

# Code of conduct

for business  
partners

cosnova GmbH (as well as the affiliated companies within the meaning of sections §§ 15 AktG et seq., hereinafter jointly also referred to as "cosnova") is a family-owned company and has been successfully developing cosmetic products for more than twenty years - always with the vision to enable everyone in the world to feel more beautiful at any time.

We value loyalty - loyalty to our employees, our business partners and our locations. We take responsibility, and we are committed to keeping high standards in ethics, fairness and transparency. We expect the same from our business partners.

We would like to use our collective strength together with you as a trusted business partner to make a mark on social change with a sustainable supply chain.

cosnova's Code of Conduct for Business Partners ("CODE OF CONDUCT FOR BUSINESS PARTNERS") defines the principles and requirements of cosnova for all its business partners, including agents, sub-contractors, and suppliers of goods and services. We expect all business partners to comply with these principles and requirements.

We see compliance with this CODE OF CONDUCT FOR BUSINESS PARTNERS as a form of mutual respect towards intensifying our mutual business relationship. As we also do, we expect our business partners to establish and maintain an ongoing, risk-based human rights and environmental due diligence process appropriate to its size and circumstances to identify, prevent and mitigate human rights and environmental impacts.

*Let's work together for a  
better present and future!*

## Compliance with laws, regulations and policies

We expect our business partners and their subcontractors to comply with all applicable national and international laws and regulations, including but not limited to, human rights laws, health and safety regulations, labor protection laws, equal opportunities regulations, environmental laws, anti-bribery and anti-corruption laws, anti-money laundering laws, trade sanctions laws, tax laws, data protection and antitrust laws. We expect to be informed in writing as soon as business partners, their employees or other persons working for or on behalf of them are publicly accused or convicted of any such violations insofar as this is permissible under applicable law.

## Fair competition and antitrust

We expect our business partners to work in fair competition and according to all applicable national and international antitrust laws.

When interacting with competitors or other third parties, we expect our business partners not to enter any understandings or agreements with competitors or other third parties that prevent, restrict or distort competition, such as fixing prices or sharing markets.

## Anti-bribery and Anti-corruption

We expect our business partners to comply with national and international laws prohibiting corruption and bribery. Business partners must not make, offer, promise, or grant, either directly or indirectly, any payment or anything else of value (such as deposits, loans, favors, gifts, or other advantages) to public officials/government officials, political parties, business partners, customers, suppliers or other third parties to influence any decision or to obtain any improper benefits. At the same time, no one who works for the business partner or on its behalf is allowed to solicit or accept any payments or anything of value from public officials/government officials, political parties, business partners, customers, suppliers or other third parties to influence any decisions or to obtain any improper benefit.

We are committed to conducting our business in accordance with our [Code of Conduct for Business Partners](#) at all times.

## Trade sanctions

Trade sanctions laws can impede cosnova's ability to do business with certain countries, companies or individuals. We expect our business partners to comply with all relevant national and international trade sanctions laws. Specifically, we expect our business partners not to do any business with companies and individuals in violation of applicable trade sanctions laws. Furthermore, we expect our business partners not to import or source any goods or materials from countries that are subject to trade sanctions or import restrictions.

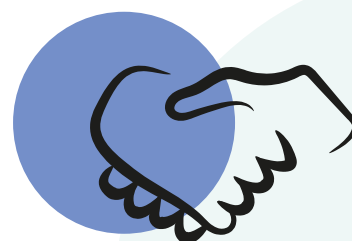
## Conflicts of interest

We expect our business partners to avoid any financial or personal conflicts of interest in the business relationship with cosnova, and, if such conflicts of interest exist, to disclose them fully and immediately. Conflicts of interest may occur, for example, when employees of our business partners hold shares in any competitor of cosnova or when any personal ties to competitors or other third parties exist.

## Confidentiality and data protection

We expect our business partners to comply with all relevant data protection laws and statutory confidentiality regulations to protect personal data of customers, suppliers, other third parties or individuals involved in the business relationship between the business partner and cosnova.

We expect our business partners to deal with confidential information and data with due care and discretion and to ensure its protection. Any confidential data or information may only be used for the purpose of processing the respective order, and only passed on to others to the extent necessary for this purpose. Our business partners are expected to ensure that any employees with access to such confidential data or information maintain confidentiality, and document this for us at cosnova on request. If in doubt, we ask our business partners to consult us before passing on any confidential data or information.



