



Corporate Due Diligence in the Supply Chain
Supplier Code of Conduct

Preamble

Economic success and social responsibility are inseparably linked. Responsible and ethical behavior towards employees, business partners, society, and the environment is an essential part of the value system of the Thomas Haase Group, including its affiliated companies.

The Thomas Haase Group's Code of Conduct for suppliers is based on internationally recognized standards for responsible corporate governance, such as the United Nations (UN) Global Compact, the OECD Guidelines for Multinational Enterprises, and the labor and social standards of the International Labour Organization (ILO), as well as other legal requirements for sustainable supply chains. These form the basis for the sustainable principles of this code, which shape the economic, ecological, and social actions of our organization.

Every activity for the Thomas Haase Group must fully comply with this Code of Conduct as well as all relevant laws, regulations, and guidelines. We expect our employees and contractors to always prioritize safety and professionalism, avoid actions that could lead to conflicts of interest, and treat others with respect, fairness, and dignity.

The Code of Conduct is part of all contracts between the Thomas Haase Group and its suppliers. If a supplier fails to comply with any aspect of the code, they are expected to take appropriate remedial actions and verify their effectiveness and provide proof upon request. The Thomas Haase Group reserves the right to terminate contracts with suppliers who cannot demonstrate compliance with the code.

Partnership collaboration with our suppliers, considering the sustainable principles of this Code of Conduct, is a cornerstone of our success. We thank you for prioritizing compliance and integrity in your collaboration with the Thomas Haase Group.

Scope

When selecting suppliers, the Thomas Haase Group primarily focuses on total costs, product safety and quality, environmental awareness, human rights, and compliance with the requirements of our underlying 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 accordance with applicable laws, guidelines, and regulations under the premise of integrity.

This Code of Conduct sets certain minimum standards. The Thomas Haase Group pursues a zero-tolerance policy towards unethical business behavior such as corruption, bribery, and forced or child labor. We expect our suppliers, including their employees, representatives, and subcontractors, to respect and adhere to the standards of this Code of Conduct in business dealings with, for, or relating to the Thomas Haase Group. It is the responsibility of the suppliers to train their employees, representatives, and subcontractors according to the requirements of this Code of Conduct.

This 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 § 15 AktG, including Laverana GmbH & Co. KG, Emlyn GmbH & Co. KG, and Laverana Digital GmbH & Co. KG.

Sub-suppliers used by the supplier or business partner for performance along the supply chain must adhere to standards corresponding to this Supplier Code of Conduct. The supplier or business partner must inform them of the content and demand compliance with the requirements and standards listed here.

Compliance with Laws, Regulations, and Provisions

Compliance with laws is naturally one of our fundamental principles. As part of our corporate responsibility, we expect the same from our suppliers.

Anti-Corruption and Anti-Bribery

Our suppliers commit not to offer, approve, or provide any benefits such as bribes, kickbacks, or other monetary payments or valuables to individuals for the purpose of initiating or continuing business activities or obtaining other business decisions 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).

Our suppliers are required to comply with the German Penal Code, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and all locally applicable anti-corruption laws.

Antitrust and Competition Law

Antitrust and competition law protects consumers and competitors from unfair business practices and promotes healthy competition.

The supplier guarantees that its business practices comply with applicable antitrust and competition laws. They do not engage in prohibited agreements with competitors and do not take actions that could unfairly influence competition, such as price-fixing or market sharing.

Handling Confidential Information

The Thomas Haase Group expects its suppliers to protect the confidential information entrusted to them. This information may only be used and disclosed in the manner authorized by the Thomas Haase Group.

Furthermore, the supplier is committed to securing and protecting the intellectual property of the Thomas Haase Group, including trademarks, patents, designs, and know-how, as confidential information.

Compliance with Data Protection Regulations

The Thomas Haase Group expects its suppliers to comply with all legal data protection requirements of the respective Thomas Haase Group company, as well as their data protection policies and contractual obligations, including the implementation of appropriate data protection measures. Additionally, the supplier commits to respecting data protection in accordance with European (EU-GDPR) and national (BDSG and, if applicable, country-specific) regulations.

Intellectual Property

The supplier commits to respecting the industrial property rights of the Thomas Haase Group. Without the express consent of the Thomas Haase Group, the use of these property rights, particularly trademarks or naming as a reference, is not permitted.

The supplier ensures that the services provided by them or on their behalf do not infringe on third-party rights or depend on such rights. Should the Thomas Haase Group be claimed by third parties due to the contractual use of supplier services, the supplier will indemnify the Thomas Haase Group upon first request and compensate for all damages, including court costs and attorney fees incurred by the Thomas Haase Group. Otherwise, the statutory provisions apply.

