Kneipp

CODE OF CONDUCT

THE COMPLIANCE COLORS OF KNEIPP

3rd Edition

OUR BRAND PHILOSOPHY

KNEIPP TRANS-FORMS YOUR LIF FOR THE BETTER

BY CREATING JOYFUL MOMENTS THAT LAST.

Kneipp Code of Conduct

Compliance Colors of Kneipp

The company Kneipp, a 100% subsidiary of Paul Hartmann AG, comprises many very different and unique individuals, all of whom continuously strive to act according to the principle "Kneipp works, naturally" and to sustainably shape the company. Kneipp GmbH is committed to represent Sebastian Kneipp's ideals as a company and to continue his life's work. The bond between health and nature, just like the five pillars of Kneipp's teachings – Water, Plants, Exercise, Nutrition and Internal Balance – continue to be reflected in every Kneipp product today, more than 125 years after they were developed.

Good collaboration between colleagues and a culture of open doors also within the corporate group form the foundation of our daily work and our success.

As employees and representatives of Kneipp, we believe it is important to build and maintain long-term business relations with customers, suppliers, independent contract partners and other service providers.

Within the scope of our business operations, we regularly and continuously strive to ensure compliance with all relevant international, national and local legislation, as well as with laws that prohibit bribery and corruption.

Beyond this, we are committed to important values and ethical behavior, which are described in this Code of Conduct. At Kneipp, we base our actions on these principles; each of our business partners can and should judge us according to these values. At the same time, we expect our business partners to act according to these principles and values.

While there cannot be different interpretations when it comes to compliance with legal provisions, human rights, discrimination and animal testing, we are well aware that environmental protection, for instance, can be interpreted in different ways depending on the location and values of the respective companies. At Kneipp, however, protecting the environment is a core concern, which is why we believe it is important that our business partners incorporate environmental protection into their actions.

If you have any questions about compliance – even if they may seem trivial – you should seek advice and help. Employees are encouraged to contact their supervisors or their local Compliance Officer; business partners can reach out to their business contacts or the executive management. You will also find additional contact persons in our Code of Conduct.

At Kneipp, our daily actions should always be guided by the provisions laid down in the Code of Conduct. We trust that you and all of us will act accordingly – to stick to our vision and values.

August 2021

Alexander C. Schmidt Managing Director Kneipp Group

Frank Titus Managing Director Kneipp Group

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01 | SOCIAL RESPONSIBILITY & CUSTOMER SATISFACTION

As a manufacturer and supplier of medicinal and cosmetic products, related solutions and services, we contribute towards improving the wellbeing and satisfaction of our customers. We see it as our duty to offer safe and high-quality products.

We are committed to full transparency, integrity and ethical conduct in our relations with customers, suppliers and authorities. Our actions are guided by the local, national and international laws in the countries in which the Kneipp Group operates. These include, among others, the following regulations:

- UN Universal Declaration of Human Rights
- International Labour Organization (ILO) Declaration on Fundamenta Principles and Rights at Work
- ILO Fundamental Conventions (Core Labor Standards)
- UN Convention on the Rights of the Child

Following the principles above, we apply the guidance from the UN Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

We believe in our products and services and are proud of the way we conduct our business with all our partners. Our commitment to the common good is reflected in how we act as socially and ethically responsible individuals. We support charitable initiatives and programs as well as organizations that promote environmental protection and other non-profit objectives, thus increasing the social stability.

LAVENDER STANDS FOR RESPECTFUL **GRAY-GREEN STANDS FOR**

RESPONSIBLE

02 | SUSTAINABILITY & ENVIRONMENTAL PROTECTION

We base our actions not on short-term optimization opportunities, but rather strive to achieve sustainable and permanent growth, along with a profitable development of our enterprise in harmony with nature and the environment. Our core objective is to secure our location and our jobs. We consider ourselves an important part of society and assume social responsibility. We use the assets of the company in a responsible manner. Our efforts for sustainability, which allow Kneipp to achieve the greatest positive effects on nature and the environment, focus on the conservation of resources and climate compatibility of our actions, on the design and composition of our packaging, and on the ingredients contained in our products. We continuously strive to reconcile the needs and challenges of current and future generations.

