

CODE OF CONDUCT

of

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

(together called “ADA Cosmetics” hereinafter referred to as “ADA”)

Version 1.3- June 2026

The reputation of our company and of the entire ADA Group, as well as the trust of our business partners, our employees and the public, depends on the conduct of each ADA Employee.

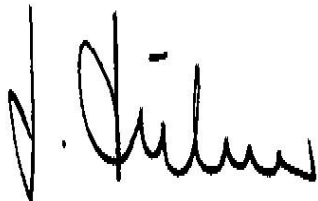
It is up to every individual to play a part in ensuring that the positive expectations associated with the ADA name are met. Our Code of Conduct is therefore a binding set of guidelines intended to provide a reliable source of guidance in day-to-day dealings, laying down the legal and ethical demands 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 Stock Corporation Act] (hereinafter referred to as “ADA”). It applies worldwide to all ADA employees, including members of the Management Committee, directors and executives (hereinafter “ADA Employees”). For third parties acting on behalf of ADA (e.g., agents, consultants, distributors and contractors), this Code defines the human rights and business conduct expectations applicable to their activities

Relevant provisions of this Code also apply to suppliers and other business partners, as further specified in the Supplier Code of Conduct.

II. Management Systems and Continuous Improvement

ADA Cosmetics is committed to implementing this Code of Conduct through documented management systems.

These systems include:

- Clearly assigned responsibilities at corporate and site level
- Written procedures covering all requirements of this code
- Regular training and awareness-raising for employees and relevant stakeholders
- Monitoring, record-keeping, and corrective action processes

HR managers are responsible for the day-to-day implementation and execution of this Code of Conduct at site level, including corrective actions. The Chief CSR & HR Officer ensures the effective implementation, monitoring and continuous improvement of this Code of Conduct and related management systems.

Overall accountability for compliance with this Code of Conduct remains with the Managing Directors of ADA Cosmetics.

Compliance with this Code is reviewed regularly through internal monitoring, audits and management review processes.

III. Vision and mission statement

ADA Cosmetics is committed to delivering high-quality products and services to its customers while meeting the expectations of the market and the public, and fulfilling its responsibility for employees and consumer safety.

ADA Cosmetics promotes a safe and healthy working environment and takes all reasonable measures to protect ADA Employees from occupational risks. Occupational health and safety are integral parts of the company’s policies and are subject to continuous improvement.

When selecting suppliers, service providers and other third parties, ADA Cosmetics applies clear criteria based on performance, quality and compliance with applicable standards. ADA Cosmetics expects all external stakeholders to uphold the same high standards as set out in this Code of Conduct.

A separate Supplier Code of Conduct & Ethics defines these expectations for supply chain partners.

ADA Cosmetics promotes fundamental values such as respect for human rights, fair employment practices, environmental responsibility and zero tolerance for corruption within its sphere of influence.

IV. Compliance with the Law

ADA Cosmetics is committed to conducting its business with integrity and in full compliance with the applicable laws and regulations. ADA Cosmetics and ADA Employees are required to observe all relevant legal requirements.

This includes in particular compliance with anti-trust and competition law, as well as regulations relating to anti-corruption, bribery, the prevention of money laundering, employment law, data protection, and environmental protection

Compliance with the law applies at all times, even where non-compliance could result in a perceived business advantage. All ADA Employees are expected to familiarize themselves with the legal requirements relevant to their 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.

V. Protection of human rights

In line with the United Nations Guiding Principles on Business and Human Rights, ADA Cosmetics is committed to respecting internationally recognized human rights frameworks and standards.

These include:

- 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 Labour 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)

These commitments also encompass all applicable laws relating to employment, human rights, environment protection, and health and safety.

Where local laws and international human rights standards differ, ADA Cosmetics seeks to apply the higher standard; where they are in conflict, ADA Cosmetics aims to respect internationally recognized human rights to the greatest extent possible.

ADA Cosmetics has issued a Human Rights Policy Statement, available at:

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

ADA Cosmetics also supports the Ten Principles of the United Nations Global Compact (UNGC) in the areas of human rights, labor, environment, and anti-corruption. We are committed to integrating these principles into our strategy, culture, and day-to-day operations, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

Further information is available at:

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

VI. Environmental Responsibility

ADA Cosmetics supports a precautionary approach to environmental challenges and is committed to minimizing negative environmental impacts within its sphere of influence. The company promotes responsible resource use and encourages the development and application of environmentally friendly technologies & practices.

