

CODE OF CONDUCT



FOREWORD BY MANAGEMENT

Dear employees, dear business partners,

Building relationships with our customers, partners and employees that are founded on trust is crucial to the success of our company. We therefore all have a responsibility to preserve and strengthen this trust by behaving in a transparent and proper manner. That includes understanding and adhering to all applicable rules and legal regulations.

As managing director, I – together with the managers in the Group – am committed to our values and principles and firmly believe that they are key to successful cooperation and collaboration within our network.

I therefore ask you, as employees, as business partners: Let's work together to implement this code of conduct and not only deliver on our promise of high-quality cosmetics, but also make values like integrity and fairness even more of a priority.

Thank you for your support and commitment.



Dr. Peter Steck
Managing Director

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APPLICATION OF THE CODE OF CONDUCT

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Preamble & central principles

The code of conduct is a guideline for the entire company, as well as our business partners, and applies equally to every single employee of the JDA cosmetic group and, of course, all associated companies:

JEAN D'ARCEL GmbH,
JDA GmbH & Co. KG,
CARECOS Kosmetik GmbH,
JEAN D'ARCEL Cosmétique GmbH & Co. KG.

Specifically, it is aimed at the management team, managers and all employees.

We also expect our suppliers, including service providers, to respect and abide by the guidelines defined in this document.

The code of conduct reflects our commitment to the defined values and principles and demonstrates our responsible conduct towards our business partners, customers and employees.

We undertake to comply with applicable laws and regulations, and are guided by the following internationally recognised frameworks:

- International Bill of Human Rights:
The International Covenant on Economic, Social and Cultural Rights (ICESCR) and the International Covenant on Civil and Political Rights (ICCPR).
- ILO Core Labour Standards
- MNE Declaration
- UN Global Compact
- OECD Guidelines

Responsibility of company management

The JDA cosmetic group believes it has a duty to act in an economically, socially and environmentally responsible manner. The company strives to conduct its business competently on an ethical and moral basis and engage in fair competition in all markets. This includes compliance with the applicable laws and the acceptance of bans on cartels/restrictions on competition.

We do not wish to create any improper advantages for ourselves in relation to customers, suppliers or competitors.

CORPORATE CULTURE

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Our values

Our company values form the basis of how we work together and with others. These values are implemented and developed with the support of our employees across all areas of the company.

Our principles of conduct and leadership highlight the issues that are particularly important to us in our day-to-day work and define how we implement a common leadership culture. The principles provide specific suggestions for the conduct that is expected from managers but also from all employees.

Employees are expected to abide by these principles in their day-to-day interactions with one another, as well as with customers and partners. With our team spirit and our constructive cooperation, we are ensuring the long-term success of the JDA cosmetic group.

That is why it is important to us that every single person takes responsibility. If mistakes are made, we work together to find a solution and ensure that the problem is permanently resolved rather than looking for someone to blame.

Internal communication

We make sure that employees are regularly informed about what is happening in the company and that news is communicated openly, transparently and promptly.

We do this in a variety of ways, such as at the quarterly information events held by company management, the intranet where regular updates are posted and documents are shared, and via Beauty Inside, an internal company magazine by employees for employees. Important topics are also discussed in monthly management meetings at department head level and communicated as appropriate.

OUR VALUES

-  APPRECIATING INDIVIDUALITY
-  ASSUMING RESPONSIBILITY
-  EXPERIENCING ENTHUSIASM
-  EARNING TRUST
-  LIVING CUSTOMER ORIENTATION

CONDUCT AND LEADERSHIP PRINCIPLES

WE THINK
ENTREPRENEURIALY
AND ACT
RESPONSIBLY



WE FIND CREATIVE
AND INNOVATIVE SOLUTIONS
FOR OUR CUSTOMERS



WE ARE OPEN TO CHANGE
AND WILLING TO LEARN



WE APPROACH
TASKS WITH AN OPEN MIND
AND FULL OF OPTIMISM



WE ARE PROACTIVE
AND IMPRESS WITH
RESULTS



WE SUPPORT ONE ANOTHER
AND WORK TRANSPARENTLY



Management development

Managers are responsible for the successful implementation of the corporate strategy in their area, as well as the satisfaction and development of their employees. By providing regular training and coaching, the JDA cosmetic group ensures that managers are well equipped to handle this responsibility and advocate a common leadership culture. Regular „Leadership Lounges“ provide an opportunity for managers to share experiences and ideas.

