment, intellectual property and trade secrets, inputs and raw materials, and financial assets. We expect every employee to adhere fully to these guidelines.

## Intellectual Property

Natura &Co brands, innovation and other creative activity are some of our most valuable assets. They are protected through various types of intellectual property including trademarks, copyright, patents, designs, domain names, confidential information, and know how.

We must all ensure that Natura &Co brands and other intellectual property rights are used correctly and protected at all times. Third

parties should only use our intellectual property with appropriate approval.

Our Natura &Co intellectual property policies ensure that our intellectual property is used consistent with our values and beliefs, and in furtherance of our corporate interests and priorities.

Any use of our intellectual property rights without our permission is an infringement of our rights and could damage our intellectual property assets and reputation. It is equally important to ensure that we have the rights or permission to use any third party's intellectual property rights.

[CLICK HERE TO EXPLORE OUR INTELLECTUAL PROPERTY POLICIES](#)

## Confidential Information

As part of our Natura &Co, you are trusted with information that is confidential and/or proprietary to our business and our suppliers, affiliates, and partners, such as business plans and proposals, planned products and services, and other important business information.





We expect all colleagues to protect the confidentiality and integrity of all Natura &Co corporate information. You must not, under any circumstances, provide anyone undue access to information, tools, or resources under your responsibility.

The unauthorized disclosure of confidential or proprietary information carries significant risks for our company and may damage our reputation, relationships, and business functions. Natura &Co — and our colleagues individually — are subject to various legal obligations related to confidentiality. Breaches of these legal obligations potentially place our company, and our colleagues, at risk of legal sanctions.

[CLICK HERE TO EXPLORE OUR INSIDER TRADING POLICY](#)

## Financial Assets

Our business strives to operate efficiently and sustainably. Accordingly, we expect all colleagues to exercise care in managing, and drawing upon, our budget. We expect our employees to avoid unnecessary waste and unauthorized or excessive business expenses. The misuse of corporate resources, including for personal or third-party benefit, is a serious violation of our

policies and expectations — and may violate applicable legal prohibitions on theft, fraud, and embezzlement.

## Electronic Assets & Use of Third-Party Platforms

Our electronic systems and devices are valuable assets of our business and operations — and not personal property. Corporate systems and devices should not be used for unauthorized, inappropriate, or unlawful purposes.

Our policies do allow for limited personal use of certain electronic systems and devices. However, when using our systems and devices for personal purposes, all colleagues must remain fully compliant with all applicable policies and procedures and must ensure that such use does not distract from or negatively impact their work or corporate responsibilities.

To the extent that our colleagues consult third-party electronic resources or platforms — including artificial intelligence platforms such as "ChatGPT" — for either business or personal purposes, they must do so consistent with our confidentiality rules and intellectual property and other policies. It is a violation of confidentiality to share, post,

upload, or otherwise transmit to a third-party platform, resource, or service Natura &Co's confidential or proprietary information or trade secrets, including any personal data of employees, customers suppliers, affiliates, or partners.

# Material Non-Public Information & Buying and Selling Natura &Co Stock

Natura &Co is a public company, which means that our company — and our colleagues — have various legal obligations which are intended to ensure that our investors have access to relevant information about our operations and are treated fairly. Natura &Co has an Information Disclosure and Securities Trading policy, which all colleagues should review carefully and are expected to abide by. All colleagues must remain in full compliance with this policy.

As a Natura &Co colleague, you may be privy to certain non-public information about our business and operations, which might be deemed material to the value of our company and/or certain securities or financial instruments that our company has issued or are tied to the value or performance of the company. Using material non-public information to purchase or sell any interest in securities tied to the value of our company, including but not limited to our public shares, or to recommend or induce others to deal in the same, can constitute insider trading — a serious criminal offense.

[CLICK HERE TO EXPLORE OUR  
INFORMATION DISCLOSURE &  
SECURITIES TRADING POLICY](#)



# Conflicts of Interests

We have a commitment to ensuring that Natura Co's reputation for fair dealing is not undermined by actual or perceived conflicts of interest among our colleagues and third-party affiliates and agents, which might give rise to concerns about the independence, integrity, or judgment of our team members or business units.

Accordingly, Natura &Co has specific policies to prevent and manage conflicts of interest and appearances of the same. Our policies distinguish between two types of potential conflicts of interest:

→ **Actual Conflicts of Interest.**

An actual conflict may arise when a colleague's personal or financial interests are at odds with the company's interests, reasonably bringing into question the colleague's judgment, objectivity, and loyalty to the company.

→ **Appearance of a Conflict of Interest.**

Similarly, the appearance of a conflict of interest may arise when a colleague's personal or financial interests might be at odds with the company's interest in a manner which could represent, in the present moment or in the

foreseeable future, an actual conflict of interest bringing into question the colleague's judgment, objectivity, and loyalty regarding the company.

Managing actual and apparent conflicts is important to ensuring the integrity and reputation of our business — and to ensuring our continued compliance with applicable anti-corruption laws. Determining whether an actual or apparent conflict exists always requires the exercise of judgment. However, our policies delineate certain categories of potential conflicts and how they might arise, including:

- Conflicts involving financial interests;
- Conflicts involving personal relationships;
- Conflicts involving outside professional interests;
- Conflicts involving gifts from third parties;
- Conflicts involving travel and entertainment; and
- Conflicts involving the procurement process and our procurement colleagues.

As an example, under our policies, any gifts or anything else of value exchanged between Natura &Co

employees and our suppliers must not involve or appear to involve an expectation of receiving something in return or gaining improper influence over Natura &Co's business and must comply with our conflicts of interest and anti-corruption policies and applicable anti-corruption laws.

Importantly, this is not an exhaustive list. If you are concerned about an actual or apparent conflict of interest involving yourself, or one of your colleagues, please seek further information.

Our policies are aimed at ensuring that actual or apparent conflicts are promptly disclosed and appropriately managed. The existence of an actual or apparent conflict is not necessarily a violation of compliance policies — but a knowing failure to disclose a conflict of interest is always a violation of our policies.

[CLICK HERE TO EXPLORE OUR CONFLICTS OF INTEREST POLICY](#)

TO DISCLOSE A POTENTIAL CONFLICT OF INTEREST, complete the online form available at [Natura &Co Conflict of Interest Form](#).

# Anti-Corruption

Natura &Co has an absolute commitment to avoiding bribery and corruption. We believe such actions are harmful to the planet and our most vulnerable communities.

We have established robust anti-corruption policies and are committed to being fully compliant with applicable anti-corruption and anti-bribery laws across our global operations, including the Brazilian Clean Company Act, the U.S. Foreign Corrupt Practices Act (FCPA), and the UK Bribery Act.

In general, our policies and these laws prohibit the direct or indirect gifting, offering or acceptance of anything

of value provided to improperly influence a decision affecting the company. "Value" means any value to the individual, and therefore can include money, hospitality, or even our products or services.

Our Anti-Corruption Policy requires that our colleagues seek and obtain pre-approval from Ethics & Compliance before engaging in certain activities. Before engaging in any of the following, please consult the relevant policy and speak to the Ethics & Compliance team as necessary:

→ Interactions with government officials and entities;

- Charitable contributions and paying certain industry association fees;
- Third-party vendor engagements;
- Reseller transactions; or
- Mergers & acquisitions and new market entries.

[CLICK HERE TO EXPLORE OUR ANTI-CORRUPTION POLICY](#)

If you have any reason to believe that any action on behalf of Natura &Co is a potential violation of our Anti-Corruption policy, you must make a report to the Ethics Line or other reporting channel.

# Anti-Money Laundering

Natura &Co is committed to ensuring that our business is not involved or implicated in money laundering and that our company remains in full compliance with applicable local and international anti-money laundering (AML) laws. Money laundering is a serious civil and criminal offense.

We have various policies and procedures in place to monitor, identify, and remediate irregularities which might be related to money laundering — broadly understood as attempts to conceal the true source of unlawfully obtained funds or to otherwise "wash," or pass off as legitimate, unlawfully obtained funds.

Our policies and procedures have additional information about how each of us can ensure that we do not knowingly or unwittingly engage in money laundering.