ADA Cosmetics is committed to sourcing responsibly produced palm oil, palm kernel oil and their derivatives, and has been a member of the Round Table for Sustainable Palm Oil (RSPO) since 2019.

ADA Cosmetics complies with Regulation (EC) No 1223/2009 on cosmetic products and does not conduct animal testing for cosmetic purposes, neither for finished products nor for ingredients used, unless required by law. The same standards are expected from suppliers.

ADA Cosmetics is committed to environmental protection and the prevention of pollution. The company continuously improves its environmental performance through effective environmental management systems and, where applicable, ISO 14001 certification at site level.

Key environmental focus areas include:

- Reducing energy and water consumption
- Increasing the use of recycled materials in packaging
- Developing innovative and sustainable packaging solutions, supporting circular economy principles
- Reducing environmental impacts on water systems, including through collaboration with recognized certification initiatives such as Cradle to Cradle

ADA Cosmetics applies the 5R strategy (**R**efuse, **R**educe, **R**euse, **R**epurpose, **R**ecycle) to minimize waste and promote sustainable resource management. These principles are embedded in business operations and product development processes.

ADA Cosmetics sets targets to reduce its environmental footprint and enhance its positive contribution to society, taking into account the economic sustainability of the business.

Further details are set out in the ADA Cosmetics Environmental Policy, available at:

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

VII. Employment Practices

ADA Cosmetics provides fair and adequate remuneration to all of its employees and complies with all applicable wage laws, including statutory minimum wage requirements. ADA Cosmetics supports the effective elimination of all forms of forced and child labor, as defined by the International Labour Organization (ILO). ADA Cosmetics is committed to equal pay for equal work. Employees performing the same or equivalent work must receive equal remuneration, irrespective of gender. All ADA Employees are employed on the basis of written employment contracts in accordance with applicable local law and in a language they understand. ADA Cosmetics does not charge employees for any recruitment fees or related costs, directly or indirectly, regardless of the outcome of the recruitment process. All employment decisions, including recruitment, job assignment, compensation, benefits, training, promotion, and disciplinary actions, are based solely on qualifications, experience, and performance. Personal characteristics are not considered in these decisions.

VIII. Freedom of Association and Collective Bargaining

ADA Employees, without distinction, have the right to form or join trade unions of their own choosing and to bargain collectively, in accordance with ILO Conventions No. 87 (Freedom of Association) and No. 98 (Right to Organize and Collective Bargaining).

ADA Cosmetics does not interfere with, obstruct, or prevent such legitimate activities and does not discriminate against or penalize employee representatives or trade union members due to their membership, affiliation, or legitimate union activities.

ADA Cosmetics adopts an open and constructive approach towards trade unions and their organizational activities and ensures that employees representatives have access to the workplace to carry out their representative functions.

Where freedom of association or collective bargaining is restricted by law, ADA Cosmetics supports alternative forms of worker representation that enable employees to raise concerns and seek dialogue without fear of retaliation.

IX. Forced Labor

ADA Cosmetics strictly prohibits all forms of forced, compulsory, or trafficked labor.

Forced or compulsory labor is defined as any work or service that is exacted from a person under the threat of a penalty and for which the person has not offered themselves voluntarily. Labor trafficking refers to the recruitment, transportation, transfer, harbouring, or receipt of persons through force, fraud, or coercion for the purpose of exploitation.

Employment must be freely chosen: All work must be performed on a voluntary and paid basis and not under threat of any penalty or sanction. The use of forced, compulsory or unpaid labor in any form, including prison labor and unpaid overtime, is prohibited.

ADA Cosmetics is committed to responsible recruitment practices:

- No recruitment fees or related costs are charged to workers, directly or indirectly

- Employees are not required to lodge deposits or provide financial guarantees
- Employees retain control of their identity documents at all times; such documents must not be withheld or confiscated
- Recruitment agencies are only used following appropriate due diligence and must comply with responsible recruitment principles

These requirements apply to all workers, including permanent, temporary, agency and migrant workers.

Wage must be paid regularly and without abusive delay.

Employees have the right to terminate their employment in accordance with applicable laws and to leave the workplace freely after completing their work shift.

Further details on responsible recruitment practices are set out in ADA Cosmetics' Equal Employment Opportunity (EEO) statement which is publicly available on our website for all stakeholders.

