



Ethics and compliance

GRI 3-3

The Ethics and Compliance team is made up of 19 individuals working specifically in this area. The team is headed by the Deputy Compliance Officer, who, in turn, reports to the Chief Legal & Compliance Officer to monitor the effectiveness of the Compliance Program and compliance with the Anti-corruption Policy.

Our commitments to the Stakeholders and the unrestricted compliance with the legislation in effect in the regions where we operate are reflected in the Company's Global Code of Conduct. This publication, which was revised in 2024, guides the standards of behavior that are expected of our employees and members of the Board of Directors and is structured in the form of four commitments:

- **To our people:** our approach to the themes of diversity, equity and inclusion; health and safety at work; and anti-discrimination, harassment and violence.
- **To the communities:** this guides our work with the Beauty Consultants, representatives, distributors and franchisees, as well as our customers and suppliers. It also addresses philanthropic contributions and the prohibition of any donation of a political-party or electoral nature. **GRI 415-1**
- **To the planet:** this concerns how the Company manages the environment in its operations and those policies that are critical to the value chain.
- **To operating responsibly:** reinforce our ethical standards in the preservation of Natura &Co's assets; standardize the themes of conflicts of interest, tackling corruption and money laundering, anti-trust and fair competition, the regularity of the accounting books and records, commercial penalties, data privacy and protection, security of information, and external communications.

A specific set of policies and internal protocols complement the Code of Conduct and these are revised on an annual basis. The implementation of the Code of Conduct is supported by periodic evaluations of risk, continuous monitoring, training sessions and internal communications, as well as a stringent due diligence process.

We regularly report critical concerns to the highest governing body by means of reports, meetings, audits and updates by the senior management. In 2024, five environmental, social, economic and strategic topics were discussed by the Executive Committee once a fortnight.

Evaluation of risks of compliance and due diligence relating to suppliers GRI 205-1

Natura &Co undertakes an annual evaluation of the risks involved in all of its operations, analyzing matters concerning corruption, money laundering, competition, data privacy, and commercial penalties. In 2024, we evaluated four Latin American countries - Brazil, Chile, Colombia and Peru - and three markets in which Avon International operates - Romania, South Africa and Kazakhstan.

All the suppliers undergo a process of reputational and anti-corruption due diligence, both as part of the initial selection and once every two years, for those with current contracts. Following approval, these suppliers must adhere to the Suppliers' Code of Conduct, the



*Code of Conduct
certification process.*

*99% of the employees at
coordinator level or above
received training on our
Anti-corruption Policy.*

Privacy Statement, and the Responsible Procurement Guidelines. Depending upon the type of relationship with the supplier, they should also adhere to the Critical Materials Policies.

Those suppliers considered to be "critical" also receive continual support and training. In 2024, as part of this process, 798 Natura &Co Latin America suppliers and 570 Avon International suppliers were evaluated.



The only Brazilian company to be recognized by a program concerning exceptional compliance and a commitment to perform ethical business.



This is the fifth time that Natura has received this seal, awarded by a partnership between the Federal Comptroller General and the Ethos Institute in recognition of programs of excellence in integrity and the fight against corruption in Brazil.

Training and engagement

GRI 2-24, 205-2

Each year, the Ethics and Compliance, Culture, and Internal Communication teams draw up a Training and Communication Plan. These actions involve all the hierarchical levels within the Company, including the Board of Directors, and begin as soon as new employees join the Company, with recycling programs and training sessions that take into consideration the specific characteristics of the jobs performed.

In 2024, 4,326 employees of Avon International and 12,873 of Natura &Co Latin America successfully completed the Code of Conduct certification process. Compliance Weeks were conducted as a means of promoting ethical behavior, in Brazil, the United Kingdom, Turkey, Italy, South Africa, Malaysia and Morocco. Brazil also has a Compliance Ambassadors Program, designed to help spread the culture of ethics.

Other training sessions include those focused on the Anti-corruption Policy, Respect in the Workplace, Data Privacy, ethical dilemmas related to our Code of Conduct, the policies it references, and commercial penalties. The Emana Pay teams also receive training on the prevention of money laundering, interactions with government officials and regulations relating to Pix instant cash transactions.

Complaint hotlines and investigation processes

GRI 2-16, 2-25, 2-26, 205-1, 406-1

We promote an organizational culture that encourages the safe and accessible communication of issues related to ethics and compliance. Our Ethics and Compliance Program provides complaint hotlines for our employees and other stakeholders to raise any concerns they may have, settle doubts, or report suspected violations of Natura &Co's Code of Conduct or the law.

The Natura &Co Ethics Hotline is the reporting channel the company offers and is available to all our stakeholders. Operated by an independent third party, it ensures anonymity and is accessible by means of an online form or a free telephone call conducted in the official languages of the countries in which we have operations. The Ethics and Compliance team reviews all the accusations and questions received by the Ethics Hotline, which is also monitored by the Board of Directors. Retaliations against the accusers are not tolerated. All proven violations of the Code of Conduct result in the creation of an internal remediation committee, which is responsible for defining the disciplinary measures and preventive actions.

In 2024, Natura received 538 accusations and 141 conflict of interest disclosure forms. Twenty-eight of the reports were resolved with remediation measures. Seven cases considered to be critical were also reported in Brazil. Four of them were closed following the decision that they lacked grounds and three remain under investigation, with outside specialists having been contracted to investigate and make recommendations regarding the risks and fragility of the processes. At Avon International, 117 accusations were received as well as 30 conflict of interest disclosure forms. Five critical concerns were reported, covering environmental, social, human rights, economic and strategic sustainability matters

The effectiveness of our complaint hotlines is evaluated by means of an annual survey which also gauges the perception of our employees concerning ethical leadership. Under the terms of the Natura &Co Whistleblower Policy, the cases considered to be critical are regularly communicated to the highest governing body.

Conflict of interests

The Conflict of Interests Policy aims to prevent and mitigate any potential conflicts, be they real or apparent, between the interests of the conflict of interest and its employees. This issue is also addressed in the Global Code of Conduct.

We conduct internal training, including annual sessions on the Code of Conduct, as a means of raising our employees' awareness of the importance of preventing and declaring any potential conflicts of interest. We analyze the self-declarations and implement remediation plans within 45 days of their receipt. Should any conflicts be identified, mitigation measures are adopted, with the cases being duly registered on a specific platform.

For those cases that involve related-party transactions, there is a separate and specific policy, which is available on the Company's [website](#). It lays the foundations for an evaluation of the transaction by a Working Group made up of the Legal, Compliance, Risks and Internal Controls, and Controller departments. This norm includes the demands set forth by the Brazilian Securities Commission and the B3's Novo Mercado segment, in Brazil, where the Company's shares are listed.