



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 fifteen years – always with the vision to enable every woman in the world to feel more beautiful at any time.

..... Our company values of passion, courage, confidence, reliability, openness and accountability help us move closer towards this vision every day.

..... We also 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.

..... We are sure that you will not find anything new in the topics we have listed below, and that you have already put them into practice or that you are already working with us to do so in the future.

COSNOVA' S CODE OF CONDUCT FOR BUSINESS PARTNERS

..... 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, subcontractors, and suppliers of goods and services. We therefore expect all business partners to comply with these principles and requirements.

..... We regularly review, refine, and update this CODE OF CONDUCT FOR BUSINESS PARTNERS. We expect you to be ready and open to potential changes that we will always promptly and transparently communicate to you.

..... We see compliance with this CODE OF CONDUCT FOR BUSINESS PARTNERS as a form of mutual respect towards intensifying our mutual business relationship. 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, labour 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.



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, favours, 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.

Nothing of value at all shall be made, offered, promised or granted either directly or indirectly to any public officials/government officials.

We need our business partners to immediately inform us in writing and in accordance with applicable law as soon as they become aware of any actual or suspected form of bribery or corruption.

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.

If business partners suspect any actual or suspected violation of antitrust laws, we expect them to immediately inform us in writing and in accordance with applicable law.

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.

We need our business partners to immediately inform us in writing and in accordance with applicable law if they become aware of any activity that may be in violation of relevant trade sanctions laws.

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.

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 protect the environment and comply with all environmental regulations towards preventing adverse effects on the community, natural resources or the environment.



CONFIDENTIALITY AND DATA PROTECTION

We expect our business partners to comply with all relevant data protection laws and statutory confidentiality regulations in their current version 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.



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, labour and safety laws. We have listed the appropriate minimum principles and requirements below; we encourage our business partners and their subcontractors to aim to surpass these minimums.

FORCED LABOUR AND HARASSMENT, DISCIPLINING EMPLOYEES

Our business partners shall not use forced labour 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. All disciplinary measures shall be documented in writing.

CHILD LABOUR

cosnova takes the issue of child labour extremely seriously. We do not tolerate any child labour in the supply chain of our products and see it as our duty to ensure that no child labour 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 homeworking 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 honoured. Wages shall be paid regularly, on time, in full, and in legal tender.

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 forty-eight 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.

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 colour, 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.

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 in production facilities 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.



CONSEQUENCES OF NON-COMPLIANCE

cosnova reserves the right to check, through an independent body, the compliance of any business partner as well as its sub-contractors with these principles and requirements at any time during an existing business relationship. Our business partners agree to these checks.

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.

CONFIRMATION OF RECEIPT AND ACKNOWLEDGEMENT

We hereby confirm:

- 1 Receipt and acknowledgement of the CODE OF CONDUCT FOR BUSINESS PARTNERS, version 5/2020; 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 of our employees, agents, sub-contractors, 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 necessary prerequisite for business relations between cosnova and us as a business partner.

NAME

COMPANY NAME

PLACE, DATE

SIGNATURE BY AUTHORISED SIGNATORY

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Agreement must be signed by authorised signatory.