

## **Beauty Rebels AS | Transparency Act Statement 2024**

Beauty Rebels AS (“Beauty Rebels”) values responsible business practices and strives to uphold and promote fundamental human rights and labour rights in line with the UN’s Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.

The company has been subject to the Norwegian Transparency Act (Act relating to enterprises’ transparency and work on fundamental human rights and decent working conditions) since the financial year 2024. In line with the Act, the annual Transparency Act Statement provides information on how Beauty Rebels governs responsible business practices in own operations and supply chains. Furthermore, the statement highlights salient risks for adverse impacts on fundamental human rights and labour rights and provides information about measures to address these impacts. In addition, the statement discloses information on how the company address adverse impacts on the environment.

The Transparency Act Statement covers the fiscal year from 1 January 2024 to 31 December 2024.

### **1. General information**

*This section of the statement provides a general description of the company and area of operations as well as the commitments, guidelines and procedures that is implemented to handling actual and potential adverse impacts on fundamental human rights, labour rights, the environment and anti-bribery and corruption.*

#### **About Beauty Rebels**

Beauty Rebels is a cosmetics company based in Norway. Founded in 2022, the company specialize in product formulations, design, production, and regulatory services and offer a comprehensive range of solutions to bring beauty visions to life. Beauty Rebels is driven by innovation and serves as a strategic partner to a range of clients including retailers, brands and influencers.

The company develop beauty products such as skincare, haircare, make-up and beauty accessories. Brands includes Dr. Michael Zangani, Nude Beauty, HAAR Nordic Science, The Lab Performance, Chiron and Derma, which are sold in retailers such as Boots Apotek, Apotek 1, Vitusapotek, Vita, HM, Lyko, Cubus and NorgesGruppen. In 2024, Beauty Rebels had four fulltime employees, comprising a talented collective of cosmetics and retail experts.

For more information about the company, products and brands, please refer to [beautyrebels.no](https://beautyrebels.no).

#### **Commitment to responsible business practices**

Beauty Rebels is committed to upholding responsible business practices and to ensure sustainable and ethical business conduct across the value chain. The company aims to influence its suppliers and business partners towards ethical and sustainable production and responsible business practices.

Beauty Rebels is committed to the UN’s Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. These international instruments set

standards for areas such as human rights and labour rights and is integrated in the policies the company has implemented to govern responsible business conduct in own operations and the supply chains.

## **Governance**

The Board of Directors at Beauty Rebels has the ultimate responsibility for oversight of responsible business practices in the company.

The CEO is responsible for ensuring that Beauty Rebels comply with obligations and upholds responsible business practices in own operations and supply chains. This includes to make sure that the company carry out regular due diligence assessments regarding fundamental human rights, labour rights, environment and anti-bribery and corruption. Furthermore, the CEO is responsible for ensuring that necessary measures are implemented to address actual and potential adverse impacts on people and the environment.

All employees are responsible for upholding principles set out in policies and guidelines, promoting these to suppliers and business partners and conducting due diligence assessments when needed. Training of employees in responsible business conduct is provided regularly.

## **Policies and guidelines**

In line with the OECD Due Diligence Guidelines for Responsible Business Conduct the company has embed responsible business conduct in company polices and guidelines. The Beauty Rebels Code of Conduct ("the Code") promotes responsible labour practices and ethical behavior through principles that supports fundamental human rights, labour rights and responsible practices regarding environmental matters and anti-bribery and corruption.

The Code is based on the UN's Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. It applies to the company and employees as well as all suppliers and business partners, hereunder secondary suppliers and employees of the supplier/business partner. It also extends to consultants and others acting on behalf of the supplier/business partner.

The Code includes an explicit requirement for suppliers to conduct due diligence in their own operations and supply chain, in accordance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Areas that shall be assessed is human and labour rights, environmental impacts and corruption and bribery.

To address remedy, the Code highlights that the supplier has a duty to immediately report to the management in Beauty Rebels upon suspicion of any breaches of the principles laid out in the Code and that there shall be no retaliation against suppliers or employees of suppliers who report actual or potential concerns. Further, measures shall be in place to allow employees of suppliers and business partners to report concerns anonymously or through a designated representative.

The principles in the Code are well known to employees in Beauty Rebels and is communicated to suppliers and business partners regularly and before entering into an agreement. It is also available in English and Norwegian on [beautyrebels.no](http://beautyrebels.no). The Code is updated when needed in relation to how risks in the company's operations, supply chain and other business relationships emerge and evolve.

