

HUMAN RIGHTS POLICY
ADA's engagement on Human Rights
January 2025

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I. Preamble

ADA Cosmetics is a single-source provider of hotel amenities – we develop, manufacture, and distribute our products worldwide. Being in a leading position in the market, we acknowledge our responsibility to respect internationally recognized human rights. As responsible corporate citizens, we believe that we can foster positive change for human rights through our business.

We acknowledge the inherent dignity of every person, ensure equality and non-discrimination, prevent abuse, empower individuals, and contribute to social, economic, and international stability.

As part of our strategic approach to sustainability, we have identified not only our own workforce, but also other workers in our value chain as issues of high concern in our dual materiality assessment. Consequently, we want to ensure safe working conditions, prevent exploitation, protect communities from harmful environmental impacts and promote ethical practices and corporate responsibility.

Our Human Rights Policy is designed to clarify our intentions, expectations and values in relation to our commitment to human rights, both internally and externally with stakeholders.

II. Commitment

ADA Cosmetics aims to keep a standard of excellence which follows our mission statement "Putting beauty into travel" surprising, sustainable and safe ([Mission, Vision & Values - ADA Cosmetics International \(ada-cosmetics.com\)](#)) in every aspect of the business, including legal, ethical and responsible conduct in all its operations.

ADA Cosmetics expects these commitments to be adopted by its employees and all direct and indirect business partners (our supply chain, communities, potentially affected groups and communities, and other relevant stakeholders). Therefore, ADA Cosmetics requires its (in-)direct business partners to circulate and apply the principles listed in this document within the business partner's organisation and their respective value chain.

III. International framework

In line with the United Nations Guiding Principles on Business and Human Rights, we commit ourselves to upholding the principles of the following internationally recognised human rights frameworks and standards:

- The basic principles of human rights, as laid down in the International Bill of Human Rights (The United Nations Universal Declaration of Human Rights, The United Nations International Covenant on Economic, Social and Cultural Rights, The United Nations International Covenant on Civil and Political Rights)

- The eight Fundamental Conventions of the International Labor Organization (ILO)
- The International Labour Organization Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration)
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The OECD Guidelines for Multinational Enterprises (OECD Guidelines)
- All applicable country-specific laws and statutory requirements covering human rights

Where country-specific laws and above listed, international human rights standards differ, we shall endeavour to follow the higher standard; where they are in conflict, we must seek to respect internationally recognized human rights to the greatest extent possible.

ADA Cosmetics is also supporting the Ten Principles of the United Nations Global Compact (UNGC) on human rights, labour, environment, and anti-corruption. We are committed to making the UN Global Compact and its principles part of the strategy, culture, and day-to-day operations of our Company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. You can find our commitment on the UNGC webpage: <https://unglobalcompact.org/what-is-gc/participants/161750-ADA-Cosmetics-International-GmbH>.

IV. Principles

ADA Cosmetics sets out priorities connected to its business activities and the activities of business partners and other stakeholders in their value chain. The following list of human rights risks was drawn up based on the most serious risks. It will guide ADA Cosmetics in focusing resources to address or remedy adverse human rights impacts. Human Rights risks were assessed based on sector and country specific criteria. This includes our production site countries as well as our Tier 1 suppliers' locations, and further industry specific risks. A detailed risk assessment was conducted and validated via independent third-party providers.

A. Discrimination and Harassment

- The elimination of discrimination with respect to employment and occupation including, but not limited to, ethnicity-, race- and gender-based discrimination.
- The elimination of harassment and abuse.
- Elimination of any form of discrimination, regardless of gender, race, religion, age, disability, sexual orientation, nationality, marital status, political opinion, social group, ethnic origin, or medical status.

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- No characteristics of an individual shall be the basis of decisions regarding any employment decision for hiring, job assignment, bonus, allowance, compensation, and discipline, ADA Cosmetics does not tolerate harassment and abuse. We have committed to ensuring our workplace is free of harassment and abuse, including sexual harassment. Harassment and abuse are defined as:
 - Any form of – or threat of – physical violence, including slaps, pushes or other forms of physical contact to maintain labour discipline.
 - Any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, to maintain labour discipline.
 - Sexual harassment of any kind.

B. Forced Labour and Child Labour

- The elimination of all forms of forced or compulsory labour, or activities that are known to lead to forced labour (e.g., human trafficking).
- The abolition of child labour and adequate protections for workers above the legal working age but below age 18.

C. Working Hours and Conditions

- The prevention of excessive working hours/ assurance of adequate working hours.
- Safe and healthy work, including:
 - Access to water, sanitation, and hygiene (WASH)
 - Emergency preparation and response
 - Hazardous materials handling procedures
 - Management systems that address health and safety risks
 - Appropriate building construction, electrical, and fire safety

D. Adequate Wages and Benefits

- The provision of the legal minimum wage and all legally mandated benefits including employer contributions for social security benefits and services.
- Aspirations for the provision of a living wage that covers the necessities for life as defined in its local context (e.g., food, water, housing, health care, education, clothing, transportation, childcare, discretionary income).

E. Freedom of Association and Ethical Practices

- Freedom of association and collective bargaining.
- Fair and ethical business practices, including anti-corruption/bribery.

V. Roles and responsibilities within the company

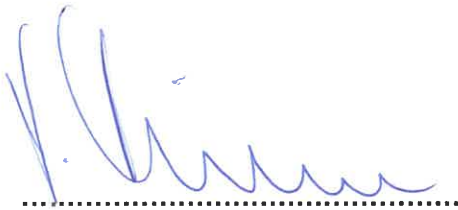
We have clearly defined roles and responsibilities for the implementation of our Human Rights Management System. It is designed to ensure the effective implementation of Human Rights principles throughout our organization.

This policy has been approved by ADA's Chief Executive Officer. It is regularly presented to internal and external stakeholders and the Leadership Team. The policy may be regularly updated to reflect our ongoing progress.

Our governance structure ensures effective implementation of human rights due diligence initiatives, led by our Chief of CSR, a key member of the Leadership team. This role involves integrating human rights considerations into core business processes and embedding these principles in both operational and strategic dimensions. Our Chief of CSR reports to the CEO.

Our Chief of CSR heads the Human Rights Steering Committee, which is composed of: our Chief of Supply Chain, our Chief of Human Resources, our Head of Global QHSE and our Legal Counsel as well as our CSR Manager.

Date: 24 January 2025



Lutz Hübner
CEO, ADA Cosmetics