DOUGLAS

SUPPLIER

Code of Conduct

Preamble

As Europe´s leading premium beauty & health platform Douglas group is aware of its responsibility for environmental protection, social standards and a sustainable future. We respect human rights and internationally recognized ethical standards, and align our actions thoroughly with this responsibility.

We likewise expect our business partners to comply with applicable laws, respect ethical standards and human rights, and adhere to environmental, social and corporate governance standards. To jointly create a sustainable future, we anticipate our business partners to further develop sustainability efforts in the supply chain.

The following requirements stipulate the basis for a successful long-term business relation between Douglas group and our business partners. We apply due care to the choice of our suppliers and business partners and perform risk assessments before entering into a business relationship.

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1. International laws and standards

Supplier is required to comply with applicable laws, regulatory provisions and internationally recognized principles, including the United Nations Global Compact initiative and the OECD Guidelines for Multinational Enterprises.

2. Ethics and governance

2.1. Corruption / Bribery / Money Laundering

Supplier shall not practice or tolerate any form of bribery or corruption. National and international anti-corruption standards including the US FCPA and the UK Bribery Act must be strictly adhered to. In particular, no services, gifts or benefits shall (neither directly nor indirectly) be offered to Douglas' employees or any government officials that may negatively affect their behavior in respect to his/her work. Supplier needs to inform Douglas about any situation that could constitute such a conflict of interest. Furthermore, the supplier shall comply with applicable anti-money laundering laws and regulations.

2.2. International Trade Controls

Supplier complies with export controls-, sanctions- and customs laws and regulations applicable to their business and ensures that they and their stakeholders are not listed on any applicable sanction list.

2.3. Fair Competition

Douglas expects the supplier to conduct its business in line with fair competition and in compliance with all applicable competition- and anti-trust laws.

2.4. Conflict Minerals

Supplier does not supply products to Douglas containing conflict minerals and materials which directly or indirectly finance or benefit armed groups and cause human rights abuses.

2.5. Animal Welfare

Alternatives to animal testing shall be used whenever possible. When animal testing is necessary, supplier shall minimize the number of animals used for testing. Tests shall be conducted only in accordance with all applicable laws.

2.6. Information Security, Data Protection, Disclosure of Information

Information with regard to confidentiality, integrity and availability must be protected by the supplier according to the required level of information security and based on applicable international information security standards.

Supplier adheres to all applicable data protection laws in particular with regard to personal data of consumers, customers, employees and shareholders when data is collected, recorded, hosted, processed, transmitted, used or erased.

Supplier shall safeguard and use confidential information appropriately and comply with contractual requirements on data protection and information security.

3. Human rights and fair labor practices

3.1. Prohibition of Forced Labor and Disciplinary Measures

No form of forced labor such as slavery, prison work or other forms of compulsory work will be tolerated by Douglas. All labor must be voluntary. Supplier may not apply any practice which forces employees to work or which hinder employees from leaving the employer. Psychological or physical coercion and use of security forces to support such practices is prohibited. Supplier shall not implement disciplinary measures which are inadmissible by law. Withholding employees' identification documents is not acceptable.

3.2. Prohibition of Child Labor

Child labor is not tolerated by Douglas. Supplier may not allow work under the statutory school leaving age and in no case under the age of 14 years (or according to the local statutory provisions when the minimum age lies above this). All forms of exploitation of children are forbidden. Working conditions which resemble those of slavery or which damage the health of children are forbidden. Supplier complies with national regulations for the protection of young employees.

3.3. Freedom of Association and Collective Negotiations

Supplier shall respect the right of all employees to form and belong to trade unions as well as to hold collective negotiations or the right to strike. Preventive or obstructive measures which serve to impede this right are not tolerated by Douglas. In countries in which the rights of assembly and collective negotiation are restricted by law, alternative possibilities of independent and free organization and conduct of negotiations are to be created. Employees' representatives need to be granted free access to the places of work of their members.

3.4. Wages and Working Hours

Each employee should receive a legally effective contract of employment. Employees should receive at least the minimum statutory or industrial wage or a wage reasonable in the region which is adequate to provide a living. Employees have to be paid timely and on a clear basis.

The working hours should correspond to legal provisions or regulations usual in the branch, depending on which provisions are stricter. The maximum admissible weekly working hours apply according to national legislation. Overtime may only be worked on a voluntary basis, and measures shall be established to prevent excessive physical and mental fatigue, as well as rest breaks.

