

CODE OF BUSINESS ETHICS AND CONDUCT

HARPER HYGIENICS SA

Warsaw, January 2024



INTRODUCTION

HARPER HYGIENICS SA (hereinafter referred to as "Harper Hygienics") is a leading manufacturer of cosmetic and hygiene products for skin cleansing.

Harper Hygienics owes such a good market position to its close attention to consumer trends and meeting the ever-increasing needs of changing styles and leisure lifestyles.

Harper Hygienics employs over 500 employees, is expanding into foreign markets and plans further development, both in terms of scope and product portfolio. As a company cooperating with a lot of foreign companies, we respect the culture, commercial practices and ethical codes of foreign contractors. Only cooperation based on mutual respect enables sustainable corporate development.

Sustainable corporate development begins with the implementation of the company's value system and a code of ethics for conducting business activities based on established principles.

Business ethics in the economy is and always has been a necessity that cannot be questioned or negotiated with its constituted principles. Harper Hygienics is deeply convinced that honest and responsible behavior based on governing law and established commercial practices in a specific business sector should be an absolute rule for all enterprises.

Striving to effectively prevent unfair business practices and violations of the basic principle of win-win cooperation, Harper Hygienics hereby presents the Code of Business Ethics and Conduct regulating the principles of cooperation with employees, clients and contractors.

The Code of Business Ethics and Conduct is based on the principles introduced by the UN Global Compact covering the following zones:

A. Human rights

Rule 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Rule 2: Businesses should ensure that business practices are not complicit in human rights abuses.

B. Labor law

Rule 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Rule 4: Businesses should eliminate all forms of forced and compulsory labor.

Rule 5: Businesses should abolish child labor.

Rule 6: Businesses should eliminate discrimination in employment and occupation.

C. Environmental Protection

Rule 7: Businesses should adopt a precautionary approach to environmental challenges.

Rule 8: Businesses should conduct environmentally responsible activities.

Rule 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

D. Counteracting corruption

Rule 10: Businesses should fight corruption in all its forms including extortion and bribery.

RESPECT FOR HUMAN RIGHTS

Harper Hygienics supports and respects the protection of internationally recognized human rights and prevents human rights violations.

Harper Hygienics operates on the basis of and in accordance with the Charter of Fundamental Rights of the European Union, The Universal Declaration of Human Rights and the fundamental conventions of the International Labor Organization, ensuring the implementation of international human rights standards into its core business practices, and requires its contractors to adapt their policies and practices to governing law .

Harper Hygienics takes measures conducive to avoiding indirect violations of human rights, for which purpose it assesses risks in this regard by reviewing the ways and methods of performing services by its contractors, suppliers, employees and other state and non-state actors.

Harper Hygienics provides anyone whose rights have been violated with effective means of reporting violations and protection from retaliation, and participates in remedial proceedings based on the principle of open dialogue.

Harper Hygienics supports and promotes human rights through:

1. its core business activities supporting the UN's goals and objectives to respect human rights;
2. strategic social investment and charitable activities;
3. supporting and engaging in public policy respecting human rights;
4. promoting and explaining to its employees what human rights are and how they should be protected.

Harper Hygienics does not cooperate with entities that are reasonably feared to be contributing to a direct or indirect violation of the right to life, in particular does not cooperate with manufacturers or suppliers whose products and technologies are sold to the Nazi or similar regime and/or used to murder people.

Harper Hygienics does not tolerate violations of human rights by its employees, contractors and persons associated with the company, and analyzes the contractors' business policies regarding violations of absolute freedom from using or contributing to torture, cruel, inhuman and/or degrading treatment or punishment.

Harper Hygienics does not allow any form of discrimination by any cooperating entity and prohibits any direct or indirect distinctions, exclusions, limitations and restrictions based on race, gender, religion, ethnic, social or national origin, political or other opinions.

Harper Hygienics has a policy of ensuring equal treatment and the enjoyment of all rights by men and women. Every person has the right to take action to eliminate conditions that contribute to gender discrimination.

Employees, business partners, suppliers and other entities working with Harper Hygienics must not tolerate gender-based violence, sexual violence, domestic violence or violence against animals.

If the actions of Harper Hygienics or its cooperating entities contribute to the violation of human rights or have a negative impact on them, Harper Hygienics will take all corrective actions to repair or mitigate the effects of the violation, exercising reliability and due diligence towards the persons whose rights were violated.

