

ESG REPORT

ENVIRONMENTAL SUSTAINABILITY

SOCIAL RESPONSIBILITY

AND CORPORATE
GOVERNANCE REPORT

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A MESSAGE FROM THE FOUNDER

THE OCEAN OF WASTE

Sustainability dawned on me when I was a teenager - I visited a waste incineration plant near Tokyo. There I saw it all - compressed trainers, toys and parts of devices sticking out of a sticky grevish river, running towards its final transformation into heat and flue gas. Even though it's nicely managed, smart chimneys try to filter toxic dioxin and furans, and energy is used for heating homes, the incredible amount of waste consumer societies produce is scary. But the scariest thing is the fact that a large part of the waste does not come from the items we use – it comes from the way they're wrapped. "Pure" PACKAGING. And sadly, only a minor part of the packaging is recycled and lives another happy life. Most of it is burnt, buried or ends up in the ocean or the forest.

For me and for MÁDARA, producing a sustainable product is kind of religious. We have had 100% recyclable packaging since day 1 (in 2006), while the EU and some industry competitors set this as a target for 2030. We started collecting empty cosmetic packaging back from our consumers in 2009. We did it to raise awareness and promote recycling – even small eye cream tubes. Every little detail and process matters, and there are always things we can do better.



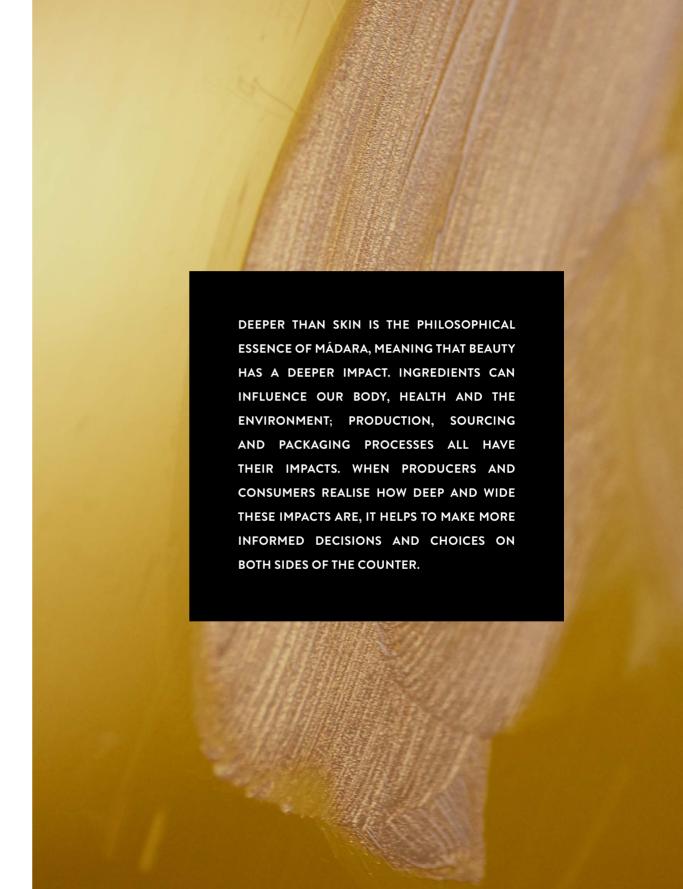
In our last full operating year, we used 100% green electricity, launched the first product in plant-based packaging, developed new ocean-friendly formulas and worked on new packaging made from ocean waste.

We at MÁDARA are happy to observe that sustainability, packaging, recycling have become trendy topics, discussed by media, influencers and consumers much more often. It is cool and instagrammable to collect waste at the beach.

I hope you enjoy our 3rd ESG report. It highlights important sustainability, corporate social responsibility, and corporate governance practices of the company. Being one of the pilots of the Nasdaq Nordic ESG Pilot programme, this report includes metrics outlined in the Nasdaq ESG REPORTING GUIDE 2.0.

Save the planet in style!

Lotte Tisenropk-Klinere
MÁDARA founder



DEEPER THAN SKIN

ESG PERFORMANCE AT A GLANCE

2018

CERTIFIED NATURAL



MÁDARA cosmetics are certified according to the international ECOCERT or COSMOS standards, which defines and supervises ingredient sourcing, packaging and manufacturing processes.



OWERED BY 100% REEN ELECTRICITY

In 2018, all electricity consumed came from 100% renewable sources.



FIRST PRODUCT DEVELOPED IN PLANT-BASED PACKAGING



Our primary packaging (e.g. bottles, flacons) is made of recyclable materials.

LOW CO₂ EMISSION 113 tons in 2018



GENDER DIVERSITY RATIO

Female employees at MÁDARA: 70.37%

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143

During 2018, we have helped around 143 children and youngsters

HELPING THE COMMUNITY

Our contribution to NGO MARTA in 2018 provided 500 FREE of charge legal and psychological consultation sessions for victims of human trafficking and domestic violence, mostly women and children. THIS MEANS 10 CONSULTATIONS PER WEEK.



WHAT IS ORGANIC IN BEAUTY?

SORTING OUT CERTIFICATIONS

Unlike the food industry where organic product manufacturing, labelling and retail is controlled by the European Union regulation for organic agriculture, the legal framework of cosmetics does not distinguish between synthetic conventional and natural/organic products. Following the rising consumer demand for pure, organic and clearly labelled beauty goods, several organisations in Europe have created standards for formulating and labelling natural and organic cosmetics.

COSMOS ORGANIC

COSMOS is the first and only pan-European standard for organic and natural cosmetics, created by several associations and organic cosmetics certification bodies: BDIH (Germany),

COSMEBIO (France), ECOCERT GREENLIFE (France), ICEA (Italy), SOIL ASSOCIATION (United Kingdom). According to COSMEBIO, 85% of organically certified cosmetics across the world are certified according to the international COSMOS standard.

Examples of certification bodies, which use COSMOS standard: (A) (A) (A)



Natrue is another organisation, which primarily unites German-based natural cosmetic manufacturers. Natrue has developed its own natural cosmetics standard, which has slight

differences from the COSMOS standard. The key difference is that the Natrue certification inspects the product ingredients and labelling, but does not inspect the manufacturing site.



Recently the International Standardisation Organisation (ISO) published a guideline for natural beauty products. The guideline is considered controversial and "weaker"

than ECOCERT/COSMOS or Natrue because it permits petrochemical and GMO (genetically modified) ingredients. The ISO natural beauty standard should not be with other ISO standards, such as Guidelines on Good Manufacturing Practices (GMP) for cosmetic products.

The main issues regarding of ISO 16128 are:

- There are no criteria for the composition of the final products, not for the labelling.
- Synthetic/petrochemical ingredients such as silicon, mineral oil, etc. can be present at a high level in a product, which could claim natural or organic content.
- GMO ingredients are permitted.
- No third party control is required to attest compliance with the criteria.

OUR CERTIFICATES

MÁDARA products are certified by ECOCERT/ COSMOS, which allow consumers to know that the product meets the international criteria of natural or organic cosmetics and is free from petrochemical ingredients such as synthetic fragrances, harsh preservatives etc.







ECOCERT GREENLIFE SAS is an organic certification organisation, founded in France in 1991. ECOCERT was the very first to develop standards for natural and organic cosmetics. The organisation is based in Europe but conducts inspections in over 80 countries, making it one of the largest organic certification organisations in the world. ECOCERT currently supports and guides more than 1,000 companies through their certification processes. From January 2017, ECOCERT certifies cosmetic formulations according to the COSMOS standard.



HOW DO THEY DIFFER?

