

**Beiersdorf**

**DECLARATION OF  
PRINCIPLES ON  
UPHOLDING HUMAN  
RIGHTS**



# Our Commitment to Safeguarding Human Rights

As a globally active company with over 170 affiliates and more than 21,000 employees, Beiersdorf bears a major responsibility to everyone in the company and to society itself. We are keenly aware of our responsibility and are actively committed to upholding laws, international standards, and human rights throughout our entire value chain. We require and promote full compliance through our employees and our business partners; we do not tolerate any form of forced labor, child labor, discrimination, nor any other type of human rights violation.



With this Declaration of Principles, we explicitly commit ourselves to strengthening human rights along our entire value chain, and to preventing violations of these rights. The Declaration is reviewed at least once a year, as well as on ad hoc basis, by our Corporate Sustainability Department and continually further developed to take account of relevant changes. The Declaration is globally valid for the Consumer Business Segment as well as our business partners in the supply chain. Beiersdorf's Vice President of Corporate Sustainability is responsible for the content of this Declaration of Principles as well as the processes to safeguard human rights.

## Standards, Guidelines, and Organizations



In particular the following international standards and guidelines underpin our action as a company and our collaboration with business partners:

- The Universal Declaration of Human Rights ([UN](#))
- The Conventions of the International Labour Organization ([ILO](#))
- The "Guidelines for Multinational Enterprises" of the Organization for Economic Cooperation and Development ([OECD](#))
- The Ten Principles of the UN Global Compact ([UNGC](#))

Beiersdorf supports the UN Agenda 2030 for sustainable development. Through our membership of the UN Global Compact, we are strengthening our commitment to upholding human rights, both within our own company as well as in our business partners' organizations.

Besides this, we are fully committed to upholding country-specific laws and governmental requirements, such as:

- [The Supply Chain Due Diligence Act in Germany](#)
- [The California Transparency in Supply Chains Act in the USA](#)
- [The Modern Slavery Act in Great Britain](#)

## Group-wide Risk Management

The Beiersdorf Group is exposed to a number of risks as part of its business operations. We have implemented an integrated risk and opportunity management system so that we can recognize risks to our operations at an early stage as well as document them. This system considers non-financial risks in addition to financial risks. These also include risks that are associated with upholding human rights. The system is an integral part of the processes in the individual companies, the management units and regions, and it is updated annually. Within the framework of risk management, periodic inventories are used to identify, assess, document and subsequently communicate the significant risks along with the measures taken to control risks.



The Executive and Supervisory Boards are regularly informed about the risk situation on a Group level. Additionally, direct information hierarchies ensure that suddenly occurring significant risks are reported immediately to company management. Risk management is monitored by internal control mechanisms as well as external auditors.

## Analysis and Prioritization of Risks related to Human Rights



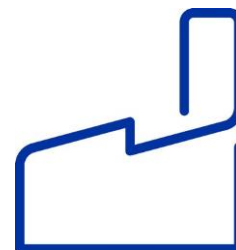
Risks related to upholding human rights - both in our own areas of operation as well as in the up- and downstream supply chains - are included in above mentioned system. These risks are identified by means of a risk analysis and form the basis of our measures for fulfilling our due diligence with regard to human rights. Internal and external sources are evaluated on a continuous basis by the Sustainability and Procurement functions to ensure that the risks we have identified, prioritized and weighted are complete in terms of quantity and quality. Past alerts or complaints received are considered in the risk analysis to ensure that perspectives of affected stakeholders are integrated.

The procurement of individual groups of goods in our portfolio is associated with sector-specific risks such as deforestation, loss of biodiversity through planting of monocultures, and uncertain working conditions, in particular for groups in need of protection. We devote special attention to these risks. Our group of major risk-exposed commodities include materials based on palm oil, soybean oil, coconut oil, paper, and selected minerals. We develop responsible procurement strategies for these risk-exposed commodities to promote environmental protection as well as to improve the livelihoods of the local populations and the workers along the supply chain.

In addition to these focus materials, we have identified and given top priority to these fundamental and material social risks as part of our risk analysis: violations of safety standards or lack of precautionary safety trainings, insufficient protection against workplace violence, discrimination and harassment, violations of working time or wage regulations. Furthermore, for workers in raw material extraction or labor-intensive services in upstream supply chains, we also recognize the risk of forced labor or child labor being present. To minimize the identified risks, we have anchored multilayered measures in our own areas of operation as well as in the supply chain.

