

# CODE OF CONDUCT



# FOREWORD BY MANAGEMENT

**Dear employees, dear business partners,**

Building relationships with our customers, partners and employees that are founded on trust is crucial to the success of our company. We therefore all have a responsibility to preserve and strengthen this trust by behaving in a transparent and proper manner. That includes understanding and adhering to all applicable rules and legal regulations.

As managing director, I – together with the managers in the Group – am committed to our values and principles and firmly believe that they are key to successful cooperation and collaboration within our network.

I therefore ask you, as employees, as business partners: Let's work together to implement this code of conduct and not only deliver on our promise of high-quality cosmetics, but also make values like integrity and fairness even more of a priority.

Thank you for your support and commitment.

A handwritten signature in white ink that reads "Katharina Höhne". The signature is written in a cursive, flowing style.

Katharina Höhne  
Managing Director

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## Preamble

The code of conduct is a guideline for the entire company, as well as our business partners, and applies equally to every single employee of the JDA cosmetic group and, of course, all associated companies:

JDA GmbH & Co. KG,  
CARECOS Kosmetik GmbH,  
JEAN D'ARCEL Cosmétique GmbH & Co.KG,  
JEAN D'ARCEL Wellness & Spa Division GmbH.

Specifically, it is aimed at the management team, managers and all employees.

We also expect our suppliers, including service providers, to respect and abide by the guidelines defined in this document.

The code of conduct reflects our commitment to the defined values and principles and demonstrates our responsible conduct towards our business partners, customers and employees.

## Responsibility of company management

The JDA cosmetic group believes it has a duty to act in an economically, socially and environmentally responsible manner. The company strives to conduct its business competently on an ethical and moral basis and engage in fair competition in all markets. This includes compliance with the applicable laws and the acceptance of bans on cartels/restrictions on competition. We do not wish to create any improper advantages for ourselves in relation to customers, suppliers or competitors.

## Breaches of the code of conduct

We trust that all employees will act in accordance with the code of conduct. Nevertheless, we encourage employees to alert us to any potential breaches and raise any concerns they may have about potentially inappropriate conduct. A failure to abide by the code of conduct may damage the trust-based relationships we have built up with customers and partners, and in doing so expose the company as a whole to risk. It is therefore important for us, as a company, to be able to respond to any potential breaches promptly. Any concerns in this regard can be discussed with the relevant manager or reported directly to [compliance@jda.de](mailto:compliance@jda.de). Reports submitted to [compliance@jda.de](mailto:compliance@jda.de) are handled anonymously.

# CORPORATE CULTURE

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WE THINK  
ENTREPRENEURIALY  
AND ACT  
RESPONSIBLY



WE FIND CREATIVE  
AND INNOVATIVE SOLUTIONS  
FOR OUR CUSTOMERS



WE ARE OPEN TO CHANGE  
AND WILLING TO LEARN



WE APPROACH  
TASKS WITH AN OPEN MIND  
AND FULL OF OPTIMISM



WE ARE PROACTIVE  
AND IMPRESS WITH  
RESULTS



WE SUPPORT ONE ANOTHER  
AND WORK TRANSPARENTLY



## Our values

Our company values form the basis of how we work together and with others. These values are implemented and developed with the support of our employees across all areas of the company.

Our principles of conduct and leadership highlight the issues that are particularly important to us in our day-to-day work and define how we implement a common leadership culture. The principles provide specific suggestions for the conduct that is expected from managers but also from all employees. Employees are expected to abide by these principles in their day-to-day interactions with one another, as well as with customers and partners.

With our team spirit and our constructive cooperation, we are ensuring the long-term success of the **JDA cosmetic group**. That is why it is important to us that every single person takes responsibility. If mistakes are made, we work together to find a solution and ensure that the problem is permanently resolved rather than looking for someone to blame.



**APPRECIATING  
INDIVIDUALITY**



**ASSUMING  
RESPONSIBILITY**



**EXPERIENCING  
ENTHUSIASM**



**EARNING  
TRUST**



**LIVING CUSTOMER  
ORIENTATION**

## Management development

Managers are responsible for the successful implementation of the corporate strategy in their area, as well as the satisfaction and development of their employees. By providing regular training and coaching, the **JDA cosmetic group** ensures that managers are well equipped to handle this responsibility and advocate a common leadership culture. Regular "Leadership Lounges" provide an opportunity for managers to share experiences and ideas.

## Employee development

Our employees are important to us. We want to make sure that their uniqueness is recognised and encouraged. One key way in which we do this is through regular feedback meetings between employees and managers. To support joint development, the **JDA cosmetic group** advocates open and honest collaboration.

Another of our top priorities is to ensure that we are supporting our employees' lifelong learning and offering them appropriate opportunities in this respect.

## Internal communication

We make sure that employees are regularly informed about what is happening in the company and that news is communicated openly, transparently and promptly.

We do this in a variety of ways, such as at the quarterly information events held by company management and via BeautyInside, an internal company magazine by employees for employees. Important topics are also discussed in monthly management meetings at department head level and communicated as appropriate.



