



# **Policy statement** on Respect for 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 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 a human rights officer to monitor the fulfillment of the requirements of the LkSG. The overall responsibility lies with the Executive Board of Douglas AG.

#### **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.

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 initiate appropriate preventive measures.

As part of its own business area, DOUGLAS is analyzing its individual subsidiaries. In this process, a risk assessment is carried out taking into account country- and industry-specific risk factors. With regard to direct suppliers, these are also assessed based on country- and industry-specific risk factors. Subsequently, further information is collected for identified abstract risks in order to verify the abstract risk assessment.

As part of the last risk analysis, we identified and prioritized potential human rights- and environment-related risks particularly in the areas of unequal treatment, disregard for freedom of association and non-compliance with environment standards.

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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
- Whistleblower Guidance for the complaints procedure “WhistleB”
- 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 in order to work towards reducing identified risks.

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

## **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 "WhistleB" and the mailbox of our DOUGLAS Group Compliance Office:

- DOUGLAS Group Compliance Office: [compliance@douglas.de](mailto:compliance@douglas.de)
- WhistleB: <https://report.whistleb.com/en/douglas>

Our objective is to identify potential risks at an early stage and to minimize, prevent or end possible human rights violations and environmental damage by responding quickly. For this reason, reports can be submitted to WhistleB both anonymously and in the 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. They are not bound by any instructions in their role as contact persons for reports and are impartial.

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

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.

## DOCUMENTING AND REPORTING

The responsible departments continuously document the implementation of the due diligence processes implemented at DOUGLAS internally. On this basis, we report externally to the BAFA with the report on the LkSG.

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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](mailto: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 "WhistleB" complaints procedure:

<https://report.whistleb.com/de/douglas>

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