

Code of Conduct

for Suppliers and
Business Partners



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1 | General

The following Code of Conduct is intended for our suppliers and business partners who act for, together with, or on behalf of BHI Beauty & Health Investment Group Management GmbH or an affiliated company of the BHI Group (together "BHI"). **BHI** is an affiliated company of Ströer SE & Co. KGaA.

The Code of Conduct described below is binding for our suppliers and business partners. Compliance is the fundamental basis for a trusting and long-term business relationship between us and our suppliers and business partners

All those involved in our supply relationships have a responsibility to society, the state and the economy, which we must fulfill together.

We expect our suppliers and business partners to comply with the legislation that applies to them and to observe internationally recognized environmental, social and corporate governance (ESG) standards.

Our approach is based in particular on the

- Principles set out in the United Nations Global Compact,
- OECD Guidelines for Multinational Enterprises,
- United Nations Guiding Principles on Business and Human Rights, and
- International Labor Organization (ILO) core labor standards.

We reserve the right to terminate any contractual relationship with a supplier or business partner if the supplier or business partner violates the principles laid out in this Code of Conduct, fails to take action to remedy such violations or systematic violations are evident.

2 | Labor and human rights

2.1 Respect for fundamental and human rights

We require our suppliers and business partners to respect the applicable human rights and fundamental rights of the countries in which they operate and to ensure a fair working environment. In addition, they must combat violations of rights, discrimination and disadvantages as part of their human rights due diligence.

2.2 Working hours, wages and other benefits

We assume that suppliers and business partners comply with the applicable laws on working hours, remuneration and other benefits.

Suppliers and business partners are to offer their employees pay without delay and in accordance with the statutory minimum wage or the higher industry average for the country.

2.3 Fair treatment and equal treatment

Our suppliers and business partners do not tolerate any discriminatory behavior towards their employees or applicants on the grounds of ethnic origin, nationality, gender, pregnancy or parenthood, marital status, age, disability, religion or belief, sexual orientation or any other grounds covered by a ban on discrimination.

Our suppliers and business partners treat their employees with respect and dignity, without any harassment, bullying or intimidation.

2.4 Prohibition of child and forced labor

We do not accept any kind of child labor in our supply chain. Therefore, our suppliers and business partners are not allowed to hire employees who are less than 15 years old. In countries that fall under the developing country exception in International Labor Organization (ILO) Convention No. 138, the minimum age may be reduced to 14. The respective valid age limit applies.

Just as we do not accept or tolerate child labor, we do not accept or tolerate any form of modern slavery, bonded labor, forced labor or human trafficking in our supply chain.

2.5 Freedom of association and assembly

Our suppliers and business partners respect their employees' right to freedom of association and assembly as well as collective bargaining within the framework of the applicable laws and ILO conventions.

2.6 Occupational health and safety

Suppliers and business partners are to assume and guarantee responsibility for their employees' health and safety in the workplace. Risks are to be contained by prevention and the right precautionary measures in order to counteract accidents and occupational diseases as best as possible.

To achieve this goal, suppliers and business partners are to provide regular training to employees to a sufficient extent and in accordance with national laws. An appropriate occupational safety management system is to be established and applied.

3 | Governance

3.1 Abstention from criminal acts

Our suppliers and business partners must comply with national and international law. We do not accept any criminal acts by our suppliers and business partners and reserve the right to take appropriate action in such a case and to terminate the collaboration, if necessary.

3.2 Anti-corruption, money laundering, kickbacks, bribery

We do not tolerate any form of bribery or corruption, including facilitation payments. We expect our suppliers and business partners to comply with applicable national and international legislation. This includes, in particular, respect for the principles of the UN Convention against Corruption. We require our suppliers and business partners to have established processes and controls in place, as well as appropriate regulations, to prevent any kind of bribery and corruption.

We take compliance with money laundering laws, in particular the German Money Laundering Act (GWG), very seriously and expect the same from our suppliers and business partners. Our suppliers and business partners must therefore clearly disassociate themselves from money laundering and terrorist financing. They must also have implemented appropriate prevention measures that take both national and international laws and regulations into account.

3.3 Fair competition and antitrust

Suppliers and business partners are to comply with applicable laws and regulations on free and fair competition. They are to refrain from all abusive or unlawful acts and practices that could restrict or harm competition. These include, for example, collusion, abuse of a dominant position, exploitation of a customer's or supplier's dependence, the division of customer or supplier territories, or anti-competitive boycotts.

3.4 Data protection and data security

The protection and security of personal data, i.e. information that allows conclusions to be drawn about specific or identifiable natural person(s), is our top priority. We therefore expect our suppliers and business partners to only use

personal data in accordance with all applicable data protection regulations – in particular the European Union’s General Data Protection Regulation (GDPR). Confidentiality and IT security are particularly important for the processing of personal data.

The measures for the protection of personal data at the supplier’s and business partner’s must be suitable in each case to achieve a level of protection appropriate to the sensitivity of the respective data.

If, personal data is processed by suppliers and business partners on our behalf as part of the supply relationship, a corresponding order processing agreement (OPA) must be concluded with us to work together.