## Dialogue with cooperation partners

All business information of our partners and their company secrets are treated sensitively and confidentially. Required documents are created, stored and, where applicable, destroyed after the cooperation ends in the proper manner.

## Embracing customer focus

We are fair and honest in our interactions with customers and business partners. We take careful note of the wishes, requirements and expectations of our customers and business partners in the relevant departments (Sales, Marketing, R&D) to ensure the prompt, targeted implementation of our products. Our top priority is to build a lasting, stable relationship with our business partners on a foundation of trust.

We expect our partners throughout the supply chain to demonstrate the same customer focus.

## Fair competition

We are completely committed to fair competition and adhere to the laws prohibiting restrictions on competition in all countries where the **JDA cosmetic group** operates.

As the legal assessment depends on the relevant laws and market conditions and can pose a challenge in individual cases, the responsible Legal department must be consulted in case of doubt.

## Compliance with applicable laws

We require our managers to familiarise themselves with the laws, regulations and rules that are relevant to their area of responsibility and to adhere to them at all times. In particular, managers are responsible for compliance with the code of conduct.

The business practices of our business partners and their suppliers must also comply with the applicable regulations. This is particularly relevant to the Export and Supply Chain Management departments, as well as in the context of payment and capital transactions.

We expect our suppliers and service providers to adhere to our ethical standard, including the principles of the Global Compact.



## Health, safety and the environment

Safety is important to us. Our greatest concern is to ensure that every single person is working in a safe and healthy environment.

- We have clear health and safety standards, which are subject to a continuous monitoring and adaptation process.
- We prohibit the dangerous consumption of alcohol and drugs and the misuse of other substances in the workplace.
- Our **JDA cosmetic group** employees are jointly responsible for the protection of people and the environment and for ensuring that the site where we operate is safe and liveable.

The protection of people and the environment and the conservation of resources are fundamental company objectives.

The **JDA cosmetic group** is committed to conducting business in a sustainable and socially responsible manner. In doing so, we are pursuing our aim of creating and maintaining safe and healthy workplaces and also supporting our drive for progress in sustainability.

## Human rights

The **JDA cosmetic group** is committed to ensuring that the Universal Declaration of Human Rights is respected and adhered to within the company and across the supply chain.

We emphatically reject child labour and forced labour without exception and expect our business partners to do the same.

## Prohibition of discrimination

All forms of discrimination are prohibited as a matter of principle, whether on the basis of nationality, ethnicity, age, gender, sexual orientation, marital status or ideology.

New hires, promotions and other decisions regarding employees are always made free from any discrimination.

## Diversity and inclusion

We treat everyone with appreciation, respect and fairness. It is important to us that every single employee feels like they belong in the company. We honour inclusion and diversity by catering to the needs of each individual person. We live up to these values internally with employees and colleagues, in our network with customers and partners and externally with consumers.

## Fair pay

All employees receive fair pay for their work, which corresponds at a minimum to the statutory and/or customary industry minimum wage.



## Conflict of interests

A conflict of interests exists if an employee's personal, social, financial or political interests overlap with the company's interests.

Any potential conflict of interests should be disclosed to the respective manager. For example, secondary employment in the form of services or consulting for third parties should be disclosed to the manager if there is a business relationship with the **JDA cosmetic group** or a competitor.

## Gifts and invitations

As part of their work for the **JDA cosmetic group**, employees come into contact with suppliers and service providers who play an important role in the company's success.

It is therefore essential that our relationships with suppliers, customers and all business partners are based on a clear commitment to fair conduct. Gifts and invitations must not compromise the ability to make business decisions.

## Corruption

We behave impeccably in our business relations with others, adhere to the applicable laws and relevant regulations against corruption, data abuse, bribery and fraud, and avoid the appearance of any conflict of interests.

Employees of the **JDA cosmetic group** are strictly prohibited from offering money or other gifts of value to officials or other public servants as a gift.

## Donations and sponsorship

The **JDA cosmetic group** attaches great importance to transparency and prudence in matters concerning donations and sponsorship. Employees are made aware of the issue via channels such as the employee magazine.

We ensure that all donations and sponsorship activities comply with the relevant laws. Furthermore, they are voluntary and nothing is expected or demanded from the recipients in return.

Some of our donations are made with the aim of supporting developing countries, in particular countries that are relevant to our company. Other recipients include associations and charitable organisations in the region, for example. Donations with political intentions are prohibited.

# INFORMATION PROTECTION

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## Handling internal company information, business secrets

It is important to us that the cosmetic products manufactured, the work equipment used and the intellectual property belonging to the company are handled carefully and responsibly.

We require our employees to protect trade and business secrets. Confidential information and documents must not be disclosed or otherwise made accessible to third parties without authorisation, unless permission has been granted to do so or it involves public information. We expect the same of our business partners.

## Data protection

It is of the utmost importance that personal data is handled securely. Legally secure data collection and processing (in accordance with data protection law) is crucial to sustainable and transparent cooperation with our customers. We therefore expect our employees to familiarise themselves with the applicable legal requirements within their area of responsibility. Only the data that is necessary for the relevant purpose is collected, and this data is stored only for as long as legally required. We expect our suppliers to do the same.

