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NATURKOSMETIK



**CORPORATE DUE DILIGENCE  
IN THE SUPPLY CHAIN**

**SUPPLIER CODE OF CONDUCT**



## Preamble

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Economic success and social responsibility cannot be separated. Responsible and ethical behavior towards employees, business partners, society and the environment is an integral part of the value system of the Thomas Haase Group, including the companies affiliated with the Thomas Haase Group.

The Thomas Haase Group's Supplier Code of Conduct for suppliers and business partners is based on the principles of internationally recognized standards for responsible corporate governance.

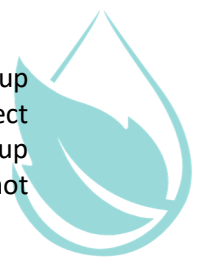
These include, among others

- the Global Compact of the United Nations (UN),
- the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD)
- the labor and social standards of the International Labor Organization (ILO) (see Appendix 1)
- Universal Declaration of Human Rights
- United Nations Global Compact (UNGC)
- UN Guiding Principles for Business and Human Rights
- UN Convention on the Rights of the Child
- UN Women's Rights Convention
- OECD Guidelines for Multinational Enterprises
- Core labor standards of the International Labour Organization (ILO)
- Paris climate protection agreement
- Minamata Convention
- Basel Convention
- Stockholm Convention on Persistent organic pollutants (POPs Convention)

This results in the sustainable principles of this Supplier Code of Conduct for economic, ecological and social action, which shape the way our organization thinks and does business.

Any activity performed on behalf of the Thomas Haase Group must be in full compliance with this Supplier Code of Conduct and all laws, rules, regulations and guidelines applicable to the activity in question. We expect our employees, as well as our contractors, to act with safety and professionalism at all times while acting on behalf of the Thomas Haase Group, to refrain from any actions that could result in a conflict of interest, and to treat others with respect, fairness and dignity.

The Supplier Code of Conduct is an integral part of all contracts between the Thomas Haase Group and suppliers or business partners. If a supplier or business partner fails to comply with any aspect of the Supplier Code of Conduct, it is expected to take corrective action. The Thomas Haase Group reserves the right to terminate its contracts with those suppliers or business partners who cannot demonstrate that they are complying with the regulations.



The partnership-based cooperation with our suppliers or business partners, taking into account the sustainable principles of this Supplier Code of Conduct, is for us one of the supporting pillars for the continuation of our success story. We thank you for continuing to give compliance and integrity top priority in your cooperation with the Thomas Haase Group.



## Scope

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When selecting suppliers and business partners, the Thomas Haase Group essentially focuses on total cost, product safety and quality, environmental awareness, and compliance with our requirements of the underlying Supplier Code of Conduct. In the long term, we only work with suppliers who share our values regarding sustainability. The Thomas Haase Group is committed to conducting its business in compliance with applicable laws, policies and regulations with integrity.

This Supplier Code of Conduct represents minimum standards for our business relationship. The Thomas Haase Group has a zero-tolerance policy when it comes to unethical business behavior such as corruption, bribery and forced or child labor. We expect our suppliers and business partners, including their employees, agents and subcontractors, to respect and comply with the standards of this Supplier Code of Conduct when doing business with, for or in relation to the Thomas Haase Group. It is the responsibility of suppliers and Business Partners to train their employees, agents and subcontractors in accordance with the requirements of this Supplier Code of Conduct.

This Supplier Code of Conduct applies to all suppliers and business partners of the Thomas Haase Group, consisting of Haase Holding GmbH & Co. KG and its affiliated companies within the meaning of Section 15 AktG. These include, among others, Laverana GmbH & Co. KG, Emlyn GmbH & Co. KG and Laverana Digital GmbH & Co. KG.



## **Compliance with laws, rules and regulations**

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Compliance with the law is, of course, one of our fundamental principles. As part of our corporate responsibility, we also expect this from our suppliers and business partners.

### **Fighting corruption and bribery**

Suppliers or business partners undertake not to make, authorize or offer any inducements such as bribes, kickbacks or other payments of money or anything of value from any person for the purpose of initiating or continuing business or obtaining any other business decision that is in any way related to the Thomas Haase Group.

This obligation applies to employees of the Thomas Haase Group, as well as employees or representatives of governmental, public or international organizations or other third parties (in the public or private sector).

Suppliers or business partners are required to comply with the German Criminal Code, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all locally applicable anti-bribery laws.

### **Antitrust and competition law**

Antitrust and competition laws are designed to protect consumers and competitors from unfair business practices and to promote and ensure healthy competition.

The supplier or business partner shall ensure that its business practices comply with applicable antitrust and competition law. The supplier or business partner shall not enter into any inadmissible agreements with competitors and shall not engage in any actions that could unfairly impair competition. This includes, for example, price fixing or market sharing.

### **Handling confidential information**

The Thomas Haase Group requires its suppliers or business partners to protect confidential information entrusted to them by the Thomas Haase Group. Confidential information may only be used and disclosed in the manner authorized by the Thomas Haase Group.

Furthermore, the supplier or business partner protects and secures intellectual property such as trademarks, patents, designs and know-how of the Thomas Haase Group as confidential information.

