

DOUGLAS

CODE OF
Conduct

Dear COLLEAGUES,



A handwritten signature in blue ink, consisting of a stylized 'S' followed by a few horizontal strokes.

Sander van der Laan
Group CEO

Our behavior defines DOUGLAS' future success and shapes our values. We strive to create THE consumer centric beauty destination, online and offline. Hence, we put our customers at the heart of everything we do and aim at offering them the best beauty products, outstanding services and unique online and offline shopping experiences.

Key to our success is your dedication and engagement as well as our joint commitment to ethical and lawful behavior. The DOUGLAS Code of Conduct is our company guideline on responsible business conduct. It outlines the adherence to laws and regulations and illustrates our own rules and values. Therewith, the Code of Conduct guides us in handling business decisions responsibly.

Our joint objective is to ensure that all activities in our company are shaped by the principles set out in the Code of Conduct - every day and everywhere in all countries. The standards of behavior are binding for our management and employees at all levels.

By performing ethically and with integrity we strengthen our company culture and live up to our values.

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1. *Our*

COMMITMENT

The Code of Conduct is binding for all employees as well as directors and officers of Douglas GmbH and its direct and indirect subsidiary companies worldwide (“DOUGLAS”).

WE ARE DOUGLAS

DOUGLAS is a global community of talented individuals who interact with respect and responsibility, engaged to bring forward the company and our products to be the best beauty destination for the customer. We observe applicable laws and familiarize ourselves with our internal rules and procedures to maintain DOUGLAS’ highest ethical standards for sustainable business success.

RESPONSIBLE CONDUCT

Our behavior defines the way we work. The Code of Conduct sets out the standards of behavior expected from all of us to contribute to our company culture and to shape our values. It reflects DOUGLAS’ commitment to ethical and compliant performance in everything we do.

GLOBAL COMMITMENT

The Code of Conduct is the foundation of our group-wide commitment to compliant behavior. It governs our business practice worldwide, in the regions and countries where we operate. By including its objectives into our daily work, we create one global community with a joint vision.

2. Respect and **RESPONSIBILITY**

DOUGLAS' culture is marked by appreciation, honesty and mutual respect. Management and employees at all levels are expected to treat each other with fairness and respect. We do not tolerate any kind of harassment, threatening or intimidating behavior. By maintaining an open dialogue we all contribute to a cooperation of trust and teamwork.



3. Diversity and **EQUAL OPPORTUNITIES**

We stand for tolerance and diversity and respect each employee as an individual. As employer we choose our teams based on their skills and talent and do not accept any discrimination with regard to ethnic origin or nationality, race or skin color, age, gender or sexual orientation, religion or beliefs, disability or other characteristics protected by law.

4. *Health and* SAFETY

Taking care of our employee's well-being is important to us. By ensuring health and safety at the workplace we reduce the risk of accidents or injuries in our stores and at our sites. We take precautions to provide our employees with safe and secure working conditions.



5. *Conflicts of* INTEREST

All employees need to ensure that their private interests do not contradict with DOUGLAS' business interests. A conflict of interest may be caused by personal relationship, business partnership or investment that interferes or appears to interfere with the employee's professional objectivity and judgement. Employees must disclose any potential conflict of interest to their supervisor who will advise them on the right way to handle the situation.



6. *Gifts and* BENEFITS

At DOUGLAS we do not use gifts and other benefits for personal gain, as a way to influence business decisions or to obtain an inadequate advantage from a business partner. Any gift, entertainment, hospitality or other benefit is only permitted if lawful and in line with our internal Anti-Corruption Policy, common business practice and modest. Each employee is responsible for preventing their professional objectivity from being affected by offering or accepting gifts or other benefits.

7. *Anti-Corruption and* ANTI-BRIBERY

As a global company we respect international anti-corruption standards and conduct our business ethically and lawfully. DOUGLAS rejects any form of bribery and corruption, no matter the purpose and involvement of someone in the public sector or private business. We expect our employees to act responsibly and with integrity.





