

DOUGLAS Corporate Brands

Ingredients Policy

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1. Purpose

At the DOUGLAS Group, we are committed to upholding high standards of social and environmental responsibility. We strive to reduce our environmental footprint, support ethical sourcing, and ensure the wellbeing of all stakeholders – our employees, producers, customers, and the communities in which we operate.

This policy defines the principles and requirements that DOUGLAS Corporate Brands applies to ensure all cosmetic formulations comply with current regulations and pose no undue risks to human health or the environment. It addresses over **75 ingredient families**, integrating both legally regulated substances and voluntary bans on controversial, non-regulated compounds. A full list of these substances is provided in the annex.

This Ingredient Policy is applicable to every Corporate Brand product launched from January 2026 and will be subject to annual review.

2. Scope

Applies to all **DOUGLAS Corporate Brands** cosmetic product categories developed, manufactured, or distributed by DOUGLAS, as well as to all raw material and formula producers. It applies exclusively to substances intentionally added to product formulations. It does not cover the presence of impurities or trace contaminants that may occur unintentionally during manufacturing or from raw materials.

DOUGLAS Corporate Brands include: DOUGLAS and NOCIBÉ Collection, Dr. Susanne von Schmiedeberg, one.two.free! and Jardin Bohème.

Covered product families include:

- **Skincare:** cleansers, toners, moisturizers, serums, masks, exfoliants
- **Haircare:** shampoos, conditioners, styling products
- **Color Cosmetics:** foundations, concealers, powders, blushes, lipsticks, eyeliners, mascaras
- **Fragrances:** perfumes, body mists, scented lotions
- **Suncare:** sunscreens, after-sun lotions, self-tanning products
- **Personal Care:** deodorants, antiperspirants
- **Bath & Shower:** body washes, shower gels, bath oils, salts

3. Regulatory Framework

- Regulation (EC) No 1223/2009 on cosmetic products and its amendments.
- Opinions of the Scientific Committee on Consumer Safety (SCCS).
- International standards and guidelines (IFRA, REACH, CLP) and local regulations.

4. General Principles

1. **Regulatory Compliance:** All ingredients must be listed and authorized under Regulation (EC) 1223/2009 and not subject to more stringent restrictions by recognized authorities.
2. **Scientific Monitoring:** SCCS opinions and recommendations from health agencies (e.g., ANSM, DGCCRF) must be reviewed by our producers prior to each formulation.
3. **Precautionary Principle:** Any persistence, bioaccumulation, environmental toxicity, or health risk in a substance is excluded or strictly limited.
4. **Transparency & Traceability:** our producers must provide up-to-date information and when applicable: certificates of conformity, particle size analyses, and toxicological studies.

5. Requirements by Ingredient Family

5.1 Fragrances & Aromas

Applicable Products: Perfumes, body mists, scented skincare.

Associated Risks: Skin sensitization, respiratory irritation.

- Must comply with the latest IFRA (International Fragrance Association) standards.
- Restrictions on camphor, menthol, and eucalyptol by age group:
 - Under 36 months: camphor $\leq 0.015\%$, eucalyptol $\leq 0.1\%$, menthol $\leq 0.45\%$, total $\leq 4.5\%$
 - Ages 3-6: camphor $\leq 0.15\%$, eucalyptol $\leq 1.12\%$, menthol $\leq 4.5\%$, total $\leq 4.5\%$

5.2 Preservatives & Antioxidants

Applicable Products: Creams, lotions, shampoos, makeup removers.

Associated Risks: Endocrine disruption, sensitization, CMR, environmental toxicity.

- Prohibited: BHA, parabens (methyl-, ethyl-, propyl-, butyl-), triclosan, formaldehyde and releasers.
- Controlled use of phenoxyethanol (max 0.4% for under 3 years) and benzyl alcohol (max 0.5%; prohibited on lips/underarms).

5.3 Nanomaterials

Applicable Products: Anti-aging treatments, sunscreens, certain exfoliants.

Associated Risks: Tissue penetration, cellular toxicity, environmental impact.

- Compliance with Article 16 of Regulation 1223/2009.
- Prohibited: unlisted nanomaterials, particle size distribution (D10, D50, D90)

We proactively align with SCCS safety assessments, including ongoing updates, even when not yet mandated by regulation.

5.4 Silicones & Hydrocarbons

Applicable Products: Hair conditioners, dry oils, moisturizing creams.

Associated Risks: Environmental persistence, bioaccumulation, endocrine disruption.

- Prohibited: Cyclopentasiloxane (D5) and Cyclohexasiloxane (D6).
- Mineral oils and petroleum derivatives require specific documentation to ensure safety of raw materials.

5.5 Microplastics

Applicable Products: Exfoliants, makeup, lotions.

Associated Risks: Aquatic microplastic pollution, ingestion by wildlife.

