

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025

INTRODUCTION

At Beiersdorf UK Ltd. ("Beiersdorf UK") we want to play an active role in making positive contributions to our society. Beiersdorf UK acknowledges that, as being part of a global corporate organisation, it has a responsibility to address and seek to eliminate the risk of slavery and human trafficking in its operations. This reflects the company's commitment to human rights, in accordance with the principles outlined in the United Nations Universal Declaration of Human Rights and the UK Modern Slavery Act 2015.

In this statement, we set out Beiersdorf UK's commitment to taking steps to identify and eradicate slavery and human trafficking from its business and from its supply chains. We do not tolerate slavery and human trafficking within the supply chain or within any part of our business.

As required by the UK Modern Slavery Act 2015, this statement reports on the steps Beiersdorf UK and the Beiersdorf group have taken in this regard during the financial year ended 31 December 2025.

STRUCTURE AND SUPPLY CHAINS

Beiersdorf UK, based in Birmingham, is a part of the Beiersdorf group, a global leader in the consumer goods industry. Beiersdorf UK's principal activity is sales, marketing and distribution of products for the care and protection of skin marketed under major brands such as NIVEA, Eucerin and Elastoplast. An overview of where Beiersdorf UK fits within the global business, as well as details of the company's [core values](#) and [product brands](#) appears in the online [company profile](#). Information about the parent company Beiersdorf AG can be found on its [homepage](#).

Beiersdorf UK is integrated into a supply chain whose processes take place predominantly within Europe. Only a handful of suppliers who directly supply Beiersdorf UK are located outside of Europe. More precisely, in 2025, Beiersdorf UK sourced 88% of the volumes of finished goods from Beiersdorf owned factories and 12% from third-party manufacturers or third-party co-packers. 52% of these volumes were sourced from Germany, 22% from Spain, 17% from Poland, 3% from Italy, 3% from The Netherlands and the remaining 3% from the rest of the world.

Regarding goods and services not directly related to the production of products, 80% of spend was with suppliers located in the UK, 18% with those based in Europe and 2% with suppliers outside of Europe. 73% of spend (36% of suppliers) were covered by the Corporate Procurement (Global and Regional) function and 27% of spend (64% of suppliers) by the Local organisation.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Policy for Employees

All Beiersdorf UK employees (250+) are provided with a [Code of Conduct for Employees](#). The latest version of this Code of Conduct was officially introduced by the Board of Directors to all employees and managers in 2023. In addition, everyone is trained on this policy through e-learning.

The Code of Conduct is designed to help employees to understand the company's principles and to act in accordance with them. Diversity and equal opportunities are an essential part of the Code of Conduct. The Code of Conduct also clearly states that Beiersdorf does not support or tolerate slave labour, child labour or human trafficking. Beiersdorf also stands for fair working conditions and promotes physical and mental health and safety at work.

Beiersdorf as a global company has an established [Declaration of Principles on Upholding Human Rights](#), which sets out our commitment to protecting the rights of all individuals across the value chain. This declaration applies to all our affiliates, including Beiersdorf UK, and covers both our employees and business partners. It serves as a framework of all the steps Beiersdorf takes in preventing human rights violations and is regularly reviewed by Beiersdorf's Corporate Sustainability Department to ensure it remains aligned with international standards. Beiersdorf's Vice President of Corporate Sustainability has ownership for the content within the declaration as well as our processes to safeguard human rights.

Policy for Suppliers

Beiersdorf UK introduced an updated [Code of Conduct for Business Partners](#) at the end of 2022, with a compliance measurement beginning in 2023 to transition suppliers to this new, more stringent version which includes reference to regulations against the Modern Slavery Act. Among other things, the Code of Conduct prohibits the use of forced labour, inappropriate disciplinary measures, and child labour within the supply chain. Other minimum employee rights regarding working hours, remuneration and freedom of association are also covered. Targeted suppliers are required to accept the standard set out in the Code of Conduct for Business Partners and inform their employees. Diversity and equal opportunities are an essential part of the new Code of Conduct. Suppliers agree to keep adequate records to demonstrate compliance and agree that Beiersdorf UK or its nominated representative may make announced or unannounced inspections to suppliers' premises to verify compliance. Furthermore, an escalation process has been established through the Global Sustainability team; to be used in case a supplier

refuses to accept the standards set out in Beiersdorf's Code of Conduct for Business Partners.

