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ORIFLAME  
SWEDEN

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# Message from the CEO

When you are an Oriflame employee, regardless of which country you work in or what your position is, the Code of Conduct applies to you. Together with our policies and guidelines, it sets out the framework that leads us to making the right choices at work – with a high level of integrity and a strong ethical and moral conscience. Therefore, all of us should feel a shared responsibility for the Code of Conduct. If you ever experience or encounter behaviour that jeopardises our Code, I count on you to speak up and help us fix it. If there are any specific situations not addressed by the Code of Conduct or the policies, we must always comply with the applicable laws.

This Code is part of our long-term commitment to becoming a truly sustainable company. We are reliable, open and transparent. We are proud of our ethics and values and we want to share them with the world.

We are as always working tirelessly to empower and support entrepreneurial people all over the world – our Brand Partners. Together with them, we form a global community. Every day we prove, that by working together, and learning from one another, we can

continuously improve in every aspect of our business. Constantly striving to conduct our business in a way that is respected and admired everywhere, is a core part of our spirit.

Yours sincerely,

**Anna Malmhake,**  
Chief Executive Officer and President



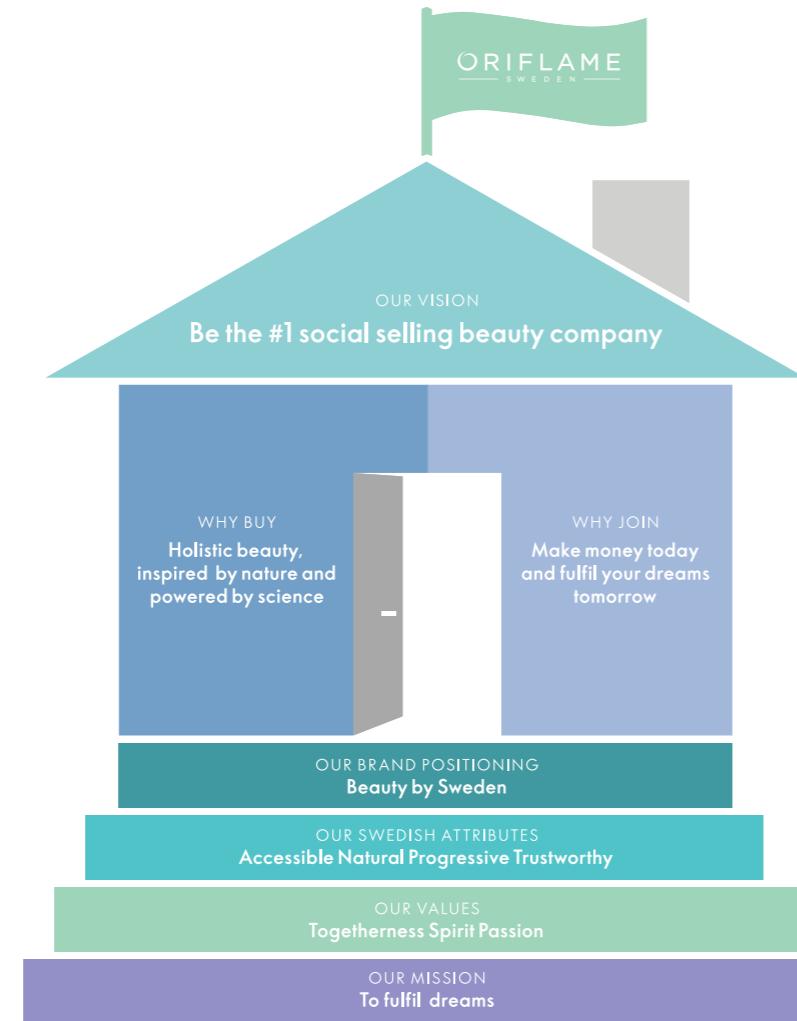
# The Oriflame house

Where we are going

What we offer

How we do things

Why we exist



# What is the Oriflame Code of Conduct?

When we do business, we always comply with the laws, regulations and policies established by governments and international institutions. We have an utmost respect for the rule of law and expect you as an Oriflaman to share this respect. But we are also going the extra mile. You should know that you work for a company that you can trust, where you can feel safe and comfortable. You work for a company that wants you to dream and helps make your dreams come true. Helping people fulfil their dreams is Oriflame's mission and our biggest commitment.

The Oriflame Code of Conduct is a manifestation of this commitment. It is a set of rules, a source of direction and an ethical framework to support you when making important decisions during your working life at Oriflame.

