AHAVA

23/09/2025

Formal Statement of AHAVA Dead Sea Laboratories Ltd
In Response to Notification of Inclusion in the OHCHR Database of Business Enterprises Involved in Certain Listed Activities

Executive Summary

AHAVA Dead Sea Laboratories Ltd. ("**the Company**") respectfully submits this statement in response to the notification of its inclusion in the forthcoming update of the Office of the High Commissioner for Human Rights ("OHCHR") database of business enterprises alleged to be involved in certain listed activities relating to the State of Israel's presence in the West Bank.

The Company wishes to place on record, in a constructive yet unequivocal manner, that such inclusion is **misplaced, inaccurate, and unjustified**. It disregards both the Company's current operational reality and the fundamental principles of international law.

Since 2022, the Company's **entire production chain has been located at Kibbutz Ein Gedi, within the sovereign and internationally recognized territory of the State of Israel.** Additionally, the Company **does not and has never extracted resources from occupied territory**.

This relocation has also been independently acknowledged: in November 2024, the Israeli NGO 'Who Profits' confirmed that AHAVA was removed from its database of companies active in the West Bank, following verification of the Company's relocation."

The inclusion of AHAVA in the OHCHR database threatens to undermine a **longstanding, positive, and inclusive relationship** between the Company and its diverse workforce—comprised of all branches of the Israeli society: Druze, Bedouins, Christians, Muslims, Russians—as well as Palestinians, who have built a shared professional community based on respect, dignity, and mutual benefit.

This statement provides a comprehensive account of the Company's actions, legal compliance, and ethical commitments. It also addresses and rebuts longstanding mischaracterizations by political campaigns and NGOs. The Company respectfully requests that OHCHR **remove AHAVA Dead Sea Laboratories from the database** and refrain from perpetuating inaccuracies that harm both the enterprise and its employees.

Introduction and Context

AHAVA Dead Sea Laboratories was founded in 1988 with the mission of creating scientifically advanced skincare products utilizing the natural properties of minerals from the Dead Sea. Over three decades, the Company has grown into an internationally recognized brand, exporting to more than 30 countries and collaborating with scientific institutions worldwide.

The Company recognizes that its earlier operations in Mitzpe Shalem, a site situated in the West Bank, have been the subject of extensive debate and criticism. While these activities were conducted pursuant to licenses granted by Israeli authorities and in accordance with domestic law, the Company acknowledges that perceptions under international law and international politics created a climate of controversy.

In response to these concerns—and in line with its commitment to lawful and ethical conduct—combined with its need for more modern and larger facilities the Company undertook a comprehensive relocation process. In 2022, the new state-of-the-art facility at Kibbutz Ein Gedi was inaugurated, thereby ensuring that all operations are conducted solely within the State of Israel's recognized borders.

Relocation and Compliance with International Law

By 2020, the Company reduced activity at the site to a minimum. By 2022, all production was consolidated at Ein Gedi.

This relocation satisfies both the **letter and spirit of international legal requirements**, particularly those deriving from:

- **The Fourth Geneva Convention (1949), Articles 49 and 55**, which prohibit an occupying power from transferring its population into occupied territory and from exploiting natural resources for the benefit of its own economy.
- **The Hague Regulations (1907), Article 55**, which obligates the occupying power to administer resources as usufructuary rather than as proprietor.

By ensuring that all minerals and mud used in production are sourced **only from the Israeli side of the Dead Sea**, the Company is fully aligned with these provisions.

Any continued inclusion of the Company in the OHCHR database, despite this relocation, would therefore constitute a **failure to acknowledge compliance** and would unjustly penalize a business enterprise that has demonstrated good faith engagement.

Resource Sourcing: Exclusively from Israeli Territory

The Company wishes to make abundantly clear that:

1. **All Dead Sea mud and minerals used by AHAVA are now and have always been extracted from within Israeli territory.**
2. The Company holds licenses and permits exclusively for extraction on the Israeli-controlled shore.
3. No excavation, transport, or use of resources occurs from any part of the West Bank.

Allegations of "pillage" or misappropriation of Palestinian natural resources are therefore wholly **inapplicable to the Company's present conduct.**

Furthermore, under international law, pillage requires both unlawful appropriation and intent to permanently deprive. Neither element applies to AHAVA's current operations.

Employment and Labor Practices

AHAVA's workforce is one of the most **diverse and inclusive in Israel's economy**. Its employees include:

- **Druze communities** from the Galilee and the Carmel region.
- **Bedouin workers** from the Negev.
- **Christian employees** from Nazareth, Jerusalem and Arad.
- **Russian-speaking immigrants** from the Former Soviet Union.
- **Israeli Jews** from various regions.
- **Palestinians**, including residents of East Jerusalem and Jericho, who contribute meaningfully to the Company's operations.

This diversity reflects not only the demographic mosaic of the region but also the Company's commitment to equal opportunity and non-discrimination.

The OHCHR's listing process, by branding the Company as complicit in wrongdoing, **undermines this harmonious and mutually beneficial environment.** It sends an unfortunate message that collaboration between communities across ethnic, religious, and political lines is suspect, when in fact it should be encouraged as a pathway toward coexistence.

