Owner:	Arielle Semin, Global Head ESG
Approved by:	Frank Smalla, Chief Operating Officer
Effective date:	February 15, 2026
Review date:	

PURPOSE:

This Policy:

1. Facilitates compliance with applicable human rights laws and regulations where Wella Company operates.
2. Establishes our commitment to human rights, fair labor practices, environmental responsibility, and ethical sourcing across all global operations.
3. Informs everyone working for Wella Company of their legal responsibilities.
4. Supports WECare - Wella Company's Code of Conduct.

APPLICATION:

This Policy applies to all activities, transactions, operations and personnel working for Wella Company[1] worldwide regardless of location, role or level of seniority. This includes all Wella Company businesses, including subsidiaries and joint ventures, as well as Wella Company employees, directors and officers, and third parties acting on behalf of Wella Company.

For the avoidance of doubt, this includes ghd, Briogeo as well as all brands and subsidiary brands.

COMPLIANCE WITH INTERNATIONAL & REGIONAL STANDARDS

We recognize our responsibility to respect human rights as outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs) and align with international standards such as the

- Universal Declaration of Human Rights (UDHR),
- International Labor Organization (ILO) Conventions,
- OECD Guidelines for Multinational Enterprises.

We comply with all applicable human rights laws and international standards where we operate.

This Policy represents the minimum standard globally, unless expressly stated otherwise. In the event of any conflict between this Policy and national laws, the national laws will prevail.

POLICY STATEMENT:

This policy outlines Wella Company's commitment to respecting human rights and managing related risks across our operations and supply chain. We aim to create a responsible supply chain that promotes dignity, equality, and sustainability.

1. **Fair Labor Practices**

[1] Rainbow UK BidCo Ltd and all its subsidiaries

We prohibit child and forced labour, ensure fair wages, and maintain safe working conditions in compliance with local regulations. We seek to ensure that all employees, suppliers, and partners uphold the following standards:

a. No Child or Forced Labor: Strictly prohibited in any form.
b. Fair Wages & Working Conditions: Compensation must meet or exceed local minimum wage laws.
c. Safe & Healthy Work Environment: Compliance with local health and safety regulations.
d. Non-Discrimination & Equal Opportunity: Employment decisions are based on merit, without discrimination based on gender, ethnicity, disability, or religion.

2. Ethical Sourcing & Environmental Responsibility

Human rights and environmental sustainability are closely linked. We source materials responsibly and aim to minimize environmental and social impacts on the communities across our supply chain by:

a. Sourcing ethically **certified and traceable** raw materials whenever possible, such as RSPO palm oil.
b. Following **due diligence** on high-risk locations and industries and on high-risk materials like mica and conflict minerals and aiming to eliminate when possible
c. Managing responsibly the sourcing of materials that could contribute to **deforestation, habitat destruction, biodiversity loss** and that respects indigenous land rights and water.

3. Implementation and due diligence

We aim to implement this policy through:

a. Due diligence: Assessments of high-risk supply chain areas.
b. External Partners Code of Conduct: Mandatory agreement by all vendors.
c. Audits: Independent reviews of supplier compliance with human rights and labor standards.
d. Grievance Mechanism: Confidential reporting system for potential labor violations via our Hotline Link to access
e. Continuous Improvement: Training and policy updates based on evolving human rights standards.

4. Transparency and Continuous Improvement

Wella Company is committed to transparency on human rights and labor standards through annual reports and aims to

a. **Report on the annual progress** of our human right's due diligence.
b. Continuously review and **improve our practices** to align with evolving standards and stakeholder expectations

5. Roles and responsibilities

Implementation of this policy is overseen by the ESG/Sustainability team, with accountability at various levels of the organization

6. Enforcement & Consequences

Violations of this policy may result in contract termination, legal action and/or removal of external business partners from our approved supplier base.

ADMINISTRATION:

This Policy is reviewed regularly and may be amended at any time. Each version supersedes prior versions and is implemented globally in compliance with local laws, including mandatory consultation with social partners where required.

FURTHER HELP:

For any questions or assistance, contact the Corporate ESG Function at environmentalsocialimpact@wella.com

RELATED POLICIES AND GUIDANCE:

- Code of Conduct
- External Business Partners' Code of Conduct
- Environmental Policy
- Responsible Sourcing Strategy