# Antitrust & Fair Competition

Natura &Co is committed to conducting business and competing fairly, ethically and consistent with applicable competition and antitrust laws across the jurisdictions in which we operate.

Our Antitrust Policy aims to provide a unified global standard for our operations and to prevent the incidence of potentially unlawful anti-competitive practices within any of our business units.

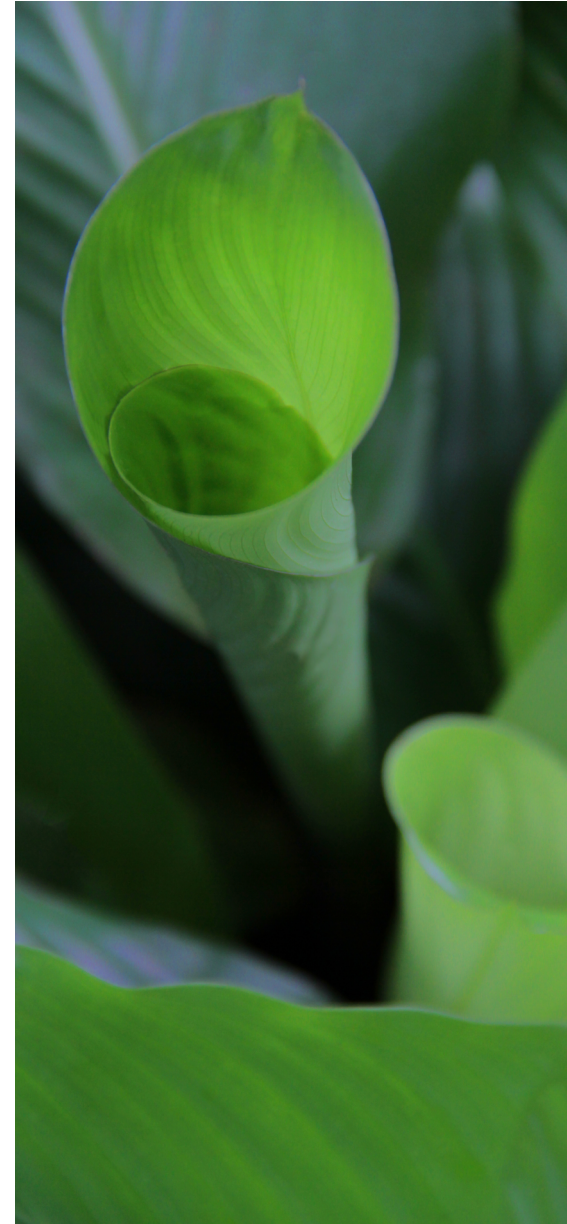
In general, our policies require our team members to refrain from:

- Sharing confidential information with our competitors;
- Agreeing to or engaging in, formally or informally, practices that prevent or restrain market competition, including but not limited to, agreements to collude, set prices or limit production, group boycotts, and agreements not to compete in defined areas or markets;
- Inducing customers, distributors, or franchisees to breach or otherwise repudiate contractual obligations entered into with competitors;

- Imposing or attempting to impose minimum or fixed resale prices for resellers of our products; or
- Restricting our customers' ability to ship and sell goods throughout the European Union.

Colleagues who are involved with the management or negotiation of commercial relationships with competitors, industry or trade associations, suppliers, distributors, franchisees or other third parties should seek advice from a Legal partner as necessary. You are required to know these rules.

[CLICK HERE TO EXPLORE OUR ANTITRUST POLICY](#)



# Books & Records

Our company is committed to maintaining accurate and timely records and remaining in full compliance with all applicable legal recordkeeping and accounting requirements across the jurisdictions in which we operate.

Each of our colleagues has a responsibility to accurately record, in

reasonable detail, any transactions or activities that have an actual or potential financial impact on our business or its assets and liabilities. Each of us is responsible for ensuring that every document they produce is truthful, accurate, and in compliance with internal policies and applicable laws. These values are reflected across our financial policies and procedures.

Natura &Co will not reimburse any expense incurred by an employee unless such expense is described in reasonable detail, supported by documentation such as a valid invoice or receipt, and does not otherwise violate the law or company policy.

# Taxes

We are committed to tax transparency and paying our taxes in the right amount and at the right time in accordance with applicable tax laws, and fulfilling our tax disclosure, reporting and compliance obligations in a timely and accurate manner. This approach is reflected clearly across our tax policies and procedures and tax governance framework, which includes engaging collaboratively with our stakeholders, including through an open dialogue with the tax authorities.

Our colleagues in the Tax, Legal, and Finance areas have a responsibility to ensure our adherence to these policies and procedures, as well as to engage in open debate with governmental agencies to develop fair and effective government tax policies.



# Trade Sanctions

We are committed to remaining fully compliant with national and international laws and sanctions restricting business or financial dealings with specific countries, entities, and individuals.

Our Trade Sanctions Policy is designed to ensure that our businesses remain compliant with the constantly evolving landscape of global trade and national security sanctions. Our policy lists specific entities, countries and individuals with whom (1) our business units are categorically restricted from dealing; and (2) our business units may only deal after receiving approval from our Ethics & Compliance team.

In addition to remaining in full compliance with these policies, our colleagues may never knowingly engage in activities that violate applicable trade laws or sanctions. You must recuse yourself from participating in any activity that could violate these laws.

[CLICK HERE TO EXPLORE OUR TRADE SANCTIONS POLICY](#)



# Privacy & Data Protection

Natura &Co is fully committed to the responsible collection, use, and care of personal data in accordance with the law and our ethical values and standards towards our colleagues, our Consultants and Representatives, and other customers. We believe our handling of personal data is critical to the protection of our brands.

We must all remember that privacy to individuals is the legal and fundamental human right to:

- Have control and notice over how their personal data is collected, processed and stored;
- Understand whether or how their data is used and shared with third parties; and
- Have their data amended, accessed or deleted.

Our Privacy and Data Protection Policy and program is tailored to ensure compliance with privacy principles and legal requirements across our businesses and jurisdictions.

We aim to ensure both due respect of individual privacy rights and compliance with legal obligations to prevent the misuse, exploitation, or mishandling of personal data and information. Core commitments reflected in our program include:

- Collecting and processing data lawfully, fairly and transparently;
- Only collecting and processing personal data to the extent necessary;
- Keeping personal data secure and confidential (especially sensitive personal data, including pay, financial or health information); and
- Taking reasonable steps to keep personal data up to date.

[CLICK HERE TO EXPLORE OUR PRIVACY & DATA PROTECTION POLICY](#)

**TO REPORT A PRIVACY INCIDENT,** please make a report using the Natura &Co Ethics Line.





# Information Security

Natura &Co is deeply committed to safeguarding the information entrusted to us.

Our commitment is reflected in the 10 Information Security Principles we have adopted under our Information Security Policy. All our colleagues are responsible for complying with the letter and spirit of these principles:

1. We take our responsibility for protecting data extremely seriously.
2. We all understand and embrace our responsibility to protect data and systems from abuse.
3. We take an active, risk-based, and proportionate approach to security, identifying, and protecting what matters the most.
4. We build security and resilience into the design of all our products and services, and use defence in depth, never relying on only one control to protect our systems.
5. We work with our suppliers and partners to meet the same high standards of security across the ecosystem of our business.
6. We manage access to data and systems, ensuring people only have the access they need to do their job.
7. We maintain our systems and processes to reduce vulnerability to attack.
8. We establish and maintain the ability to monitor our systems for signs of attack.
9. We prepare for, respond to, and recover from incidents quickly and effectively, with our customers' interests always at heart.
10. We comply with security regulations and laws in all jurisdictions in which we do business.

[CLICK HERE TO EXPLORE OUR INFORMATION SECURITY POLICY](#)

[TO REPORT A SECURITY INCIDENT,](#) please contact your line manager and notify your IT Service Desk.



# External Communications & Social Media

Our external communications and social media approach is designed to ensure that our colleagues remain true to our values and protect the integrity and reputation of our brands, while representing our company and while promoting and sharing our activities on social media.

Consistent with our guidelines, we encourage everyone at Natura &Co to engage with our published content on social media by liking, commenting, or sharing posts that inspire them.