NATURAL COSMETICS CERTIFICATION STANDARDS

	COSMOS ORGANIC COSMOS NATURAL	NATRUE	ISO 16128
Precise ingredient rules	YES	YES	NO
Precise labelling rules regarding natural or organic product	YES	YES	NO
Petrochemical ingredients	NO	NO	YES
GMO	NO	NO	YES
Producer inspection	YES	NO	NO
Recycable packaging	YES	NO	NO







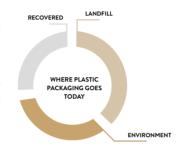
FACING THE OCEAN

IN 2018, EACH MINUTE A BIN TRUCK OF PLASTICS ENDED UP IN THE SEA. IF GLOBAL CONSUMERS, PRODUCERS AND AUTHORITIES KEEP DOING LIKE TODAY, PLASTIC PRODUCTION IS EXPECTED TO TRIPLE BY 2050, EXCEEDING THE AMOUNT OF FISHES IN THE OCEAN.

While plastic is present in almost everything around us – from electronics to medical tools to furniture, product packaging is the sector that increasingly uses most plastic raw material (40% in 2015, EU) and generates 60% of plastic waste (2015, EU). To reduce the plastic pollution of the environment, the packaging practices and policies are to be addressed firsthand.

Milk in a glass bottle?

Would milk in a glass bottle save the planet? Actually no. Plastic packaging typically has a lighter environmental footprint compared to glass and aluminium, as it requires up to 15 times less water and emits 5 times less greenhouse gas to produce one unit. The problem is that only every third empty plastic bottle is recycled, the other two end up in the landfill and in the sea. Why so? There are many plastic types that are currently not recyclable, recycling infrastructure and consumer knowledge and behavior varies greatly across countries.



So plastic, so different

Plastic is a polymer and there are many variations of it. The type of plastics used for packaging significantly impacts the environmental footprint. In fact, only few types of plastics can currently be recycled. PET and HDPE bottles, PP containers, LDPE bags can be recycled again and again, while harder forms of plastic, such as acrylic glass, ABS or SAN cases often used for cosmetics and makeup usually end up either in the ocean or on a meadow.

From petrochemicals to corn to algae

Now we have to mention the biodegradable plastics. In fact, it sounds lovelier than it actually is. We can distinguish at least two types of biodegradable plastics – fossil-based and renewables-based. The first type basically means that a petrochemical polymer is mixed with biodegradability-boosting additives, which fastens the speed of decomposition. However, it does not turn to a humus, but rather to microplastics, which further compromises environment, wildlife and human health. The renewables-based biodegradable plastic is usually produced from cellulose (corn, potatoes, etc.), and has much better environmental perspectives than petroleum-derived. Current application examples include bio shrink wrap foils, 3D printer polymers, single use cutlery and others. However, recycling infrastructure for biodegradables varies a lot across regions.





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4TH GENERATION
From biogas such as

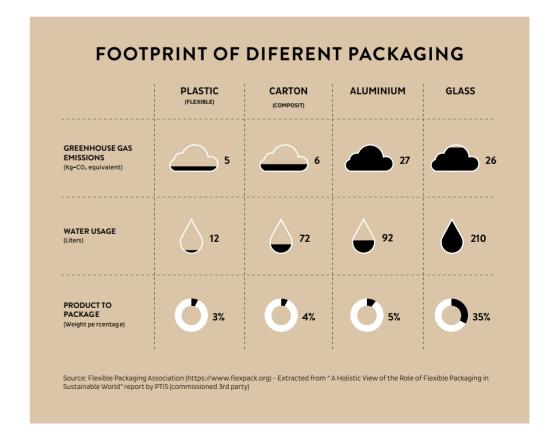




While the biodegradable plastic dream is being challenged a lot, the new hope for more sustainable packaging comes from plant-based materials, which can be used to produce polymers with almost identical properties as the regular petrochemical plastics. Sourcing packaging polymers from plants like sugarcane significantly lowers the CO2 emissions compared to producing fossil-based bottles. The big difference from biodegradable plastics is that consumers must dispose them in the recycling bin for plastic, and they can be processed together with a regular petrochemical packaging. The first generation of plant plastics was produced from food crops, which involved ethical issues regarding food competition. The second generation of plant packaging is generally sourced from agricultural waste, such as leftovers from sugar production. The next generation of plastics is expected to be derived from algae.

Must act fast

The ocean is filling up with waste, so authorities and companies are committing to new environment-saving targets. While a few sustainability-driven producers and brands have pioneered 100% recyclable packaging approach even decades ago, the EU strategy for plastics for a Circular Economy aims for 100% recyclable/reusable packaging and 55% recycled waste by 2030. Similar targets are set by companies like Loreal, P&G and Weleda, still packaging their product in landfill formats today. But we have good news as well – there are enterprises that clean up the plastics of the ocean and actually produce new usable things from the waste.



DEEPER THAN SKIN DEEPER THAN SKIN

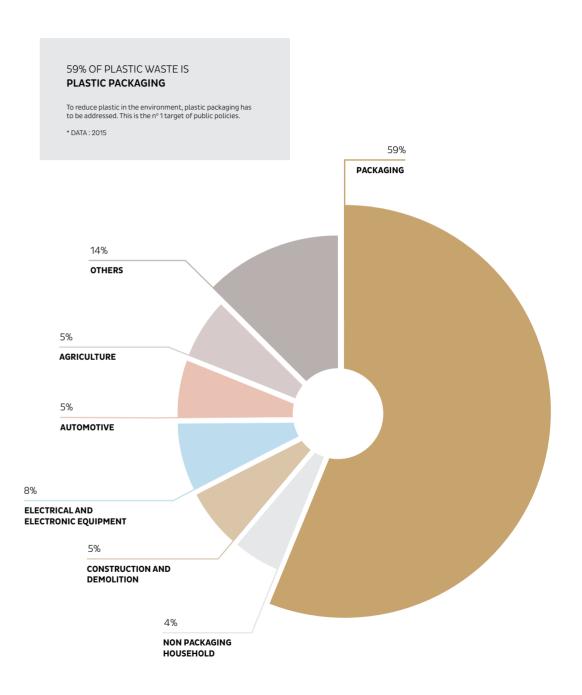
PACKAGING COMMITMENTS OF THE INDUSTRY

100% Recyclable since 2006 L'ORÉAL 100% Recyclable or reusable by 2025 WELEDA 75% Recyclable by 2025 100% Recyclable by 2030 EU STRATEGY 100% Recyclable by 2030



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EU PLASTIC WASTE GENERATION*





