

CODE OF CONDUCT

March 2025

of

**MLC Black Forest GmbH, ADA Cosmetics International GmbH
and all its associated companies**

(together called “ADA Cosmetics”)

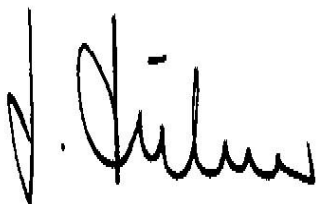
The reputation of our association and of the entire ADA Group as well as the confidence of our business partners, our staff and the public all depend on the specific conduct of each ADA Employee. It is up to every individual to play a part in ensuring that the positive expectations associated with the ADA name are met. Our Code of Conduct is therefore a binding set of guidelines intended to provide a reliable source of guidance in day-to-day dealings, laying down the legal and ethical demands towards all ADA Employees.

Whoever violates this Code of Conduct harms the reputation of ADA, potentially causing serious economic damage to us.

The following rules apply to all of us. The Management Committee of ADA Cosmetics abides by these principles in the same manner expected of all other ADA personnel. We are confident and put full trust in every ADA Employee to embrace this Code of Conduct and to play an active role in fully implementing it.

These rules, by way of establishing our human rights expectations towards them, also extend to Third parties representing ADA (such as agents, sales representatives, distributors, consultants).

We want to thank you for your support and contribution towards ADA's long-term success.



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Lutz Hübner

CEO, ADA Cosmetics

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I. Scope of application

This Code of Conduct applies to MLC Black Forest GmbH and ADA Cosmetics International GmbH, as well as to all ADA Cosmetics companies within the meaning of §§ 15 et seq. AktG [German Law on Public Companies] (hereinafter together called “ADA”). It applies worldwide to all ADA Employees, including Management Committee, directors and executives (hereinafter “ADA Employees”). For third persons acting on behalf of ADA (e.g., agents, consultants, distributors and contractors), it lays down the human rights expectations we have towards them as to their (Business) Conduct.

II. Vision and mission statement

ADA Cosmetics is constantly endeavouring to provide top quality to its customers and to satisfy the demands of both, the market and public in general, whilst fulfilling its responsibility for staff and consumer safety. ADA Cosmetics makes every effort to ensure the occupational safety of all jobs within the group and to protect ADA Employees from risks. Occupational safety, health care and health protection are integral part of company policy and are constantly subject to improvement.

The chief criteria when selecting suppliers, service providers and other third parties are their performance and quality awareness. ADA Cosmetics expects its service providers, other third parties and all external stakeholders to apply the same high standards as those put forward in this Code of Conduct. ADA Cosmetics has issued a separate Supplier Code of Conduct & Ethics for its whole supply chain partners.

ADA Cosmetics consequently promotes fundamental values such as human rights, employment standards, environmental protection and the zero tolerance for corruption within its sphere of influence.

III. Compliance with the law

ADA Cosmetics sets a high standard of integrity in their dealings. ADA Cosmetics and ADA Employees are obliged to observe relevant legislation. This includes, along with anti-trust and competition law, rules addressing bribery, illegal money transfers and corruption as well as relevant provisions governing protection of employment and data, plus environmental rules. The principle of compliance with the law expressly applies even if ADA Cosmetics would sustain a supposed advantage because of breaches of legislation. Every ADA Employee is compelled to familiarize himself/herself with the regulations applicable in his/her area of work.

If any of the provisions contained in this Code of Conduct are less restrictive than those in the local legislation, the spirit and contents of the local legislation shall prevail. Similarly, if any provisions contained in this Code of Conduct is contrary to any local legislation, regulation or ordinance, the local legislation, regulation, or ordinance shall be complied and adhered with.

IV. Protection of human rights

In line with the United Nations Guiding Principles on Business and Human Rights, ADA Cosmetics commits itself to uphold the principles of the following internationally recognized human rights frameworks and standards:

- The basic principles of human rights, as laid down in the International Bill of Human Rights (The United Nations Universal Declaration of Human Rights, The United Nations International Covenant on Economic, Social and Cultural Rights, The United Nations International Covenant on Civil and Political Rights)
- The eight Fundamental Conventions of the International Labor Organization (ILO)
- The International Labour Organization Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration)
- The United Nations Guiding Principles on Business and Human Rights (UNGP)
- The OECD Guidelines for Multinational Enterprises (OECD Guidelines)

This also includes laws in relation to employment, human rights, the environment, as well as health and safety.