LABOUR LAW

Harper Hygienics operates within the limits and in accordance with the applicable provisions of the Act of June 26, 1974, Labor Code, and complies with international employment standards, in particular those introduced by the International Labor Organization.

Harper Hygienics ensures that its employees respect their rights and freedoms and investigates whether the entities it cooperates with violate the rights and freedoms of their employees.

Harper Hygienics guarantees healthy and safe working conditions in accordance with occupational health and safety principles, ensures the application of fundamental values as part of working conditions: equality to promotion and the right to rest, free time and holidays, freedom of association and the right to collective bargaining and the right to strike.

Harper Hygienics creates a communication mechanism with employees that builds mutual trust and ensures confidential reporting of employee complaints. Harper Hygienics implements a safe environment that allows each employee and other related person who reports violations to be protected from retaliatory action and to ensure that follow-up action is taken to punish and prevent further violations. For this purpose, internal regulations for reporting violations of the law have been introduced.

In terms of the protection of personal data of employees, suppliers and business partners, Harper Hygienics complies with generally applicable provisions of Polish, EU and international law and reliably acts as a personal data administrator.

Harper Hygienics does not tolerate violations in the workplace by both its employees and contractors and takes all actions to eliminate all forms of forced and compulsory labor; exploitation of child labour, discrimination and mobbing.

Harper Hygienics eliminates the possibility of cooperation with entities, regardless of their size, industry or business potential, using employment methods consistent with slave labor, in particular:

- taking advantage of a dominant position by imposing working conditions that are inconsistent with international employment standards;
- misleading by providing working conditions that do not correspond to reality;
- restriction of the employee's freedom of movement or isolation;
- the use of physical or sexual violence;
- intimidation and threats;
- retention of identity documents;
- suspension of salary payments;
- being forced to work due to existing financial debts;
- grossly overtime work.

In order to create strengthened business relationships based on mutual respect enabling effective cooperation on a win-win basis, Harper Hygienics adapts to the ethical requirements of its contractors and requires their cooperation in observing ethical standards of cooperation. All business partners are required to comply with Harper Hygienics policy and develop an internal Code of Business Ethics.

ENVIRONMENTAL PROTECTION

Harper Hygienics cares about the environment, and to this end, it conducts its business activities in accordance with applicable environmental protection regulations.

Harper Hygienics, as a company that is a market leader in the production of personal hygiene products: cotton pads, cotton buds, make-up removal wipes and household wipes, ensures that the manufactured products meet the highest quality standards, following the principle of sustainable development and ensuring the least negative consequences for the environment.

All raw materials, packaging and machines used are constantly controlled by the Quality Assurance Department. Quality control also monitors semi-finished and finished products at every stage of production. Analyzes are carried out in accordance with European standards in a modern laboratory. Microbiological tests confirm that the products are safe for consumers and the environment.

All products are tested in external, independent and certified testing laboratories to ensure that customers meet their own individual requirements.

The ban on testing products on animals is strictly observed.

The implemented quality management system confirms that the highest standards of product quality and safety are met.

Given that there is an increasing need to control emissions of greenhouse gases and other substances causing environmental pollution, Harper Hygienics will strive to use energy from renewable sources

Harper Hygienics also undertakes activities in the field of ecological management of waste generated in the production process.

Harper Hygienics requires its business partners, including manufacturers and suppliers, to conduct business in response to environmental challenges. To this end, Harper Hygienics promotes taking actions aimed in particular at:

- a. development of land and marine resources and land use;
- c. preventing the depletion of the stratospheric ozone layer;
- d. preventing air pollution.

Harper Hygienics conducts periodic employee training in order to comply with its environmental policy, in particular in the following areas:

- a. using low-emission and energy-saving technologies;

- b. reducing atmospheric pollution and/or limiting anthropogenic greenhouse gas emissions;
- c. sustainable use of natural and environmental resources;

Harper Hygienics promotes support for the development and dissemination of environmentally friendly technologies as well as fulfills all formal obligations in terms of submitting reports or obtaining the necessary certificates/licenses/permits, including:

- permit for waste generation;
- permission to release gases or dust into the air;

In order to comply with and ensure its environmental obligations, Harper Hygienics is registered in the National Waste Records Database [BDO] where it keeps waste records using waste transfer cards and waste record cards. In addition, collective summaries of data on the types and quantities of waste, methods of waste management and installations and devices for waste recovery or disposal were submitted to the Masovian Voivodeship Marshal's Office.

Harper Hygienics, through cooperation with a recovery organization and participation in fees for single-use products, contributes to the ecological education of society.