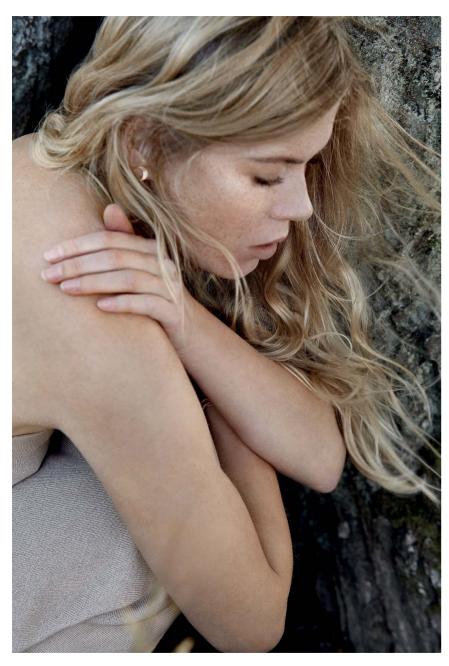
HANDBOOK OF PLASTIC PACKAGING TYPES

	NON-RECYCLABLE PLASTICS	RECYCLABLE PLASTICS	PETROLEUM BIODE- GRADABLE PLASTIC, OXO-BIODEGRADA- BLE PLASTIC	PCR, BIOBASED BIODEGRADABLE AND COMPOSTABLE PLASTIC	POST-CONSUMER-RECYCLED (PCR) AND POST-INDUSTRIAL-RECYCLED (PIR) PLASTIC	SUGARCANE PLASTIC
Origin	petroleum (non-renewable source material)	petroleum (non-renewable source material)	petroleum (non-renewable source material)	biobased materials, such as cellulose (renewable source material)	petroleum (non-renewable source material)	sugarcane or sugarcane+wood (renewable source material)
Sourced from	oil fields	oil fields	oil fields	cotton wood waste	landfills or ocean, plastics industry leftovers	sugar and wood production waste
Terminology	virgin/raw plastics	virgin/raw plastics	biodegradable	biodegradable	sometimes called eco plastics, recycled	bioplastics/biobased but NOT biodegradable
Decomposition time under perfect conditions	doesn't decopose (PVC) 50 years (PS)	5-10 years (PET) 100 years (HDPE) 500 years (LDPE) 1000 years (PP) ! But can be re-used	depending on the plastics type, from 3months-3years	depending on the plastics type, from 3 months-3 years	5-10 years (PET) 100 years (HDPE) 500 years (LDPE) 1000 years (PP) ! But can be re-used	5-10 years (PET) 100 years (HDPE) 500 years (LDPE) 1000 years (PP) ! Better for soil than plastics that are petroleum based ! But can be re-used
CO2	high consumption	high consumption	high consumption	better than for virgin/ raw	-40-50% compared to virgin/raw	-40-50% compared to virgin/raw
Controversy	non-renewable resource, CO2 intensive, not possible to reuse	non-renewable resource, CO2 intensive	turns into microplastics, ends up in water system, soil, might be toxic	some types might need very high termperatures (e.g. 60 degrees Celsium) in order to decompose, which means they would not decompose in nature under normal conditions	only food-grade PCR and PIR suitable for cosmetics, some packagings cannot be 100% PCR due to technical reasons	taking up fields that are for food (even though sugar drawn from sugarcane is considered as food additive), for comparison – the area used for plastics is like cherry tomato versus Eifel tower
MADARA products	none	all MÁDARA packaging	none	100% cellulose based compostable warp foil: INFINITY Drops Immuno-serum INFINITY Mist Probiotic essence	100% PCR/PIR plastic: Clarifying toner bottle Balancing toner bottle Comforting toner bottle COMFORTING TONERS AND REPAIR Shampoo bottle COLOUR AND SHINE Shampoo bottle GLOSS AND VIBRANCY Shampoo bottle INFUSION VERT Firming Antioxidant Body Oil bottle BOOST 3-Min Growth-Boost Scalp Treatment bottle GROW Grow Volume Shampoo bottle S5% PCR/PIR plastic: INFUSION VERT Intense Antioxidant body cream tube INFUSION VERT Repairing Multi-Layer hand cream tube COLOUR AND SHINE conditioner tube GLOSS AND VIBRANCY conditioner tube GLOSS AND VIBRANCY conditioner tube 50% PCR/PIR plastic: SOS Eye Revive cream & mask tube 20-80% PCR/PIR plastic: BOOST Hyaluronic Collagen Booster Ampoules BOOST Antioxidant Energiser Booster Ampoules BOOST Amino-fill 3D Lifting Booster Ampoules 100% OCCAN waste plastic: Purifying foam 100ml bottle	100% sugarcane plastic: INFUSION VERT Molisture soap bottle INFUSION BLANC Molisture soap bottle MINT ABSINTHE Molisture soap bottle 95% sugarcane+ wood plastic: GROW Volume Conditioner tube DAILY DEFENCE Ultra Rich balm tube





ENVIRONMENTAL SUSTAINABILITY ENVIRONMENTAL SUSTAINABILITY



Named the No. 1 greenest and most sustainable enterprise in Latvia by Green Dot three times, MÁDARA believes that care for the environment and sustainable business practices are at the core of the future economic and social wellbeing of the planet.

MÁDARA manufactures certified organic and natural skincare products, using organic and natural raw materials, recyclable or post-consumer recycled packaging and processing/manufacturing techniques that are clean and respectful of human health and the environment. With 93% of plant-based ingredients¹ being certified organic, MÁDARA promotes organic agriculture and biodiversity, restricts the use of chemicals, such as pesticides, and harmful chemical processing.

MÁDARA products are certified by ECOCERT according to the international ECOCERT/COSMOS standards, which define and supervise ingredient sourcing, packaging and manufacturing processes. Along with ISO GMP standards, the ECOCERT voluntary organic certification underlines our commitment to creating innovative skincare products that are safe both for humans and the planet.



 $^{\mbox{\tiny 1}}\mbox{plant}$ oils, plant extracts, waxes, butters, floral water $% \mbox{\ and }$ similar



ECOCERT/COSMOS requires a certified producer to have an environmental policy, which addresses the whole manufacturing process and all the residual products and waste resulting from this. MÁDARA's environmental management plan includes monitoring procedures for all the key environmental impact indicators, which allows one to evaluate and improve the environmental performance of the enterprise each year:

> CO, emissions

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- > Rainwater pollution
- > Energy consumption
- > Waste management
- > Water consumption > And others

Striving to be among the pioneers of sustainable manufacturing business, MÁDARA recognises that sustainability is a mindset rather than state of the art. Therefore, the Company continuously rethinks and restructures sourcing, production, packaging, delivery and other practices.

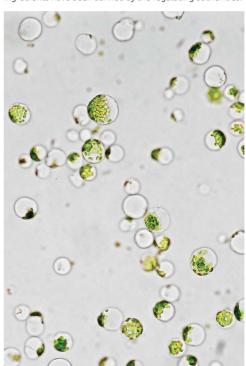


3.1. SUSTAINABLE INGREDIENTS

Good food starts with good ingredients. Good skincare is just the same. Raw-materials have an impact on both the skin and on the environment.

Natural ingredients provide better health and environmental safety

During the course of the 20th century many ingredients have been introduced into skincare products without sufficient safety assessments. In the past decades, scientific research indicates that many chemicals used in cosmetics have negative health impacts, and a large number of synthesised ingredients have been banned by the regulating authorities.



¹plant oils, plant extracts, waxes, butters, floral water and similar

Reduced contaminants

The manufacturing process of many synthetic raw-materials produces unwanted by-products and impurities, which can contaminate cosmetic products and pollute the environment. For example, the widely used polyethylene glycol production process can yield harmful contaminants such as 1,4-dioxane, which is a carcinogenic substance. Organic ingredients are free from by-products of chemical synthesis and the production process is considerably cleaner compared to ingredients synthesised from petrochemicals.

Free from pesticides

Unlike conventional agriculture, organic farming restricts the use of pesticides, chemical fertilisers and growth enhancers. Intensive industrial agriculture often compromises environmental sustainability - polluting soil and water with residues of agrochemicals and endangering the biodiversity of species. Non-organic agro-ingredients may also have a negative influence on human health as they may contain the residues of agricultural chemicals in the final product. It is well known that most of the fertilisers and pesticides efficiently penetrate through the epidermis (skin), indicating their ability to systemically influence human health. Even in low concentrations there is a cumulative effect of agrochemicals on the human body. Many of them have been proven to have an effect on the endocrine system. To minimise health and environmental risks associated with intensive industrial agriculture, 96% of MÁDARA plant ingredients¹ are sourced from organic farming.