## Subcontractors

In relation to work conducted for cosnova, our business partners are expected to not employ or engage any subcontractors without the prior written consent of cosnova. Each business partner shall communicate this CODE OF CONDUCT FOR BUSINESS PARTNERS to its subcontractors and use best efforts to achieve subcontractors' agreement with and adherence to the principles and requirements of this CODE OF CONDUCT FOR BUSINESS PARTNERS.

## Environmental practices

Our business partners shall comply with all environmental regulations towards preventing adverse effects on the environment, natural resources, and biodiversity and avoid human rights related risks of environmental practices. cosnova aims to minimize the environmental impact of its products, e.g., by reducing the use of virgin plastic, enhancing the recyclability of our packaging, and constantly monitoring the impact of our ingredients on the environment. Our business partners shall also avoid and continuously reduce the environmental impact of resource and energy consumption, emissions of greenhouse gases and air pollutants, water consumption, application of soil and water and waste, to preserve biodiversity and to promote the circular economy.

Any harmful soil change, water and air pollution, harmful noise emission or excessive water consumption that significantly impairs the natural bases for the preservation and production of food, denies a person access to safe and clean drinking water, makes it difficult for a person to access sanitary facilities or destroys them or harms the health of a person must be avoided. Also, unlawful eviction or unlawful taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person must be avoided.

## Climate action

cosnova has set itself science-based targets (SBTs) aiming to reduce our emissions in line with limiting the global temperature rise to 1.5°C above pre-industrial levels. It is critical that we partner with suppliers who have signed up to SBTi or have similar publicly announced carbon reduction targets. Therefore, we expect our business partners responsible for a substantial part of our footprint to share their corporate carbon footprint as well as carbon reduction measures on an annual basis with us. This will enable us to work closely together to achieve our carbon reduction ambitions.

## Respect for animal life

Our business partners shall not treat animals in any cruel way; in particular, our business partners shall not perform animal experiments in testing raw materials or products for cosnova, and shall not commission business partners, customers, suppliers or other third parties to do so.



## Employment practices

We expect our products to be manufactured in humane conditions in compliance with all applicable laws, including but not limited to applicable human rights, health, labor and safety laws and the International Bill of Human Rights as well as the ILO Core Labor Standards. We have listed the appropriate minimum principles and requirements below; where national law and international standards contradict or national laws fall short of international standards, business partners shall aim to uphold the standards that provide the greater protection to people.

### FORCED LABOR AND HARASSMENT, DISCIPLINING EMPLOYEES

Our business partners shall not use forced labor, slavery, slavery alike practices or human trafficking in any form. We expect our business partners to interact with their employees cooperatively, respectfully, fairly, and professionally. There must be no inhumane or degrading treatment, physical abuse or discipline, threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation including a hostile or offensive work environment or wage deductions as a disciplinary measure. All disciplinary measures shall be documented in writing.

### CHILD LABOR

cosnova takes the issue of child labor extremely seriously. We do not tolerate any child labor as defined in the ILO Conventions 138 and 182 in the supply chain of our products and see it as our duty to ensure that no child labor is involved in the mining of our raw materials. The minimum age for employment shall not be below the age at which compulsory education ends and never less than fifteen years of age. Our business partners shall take the appropriate measures to prevent the employment of any person under the legal minimum working age. This also means that goods to be manufactured shall not be made in home-working environments.

### PROTECTION OF YOUNG WORKERS

Young workers shall be protected from economic exploitation or any work that could impair their training and/or endanger their health or physical, mental, spiritual, moral or social development. Young workers shall not work more than eight hours a day or in night shifts.

### REMUNERATION

Our business partners shall pay statutory benefits for their employees, as well as adequate remuneration sufficient to allow them and their families a reasonable quality of life. Any minimum wages shall be honored; paid leave shall be provided. Wages shall be paid regularly, on time, in full, and in legal tender. Written and understandable information about wage shall be provided.

### WORKING HOURS

We expect our business partners to adhere to applicable national laws on working hours, holidays, and overtime. The normal weekly working hours shall not exceed fortyeight hours in manufacturing products for cosnova, and overtime shall be limited to twelve hours a week even if law allows more. Workers shall not be forced to work overtime, and overtime shall remain the exception and be compensated with time off. Workers shall be given breaks every working day, as well as one day off per week unless specific operational requirements require otherwise.

