

# THIRD PARTY CODE OF CONDUCT

Empowering healthier living

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### 1. Objective and scope

At Cooper Consumer Health (hereinafter jointly or individually referred to as "CCH" or "we"), we are dedicated to *Empower Healthier Living* ("Purpose") for all, not just through our self-care products but also through our operations and impact on the world around us. In order to contribute positively to our Purpose, we want to work with the highest ethical trading standards and ensure that our products are produced in an environmentally responsible manner, using sustainable materials and practices that minimize waste and pollution. At CCH, we want to be a 'force for good': we aim to leave the world a little better than we found it by developing sustainable healthcare brands and supporting consumers to take care of themselves.

To contribute to our Purpose, we have created this Third Party Code of Conduct ("Code") which is applicable to third parties and their employees ("Third Parties") contracting or engaging with any entity of the CCH Group providing goods or services to CCH.

By signing a contract with CCH, each Third Party automatically adheres to similar working standards and business ethics as described in this Code.

To the extent there is a conflict between the contract and this Code, parties agree that this Code will prevail over the contract with respect to such conflict.

#### 2. Governance

The Code sets forth our standards for business ethics which this code of conduct is approved and endorsed by our highest management bodies. The Code embodies CCH's values of integrity and accountability and enables us to execute against our shared responsibility to create healthier futures.

CCH will review the Code at least on an annual basis to reflect new developments in policies, laws, and regulations and to ensure that our Code aligns with our business activities and structures. Any changes to this Code will be communicated via CCH's corporate website (see link here).

### 3. The Standards

All our Third Parties must comply with applicable laws and regulations of their country of operation, including laws relating to human rights, all kind of employment matters, bribery and corruption, quality, health, safety, and environment and/or animal welfare. In countries where local laws and regulations are in conflict with the Standards listed below, Third Parties should seek ways to abide by the principles that provide the highest protection to their workers and environment in compliance with the applicable laws and regulations.

Our Code is informed by the International Bill of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights.



### 3.1 Employee matters

Third Parties must treat all employees fairly and with dignity, and must observe the following specific requirements:

### a. Eliminating forced or compulsory labour

Third Parties shall not use forced or compulsory labor practices, and must take reasonable steps to ensure they do not contribute to or benefit from the use of forced or compulsory labor in their organization or anywhere in their supply chain. Third Parties must implement procedures to ensure they comply with the most stringent laws on slavery and human trafficking, regardless of location.

### b. No child labour

Third Parties shall not use any child labour that would violate national and/or international laws and regulations. Any forms of exploitation of children are forbidden. Third Parties must establish robust age-verification mechanisms as part of the recruitment process. Third Parties are obliged to inform CCH immediately if any child labour is detected in its own workplaces or at any of its sub-contractors.

### **c.** Living wages and working hours

Third Parties must fairly compensate their employees by paying wages, benefits and conditions of work, representing fair remunerations with transparent payment terms. These wages must be in accordance with applicable wage laws. Third Parties are expected to provide all workers with written and understandable information about their terms and conditions of employment, including payment.

### d. Safe and healthy working environments

Third Parties are expected to provide a safe, hygienic and healthy working environment for their employees to prevent accidents and injury at work. Third Parties must provide their employees, including new or reassigned workers, regular and recorded health and safety training.

Additionally, Third Parties shall ensure safe storage of chemicals (if applicable) and robust fire safety and prevention programs, including but not limited to emergency plans of which employees are made aware.

### e. Legal Rights to collective Bargaining

Third parties must respect freedom of association and the right to collective bargaining, ensuring that employees can freely express concerns and negotiate working conditions.

# f. Non-discrimination and equal opportunities

Third Parties shall refrain from any discriminatory practices either with regard to recruitment, promotion, pay or bonuses, or in their general conduct in the workplace. Third Parties' policies,



procedures and practices should be applied fairly, should avoid negative impact on any specific group of employees or potential employees and, wherever possible, should promote diversity, inclusion non-discrimination and harassment, whether on the grounds of race, disability, religious belief, sexual orientation, age or gender.

