

FARCOM S.A

SUPPLY CHAIN POLICY

Version: 1.0

Effective Date: 07/01/2026

Annual Review: until 07/01/2027 or earlier in case of changes

Table of Contents

1. Purpose	3
2. Scope.....	3
3. Link to Sustainability and ESG Principles	4
4. Supplier Code of Conduct.....	4
5. Supply Chain Risk Assessment.....	4
6. Transparency and Provision of Information	5
7. Complaints and Reporting Mechanism	5
8. Gradual Goal Setting.....	6
9. Sustainability Officer and Training on Supply Chain Transparency.....	7
10. Review and Update.....	8

1. Purpose

This Policy is issued by **FARCOM S.A. COSMETICS COMPANY** in order to clearly describe the manner in which the Company organizes, monitors, and improves its supply chain. Through this Policy, the Company ensures that the products, materials, and services used or distributed by the Company are safe, of high quality, compliant with applicable legislation, and aligned with customer requirements, while also promoting the gradual integration of sustainability (ESG) principles into all relevant activities.

The Company recognizes that responsible operation is not limited to its own facilities but extends across all links of the supply chain. Therefore, it requires corresponding responsibility from its partners and collaborators.

2. Scope

This Policy applies to all Company activities related to the procurement, production, storage, transportation, and distribution of cosmetics and associated products. It covers all finished and semi-finished products; all raw and auxiliary materials such as chemicals, fragrances, pigments and dyes; all packaging materials and packaging means; as well as services supporting production and distribution, including third-party manufacturing, packaging, storage, transportation, logistics, and laboratory testing services.

This Policy applies to all personnel involved in these activities, including when such personnel are provided through third parties.

Furthermore, the Policy covers not only the Company's direct suppliers but also, based on risk assessment, critical sub-suppliers, subcontractors, or service providers that may affect the safety, quality, compliance, or sustainability of products supplied to the Company. In this way, the scope is not limited to Suppliers but extends across the entire supply chain.

3. Link to Sustainability and ESG Principles

The Company progressively integrates environmental, social, and corporate governance principles into its supply chain management. This means that in selecting and monitoring partners, the Company considers not only technical specifications and price, but also compliance with legislation, environmental protection, assurance of decent and safe working conditions, respect for human rights, and business integrity.

This Policy operates in synergy with the Company's Supplier Code of Conduct, which has already been issued and communicated to partners, so that the same principles apply across all parties involved in the supply chain.

4. Supplier Code of Conduct

The Company has established a Supplier Code of Conduct, which sets out the minimum requirements that suppliers and other partners must meet. This Code covers legal compliance, human and labor rights, occupational health and safety, environmental responsibility, anti-corruption, data protection, and confidentiality.

The Code is communicated to partners, and written acceptance is requested, or its incorporation into contractual terms of purchase orders and agreements. Compliance with the Code is a condition of cooperation, and the Company reserves the right to request evidence of compliance or to conduct assessments where required.

5. Supply Chain Risk Assessment

The Company has implemented a Supplier Risk Assessment process for its supply chain. This assessment takes into account the nature of the product or material (particularly for high-risk raw materials such as coconut oil, palm oil, and shea butter, cosmetic ingredients, fragrances, pigments, and packaging materials), the country of origin, the importance of the material or service to final product safety and quality, the partner's compliance history, and specific customer or regulatory requirements.

In parallel, the assessment incorporates sustainability criteria related to social and ethical issues and to the principles of the International Labour Organization (ILO), such as the prohibition of child and forced labor, the avoidance of discrimination, the

assurance of occupational health and safety, the provision of fair wages and reasonable working hours, as well as business integrity and anti-corruption.

Based on these criteria, partners are categorized into risk levels, and the frequency or depth of monitoring is adjusted accordingly. Higher-risk partners may be required to provide additional information and certifications or to undergo on-site or remote assessments. This classification is reviewed at least annually, or earlier where material changes arise, to ensure that monitoring remains truly risk-based and reflects updated data regarding suppliers' social, ethical, and environmental performance.

6. Transparency and Provision of Information

The Company requires all parties involved in its supply chain to fully cooperate in providing information regarding the origin of products and materials, the location of production, any use of sub-suppliers or subcontractors, and any material change that may affect the safety, quality, or compliance of supplied materials and services.

The Company maintains and updates a register of its direct suppliers and supplements this register with additional information for partners assessed as higher risk. Where required by customers or legislation, the Company may use such information to substantiate product origin and compliance.

7. Complaints and Reporting Mechanism

As part of responsible supply chain management, the Company has established a mechanism through which employees, suppliers, and other partners may report in good faith potential breaches of the Supplier Code of Conduct or this Policy, as well as incidents relating to human rights, environmental impacts, or other non-compliance within the supply chain.

Such reports are recorded, assessed by the competent departments, and where necessary lead to corrective or remedial actions. The Company seeks to ensure confidentiality of reporters to the extent permitted by applicable law and to address reports without discrimination or retaliation.

