

**M A T A S**

Supplier Code  
of Conduct

NOVEMBER 2025

**G R O U P**

# Table of contents

- P. 3 Purpose and application
- P. 4 Matas Group vision and mission
- P. 5 Working together across the value chain
- P. 5 Corruption and bribery
- P. 6 Competition law
- P. 6 Conflicts of interest
- P. 6 Data protection
- P. 6 Money laundering
- P. 7 Intellectual property
- P. 8 Working conditions
- P. 9 Product safety and transparency
- P. 10 Climate and environmental protection
- P. 11. Compliance with Matas Group Supplier Code of Conduct
- P. 11 Procedures in the event of non-compliance
- P. 11 Reporting unlawful or unethical conduct



# Purpose and application

The purpose of Matas Group Supplier Code of Conduct (in the following referred to as “Matas Group Supplier Code”) is to set out principles, guidelines and requirements for Matas Groups suppliers and business partners (in the following referred to as “Suppliers”).

Matas Group Supplier Code is the bedrock of our collaboration with Suppliers. Matas Group Supplier Code sets out the requirements that must be met for us to enter into partnerships and relations with Suppliers.


Matas Group Supplier Code applies to all of Matas Group Suppliers and is an integral part of any supplier agreement entered into by Matas Group.

The principles in Matas Group Supplier Code applies also to the affiliates, employees, sub-suppliers and other business partners of Suppliers. Suppliers are responsible for ensuring that their affiliates, employees, sub-suppliers and other business partners acting on behalf of the Supplier are aware of and comply with the prin-

ciples of Matas Group Supplier Code. Suppliers must further ensure that all legal and necessary permits are held and valid for their operations and that necessary training is provided to all relevant employees and business partners to ensure knowledge of and compliance with the principles of Matas Group Supplier Code.

Matas Groups Suppliers must comply with applicable law and Matas Groups guidelines at all times. Matas Group Supplier Code sets the framework and principles for the conduct we expect from our Suppliers. If local, national or international regulations are more stringent than our requirements, the applicable regulations shall always prevail.

Matas Group will regularly review and revise Matas Group’s Supplier Code to ensure that it serves its intended purpose. In the event of significant updates to the principles set out in the Code we will notify Suppliers of these changes. Matas Group supplier Code of Conduct is at all times available at [www.matasgroup.com](http://www.matasgroup.com).



“Matas Group Supplier Code is the bedrock of our collaboration with Suppliers”

# Matas Group vision and mission

Matas Group exists to unite the leading beauty and wellbeing brands of the Nordics and beyond. We are home to some important Nordic brands and positioned to be the retail market leader in the Nordics within health, beauty, wellbeing and personal care products.

**Matas** is Denmark's largest health and beauty retailer established in 1949. Today, Matas has grown into an integrated omnichannel retailer with own brands, loyal Club Matas members, approx. 264 stores and Denmark's second most visited web shop.

**KICKS** is a leading player in the beauty market across Sweden, Norway, and Finland. By continuously pushing product development within the category, KICKS stays ahead of changing consumer demands. Offering constant innovation, personal service, strong product brands and a unique consumer experience, KICKS positions itself as a clear market leader.

