

Modern Slavery & Human Trafficking Statement 2024

Introduction by Lutz Hübner

CEO of ADA Cosmetics International



Our Social and Ethical Commitment

As a global company, we are acutely aware of our social and environmental impact across the regions in which we operate. We actively support a wide range of social initiatives that benefit local communities—collaborating with food banks, schools, sports clubs, orphanages, and more.

We redistribute surplus assets to local non-profit organisations where we have a local presence. We have also donated cosmetic and hygiene products, along with warm winter clothing, to individuals affected by the war in Ukraine.

Given our presence in numerous countries, ADA Group is committed to upholding and promoting internationally recognised human rights standards—for our employees and throughout our global supply chains. We strive to maintain high social standards in all aspects of our operations.

Through our established due diligence process, we follow the OECD Guidelines to identify, prevent, and mitigate adverse impacts related to human rights, labor conditions, environmental protection, anti-bribery, and consumer rights. We also adhere to corporate governance principles relevant to our operations, supply chains, and business relationships.

ADA Cosmetics proudly 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 embedding these principles into our strategy, culture, and daily operations, while engaging in collaborative projects that advance the broader goals of the United Nations—particularly those aligned with sustainable development.

In 2024, additional employees received training on modern slavery. We aim to expand participation in both modern slavery and anti-corruption training programs throughout 2025.

Organizational Structure & Supply Chain

We are a manufacturer and supplier in the hotel cosmetics sector, employing over 600 people worldwide. Our group companies operate in more than 109 countries, with a global annual turnover exceeding €118 million.

Our business is structured into five primary units serving the following regions:

- Europe
- United Kingdom
- Africa & the Middle East
- Asia & the Pacific
- North & South America

Our internal manufacturing facilities are in:

- Germany
- Czech Republic
- Malaysia

We are committed to providing a safe and supportive working environment for both internal and contracted staff.

Our global supply chain is overseen by our Chief Financial Officer based in Germany. Supply chain offices in the UK, USA, Asia, and the Czech Republic coordinate closely with our German headquarters to ensure efficient and ethical operations worldwide.

Policies on Slavery & Human Trafficking

To reflect our ethical values, we have implemented robust policies and procedures that guide our employees in making responsible decisions when engaging with third-party partners.

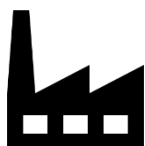
All employees are employed under fair and lawful contracts, and we strictly adhere to all relevant local labor laws. We categorically prohibit child labor, forced labor, and any form of exploitation across our operations. The ADA Group maintains a zero-tolerance policy toward human rights violations.



398+Suppliers



600+ Employees



3 Internal Factories



23 Sourcing Countries

How have we improved in 2024?

In 2024, we made significant strides in strengthening our commitment to responsible business practices and human rights. Key developments include:

- **Responsible Sourcing Policy**

We continued to enhance our *Responsible Sourcing Policy*. Every new supplier is assessed for compliance with our standards, focusing on their responsibility toward people and the planet. This also extends to our customers: upon request, we conduct interviews with hotel partners to share insights into our supply chain practices and demonstrate our commitment to ethical sourcing.

- **Risk and Impact Assessments**

Beyond selecting more sustainable raw materials, we improved our purchasing practices across the value chain. We conducted Impact, Risk, and Opportunity Assessments at all three of our production sites, as well as Human Rights Risk Assessments that considered the countries of our Tier 1 suppliers and the specific risks of our industry. These findings were presented to our Leadership Team in 2024.

- **Supplier Engagement**

Through our *Supplier Onboarding Process* and the application of our Responsible Sourcing Policy, we continue to align our suppliers with our sustainability goals. In 2024, we began evaluating our largest suppliers using a revised scorecard that incorporates Corporate Social Responsibility (CSR) criteria.