Where country-specific laws and above listed, international human rights standards differ, we shall endeavour to follow the higher standard; where they are in conflict, we must seek to respect internationally recognized human rights to the greatest extent possible.

ADA Cosmetics has issued a Human Rights Policy Statement, which is available at this link: <https://ada-cosmetics.com/strategic-sustainability/transparency/>

ADA Cosmetics is also supporting the Ten Principles of the United Nations Global Compact (UNGC) on human rights, labour, environment, and anti-corruption. We are committed to making the UN Global Compact and its principles part of the strategy, culture, and day-to-day operations of our Company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. You can find our commitment on the UNGC webpage:

<https://unglobalcompact.org/what-is-gc/participants/161750-ADA-Cosmetics-International-GmbH>

V. Environmental responsibility

ADA Cosmetics supports a precautionary approach to environmental challenges, and, within its sphere of influence, undertakes initiatives to promote greater environmental responsibility and encourages the development and diffusion of environmentally friendly technologies & practices, avoiding or reducing negative environmental impacts.

ADA Cosmetics has committed itself to source responsible Palm Oil, Palm Kernel Oil and palm oil derivatives and has become a RSPO (Round Table for Sustainable Palm Oil) member in 2019.

ADA Cosmetics adheres to the European Union cosmetics REGULATION (EC) No 1223/2009 and does not perform animal testing for cosmetic purposes, neither for our finished products nor the ingredients used for the products, unless this is mandatory by law. We require our suppliers to state the same.

We are committed to the protection of the environment and the prevention of pollution:

- ADA Cosmetics is striving to continuously improve its environmental performance. It has strong and effective environmental management systems in place: ADA Cosmetics is living up to its ecological responsibility and goes beyond legal compliance by having ISO 14001 certification at site level.
- We work with high quality certification labels/ organizations such as Cradle to Cradle, to address and reduce water pollution that has an impact on aquatic life.
- We are reducing energy and water consumption.
- We are striving to increase our recycled material share in our packaging whenever possible.
- We are working on innovative packaging to reduce our global impact on the environment, always favouring the circular economy.

We use the 5R Strategy to manage waste and promote sustainability by prioritizing actions to reduce environmental impact: **Refuse, Reduce, Reuse, Repurpose, Recycle**.

At ADA Cosmetics, we embed the 5R strategy into every aspect of our operations, allowing circularity principles to naturally guide our products and processes. This commitment to sustainability has become a core element of our business strategy, reflecting our awareness of our impact on society and the environment.

We take full responsibility for this impact, setting ambitious targets to continually reduce our environmental footprint and enhance our positive contributions to society

For more details on ADA Cosmetics' environmental commitments, please see our Environmental Policy, available at this link:

<https://ada-cosmetics.com/strategic-sustainability/transparency/>

VI. Employment practices

ADA Cosmetics provides an adequate & fair remuneration for its employees and warrants to pay the appropriate statutory minimum wage at least.

ADA Cosmetics supports the effective elimination of all forms of compulsory labour and child labour as defined by the ILO.

By law, all genders must get equal pay for doing 'equal work' (work that equal pay law classes as the same, similar, equivalent or of equal value). This means someone must not get less pay compared to someone with a different gender doing equal work for the same employer.

All ADA Employees are hired with employment contracts as per local law and in a language they understand.

ADA Cosmetics does not charge any employees for recruitment costs whether they are successful or not.

Characteristics of an individual will not be the basis of decisions regarding any employment decision for hiring, job assignment, bonus, allowance, compensation, and discipline, and that these decisions shall be based solely on, and discipline shall be made solely based on education, training, and demonstrated skills or abilities.

