

# Third Party Code



# Elida Beauty Third Party Code

Our Third Party Code embodies our commitment to responsible, transparent and sustainable business, in order to deliver excellence to our consumers and maintain the trust of everyone we work with. Our third parties are an extension of our business. We commit to working with them to help embed sustainability through our three pillars of **Ethical Conduct, People and Planet.** 

Suppliers of Elida Beauty (organisations who invoice Elida Beauty for goods or services) are covered by our Supplier Code. This Third Party code applies to our other third party business partners ("third parties") with whom we have contracts, including business partners that we directly contract with to bring our products to consumers around the world, and charities, NGOs and social enterprises with whom we partner.

We do not require our third parties to adopt the Elida Beauty third party Code but we do require our third parties to confirm to Elida Beauty that they meet, or exceed the standards contained in our third party Code and will comply with the requirements set out in our third party Code. To this end, third parties are expected to develop and implement their own appropriate internal business processes (including policies, training, governance and compliance programmes) to ensure they are able to meet, or exceed the standards contained in our Third Party Code and remain in compliance with it throughout the duration of their relationship with Elida Beauty.

Our Third Party Code is rooted in international standards, regulations and conventions that are widely used and aligned with similar expectations held by other companies. These include but are not limited to:

- International Labour Organisation Conventions and Protocols
  UN Guiding Principles on Business and Human Rights
  OECD Guidelines for Multinational Enterprises
  Business Principles for Countering Bribery produced by Transparency International
  UN Sustainable Development Goals
  Ethical Trading Initiative
  - Sapin II

Where your contract with Elida Beauty includes a requirement to meet a higher standard than our Third Party Code, that higher standard will take precedence.

# **Ethical Conduct**

We expect our third parties to know and comply with all laws and regulations, national and international, relevant to their business.

# Anti-Bribery and Corruption

All forms of corruption, including bribery (whether of public officials or private individuals), extortion, the making of facilitation payments, fraud, theft and embezzlement are prohibited and prevented through adequate and proportionate procedures. Any breach of this requirement in connection with Elida Beauty business must be promptly disclosed to Elida Beauty.

Third parties are prohibited from offering anything of value to Elida Beauty employees to improperly obtain or retain business or influence decisions about how Elida Beauty assesses performance.

Gifts or hospitality offered to Elida Beauty employees are, in all cases, legitimate, proportionate and respectful of Elida Beauty's internal policies which limit significantly the acceptance of gifts and hospitality.

Elida Beauty employees are prohibited from soliciting any improper advantages from any third party we do business with. Any attempt by Elida Beauty employees to solicit bribes from a third party must be reported to us through our speak-up channels.

## **Avoiding Conflicts of Interest**

All business transactions are free of conflicts of interest.

Any material ownership or beneficial interest in a third party's company by a public official, representative of a political party, Elida Beauty employee or their relatives are declared to Elida Beauty prior to any business relationship with Elida Beauty so that Elida Beauty can take appropriate action.

Any other conflict of interest in any business dealings with Elida Beauty, of which the third party is aware, is declared to Elida Beauty to allow Elida Beauty the opportunity to take appropriate action.

# Accurate Records, Anti-Money Laundering and Economic Sanctions Compliance

All business and commercial dealings are transparently performed and accurately recorded in a timely manner. Confidential information in a third party's possession regarding Elida Beauty, or any other company, is not used to either engage in, or support insider trading. All economic sanctions, anti-money laundering and anti-tax evasion legislation and rules must be complied with.

Any suspicions of occurrence of any of these issues in relation to transactions with Elida Beauty must be promptly reported to us and effective steps taken to mitigate risks.

# Safeguarding Elida Beauty's Information and Property

Elida Beauty's confidential information, know-how and intellectual property are respected and safeguarded. All information provided by Elida Beauty that is not in the public domain shall be deemed confidential, only used for its intended and designated purpose and not shared with any other third party unless expressly permitted by Elida Beauty.

## **Competitor Information**

Competitor information is obtained and used legitimately and in compliance with all applicable laws and regulations. No attempts are made to divulge to Elida Beauty, or to any other party, any commercially sensitive or confidential information about their competitors or the third party's competitors.

## Data Ethics and Privacy

Personal data is collected, processed, stored, transferred and disposed of in line with applicable laws. The risk to individuals when using their personal data is always considered and steps are taken to mitigate those risks and to restrict the collection or use of personal data to only the purpose it is being collected for.

# Service Specifications and Quality

Services meet agreed specifications (where covered by a specification) and quality and safety industry norms for such items, as well as such other quality and safety standards as agreed between us, including adhering to the geographic scope of coverage agreed in the contract. Services also comply with all applicable legal and regulatory requirements. Third Party business partners are responsible for meeting these specifications, quality and safety standards and for legal and regulatory compliance.

# People

We expect our third parties to know and comply with all laws and regulations, national and international, relevant to their business.

# Work is Voluntary

Employment is accepted and work is conducted on a voluntary basis. Forced labour will never be used, including slavery, trafficked labour, indentured labour, bonded labour or other forms including mental and physical coercion. Workers:

- Enter employment freely, are not required to surrender any identity papers and are not required to pay any fee or deposit
- Are free to terminate their employment after a reasonable notice period without penalty
- Have freedom of movement and are not confined to either work premises or to provided accommodation

# Appropriate Age

All workers are of an appropriate age and young workers are protected.