- **Employee Training via ADA Academy**

We launched the *ADA Academy*, a global training platform where employees can access CSR-related learning materials. These resources are translated as needed and integrated into our new employee onboarding process to ensure consistent awareness and understanding across all regions.

- **Modern Slavery Risk Assessments**

We continued conducting Modern Slavery Risk Assessments at our internal factories and offices. In 2025, we plan to extend these assessments to our third-party manufacturers.

- **Commitment to the UN Global Compact**

Since joining the United Nations Global Compact (UNGC) in 2023, we have reaffirmed our commitment to placing human rights at the core of our strategy. In 2024, we updated our Human Rights Policy to reflect this commitment and to support continuous progress on the UNGC's Ten Principles.

- **Human Rights Due Diligence Management System**

In 2024, we began developing a comprehensive *Human Rights Due Diligence Management System*. This framework provides a structured and transparent approach to managing risks related to human rights, environmental responsibility, supply chain integrity, and legal compliance.

- **SEDEX Membership**

We became a SEDEX member in December 2023. This enables us to assess human rights risks within our supply chain and prioritize actions to mitigate them effectively.

- **SMETA Audits**

In 2024, we conducted 4-pillar SMETA audits at our production sites. All corrective action plans were successfully closed within the same year.

- **Anonymous Complaint Mechanisms**

To ensure accessibility for all employees, we introduced physical complaint boxes in locations where digital access is limited. Employees can now submit anonymous complaints either online or physically, depending on their preference.

- **Modern Slavery Awareness Campaign**

We continue to display Modern Slavery Awareness Posters across all our locations. These posters are translated into local languages and help new employees understand what modern slavery is, how to recognize the signs, and how to respond. They provide essential information that could help protect potential victims.

Some of the Initiatives we work with or fund: -



Canopy [Homepage](#) | [Canopy Planet](#)



Kuamut Rainforest Conservation Project [Kuamut Rainforest Conservation Project, Malaysia - Permian Global](#)

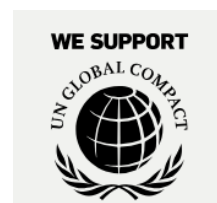


The Ocean Clean Up [The Ocean Cleanup](#)



Aqua Pearl Foundation [AQUA PEARLS For You and Planet Blue - AQUA PEARLS Foundation](#)

Our Commitments



Anti-Trafficking



Our Performance

As part of our ongoing commitment to sustainability, our performance was evaluated in 2024 through our sustainability management system. We were proud to receive a **Gold Medal from EcoVadis**, a globally recognized leader in business sustainability ratings. This award reflects our achievements in environmental, social, and ethical performance. By benchmarking our practices against international standards, we ensure compliance with the highest expectations and reinforce our position as a sustainability leader in the hotel cosmetics industry.

Reporting a Wrongdoing

ADA Cosmetics is committed to transparency and accountability. If an employee or stakeholder reports a concern in public interest, this is considered **whistleblowing**.

Whistleblowing may relate to criminal activity (e.g. theft), unethical behavior (e.g. racism, sexism, homophobia), or any other form of misconduct or non-compliance. All reports are taken seriously and are assessed in line with our **Code of Conduct, Anti-Corruption Guidelines**, and **Human Rights Policy**.

To comply with the **Whistleblower Protection Act**, we provide a secure and confidential reporting platform:

COMPLIANCE.ONE: <https://ada-cosmetics.compliance.one>

This platform is accessible to employees, partners, and third parties.

Concerns can also be reported via email:

compliance@ada-cosmetics.com

Further information and our official policy statements are available on our website:

www.ada-cosmetics.com/en/sustainability/transparency/

Legal Statement

On behalf of ADA Cosmetics International:

This statement is made pursuant to **Section 54(1) of the UK Modern Slavery Act 2015** and constitutes our **Group's Slavery and Human Trafficking Statement** for the financial year ending **31 December 2024**.

Signed:  Date: 16.06.2025

Lutz Hübner

CEO ADA Cosmetics International