In 2025, 92% of Beiersdorf UK's spend was with suppliers who have signed our latest [Code of Conduct for Business Partners](#). This is an increase of 9% from our 2024 coverage of 83% of spend, furthering Beiersdorf's ambition to increase year-on-year acceptance of its Code of Conduct for Business Partners among its suppliers. Further suppliers have confirmed compliance via individual commitments.

RISK ASSESSMENT, PREVENTION AND MITIGATION

Beiersdorf UK reviews annually the steps it has taken to address the risks of slavery and human trafficking in its business and supply chain, including the effectiveness of internal processes for reporting and escalation of issues.

Beiersdorf's Corporate Sustainability team annually conducts a risk assessment of all approximately 21,000 direct suppliers of Beiersdorf affiliates, including those who supply Beiersdorf UK. The process consists of appraising the country and industry related risk as well as the individual supplier's significance to Beiersdorf in terms of its expenditure and procurement category. Country and industry specific risk factors are determined by a market leading third-party sustainability risk provider.

The risk screening categorises suppliers into three risk levels: low, medium and high. Direct suppliers rated as medium risk are required to submit a comprehensive external assessment via the Ecovadis platform to enable an even more thorough risk evaluation. The Corporate Sustainability team in Beiersdorf's Headquarters in Hamburg then decides whether a subsequent on-site audit is required. On-site audits, carried out by accredited external auditors commissioned by the supplier, follow the standardized "Sedex Members Ethical Trade Audit" (SMETA) 4-Pillar Audit Protocol - this measure is also required by business partners that are rated as high risk in the initial screening. The audit results highlight specific challenges and any areas where action is required, for which our suppliers then work out corrective action plans with our support. In extreme cases, the audit results may lead to us excluding suppliers from our supply-chain network.

Additionally, Beiersdorf has an Implementation Process with regards to the Code of Conduct for Business Partners which entails risk profiling, risk assessments and audits. This is also described in the [Non-Financial Statement 2025](#). Lastly, incidents can be reported on [Beiersdorf's incident reporting platform](#). More information about this can be found on the [global website](#) and the platform itself.

DUE DILIGENCE

A substantial share of Beiersdorf's suppliers have been analysed regarding certain criteria also relating to Modern Slavery. All suppliers considered higher risk committed to follow Beiersdorf's [Code of Conduct for Business Partners](#).

Additionally, to drive ethical and sustainable improvements our top critical suppliers agreed to be part of Sedex.

Beiersdorf recognises that supply chains are highly complex and internationally intertwined and takes its responsibilities in these very seriously. Beiersdorf's Code of Conduct aims to prevent misconduct and make clear what we expect from our suppliers in terms of environmental and social responsibility. At the end of 2022, Beiersdorf's Code of Conduct was updated to follow Germany's new Supply Chain Due Diligence Act, as Beiersdorf's headquarters are based there. This law requires large companies to take responsibility for upholding human rights in their supply chains. The Code of Conduct is a binding contractual basis for compliance with human rights between Beiersdorf and its business partners along the entire value chain.

Additionally, the Beiersdorf group commits to the approach of sustainable development through the Sustainable Development Goals (SDGs) which is part of our sustainable agenda available on the [corporate website](#).

Beiersdorf also requires suppliers to engage the inclusion of modern slavery related questions in our standard tender process and part of supplier selection criteria. The supplier will then provide their modern slavery statements in support of Beiersdorf's commitment to eliminate the risk of slavery and human trafficking with reference to the supply of products and / or services.

To further our commitment to visibility and responsibility in our supply chains, in 2025 we initiated the rollout of our Full Spend Governance programme within the UK. This integration project aimed at progressively bringing a broader proportion of all suppliers spend under formal procurement governance and oversight.

Finally, Beiersdorf leverages the synergies of the recognized Sedex, EcoVadis and AIM-Progress collaborative platforms on which further information can be found in the [Beiersdorf Non-financial Statement 2025](#).

KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS TAKEN

In 2025, 160 suppliers within Beiersdorf's global supply chains have been audited according to the "Sedex Members Ethical Trade Audit" (SMETA) 4-Pillar Audit Protocol by external auditors. Furthermore, an additional 326 suppliers conducted desktop sustainability assessments via our external partner EcoVadis. Critical non-compliances have been discussed with the suppliers and corrective action plans put in place alongside regular follow ups together with the supplier and auditor. In 2025 Beiersdorf did not have any cases of supplier relationship termination due to a major breach.