Corporate Social Responsibility and Community Impact

The Company invests significantly in community development, scientific collaboration, and environmental protection:

- **Community Engagement:** AHAVA has long supported local schools, cultural programs, and healthcare initiatives in Israel.
- **Scientific Research:** Collaborations with universities in Israel and abroad advance dermatological and ecological science.
- **Environmental Stewardship:** Sustainable extraction practices and investments in ecological preservation ensure that Dead Sea resources are managed responsibly.

Such contributions should not be disregarded in favor of one-dimensional narratives promoted by adversarial NGOs.

Rebuttal of Mischaracterizations and NGO Claims

Over the past decade, various political campaigns—most notably within the framework of the Boycott, Divestment, and Sanctions (BDS) movement—have mischaracterized the Company as a symbol of settlement profiteering.

It must be emphasized that:

- The Company's **marketing practices** transparently identify its Israeli location.
- The Company has **ceased all its manufacturing in settlements** since 2022.
- Allegations of ongoing pillage are **factually incorrect**.

The OHCHR's reliance on outdated or politically motivated claims undermines the impartiality of its mandate.

Importantly, even critical civil society monitors have recognized the Company's relocation and cessation of any operations in the West Bank. For example, the Israeli NGO "Who Profits" – known for its rigorous monitoring of corporate involvement in the occupied territories – formally confirmed in November 2024 that it removed AHAVA Dead Sea Laboratories from its database of enterprises active in the West Bank, following the Company's declaration and verification of its relocation inside Israel's internationally recognized territory. This independent confirmation underscores the factual accuracy of AHAVA's present operations and further invalidates the basis for its continued inclusion in the OHCHR database (see Annex I, including the original Hebrew letter and a free English translation).

Constructive Engagement with International Institutions

The Company has consistently demonstrated a willingness to engage constructively with international bodies:

- By relocating its manufacturing operations at significant expense, it directly addressed concerns raised by UN officials and NGOs.
- By adopting transparent sourcing policies, it aligned with OECD guidelines on responsible business conduct.
- By maintaining an inclusive workforce, it contributes to peacebuilding and social cohesion.

The inclusion of the Company in the OHCHR database, despite these demonstrable steps, risks discouraging enterprises from engaging in good faith.

Conclusion and Formal Request for Removal
In light of the facts presented, AHAVA Dead Sea Laboratories Ltd. formally submits that its inclusion in the OHCHR database is:

- **Factually inaccurate,** as the Company no longer manufactures in settlements nor exploits occupied resources.
- **Legally unsound,** as allegations of pillage or unlawful exploitation do not apply under current circumstances.
- **Ethically counterproductive,** as it undermines the Company's inclusive labor practices and constructive community contributions.

Accordingly, the Company respectfully requests that OHCHR:

1. **Remove AHAVA Dead Sea Laboratories from the database** in its forthcoming update.
2. **Acknowledge the Company's compliance measures** in relocating operations and sourcing exclusively within Israel.
3. **Refrain from perpetuating reputational harm** through reliance on outdated or politically motivated allegations.

The Company remains committed to engaging transparently and constructively with OHCHR and other international institutions, but it must insist on fair, accurate, and lawful treatment. In line with this, we would happily host any UN officials you deem relevant to visit us and our operations to ascertain the facts.

Respectfully submitted,

AHAVA Dead Sea Laboratories Ltd
September 2025

Annex I

Correspondence from 'Who Profits' (25 November 2024), including the original Hebrew letter and a free English translation.

"Subject: Your Letter Dated October 21, 2024, on Behalf of "Ahava Dead Sea Laboratories Ltd."
Our Client: "Who Profits" (R.A.)

AHAVA

Reference: Your letter dated May 8, 2024; our letter dated June 6, 2024; your letter dated October 21, 2024

Dear Sir/Madam,

1. Further to the correspondence and the conversation between the undersigned, [redacted] and [redacted].

2. Based on your declaration on behalf of your client, as stated in your most recent letter referenced above, we hereby inform you that our client has removed the profile of "Ahava Dead Sea Laboratories Ltd." from the database of companies currently (at present) active in the West Bank, as displayed on its website.

3. As stated in our previous letters, our client does not delete or modify reports it has published in the past, and it is self-evident that all content within them reflects the situation as of the date of publication. However, as a gesture of goodwill, our client has added a note regarding the company's declaration about ceasing its operations in the West Bank and transferring all activities within the Green Line to the page on the website that refers to the report about Ahava's activities in the region, dated 2012.

4. It should be emphasized that our client reserves the right to amend the content of its website, including removing or publishing items and/or profile pages of companies, including that of your client, should new information become available regarding their involvement in economic activities of any kind in territories occupied by Israel in 1967, including the economic exploitation of natural resources".

For your reference - "who Profit" site-
https://www.whoprofits.org/companies/find?Text=ahava&Name=&Category=&Sector=&Headquarter=&Revenue=&Traded=&Presence=&Settlement=&Type=Table