The Code applies to all Oriflame employees. If you witness or become aware of a possible violation of the Oriflame Code of Conduct, you must report it immediately, and take action if possible.

You can submit a report to your manager or to any manager. You can also email your concerns to [codeofconduct@oriflame.com](mailto:codeofconduct@oriflame.com), a mailbox owned by the Global Assurance team. We will treat it with respect and the utmost confidentiality. Oriflame will never discriminate against or punish any individual for reporting, in good faith, actual or suspected infringements. Confirmed breaches of the Code of Conduct are considered to be breaches of the conditions of employment and can therefore lead to disciplinary measures proportionate to the severity of the breach.

*"As part of our culture of trust – you should speak up if something isn't right, so we can address the problem."*

# Our 10 rules

**1** We provide a safe and secure workplace for all employees

#safeenvironment – A day you cannot miss

**2** We treat each other with respect and dignity

#giverespect – Unacceptable views

**3** We never tolerate corruption

#anticorruption – Customs clearance

**4** We use good judgement regarding entertainment and travel

#travelandentertainconsciously – A "thoughtful" gesture

**5** We maintain accurate financial records and comply with all disclosure standards

#financialintegrity – A suspicious invoice

**6** We protect our assets and respect privacy

#privacy – A photo from the internet

**7** We compete fairly

#competefairly – A price war

**8** We always act in the best interest of Oriflame

#avoidconflictinterest – Family ties

**9** Human rights and labour laws are indisputable

#equalrights – Request for promotion

**10** We strive to be a sustainable company

#sustainability

## 1. We provide a safe and secure workplace for all employees

**Health and safety always come first, and are extremely important for Oriflame**

We are committed to complying with local and national health and safety requirements at all times.

We encourage a healthy work culture for our employees, one that supports a sustainable work-life balance.

Our work locations are reviewed to eliminate potential safety and security risks for our employees and the people who work with us.

#safeenvironment

### A day you cannot miss



Gabriel woke up this morning with a terrible headache. He also started coughing and sneezing constantly. His thermometer provides no consolation either: it shows 39 °C. It's a shame, because Gabriel has several important meetings to attend today. He is afraid that his absence from work could impact his performance. Gabriel thinks he should swallow some pills and still go to work. Should he do it?



It's not a good idea to go to work when we're ill. A runny nose might be ok, but we do not encourage you to come to work with fever. It doesn't matter if you have meetings or pressing matters to attend. An employee who is ill may potentially pass the illness on to others by coughing and sneezing. This is why Gabriel should stay home and rest until he fully recovers. His meetings can be rescheduled, or he can attend them via the digital tools. If you start feeling ill during the day, consider leaving and going home early.

## 2. We treat each other with respect and dignity

### We are against any form of discrimination

We make sure that every single employee is afforded the same opportunities for personal and career development regardless of gender, ethnicity, nationality, age, sexual orientation, political or religious affiliation, or physical ability.

Our recruitment process focuses solely on finding the right person for the job, who is skilled for the position and has a cultural fit to the company. All the recruitment decisions are based on the performance, experience and potential of the candidate.

### We have zero tolerance for harassment

No form of physical, verbal or non-verbal abuse, bullying, inappropriate comments, harassment or any other form of hostile conduct towards anyone is ever accepted, in or outside the workplace.

### Office politics

For us, conspiring behind a person's back is equal to harassment. If arguments arise, they should be handled in an open and respectable way, and always face-to-face. No form of office politics is acceptable.

#giverespect

## 3. We never tolerate corruption

### Unacceptable views



Usman's team has a new manager. This person is a highly skilled professional, who has a lot of experience both of IT and team management. However, Usman recently overheard this person making racist comments on the phone about Usman and his colleagues. Usman is offended and thinks the racist comments actually constitute a breach of the Code of Conduct. But Usman is worried that his career could be at risk if he confronts the new manager. What should he do?



Usman is absolutely right to be angry. No one is above the Code of Conduct. If Usman wants to act, he can report the incident to [codeofconduct@oriflame.com](mailto:codeofconduct@oriflame.com).

The Global Assurance team will launch an investigation and determine what disciplinary actions are to be taken against the manager.

Employees of Oriflame are not permitted to give or offer, receive or solicit anything of value for the purpose of obtaining or retaining a business advantage.

As an example, this could be, but is not limited to, cash, gifts to family members, forgiveness of debts, loans, entertainment, meals and travel, political and charitable contributions, business opportunities and medical care.

