



Policy statement on Human Rights and the Environment

1. OUR COMMITMENT TO PROTECTING HUMAN RIGHTS AND THE ENVIRONMENT

Douglas AG and its affiliated subsidiaries and sub-subsidiaries ("DOUGLAS") are committed to actively protecting human rights and the environment. As Europe's leading omnichannel provider of premium beauty, we are aware of our responsibility to uphold our human rights and environmental due diligence. Adherence to this responsibility is therefore an integral part of our decision-making processes and business activities - and thus forms the foundation of our economic success.

We are committed to

- respecting human rights and protecting the environment,
- taking into account the human rights- and environment-related interests of our employees, the employees in our supply chains and those who are (directly or indirectly) affected by our economic activities,
- ensuring a working environment that allows our employees to freely exercise their rights and freedoms.

We are guided by the following internationally recognized instruments in the implementation of our human rights and environmental due-diligence obligations:

- Universal Declaration of Human Rights
- United Nations (UN) Global Compact
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Core labour standards of the International Labour Organization (ILO)
- Minamata Convention on Mercury
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal
- Stockholm Convention on Persistent Organic Pollutants

This policy statement describes the human rights strategy of DOUGLAS, in line with the requirements of the German Supply Chain Due Diligence Act (LkSG).

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2. SCOPE OF APPLICATION

This policy statement is binding for the employees of all companies over which Douglas AG exercises a decisive influence. In addition, we expect our suppliers and business partners to respect human rights and protect the environment.

In our policy statement, we describe the current LkSG implementation at DOUGLAS and therefore consider the statement to be a "living document" that we regularly review and update as our due diligence processes continue to evolve.

3. POTENTIALLY AFFECTED PARTIES

As a corporate group with international operations, thousands of employees, a large number of suppliers and millions of customers, DOUGLAS is exposed to the risk of unknowingly having a negative impact on the protection of human rights and environmental standards. To minimize this risk as much as possible, we have analyzed which groups of people could be negatively affected by our business activities and supply chains, and are focusing on them when carrying out our due diligence obligations:

- All DOUGLAS employees
- All employees of direct and indirect suppliers
- local interest groups (e.g., customers, local residents near our stores, local residents near production sites)

Among the groups mentioned, we have identified the following subgroups in particular as being particularly vulnerable and therefore in need of specific protection:

- Children
- Women
- Older people
- Whistleblowers
- People with disabilities
- People, who perform functions in works councils
- Trainees, interns, and working students
- People who have temporary employment contracts
- People who belong to the LGBTIQ+ community
- People who belong to national, ethnic, religious or linguistic minorities

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4. FULFILLING OUR DUE DILIGENCE OBLIGATIONS

DOUGLAS sees the fulfillment of its human rights and environmental due diligence obligations as an ongoing improvement process. This also includes constantly reviewing whether there is potential for further development. We actively leverage this potential by implementing additional measures or adapting existing activities as needed.

RISK MANAGEMENT SYSTEM

DOUGLAS has set up a risk management system to ensure compliance with its due diligence obligations and has embedded the newly developed structures, processes, and measures in DOUGLAS' business processes. The operational implementation of the LkSG is the responsibility of the DOUGLAS Group Compliance Office. DOUGLAS has appointed two human rights officer to monitor the fulfillment of the LkSG requirements. The overall responsibility lies with the Executive Board of Douglas AG. The management of Parfümerie Douglas Deutschland GmbH remains responsible for implementing the LkSG in accordance with its own legal obligations.

RISK ANALYSES

DOUGLAS carries out an appropriate risk analysis at least once a year and on an ad hoc basis if necessary to identify human rights- and environment-related risks in its own business area and at its direct suppliers. In the case of indirect suppliers, the risk analysis is carried out on an ad hoc basis if there is substantiated knowledge.

As part of its regular risk analysis, DOUGLAS analyzes its own business area and its direct suppliers for the following potential risks:

- Child labor
- Forced labor and slavery (including human trafficking)
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association
- Unequal treatment in employment
- Withholding an adequate wage
- Environmental pollution affecting people
- Unlawful eviction and taking of land, forests and water
- Hiring/using security forces in violation of human rights
- Prohibited manufacture of mercury-added products, use of mercury and mercury compounds, treatment of mercury waste

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- Prohibited production and use of persistent organic pollutants (POP) and non-environmental sound management of POP-containing waste
- Prohibited import and export of hazardous waste

The high complexity of our supply chains requires the use of a software solution that supports us in identifying, validating, and prioritizing possible risks. The risk analysis methodology we currently use is based on the recommendations of the German Federal Office for Economic Affairs and Export Control (“BAFA”) in the “Guidance on conducting a risk analysis” published in August 2022 and consists of three steps: (1) abstract risk assessment, (2) concrete risk assessment, (3) prioritization of identified risks. In addition, the relevant decision-makers are informed of the risk analysis results, for example, to enable the introduction of appropriate preventive measures.