Precautionary principle

In accordance with ECOCERT/COSMOS standards MÁDARA follows the precautionary route when there is scientific evidence that an ingredient, technology or process could pose a health or environmental risk: it is not included in the formulation or manufacturing. For this reason, genetically modified organisms (GMOs) are not used in MÁDARA formulations. Irradiation of raw materials with Gamma and X-ray irradiation are forbidden.

ENVIRONMENTAL SUSTAINABILITY

MICROPLASTICS FREE

You can't see it therefore it's not bothering you? Wrong! So small you can't see it with your eye, yet so disastrous it can create a pollution catastrophe with the potential of destroying marine life. Microplastics are plastic pieces smaller than 5 mm that easily pass through water filtration systems and end up in the seas and lakes. They can enter the waters as primary microplastics, like beads from personal care products or microfibres from clothes, and secondary microplastics from larger plastic items that get broken into smaller pieces. The tiny size is one of the reasons why it's so harmful - it's impossible to clean it up at the beach and it's easily ingested by everything from zooplankton, the base of the marine food chain, to birds, fish, turtles and whales. It is estimated that over 90% of seabirds have pieces of plastic in their stomachs. Fish, marine mammals and seabirds are being injured and killed by plastic, and it is believed that 700 species could go extinct because of it. As the food chain continues, the harmful pollutant might even end up on your dinner plate.

This is one of the main worries of the cosmetics industry as microplastics are usually found in face exfoliators, toothpastes, shower gels and body scrubs. They were recently banned in Great Britain and some other countries but are still taking over most parts of the planet.

All of the cosmetic products made by MÁDARA are manufactured without the use of microbeads. Instead of that, we use natural exfoliating ingredients like volcanic sand that are not a threat to the environment.



Protection of endangered species

In accordance with ECOCERT/COSMOS standards MÁDARA uses only raw materials that respect the requirements of the Convention of International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Kind to animals

MÁDARA does not use raw materials extracted from living or slaughtered animals. The majority of MÁDARA products are vegan. For some products we use ingredients that are produced by animals but are not a part of the animal, for example beeswax, lanolin. In accordance with ECOCERT/COSMOS standards these ingredients have been obtained using strictly regulated processes and they do not entail the death of the animal concerned.

SUSTAINABILITY OF STEM CELLS

Science breathes in one rhythm and heartbeat with nature. Plant stem cells are the future of the beauty industry because of various SUSTAINABILITY and EFFICACY benefits. Learn 3 interesting reasons for why this is the best go-to technology for new skin inventions.





Promotes biodiversity

- > Nearly 1 in 5 plant species found on our planet is at risk of extinction.
- > Plant cell technology allows one to obtain active ingredients from plants without harvesting the actual plants or damaging their natural habitats.



Environmentally friendly

- > Plant stem cell = clean and sustainable technology.
- > Active ingredients are not only isolated from contaminants, such as microbes and pesticides, resources of land and water, which would be required by growing plant resources physically, are also saved.



Next-gen activity

> Applying high-stress conditions to plant cells (e.g. high UV exposure) accelerates even higher production of the desired skin-protecting molecules.





GROW <u>VOLUME</u> CONDITIONER

CHANTERELLE FUNGI, HOSPHOLIPIDS, NIACIN [B3], PANTOTHENIC ACID [B5]



Packaging sustainability has been an integral part of product design since the very first day of the Company. To minimise the direct and indirect environmental impacts of packaging during its life cycle, MÁDARA uses recyclable materials for packaging and integrates recycled materials wherever possible.



100% of our primary packaging (e.g. bottles, flacons) is made of recyclable materials (recyclable polymers or glass). In 2018, we continued to use post-consumer-recycled (PCR) plastics in the production of larger packaging volume items as shampoo and soap bottles. The amount of post-consumer-recycled plastics in packaging production has grown by 4% compared to 2017. Products that come in larger packaging volumes (such as 200 ml, 350 ml) are usually packaged in recycled plastic packaging, preventing tonnes of new plastics being created each year.



The secondary packaging (boxes) is manufactured from sustainably produced cardboard or paper. Wherever possible, boxes are not coated with a laminated layer, so as not to compromise biodegradability and recyclability.

The sustainability of both primary and secondary packaging is regulated and monitored by ECOCERT/COSMOS standards, which requires that packaging must be reviewed against the standard at least every three years to improve environmental sustainability.

PLANT-BASED PACKAGING

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One of the 2019 breakthroughs is an introduction of a plant-based packaging into the production. A bioplastic is plastic, which is either bio based, biodegradable or features both of these properties. It comes from sugar cane waste, created from the leftovers of sugar cane extraction, and spruce waste. On top of being a renewable source, plastic from sugar cane saves carbon dioxide rather than releases it.



ENVIRONMENTAL SUSTAINABILITY ENVIRONMENTAL SUSTAINABILITY





Transportation packaging

Our transportation packaging delivers products to the consumer in the most sustainable way.

The finished products are packaged in boxes containing 4-8 pieces (inner transportation boxes). The inner transportation boxes are further packaged in master cartons, which are shipped to the destination.

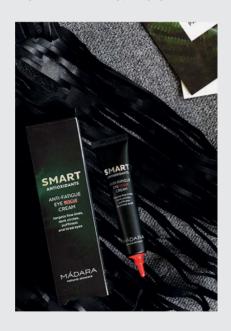
Starting from June 2017, the inner transportation boxes are sourced from 100% recycled material. The inner layers of master transportation boxes are made from recycled material (approximately 50% of total box weight); the outer layer, however, is made of new material to guarantee durability during shipping.

ECOCERT/COSMOS also specifies the list of allowed and forbidden packaging materials based on their recycling practices, environmental impact and other criteria.

- > Allowed materials in packaging: Wood, Glass, Aluminium, PE [Polyethylene], PET [Poly(ethylene terephthalate)], PP [Polypropylene], PETG [Poly(ethylene terephthalate) glycol], Paperboard, PLA [Polylactic acid] (non GMO), any other 100% natural materials.
- > Forbidden materials in packaging: polyvinyl chloride (PVC) and other chlorinated plastics, polystyrene and other plastics containing styrene materials or substances that contain, have been derived from, or manufactured, genetically modified organisms. It must be proven that these materials have not been used, for example by having written confirmation from the supplier.

SUSTAINABILITY INITIATIVE Banishing bubbles

A while ago, MÁDARA has banished bubble wrap used for product shipping. Instead we use special equipment that presses and shapes reclaimed paper or cardboard, so that it can be used as wrapping and shock-absorbing packaging material.



3.3. SUSTAINABLE MANUFACTURING

The production process and other processes and activities of MÁDARA can be described as low energy consuming. It is important to consume as little energy as possible both from an environmental and economic perspective. Therefore, we strictly monitor our energy consumption. MÁDARA's energy saving policy describes clear activities and responsibilities for every employee.

Our production process consists of modern state of the art equipment. Most of our machinery is manufactured by industry-leading engineering companies, which integrate the most efficient energy solutions.

GHG Emissions (E1*)

GHG emissions are significant determinants of climate change and global environmental health.

In 2018, CO₂ emissions amounted to 112.89 tonnes, as a result of the combustion of 59376 m³ of gas. Direct carbon emissions can be described as low. They are generated by the heating of the MÁDARA building on Zeltinu St., as well as steam generation for the production process.

Emissions Intensity (E2)

Carbon intensity helps to contextualise an organisation's overall efficiency — relative to revenues generated (economic return) and the performance of other companies. In 2018, CO2 intensity per 1 euro of turnover was 0.012 kg CO2. Although the production has increased, carbon intensity has decreased by 3 g per 1 euro of turnover and the company has fulfilled its goal to decrease the indicator value by 20%. The indicator is relatively low compared to average carbon intensity per dollar of GDP in EU. The lack of industry specific data makes further comparison difficult. We plan to reduce carbon intensity by 10% in 2019 by further optimising the production process. The increase in production amounts will not considerably increase emissions.