**Firtal** is a growth-focused digital retail powerhouse that operates several web shops, including

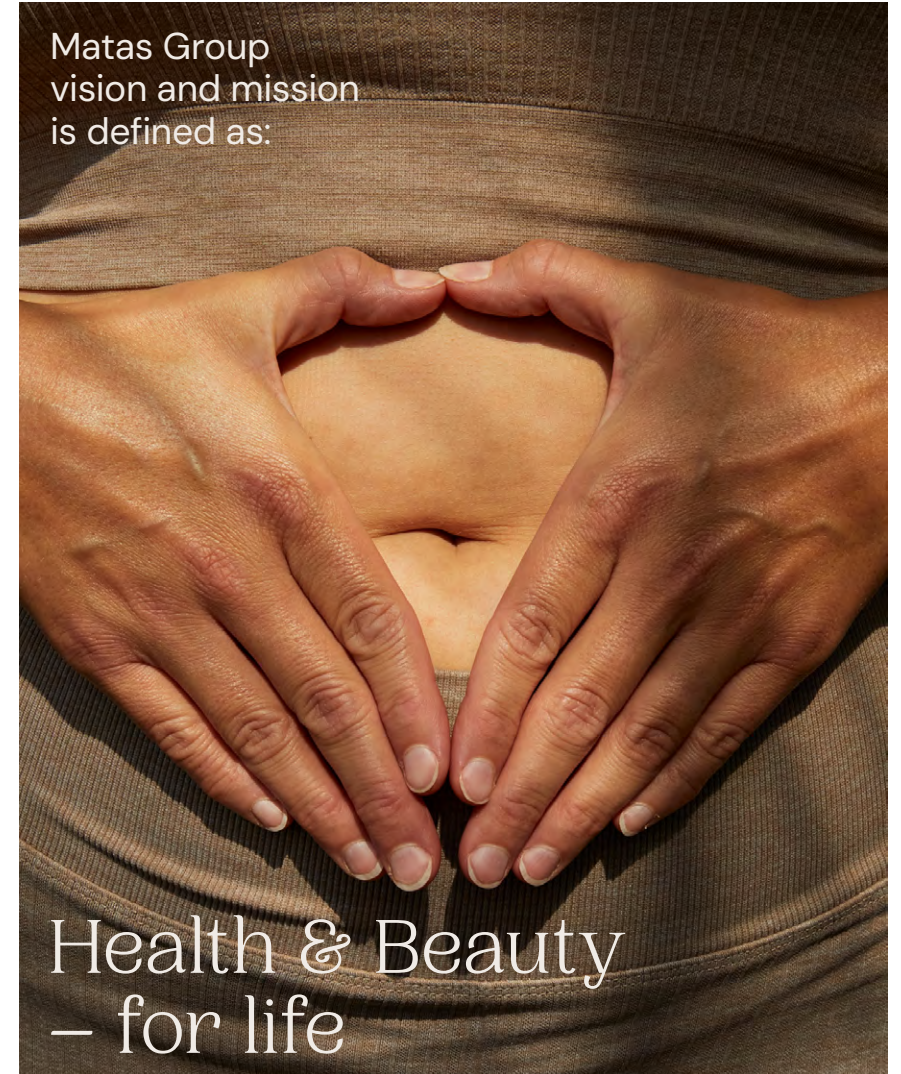
helsebixen.dk, made4men.dk, and well.dk. Firtal specializes in selling outstanding health and beauty products to men and women of all ages.

**Grænn** is the founder of some of the most wellknown Scandinavian beauty brands that represent strong Scandinavian values.

Matas Group's mission is to be the preferred life-long provider of health and beauty products and related consumer advice and take our authentic perspective to customers globally.

We have won great recognition among our customers by offering professional advice, and customer service excellence has been fundamental for creating one of the best-known retail chains in the Nordics.

At Matas Group, we work according to the highest standards when it comes to integrity, honesty and proper conduct, and we expect the same from our Suppliers, as set out in this Matas Group Supplier Code.



# Working together across the value chain

As a retail chain, a successful collaboration with our Suppliers is key for Matas Group to operate responsibly.

## Supply Chain Responsibility

We recognise that responsible business conduct is a shared responsibility, and we encourage our suppliers to take an active role in understanding and minimising the potential negative impact in their supply chains. This includes working towards transparency, collaborating with upstream partners to ensure responsible practices, and identifying risks and securing that no products are sourced from high-risk geopolitical regions under sanctions.

## Selection and working with Suppliers

At Matas Group, we strive to continuously improve and strongly believe that building long-term, collaborative relationships with our Suppliers is crucial for our business. We value honest and open communication and believe that transparency is vital to successful business relationships including transparency in our Suppliers' value chain.

