

ADA Cosmetics International- Modern Slavery & Human Trafficking Statement 2025



Statement from the Chief Executive Officer

At ADA Cosmetics International, we are committed to conducting business responsibly, ethically and with respect for human rights. As a global manufacturer and supplier of hotel cosmetics and guest amenities, serving hospitality partners across more than 100 countries, we recognise the important role we play in promoting fair working conditions and preventing modern slavery throughout our operations and supply chains.

Modern slavery, forced labour, human trafficking and other forms of exploitation have no place in our business. We maintain a zero-tolerance approach to these practices and are committed to identifying, preventing and addressing any risks that may arise within our organisation or supply network.

Throughout 2025, we continued to strengthen our human rights governance, enhance supply chain due diligence, expand employee awareness programmes and further embed responsible sourcing principles into our business processes. These actions reflect our commitment to continuous improvement and our responsibility to operate with integrity across all regions where we conduct business.

Our approach is guided by internationally recognised standards, including the OECD Guidelines for Multinational Enterprises and the Ten Principles of the United Nations Global Compact. Through these frameworks, we seek to uphold the highest standards of human rights, labour practices, environmental responsibility and ethical business conduct.

This statement sets out the steps taken by ADA Cosmetics International during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking within our operations and supply chains. It is published in accordance with Section 54 of the UK Modern Slavery Act 2015.

Lutz Hübner
Chief Executive Officer
ADA Cosmetics International

Human Rights and Ethical Business Conduct

As a global organisation, ADA Cosmetics International recognises that our business activities have an impact on people, communities and the environment. We are committed to operating responsibly and creating positive social value wherever we do business.

Our commitment to human rights extends beyond our own workforce and encompasses our suppliers, contractors, business partners and the communities in which we operate. We strive to ensure that all individuals connected to our business are treated with dignity, fairness and respect.

Throughout 2025, we continued to support a range of social and community initiatives across our global locations. These included partnerships with local food banks, schools, sports organisations, charitable institutions and community support programmes. We also continued our efforts to redistribute surplus products and resources to non-profit organisations and humanitarian causes where they can provide meaningful benefit.

Our commitment to responsible business practices is embedded within our governance framework and supported by our Human Rights Policy, Responsible Sourcing Policy, Code of Conduct and Anti-Corruption Guidelines. Together, these policies establish clear expectations for ethical behaviour, responsible decision-making and respect for internationally recognised human rights.

Through our due diligence processes, we seek to identify, assess and address potential adverse impacts relating to human rights, labour standards, environmental protection, anti-corruption and responsible business conduct. We continuously review and strengthen these processes to ensure they remain effective and aligned with evolving stakeholder expectations and regulatory requirements.