VII. Freedom of Association and Collective Bargaining

ADA Employees, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively in the sense of ILO Conventions No. 87 on Freedom of Association and No. 98 on the Right to Organize and Collective Bargaining. ADA Cosmetics does not interfere with, obstruct, or prevent such legitimate activities. ADA Cosmetics does not discriminate against or otherwise penalize worker representatives or trade union members because of their membership in or affiliation with a trade union or their legitimate trade union activity.

All ADA Employees shall adopt an open attitude towards the activities of trade unions and their organizational activities. ADA Cosmetics gives internal worker representatives access to the workplace to carry out their representative functions.

VIII. Forced Labour

ADA Cosmetics does not practice forced, compulsory or trafficked labour. Forced or compulsory labour is understood as any type of work or provision of services which is requested by a person under threat of punishment and for which the person did not voluntarily make themselves available. Labor trafficking is the exploitation of an individual for financial gain. It involves the use of force, fraud, or coercion to compel a person to provide labour or services against their will.

All work must be conducted on a 'paid' and voluntary basis, and not under threat of any penalty or sanctions. The use of forced or compulsory or unpaid labour in all its forms, including prison labour and unpaid overtime work, is prohibited.

ADA Employees are not required to make deposits or financial guarantees. Identity documents of any worker (such as passports, identity cards, etc.) will not be confiscated.

No abusive delayed payment of wages shall occur.

The right of ADA Employees to terminate their employment after legal notice shall be respected.

The right of ADA Employees to leave the workplace and factory after their shift shall be respected.

IX. Child Labour

Children have a right to protection against abuse or neglect. ADA Cosmetics supports the extra protection of children and does not tolerate child labour. According to the ILO Convention C138, the minimum age for children is 15 years old, as far as the child is no longer in compulsory schooling.

ADA Cosmetics ensures that young employees under 18 years of age do not work overtime or night shifts and are protected against working conditions that harm their health, safety, morale, or development.

X. Modern Slavery

Modern Slavery is when an individual is exploited by others, for personal or commercial gain. They could be tricked, coerced, or forced and lose their freedom.

Since ADA Cosmetics is present in many countries, we are committed to respecting and promoting all internationally recognized standards of human rights for those that work for us as well as those that are part of our supply chains all over the world, while aiming to keep up social standards.

By way of an introduced due diligence process, we follow the recommendations of the OECD-Guidelines which can help us identify, prevent, and mitigate adverse impacts related to work human rights, the environment, bribery, and consumers, and we observe corporate governance principles that may be associated with our operations, supply chains and other business relationships.

ADA Cosmetics continues to work hard to raise awareness of this very important topic, by preparing Modern Slavery training for staff, in turn this will allow our workforce to be prepared should they notice any wrongdoing. We offer specialist advice and help line telephone numbers in all our entities around the world. We also provide an anonymous external whistleblowing platform which will allow the reporter to contact our local and head office compliance officers. It is everyone's responsibility to protect each other, should any employee or other stakeholder need to make a complaint please scan the QR code below for instructions:



XI. Working hours

Working hours must comply with national and local laws, collective agreements, and the provisions below, whichever affords greater protection for our employees.

If there are no legal requirements or minimum standards, the international standard of the ILO shall apply.

Working hours, excluding overtime, shall be defined by contract, voluntary and shall not exceed 48 hours per week (International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced), with a rest period of at least 24 consecutive hours every seven days shall apply.

All overtime shall be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual workers and the workforce.

Working hours may exceed 48 hours in any 7-day period only in exceptional circumstances where all the following provisions are met:

- This is allowed by national and local law.
- This is allowed by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce.
- Appropriate safeguards are taken to protect the workers' health and safety; and
- It can be demonstrated that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.
- Workers will not be penalized if they cannot complete the hours required above for personal reasons.

XII. Wages and Benefits

All ADA Employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time that they are paid.

They are compensated by the one-time payment of wages, remuneration, time off for overtime worked, or other health and wellbeing activities. We offer other legally required benefits and paid leave, meeting or exceeding legal minimum and/or collective agreements, whichever is higher.

Deductions from wages as a disciplinary measure are not permitted and no deductions from wages not provided for by national law may be permitted. All disciplinary measures are recorded.