8. Gradual Goal Setting

The Company's Senior Management is committed to progressively setting specific objectives related to transparency and sustainable operation of the supply chain, such as increasing the percentage of suppliers that have accepted the Supplier Code of Conduct, improving the completeness of origin data, or expanding risk assessment to additional categories of partners. These objectives may be accompanied by measurement indicators and timelines, enabling the monitoring of progress and the documentation of improvements to stakeholders.

Specifically, Senior Management commits to establishing qualitative and/or quantitative supply chain objectives under the pillars of Environment, Society, and Governance by defining Key Performance Indicators (KPIs) and setting clear implementation timelines. Each objective is accompanied by a deadline and corresponding KPIs through which the Company's performance is monitored and progress is evaluated. Objectives and KPIs are developed according to the SMART model, i.e., they are Specific, Measurable, Achievable, Relevant to the Company's strategy and material impacts, and Time-bound.

To achieve these objectives, a specific action plan is developed, setting out the required actions, responsible persons, timelines, means and resources allocated, and the monitoring and review approach for KPIs. The Company sets short-, medium-, and long-term supply chain objectives, combining immediate improvements with more strategic interventions. Objectives are selected based on risk assessment outcomes, regulatory and contractual requirements, stakeholder expectations, and the Company's overall ESG sustainability strategy, so as to address its most material impacts and priorities.

The following supply chain objectives have been established:

1. Increase the percentage of suppliers that have accepted and apply the Supplier Code of Conduct to $\geq 30\%$ by the end of 2026, $\geq 50\%$ by the end of 2028, and $\geq 90\%$ by the end of 2029.

2. Implement systematic ESG risk assessment for 100% of key and high-risk suppliers by the end of 2026.
3. Ensure respect for human and labor rights in the supply chain with zero incidents of violations by the end of 2029.
4. Promote responsible occupational health and safety practices in the supply chain with $\geq 70\%$ of suppliers having an OHS policy or certification (e.g., ISO 45001) by the end of 2029.
5. Improve environmental compliance and responsible supplier practices with $\geq 60\%$ of key suppliers having ISO 14001 or an equivalent system by the end of 2029.
6. Enhance supply chain transparency and traceability with $\geq 80\%$ of critical raw materials having documented traceability by the end of 2029.
7. Ensure compliance with Regulation (EU) 2023/1115 (EUDR) in the supply chain, with 100% of EUDR-relevant products fully mapped and subject to due diligence by the end of 2026.
8. Full compliance with EUDR requirements, with 100% of products falling under the EUDR fully compliant by the end of 2026.

Each Company department adapts this Policy into its operational planning and integrates the relevant requirements. The Policy is communicated to all employees and relevant stakeholders to ensure understanding of the objectives and obligations arising from it. All employees receive, at minimum, basic training on ESG and supply chain topics, so they understand their role in achieving transparency and sustainability goals and can meaningfully contribute to the implementation of this Policy.

9. Sustainability Officer and Training on Supply Chain Transparency

The Company has appointed a competent team and designated the QA Manager as the Sustainability Responsible for the Supply Chain, with specific responsibilities for managing, monitoring, and promoting supply chain transparency and sustainable operation. Members of the sustainability team possess appropriate qualifications and expertise, including knowledge in supply chain management, quality and product

safety, environmental management, human rights, labor law, corporate governance, and business ethics.

The Company ensures continuous training and development for the sustainability team, with emphasis on supply chain transparency, international standards, and best practices (e.g., traceability, supplier risk assessment, social and environmental audits, customer and market requirements). Training may include participation in seminars, conferences, specialized programs, internal trainings, and knowledge-sharing between departments.

Senior Management ensures that the responsible person and the sustainability team have adequate and relevant resources (time, tools, access to information and systems, and the ability to collaborate with other departments) to perform their role effectively. At the same time, appropriate awareness and training on basic supply chain transparency principles is also provided to other key roles and departments (e.g., procurement, production, warehousing, quality) to ensure common understanding of this Policy's requirements and consistent application in daily operations.

10. Review and Update

This Policy bears a date and previous versions are maintained on record. The Company reviews the Policy at least once per year or earlier if changes occur in legislation, customer requirements, risk assessment outcomes, or internal Company processes that necessitate an update. During review, the reasons leading to the modification and the changes made are recorded, ensuring history and transparency.

The President of the Company

07/01/2026


FARCOM A.E.
ΠΑΡΑΓ. & ΕΜΠΟΡ. ΚΑΛΥΠΤΗΡΙΩΝ - ΕΙΔΩΝ ΚΟΜΜΟΤΗΡΙΩΝ
ΒΙ. Π.Ε. Η. ΠΑΙΔΕΥΣΗΣ - Τ.Κ: 570 01 - Τ.Θ: 60691 - ΘΕΣΣΑΛΟΝΙΚΗ
ΤΗΛ: 2310 837077 - ΦΑΞ: 2310 833222
ΑΦΜ: 095529004 - ΑΔΥ: ΟΑΕ ΒΕΣ/ΝΙΚΗΕ
ΑΡ. ΓΕΜΗ: 38365205000 - ΑΜΤ: 3348