We are careful and fair about how we select Suppliers. All our Suppliers are expected to comply with applicable laws and regulations including the principles set out in Matas Group Supplier Code and must act with the highest level of business, professional and legal integrity. Where relevant, we screen our Suppliers to ensure there is no indication that they will not adhere to our requirements and ethical standards.



## 01.

### Corruption and bribery

At Matas Group, we adhere to honest and ethically correct conduct. We expect our Suppliers to do the same.

**Zero-tolerance policy:** Matas Group pursues a zero-tolerance policy with respect to all forms of bribery and corruption. We do not tolerate any non-compliance with this policy on the part of our Suppliers, and we will take necessary measures to mitigate any identified violation.

**Facilitation payments:** At Matas Group, we expect our Suppliers to refrain from making facilitation payments on our behalf. If there is any doubt about the nature of a payment, and if it could be deemed to constitute a facilitation payment, it will only be approved if the Supplier provides a formal receipt or written confirmation of its lawfulness.

**Gifts, business invitations, cost reimbursement and other benefits:** At Matas Group, we expect that our Suppliers and affiliates, employees, sub-suppliers or business partners of our Suppliers under no circumstances offer, promise or give anything to any of our employees with the intention of inappropriately obtaining a contract or an order, preferential treatment or other inappropriate advantages.

Any gifts, business invitations or other benefits as well as any cost reimbursement for the benefit of our employees or related parties in the normal course of business must be reasonable in terms of frequency and value. This means that they must be of low financial value and reflect generally accepted local business practices. We also expect our Suppliers to refrain from asking employees or related parties to provide such inappropriate benefits.

## 02.

### Competition law

At Matas Group, we actively promote compliance with EU rules and relevant national competition law. We expect our Suppliers to compete in a fair way and to comply with current competition law.

## 03.

### Conflicts of interest

At Matas Group, we expect our Suppliers to make decisions on an objective basis and to avoid conflicts of interest stemming from private, business or other factors.

## 04.

### Data protection

At Matas Group, we expect our Suppliers to always comply with data protection rules when processing personal data, including the following principles:

- Data minimisation
- Provision of information to data subjects about the processing
- Safe data storage
- Erasure of data when keeping them is no longer necessary.

## 05.

### Money laundering

At Matas Group, we expect our Suppliers to comply with all current regulations concerning the prevention of money laundering and to refrain from taking part in any activity that, directly or indirectly, contributes to money laundering.