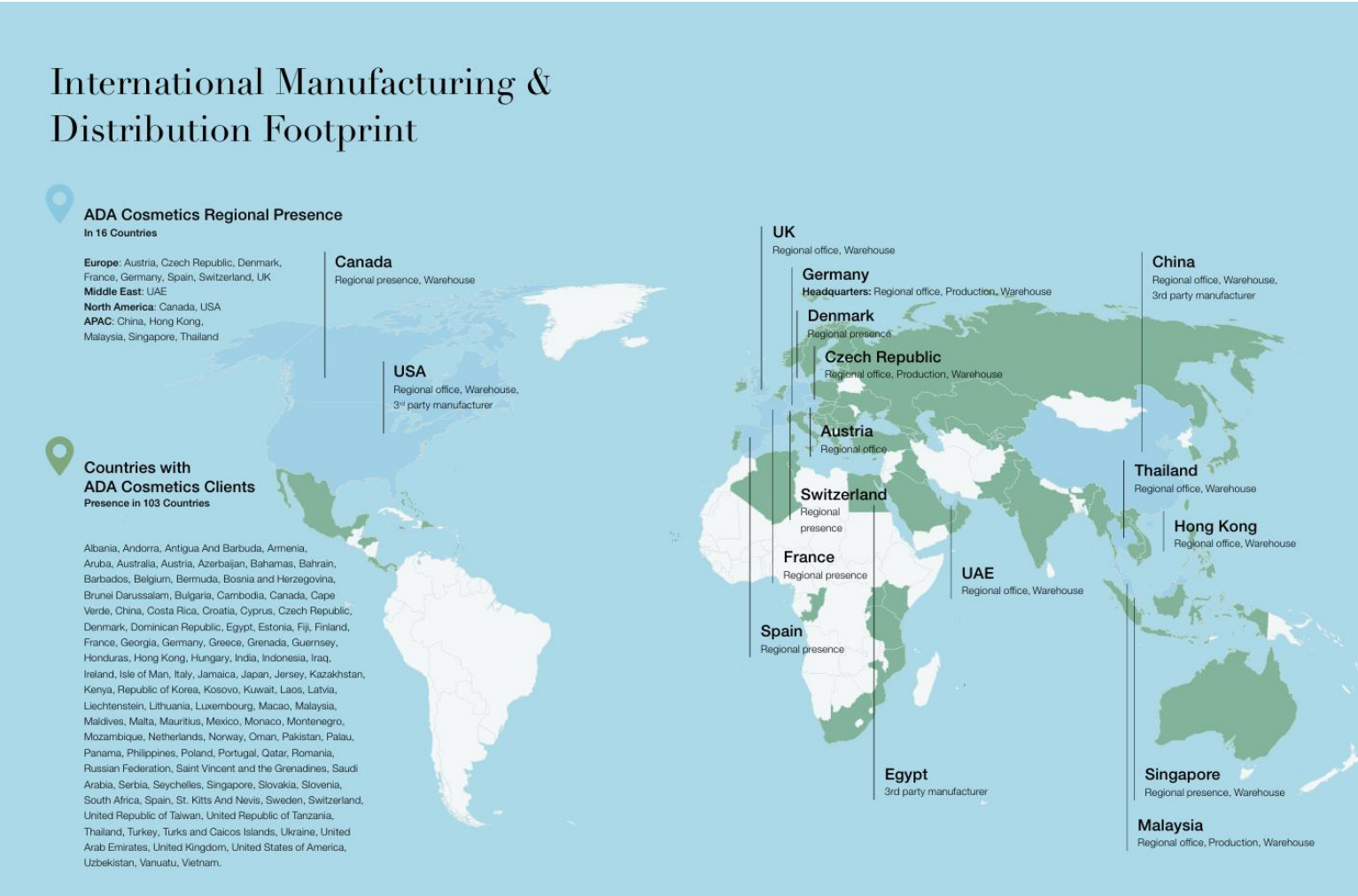
Our Business, Operations and Supply Chains

ADA Cosmetics International is a leading manufacturer and supplier of hotel cosmetics and guest amenities to the global hospitality industry, serving hotels, resorts, cruise lines and accommodation providers worldwide.

The Group employs more than 600 people and operates across more than 119 countries, serving more than 35,000 customers, generating annual revenues of more than £36 million.

Our operations are organised across five principal business regions, and we operate three manufacturing facilities.

Our global supply chain includes suppliers of raw materials, packaging components, manufacturing services, logistics providers and other business partners located across 23 sourcing countries.



Responsibility for supply chain governance is overseen by our Chief Financial Officer, supported by procurement and supply chain teams located in Germany, the United Kingdom, the United States, the Czech Republic and Asia. This structure enables close collaboration across regions and supports consistent implementation of our responsible sourcing and human rights commitments.

We are committed to providing a safe, inclusive and supportive working environment for all employees, agency workers and contractors. We expect the same commitment from those with whom we do business.

Governance, Policies and Standards

ADA Cosmetics International maintains a zero-tolerance approach to modern slavery, forced labour, child labour, human trafficking and all forms of exploitation.

Our commitment is supported by a framework of policies and procedures designed to promote ethical conduct, responsible sourcing and compliance with applicable laws and international standards.

Key policies include:

- Human Rights Policy
- Responsible Sourcing Policy
- Code of Conduct
- Anti-Corruption Guidelines
- Whistleblowing
- Supplier Onboarding and Assessment Processes

All employees where legally required are employed under lawful contracts and in accordance with applicable employment legislation. We are committed to providing fair terms and conditions of employment and safeguarding the rights and wellbeing of our workforce.