#anticorruption



Whatever the amount of money and however quickly you want things to move, bribery is never the solution. Corruption and bribery are never permitted by Oriflame. Do not offer or accept bribes of any kind.

The laws in some countries impose large penalties for bribing government officials. For us, it's simple: bribery – of anyone, at any organisation, at any level – is always wrong.

## 4. We use good judgement regarding entertainment and travel

When travelling abroad for Oriflame, employees are expected to be ethical role models. All actions should tolerate full transparency. This means that you should not put yourself in any situation that could harm the reputation of Oriflame.

Gifts may never be given, offered, solicited or received with the intent or prospect of influencing the recipient's business decision-making. In accordance with the **Oriflame Global Representation Policy**, any lawful gift, hospitality, entertainment, or other representation item of a nominal value must be approved in advance by the regional or group functional VP Finance, or alternatively by the Corporate Committee or Chief Financial Officer if VP Finance is involved.

Employees may accept and keep gifts if their value is in accordance with accepted business practice and Oriflame policies, and as long as those gifts cannot be seen as improperly influencing the employee's business judgment or appear to place them under obligation to perform, or not perform, certain actions.

#travelandentertainconsciously

### A "thoughtful" gesture



Victoria is a long-time employee of Oriflame and throughout her career in Sales she has supported many Brand Partners and Leaders. As a sign of gratitude, they sometimes give her a small gift – such as a box of chocolate. But this time, some Brand Partners got together and offer her a more substantial thank you – a week at a resort for Victoria and her family. It's been a long time since Victoria took a proper holiday, but she is also sceptical about the appropriateness of this gift and afraid accepting it could compromise her integrity. What should Victoria do?



It's absolutely OK for employees to receive small gifts from Brand Partners, colleagues and business partners, if the value of the gifts is in accordance with accepted business practice and Oriflame policies. However, more substantial gifts can be considered a bribe. The correct response to these situations is to politely refuse the gift. In some regions it is customary and even necessary to exchange gifts before doing business. If this applies to your region, you should consult your manager and local Finance department before making any decisions.



## 5. We maintain accurate financial records and comply with all disclosure standards

We must ensure that we follow all applicable standards, principles, laws and practices for accounting and financial reporting. As employees we must also ensure that no part of any payment is to be made for any purpose other than what is fully and accurately described in Oriflame's books and records.

No undisclosed or unrecorded accounts are to be established for any purpose. False or artificial entries are not to be made in Oriflame's books and records for any reason. Personal funds must not be used, and cannot be claimed as expenses, if a bill or invoice is questionable in nature.

#financialintegrity

### A suspicious invoice



As part of her weekly Friday afternoon routine, Nadezhda is signing the payments booked by accountants. There is an invoice for office cleaning services from the company Cleanplus for the last month. The invoice has been approved by the office manager. But Nadezhda remembers that she already signed a payment last week for a company with a similar name – Cleantop – for that very same service and period. The office manager has signed this invoice, so it should be OK to just pass it on and besides, Nadezhda has called the office manager so many times this week already. She doesn't want people to think she is incompetent! Should she investigate this invoice or let it pass?



In the end, Nadezhda decided to call the office manager and ask about this invoice. After checking the books together, they found that the company called Cleanplus did not even exist – it was a fraud attempt by one of Cleantop's employees.

Keeping careful records is not just a legal requirement – as you can see, it can also protect our company from harm or unlawful behaviour.

When in doubt – spend some extra time to go back and check that everything is approved and in line with our contracts, agreements and legal requirements. Better safe than sorry.

# 6. We protect our assets and respect privacy

It is our responsibility to ensure that the company's IT systems are used efficiently, ethically and lawfully, and that they are used only for business or related activities. Likewise, physical assets such as laptops – and the information they contain – must always be treated with care. Laptops and storage devices should therefore never be left unsecured. Our **Confidentiality and Information Protection Policy** outlines more detailed requirements.

To ensure compliance, and protect the interests of Oriflame, our customers and others, Oriflame has the right to access, and when necessary disclose, records of how employees have used the company's systems and data to the extent that this is allowed by local legislation. Everyone at Oriflame is legally required to comply with all copyright laws and proprietary software-licence agreements.

We respect the privacy rights of any person whose personal data is processed by us at Oriflame. We handle personal data responsibly and in compliance with all applicable privacy laws. Processing of personal data is always done fairly, lawfully and transparently. Preserving the trust of our customers requires that each employee takes measures to protect the personal data they have access to.