In 2025, Beiersdorf strengthened its responsible sourcing approach by expanding the scope of suppliers required to sign the [Code of Conduct for Business Partners](#).

To support this, the annual spend threshold was reduced from €50,000 in 2024 to €25,000, enabling broader coverage across the supplier base in addition to increasing the company's target for Code of Conduct coverage from 60% to 75%. This initiative has been led centrally by teams at Beiersdorf headquarters, with support from local procurement teams where required. As a result, 70.9% of suppliers had signed the Code of Conduct in 2025, including suppliers newly brought into scope as part of our 'Full Spend Governance' commitment this year to bring all spend under procurement control. Ensuring supplier commitment to the Code of Conduct remained a key global procurement priority throughout 2025 and continues into 2026.

Beiersdorf also has a control measure requiring all business partners globally with an annual business volume exceeding €50,000 to have a risk profile generated through the external platform "EcoVadis IQ" during the reporting year. These supplier risk profiles enable prioritised and focused enactment of our sustainability and human rights initiatives. For the year 2025, Beiersdorf globally achieved 94% coverage of spend with business partners for volumes exceeding €50,000 in the year 2025.

In 2025, we initiated a voluntary external SEDEX/SMETA audit of our UK warehouse as part of our commitment to continuous improvement, aligning with the standards applied globally across Beiersdorf manufacturing sites. The audit covered four key pillars - labour standards, health and safety, environment and business ethics. The results of the audit revealed no material deviations from our standards. A number of best practices within our UK warehouse were observed. Any additional recommendations resulting from the audit have been implemented within the agreed timeframes and are subject to ongoing monitoring as part of our continuous improvement efforts.

We have committed internally to repeating this stringent audit process every 3 years to ensure ongoing monitoring, continuous improvement and alignment with Beiersdorf's global responsible sourcing and operational standards.

In addition, our temporary labour agency and external co-packers in the UK have completed either an EcoVadis or SMETA assessment, supporting our commitment to responsible and ethical labour practices across our supply chain.

TRAINING

It is compulsory for every employee working in Procurement at Beiersdorf to attend an internal Procurement Academy. Training of the [Code of Conduct for Business Partners](#) and human rights processes forms part of this.

Since 2020, there has been a Modern Slavery SharePoint on our UK intranet that continues to be updated and promoted as a central source of key information for all Beiersdorf UK employees. It includes our Modern Slavery Statement, year on year improvement and training material.

Future training and education on processes related to the Modern Slavery Act is available to procurement colleagues from industry bodies and networks. Members

of the local UK procurement team attended industry seminars on combatting modern slavery in 2025, with the knowledge and insights gained then cascaded to the remainder of the procurement team.

Since 2024, a wider Beiersdorf global initiative was developed that mandated new compulsory e-learnings on Human Rights and Labour Practices for the majority of our employees. These trainings focus on educating all colleagues on the risks of modern slavery and human trafficking, as well as ensuring respective labour rights are understood and implemented. In 2025, 94% of all mandated employees within Beiersdorf UK successfully completed Beiersdorf's Human & Labour Rights training.

To further improve our training and education commitments in 2026, we plan to deliver a number of targeted sessions tailored for our warehouse colleagues at our Distribution Centre in the UK. We recognize the importance of deepening our understanding in this area, as warehouse environments can sometimes present heightened risks of modern slavery. This training will focus on identifying potential indicators of modern slavery and empowering staff to take proactive measures to ensure ethical practices within all our operations.

To optimize our approach in combatting modern slavery from a sourcing perspective, 2025 saw Beiersdorf launch a comprehensive training program on our internal e-learning platform entitled 'Human and Labour Rights in Procurement'. This training was specifically developed by Beiersdorf, with modules focusing on risk profiling and aims to further upskill Procurement colleagues in understanding how suppliers are categorised and evaluated on their risk level. Further modules were added across the year, with the first focusing on an overview of the Human and Labour Rights program, the second detailing due diligence procedures for onboarding new suppliers and the third covering assessment and review of existing suppliers in relation to human rights.

CLOSING

This statement was approved by the Board of Beiersdorf UK on 22nd June 2026. It is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Beiersdorf UK's Modern Slavery and Human Trafficking Statement for the financial year ended 31 December 2025.

Signed

Jennifer Muller

Supply Chain Director Northern Europe
On behalf of the Board of Beiersdorf UK Ltd.