We expect our suppliers and business partners to uphold standards consistent with our own values and to comply with all relevant labour, employment and human rights legislation. Where concerns are identified, we work with suppliers to implement corrective actions and improve performance.

We are proud of our commitments, while we create beautiful products that are gentle to the planet.

Actions Taken During 2025

Throughout 2025, we continued to strengthen our approach to responsible sourcing, human rights due diligence and modern slavery prevention.

Right to Work Checks

We continually monitor and review our right to work checks; this helps us to verify that workers are legally entitled to work and that their employment arrangements are legitimate. While a right-to-work check alone cannot prevent modern slavery, it is one of several safeguards that can help identify and reduce the risk of labour exploitation.

Key reasons include:

1. Reducing vulnerability to exploitation
2. People without legal work authorisation may be more vulnerable to coercion, threats, debt bondage, or other forms of exploitation because they may fear reporting abuse.
3. Verifying work eligibility helps ensure workers are employed through lawful processes.
4. Confirming worker identity
5. Right-to-work checks require employers to verify a worker's identity and documentation.
6. This can help detect situations where someone is working under a false identity or where another person is controlling their employment.
7. Supporting ethical recruitment

8. Modern slavery often involves deceptive recruitment practices.
9. Proper onboarding and verification procedures help employers ensure workers have been recruited legitimately and understand their employment terms.
10. Meeting legal obligations

During recruitment and onboarding, employers may notice indicators of potential exploitation, such as:

- A worker being accompanied by someone who speaks for them.
- Workers unable to provide their own contact details.
- Signs that documents are being controlled by another person.
- Fearful or unusual behaviour.

Right-to-work checks are most effective when combined with other measures, such as ethical recruitment policies, worker welfare checks, manager training, whistleblowing channels, and supply-chain due diligence. ADA have created an Ethical Hiring Procedure training presentation; this will be shared with all hiring managers around the group during 2026.

Diversity, Equity & Inclusion

At ADA Cosmetics, we believe that fostering a diverse, equitable and inclusive workplace is fundamental to creating a culture of respect, dignity and opportunity for all employees. During 2025, we conducted a global Diversity, Equity & Inclusion (DE&I) survey across our organisation to better understand the experiences, perspectives and needs of our workforce. The survey provided valuable insights into areas where we are performing well, as well as opportunities to further strengthen our workplace culture and employee experience.

Listening to our employees is an important part of our commitment to responsible business practices and the prevention of modern slavery and human rights risks. A workplace where individuals feel respected, heard and able to raise concerns without fear contributes to greater transparency, employee wellbeing and protection from potential exploitation. By actively seeking employee feedback, we can better identify barriers to inclusion, promote equal opportunities and ensure that all employees are treated fairly and with respect.

Following the survey, we prepared a comprehensive feedback summary to share the key findings with our workforce. In 2026, we will use these insights to develop and implement targeted action plans aimed at addressing identified opportunities and driving continuous improvement. We

remain committed to building an inclusive workplace where every employee feels valued and empowered, and where our culture supports the principles of human rights, ethical employment and the prevention of modern slavery throughout our operations.

Responsible Sourcing

Our Responsible Sourcing Policy remains a key element of our supplier engagement process. In 2025, we updated this policy to include stricter requirements for onboarding new suppliers, as well as new standards for raw materials and packaging. We also invited our biggest suppliers to join the Sedex platform and share their SMETA (Sedex Members Ethical Trade Audit) reports with us. The SMETA report covers both human rights and the environmental risks that a company can face. This allows us to have a full overview of social and environmental compliance, and the best practices of our suppliers.

We also continue to engage openly with customers and hospitality partners, providing transparency regarding our sourcing practices and sustainability initiatives when requested. This includes working closely with our customers to ensure they are aware of our efforts to ensure safety comes first in all our practices and operations.

Risk Assessment and Due Diligence

During 2025, we continued to assess human rights risks across our operations and supply chains through a combination of Impact, Risk and Opportunity Assessments and Human Rights Risk Assessments.

These assessments considered geographic risks, sector-specific risks and supplier-related risks, enabling us to prioritise areas requiring additional due diligence and oversight.

The findings were reviewed by senior leadership and incorporated into our ongoing risk management processes.