A conscientious approach to dealing with and using the scarce natural resources is just as much the order of the day as ensuring that our commercial actions are climate-friendly; this is something all enterprises should be committed to. In this regard, we do not allow ourselves to become distracted by short-term sentiments, but instead always consider the relevant effects in their entirety. When sourcing and delivering our products, we aim to optimize our capacity utilization and transport routes. For our packaging, we use materials with a high degree of recyclability. In doing so, we can of course achieve the strongest impact by doing without unnecessary materials and packaging, without however compromising on quality or regulatory requirements.

In keeping with the motto "best of nature - best of science", we take the greatest care when choosing the ingredients for our products. For the natural ingredients, our focus lies on sustainable management and on the harvest; for all other ingredients, we rely on insights from scientific studies and applications and take the environmental compatibility of these ingredients into account. **Kneipp** Code of Conduct | Relationship with our Employees

RED STANDS FOR

03 | RELATIONSHIP WITH OUR EMPLOYEES

Kneipp is a global enterprise with local roots. Our actions are guided by respect and appreciation towards all humans – irrespective of gender, age, religion, skin color or background, social status or sexual identity and orientation. We will not tolerate any behavior or remarks that are inhuman, discriminating, or offensive to human dignity. We respect our employees' rights, the individuality and the diversity of our employees. We promote diversity in the workplace and provide a safe and attractive work environment. For us, equal opportunities are just as much a matter of course as appropriate and competitive salaries.

We are tolerant, fair and honest. Our actions are characterized by modesty and integrity. We respect and follow the applicable labor legislation in the respective legal systems in which Kneipp is represented. The work, ingenuity, commitment and entrepreneurial spirit of the people who work for Kneipp are our greatest assets.

Our employees are the driving force behind our high-quality products; they lay the foundation for ensuring customer satisfaction and for implementing our corporate vision. A good work environment provides the basis for successful and productive working. Our corporate culture is reflected in the way we, as colleagues and fellow employees, interact with one another. We promote not only good collaboration among our employees, but also the health as well as the skills and expertise of each and every one of them. Only in this way can we achieve the best possible performance for the benefit of all our stakeholders.

04 | PRODUCT LEGISLATION AND OTHER REGULATIONS

As a manufacturer of medical devices and cosmetic products, we are subject to many national and international rules and regulations designed to protect consumers and other users.

We strive to continuously improve the quality of our products and services. Our products are designed and manufactured to comply with our quality management system and to meet the entry requirements of the markets we serve.

To ensure that our products meet the specified safety standards and the regulatory requirements we have established a separate unit within the company which verifies compliance with all legal provisions and promptly takes action should adverse events occur.

Using animal testing in the development and investigation of our products is, of course, not an option for us. While this has meanwhile been prohibited by law in many countries, we are more than happy to abstain from selling our products in countries in which animal testing is required by law.

GRAY STANDS FOR COMPLIANT

05 | ANTI-CORRUPTION LAWS AND ETHICAL STANDARDS

We conduct our business in compliance with all applicable laws and ethical standards.

We require strict compliance with all legal requirements and prohibit corruption and unlawful payments of any kind. Any and all behavior that could be interpreted as corruption, including, for example, bribery, fraud, misuse of funds or payments to public administrations, will not be tolerated.

The majority of countries in which we operate have laws that prohibit payments or non-cash benefits to be made, offered or promised (directly or indirectly) to government officials or company representatives when the payment or non-cash benefit is intended to influence an official act or decision. We are subject to the anti-bribery and anti-corruption provisions of numerous legal provisions, such as the German Criminal Code, UK Bribery Act and other laws and regulations, which might apply domestically and abroad.

PALE YELLOW STANDS FOR ETHCAL

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HONORABLE

06 | FAIR COMPETITION

We believe in free competition an we respect that the proper functioning of the economy is based on fair and loyal exchange within the framework of open competition. We must ensure that we fully comply with the applicable competition laws. These laws are complex and difficult to be summarised in this context. At their very essence they prohibit agreements with competitors on prices, terms and conditions of business or other factors affecting competition.

We must be aware of these laws and their implications, including how they apply in the country in which we operate.

We prohibit:

- discussions or contacts with competitors about pricing, costs, or terms or conditions of sale,
- discussions or contacts with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace,
- agreements with competitors regarding allocating markets or customers,
- agreements with others to boycott customers or suppliers.