# 06.

## Intellectual Property

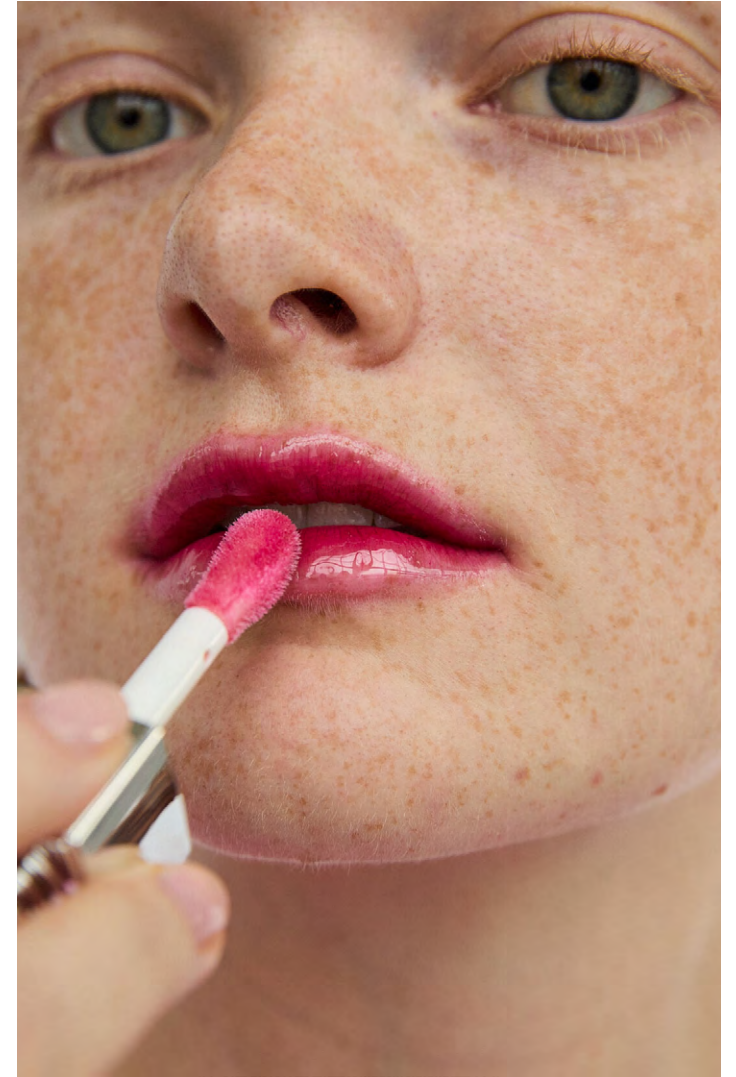
At Matas Group, we value and safeguard our intellectual property rights (e.g. trademarks, patents, copyright, etc.). Similarly, when conducting our business, we also honour any intellectual property rights belonging to third parties. We expect our Suppliers to refrain from any unlawful use of intellectual property rights (for instance unlawful exploitation of third-party trademarks) in their products and business practices.

### Confidentiality

At Matas Group, we expect our Suppliers to treat confidential and proprietary information about Matas Group with the same degree of confidentiality and care as information about their own business. Confidential information includes, but is not limited to, business strategies, partner information, personal data, processes and methods, and any other information about Matas Group and its employees that is not public. If the information is considered to have commercial value to Matas Group, such information may also constitute trade secrets which is our intellectual property.

Our Suppliers must always maintain the confidentiality of confidential or proprietary information entrusted to them by Matas Group or other companies, including Matas Group's suppliers and customers. Unauthorized disclosure of any confidential or proprietary information is prohibited.

Confidential or proprietary information and trade secrets must be safeguarded and must never be disclosed to any unauthorized party, either within Matas Group or to a third party, unless such disclosure is necessary, in which case a non-disclosure agreement must be entered into. Our Suppliers must respect these confidentiality provisions, even after their engagement with Matas Group ends.



# 07.

## Working conditions

At Matas Group, we believe in fair and safe working conditions for all people involved in our supply chains. We expect our Suppliers to respect internationally recognised human rights and labor standards, and to actively ensure that workers are treated with dignity and fairness.

**Pay and working time conditions:** At Matas Group, we expect our Suppliers to comply fully with national laws and regulations concerning working hours, pay, overtime pay and other employee benefits.

**Diversity and non-discrimination:** At Matas Group, we work actively to ensure inclusion and diversity at our workplaces and when interacting with the outside world. Similarly, we expect our Suppliers to promote equal opportunities for all their employees, customers and when interacting with the outside world for instance via product creation, regardless of ethnic origin, colour, gender, sexual orientation, age, disability, religion, nationality, social background, political views or any other circumstances that could be used to discriminate.

**Protection from harassment and bullying:** At Matas Group, we expect our Suppliers to take measures to protect their employees from physical, verbal, sexual or psychological harassment, bullying

or the use of threats at the workplace from other employees, including managers and colleagues.

**Freedom of association:** At Matas Group, we expect our Suppliers to respect the rights of their employees to form worker's councils, join a labour union or other employee representations and to enter into collective pay agreements in accordance with national laws and regulations.