Supplier Engagement

We continued to strengthen supplier oversight through our onboarding procedures and supplier evaluation framework.

We strengthened our supplier onboarding process, by including additional requirements for suppliers located in countries designated as high risk for human rights, which must be fulfilled before they can work with ADA Cosmetics. In 2025, we continued evaluating our biggest suppliers based on our supplier scorecard, which includes sustainability criteria such as calculation of Scope 1, 2, and 3 emissions, having SMETA audits, or Product Carbon Footprint available.

Our revised supplier scorecard incorporates Corporate Social Responsibility criteria, enabling us to assess supplier performance beyond traditional commercial measures and support continuous improvement throughout our supply chain.

Employee Awareness and Training

During 2025, additional employees completed modern slavery and human rights awareness training through the ADA Academy, our global learning platform.

Training materials are available in multiple languages and form part of the onboarding process for new employees, helping to ensure a consistent understanding of our ethical standards across all regions. We continue to further improve our training material allowing bespoke video creation to offer ongoing awareness around the group.

Human Rights Due Diligence Management System

In 2025 we developed a Human Rights Due Diligence management system. This serves as a comprehensive reference for our due diligence process, providing a structured and transparent framework for effectively managing risks related to our operations. It focuses on critical areas such as human rights, environmental stewardship, supply chain integrity, and legal compliance

Supply Chain Risk Monitoring

Following our membership of SEDEX, we continued to utilise risk assessment tools and supplier data to strengthen visibility across our supply chain and support risk-based decision making.

In 2025, we strengthened the resilience of our supply chain by pro-actively engaging suppliers that represent 80% of our total spend. By requesting SMETA audits from those operating in countries with elevated human rights risks and ensuring the closure of all identified non-compliance's, we advanced our commitment to safeguarding human rights and reducing potential risks at the start of our value chain.

Independent Auditing

After closing our SMETA CAPs in 2024, we started to work by end of 2025 on the SMETA 7.0 requirements as new SMETA Audits will be conducted in 2026 in all our production sites.

Speak-Up and Grievance Mechanisms

To ensure concerns can be raised safely and confidentially, we maintained both digital and physical reporting channels.

Employees can submit concerns anonymously through our whistleblowing platform, Compliance One or through physical complaint boxes located at sites where digital access may be limited. To further strengthen our processes, we conducted a survey in 2025 to gather employee feedback on the effectiveness and accessibility of our grievance procedure and whistleblowing system. The results helped us identify several areas for improvement.

Modern Slavery Awareness

Modern Slavery Awareness materials remain displayed across our facilities worldwide and are translated into local languages where required. These resources help employees recognise indicators of exploitation and understand how to report concerns through the appropriate channels.

We are supporting the following initiatives:

We are:

/ Supporting the protection of Rivers and Oceans from Plastic:



/ Supporting the b.waterMISSION project : AQUA PEARLS



/ Committed to protecting Ancient and endangered forests: canopy



/ Supporting Rainforest Conservation in Malaysia: Kuamut



/ Joining forces with partners from the Cosmetics Industry:



/ Committed to recycling waste with several partners:



Plasticbank

We are supporting The Ocean Cleanup in its work to rid the Ocean of plastic. We purchase coastal plastic from Plastic Bank, which goal is to prevent plastic waste entering the rivers and oceans.

AQUA Pearls Foundation

Social Projects by supporting the b.WaterMISSION project from the AQUA PERALS FOUNDATION, through a yearly 6km run. This project aims to raise awareness on water scarcity, provides safe drinking wells in African villages. In 2025, we managed to bring 700 persons joining this good cause, which contributed to the results of 10 000 people contributing and enabling the construction of 9 new taps in Africa.

Canopy

Protecting forest by supporting Pack4Good initiative from the NGO Canopy, ADA Cosmetics 'goal is to no longer buy conventional paper but instead only use recycled and FSC certified paper within our Global operations.

Kuamut

Supporting Rainforest conservation. This project is avoiding an estimate 543,049 tons if CO2e by protecting 83,381 hectares of rainforest in Sabah, Malaysia, preserving biodiversity as it protects vital habitants from endangered species.

Join us for a better future

‘Conscious choices, trip by trip’