We offer flexible working hours and work-from-home models to ADA Employees whose positions and culture permit it, helping our employees juggle work duties with the demands of their private lives.

By the end of 2025, we commit to evaluating whether our employees receive a living wage (that covers the necessities for life as defined in its local context- e.g., food, water, housing, health care, education, clothing, transportation, childcare, discretionary income). Our goal is to identify gaps per country and to build a five-year plan to make sure 100% of our employees are paid a living wage by end of 2030.

XIII. Equal opportunity and ban on discrimination

ADA Cosmetics does not tolerate discrimination in employment including recruitment, hiring, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination or retirement on the basis of gender, age, religion, marital status, race, caste, social background, diseases, disability, pregnancy, ethnic and national origin, nationality, membership in worker organizations including unions, political affiliation, sexual orientation or any other personal characteristics.

ADA Cosmetics advocates the equal opportunity and gender equality of its employees, irrespective of their skin colour, ethnic origin, nationality, social background, disability, sexual orientation, gender identity, marital status, political or religious beliefs, sex, or age.

We refrain from all forms of discrimination of employees, be it in the selection of the staff, in personnel management or in the career development of the staff and respects the right of employees to get involved in an employee representative committee and/or join trade unions.

XIV. Harassment

ADA Cosmetics has zero tolerance to any form of Harassment or Bullying. If we consider that harassment or bullying has occurred, prompt action will be taken to address it.

Where the harasser or bully is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure.

Harassment is any form of- or threat of- physical violence, including slaps, pushes or other forms of physical contact to maintain labour discipline is not utilized.

Harassment is any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, to maintain labour discipline is not utilized.

Harassment is unwanted physical, verbal, or non-verbal conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

We are committed to providing a working environment free from sexual harassment and ensuring all staff are treated, and treat others, with dignity and respect. We recognize that sexual harassment can occur both in and outside the workplace, such as on business trips, or at work-related events or social functions, or on social media.

Sexual harassment or victimization of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. The law requires employers to take reasonable steps to prevent sexual harassment of their staff during the course of their employment. We will take active steps to help prevent the sexual harassment and victimization of all staff. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support. Sexual harassment can result in legal liability for both the business and the perpetrator, whether they work for us or are a third party outside of our control. Sexual harassment and victimization may result in disciplinary action up to and including dismissal.

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined, or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

XV. Diversity, Equity & Inclusion

ADA Cosmetics follows strict guidelines to ensure fair treatment and opportunity for all our employees and potential employees. ADA Cosmetics aims to eradicate prejudice and discrimination based on an individual's protected characteristics. For more details on ADA Cosmetics' ethics commitments, please see our Diversity, Equity and Inclusion policy, available at this link: <https://ada-cosmetics.com/strategic-sustainability/transparency/>

XVI. Recognizing, Respecting and Upholding Human Rights and the Rights of Communities

ADA Cosmetics respects the Universal Declaration of Human Rights and acknowledges indigenous and rural communities legal, customary or user rights to their territories, land, and resources. We request that ADA Employees and our stakeholders acknowledge the right of Indigenous People and rural communities to give or withhold their Free, Prior, and Informed Consent (FPIC) before new logging rights are allocated or plantations are developed. We respect also the Free, Prior, and Informed Consent (FPIC) in the Palm Oil Supply chain.

XVII. Career Management

Career management is an active process that ADA Cosmetics takes in planning the future career of its employees through structured plans and short- and long-term goals, reviewed during their Career development reviews regularly. During our career management process ADA Cosmetics will review all desired positions for development with rewards given such as promotions, financial compensation, and other benefits. All employees are considered for this program and are free from any form of discrimination.

XVIII. Health and Safety

ADA Cosmetics follows safe work practices and observes all health and safety regulations applicable to its work, including official regulations, operational and system-specific safety regulations, and contractual requirements.

ADA Cosmetics is entirely responsible for the health, safety, and continued training of its employees. Regular Health & Safety training is provided to all employees, and all newly hired employees take part in an awareness-raising training course related to Health & Safety.

Regular training of workers and management in waste management, handling and disposal of chemicals and other potentially dangerous materials are provided.