Under no circumstances are individuals employed under the age of 15 or under the local legal minimum age for work or mandatory schooling, whichever is higher.

In all circumstances, the health and safety of young workers (between 15 and 18 years of age) is considered and protected.

The goals and requirements set out in the International Labour Organization Worst Forms of Child Labour Convention are met.

# Freely Agreed Terms of Employment

Work is conducted on the basis of freely agreed and documented terms of employment provided to the worker that:

- Respect their legal and contractual rights
- Include key areas such as hours, overtime, pay, benefits, leave, disciplinary and grievance systems
- Are in a language understood by the worker

Any changes in terms and conditions are agreed in writing by both worker and employee



#### Fair Wages

All workers are paid fair wages, on time, regularly and in full. Compensation, including wages, overtime, benefits and paid leave meets or exceeds legal minimum standards, and collective bargaining agreements are honoured.

Workers paid on volume output or similar are able to earn the higher of minimum or collectively agreed hourly wages.

All components of compensation are clearly communicated, including legally mandated deductions. Any other deductions are only made with the express and written consent of workers.

#### Free From Discrimination

All workers are treated equally and with respect and dignity without any form of discrimination. Particular attention is paid to the rights of workers most at risk of discrimination.

There is no discrimination on any illegal grounds in employment (including hiring), any aspects of training, personal and professional development, compensation, advancement, discipline, employment termination or retirement.

Pregnancy testing and mandatory contraception are not tolerated. Where health screening is mandated under local laws, the results cannot be used to discriminate against workers.

#### Free From Harassment

All workers are free from harassment and abuse. No worker is subject to any physical, sexual, psychological or verbal harassment, abuse or other form of intimidation.

## Reasonable Working Hours

Workers are not required to work more than the regular and overtime hours according to local legal requirements. Total weekly working hours including overtime must not exceed 60 hours for non-management workers even if local law would otherwise allow it. All overtime is on a voluntary basis.

Workers are entitled to at least 24 consecutive hours of rest per week, or 48 hours in a 14 day period to meet one-off continuity needs.



# Freedom of Association

All workers can freely exercise their right to form or join a union, to seek representation and collectively bargain and to exercise related rights, and can do so without impediment, fear of intimidation, harassment or obtaining prior approvals, unless legally required.

Collective bargaining negotiations are entered into in good faith when requested from any legally recognised representative group of workers and collective agreements are concluded and implemented.

Worker representatives are not discriminated against, and unfair labour practices do not take place against them because of their role as worker representatives. They have reasonable access to carry out their representative functions in the workplace.

Where local law sets restrictions on the right to freedom of association and collective bargaining, alternative forms of worker representation, association and bargaining are allowed.

## Health and Safety

All workers operate in a safe and healthy work environment that identifies and reduces risks to prevent accidents, injuries and illnesses (either physical or mental) linked with the employer's operations. This includes effective policies and procedures including (for example) regular safety drills, regular safety evaluations at site level, an effective Health and Safety committee and a named member of Senior Management having responsibility for the safety plan of each site.

#### Access to Grievance Mechanisms and Remedies

All workers have access to grievance mechanisms with fair procedures and remedies. The grievance mechanism is well-communicated, confidential, effective, timely and respectful. No retaliation will be tolerated.

The grievance mechanisms will be in line with the UN Guiding Principles on Business and Human Rights.

# Planet

We expect our third parties to know and comply with all laws and regulations, national and international, relevant to their business.

#### Protect and Regenerate Nature

Business is conducted in a manner which protects, preserves and regenerates nature, including biodiversity. Water consumption is reduced, particularly in areas of high water stress, and wastewater discharge is appropriately managed.

Current and valid legal permits and requirements relating to planning, development and business operations, with respect to the protection of the environment, nature and biodiversity, are held and complied with.

Applicable laws and permits relating to water are complied with.

#### **Climate Action**

Greenhouse gas (GHG) emissions are reduced in line with the goals of the Paris Agreement that limits global warming to well below 2 degrees Celsius compared to pre-industrial levels

All applicable legal requirements are complied with and permits held with respect to GHG emissions management and reduction.

An environmental management system is in place to identify and mitigate GHG emissions.



# Waste-free World

The generation of waste is reduced on an ongoing basis. Plastic use and waste are reduced to help create a transparent and circular economy for plastics.

Applicable laws and permits relating to the storage, handling and disposal of waste directly or through waste sub-contractors are complied with.

Waste is stored, handled, transported and disposed of in a way that protects the health and safety of people and also protects the environment.

All applicable legal requirements with respect to plastic feedstock sourcing, plastics production, storage, transport and end-of-life management are complied with.

#### Data

All required data is shared with Elida Beauty where needed to allow Elida Beauty to use that data (on an anonymised basis, where the reporting or requirements allow anonymity) to comply with the reporting and disclosure requirements of all relevant human rights, environmental protection (including GHG emissions) and supply chain due diligence laws and regulations.