Career management and professional development

Our employees are important to us. We want to make sure that their uniqueness is recognised and encouraged. One key way in which we do this is through regular feedback meetings between employees and managers. During these meetings, development needs and opportunities are discussed and personal support is initiated with specific training or further education. To support joint development, the JDA cosmetic group advocates open and honest collaboration. Another of our top priorities is to ensure that we are supporting our employees' lifelong learning and offering them appropriate opportunities in this respect.

Embracing customer focus

We are fair and honest in our interactions with customers and business partners. We take careful note of the wishes, requirements and expectations of our customers and business partners in the relevant departments (Sales, Marketing, R&D) to ensure the prompt, targeted implementation of our products. Our top priority is to build a lasting, stable relationship with our business partners on a foundation of trust. We expect our partners throughout the supply chain to demonstrate the same customer focus.

Compliance with applicable laws

We require our managers to familiarise themselves with the laws, regulations and rules that are relevant to their area of responsibility and to adhere to them at all times. In particular, managers are responsible for compliance with the code of conduct. The business practices of our business partners and their suppliers must also comply with the applicable regulations. This is particularly relevant to the Export and Supply Chain Management departments, as well as in the context of payment and capital transactions. We expect our suppliers and service providers to adhere to our ethical standard, including the principles of the Global Compact.

LABOUR AND HUMAN RIGHTS

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Employee health and safety

Safety is important to us. Our greatest concern is to ensure that every single person is working in a safe and healthy environment.

- We have clear health and safety standards, which are subject to a continuous monitoring and adaptation process.
- We prohibit the dangerous consumption of alcohol and drugs and the misuse of other substances in the workplace.
- Our JDA cosmetic group employees are jointly responsible for the protection of people and the environment and for ensuring that the site where we operate is safe and liveable.

We place particular value on the safety of our employees, which is why we provide them with protective clothing and training in workplace safety and hygiene. All unsafe incidents are reported by employees to management or the HR department. We support the health of our employees with regular offers such as health days, vaccination offers and physicals by the company doctor, as well as health courses.

Combating modern slavery

Our company is committed to the highest ethical standards and to upholding human rights. Modern slavery, including forced labour, human trafficking and any form of exploitation, has no place in our business. We ensure that all our employees, regardless of their type of employment (including part-time), receive the same company benefits and social services. We also ensure that at least the statutory minimum wage is paid for all employment relationships. In doing so, we are guided by the principles of the International Convention on Economic, Social and Cultural Rights (ICESCR), which enshrine key labour and human rights, including the right to fair working conditions (Articles 6 and 7), social security (Article 9) and an adequate standard of living (Article 11). Compliance with these standards is a matter of course for our company and is also expected from our business partners and suppliers.

Protection against child and forced labour

The JDA cosmetic group is committed to ensuring that the Universal Declaration of Human Rights is respected and adhered to within the company and across the supply chain.

We emphatically reject child labour and forced labour without exception and do not employ young people under the relevant legal minimum age. We expect the same of our business partners.

Prohibition of discrimination

All forms of discrimination are prohibited as a matter of principle, whether on the basis of nationality, ethnicity, age, gender, sexual orientation, marital status, disability and illness or ideology. New hires, promotions and other decisions regarding employees are always made free from any discrimination.

Diversity, equality and inclusion

We treat everyone with appreciation, respect and fairness. It is important to us that every single employee feels like they belong in the company. We honour inclusion, diversity and equality by catering to the needs of each individual person. We live up to these values internally with employees, in our network with customers and partners and externally with consumers.

We adhere to all anti-discrimination laws. If employees violate these principles, they must expect consequences, which are determined by the nature of the offence.

Fair working conditions

The safety and well-being of our employees are our top priority.