We reduce risks to a minimum and adopt optimal preventive measures to avoid accidents and occupational illnesses, including measures for promoting health and safety at the workplace.

We provide employees with personal protective equipment for free required for the implementation of its activities.

Access to adequate medical assistance and facilities are provided to all employees.

All ADA Employees must have access to clean toilet facilities and to drinkable water, and if applicable, sanitary facilities for food preparation and storage.

Residential facilities for employees, where provided, must be clean and safe.

We provide adequate safeguards against fire and ensure the strength, stability and safety of buildings and equipment.

XIX. Fair competition / ban on cartels

The relevant provisions governing fair competition must be observed, same as the rules of antitrust and competition law. Every ADA Employee as well as all third Persons acting on behalf of ADA Cosmetics are obliged to observe the rules of fair competition and must not take any measures aimed at unlawfully restricting competition and/or infringing the statutory rules. Therefore, ADA Cosmetics does not tolerate any infringement of provisions of anti-trust law during committee procedure or at other meetings within ADA Cosmetics.

The basic principle is that all arrangements between competitors and decisions by associations of undertakings, aiming at preventing competition, are prohibited. The term 'arrangements' encompasses both formal agreements and decisions as well as concerted practices that tacitly arise.

The following are prohibited:

- Arrangements with competitors concerning prices and/or capacity.
- Agreements not to compete.
- The submission of sham bids.
- The allocation of customers, territories, production programmes or according to other segmentation criteria.
- Agreements on terms and conditions of sale.

When making any (verbal or written) statements, all ADA Employees are obliged to ensure that they cannot be misunderstood or interpreted in a way that may construe an unlawful act under anti-trust law.

Details are laid out in the *ADA-Antitrust Code of Conduct*.

XX. Anti-Corruption & Money Laundering

ADA Cosmetics Anti-Corruption Guideline sets forth the Anti-Corruption & Bribery Rules defined by the Management Committee of ADA Cosmetics. It is intended to create a common understanding. The Guidelines supports ADA Employees in dealing with the granting of benefits according to the law and in compliance with the values of the company. It is binding for all directors, officers, and all employees of ADA Cosmetics. Third parties representing ADA (such as agents, sales representatives, distributors, consultants) must agree to represent ADA in a manner consistent with this Guideline as well as with all applicable laws and regulations. It is important that this Guideline is part of the contractual agreements with third parties that represent ADA Cosmetics, i.e., that they are aware of this Guideline and have read/agreed to it.

Money laundering is a process which criminals use to make it look like the money they have is legitimately earned. ADA Cosmetics will not allow any criminals to “money launder” through its operations, supply chain and all other business activities.

ADA Cosmetics and ADA Employees do not tolerate immoral trade practices and reject any form of corruption, bribery and dishonesty to take advantage.

Further details are set out in the *ADA Anti-corruption and Bribery Policy*, available at this link: <https://ada-cosmetics.com/strategic-sustainability/transparency/>

XXI. Avoidance of Conflicts of Interest

ADA Cosmetics aims to avoid any conflict of interest. Conflicts of interest may cast doubt on ADA Cosmetics’ integrity and professionalism. Conflicts of interest must therefore be identified and avoided early on. For this reason, ADA Employees are contractually not allowed to carry out work for third parties during the term of their employment which might jeopardise the impartiality of their work for ADA Cosmetics or contradict the corporate philosophy stated in paragraph 2. Contractual relations with members of the family (parents, children as well as any other relatives – including life companions living in the same household as the ADA Employee)

are explicitly prohibited, since conflict of interest is inherent in such dealings, which could impair the impartiality required in the process of procurement.

Exceptions to these principles are only possible if they are permitted by the management of the ADA Group concerned or by the appropriate board.

ADA Cosmetics operates a zero-tolerance policy on the prohibition of all forms of bribery, corruption, extortion, and embezzlement.

XXII. Public appearances

ADA Employees must ensure that ADA Cosmetics' reputation is not harmed by their conduct in public. Any externally oriented information (e.g., to the press or to authorities) is only to be given by accordingly authorised ADA Employees. In topics affecting the reputation of ADA Cosmetics, the marketing communication department needs to be involved.