X. Child Labor

ADA Cosmetics strictly prohibits all forms of child labor and recognizes the right of children to protection from economic exploitation, abuse, and neglect.

In accordance with the ILO Convention N° 138, the minimum age for employment is 15 years, provided that compulsory schooling has been completed, or a higher minimum age where applicable national law.

ADA Cosmetics ensures that young employees (under the age of 18) are not employed in hazardous conditions and do not perform night work or overtime. Their working conditions must not jeopardize their health, safety, moral development, or access to education.

If child labor is identified, ADA Cosmetics will take immediate action to remove the child from harmful situations, acting in the best interests of the child. Remediation measures will prioritize the child's safety, continued access to education, and long-term well-being, in line with applicable laws and ILO guidance.

The dismissal of a child without appropriate safeguards and support measures is not considered an acceptable remedial action.

XI. Modern Slavery

Modern Slavery refers to the exploitation of individuals for personal or commercial gain through means as force, fraud, coercion, or deception, resulting in the loss of an individual's freedom.

ADA Cosmetics is committed to preventing, identifying, and addressing modern slavery risks within its operations and supply chain worldwide. In line with the OECD Guidelines for Multinational Enterprises, ADA Cosmetics applies a risk-based due diligence approach to identify, prevent, mitigate, and account for adverse impacts related to human rights, labor conditions, the environment,

corruption and business conduct.

ADA Cosmetics raises awareness of modern slavery through regular training and communication, ensuring that employees are able to identify potential issues and report concerns.

Accessible grievance mechanisms are in place for employees and external stakeholders, including local support channels, dedicated helplines, and an anonymous external whistleblowing platform, enabling individuals to report suspected misconduct without fear of retaliation.

ADA Cosmetics fosters a culture of shared responsibility, encouraging all employees and stakeholders to report concerns and contribute to the prevention of modern slavery.

Further details on ADA Cosmetics' approach to human rights and modern slavery are available in the relevant policies and statements published on our website:

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

XII. Working Hours

Working hours must comply with applicable national and local laws, collective agreements, and this Code of Conduct, whichever affords greater protection to employees.

Where no legal requirements or collective agreements exists, the relevant international standards, including those of the International Labour Organization (ILO), shall apply.

Working hours, excluding overtime, must be defined by contract, voluntary, and shall not exceed 48 hours per week. Employees are entitled to at least one day off (24 consecutive hours) in every seven-day period.

Overtime must be voluntary, limited and not requested on a regular basis. Where overtime is necessary, it must be used responsibly, taking into account the duration, frequency, and total hours worked by individual employees and the workforce as a whole and ensuring compliance with applicable laws.

ADA Cosmetics ensures that working hours are monitored through appropriate systems, enabling active management of working time, rest periods, and compliance with legal requirements.

Working hours and wage payments must be accurately recorded and maintained to enable verification.

Working hours may exceed 48 hours in any 7-day period only in exceptional circumstances, provided that all of the following conditions are met:

- Permitted by applicable national and local law.
- Permitted by a collective agreement freely negotiated with a representative workers' organization
- Appropriate safeguards are implemented to protect employees' health and safety
- Exceptional circumstances can be demonstrated (e. g. unexpected production peaks, system implementations, or emergencies)

ADA Cosmetics recognizes that certain roles, such as senior management positions or employees in field-based functions, may require a higher degree of flexibility in working hours due to the nature of their responsibilities.

In such cases, working time arrangements remain subject to applicable laws and must be managed in a way that safeguards employees' health and safety, ensures adequate rest, and avoids excessive or sustained overwork.

In exceptional situations, such as major projects or peak business demands, temporary deviations from standard working hours may occur. These situations must be limited in duration, actively managed, and, where possible, followed by appropriate compensatory measures.

Employees will not be penalized if they are unable to work overtime for legitimate personal reasons.

XIII. Wages and Benefits

All ADA Employees are provided with clear, written, and understandable information regarding their wages and employment conditions before the start of employment, and with detailed information on their wages for each pay period.

ADA Cosmetics ensures that wages are paid regularly and in full, and that employees are compensated for their work, including overtime, in accordance with applicable laws, collective agreements, or company policies. Where applicable, compensation may be provided in the form of pay, time off in lieu, or other agreed arrangements.

ADA Cosmetics provides all legally required benefits and paid leave, meeting or exceeding statutory minimum requirements and applicable collective agreements, whichever is more favorable to employees.

Deductions from wages as a disciplinary measure are not permitted. Any deductions from wages must be lawful, transparent, and with the knowledge of the employee. All disciplinary measures are documented.

Where appropriate, ADA Cosmetics supports flexible working arrangements, including flexible working hours remote work models, taking into account the nature of the role and operational requirements. Such arrangements are subject to regular review and may be adjusted or withdrawn where necessary, in line with business needs, performance requirements, and applicable policies.

ADA Cosmetics is committed to assess whether its employees receive a living wage, defined as a wage sufficient to cover the basic needs of employees and their families in the local context, including food, housing, healthcare, education, transportation, and a degree of discretionary income.

Based on this assessment, ADA Cosmetics aims to identify gaps per country and to develop a structured roadmap towards progressively achieving living wages for all employees by 2030, in a manner that is sustainable for the business and aligned with its economic environment.

XIV. Equal Opportunity and Non-Discrimination

ADA Cosmetics is committed to providing equal opportunity in all aspects of employment and strictly prohibits any form of discrimination.

Discrimination in recruitment, hiring, training, working conditions, job assignments, compensation, benefits, promotions, disciplinary actions, termination or retirement is not permitted on the basis of gender, including gender identity, age, religion, marital status, race, caste, social background, health status, disability, pregnancy, ethnic and national origin, nationality, membership in worker organizations (including trade unions), political affiliation, sexual orientation, or any other personal characteristic protected by law.

All employment-related decisions are based solely on qualifications, experience, and performance.

ADA Cosmetics promotes a respectful and inclusive working environment in which all employees are treated with dignity and fairness. Employees have the right to participate in employee representation structures and to join trade unions in accordance with applicable laws.

XV. Harassment and Bullying

ADA Cosmetics prohibits any form of harassment, bullying, abuse, intimidation, or violence, whether physical, verbal, psychological or sexual.

Harassment includes any unwanted conduct (whether physical, verbal, or non-verbal) that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive working environment. A single incident may constitute harassment.

Examples of prohibited conduct include, but are not limited to:

- Physical violence, including hitting, pushing, or any form of physical coercion
- Verbal abuse, including shouting, threatening, demeaning, or insulting language
- Written or digital harassment, including inappropriate or offensive communication via email, messaging platforms, or other digital tools
- Misuse of authority or power to intimidate, coerce, or humiliate others

Sexual harassment is strictly prohibited and includes any unwanted conduct of a sexual nature that violates a person's dignity or creates an offensive environment. This applies in the workplace and in work-related contexts such as business travel, events, and digital communication.

ADA Cosmetics is committed to maintaining a working environment in which all individuals are treated with dignity and respect. Any concerns or incidents of harassment are taken seriously and will be addressed promptly and appropriately.

Employees who experience or witness harassment are encouraged to report concerns through the available reporting channels. ADA Cosmetics ensures that reports are handled confidentially and without retaliation.

Any employee found to have engaged in harassment, or bullying will be subject to disciplinary action, up to and including termination of employment. Disciplinary measures must always be fair,

proportionate, and documented and must never include humiliation, threats or coercion.

XVI. Diversity, Equity and Inclusion

ADA Cosmetics is committed to promoting diversity, equity, and inclusion and to ensuring fair treatment and equal opportunities for all employees and applicants.

Discrimination, prejudice, and unequal treatment based on protected characteristics are not tolerated. Further details on ADA Cosmetics' Diversity, Equity and Inclusion approach are set out in the relevant policy, available at:

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

XVII. Human Rights and Community Rights

ADA Cosmetics respects internationally recognized human rights, including those set out in the Universal Declaration of Human Rights.

ADA Cosmetics recognizes the legal, customary, and user rights of Indigenous Peoples and local communities to their lands, territories, and resources.

ADA Cosmetics respects the principle of Free, Prior, and Informed Consent (FPIC) and expects its employees and relevant stakeholders to uphold this principle, particularly in activities that may affect Indigenous Peoples and local communities.

This includes respecting FPIC in supply chains such as palm oil sourcing, where land use and community rights may be impacted.

XVIII. Fair Competition and Antitrust

ADA Cosmetics is committed to fair and lawful competition and complies with all applicable antitrust and competition laws.

All ADA Employees and third parties acting on behalf of ADA Cosmetics are required to adhere to the principles of fair competition and must not engage in any activities that unlawfully restrict competition.