Harper Hygienics also requires its contractors, suppliers and employees to comply with legal regulations regarding environmental protection. For this purpose, before establishing cooperation or during it, it was checked whether potential contractors conduct their business legally and in accordance with the law by registering in the BDO database. Registration in the BDO database is a necessary condition for establishing cooperation with Harper Hygienics.

ANTI-CORRUPTION POLICY

Harper Hygienics prohibits corruption in all its forms, including extortion and bribery.

In order to build relationships with contractors, clients, suppliers and employees based on mutual respect and trust, Harper Hygienics expands the anti-corruption system in the field of honesty and ethics.

Harper Hygienics does not allow the use of methods involving the submission of so-called financial "deposits" during the recruitment process in order to secure a job in the company. Moreover, Harper Hygienics does not tolerate any manifestations of corruption on the part of employment agencies through which Harper Hygienics establishes cooperation with employees.

During the recruitment process, the candidate is selected regardless of his/her knowledge or relationship with an employee of the company regardless of the position level, or with a contractor or other entity related to Harper Hygienics.

Harper Hygienics does not tolerate unethical behavior of employees, lack of employee loyalty to the company, or the overall ethical culture of the company. To this end, Harper Hygienics takes appropriate actions towards its employees to inform them about their duties and responsibilities.

The company is allowed to organize team-building events and celebrate employees' birthdays. However, it is unacceptable to give gifts whose value is grossly excessive. Such behavior may be considered a manifestation of corruption undertaken for the purpose of bribery.

Moreover, it is strictly prohibited to grant, promise to grant, accept a material benefit or incite the gratification of such a benefit in order to achieve a specific business advantage or in gratitude for achieving a business advantage to employees, contractors, suppliers or other related entities, as well as to third parties or public officials in connection with their performance of this function.

In order to counteract corruption, each person cooperating with Harper Hygienics is obliged to:

- a. preventing, detecting and reporting cases of bribery,
- b. act honestly without any intentions or activities related to corruption and to comply with the following principles,
- c. compliance with the principles of honesty and ethics towards cooperating persons and the company,
- d. cooperation with the company in eliminating corrupt behavior,
- e. avoiding conflicts of interest that could lead to the risk of corruption.

All entities cooperating with Harper Hygienics should comply with the anti-corruption policy out of loyalty to the company and taking into account possible risks resulting from corrupt activities, in particular:

1. criminal liability in accordance with Art. 228 of the Penal Code [Vendability], art. 229 of the Penal Code [Bribery] and Art. 286 Penal Code [Fraud];
2. risk of loss of business reputation;
3. risk of incurring high costs.

SUMMARY

This Code of Business Ethics and Conduct defines Harper Hygienics' internal policy regarding respect for human rights, compliance with labor law, environmental policy and anti-corruption policy.

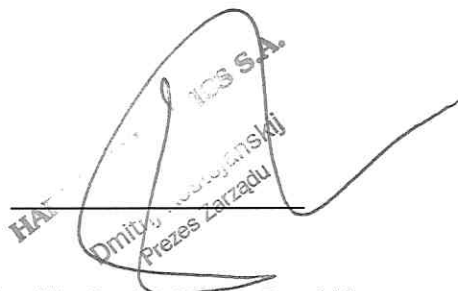
Each cooperating entity that becomes aware of a violation of the principles set out in this Code or the provisions of Polish or international law in this regard is obliged to report the violation to the Chairman or Members of the Management Board.

Each reporting entity is protected by Harper Hygienics against retaliation.

This Code is published and posted on the Harper Hygienics website <https://www.harperhygienics.com> and printed in every workplace.

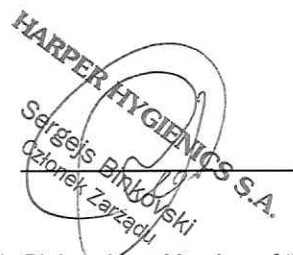
This Code should be understood and interpreted as a coherent whole, constituting a list of ethical principles on the basis of which Harper Hygienics conducts its business policy. The Code is made available for review by employees, contractors, customers, suppliers and other related persons no later than on the date of commencement of employment or other contractual relationship.

On behalf of Harper Hygienics S.A.:



HARPER HYGIENICS S.A.
Dmitrij Kostojanskij
Prezes Zarządu

Dmitrij Kostojanskij – President of the Board Management



HARPER HYGIENICS S.A.
Sergejs Binkovskis
Członek Zarządu

Sergejs Binkovskis – Member of the Board