Energy Usage (E3)

This metric measures the total amount of energy consumed by the Company. Energy consumption is a major contributor to climate change, since the burning of non-renewable fuels generates greenhouse gases (GHGs) and causes other environmental impacts. Using energy more efficiently is essential in combating climate change.

In 2018, MÁDARA consumed 59378.52 m3 of gas, which amounts to 2031.87 GJ (gigajoules)**, including 33196.4 m³ of gas = 1922.61 GJ used for heating and 3193 m³ of gas = 109.26 GJ used for steam generation. An increase in gas consumption is attributable to a higher production level.





"Here and further in this document codes E1, E2 etc., S1, S2 etc., G1, G2 etc. refer to metrics outlined in the Nasdaq ESG REPORTING GUIDE 2.0 "*Conversion method recommended by the "Latvian Environment, Geology and Meteorology Centre": https://www.meteo.lv/lapas/vide/gaiss/gaisa-piesarnojums/metodologija-emisiju-gaisa-aprekansanai/metodologija-emisiju-gaisa-aprekansanai/da-102848.nid=516

ENVIRONMENTAL SUSTAINABILITY ENVIRONMENTAL SUSTAINABILITY

Energy Intensity (E4)

Energy intensity expresses the energy required per unit of activity, output, or any other organisation-specific metric. In 2018, MÁDARA's energy intensity was 1271 kJ (kilojoules) per 1 product manufactured, which is 94 kJ higher when compared to the estimate for 2017.

Energy Mix (E5)

The use of non-renewable fuels generates greenhouse gases (GHG) and causes other environmental impacts. Use of renewable energy sources is essential in combating climate change.

Our primary energy source is gas which is non-renewable, followed by electricity, which comes from renewable sources. Burning natural gas for energy results in fewer emissions of nearly all types of air pollutants and carbon dioxide (CO2) per unit of heat produced compared to coal or petroleum products. In fact, natural gas power plants produce no particulate matter (PM), ashes or slag that is an especially important factor in the urban environment. In 2018, MÁDARA consumed 59 379 m3 of gas, which is 2.3% higher compared to 2017. The increase is explained by the rapid production volume growth.

MÁDARA receives electricity from a centralised energy supplier's network. In the autumn of 2017, MÁDARA Cosmetics received the POWERED BY GREEN certificate and fully switched to 100% green energy produced in Latvia. In 2018, company used only 100% green, renewable energy, which is a 40pp increase in the renewable energy usage compared to 2017.



Water Usage (E7)

Clean waters are an essential part of environmental sustainability, therefore MÁDARA takes care to reduce wastewater pollution and optimise the consumption of water in the manufacturing process.

MÁDARA uses water for 3 main purposes:

- 1. Highly purified water as a product ingredient;
- 2. Water for manufacturing and cleansing/hygiene
- 3. Other water use (including offices).

Total amount of water consumed by the enterprise in 2018 is equivalent to 239 583 kWh.

The majority of the total water demand is used for manufacturing and cleansing/hygiene processes. MÁDARA mainly ensures the cleanliness of wastewater by using natural and easily biodegradable product ingredients and by having strict requirements for cleansing and disinfecting agents. With wastewater and rainwater pollution monitoring procedures in place, MÁDARA returns the water to the water cycle with the minimal level of pollutants, which can easily be handled by the municipality's cleansing systems.

○ ECO-FRIENDLY CLEANING AND HYGIENE

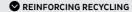
MÁDARA uses the following cleansing and disinfection agents: natural plant alcohol, natural plant based surfactants, iso-propyl alcohol, amphoteric surfactants, hydrogen peroxide. All cleansing and disinfection agents used must be verified by the ECOCERT/COSMOS auditing body.





Green delivery

MÀDARA understands that sustainable thinking should not be bound to the direct operations of the Company but should be more extensive. Hence, the Company puts effort to find the long-term partners who are committed to provide more sustainable services as well. The courier services we cooperate with are committed to reduce CO2 emissions by optimizing logistics, introducing green transportation vehicles and co-financing different green energy production initiatives.



To promote the practice of sorting and recycling among skincare consumers, MÁDARA accepts empty product packaging at our brand stores in Riga, offering a discount for every packaging item brought back to the store. The returned packaging is then sent to a recycling company Cemex, which later uses it as an ingrident for the production of clinker.

Waste generated in 2018:

Waste type	tonnes
Everyday waste (general waste generated by manufacturing and the office)	46.67
Paper and cardboard (packaging materials, office paper)	10.2
Plastic packaging (ingredient drums etc.)	4.78
Specific laboratory and production reaction waste	4.41

Waste Management

MÁDARA sorts cardboard, paper, plastic and other waste materials, sending them to specialised recycling companies, which ensure recycling of the materials whenever possible.

Sustainability initiative:

Another notable initiative of 2018 was the acquisition of a cardboard press machine. Not only does the factory surrounding look visually more appealing after the old 12 containers have been replaced by 1 cardboard disposal unit, the waste transportation now happens quarter as often. Hence, transportation is utilized more efficiently as well.



PART 4

SOCIAL RESPONSIBILITY

SKINCARE FOR HUMANITY



4.1. FOUNDATIONS OF SOCIAL RESPONSIBILITY

Social responsibility is an integral part of MÁDARA's values and purpose. Our social responsibility is based on four foundation pillars.

First, we work with organic and natural ingredients, delivering effective beauty solutions without compromising on health or the environmental safety of the raw materials, products or processes. Thus we help to minimise the health risks associated with increased exposure to consumer chemicals and help to limit environmental pollution, which influences larger groups of the population.

Second, respecting differences, promoting openness and equality is an integral part of our corporate mindset, business code of conduct and our communication with the public. There is gender diversity among MÁDARA employees and the board members, practically no gender pay gap, a lean organisation structure, open communication with consumers and the public, for instance the open factory.

OPEN FACTORY FOR EVERYONE

Openness and transparency are very important values at MÁDARA, therefore our factory is built with transparent production rooms and is open to the general public – consumers, community, children, students and other groups. During working hours the factory welcomes visitors: offering guided tours and workshops, creating a place where everyone can see and experience how organic and natural ingredients are being refined into luxurious cosmetic textures.

Third, the MÁDARA fair pricing principle defines that a product price shall reflect all true costs of product manufacturing, without transferring them to "third world" countries where they might compromise workplace safety, social welfare and the environmental future of local societies. All MÁDARA products are produced in our factory in Latvia in fair and safe working conditions. When choosing suppliers, priority is given to local suppliers. A major part of ingredients are sourced from organic farming, which can be described as more ethical and sustainable. There are more than 20 suppliers for MÁDARA products' packaging, where two thirds of the suppliers are located in EU countries.

Fourth, we recognise that issues in society arising from inequality and discrimination are complex and widespread, therefore MÁDARA collaborates with organisations and experts that work to make our society safer and better. For instance, MÁDARA is a continuous contributor to the Latvian NGO MARTA Centre, MAR-TA Centre works with issues of human trafficking and domestic violence on multiple levels - initiating systematic and legislative improvements, organising preventive educational work with school-age children as well as providing free of charge legal, psychological and other services to victims of domestic violence and human trafficking. MARTA Centre also works with partner organisations in Finland, Turkey and countries in Central Asia, transferring best practices and initiating positive improvements in gender equality, domestic safety, and the prevention of trafficking.