3.5 Conflict of interest

Business decisions are to be made exclusively on a professional and factual basis. Where conflicts of interest exist between the supplier and business partner and us, these must be disclosed to the acting parties without delay.

3.6 Tangible and intellectual property

Any form of fraud or economically damaging offenses (e.g. fraud, embezzlement, theft, embezzlement, tax evasion or money laundering) is prohibited, regardless of whether it damages BHI company assets or third-party assets.

Intellectual property is defined as all products of intellectual work, regardless of their commercial value. These include literary works, music, films, television programs, graphic works and software. Intellectual property is protected by law (e.g. by copyright, trademark, design or patent rights) as trade secrets or know-how.

Infringement of protected intellectual property includes, for example, the performance, distribution or exhibition of copyrighted works without appropriate permission and the unauthorized reproduction or distribution of copies of intellectual property, whether in physical or digital form.

The protection of intellectual property is of vital importance to our business policy as a manufacturing company and is therefore equally expected of our suppliers and business partners.

3.7 Export controls and economic sanctions

Our suppliers and business partners strictly observe compliance with all applicable laws for the import and export of goods, services and information as well as

national and international payment transactions. Suppliers and business partners must observe any existing sanctions and embargoes when conducting any business activities.

3.8 Protection from retaliation and whistleblowing

We expect all suppliers and business partners to immediately report any suspicious acts or violations of this Code of Conduct (see also section 8)

Intimidation and reprisals against the person reporting the actual or suspected misconduct in good faith will not be tolerated by us or by our suppliers and business partners. Our suppliers and business partners also give their employees the opportunity to report potential compliance violations in confidence.

4 | Environment

4.1 Environmental management

Our suppliers and business partners clearly commit to their duty of care towards the environment and the careful use of natural resources. Furthermore, the applicable local, national and/or international environmental protection, health and safety regulations, including fire protection, which relate to the supplier's and business partner's respective field of business must be complied with.

Environmental impacts resulting from business activities are to be avoided or minimized as far as possible. An appropriate environmental management system, including corresponding targets, is to be established and applied to monitor, record and reduce environmental pollution in the company.

4.2 Product-related environmental impact

Our suppliers and business partners are to ensure that their products are as safe and environmentally compatible as possible in development, production, use, transport and disposal.

The products must comply with applicable legal requirements for product quality and safety (see also section 5). Negative impacts on the climate, biodiversity or water resources are to be systematically reduced. This includes, in particular, the careful and efficient use of natural resources.

4.3 Operational environmental impact

Negative environmental impacts from operations, such as air, noise or greenhouse gas emissions, are to be avoided or minimized by our suppliers and business partners wherever possible.

Furthermore, humans and nature must be protected from hazards arising from manufacturing and disposal processes. Appropriate safety precautions must be taken for this in compliance with the statutory requirements. The statutory labeling obligations and disposal regulations must be observed for disposal and recycling.

5 | Product quality and safety

Our suppliers and business partners ensure that all products and services meet the contractually defined criteria upon delivery. All applicable product safety-related regulations and specifications for quality and safety are complied with in accordance with the intended use.

6 | Compliance with requirements

As the minimum principles of this Code of Conduct for Suppliers and Business Partners are to be complied with throughout the entire value creation process, our suppliers and business partners shall point out this Code of Conduct for Suppliers and Business Partners to third parties who they use in their business activities for BHI (e.g. subcontractors, consultants) and shall work towards compliance with this in their contractual relationship with BHI.

We reserve the right to verify this Code of Conduct through appropriate measures at the supplier's and business partner's. This can take the form of questionnaires, assessments or on-site supplier audits, for example. On-site audits are announced beforehand and carried out together with supplier and business partner representatives, in compliance with the applicable law, including data protection regulations. Suppliers and business partners must disclose the information required for the audit and assessment.

Any deviations from this Code of Conduct must be corrected by suppliers and business partners immediately and in consultation with us. The measures are to be implemented independently by the suppliers and business partners without any costs arising for us.

7 | Legal consequences of violations

Any violation of this Code of Conduct may be grounds for legal action, especially where there are acute risks to the environment and people. In any case, suppliers and business partners are to immediately take credible and verifiable action to remedy any existing violations and prevent any in future.

Such steps may be waived if suppliers and business partners credibly assert and can prove that they have taken immediate countermeasures to prevent future violations.

8 | Notification of violations

Violations of our Code of Conduct, of national or international laws, and other compliance violations (also in connection with the supply chain) can be reported through our central compliance hotline, which is available to all companies belonging to Ströer SE & Co. KGaA.

compliance.stroeer.de

The compliance hotline can be contacted both in writing and by phone and in many languages. Where legally permissible, there is also the option of anonymous reporting.

All communication through the compliance hotline is encrypted and is classified as strictly confidential by us to protect the person reporting the violation.

9 | Contact

If you have any questions or suggestions regarding the **BHI Code of Conduct for Suppliers and Business Partners** or the **Ströer** Code of Conduct, please do not hesitate to contact our strategic purchasing department.

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By signing and returning this document, the supplier and business partner assures that they are aware of all the principles contained in the **BHI Group Code of Conduct for Suppliers and Business Partners** and that they undertake to comply with them.

Company name and address:

Signatory name:

Position:

Place, date:

Company stamp:

Signature: