

## WHISTLEBLOWING POLICY

January 2024

Compliance with the law is the basis of all our activities, and we see honest, ethical, and compliant behaviour as the foundation of our corporate success. To this end, we have set up certain internal policies in which we specify rules of conduct for specific areas (e.g., our Code of Conduct). We expect all employees to adhere to our high standards and all employees are also committed to these standards accordingly.

Nevertheless, there is a risk for every organization that something will go wrong from time to time, or that employees will unknowingly or knowingly engage in unethical or illegal behaviour. A culture of openness and accountability is essential to prevent such situations or to manage them if they do occur.

For us to live up to this claim, it is important to learn about potential misconduct and to put a stop to it. Accordingly, it is very important to us to receive information about potential misconduct and to encourage people to report potential misconduct without fear of sanctions or discrimination.

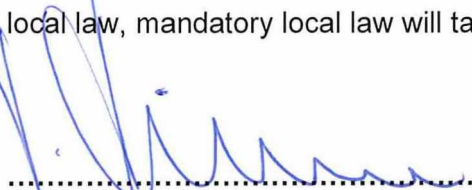
The central message of this Policy is:

Whistle-blowers are protected from sanctions, reports are treated confidentially, and the identity of whistle-blowers is not disclosed if they wish to do so, and it is legally possible. All plausible reports will be investigated, and action will be taken as appropriate.

This Policy applies to all employees, trainees, interns, board members, managers, and other employees, as well as all freelancers (hereinafter uniformly referred to as "employees").

In addition, this Policy applies mutatis mutandis to all other parties entitled to report, namely applicants, former employees, all business partners such as suppliers, service providers and customers, shareholders, sales representatives, intermediaries, and all other relevant stakeholders who have knowledge of misconduct within the Company.

Mandatory local law stays unaffected by this Policy. If this Policy conflicts with mandatory local law, mandatory local law will take precedence.



.....

**Lutz Hübner**

**CEO, ADA Cosmetics**

## Table of Contents

I.	How can Potential Misconduct be Reported? .....	3
II.	Who Can Report Potential Misconduct? .....	6
III.	What Can and Should be Reported? .....	6
IV.	What Happens After a Report or How are Reports Processed? .....	7
V.	How are Whistle-blowers Protected? .....	9
VI.	How are Reported Persons Protected? .....	10
VII.	Data Protection.....	11
VIII.	Consequences of Violations .....	12
IX.	Effectiveness of the whistleblowing system .....	12