XXIII. Safeguarding of assets and duty of confidentiality

Both ADA Cosmetics and all ADA Employees are responsible for ensuring that tangible and intangible assets belonging to ADA and its providers are properly used, maintained and protected. The use for personal purposes without the consent of the owner is prohibited.

Confidential information, e.g., regarding customers and trade terms, are important assets belonging to ADA Cosmetics, its clientele and principals. It is therefore essential that trade and business secrets be kept confidential. ADA Employees are also required not to disclose information that is expressly termed confidential or the confidentiality of which is ascertainable.

Patents, inventions and other technical and scientific know-how belonging to ADA Cosmetics, or third parties made accessible to ADA Cosmetics are all particular significance. This intellectual property must not be passed on to unauthorised third parties or used for an individual's own business purposes. This intellectual property in the form of sketches, drawings, data media, documentation or any other means of storage must be protected from unauthorised third-party access.

All ADA Cosmetics' customers' and employees' information are strictly private and confidential and must be always treated as such. It must not be disclosed to anybody without proper authorization. There shall be no release of such information through the internet or any other means of information dissemination without proper authorisation.

The duty of confidentiality remains applicable to all ADA Employees after leaving the company.

XXIV. Acquisition of shares and prohibition on insider trading

All ADA Employees are privately, in principle, allowed to trade in shares and other financial instruments on stock exchanges and optimise their individual wealth. However, this freedom is restricted by law if so-called insider information is used for such dealings.

Insider information is specific information on circumstances that are not public knowledge, which relate to an issuer of insider documents or to insider documents themselves and are liable to materially influence the stock exchange or market price of insider documents on becoming public knowledge. This is the case when a knowledgeable investor would take account of the information when deciding to invest. 'Circumstances' means those matters where it can be assumed with sufficient probability that they will occur in the future. This insider information must not even be passed on to third parties to enable them to make the acquisition. In-sider information might relate, for example, to:

- new product developments and patents.
- sales and profit forecasts.
- operational changes.
- the sale or purchase of major assets.
- takeovers and mergers.

The ban on insider dealings applies to trading in shares of any quoted company, if ADA Employees hold important undisclosed information about that company, including information that such ADA Employees have obtained during their employment or work at ADA Cosmetics.

XXV. Proper bookkeeping principles

ADA Cosmetics is obliged to keep books and records that provide a clear and correct picture of its business and financial position.

All ADA Employees, who are working in the areas of Accounting, Reporting, Finance, Controlling, etc., are obliged to observe and comply with the relevant legislation and storage requirements due to regulatory or legal rules. Those ADA Employees shall ensure that all business transactions are carefully, correctly and comprehensively booked and documented. The following is assured in this respect:

- no secret or unrecorded credit balances or assets are established for any purpose.
- no faked or fictitious entries are made in ADA's books in any circumstances.
- no payment is approved or made where there is an intention or assumption that the payment is to be wholly or partly used for purposes other than stated.
- no private information relating to employee salary to be shared.

XXVI. Social Media Compliance

A. Attitude and behaviour

ADA Employees must always be respectful towards the company, the staff, the customers and partners. They show appropriate consideration when the privacy of other people is involved and avoid making comments of a derogatory nature, especially in relation to gender, ethnic origin, age, sexual orientation, political opinion, religion, or physical disability. Disagreements should always be verbalized in a mutually respectful way. Opinions cannot be forced on anyone.

Care needs to be taken when posting pictures of others online, including via social media sites. The Cyber Crimes Law in some of our entities makes it an offence to use any IT means to breach someone else's privacy, including taking pictures of others, or publishing or displaying those pictures. A person who takes a picture of another cannot distribute or publish such picture without the consent of the person appearing in the picture.

To create transparency, an ADA Employee always identifies himself as such when posting something about the company on the Internet and points out that the post reflects only his/her own opinion and not that of ADA Cosmetics. No posts should be edited without making an appropriate reference to this.

Confidential corporate information may under no circumstances be disclosed or discussed online. Strictly avoid disclosing information about ADA Cosmetics or a third party (customer, competitor, etc.) that is not already public, such as reports on product developments, market shares, pricing policy or business development. Journalists should be referred to the ADA Cosmetics' Marketing Communication Team.