3.5. Prohibition of Discrimination

Douglas does not tolerate any kind of harassment, threatening or intimidating behavior. Equal treatment and equal opportunity must be guaranteed and the diversity of employees valued. Supplier should choose its employees based on their skills and talent and 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.

3.6. Livelihood

The livelihood of any person has to be secured. Harmful soil changes, water or air pollution, harmful noise emission or excessive water consumption that significantly impairs the natural bases for the preservation and production of food, denies access to drinking water or sanitary facilities, or damage health, are prohibited. Furthermore, unlawful eviction and taking of land, forests and waters with the purpose of acquiring, developing or otherwise using them is prohibited, provided that their use secures the livelihood of a person.

4. Health and Safety

Supplier implements a health and safety management process, including regular risk assessments, controls and precautionary measures. A safe and hygienic work environment is to be provided. The environment of the work place and the materials with which the employees come into contact should comply with local legal and generally recognized health and safety requirements, depending on which are stricter. Industrial safety procedures which are designed to prevent work accidents and injuries through the operation of technical equipment, including protective measures to avoid exposure to chemical, physical and biological substances, are to be promoted. The supplier shall regularly train its employees on these safety practices and procedures.

5. Environmental Responsibility

Supplier shall comply with all applicable environmental laws, standards and regulations. In particular procedures and standards for waste management (including the prohibition of export and import of hazardous waste based on the Basel Convention), the handling and storage of chemicals and other hazardous substances (for instance mercury-contaminated products according to the Minamata Convention), as well as their disposal, and also for emissions and waste water treatment, have to be implemented. Certain persistent organic pollutants and their non-environmentally sound storage, handling or disposal are prohibited to produce or use under the Stockholm POP Convention. The supplier shall set up a system to identify and eliminate potential hazards to the environment and to dispose waste in an environment-conscious manner and to avoid the use of toxic raw materials.

6. Management System

The standards defined in this Douglas Supplier Code of Conduct are to be recognized by the supplier´s management. The management is responsible for the implementation and regular monitoring of these standards and informs all of its employees as well as its subcontractors and third parties on the requirements of this Supplier Code of Conduct. The supplier has to keep reasonable records which prove compliance with the Douglas Supplier Code of Conduct and which are made accessible to Douglas´ representatives upon request. Should the supplier not comply with these standards and not agree on improvements, this may lead to the termination of the business relationship.

Should you have any concerns about illegal or improper conduct, please contact the Douglas Group Compliance Office at compliance@douglas.de or confidentially report through our reporting channel at https://douglas.integrityline.app/?lang=en.

7. Regular Verification

Douglas reserves the right to evaluate supplier´s compliance with the principles of this Supplier Code of Conduct, for instance through an assessment of the human rights strategy or the compliance guidelines of the supplier (if available). Supplier`s financial and confidential information is not part of the review. The evaluation may be conducted by Douglas or a third party and is designed to not unduly disrupt the Supplier's normal business operations. During the evaluation, the supplier is expected to co-operate and to provide an adequate level of information.

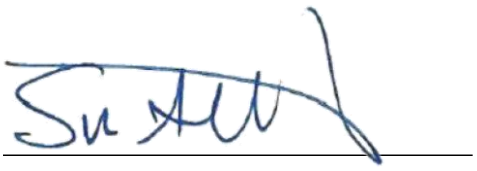
8. Revision of the Code

Douglas will review this Supplier Code of Conduct on a regular basis and, where necessary and appropriate, make amendments to the same. Amendments will be communicated to the supplier and are to be confirmed by it.

Düsseldorf, November 2026



Jean-Marc Bellaiche
Group CEO



Stefanie von Albert
EVP Assortment & Purchasing

Declaration of Consent

We, the undersigned, hereby declare

1. that we have received the Douglas Supplier Code of Conduct and have taken note of the same. We undertake, in addition to our obligations as specified in the contracts with Douglas, to comply with the Douglas Supplier Code of Conduct and its requirements.

2. that we inform Douglas if a collision arises between the provisions of the Douglas Supplier Code of Conduct and the applicable laws or regulations of the country in which we operate.

3. that Douglas or a third party appointed by Douglas may carry out checks in our companies in order to verify our compliance with the Douglas Supplier Code of Conduct.

4. that we inform our employees, subcontractors and third parties of the content of the Douglas Supplier Code of Conduct and ensure that they also comply with the provisions contained therein.

We furthermore confirm that compliance with the Douglas Supplier Code of Conduct is a requirement for the business relationships between Douglas and ourselves as business partners.

Place, date	Signature
Name, title	
Company name	
Contact details (phone/email)	
Company address	

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