### HEALTH AND SAFETY AT WORK

Our business partners shall provide a safe, clean, and healthy workplace in compliance with all legal requirements; the workplace shall have written safety and health standards available. An appropriate workplace usually involves drinking water, clean toilets, clearly marked and freely accessible emergency exits, first-aid kits, fire extinguishers, proper ventilation and adequate lighting. Our business partners shall provide these fittings and equipment at no cost to their employees. This shall also apply to employees' residential accommodation if provided by the business partner. Suitable measures shall be taken to prevent potential accidents or damage to health.

Our business partners with raw materials supply chains shall pay special attention to their due diligence efforts, in particular on transparency and traceability and especially in the context of mineral supply chains due to their greater impact on people.

## EQUAL OPPORTUNITIES

Our business partners' recruitment and employment practices, including salaries, benefits, promotion, termination, and retirement shall adhere to the principle of equal opportunities, focusing on individual skills, not ethnic or social background, nationality, skin color, religion, sexual orientation, gender, age, disability, or political beliefs as long as these political beliefs are based on democratic principles and tolerance towards dissidents or any other characteristic of an individual which is subject to legal protection.

## FREEDOM OF ASSOCIATION

Our business partners shall respect the rights of workers to freedom of association and collective bargaining. Those refer to rights of workers defined in the ILO Conventions No. 87 and No. 98 and must not be restricted or obstructed in any way. In countries with restricted freedom of association and collective bargaining rights, our business partners shall not hinder the development of alternative means of employee association and bargaining.

## DUTY OF DISCLOSURE

Our business partners shall communicate these EMPLOYMENT PRACTICES to their workers in the appropriate way.

## RIGHT TO COMPLAINT

Our business partners shall establish a system that allows employees to lodge anonymous complaints without fear of reprisal against employees disclosing violations of legal requirements or provisions in this CODE OF CONDUCT FOR BUSINESS PARTNERS. Employees shall not be prevented from making such disclosure.

## EMPLOYMENT AGENCIES

All the above listed EMPLOYMENT PRACTICES also apply to temporary workers of employment agencies. Our business partners shall exercise particular care in the direct and indirect use of employment agencies.

## Audits and monitoring

cosnova reserves the right to check, through an independent auditor, the compliance of any business partner as well as its subcontractors with these principles and requirements at any time during an existing business relationship. These checks can be conducted during business hours on site at any location where goods or services are performed. Auditors must be given access and must be permitted to move freely and unaccompanied throughout the site as requested. They may approach any individual employee unsupervised and must not be hindered in the performance of their duties in any way. Business partners must ensure that any subcontractors give the auditors full access to all production locations, installations, the relevant data and. Business partners, and their subcontractors must cooperate in remediating any non-compliances that are discovered through the audit process.

## Consequences of non-compliance

cosnova reserves the right to cancel existing contracts without notice, to cancel orders without compensation, and/or end our business relationship with any business partner on becoming aware that this business partner has been failing to comply with the provisions and requirements in this CODE OF CONDUCT FOR BUSINESS PARTNERS or when not providing sustainable improvement despite a request to do so within a reasonable period.

## Reporting a violation

In case of a violation of this CODE OF CONDUCT FOR BUSINESS PARTNERS, statutory provisions or internal policies at or by cosnova, a report can be filed through the cosnova whistleblower system (<https://cosnova.integrityline.com>). cosnova will ensure that every report is handled with the appropriate diligence.

### CONFIRMATION OF RECEIPT AND ACKNOWLEDGEMENT

We hereby confirm

- 1 Receipt and acknowledgement of the CODE OF CONDUCT FOR BUSINESS PARTNERS, version 3/2024; our guarantee that we shall meet the obligations in their entirety in addition to the obligations in supply contracts to cosnova.
- 2 Effective communication of this CODE OF CONDUCT FOR BUSINESS PARTNERS to all our employees, agents, subcontractors, and suppliers with whom we serve cosnova, for implementation of the CODE OF CONDUCT FOR BUSINESS PARTNERS exercising reasonable care.
- 3 Acknowledgement that compliance with this CODE OF CONDUCT FOR BUSINESS PARTNERS is a prerequisite for business relations between cosnova and us as a business partner.

NAME

COMPANY NAME



PLACE, DATE

SIGNATURE BY AUTHORISED SIGNATORY

Agreement must be signed by authorised signatory.

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