We always consider data protection principles at the design phase of any new service or product and throughout their lifecycle. We know and understand our responsibilities in relation to the personal data we hold of employees and Brand Partners.

#privacy

## A photo from the Internet



Louis is the newest addition to the Creative Studio in Stockholm. His first task is to create a poster featuring new Oriflame products. After spending some time with the concept, he decides it would be cool to feature real people on the poster, instead of the ones from stock photos. He goes to Facebook and finds some nice photos of his friends. However, Louis hesitates to use them. What if they protest? What if there are legal issues? Should Louis put his friends on the poster?



At Oriflame we value the privacy and intellectual property of other people. In this case, Louis should consult his manager before making any decisions. If the manager approves this creative choice, Louis should still ask his friends for their approval and have them sign a special consent form.

You can learn more about these situations on the Global Assurance page/Data Protection Hub on Together.net.



## 7. We compete fairly

At Oriflame, we conduct business in accordance with all applicable antitrust/competition laws. This applies to all Oriflame employees.

These laws prohibit agreements, deals or understandings between competitors that may restrict competition (agreements on price, markets or customers, price discrimination and so on).

It is important that all Oriflame employees know that they cannot talk business with employees of Oriflame's competitors, unless they are specifically authorised to do so.

#competefairly

### A price war



Elizabeth is attending a seminar about a new tax law that is being given by an auditing company. The person next to her introduces himself as John and it turns out that he is also a finance director with another direct-selling beauty company. After a while, he starts talking to Elizabeth about the cosmetics business and complains about the price war going on in their market at the moment. This is a perfect opportunity to push John to reveal the competitor's true intentions. Elizabeth is good at this kind of game. However, if she starts talking to him about the price war, somebody may see them, and she knows she shouldn't be involved in that. Maybe it's better to just get up and move to another seat?



A few weeks later Elizabeth reads an article about the seminar in a business magazine. After an anonymous report, the local trade authority has launched an investigation into illegal market practices involving price fixing. The competitor company where John works is involved. Luckily, Elizabeth refused to talk to him and changed her seat, so Oriflame is not caught up in that. We must always remember that we are Oriflame's ambassadors and everything we do in our professional lives can affect our company. As this case shows, sometimes it's best to let the juicy business opportunity pass in order to comply with the law.

## 8. We always act in the best interest of Oriflame

It is a conflict of interest for an Oriflame employee to engage in business on behalf of Oriflame with any firm that is owned, managed, or employs a close relative or friend. It is also considered a conflict of interest to have a financial interest in any firm that does or seeks to do business with Oriflame or is a competitor of Oriflame. Oriflame employees and their relatives and partners may not join as Oriflame Leaders (Brand Partners managing other Brand Partners) unless stated otherwise for a specific country.

### Family ties



Mariana works in the Marketing department in one of our Latin American markets. She is in charge of supervising the local advertising campaigns and she and her colleague are busy evaluating offers from external ad agencies. One of the offers is from a company called Alonso Advertising and it clearly outperforms all the others. Interestingly, the last name of Mariana's colleague is also Alonso – so she asks him if there is any relation to the ad agency. The colleague reveals that the ad agency actually belongs to his sister. So what should Mariana do about this offer?

Oriflame employees' relatives and partners are allowed to be hired to work at Oriflame under certain conditions: the Oriflame employee's title is not VP and up; the employee is not involved in the recruitment process; the position is not in the employee's department or under the management of the employee.

Employees must disclose any such interest or relationship. If a case of conflict of interest occurs, the employee must remove themselves from the decision-making process related to the situation.

#avoidconflictinterest



The colleague should have told Mariana about his relationship to the ad agency before the selection process, so someone neutral could have participated in the decision-making process regarding the offers. Now this creates a conflict of interest and carries a number of risks for the company, and those risks must be avoided whenever possible.

As a consequence, Mariana eliminates this offer from the tender procedure.

# 9. Human rights and labour laws are indisputable

## We believe in diversity and equality

We offer equal career and development opportunities and promote a company culture that is inclusive and embraces the diversity of our employees. We strive for an equal distribution of men and women in all our management teams globally. We give all employees the same opportunities for promotion. We work actively to ensure equal pay for equal work and performance, benchmarked against external market data. We strive for equal representation of people with different backgrounds and broad experiences on our board, in our management teams and our workforce.

## Everyone's responsibility

We are all responsible for ensuring that our decisions, ways of working and behaviour ensure equality and do not discriminate. Managers in Oriflame are required to follow these principles in their day-to-day

management of team members and to investigate and deal with potential cases of discrimination in a decisive and urgent manner.

## We believe in an open environment and fair treatment

All employees have the right to freedom of association; this means that Oriflame employees always have the right to join or not join unions and also the right to collective bargaining. We are committed to respecting all applicable labour laws and regulations, including minimum-wage rates and working-hour requirements, and we never employ staff below the national minimum age for employment. We strictly oppose all forms of forced labour and child labour as well as other forms of exploitation.

#equalrights

## Request for a promotion



Jake has worked at Oriflame for some time now and has made significant progress. He is ready to take on more responsibility and climb the next step on the career ladder. However, his manager doesn't want to promote him and doesn't give Jake any explanation about why not. What should Jake do?



At Oriflame we believe in equal opportunities for career development, so Jake's manager's behaviour is questionable. If there are reasons why Jake should not be promoted, he deserves to hear them. If Jake's manager continues to dodge the question, Jake should contact his manager's manager and his local Employee Experience department. If the matter is not solved and there is a suspicion of unethical behaviour, [codeofconduct@oriflame.com](mailto:codeofconduct@oriflame.com) should be used to report it.



# 10. We strive to be a sustainable company

We respect our planet and nature and try to conduct our business without harming them. We also have a long-term vision to become a 100% sustainable company. Our long-term commitment is also echoed through our Swedish brand attributes and our focus on using ingredients from nature. We have a determination to increase our positive impact while reducing any negatives. This has led us to our sustainability strategy's three core areas: Opportunities for Brand Partners, Respect for Nature and Passion for People.

## Opportunities for Brand Partners

Our business reaches more than three million Brand Partners every year, giving us a truly unique opportunity to touch lives. Social selling gives people a real opportunity to earn an income within a more flexible framework than traditional employment, and combine it with childcare, studies or working from home. One of the most important advantages is the flexibility and freedom that our Brand Partners get from the business opportunity.

## Respect for Nature

For more than a decade we have been systematically trying to reduce our impact on nature. Respecting nature starts by truly valuing its contribution. This includes valuing the services nature provides, such as clean air and water, a stable climate, fertile soil and vibrant wildlife. We want to make our business completely environmentally sustainable. Of course, we are already on the path towards sustainability, and are always finding new ways to accelerate towards it.

In practice, this means:

- Preventing deforestation
- Avoiding the pollution of air, land and waterways
- Decarbonising our demand for energy, fuel and ingredients
- Safeguarding animal welfare
- Driving demand for environmentally responsible products both in terms of the formulations and materials we use and the packaging we choose.

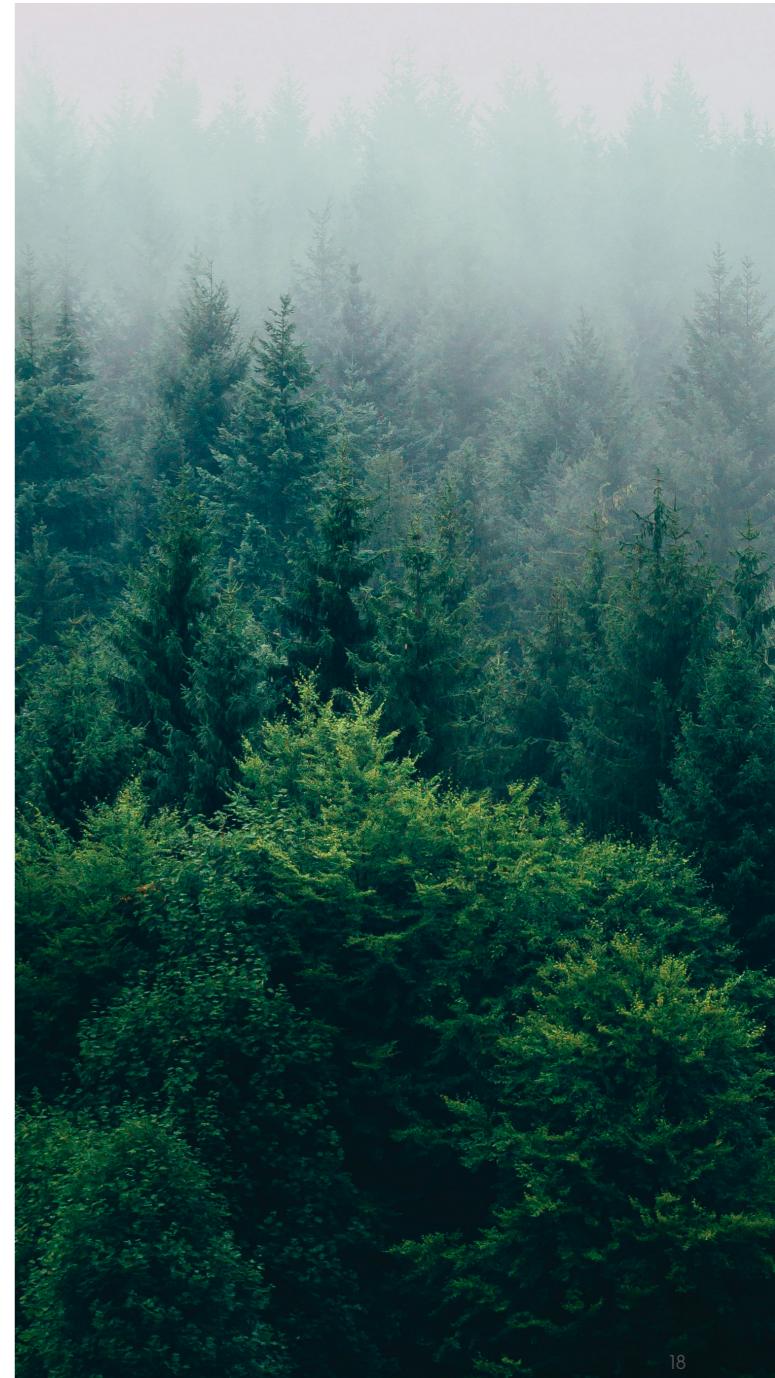
## Passion for People

Social responsibility is important to Oriflame because of the impact and potential influence we have on people around the world. Our business touches millions of lives every day, through our employees, suppliers, Independent Oriflame Brand Partners, customers and the communities where we operate.

Our commitment to social sustainability is an ongoing one. As a company we address issues such as human rights, consumer safety, diversity and inclusion, anti-corruption, and employee health and safety.

Oriflame's approach to human rights is based on the UN Guiding Principles on Business and Human Rights and applies to all entities within Oriflame.

#sustainability



# Code of Conduct for suppliers

We believe that corporations have the same social and ethical responsibilities as individuals. Therefore, our suppliers must adopt Oriflame's Supplier Code of Conduct, a policy that covers internationally recognised standards and the basic requirements related to human rights, labour, environment and anti-corruption. We strive to never do business with anyone who is suspected of violating any of the laws and ethical principles we value.



# Code of Conduct for Brand Partners

We are partners with our Brand Partners and they are key players in building Oriflame's reputation. Their actions don't just influence the company – they influence the direct-selling industry as a whole. Every Brand Partner who joins us vows to adhere to Oriflame's Code of Ethics and Rules of Conduct. Our Brand Partners must always treat people fairly. This means always communicating our products, their role as a Brand Partner and the Oriflame business opportunity in a highly professional and truthful manner.

Brand Partners must never exaggerate earning expectations, make untruthful product claims, identify themselves as an Oriflame employee or act as the Oriflame company itself.



# We play by the rules

## Policies

The Code of Conduct is supported by a number of group policies that contain further detailed requirements. These group policies apply to all employees and you are therefore required to know them. Some of these policies are listed below. You can access the full list on the dedicated Togethernet page.

- Communication Policy
- Confidentiality and Information Protection Policy
- Data Protection Policy
- Security and Occupational Health and Safety Policy
- Source to Pay Policy
- Global Representation Policy
- Hiring Policy
- Delegation of Authority Policy
- Group Finance Manual

At Oriflame, we stand behind the eight conventions considered to be fundamental principles and rights at work: freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation.

# Togethernet

All Oriflame employees are granted access to our Togethernet. This is an internal network designed to help employees with their daily activities. There you can find information relevant to your role and position, browse company news, participate in social networking and even publish something for everyone in the company to see! Our Code of Conduct, Policies, Guidelines, Procedures and other documents, can also be found in Togethernet and you can access them for reference at any time.

As always, when using Togethernet we want you to be ethical, professional and respectful. We want it to feel like home for everyone who works at Oriflame!

For more information, visit Togethernet at:  
[T2.oriflame.com](http://T2.oriflame.com)

## Togethernet