## Measures in our own Operations

The Code of Conduct ([CoC](#)) for Employees is a binding guideline for all Beiersdorf employees and managers worldwide. It is oriented towards our [Core Values](#): Care, Simplicity, Courage, and Trust. It commits all employees to implement our Values in their daily work and interactions with business partners. All our employees receive targeted training on the CoC and further relevant topic areas when they start work at Beiersdorf, and at regular intervals thereafter. Our Group-wide Compliance Management organization regularly checks compliance with the CoC, which we updated in 2023. To ensure high standards in the areas of corporate ethics, working conditions, environment, and health and safety in the workplace that go beyond this, all production centers around the world are audited according to the SMETA 4 Pillar principle and identified potentials for improvement are implemented. In addition, our employees have a range of complaint mechanisms at their disposal that are explained in the "Awareness and complaint mechanisms" section below.




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## Measures in our Supply Chains



In addition to aforementioned focus programs for our major risk commodities, we have implemented a Business Partner Code of Conduct ([Business Partner CoC](#)), which stipulates binding criteria for responsible action in accordance with ethical and legal standards for our business partners and which was updated in 2023. Our aim is to ensure that our business partners and their subcontractors fulfill the same requirements that are binding for us. The Business Partner CoC references four critical areas of influence:

- Corporate integrity
- Human rights and labor standards
- Health and safety in the workplace
- Environmental protection

We expect all our suppliers to comply with the criteria stipulated in our Business Partner Code of Conduct. Written declaration of compliance is mandatory for suppliers of the Beiersdorf network with an annual business volume exceeding € 50,000. The CoC furthermore contains the requirement to cascade content and principles within their supply chains. We monitor implementation as part of our [Responsible Sourcing program](#). To this end, we continuously assign direct suppliers a risk profile. Risk profiling is carried out by an external service provider in consideration of multiple data sources regarding country- and industry-specific risk factors as well as learnings from our internal complaint channels and past audits. If necessary, detailed analyses are carried out based on the risks identified. Among others, the resulting measures include assessment on international sustainability platforms such as [EcoVadis](#) or [Sedex](#), as well as social audits in accordance with the SMETA-4-Pillar principle. If applicable, a time-bound corrective action plan is agreed afterwards. The results are documented using an internal database. Additionally, we take part in collaboration platforms such as [AIM PROGRESS](#) to drive industry-wide change together with other companies from the consumer goods sector. Further policies in the [Download Center](#) on our corporate website describe additional principles and requirements that go beyond our direct business partners.

# Corporate Social Responsibility beyond the Supply Chain

In addition, we champion a more inclusive society. Accordingly, we focus our engagement beyond the supply chain particularly on people affected by social inequality, exclusion and isolation. We support locally relevant initiatives that aim to strengthen individual health, enable better social connections and foster more equitable societies.

Our commitment takes place both at the corporate level and at the level of our individual brands. Globally, the focus of our corporate commitment is on [empowering women and girls](#) as well as humanitarian aid. The commitment of individual brands also provides targeted support in areas that match the respective brand identity and brand expertise and is geared to the social needs and concerns of local communities.




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## Awareness and Complaint Mechanisms



To systematically avoid or combat violations of our Codes of Conduct, we have established several channels through which our employees, customers, business partners, and employees in the supply chain – as well as all other stakeholders – can report irregular behavior or express their concerns. Reporting of complaints is confidential and discreet.

Our employees can contact our Compliance department personally or use the compliance hotline to report a violation. Additionally, we offer a web-based whistleblower system called [“Speak up. We care.”](#) This web-based platform offers our employees, employees along the supply chain, customers, consumers, and other stakeholders a protected, secure, and – if legally permissible in the relevant country – anonymous means of reporting violations. The whistleblower system is available in more than 30 languages and can be used in all countries where Beiersdorf is represented by its subsidiaries. The system documents cases along with the remediation activities that follow. You can find a more detailed description of the reporting process [here](#). Whistleblowers from other countries can send an email to [incidents\\_cases@Beiersdorf.com](mailto:incidents_cases@Beiersdorf.com) to get in touch with the Corporate Compliance Management team.

We provide regular training on our Code of Conduct to all employees, in particular on proper behavior in the workplace, on ethical decision-making, and on compliance with laws and regulations. Additionally, our Procurement department undergoes regular obligatory training specifically on the Beiersdorf Business Partner CoC as well as the risk prevention measures resulting from the risk classification of our business partners.

## Continuous Development

Our risk analysis, the effectiveness of our existing measures, and this Declaration of Principles are regularly reviewed and adapted to account for current changes and learning effects. This review takes place as part of regular meetings of a control board with representatives from the departments Legal, Compliance, Procurement, and Sustainability.

Additionally, we report annually on our approach and our progress, as well as the commitments we have made regarding human rights, in [our annual reports](#) and in the Sustainability section of our [website](#).

This Policy Statement on upholding Human Rights was last revised in December 2024.



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December 2024

A handwritten signature in blue ink, appearing to read 'JF Pascal', written over a horizontal line.

JEAN-FRANÇOIS  
PASCAL

Vice President  
Sustainability