Other company policies include a supplier manual with terms related to product safety, use of substances and declaration of products. The supplier manual also states that the supplier/business partner shall be approved by an accredited certification body and follow guidelines set out by ISO 22716:2007 (Cosmetics — Good Manufacturing Practices), Social Compliance Standard: SEDEX (4 Pillar Semi Announced report), BSCI or other. Furthermore, the manual states terms relating to packaging, use of chemicals and a list of banned substances. It also highlights that the company does not accept any animal testing on finished products, nor ingredients.

All suppliers and business partners are requested to give its confirmation and acceptance of the terms in the Code, supplier manual and the company's general agreement, before the first order is placed by Beauty Rebels.

### **Due diligence processes**

Beauty Rebels is committed to conducting due diligence in accordance with the OECD Guidelines for Multinational Enterprises on a regularly basis. This includes due diligence assessment of all suppliers and products annually, or more often if needed e.g., when entering into new countries/regions or when developing new products. Furthermore, pre-qualification process for suppliers and other business relationships is conducted before entering into business agreements.

The due diligence processes assess areas such as fundamental human rights, labour rights, environmental impact and risk of corruption and bribery. Areas of focus in due diligence assessments and the pre-qualification process is risk of child labour and forced labour and working conditions such as secure employment, working time, adequate wage, social dialogue, freedom of association collective bargaining, work-life balance and health and safety. Other areas of focus are gender equality and equal pay for work of equal value, training and skills development, employment and inclusion of persons with disabilities and measures against violence and harassment in the workplace. In addition, areas relating to consumer interests such as product safety and use of substances are assessed as part of the pre-qualification process. In addition to social matters, environmental aspects and anti-corruption and bribery are also considered, and the company plan to strengthen these areas in due diligence process going forward.

The company assesses risk areas in relation to the location of the supplier as well as product related risk. This includes, if possible, an assessment of risk related to raw materials and input factors used in products. In addition, and as stated in the Beauty Rebels Code of Conduct, the first-tier supplier/business partner is responsible for conducting due diligence in accordance with the OECD Guidelines for Multinational Enterprises in their supply chains. The supplier/business partner is also expected to follow international instruments such as UN's Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises and promote these in its agreements with secondary suppliers.

To prioritize the due diligence processes, Beauty Rebels uses a risk-based approach when conducting due diligence assessments. In line with the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the OECD Due Diligence Guidance for Responsible Business Conduct, due diligence is prioritized according to the following factors:

- Size of business
- Nature of operations

- Context of operation
- Risks of human rights violations in country of operations/supplier
- Severity and probability of impact
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## **2. Actual adverse impacts and significant risks of adverse impacts**

*This section of the statement highlights the actual adverse impacts and significant risks of adverse impacts on fundamental human rights, labour rights and the environment as identified in due diligence processes.*

### **Risk of adverse impacts on fundamental human rights and labour rights**

As part of the due diligence process, Beauty Rebels identifies salient risks related to actual and potential adverse impacts on fundamental human rights and labour rights. The company has assessed the risk to be low in its own operations but inherent in the supply chains.

Salient human rights risk for workers in the supply chains include:

- Discrimination and harassment
- Freedom of association and collective bargaining
- Access to information and participation in dialogue
- Decent working conditions
- Health and safety

The company approaches assessment of salient risks for adverse impacts on fundamental human rights and labour rights by assessing both location of first tier suppliers and risks related to products:

#### ***Salient location risks***

Beauty Rebels is dependent on global and complex supply chains and the company has approximately 20 first-tier suppliers. These suppliers are located in Norway, Sweden, Finland, Germany, Poland, UK, Turkey, China and South Korea. 90 percent of the first-tier suppliers are located in Europe (including Türkiye) and 10 percent in Asia.

Beauty Rebels source products from countries with significant risks of actual and potential adverse impact on human and labor rights. This applies particularly to China and Türkiye where there is inherent risk related to areas such as suppression of freedom of association, health and safety in the workplace, discrimination, working hours and wages.