### **Compliance with data protection regulations**

The Thomas Haase Group expects its suppliers or business partners to comply with all legal data protection requirements of the respective Thomas Haase Group company as well as its data protection policies and all contractually agreed obligations, such as the implementation of appropriate data protection measures. In addition, the supplier respects data protection based on European (EU-DSGVO) and national (BDSG and, if applicable, state data protection) requirements.

### **Intellectual Property**

The supplier or business partner warrants to respect the industrial property rights of the Thomas Haase Group - no use of the trademarks or reference to them is permitted without the express consent of the Thomas Haase Group.

The supplier or business partner warrants that the use of the services provided by it and/or on its behalf does not infringe the rights of third parties or depend on the rights of third parties. The supplier or business partner shall indemnify the Thomas Haase group on first demand against any claims asserted by third parties against the Thomas Haase group due to the contractual use of the

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services provided by the supplier and shall compensate the Thomas Haase group for any damages incurred by the Thomas Haase group due to the claims asserted by the third party, including any court costs and lawyers' fees incurred for the legal defense. In all other respects, the statutory provisions shall apply.

## **Corporate responsibility**

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We inextricably link our claim to conduct all business in an ethically and legally compliant manner with respect for human rights as well as respect for the social norms, traditions and social values of the countries in which we do business. The Thomas Haase Group expects suppliers or business partners to comply with the following basic principles in particular:

### **Prohibition of child labor**

Child labor and any form of exploitation of children are therefore expressly prohibited within the value chain of the Thomas Haase Group. The definition of "child labor" is based on the principles of the United Nations Global Compact and the International Labor Organization (ILO). These conventions regulate internationally valid age limits. If a higher minimum age for employment applies in the country in which the supplier or business partner concerned has its operating site, this must be complied with. Furthermore, the supplier is required not to delegate hazardous work to employees under the age of 18.

### **Prohibition of discrimination**

The suppliers or business partners of the Thomas Haase Group do not discriminate against or favor anyone on the basis of ethnic, national or social affiliation, skin color, gender, religion, ideology, age, disability, sexual orientation, political views, insofar as these are based on democratic principles and tolerance of those who think differently, or any other legally protected characteristics, insofar as this does not conflict with mandatory law.

### **Prohibition of forced labor and ill-treatment**

Forced labor - in all its forms - is prohibited. Suppliers or business partners are expected to treat their employees fairly, free from sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse, and without threat of such treatment.

### **Working hours and minimum wages**

Working hours shall comply with applicable national laws, regulations and International Labor Organization (ILO) standards.

Suppliers or business partners shall ensure that their employees are adequately remunerated, at least in line with the legally valid minimum to be guaranteed. If there are no statutory or collectively agreed regulations, the remuneration is based on the industry-specific, locally customary collectively agreed remuneration and benefits that ensure an appropriate standard of living for the employees and their families.

### **Occupational safety and health protection**

The suppliers or business partners of the Thomas Haase Group comply with the respective applicable legal requirements for health and safety at work. They support the further development and improvement of working conditions. This includes the protection of employees from chemical, physical, mechanical and psychological hazards at the workplace and the infrastructure available for this purpose. It also includes appropriate controls, safe work procedures, preventive maintenance and protective measures (e.g. PPE, instructions, guidelines, emergency plans, etc.). To objectively demonstrate compliance with the principles of prohibition of child labor, prohibition of discrimination, prohibition of forced labor and mistreatment, regulation of working hours and minimum wages, and general occupational health and safety, we encourage our suppliers or



business partners to seek or maintain certification according to a common social standard (e.g. SA 8000).

#### **Freedom of association and right to collective bargaining**

Employees may establish and/or join employee representative bodies and trade unions of their choice. The right to freedom of association and the right to collective bargaining (e.g. collective bargaining) must be recognized and upheld. An effective exchange of information between employees and their representatives must be ensured by our suppliers and business partners.

#### **Product quality and product safety**

The supplier or business partner shall ensure that all products, raw materials and services provided to the Thomas Haase Group meet the agreed requirements and specifications and are in compliance with applicable laws and regulations.

The supplier or business partner shall notify the Thomas Haase Group immediately if it discovers or suspects that there are regulatory, qualitative, safety or labeling problems in connection with the products supplied.

We expect all our suppliers and business partners to have a quality management system that is relevant to their business activities (e.g. according to DIN EN ISO 9001).

### **Environmental and climate protection**

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#### **Compliance with legal requirements**

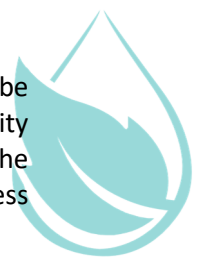
Environmental aspects are increasingly playing a role worldwide, especially climate change. The Thomas Haase Group expects suppliers and business partners to address environmental issues and to comply with all legal requirements concerning the environment and sustainability. We expect all our suppliers and business partners to have an environmental management system that is relevant to their business activities (e.g. according to DIN EN ISO 14001 or EMAS). The business partner's operations must also comply in particular with the requirements of waste legislation and immission and water protection.