**Child labour and forced labour:** At Matas Group, we expect our Suppliers to ensure that children are protected from all forms of work that puts their health, schooling and/or development at risk. We also expect our Suppliers to ban and refrain from all forms of forced labour within their organisation. All the Supplier's full-time employees must be at least 15 years of age. Suppliers must not take on employees under the age of 18 for tasks involving hazardous work that could harm the employee's physical or mental health or safety.

**Modern slavery and human trafficking:** At Matas Group, we expect our Suppliers to ban and refrain from all forms of slavery and human trafficking.

**Human and Labor Rights Due Diligence:** As a member of amfori BSCI, Matas Group has adopted the amfori BSCI Code of Conduct which is based on the United Nations Declaration of Human Rights, ILO Conventions and the OECD Guidelines for Multinational Enterprises amongst others. We expect our suppliers to abide by the same Principles and Conventions. By entering into an agreement with Matas Group, the suppliers acknowledge having all necessary processes and controls in place, to ensure that their business is not in violation of the Principles and Conventions.

Where suppliers operate in or source from areas with higher risks of human rights violations, we expect that our suppliers demonstrate a heightened level of due diligence, including proactive risk assessments and audits and can show that they ensure dialogue with local stakeholders to promote ethical practices throughout their value chain.



# 8.

## Product safety and transparency

### Product safety

We expect our Suppliers to comply with all product safety laws and regulations and to stay up to date on new initiatives and regulations that may affect the lawfulness and safety of their products.

We do not promote cosmetic products targeted for adults to children. We therefore expect our Suppliers to ensure that products targeted at children are appropriate to use taking their age in consideration.

We expect our Suppliers to respond quickly and loyally if we reach out to them if the safety of lawful ingredients is questioned by the industry or society, with a view to determining the extent to which such ingredients are used.

We are constantly monitoring current and upcoming legislation to ensure compliance and product safety, and we expect our Suppliers to do the same. Our ambition is always to think one step ahead and to evaluate potential reasoning for setting higher demands that current legislation when it comes to controversial and debated ingredients and/or chemicals. In such cases, we

consider multiple factors, including health and safety, environmental impact, and product safety, to ensure we make an informed decision before taking any action. This is further reflected in our In-House Brand Group Ingredients Policy for development of Cosmetic Products, which is under constant review.

We expect our Suppliers to refrain from using PFAS in product formulations. Where PFAS has not yet been phased out, Suppliers must inform us via [feedback@matas.dk](mailto:feedback@matas.dk), specifying which products are affected and outlining how they are actively working towards elimination. We also expect Suppliers to be transparent about any current use and to pursue safer alternatives in line with the latest scientific and regulatory developments.

### Using nutrition and health claims for food products and supplement marketing

We expect our Suppliers, when marketing the food products and supplements they sell to Matas Group, to comply with applicable rules and to only use approved nutrition and health claims as laid down in the Health Claims Regulation and its implementing provisions.



# 9.

## Climate and environmental protection

### Climate mitigation and adaptation

At Matas Group, we recognize that addressing climate change requires shared commitment and transparency across our entire value chain. We rely on partnerships with Suppliers who are willing to take meaningful steps to reduce their climate impact. Consequently, we ask our Suppliers to demonstrate real ambition to reduce carbon emissions.

For larger and medium-sized Suppliers, as well as those who own or operate production facilities, regardless of their size, we require proactive climate action. This includes setting science-aligned climate targets — for example, through the Science Based Targets initiative (SBTi) or equivalent frameworks — and developing clear plans for reducing their greenhouse gas (GHG) emissions over time.

For all Suppliers, regardless of size or role, we expect that they engage in open dialogue with their manufacturers and other partners in their supply chain to better understand the energy use and the overall climate footprint of their products. We believe that greater awareness leads to better decisions, and we expect that our Suppliers actively work to improve energy

efficiency, adopt renewable energy sources, reduce packaging and make informed, climate-conscious choices in sourcing and production.