All employees receive a fair salary for their work in line with the German "General Equal Treatment Act" (AGG), which meets or exceeds the local legal minimum standards or the prevailing applicable industry standards. The same goes for the application of work regulations and the implementation of the rules therein for maintaining law and order. Furthermore, we provide our employees with several benefits, such as for example regular social events, health actions or monthly credit on the SpenditCard.

ETHICS

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Ecology as part of our sustainability strategy

The protection of people and the environment and the conservation of resources are fundamental company objectives. The well-being of our customers is at the heart of our company philosophy, which is why we use effective and exclusively high-end ingredients. We consciously avoid critical ingredients. As part of a global company, we work to make our business as sustainable as possible and aim to keep the carbon footprint of our products as low as possible. That is why our energy comes from renewable sources and in our environmental report we present figures, data, and facts relating to our environmental impact.

Corruption and conflict of interests

We behave impeccably in our business relations with others, adhere to the applicable laws and relevant regulations against corruption, data abuse, bribery and fraud, and avoid conflict of interests. Employees of the JDA cosmetic group are strictly prohibited from offering money or other gifts of value to officials or other public servants as a gift.

A conflict of interests exists if an employee's personal, social, financial or political interests overlap with the company's interests. Any potential conflict of interests should be disclosed to the respective manager. For example, secondary employment in the form of services or consulting for third parties should be disclosed to the manager if there is a business relationship with the JDA cosmetic group or a competitor.

Possible conflicts of interest and cases of corruption must be reported anonymously and securely via LegalTegrity, with guaranteed and direct processing.

Fair competition

We are completely committed to fair competition and adhere to the laws prohibiting restrictions on competition in all countries where the JDA cosmetic group operates. As the legal assessment depends on the relevant laws and market conditions and can pose a challenge in individual cases, the responsible Legal department must be consulted in case of doubt.

The JDA cosmetic group attaches great importance to transparency and prudence in matters

concerning donations and sponsorship. Employees are made aware of the issue via channels such as the employee magazine. We ensure that all donations and sponsorship activities comply with the relevant laws. Furthermore, they are voluntary and nothing is expected or demanded from the recipients in return. Some of our donations are made with the aim of supporting developing countries, in particular countries that are relevant to our company. Other recipients include associations and charitable organisations in the region, for example. Donations with political intentions are prohibited.

Information security and data protection

It is important to us that the cosmetic products manufactured, the work equipment used and the intellectual property belonging to the company are handled carefully and responsibly. We require our employees to protect trade and business secrets. Confidential information and documents must not be disclosed or otherwise made accessible to third parties without authorisation, unless permission has been granted to do so or it involves public information.

All business information of our partners and their company secrets are treated sensitively and confidentially. Required documents are created, stored and, where applicable, destroyed after the cooperation ends in the proper manner. We expect the same of our business partners.

Furthermore, it is important to us that personal data is carefully and sensitively handled. Legally secure data collection and processing (in accordance with data protection law) is crucial to sustainable and transparent cooperation with our customers. We therefore expect our employees to familiarise themselves with the applicable legal requirements within their area of responsibility. Only the data that is necessary for the relevant purpose is collected, and this data is stored only for as long as legally required. We expect our suppliers to do the same.

BREACHES OF THE CODE OF CONDUCT

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Point out violations

We trust that all employees will act in accordance with the code of conduct. Nevertheless, we encourage employees to alert us to any potential breaches and raise any concerns they may have about potentially inappropriate conduct. A failure to abide by the code of conduct may damage the trust-based relationships we have built up with customers and partners, and in doing so expose the company as a whole to risk. It is therefore important for us, as a company, to be able to respond to any potential breaches promptly.

Any concerns in this regard can be discussed with the relevant manager or reported directly via LegalTegrity. Reports via LegalTegrity are anonymous and secure.

Violations can be reported via LegalTegrity either online or by phone:

- Via the internet or smartphone:
<https://app.whistle-report.com/report/a582deae-d871-4a0a-8bdd-64f6a3d45411>



- By phone: +49 800 3800 999
(Mon – Fri: 9 am – 5 pm)