As part of the regular risk analysis carried out for financial year 2024/2025, the following potential human rights and environmental risks were prioritized:

Own business area

- Environmental pollution affecting people
(moderate risk in three legal entities within own business area abroad)

Direct suppliers

- Forced labor and slavery
- Environmental pollution affecting people
- Prohibited manufacture of mercury-added products, use of mercury and mercury compounds, treatment of mercury waste
- Prohibited production and use of persistent organic pollutants (POP) and non-environmental sound management of POP-containing waste

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PREVENTIVE MEASURES

On the basis of the results of the risk analysis, DOUGLAS takes appropriate preventive measures to actively mitigate or prevent potential risks in its own business area and along the supply chain.

The preventive measures taken in our own business area currently focus on enabling our employees and suppliers to comply with human rights- and environment-related obligations by providing a comprehensible framework for action:

- DOUGLAS Code of Conduct
- DOUGLAS Policy Statement
- DOUGLAS Supplier Code of Conduct
- LkSG Due Diligence Process for Supplier Selection
- Whistleblowing Policy for the complaints procedure “Integrity Line”
- Contractual agreement on ad hoc based supplier audits
- Training and awareness-raising measures

The human rights strategy of DOUGLAS is implemented in all relevant business processes and is particularly taken into account in the selection of direct suppliers. The requirements are taken into account when defining corporate strategies to work towards reducing identified potential risks.

Relevant direct suppliers are required to comply with the DOUGLAS Supplier Code of Conduct and thus to meet our expectations for suppliers to protect human rights and environmental standards.

REMEDIAL ACTION

If DOUGLAS becomes aware that a violation of human rights or environmental standards is either imminent or has occurred in its own business area or in its supply chains, DOUGLAS will immediately take appropriate measures to prevent or minimize the violation. In its own business area, DOUGLAS will immediately end any violations that have been identified.

If violations by a supplier become known, DOUGLAS will take action to end or minimize the violation. If possible and reasonable, DOUGLAS will cooperate with the respective suppliers in such cases to ensure appropriate and effective solutions in the interest of the parties affected.

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COMPLAINTS PROCEDURE

Our complaints procedure enables any person to confidentially report to us indications of (potential) violations of human rights and environmental standards in our own business area and in our supply chains (both with regard to direct and indirect suppliers). The reporting channels available are our whistleblower tool "Integrity Line" and the mailbox of our DOUGLAS Group Compliance Office:

- Integrity Line: <https://douglas.integrityline.app/?lang=en>
- DOUGLAS Group Compliance Office: compliance@douglas.de

Reports via Integrity Line can, if desired, be submitted anonymously and in all common European languages.

All reports and, if known, the identities of the reporting parties are processed confidentially and in compliance with the applicable data protection regulations. The persons responsible for this have been trained accordingly and are bound to maintain confidentiality.

Reports are processed, as far as possible, in collaboration with the person providing the information and on the basis of our publicly available [whistleblowing policy](#).

Key findings from the processing of reports are also used to further develop the LkSG risk management to continuously improve the appropriateness and effectiveness of our human rights- and environment-related due diligence processes.

EFFECTIVENESS REVIEW

We regularly review the effectiveness of our risk management system. In addition, the measures taken and the complaints procedure at DOUGLAS are reviewed at least once a year and on an ad hoc basis to ensure their effectiveness and updated immediately if necessary.

DOCUMENTATION

The responsible internal departments continuously document the ongoing implementation of the due diligence processes implemented at DOUGLAS. On this basis, for example, requests for information from the relevant authorities are answered.

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5. HUMAN RIGHTS- AND ENVIRONMENT-RELATED EXPECTATIONS

We expect both our employees and our suppliers to respect human rights and to protect the environment within the scope of their respective business activities.

That is why we have developed the DOUGLAS Code of Conduct for employees and the DOUGLAS Code of Conduct for Suppliers for relevant suppliers, so that our respective expectations are defined in a binding and comprehensible manner.

6. CONTACT INFORMATION

The DOUGLAS Group Compliance Office will answer any questions regarding this policy statement under the following e-mail address:

compliance@douglas.de

Information on (potential) violations of human rights- or environment-related due diligence obligations in DOUGLAS' own business area or in our supply chains can be submitted (anonymously, if preferred) through our "Integrity Line" complaints procedure:

<https://douglas.integrityline.app/?lang=en>

7. FINAL REMARKS

This LkSG policy statement also represents the policy statement of Parfümerie Douglas Deutschland GmbH. Although the Parfümerie Douglas Deutschland GmbH is part of the own business area of the Douglas AG, it falls within the LkSG scope due to its company size.

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