In particular, the following practices are strictly prohibited:

- Agreements or arrangements with competitors regarding prices, pricing elements, or production capacity
- Market sharing, including the allocation of customers, territories, or product segments
- Bid rigging or submission of sham bids
- Agreements to limit or avoid competition
- Coordination or exchange of sensitive information restricting competition

“Arrangements” include both formal and informal agreements, as well as coordinated practices, whether explicit or implicit.

ADA Cosmetics does not tolerate any violations of antitrust or competition law, including in meetings, committees, or informal exchanges with competitors.

Employees must ensure that their communications, whether verbal or written, cannot be interpreted as anti-competitive behavior.

Further details are set out in the ADA Antitrust Code of Conduct.

XIX. Anti-Corruption & Money Laundering

ADA Cosmetics is committed to conducting its business with integrity and strictly prohibits all forms of corruption, bribery, fraud, and unethical business practices.

ADA Employees and third parties acting on behalf of ADA Cosmetics must not offer, promise, give, request, or accept any undue advantage or benefit to influence business decisions or obtain an improper advantage.

All business activities must comply with applicable anti-corruption, anti-bribery, and anti-money laundering laws and regulations.

ADA Cosmetics does not tolerate money laundering or the use of its operations, supply chains, or business relationships for the purpose of concealing or legitimizing unlawfully obtained funds.

Third parties representing ADA Cosmetics are required to comply with applicable laws and to act consistently with ADA Cosmetics' ethical standards. Where appropriate, these requirements must be reflected in contractual agreements.

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

XX. Conflicts of Interest

ADA Cosmetics requires all employees to avoid situations where personal, financial, or other interests could conflict, or appear to conflict, with the interests of the company.

All actual, potential, or perceived conflicts of interest must be disclosed promptly to the company. Employees must ensure that their professional judgment and business decisions remain objective and independent.

Conflicts of interest may arise, for example, from:

- Secondary employment or external business activities
- Personal or financial relationships with business partners, suppliers, or competitors
- Family or close personal relationships within business relationships or decision-making processes

Such situations must be managed transparently and, where necessary, mitigated or avoided in line with company policies.

Any external activities or engagements that may affect an employee's duties at ADA Cosmetics require prior approval, in accordance with applicable internal policies.

Exceptions to these principles may only be granted with appropriate management approval.

Further details on the identification, disclosure, and management of conflicts of interest are set out in the relevant policy, available at:

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

XXI. Public Appearances and External Communication

ADA Employees must ensure that their conduct in public and in professional contexts does not harm the reputation of ADA Cosmetics.

External communication on behalf of ADA Cosmetics, including communication with the media, authorities, or other external stakeholders, may only be made by duly authorized employees.

In matters that may affect the reputation of ADA Cosmetics, the Marketing and Communications function must be consulted and involved.

XXII. Safeguarding of Assets and Confidentiality

ADA Cosmetics and all ADA Employees are responsible for protecting the company's tangible and intangible assets, as well as assets entrusted to ADA Cosmetics by third parties. These assets must be used appropriately, maintained with care, and protected against loss, damage, misuse, or unauthorized access.

Confidential information, including business, technical, and commercial information relating to ADA Cosmetics, its customers, and its business partners, must be treated as strictly confidential and must not be disclosed without proper authorization.

Intellectual property, including patents, inventions, and technical know-how, must be protected and must not be used for personal purposes or disclosed to unauthorized third parties.

All personal data relating to employees, customers, and business partners must be handled in accordance with applicable data protection laws and must be treated as confidential at all times.

The obligation to maintain confidentiality continues to apply after the end of employment.

XXIII. Insider Trading

ADA Employees may engage in personal investments, including trading in shares or other financial instruments, in accordance with applicable laws.

Employees must not use or disclose inside information for personal gain or to benefit others.

Inside information refers to non-public information that could materially influence the price of financial instruments if made public.

Examples of inside information may include:

- New product developments or innovations
- Financial results or forecasts
- Significant operational changes
- Mergers, acquisitions, or major transactions

The prohibition of insider trading applies to trading in the securities of any company where ADA Employees have access to relevant non-public information.

XXIV. Proper Bookkeeping and Financial Integrity

ADA Cosmetics maintains accurate and complete books, records, and financial statements that reflect its business activities and financial position in accordance with applicable laws and regulations.

Employees involved in accounting, financial reporting, controlling, and related functions must ensure that all business transactions are recorded accurately, completely, and in a timely manner, and in compliance with applicable legal and regulatory requirements.