Anti-competitive practices may lead to fines, civil liability for damages, exclusion from public contracts or criminal liabilty. These measures may significantly damage the company.

We are committed to marketing and distributing our products and services in accordance with these legal restrictions.

Kneipp Code of Conduct | Political Activities

07 | POLITICAL ACTIVITIES

Political decisions affect Kneipp and its business activities in many different ways. As a responsible member of society, we consider it our duty and our right to participate in the political process and to voice our positions and views. We do this, among other things, by becoming actively involved in industry trade associations.

We also encourage our colleagues to participate in the political process. Private political activities, however, must remain strictly private and must not be pursued on behalf of our company. Conducting personal political activities on company time or using company property or equipment for this purpose is not permitted.

BLUE STANDS FOR

Kneipp Code of Conduct | Conflict of Interest

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08 | CONFLICT OF INTEREST

A conflict of interest arises where personal, social, financial or political interests affect the interests of our company. Even the appearance of a conflict can damage the reputation of our company. However, many potential conflicts of interest can be resolved in a simple and mutually acceptable way.

Therefore, any potential conflict of interest must be disclosed and approved. Conflicts of interest may, for example, arise if an employee or a close person:

- has a substantial financial interest in a Kneipp supplier, competitor or customer,
- has an interest in a transaction in which it is known that Kneipp is, or may be, interested,
- takes advantage of the corporate opportunities at Kneipp for personal profit,
- receives fees, commissions, services or other compensation from a Kneipp supplier, competitor or customer.

Kneipp Code of Conduct | Intellectual Property

PALE BLUE STANDS FOR

PROTECTIV

09 | INTELLECTUAL PROPERTY

We operate in an environment that is driven by the development of intellectual property and handling of confidential information. Protecting our know-how is crucial in achieving and strengthening the company's competitive advantage.

Our company safeguards its intellectual property through brands, patents and other commercial property rights. We take all the necessary precautions to prevent an unwanted disclosure or loss of confidential information.

We expect every employee to support the establishment, protection, maintenance and defense of the intellectual property rights of Kneipp in a responsible manner.

We protect the intellectual property of Kneipp with the same diligence and attention with which we respect the rights of third parties. Any unauthorized use or misappropriation of third-party intellectual property may result in high penalties, lawsuits or criminal penalties for the company.

ORANGE STANDS FOR TRUSTWORTHY

10 | PRIVACY AND DATA PROTECTION

Data protection is intended to provide adequate protection for personal data (e.g. personal number, name or IP address). Careless handling of personal data can violate the rights of the data subject and result in damages to a company's reputation and sanctions of various kinds. Therefore, each employee must ensure that the processing of personal data is always carried out on a legal basis.

Networking of business processes requires the handling of large amounts of data. In the context of our business activities, customers also entrust us with sensitive data, e.g. health data. The trust of our customers, employees and others is essential for our success and the achievement of our strategic goals, for which reason we extensively protect all data in our business processes.

Each employee should act in accordance with the following principles with regard to data protection:

- Data subjects shall be informed in an appropriate and transparent manner about the processing of their data.
- Personal data is only collected to the extent necessary to achieve the business purpose. Personal data must also be correct and up to date.
- Personal data will be processed for specific purposes in accordance with the applicable data protection laws.
- Sufficient technical and organisational security measures must be taker to prevent unauthorised use, loss or damage.
- Information shall only be kept as long as it is relevant for the purpose of the processing and permitted by law. In cases of doubt, please contact Group Data Protection.

11 | INFORMATION SECURITY

Kneipp has established an information safety management system and has taken appropriate technical and organizational precautions – based on international standards – to ensure the confidentiality, integrity and availability of information and data within the Kneipp Group at all times. In this regard, we also work in close collaboration with our parent company, Paul Hartmann AG.

We handle all information and data in accordance with their information classification, thus ensuring that information, data and documents that are classified as confidential and strictly confidential are effectively protected against unauthorized access at all times.

The information security principles at Kneipp are laid down in the current Information Security Policy and in the related Information Security Guidelines.

WHITE STANDS FOR LAWFUL

12 | TRADE AND TAX LAW

As an international manufacturer and supplier of cosmetic products, compliance with all applicable trade and tax laws and trade programs worldwide is a matter of course for us. Violations of these provisions may be severely punishable; they can lead to fines as well as import and export restrictions, result in penal sanctions, and cause serious damage to Kneipp's reputation. We act in compliance with the relevant trade and tax laws of all countries in which we operate.