The company has no knowledge of actual adverse impacts in the reporting year and has no indication that its suppliers and business partners in these countries is violating fundamental human rights and labour rights, or other principles set out in the Beauty Rebels Code of Conduct or other company policies. The risk has therefore been assessed as inherent for the time being and the company governs the relationships with suppliers based on the precautionary principle. This includes measures such as conducting due diligence assessments regularly, pre-qualification process ahead of entering business agreements as well as communicating guidelines and expectations to first-tier suppliers and business partners regularly.

### ***Salient product risk***

Beauty Rebels develop beauty products such as skincare, haircare, make-up and beauty accessories. Certain products such as electronics and accessories may consist of raw materials and input factors which is related to risk of adverse impacts. This applies particularly to electronic products that contain different metals and minerals where extraction and production processes may carry inherent risk related to areas such as health and safety and forced labour. Accessories made of textile consists of raw material such as cotton which may be exposed of risks such as forced labour, child labour, discrimination and freedom of association.

The company has no knowledge of actual adverse impacts in the reporting year and has no indication that its suppliers and business partners related to risk products is violating fundamental human rights and labour rights, or other principles set out in the Beauty Rebels Code of Conduct or other company policies. The risk has therefore been assessed as inherent for the time being and the company governs the relationships with suppliers based on the precautionary principle. This includes measures such as conducting due diligence assessments regularly, pre-qualification process ahead of entering business agreements as well as communicating guidelines and expectations to first-tier suppliers and business partners regularly.

### **Risks of adverse impacts on the environment**

As part of the due diligence process, Beauty Rebels assess salient risks related to adverse impact on the environment. In the reporting year, environmental impact is considered to be low in own operations but more significant in the supply chains.

Adverse environmental impacts include greenhouse gas emissions and pollution in the supply chain, where activities such as extraction, production and transportation are assessed as having the most adverse impact. Resource use is also assessed to have a negative impact, with raw materials and packaging being the most salient. This also includes waste handling throughout the value chain, including waste handling by consumers after use of products.

The company governs the impact in the supply chains through measures such as due diligence assessments and pre-qualification process ahead of business agreements as well as communicating guidelines and expectations to suppliers and business partners regularly. In 2024, the Code of Conduct and supplier manual includes some requirements related to environmental impacts, and the company will strengthen these requirements if needed going forward.

## **3. Measures to cease and mitigate significant risks of adverse impacts**

*This section of the statement highlights measures Beauty Rebels has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts.*

- Implemented a Code of Conduct based on the UN's Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.
- Implemented a supplier manual that include terms related to product safety, use of substances, declaration of products, packaging and animal welfare.

- Conducts due diligence in accordance with the OECD Guidelines for Multinational Enterprises on a regularly basis. This includes due diligence assessment of all suppliers and products annually, or more often if needed e.g., when entering new countries/regions or when developing new products.
- Conducts a pre-qualification process for suppliers and other business relationships before entering into business agreements.
- Regular assessments, follow-up and collaboration with suppliers and business partners when needed, including matters such as fundamental human rights, labour rights and impacts on the environment.
- Requires all suppliers and business partners to be approved by an accredited certification body and follow guidelines set out by ISO 22716:2007 (Cosmetics — Good Manufacturing Practices), Social Compliance Standard: SEDEX (4 Pillar Semi Announced report), BSCI or other.
- Encourage suppliers to use certifications and standards such as ISO 45001 (Occupational Health and Safety Management) and Fairtrade to protect workers and ensure fair treatment and sustainable practices.

Additional environmental measures include:

- Encourage suppliers to pay attention to the use of plastic and unnecessary packaging, aiming for as little waste as possible. Use of recycled plastic is emphasized.
- Encourage suppliers to implement certifications such as Blue Sign and Global Organic Textile Standard (GOTS) for products containing textiles.
- Encourage suppliers to be certified by ISO 14001 (Environmental Management) which demonstrates commitment to environmental sustainability in operations.
- Implemented a company policy that highlights that fossil free transportation shall be chosen when possible (transportation ordered by the company)

Beauty Rebels acknowledges the lack of transparency in the supply chains beyond first tier suppliers as an inherent challenge that impacts the due diligence process at the time being. The company aims to strengthen its processes going forward and will work towards getting more insight and knowledge about actual and potential adverse impacts related to secondary suppliers as well as raw materials and input factor used in products.

The Beauty Rebels Code of Conduct is available on [beautyrebels.no](http://beautyrebels.no). For more information or questions related to the company's work on responsible business practices, please contact [info@beautyrebels.no](mailto:info@beautyrebels.no).

Signatures:

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