ADA Cosmetics does not allow any online platform to be used to conduct hidden marketing. Accordingly, neither slander/libel/bad-mouthing of a competitor nor anonymous posts on third-party websites are allowed. This applies also to anonymously praising an ADA product in online platforms, blogs (social media) and websites. No one is anonymous online: Contributions of ADA Employees can be traced back and thus not only damage ADA's reputation, but also may entail legal consequences for the ADA Employee as well as the company.

B. Opinion & Views

ADA Employees must always observe the boundaries between expressing their own valid opinion (such as religious or political views) and asserting facts. The latter may on no account be incorrect, defamatory, or offensive. An ADA Employee has a "duty of fidelity/loyalty" to ADA Cosmetics that can also extend to his/her private life. ADA Cosmetics reserves the right to remove defamatory and pejorative contributions (known as "flaming") if the reputation of the company, its legal integrity, conformity with the compliance and IT Policies could be harmed or violated. ADA Employees respect intellectual property (IP) rights. Third-party material (photos, videos, literary works) may not be used deliberately free of charge or circulated without the consent of the author (IP rights holder).

Protection of trade secrets forms part of an ADA Cosmetics employment contract and thus also has an impact on (private) online activities in relation to ADA Cosmetics on online platforms, blogs (social media) and websites. Unauthorised disclosure of data, incorrect factual assertions and non-compliance with the ADA Cosmetics policies can have consequences

under local employment law. ADA Employees have an obligation, as a secondary contractual duty, to provide information on imminent damage or risks for the company that become known to them. The officer responsible for social communications should immediately be informed about statements that are negative or derogative to the company image.

To be able to pursue an effective and consistent social media strategy and to offer a uniform and coherent online presence, employees are not allowed to create profiles, accounts or similar representations with ADA Cosmetics identifying marks on social media platforms. An ADA Employee already running this kind of profile or who is aware of an unofficial profile must get in contact immediately with the officer responsible for Marketing Communication.

Personal accounts on platforms used for more “professional” purposes (e.g., Xing, LinkedIn) where information on the employer or the job position is given are excluded from this regulation.

XXVII. Confidentiality of Data and Information

ADA Cosmetics adheres to the General Data Protection Regulation (GDPR) of the European Union.

We comply fully with our obligations regarding the protection of the confidential data and information of ADA Cosmetics or our customers, suppliers, and business partners. We ensure that any data and information received is used solely for the purpose for which it was provided.

XXVIII. Compliance Management System

A. Compliance Organisation

Any ADA Employees meeting with difficulties in the application of this policy – for instance if they are uncertain about the correct way to proceed may – in the first place - consult the local Compliance Officer personally or the Group Compliance Officer via compliance@ada-cosmetics.com.

B. Reporting Compliance incidents

In the line of existing legislation for Whistleblowing, ADA Cosmetics allows any person who would like to report a wrongdoing, to use a special online channel. We are using a system called Compliance One: <https://ada-cosmetics.compliance.one>

Several hotlines are also offered:

- +442030068820 (English: for Europe)
- +498914379852 (German)
- +12245071765 (English: for Americas)
- +420910921021 (Czech)