- All particles classified as microplastics under EU Regulation 2023/2055 require quality approval and may only be used with justified exemption.
- A progressive phase-out plan is also ongoing to accelerate progress.

5.6 Other Substance of Concern

Applicable Products: All product types (depending on the substance).

Associated Risks: CMR, endocrine disruption, reproductive toxicity, environmental impact.

- Prohibited: Phthalates (e.g., DEHP, DBP), REACH SVHCs, nitrosamine generators, E- and P-series glycol ethers, EDTA, acetone, PFAS.

5.7 Animal, Plant & Mineral Origin Ingredients

Applicable Products: Serums, masks, natural oils.

Associated Risks: BSE, food allergies, heavy metals, child labor, deforestation.

- Strict exclusion: Bovine or marine ingredients without a valid certificate of origin (Regulation EC 1069/2009 Cat.3C).
- Plant-ingredients may require RSPO certification, heavy metal analysis, deforestation due diligence, when applicable.

5.8 UV Filters & Colorants

Applicable Products: Sunscreens, foundations, blushes, lipsticks.

Associated Risks: CMR, endocrine disruption, photosensitization, aquatic toxicity.

- Prohibited: Toxic or endocrine-disrupting filters/colorants (e.g., oxybenzone, benzophenones, PABA).
- Limit: Max 4 recognized UV filters; glitter < 150 µm; prohibited on damaged skin.

6. Evaluation, Approval and Monitoring Process

Step	Description	Responsible	Accountable
1. Document Review	Verify compliance with EU regulatory annexes (e.g., EC 1223/2009, SCCS opinions) and the DOUGLAS Corporate Brands Ingredient Blacklist . Ensure alignment with upcoming regulatory changes and voluntary commitments.	Producer → provides full ingredient documentation (SDS, allergen statements, safety certificates) to comply with regulation and internal specifications Quality Team & Safety Assessor → verifies documentation provided by the producers	Head of Quality
2. Toxicological Assessment	Conduct in silico , in vitro , or in vivo studies when required. Review available toxicological data, exposure limits, and risk assessments to confirm consumer safety.	Quality Team & Safety Assessor → checks or reviews toxicological assessments when needed Producer → provides available safety studies and test reports when needed	Head of Quality
3. Safety Approval	Obtain final sign-off before formula validation and production.	Quality Team & Safety Assessor	Head of Quality
4. Ongoing Monitoring	Establish a systematic review of all approved ingredients at least annually or whenever regulations change . Maintain a centralized Ingredient Compliance Database to track regulatory updates,	Quality Team & Safety Assessor → updates compliance database Producer → provides updated certificates or composition	Head of Quality

Step	Description	Responsible	Accountable
	blacklist changes, and producer safety declarations.	changes for every new project launched or reordered	

7. Annex

Ingredient List

This policy applies to the following **75+ substances and ingredient families**, with their respective status:

Fragrances & Aromas

- Camphor (Restricted)
- Menthol (Restricted)
- Eucalyptol (Restricted)

Preservatives & Antioxidants

- BHA (Ban)
- Methylparaben (Ban)
- Ethylparaben (Ban)
- Propylparaben (Ban)
- Butylparaben (Ban)
- Triclosan (Ban)
- Triclocarban (Ban)
- Formaldehyde releasers (Ban)
- BHT (Ban)
- Salicylic acid (Ban)
- Phenoxyethanol (Restricted)
- Benzyl alcohol (Restricted)

Nanomaterials & Microplastics

- Nanomaterials not explicitly authorized under Annex VI of Regulation (EC) 1223/2009 (Ban): any nano-scale materials not on the EU's positive list are prohibited
- Microplastics (Restricted - Progressive phase-out ongoing)

Silicones & Hydrocarbons

- Cyclopentasiloxane (D5) (Ban)

- Cyclohexasiloxane (D6) (Ban)
- Mineral oils & petroleum derivatives (Restricted)

Solvents & Glycol Ethers

- Triethylhexanoin (Restricted)
- Ethylhexanol (Restricted)
- E-series glycol ethers (Ban)
- P-series glycol ethers (Restricted)

Restricted Contaminants

- Phthalates (Ban)
- REACH SVHC (Ban)
- Nitrosamine generators (Ban)
- Glutaral (Ban)
- Resorcinol (Ban)
- EDTA & salts (Ban)
- Acetone (Ban)
- PFAS (Ban)
- Unlisted nanomaterials (Ban)

PEG & Derivatives

- PEG compounds (Restricted)

Special Actives & Dyes

- Hair dye precursors (e.g., PPD, Basic Blues, etc.) (Ban/Restricted)
- UV filters (oxybenzone, benzophenones, etc.) (Ban/Restricted- according to the UV filter concerned)

This policy is reviewed annually or upon major regulatory changes.