All regulations regarding hazardous substances must be complied with by the supplier or business partner. This applies in particular to the storage, handling and disposal of hazardous materials. Employees must be instructed on the handling of hazardous materials and substances. Hazardous substances include in particular mercury and mercury compounds, mercury waste and other hazardous waste as defined by the Basel Convention.

#### **Increase energy and resource efficiency**

The suppliers and business partners of the Thomas Haase Group are required to use environmental resources as sparingly as possible, to avoid hazards to people and the environment, and to continuously improve all procedures and processes with the aim of continuously monitoring and reducing environmental pollution and energy consumption.

Environmental pollution is to be avoided as far as this is possible by proportionate means, or to be reduced in any case. Environmental and climate protection as well as the promotion of biodiversity is an ongoing task that can only be met by constantly improving the level of protection through the permanent reduction of resource consumption and waste reduction. The supplier or business partner shall make appropriate efforts for this within the scope of its business activities.



## **Animal welfare**

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The Thomas Haase Group has always been committed to animal welfare through, among other things, involvement with the NATRUE cosmetics association and the German Animal Welfare Association. Suppliers and business partners must comply with all applicable local and national laws and regulations related to animal welfare. We expect our suppliers and business partners not to perform, have performed or commission any animal testing. Suppliers and business partners of the Thomas Haase Group are obliged to inform their contact person within the company immediately should animal testing of raw materials used by the Thomas Haase Group become necessary due to official orders (e.g. REACH). Together with the animal protection organization PETA, we will campaign for an alternative.

## **Compliance**

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Suppliers used by the supplier or business partner to provide services along the supply chain must comply with the standards set out in this Supplier Code of Conduct. The Supplier or Business Partner shall inform them of the contents and require the requirements and standards set forth herein.

Furthermore, the implementation and monitoring of the aforementioned standards must be ensured by means of an appropriate in-house procedure at suppliers and business partners and their subcontractors along the supply chain.

## **Legal consequences of violations of the Supplier Code of Conduct of the Thomas Haase Group**

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The Thomas Haase Group reserves the right to conduct audits or reviews to ensure that you are complying with laws, rules and standards and will take appropriate action regarding the business relationship if there is cause for concern. Furthermore, the Thomas Haase Group expressly reserves the right to terminate the business relationship if the supplier or business partner violates the principles of the Supplier Code of Conduct and no measures are taken to remedy such violations or the violations are systematic.

Complaints or indications of possible violations of this Supplier Code of Conduct can be reported at any time to [compliance@lavera.de](mailto:compliance@lavera.de) or to our external ombudsman:

Jörn Beyer  
HLP. HEIERMANN - LOSCH - ATTORNEYS AT LAW  
Marienstraße 9-11  
30171 Hanover  
T 0511. 26 29 38-52  
F 0511. 26 29 38-99  
E [lavera-ombudsmann@hlp-rae.de](mailto:lavera-ombudsmann@hlp-rae.de)

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## **Appendix 1: Social responsibility**

The fundamental objective of the **International Labor Organization (ILO)** is to safeguard world peace by improving the working and living conditions of all people with the aid of globally recognized social standards. The basic principles are freedom of association and the right to collective bargaining, elimination of forced labor, abolition of child labor and prohibition of discrimination in respect of employment and occupation. A total of 188 conventions and 198 recommendations exist to date (as of Jan. 26, 2023).

All ILO conventions can be viewed at <http://www.ilo.org/ilolex/german/docs/convdisp1.htm>.

Listing of all conventions relevant in the present document:

- Convention 1 - Working Time, 1919
- Convention 14 - weekly rest day, 1921
- Convention 26 - Procedure for the Fixing of Minimum Wages, 1928
- Convention 29 - Forced Labor, 1930
- Convention 64 - Regulation of Written Contracts of Employment of Indigenous Workers, 1939.
- Convention 79 - Night work of young persons, 1946
- Convention 87 - Freedom of Association and Protection of the Right to Organize, 1948
- Convention 98 - Right to Organize and Collective Bargaining, 1949
- Convention 100 - Equal Remuneration, 1951
- Convention 105 - Abolition of Forced Labor, 1957
- Convention 111 - Discrimination (Employment and Occupation), 1958
- Convention 131 - Minimum Fixed Wage, 1970
- Convention 135 - Employees' Representatives, 1971
- Convention 138 - Minimum age, 1973
- Convention 142 - Development of the Labor Force, 1975
- Convention 143 - Guest workers, 1975
- Recommendation 143 - Protection and Facilitation of Workers' Representatives in the Workplace, 1971
- Recommendation 146 - Minimum Age for Admission to Employment, 1973.
- Recommendation 191 - Maternity protection, 2000
- Recommendation 198 - Employment Relationship, 2006
- Recommendation 200 - HIV and AIDS and the world of work, 2010
- Convention 154 - Collective and Collective Bargaining, 1981
- Convention 155 - Occupational Safety and Health, 1981
- Convention 158 - Employment Relationship, 1982
- Convention 159 - Vocational Rehabilitation and Employment of the Disabled, 1983.
- Recommendation 164 - Health protection and medical care, 1987.
- Convention 182 - Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, 1999.