Corporate Responsibility

Our commitment to conducting all business in an ethical and legally compliant manner is inseparably linked with the respect for human rights and the respect for the social norms, traditions, and societal values of the countries in which we conduct business. The Thomas Haase Group expects suppliers to particularly adhere to the following fundamental principles:

Prohibition of Child Labor

Child labor and any form of exploitation of children are strictly 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 Labour Organization (ILO), which set internationally valid minimum age limits. If a higher minimum age for employment applies in the country where the supplier operates, it must be observed. Additionally, the supplier must not assign hazardous work to employees under 18 years of age.

Prohibition of Discrimination

Suppliers of the Thomas Haase Group do not discriminate against or favor anyone based on ethnic, national, or social origin, skin color, gender, religion, belief, age, disability, sexual orientation, or political opinion, provided it is based on democratic principles and tolerance towards different views, or other legally protected characteristics, unless mandatory legal provisions prevent this.

Prohibition of Forced Labor and Mistreatment

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

Working Hours and Minimum Wages

Working hours must comply with the applicable national laws, regulations, and the standards of the International Labour Organization (ILO).

Suppliers ensure that their employees receive appropriate compensation that at least corresponds to the legally valid and guaranteed minimum. If statutory or collective bargaining regulations are not available, remuneration is based on industry-specific, locally customary collective wages and benefits that ensure an adequate standard of living for employees and their families.

Occupational Safety and Health Protection

Suppliers of the Thomas Haase Group comply with the applicable legal requirements for safety and health protection at the workplace. They support the development and improvement of working conditions. This includes protecting employees from chemical, physical, mechanical, and psychological hazards at the workplace and the available infrastructure. This also includes appropriate controls, safe work processes, preventive maintenance, and protective measures (e.g., PPE, instructions, guidelines, emergency plans, fire protection measures, first aid concepts, etc.). To objectively demonstrate compliance with the principles prohibiting child labor, discrimination, forced labor and mistreatment, regulating working hours and minimum wages, as well as general occupational safety and health protection, we encourage our suppliers to maintain certification according to a recognized occupational safety and health (e.g., ISO 45001) and/or social standard (e.g., SA 8000).

Product Quality and Product Safety

The supplier ensures that all products, raw materials, and services provided to the Thomas Haase Group meet the agreed requirements and specifications and comply with applicable laws and regulations.

The supplier promptly informs the Thomas Haase Group if they identify or suspect regulatory, quality, safety, or labeling-related issues with the supplied products.

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

Environmental and Climate Protection

Compliance with Legal Requirements

Globally, environmental aspects play an increasingly important role, especially climate change and the effort to minimize CO₂ emissions. The Thomas Haase Group expects suppliers to engage with environmental issues and comply with all legal requirements concerning the environment and sustainability. In this context, we ask our suppliers to support us in implementing measures arising from environmental and sustainability legislation obligations (e.g., EUDR). We further expect all our suppliers to have an environmental management system relevant to their business activities (e.g., according to DIN EN ISO 14001 or EMAS). The operations of the business partner must also meet the requirements of waste law, as well as emissions and water protection.

Increasing Energy and Resource Efficiency

Suppliers of the Thomas Haase Group are encouraged to handle environmental resources carefully, avoid hazards to humans and the environment, and continuously improve all procedures and processes with the goal of continuously monitoring and reducing environmental impacts and energy consumption.

Environmental impacts should be avoided or at least reduced as far as is reasonably possible. Environmental and climate protection, as well as the promotion of biodiversity, are continuous tasks that can only be met by continuously improving the level of protection through the permanent reduction of resource consumption and waste. The business partner makes reasonable efforts within the framework of their business activities.

Animal Welfare

The Thomas Haase Group has long been committed to animal welfare, including through involvement with the cosmetics association NATRUE and the German Animal Welfare Association. Suppliers must comply with all applicable local and national laws and regulations concerning animal welfare. We expect our suppliers not to conduct, have conducted, or commission animal testing. Suppliers of the Thomas Haase Group are obliged to inform their contact person within the company immediately should animal testing on raw materials used by the Thomas Haase Group be required due to official orders (e.g., REACH). Together with the animal protection organization PETA, we will advocate for an alternative.

Supply Chain Management

The Thomas Haase Group operates active and software-supported supply chain management. We view our supply chains holistically with the aim of analyzing supply risks as well as environmental and human rights-related risks along our supply chains and minimizing or ideally eliminating them through appropriate measures as far as possible. We would like to inform you that within the framework of our multi-stage analysis system, general country or industry risks are identified for you as a supplier, which require further measures (e.g., conducting assessments in the form of questionnaires). Should this be the case, we ask for your active support in this regard.

Legal Consequences of Violations of the Supplier Code of Conduct of the Thomas Haase Group

The Thomas Haase Group reserves the right to conduct audits or reviews to ensure that you comply with laws, rules, and standards and will take appropriate measures 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 violates the principles of the Code of Conduct and no measures are taken to remedy such violations or if the violations occur systematically. Upon request, the supplier must demonstrate how they comply with the requirements of this code.

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

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