### g. Harassment / workplace violence

Third Parties are committed to providing a workplace that is free from harassment and intimidation and is safe for all employees. Third Parties must not tolerate any harassing conduct that interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment. Third Parties shall have a zero-tolerance policy for workplace violence. Third Parties shall prohibit harassing, offensive or threatening language in any forms of communication.

# h. Employee Privacy

Third Parties shall protect the confidentiality and security of Personal Data¹ of its employees and other data subjects by ensuring implementation of appropriate safeguards. Any disclosure of Personal Data shall be limited to those purposes for which it was received to ensure that employees' (or other individuals) privacy rights are protected. Any disclosure of Personal Data shall be in accordance with the applicable privacy laws.

### 3.2 Ethical Business Practices

Third Parties are strictly forbidden to engage, directly or indirectly, in all forms of bribery and corruption to employees of CCH or any other third party. Third Parties shall comply with and adhere to applicable anti-bribery and anti-corruption laws and regulations and to be able to demonstrate compliance when requested. This also includes compliance with applicable anti-money laundering laws and regulations. Additionally, Third Parties are expected not to offer to employees of CCH any gifts or any other kind of personal benefit resulting from the relationship with the Third Party other than those that are very limited in value not exceeding an amount of EUR 50.

Furthermore, Third Parties shall avoid any actual or perceived conflicts of interest in business dealings. In case the Third Party becomes aware of a conflict of interest, they shall notify CCH.

### 3.3 Quality, Health, Safety, and Environment

Third Parties shall comply with all applicable quality, health, safety, and environment regulations. All required permits, licenses and registrations shall be obtained, maintained and kept up-to-date. Third Parties shall fulfil their operational and reporting requirements.

Third Parties shall recognize and manage their environmental impact, and are expected to take environmental concerns into consideration during each phase of its production or service providing to CCH.

<sup>&</sup>lt;sup>1</sup> As defined in the General Data Protection Regulation (EU)2016/67, as amended from time to time.



### a. Waste and Emissions

Third Parties shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment in accordance with local laws and regulations.

# b. Responsible management of environmental impacts

Third Parties are expected to avoid, or where unavoidable, to minimize or mitigate, air emissions and water discharges, and to safely treat, store, transport, use and discharge or dispose of solid waste and by-products. Where possible, Third Parties must seek for sustainable manufacture or production options.

### 3.4. Data Privacy

Third Parties must protect the privacy and security of personal and sensitive information in accordance with applicable laws and industry standards, such as GDPR, or other relevant privacy frameworks. This includes ensuring secure handling, storage, and transmission of data. Furthermore, the Third Party must prevent unauthorized access, disclosure, or misuse of information. Data breaches shall be promptly reported to relevant authorities and stakeholders in accordance with the applicable law and/or legislations.

#### 3.5. Animal Welfare

Animal testing should be performed only if legally required and after efforts have been made to reduce the numbers of animals used and to refine procedures to minimize distress. Where possible, alternatives should be used whenever scientifically valid and acceptable to regulators.

### 4. Compliance, failure, corrective actions and termination rights

CCH requires its Third Parties and any of its sub-contractors to comply with this Code. Third Parties are expected to be aware of, understand and build processes to comply with applicable laws and ethical business practices in jurisdictions where it operates or conducts business. We require Third Parties to take reasonable steps to ensure that this Code is communicated throughout their organizations and made available to their employees and sub-contractors. Upon reasonable notice, Third Parties are expected to demonstrate how they monitor, measure, audit and improve its level of compliance with this Code, both internally and externally with its own sub-contractors. Any Third Party is encouraged to report any concerns or (possible) violations of this Code to our Company through any identified reporting channels. Retaliation against those who report in good faith is strictly prohibited.

CCH has the right to use auditors and or other external sources to independently assess performance and verify responses given by Third Parties. CCH applies a risk-based approach for such an assessment,



for which Third Parties are considered where such factors as size, importance and activities may indicate the potential for a higher level of sustainability risks.

If a Third Party and/or any of its sub-contractors fail to comply with this Code, the Third Party must take corrective actions without delay. Further failure to comply with the requirements of this Code or in the absence of corrective actions by a Third Party or any its sub-contractors shall result in material breach of any agreement that it may have in place with CCH. CCH shall have the right to immediately terminate the agreement with the Third Party, and no damages shall be due by CCH in connection with such early termination.

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