8. *Fair*

COMPETITION

DOUGLAS promotes fair competition and operates in compliance with respective competition and antitrust laws and its internal Competition Compliance Policy. We respect free trade and do not enter into agreements, practices or mutual understandings with competitors leading to the exclusion of other enterprises from the market. We do not fix prices, terms and conditions to allocate markets, customers, territories, products we produce or sell, and do not exchange confidential information which may influence a competitor's independent commercial strategy.

9. *Anti-Money*

LAUNDERING

Our company prohibits any form of money laundering, that is concealing the origins of money obtained from unlawful activity such as bribery, fraud or embezzlement, in order to hide the money's origin and to create the appearance that the money originated from a legitimate source. We take appropriate measures to avoid that we are used as a vehicle for money laundering or any other illegal activity.



10. *Books and* RECORDS

DOUGLAS is committed to care, accuracy, timely and comprehensive handling of its financial information. We describe all business transactions accurately and ensure that our books and records are properly maintained in accordance with applicable laws, auditing standards and accounting principles.



11. *Business* PARTNERS

We apply due care to the choice of our business partners. DOUGLAS takes responsibility in integrity and transparency towards its suppliers, subcontractors, agents, consultants and other business partners and expects them to comply with applicable laws and adequate compliance standards.

12. *Product* QUALITY

As a beauty company we attach great importance to product safety and to ensuring that all products and manufacturing practices meet applicable laws, regulations and our own highest quality standards.



13. *Business* SECRET

DOUGLAS maintains confidentiality with regard to its internal or proprietary information that is not available to the general public. Such information may include details on the company's sales, profits, internal reporting figures, non-public information from our suppliers, consultants or other third parties.

14. *Data*

PRIVACY

We handle personal data in compliance with applicable laws and regulations pertaining to the collection and use of personal data, including data on others, such as customers or business partners. Personal data may only be collected, processed, or used insofar as it is necessary for predetermined, clear, and legitimate purpose.



15. *Protection of*

COMPANY PROPERTY


Employees are not allowed to use company property for personal gain, unless explicitly permitted. Company property includes merchandise, furniture and equipment, manpower, and other tangible and intangible assets, including trademarks, copyrights, product specifications and know-how.

16. Advice

While considering that this Code of Conduct may not cover any potential challenge you might face, always ask yourself the following questions as a self-check:

- **Is my behavior in line with the principles of this Code of Conduct?**
- **Is my action ethical and legally compliant?**
- **Is my conduct appropriate in the public eye (news, social media, etc.)?**
- **Is my action protecting our reputation and integrity?**

Your answer to all these questions should be “yes”. If you are in doubt and require further support, ask for advice. Talk to your supervisor, consult your Human Resources representative, ask the topic owner for assistance on specific topics or engage with your Country Compliance Officer or the Group Compliance Office.



Please refer to
the intranet for
contact details
in your country



17. Reporting VIOLATIONS

We encourage all employees to report potential violations of this Code of Conduct. Seek an open dialogue with your supervisor or the Human Resources Department. You may also contact your regional compliance hotline or the group compliance hotline. Reports will be handled confidentially.

Employees will not be retaliated against when making a report in good faith. In the spirit of an open work atmosphere and to enable an efficient and effective investigation of the reported incident, we ask you to identify yourself. Nonetheless in most countries we accept anonymous reporting should you find it necessary.

DOUGLAS might be obligated by law to disclose the identity of the reporter to authorities or relevant persons involved in an investigation or judicial proceeding.

18. Implementation

All of us are responsible for complying with the principles of this Code of Conduct. By incorporating the standards of behavior into our daily work we jointly implement our group commitment to ethical and compliant business practice. Any breach of the Code of Conduct will not be tolerated and appropriate action will be taken to address the violation. The standards of the Code of Conduct are supplemented by other group policies and procedures, including the DOUGLAS Anti-Corruption Policy and the DOUGLAS Competition Compliance Policy. We expect everyone to actively seek awareness of all DOUGLAS policies and procedures that are relevant for your area of work.



#LetItBloom

Douglas GmbH - Headquarters
Group Compliance Office

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DOUGLAS