We are committed to working together towards climate solutions, and we appreciate our Suppliers' efforts to build a more resilient and low-carbon future.

### Responsible water consumption and wastewater treatment

At Matas Group, we expect our Suppliers to use water responsibly and to continuously seek ways to reduce water consumption across their operations. Especially in areas facing water stress, thoughtful water management is essential. Suppliers are expected to monitor their water use, improve efficiency, and ensure that wastewater is treated appropriately and in line with local regulations, to minimise any negative impacts on the environment and the communities they operate near.

### Protection of biodiversity and ecosystems

At Matas Group, we value the protection of nature and expect our Suppliers to consider the impact of their operations on biodiver-

sity, deforestation and surrounding ecosystems. Where natural raw materials are used, we expect that our Suppliers support the responsible sourcing of materials and ingredients. We encourage the use of certified palm oil, such as RSPO-certified materials, and other practices that contribute to the long-term health of ecosystems.

### Responsible use of resources and efforts to promote circularity

At Matas Group, we expect our Suppliers to use resources thoughtfully and to look for opportunities to minimise the use of virgin materials and to reduce waste. We value innovation in the use of recycled and renewable materials in product packaging. We expect our Suppliers to design product packaging with recyclability in mind, and clear guidance should be provided to end-users to help ensure proper disposal and recycling.

### Using climate or environmental claims for product marketing (Greenwashing)

To avoid greenwashing on Matas Groups' own media, we expect our Suppliers to always, on request, be able to provide documentation for any climate or environmental claims used for products supplied to Matas Group, whether concerning products or packaging.

# 10.

## Compliance with Matas Group Supplier Code of Conduct

Matas Group reserves the right to regularly and systematically check a Supplier's compliance with the principles and requirements laid down in Matas Group Supplier Code. This check may be in the form of:

- **Self-evaluation:** Matas Group may ask the Supplier to fill in a self-evaluation form;
- **Certifications/Statements:** When a Supplier uses or communicates about certifications and standards, Matas Group may ask the Supplier to provide the necessary documentation to demonstrate compliance with the used certifications and standards.
- **Data sharing:** Our Suppliers must act promptly and cooperatively in matters where we request information needed for compliance such as, but not limited to, information about product safety, reporting or other ESG matters.

- **Audit:** Matas Group may demand access to all relevant documentation from the Supplier in the event of suspected violation of any of the principles set out in Matas Group Supplier Code.

Furthermore, we expect our Suppliers to have processes in place that enable them to systematically identify and address violations of laws, business etiquette and ethical guidelines. Matas Group expects a Supplier's processes to be commensurate with its size, available resources and risk profile and to be aligned with the severity and likelihood of such negative impacts as a violation could cause.

In the event of a violation of the principles set out in the Matas Group Supplier Code, the Supplier must (i) immediately notify the relevant contact person at Matas Group and (ii) without undue delay restore compliance with Matas Group Supplier Code.

# 11.

## Procedures in the event of non-compliance

Any non-compliance with Matas Group Supplier Code on the part of a Supplier will be deemed to constitute a breach of the Supplier's contract with Matas Group. Matas Group reserves the right to terminate any agreement in the event of a breach of one or more of the principles set out in Matas Group Supplier Code.

# 12.

## Reporting unlawful or unethical conduct

Any breach of laws, regulations or company guidelines, including Matas Group Supplier Code, may always be reported to the Supplier's contact at Matas, KICKS, Firtal, Grænn or Websundhed or anonymously via Matas Groups whistleblower services at either <https://www.matas.dk/whistleblower> (for breaches in relation to Matas, Firtal, Grænn or Websundhed) or <https://report.whistleb.com/sv/Kicks>. (for breaches in relation to KICKS)

## ESG at Matas Group

For more information on Matas Group's policies, ESG strategy, actions and targets, please see [www.matasgroup.com](http://www.matasgroup.com).



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