MÁDARA × MARTA × YOU 2018



20'000 €

otal donation amount



5000€

regular support team sessions for Latvian children and youth



5000 €

Ionation for the social

NO TO VIOLENCE AGAINST CHILDREN



33 go thro

go through experience that they should not

child neglect
physical violence

emotional violence

NO TO VIOLENCE AGAINST WOMEN



1 IN 3 WOMEN

in the EU during their lives have suffered from physical, sexual or emotional violence



During the year we have helped around

143 CHILDREN

500 CONSULTATIONS FOR

#METOO / #ESARĪ

Help from lawyers and psychologists



45 CHILDREN
IN REGULAR
SUPPORT GROUPS



35

THAT IS 10 CONSULTATIONS PER WEEK



1 SUMMER CAMP

to strengthen nonviolent communication between youth

OUR COLLECTIVE
NO TO BROKEN LIVES



4.2. EQUALITY AND HUMANITY

The core purpose of MÁDARA is linked to the powerful concept of benefiting humanity and equality. We live and promote the values of humanity and equality throughout: producing safe and sustainable products, devising safe and natural beauty solutions, creating safe and fair working conditions, sustainable supply chain, opening up our factory to the general public, pursuing a transparent and ethical business practice. Every morning we wake up and come to work to create a better world – product by product, process by process, innovation by innovation.

Non-discrimination (S6)

Madara Cosmetics (the Company) aims at fostering respect and equality within the society members. It is a diverse and international community that is related to the Company. Individuals of different cultures, values, national origin, race, colour, gender, marital status, sexual orientation, political opinion are a part of our community. There are two pillars of non-discrimination concept that the Company adheres to: respect and social inclusion.

Respect – The Company members share a mutual respect in their interactions and encounters. We abide by cultural norms and laws dictated by the markets where we are present. Even if the personal beliefs and viewpoints do not correspond, it is of our responsibility to embrace the viewpoint of others with grace and understanding.

Social inclusion – People of different viewpoints and backgrounds are welcomed in our company. Bias, prejudice and racism have no place in our company and community. We urge our employees to treat clients, partners and fellow employees in the same way regardless of their socio-economic status, national origin, gender, or sexual orientation,

Human Rights (S10)

Respect for human rights is at the core of Madara Cosmetics (the Company). The business at the Company is conducted in a manner that respects the rights of all parties involved, complying with all legal requirements. This policy applies to every employee of the Company and is built on the following commitments:

<u>Diversity and inclusion</u> – We value the diversity of the employees at the Company. Discrimination of any sort is discouraged and forbidden (see more in Non-discrimination

policy). We do not tolerate disrespectful or inappropriate behaviour, unfair treatment. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

<u>Freedom of Collective bargaining</u> – We do not restrict our employees from joining labour unions.

<u>Safety of the workforce</u> – We aspire to provide an injury-free and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. Together with employees, we are constantly improving the safety measures in our company by identifying the risks and educating our employees.

Forced and Child Labour – Forced labour, including prison labour, indentured labour and any forms of slavery are forbidden in the Company. Employment in our company is possible only on the voluntary grounds under no threat of penalty or sanction. In addition, children under 18 years are not allowed to be hired for work in hazardous positions. We also make the terms and conditions of employment available to all employees before their employment is started.

<u>Work Hours, Salaries and Benefits</u> – Employees of our company receive competitive wages relative to the industry and specifics of the local labour market. We comply with applicable wage, work and overtime hours and benefits laws.

SOCIAL RESPONSIBILITY SOCIAL RESPONSIBILITY

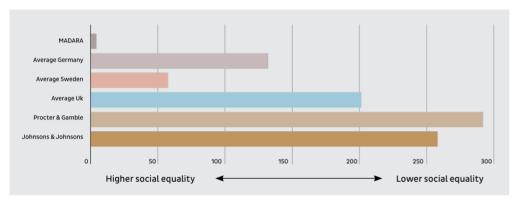
4.3. EQUALITY IN FIGURES

CEO Pav Ratio (S1)

This ratio illustrates the company's costs for the Chief Executive as compared to average employee costs. Reporting on remuneration can show an organisation's

commitment to improving social equality. The lower the CEO pay ratio, the smaller the CEO-employee pay gap and higher social equality. CEO Pay Ratio MÁDARA Cosmetics: 1.67 to 1.

CEO Pay Ratio



Gender Pay Ratio (S2)

Gender Pay Ratio measures the remunerative scope and impact of the gender pay gap within the company. Ratio: Median Male Salary to Median Female Salary. The gender pay gap reflects ongoing discrimination and inequalities in the labour market which, in practice, mainly affect women. The average gender pay gap in the EU is 16%, while women in managerial positions in the EU on average earn 23% less than men. With a gender pay ratio of 1.03, remuneration distribution in MÁDARA is more equal compared to the EU index. Contrary to the EU statistics, women in MÁDARA managerial roles earn roughly 3% more than men. The gap in MÀDARA is explained by the job specifics and reflects the situation in the job market. Globally, some higher paying industries have naturally formed with more male representatives, other with female. In MADARA, in some cases more men happened to work in higher-paying fields but there is no gender discrimination within the scope of the same position in MÀDARA.

Executive positions MÁDARA -

0.73 women earn more than men

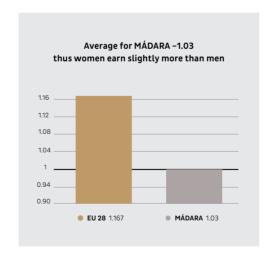
Manager positions MÁDARA -

0.97 women earn slightly more than men



https://www.bloomberg.com/graphics/ceo-pay-ratio/

http://www.bbc.com/capital/story/20190108-how-long-it-takes-a-ceo-to-earn-more-than-you-do-in-a-year https://ec.europa.eu/info/sites/info/files/aid_development_cooperation_fundamental_rights/annual_report_ge_2019_en.pdf



Specialist positions MÁDARA -

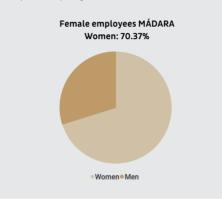
1.34 men earn slightly more than women

MÁDARA production and warehouse employees -

1.09 men earn more than women

Gender Diversity (S4)

The percentage of female full-time employees; this ratio can indicate risks related to workplace inequality.



Employee Turnover (S3)

The relative percentage of employees who leave the organisation voluntarily or due to dismissal, retirement, or death in service. A high rate of employee turnover can indicate levels of uncertainty and dissatisfaction among employees, or may signal a fundamental change in the structure of the organisation's core operations. Turnover has direct cost and value implications either in terms of reduced payroll or greater expenses for the recruitment of

MÀDARA Employee Turnover Ratio in 2018 stood at 4.23%, which is 1.9pp higher compared to 2017 but is still relatively low.

Human Rights (S10)

The number of grievances or judgments regarding human rights impacts during the reporting period - 0

Please refer to the Corporate Governance section for more information

Temporary Worker Ratio (S5)

This ratio offers an indication of job stability and the level of benefits the organisation offers. Percentage of Full-Time Positions held by Part-Time/ Contract/Temp Workers. With 93.1% of the workforce on full-time contracts. MÁDARA contributes to the social stability and security of employees. In fact, the share of fulltime employees has risen by more than 6pp compared to the previous year.

Temporary Worker Ratio MÁDARA



- Part-time employees 6.9%
- Full time employees 93.1%

The proportion of full-time MADARA employees has increased by 6.35pp in comparison with 2017.

SOCIAL RESPONSIBILITY SOCIAL RESPONSIBILITY

4.4. HEALTH & SAFETY AT MÁDARA

Creating a safe working environment and caring for the health of our employees is one of the main focuses of human resource management at MÁDARA.