We have implemented several specific policies aimed at ensuring that our

colleagues' social media and external communications do not damage our business, but each of our colleagues should always endeavour to use their best judgment in striving to maintain an online and external presence that is consistent with our brand and values.

Colleagues are not permitted to share any confidential information regarding Natura &Co on any social channels, including unannounced product launches, campaigns, assets, financial information, or customer details.

We also have zero tolerance for any public posts that could be deemed offensive or discriminatory. Each of our colleagues is individually responsible for the content of their public posts and online content, and any breach of these guidelines may result in disciplinary action, including dismissal.

Lastly, colleagues may not speak directly to journalists on behalf of Natura &Co without prior permission from their Corporate Relations team.



# Further Information

## IF YOU NEED MORE HELP

Please contact either your line manager, HR partner, Legal partner, or Ethics & Compliance partner.

## REPORTING MISCONDUCT

We believe, as a group, that everybody should feel safe to speak up through our Natura &Co Ethics Line and other reporting channels.



## QUICK LINKS

- To download our Intellectual Property policies [click here](#)
- To download our Insider Trading Policy [click here](#)
- To download our Information Disclosure and Securities Trading Policy [click here](#)
- To download our Conflicts of Interest Policy [click here](#)
- To download our Anti-Corruption Policy [click here](#)
- To download our Anti-Trust Policy [click here](#)
- To download our Market Intelligence Gathering & Information Exchange Guidelines [click here](#)
- To download our Trade Sanctions Policy [click here](#)
- To download our Privacy & Data Protection Policy [click here](#)
- To download our Information Security Policy [click here](#)

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# *Our Commitment* **to the Planet**

At Natura &Co, we know that a healthy environment and global ecosystem is essential to the health and well-being of people, including our customers, colleagues, and communities. We are constantly pursuing ways to reduce our environmental impact and help our suppliers, communities, and other third parties to do the same.

This section outlines some of our key environmental policies and commitments that we expect all our colleagues and partners to adhere to.

# Environmental Leadership & Stewardship

Natura &Co is focused on doing our part to lessen the global impact of climate change, as it pertains to both fundamental human rights to a safe and liveable world and to the protection and revitalization of our shared planet.

Our company has proudly committed to reduce our emissions to net-zero by 2050, as part of our broader efforts to support the global Paris Agreement goal of limiting global temperature increases to 1.5°C above pre-industrial levels.

This commitment begins with each of our colleagues and partners. All of us should continuously strive to proactively assess and reduce our carbon footprint and environmental impact. For instance, we expect our colleagues to promote and implement policies and practices aimed at regenerating natural ecosystems impacted by our operations, reducing our waste generation, energy usage and water consumption, and limiting the environmental impact of our formulas and packaging.

Beyond our commitment to environmental leadership and stewardship, we have an absolute expectation that each of our colleagues fully complies with all applicable environmental laws and regulations.



Natura became the world's first publicly listed company to achieve B Corp status in 2014. B Corp Certification is a designation that a business is meeting high standards of social and environmental performance, has made a legal commitment to be accountable to all stakeholders, not just shareholders, and is transparent in meeting these high standards. Being a B Corp is a way we signal to the world that we are serious when it comes to using our power in business as a force for good.

# Critical Supply Chain Policies

We are committed to responsible and sustainable business practices across our global supply chain. We recognize that some of our existing supply chain relies upon materials that may raise

social or environmental concerns. We have therefore committed to full traceability and/or certification for the supply of palm oil, cotton, paper, mica, alcohol and soy by the end of 2025.

To support this, we launched publicly available critical materials policies for suppliers to explain how our businesses utilize these resources, and specific traceability and certification requirements for individual materials to ensure responsible production.

All colleagues working with supply chain partners are expected to reinforce these policies with all parties and implement adequate checks to monitor our suppliers' practices and ensure compliance.

[CLICK HERE TO EXPLORE OUR CRITICAL SUPPLY CHAIN POLICIES](#)



# Further Information

## IF YOU NEED MORE HELP

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## REPORTING MISCONDUCT

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## QUICK LINKS

- To download our *Commitment to Life* [click here](#)
- To download our Critical Supply Chain Policies [click here](#)



**natura & co**