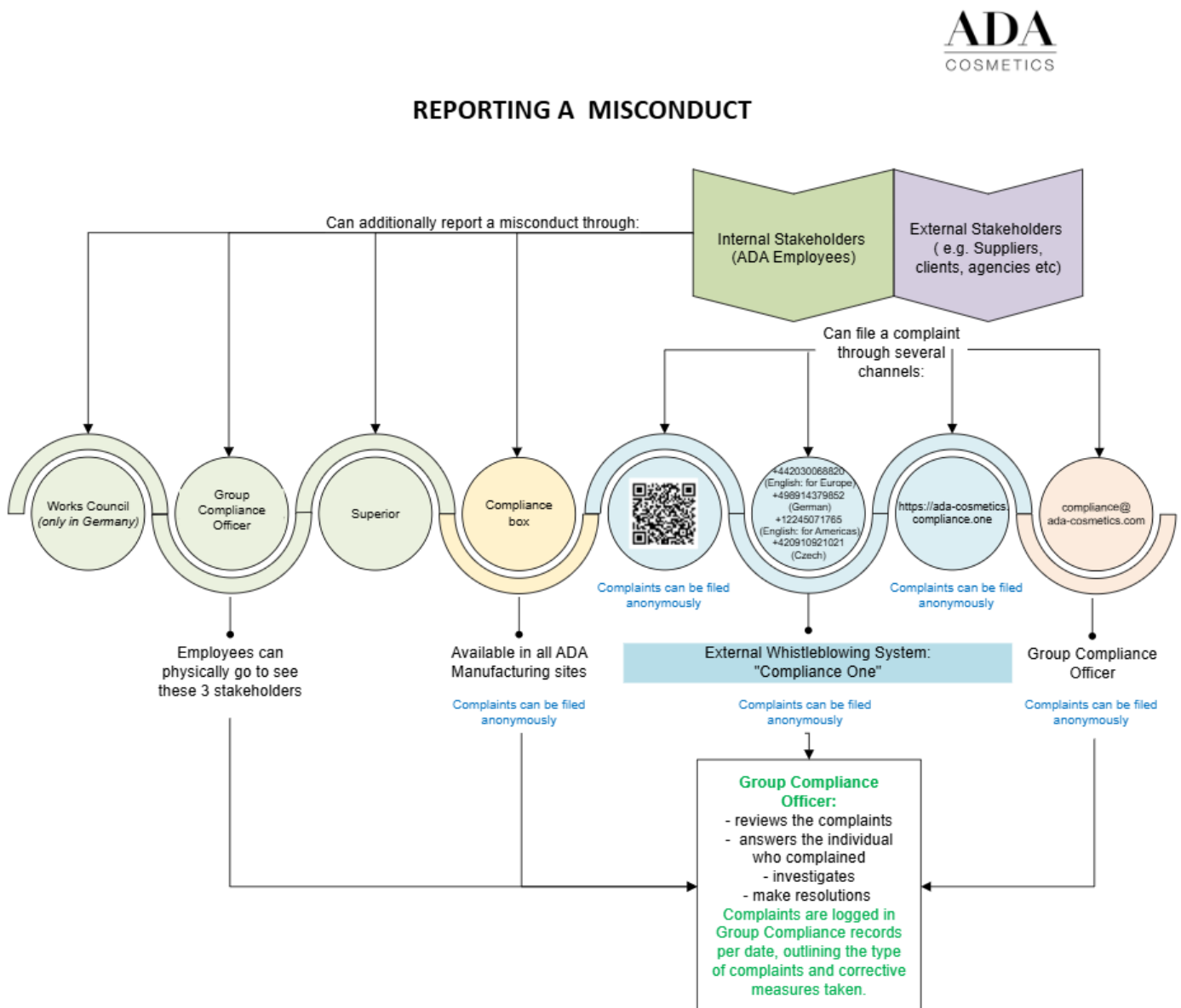
The whistle-blower will fundamentally be protected against any reprisals within the company, also by ensuring that the reporting procedure is anonymous from the outset. The reports will be submitted this way so that the whistle-blower is not revealed and complies with national data protection legislation.

ADA Cosmetics communicates to all stakeholders about its Whistleblowing system:

- Through a CSR Newsletter (to ADA Employees)
- Through a Whistleblowing Poster (to ADA Employees)
- Through a training platform (to ADA Employees)
- Through a Poster and e-mail (to all suppliers, clients...)
- Through this Code of Conduct (to all Stakeholders as available publicly online)

ADA's employees are also offered the possibility to report any type of complaint through a physical box located in all its sites where employees have no access to a computer.

Here is a summary of all types of channels internal and external stakeholders can use to file a complaint:



C. Consequences of misconduct

ADA Employees make all appropriate and reasonable efforts to constantly implement and apply the values and principles enshrined in this Code of Conduct. Breach of the Code of Conduct can result in employment-law measures including the termination of the employment contract. Severe matters could lead to claims in damages and/or result in criminal charges to the authorities. Third persons may also be subject to civil-law measures.