In particular:

- No unrecorded funds, assets, or liabilities may be established for any purpose
- No false, misleading, or fictitious entries may be made in the company's books or records
- No payment may be approved or made with the intent that it is used for purposes other than those properly documented

All financial records and supporting documentation must be retained in accordance with applicable legal and regulatory requirements.

XXV. Social Media and Online Conduct

ADA Employees must use social media and online communication responsibly and must ensure that their conduct does not harm the reputation of ADA Cosmetics.

Employees must communicate respectfully and avoid any statements that are offensive, discriminatory, defamatory, or otherwise inappropriate, particularly in relation to protected characteristics.

When engaging online, employees must respect the privacy and rights of others and must not publish or share images, personal data, or information without appropriate consent.

Confidential or non-public information relating to ADA Cosmetics, its customers, business partners, or competitors must not be disclosed or discussed on any online platform.

Employees must clearly distinguish between personal opinions and official company statements.

Any public communication on behalf of ADA Cosmetics may only be made by duly authorized employees. Media inquiries must be referred to the Marketing and Communications function.

ADA Cosmetics does not permit the use of social media or other online platforms for hidden marketing, misleading statements, or the anonymous promotion or criticism of products, services, or competitors. Employees creating or using professional profiles (e.g. LinkedIn) may state their role at ADA Cosmetics but must ensure that their content does not imply official representation without authorization and complies with this Code of Conduct.

The use of ADA Cosmetics' name, trademarks, or branding in social media accounts, pages, or profiles requires prior approval.

Any misuse of confidential information, misrepresentation, or breach of applicable laws or company policies in online activities may result in disciplinary action.

XXVI. Data Protection & Confidentiality

Cosmetics is committed to protecting personal data and confidential information in accordance with applicable data protection laws, including the European Union General Data Protection Regulation (GDPR), as well as other relevant local regulations.

All ADA Employees must handle personal data and confidential information relating to ADA Cosmetics, its employees, customers, suppliers, and business partners with care and in compliance with applicable legal and internal requirements.

Personal data and confidential information may only be collected, used, and processed for legitimate business purposes and must not be disclosed to unauthorized persons.

ADA Employees must ensure that data is protected against unauthorized access, loss, misuse, or disclosure.

XXVII. Compliance Management System

ADA Cosmetics has established a Compliance Management System to ensure adherence to this Code of Conduct and applicable laws.

Employees who have questions or uncertainties regarding the application of this Code are encouraged to seek guidance from their local Compliance Officer or the Group Compliance function (compliance@ada-cosmetics.com).

A. Reporting Concerns and Whistleblowing

ADA Cosmetics provides accessible, confidential, and, where permitted by law, anonymous reporting channels for employees and external stakeholders to report concerns or suspected violations of this Code of Conduct, laws, or regulations.

Reports can be submitted via the designated external whistleblowing platform ("Compliance One") or

through available hotlines and internal reporting channels.

ADA Cosmetics is committed to protecting individuals who report concerns in good faith from any form of retaliation. All reports will be handled confidentially and in accordance with applicable data protection laws.

Where ADA Cosmetics identifies that it has caused or contributed to adverse impacts, it commits to providing or cooperating in appropriate remediation, in line with applicable laws and internationally recognized standards.

ADA Cosmetics promotes awareness of its reporting mechanisms and ensures that employees and relevant stakeholders have access to appropriate channels, including digital and, where necessary, non-digital reporting options.

Where complex or systemic issues are identified, ADA Cosmetics will work collaboratively with relevant stakeholders to implement effective and sustainable corrective actions, in line with applicable standards such as SMETA 7.0.

Below is a graphical summary of all channels available to internal and external stakeholders to file complaints.