We expect our customers and suppliers to uphold the same ethical standards that we expect from ourselves and from our employees.

BERRY STANDS FOR

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13 | RELATIONSHIP WITH BUSINESS PARTNERS

We pursue a collaborative and partnership-based cooperation with our business partners. We always treat our business partners as equals – regardless of their origin, size and share in our commercial success. We also expect our business partners to treat us in the same way.

While we choose our business partners based on transparent and specified criteria, including, for example, price, quality, delivery service and reputation, we also attach great importance to ethical conduct among our business partners. We will not accept any violations of our ethical principles and the policies set out in this Code of Conduct, even by our business partners.

Other criteria that are not in some way related to the provision of the respective products or services are not taken into account.

Payments must never be made to persons other than the contracting party or the contractually stipulated representative.

PURPLE STANDS FOR

ACCESSIBLE

14 | VOICING CONCERNS

If we want to achieve our standards of ethical conduct in the long run, we must incorporate the rules of conduct in our day-to-day business.

Therefore, make the Code of Conduct an integrated part of all decisions which are your responsibility. Use your good judgment and common sense on issues you may encounter. In order to fully understand your legal and ethical responsibility, you should voice any concerns in connection with your work. If you are unsure whether you are acting in the right way, you should ask your supervisor or your Compliance Officer for advice.

Furthermore, if you believe that someone may be doing something that may violate these basic principles, or the law, you should advise the appropriate person. To not raise your concerns, could lead to you being held liable for another's unlawful actions. Only if you make the issues known to the company, we have the opportunity to prevent harm to employees, the company and those who depend on us.

Kneipp will make sure you get the necessary assistance if you raise an issue. We will give you the opportunity to report your observations without having to fear repercussions. In this context, we will of course handle all information confidentially.

IMPORTANT QUESTIONS

If you are unsure, you should ask yourself the following questions:

- Would I feel comfortable if information about my actions were investigated by the law enforcement authorities, competition authorities or other third parties?
- Would I feel comfortable if I saw the consequences of my actions on TV, online or read about them in a newspaper?
- Would I feel comfortable if I had to explain my actions to a supervisor?

If your answer to any of these questions is "no", you should not engage in any detrimental activities.

CONTACT PERSONS

This Code of Conduct is binding for all employees of the Kneipp Group and was prepared on the basis of the Code of Conduct of the Hartmann Group. If you become aware of or suspect a violation of this Code of Conduct, applicable laws or regulations, or if you are worried about there being a conflict of interest, you should voice your concerns to your supervisor without delay.

While all reports will be handled confidentially, we may be obliged to make further inquiries. In doing so, we will comply with the legal provisions and, where necessary, collaborate with the law enforcement agencies. Any employees who, in good faith, seek advice or report potential misconduct are acting in compliance with the rules of this Code of Conduct and, therefore, Kneipp and Hartmann will not tolerate any discrimination of these persons. You may ask questions or raise concerns by email, in writing or by telephone to the following persons:

- Your supervisor
- Your local Compliance Officer E-mail: compliance@kneipp.de
- The Chief Compliance Officer, Compliance hotline: Sebastian Grünewald
 Paul Hartmann AG
 Paul-Hartmann-Straße 12
 D-89522 Heidenheim, Germany
 Phone: +49 (0) 7321 36 16 80
 Mobile: +49 (0) 162 245 27 69
 E-mail: reporting@hartmann.info
- The ombudsperson in Germany, hotline: Legal attorney Dr. Markus H. Ostrop Rösslinweg 4
 D-70184 Stuttgart Germany
 Phone: +49 (0) 711 248 48 48
 Fax: +49 (0) 322 241 95 91 2
 Mobile phone: +49 (0) 173 986 74 51
 E-mail: dr.ostrop@kanzlei-ostrop.de
- or the ombudsperson of the respective country (if appointed).

(Kneipp is a member of the HARTMANN Group), Code of Conduct, version 3.0., effective date: 01 August 2021

Kneipp GmbH Winterhäuser Str. 85 97084 Würzburg Germany www.kneipp.com