Safety of the workforce:

- > There is a risk assessment for each job position of the company. Based on these risks a personalised instruction is created in order to define the equipment standards and protection tools if needed (e.g. specialised shoes, helmet etc.). MÁDARA provides employees with all of the protection tools needed and organises regular checks of how employees comply with the health and safety policy.
- > Each employee has been informed about the health and safety policy and trained before he/she commences work.
- > MÁDARA organises centralised health and safety training once a quarter.
- > Special permits.

Health and safety of the workforce is regulated by the legislation of the Republic of Latvia; MÁDARA respects all regulations and norms and has implemented a health and safety policy.

There is a special position at MÁDARA called a Safety Officer, which has responsibility for ensuring that both the employer and employees comply with safety legislation as well as that the health and safety policies are adhered to.

MÁDARA has entered into a contract with a health and safety advisory and training company to ensure double control of all issues related to health and safety.



In the case of work in increased risk areas or work with specialised equipment (e.g. warehouse loader), special training is organised. Only those employees who have been trained and have obtained a special permit can work with specialised equipment or work in increased risk areas. Additionally, to ensure the safety of the employees and company visitors, walking areas in the factory and warehouse have been marked with a safety ribbon.

Fire safety

- > There are fire evacuation plans in the MÁDARA building at 131 Zeltinu Street, Marupe, Latvia.
- > Each employee has been informed about fire safety and undergone training before the commencement of work.
- > MÁDARA organises a centralised fire evacuation exercise once per year.

Health of the workforce

Mandatory Health Examinations are organised by MÁDARA once per year in order to guarantee each employee easy access to doctors as well as ensure that all employees fulfil the mandatory health examination.

MÁDARA also offers employees health insurance that covers the costs of medical services according to the insurance programme.

Injury Rate (S7)

Total number of injuries and fatalities relative to the total workforce: 0

Low injury and absentee rates are generally linked to positive trends in staff morale and productivity.





Green thinking

With the support of Green Dot, an educational seminar about waste sorting and recycling has been organized for the Company's employees. This was a great opportunity to learn more about sorting, recycling and to learn the truth about some popular myths. In additional, all rubbish bins in the Company's headquarters have been replaced by the sorting containers.



PART 5

CORPORATE GOVERNANCE

CORPORATE GOVERNANCE CORPORATE GOVERNANCE

Board - Board diversity (G1)

The Company has a two-tier management structure comprising of the Management Board and the Supervisory Board. While the Management Board has responsibility for everyday management, the Supervisory Board represents shareholder interests in General Meetings and oversees the activities of the Management Board.

MANAGEMENT BOARD

Name	Function	Involved in executive activities of the company
Ms Lote Tisenkopfa Iltnere	Chairman	YES
Mr Uldis Iltners	Member of the Board	YES
Ms Paula Tisenkopfa	Member of the Board	YES



Lotte Tisenkopfa-Iltnere

Ms Tisenkopfa-Iltnere, born in 1982, is the Chairman of the Company's Management Board, currently substituted by Acting Chairman Mr Uldis Iltners, while on maternity leave. Ms Tisenkopfa-Iltnere graduated from the University of Latvia in 2005 with a bachelor's degree in Asian studies, where she mastered Asian culture, business and

the Japanese language. Co-founded the Group in 2006. In 2009 Ms Tisenkopfa-Iltnere completed the Swedish Institute Management programme of leadership and corporate social responsibility practices. Since 2016, has worked as a volunteer for MARTA Centre, an NGO that works with issues relating to victims of domestic violence and human trafficking. Apart from her volunteer work, she does not hold any positions or perform any activities outside the Group that are significant with respect to the Group.



Uldis Iltners

Mr Iltners, born in 1983, is a member of the Company's Management Board and the Acting Chairman of the Managing Board while Ms Tisenkopfa-Iltnere, the wife of Mr Iltners, is on maternity leave. He is the Chief Executive Officer of the Group. Mr Iltners graduated from the BA School of Business and Finance in 2003 with a

bachelor's degree in business management and leadership. Before co-founding the Group in 2006, he worked as a private entrepreneur, for instance as CEO and analyst at an IT consulting service providing computer simulation assisted production controlling and optimisation for manufacturing companies. He does not hold any positions or perform any activities outside the Group that are significant with respect to the Group.



Paula Tisenkopfa

Ms Tisenkopfa, born in 1988, is a member of the Company's Management Board.
Ms Tisenkopfa continues her studies in the University of Latvia, bachelor's programme of philosophy.
Co-founded the Group in 2006 and since then she has been actively involved in sales and export expansion, as well as product and brand

development. Currently Ms Tisenkopfa is the deputy director, whose main areas are human resources and cooperate governance matters. She does not hold any positions or perform any activities outside the Group that are significant with respect to the Group.

Board Independence (G2)

The Management Board has the duty to submit a report on the activities and financial position of the Company that is open to the public once every 6 months. The report shall include the financial performance of the Company for the past 6 months as well as describe the recent outcomes of Management board activities and outline future strategies for development.

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SUPERVISORY BOARD

Name	Function	Time period	Involved in executive activities of the company
Zane Tamane	Chairman of the Council	24.08.2017-present	No
Liene Drāzniece	Deputy Chairman of the Council	11.01.2017-22.05.2018	No
	Member of the Council	28.05.2019 - present	No
Anna Ramata Stunda	Member of the Council	24.08.2017-present	No
Anna Andersone	Member of the Council	24.08.2017-present	No
Solvita Kurtiša	Member of the Council	24.08.2017-15.01.2019	No
Anu Pauliina Koskinen	Member of the Council	22.05.2018-present	No



Zane Tamane

After graduating from the Stockholm School of Economics in Riga, Ms Tamane has pursued a brand strategist career in 2 international advertising agencies – McCann and Lowe. Having a deep insight into brand strategy and interest in creating meaningful content, Ms Tamane is

strong about cultivating a passion for eco-products across the globe.



Anu Pauliina Koskinen

Anu has kickstarted her career as a Product Specialist in Procter & Gamble, later joining L'Oréal and climbing the career ladder up to the Luxury Brand Sales Director and Marketing Manager positions. In recent years, Ms Koskinen has worked as a Skincare Business Director in LUMENE. From

2016, she has been the Director of the Cosmetics Division at Oy Transmeri Ab.



Anna Ramata-Stunda

Since 2010, Ms Ramata-Stunda has worked as a researcher and in 2016 also became a lecturer at the University of Latvia. Currently Anna is a PhD Candidate in Biotechnology at the University of Latvia, a member of the Latvian Association of Microbiologist and a co-founder of two biotech-

nology companies - SIA InCell and SIA Alternative Plants. A number of scientific publications and cutting-edge patents in biotech are also on her list.



Anna Andersone

Ms Andersone, a graduate of the Stockholm School of Economics in Riga, has worked as a Project Director and Strategist for the Baltic and international market. She has co-founded online-based service start-up companies "be-with", The Mill, Froont, "berta.me". Some of the management

positions that Anna holds include SIA HungryLab, NGO TechHub Ria, SIA Hello World and others.



Liene Drazniece

Liene has received a degree in Visual Communication from the Latvian Academy of Art and later Design Direction specialization from the Instituto Marangoni Milano. Ms Drāzniece has spent years working as an art director for major Latvian brands. She is also the author of several brand iden-

tities for consumer goods and niche products.



Solvita Kurtiša

Ms Kurtiša holds a Master's degree in Economics from the Latvian University of Agriculture. She has worked as a Financial Director in AS Infrastructure Investments, later joining management teams in SIA Brīvzemnieka nams, SIA Inin 7, SIA Priminvest and others.