B. Consequences of misconduct

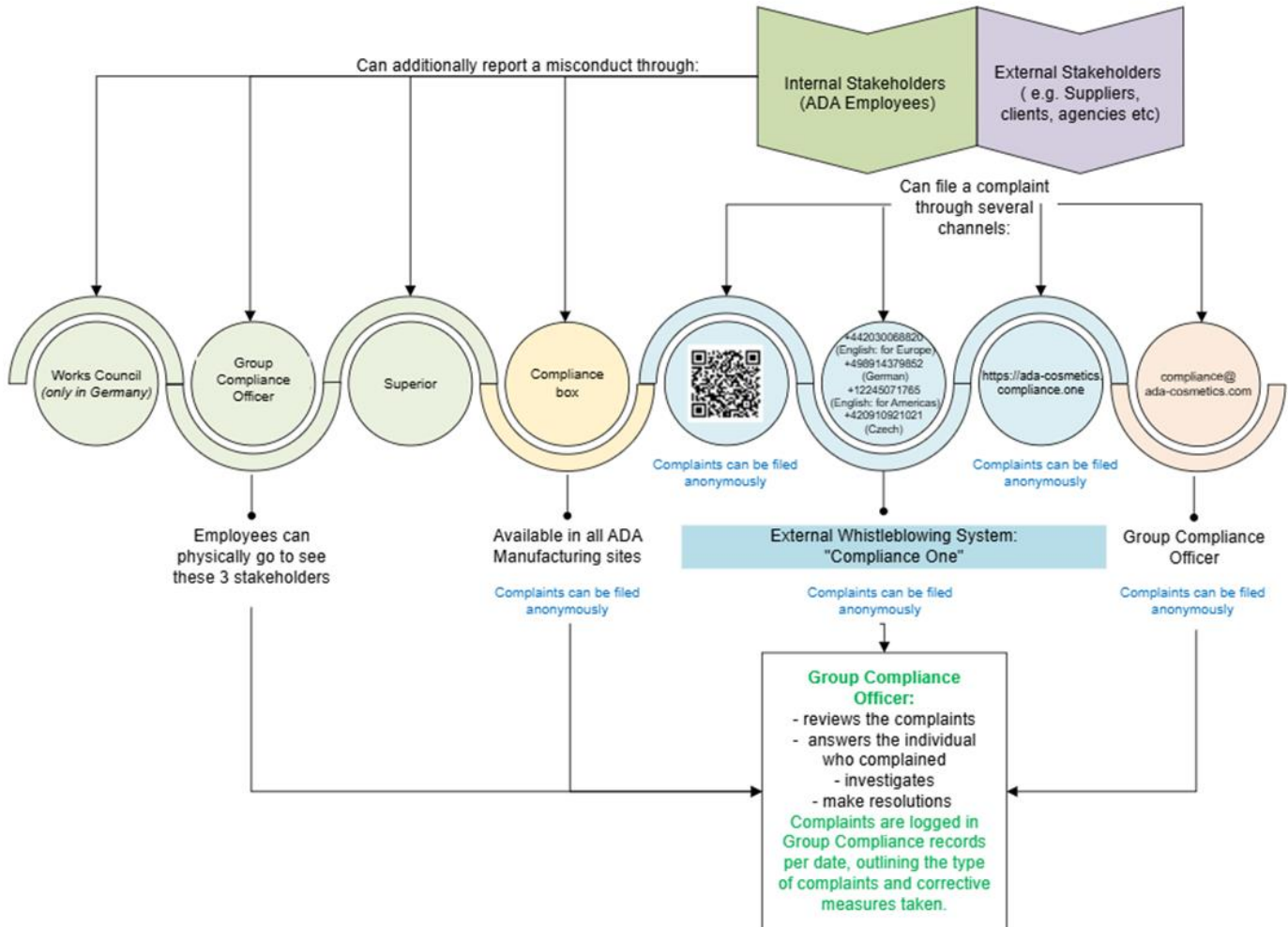
ADA Employees are expected to comply with this Code of Conduct and to act in accordance with its principles at all times.

Any violation of this Code of Conduct may result in disciplinary action under applicable employment laws and company policies, up to and including termination of employment.

Serious violations may also result in civil or criminal liability and may be reported to the relevant authorities.

Third parties acting on behalf of ADA Cosmetics who breach this Code of Conduct may face contractual consequences, including termination of the business relationship and potential legal action.

REPORTING A MISCONDUCT



XXVIII. Annex

Revision history

V1.0. First version January 2022

V1.1. March 2023. Addition of Freedom of Association and Collective Bargaining, Forced and Child Labor, Working hours, Wages and Benefits, Harassment, Diversity, Equity and Inclusion, Health & Safety

V1.2. March 2025. Addition of Modern Slavery, Human Rights Policy Statement, 5R strategy in Environmental responsibility, commitment on living wage, more details in Harassment chapter, Compliance Management System update

V1.3 June 2026. New chapter on Management systems and Continuous Improvement, update of several chapters, and addition of Revision history.