CORPORATE GOVERNANCE

Incentivised Pay (G3)

Currently, the Management Board is not incentivised to execute a long-term ESG strategy. Nevertheless, it is a part of every employee's duties and day-to-day activities to work in accordance with the environmental, social and corporate governance guidelines stated in this report.

Collective Bargaining (G4)

The employees of the Company are not part of any collective organisations of workers, but the policy of the Company is to encourage employees to be open about how they see the Company could improve its everyday activities and thus the everyday work-life of its employees.

The Company ensures that both the physical and emotional work environment of the employees meets the requirements of Latvian legislation, promotes productivity and that each employee can fulfil their professional potential.

All employees are regularly instructed about fire safety and general work safety. In addition, with certain regularity everyone is required to perform a compulsory health check. All necessary protective clothing, equipment and tools are provided to the employees to perform their work in a safe and sustainable manner.

The employees are encouraged to express their opinion about various topics relevant to the Company as well as their overall satisfaction with their work. A survey is conducted annually and the results are summarised and presented to the executive team to discuss the necessary improvements. In addition, it is communicated to the employees that they can approach any of the members of the executive team in order to discuss both Company matters and their specific position in the Company.

The Company receives many applications for most of the positions, which indicates that the Company is a desirable work place. It was also named the 2nd most reputable company in Latvia, 2017.

In 2018, the number of employees has grown by roughly 24%. 25 new job positions have been established in 2018. Fair labour practices are applied in the hiring process, horizontal and vertical promotion process as well as everyday work-life, giving all of the employees the opportunity to fulfill their work targets.













CORPORATE GOVERNANCE

Supplier Code of Conduct (G5)

Madara Cosmetics (the Company) has a strong position with regard to its suppliers. We strive to ensure responsible supplier relationship by integrating environmental, social and ethical standards. The relationship is maintained via a constructive dialogue. The Supplier Code of Conduct (the Code) dictates the requirements for suppliers in terms of their responsible business conduct. At minimum, we expect that our suppliers comply with the national regulations and meet the requirements of the Code. The Company expects suppliers to follow the requirements listed below:

Labour and human rights

- 1. The supplier does not discriminate on the basis of national origin, race, colour, gender, sexual orientation, marital status, political opinion and disability.
- **2.** The supplier provides its employees with working conditions, hours, wages and leave in accordance with local regulations and industry.
- **3.** Personal information of employees is gathered and stored respecting employees right to privacy.
- **4.** The supplier prohibits forced labour practices including prison labour, indentured labour or any forms of slavery.
- 5. The supplier prohibits child labour practices in the company that could damage children's physical or mental health or prevents them from attending school.

Health and safety

1. The supplier ensures healthy and safe working conditions, takes preventive measures to minimize the risk of work-related accidents and injuries.

Environment

- **1.** The supplier complies with the local environmental law in a systematic manner.
- **2.** The supplier has a written environmental policy that is relevant to its type of operation and size.
- **3.** The supplier complies with Madara Cosmetics' environmental guidelines and requirements.

Business integrity and operations

- 1. The supplier complies with all applicable laws and regulations concerning bribery, corruption, fraud, intellectual property rights and competition.
- 2. The supplier provides a complaint mechanism for managers, workers and communities to report workplace complaints.
- **3.** The supplier acts according to written or verbal agreements and it has sufficient financial resources to deliver what is required.
- **4.** The supplier keeps the quality standard of the product/ service and minimizes the risk of a faulty product.
- **5.** The supplier ensures that the resources allocated for purchasing products/services are used efficiently and generate the most value.



6. The supplier seeks to ensure that everyday communication is clear and problem-solving is solution driven.

Ethics & Anti-Corruption (G6)

Every employee has been introduced to the values and inner culture of the Company and is expected to follow these guidelines. The values of humanity and equality embody respect, openness, friendliness and honesty among each other, which can also be considered as the ethical code of conduct of the Company. These values apply not only inside the Company, but also to outside communication and partnerships.

Introduction

This is the policy of MADARA Cosmetics (the Company) to comply with all applicable anti-bribery and anti-corruption laws. This Policy also exists to act as a source of information and guidance for those working for the Company. It helps employees recognize and deal with bribery and corruption issues, as well as understand their responsibilities. Bribery is defined as an act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also in breach of this policy.

The most prevalent forms of bribery and corruption stem from:

1. Payments to a company's employees or their relatives, or to a third party, to secure an advantage in business transactions.

CORPORATE GOVERNANCE

- **2.** Political contributions made to secure an advantage in business transactions.
- **3.** Charitable sponsorships used to secure an advantage in business transactions.
- **4.** Gifts, hospitality and expenses payments made to secure an advantage in business transactions.

Purpose

The sole purpose of this anti-bribery policy is to set out the responsibilities of the Company and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

Scope

This policy is applicable to employees, related personnel (spouse, children, etc.) of the Company and third parties acting on behalf of the Company and is valid to all business dealings and all jurisdictions where the Company operates.

How does one to identify a bribe?

When in doubt, the following questions can be asked:

- 1. am I being asked to pay something/provide any other benefit over and above the cost of the services being performed?
- **2.** am I being asked to make a payment for services to someone other than the service provider?
- **3.** are the hospitality or gifts I am giving or receiving reasonable and justified? Would I be embarrassed to disclose them?
- **4.** when a payment/other benefit is being offered or received, do I know or suspect it is to induce or reward favourable treatment, to undermine an impartial decision-making process or to persuade someone to do something that would be regarded the proper performance of their job?

Policy

The Company does not engage in bribery or corruption. It is contrary to the Company's policy for any employee or third party to request, offer, solicit, make or receive any payments or inducements which are illegal, unethical or represent a breach of trust. A bribe does not actually have to take place – just promising to give a bribe or agreeing to receive one is prohibited. The Company does not make direct or indirect contributions to political parties.

It is acceptable to receive gestures of hospitality and goodwill as long as the giving or receiving of gifts meets the following criteria:

- 1. It is not made with the intention of influencing the party to whom it is being given to obtain a business advantage.
- 2. It is not made with the suggestion that a return favour is expected.
- 3. It is in compliance with the local law.
- 4. It is given in the name of the company, not in an indi-

vidual's name

- 5. It does not include cash.
- **6.** It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- 7. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).

The Company does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. The Company will not make donations to support any political parties or candidates.

All employees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy. If any employee breaches this policy, they will face disciplinary action and could face termination for gross misconduct. The Company has the right to terminate any employee if they breach this anti-bribery policy. Compliance with this policy is mandatory for all employees. Failure to observe the terms of this policy may constitute a disciplinary offence, dismissal from employment and may expose individuals to civil or criminal proceedings.

Data Privacy (G7)

In 2018, MÅDARA has made certain actions to mitigate risks related to data privacy and ensure a GDPR compliance. Since the data security and privacy of customers, partners and employees is crucial to the sustainable company operation, with the help of external auditor, the company has revised and overlooked all the documents, procedures and practices to improve the data privacy standards in the company. MÅDARA operates under the legislation of the Latvian Republic and has adopted a data privacy policy that complies with the criteria dictated by the law.

External Assurance (G10)

The Company is audited by independent organisations, which check several of the criteria mentioned in the ESG report. One such organisation is ECOCERT, covering the audit for the sustainability of manufacturing practices and raw materials that are used in product manufacturing. Another organisation – Bureau Veritas Latvia SIA, performs auditing of all of the quality aspects of the product, including traceability, the manufacturing process and storage according to the ISO 22716:2007 standard.

The Financial Statements (including the consolidated financial statements of the Group for the financial years ended on 31 December 2016, 2017 and 2018) have been audited by Deloitte Audits Latvia SIA.





Period of reporting: January-December 2018 Published: August 2019