



# CHARLOTTE TILBURY MODERN SLAVERY STATEMENT 2024

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# INTRODUCTION

Charlotte Tilbury Beauty, is a leading global premium beauty brand. Charlotte Tilbury Beauty is committed to protecting and respecting the human rights of the people who work on its behalf globally. This is the 2024 Modern Slavery Statement of Charlotte Tilbury Beauty (**Statement**). This Statement outlines the measures taken to identify, mitigate and address modern slavery risk within the business and its supply chain.

Charlotte Tilbury Limited is a private limited company registered in England and Wales with registered number 12618110. It has 19 subsidiary companies, established in the United Kingdom, the United States of America, Canada, Hong Kong, China, Macau, Ireland, Poland, Switzerland, Germany, Netherlands, France, Austria, Turkey and South Korea. It has branches in Spain and Italy. We have prepared this Statement on a consolidated basis for Charlotte Tilbury Limited and its subsidiary companies (together **Charlotte Tilbury Beauty** or commonly referred to throughout as **we, its** and/or **our**).

Charlotte Tilbury Limited forms part of Puig Brands S.A. group of companies.

This Statement has been made in accordance with section 54 of the Modern Slavery Act 2015, the Australian federal Modern Slavery Act 2018, section 11 of The Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023 and the California Transparency in Supply Chains Act 2010 (SB 657). The Statement includes an update on the commitments made by Charlotte Tilbury Beauty during the financial year ended 31 December 2024 (the Year) to ensure human trafficking and modern slavery are not taking place within its organisation and supply chain.

For the purposes of the Australian federal Modern Slavery Act 2018, the relevant reporting entity is Charlotte Tilbury Beauty Limited (**CTBL**) with registered number 08037372. CTBL operates and controls Branches in Spain and Italy for the purposes of hiring retail staff. CTBL and its branches share the same executive committee. This Statement is applicable to all legal entities belonging to CTBL, having been prepared in consultation with each legal entity that CTBL is able to control directly or indirectly by way of the shared composition of those entities.



# UPDATE FROM OUR EXECUTIVES

Modern slavery and forced labour are complex issues affecting all sectors and regions globally. The prevention of modern slavery, forced labour and human trafficking is a business priority for Charlotte Tilbury Beauty. We have a responsibility to protect and respect the human rights of our employees, contractors and workers in our global supply chain. As our business continues to grow globally, we will continue to prioritise worker welfare and conduct our operations in a responsible, transparent, and ethical manner.

Working with our partners and suppliers, we will continue to uphold our commitment towards ensuring a due diligence approach to the prevention of forced labour and protection of human rights across our business and supply chains. We recognise that to have a greater impact we must establish partnerships with organisations that work on the ground to protect workers at the most vulnerable points of the value chain.

This year Charlotte Tilbury Beauty has made significant steps forward, and we will continue to strengthen its due diligence by building and giving resource to in-house capabilities in relation to environment, social and governance (ESG) as a whole. We review our supplier relationships, operations, and procurement processes to minimise the risk of any human rights violations or slavery among workers involved in our direct global supply chain. We will also continue working closely with our supply chain partners to monitor potential and emerging risks in our extended supply chain.

This Statement was approved by the Charlotte Tilbury Limited Board of Directors on 22 May 2025.



Charlotte Tilbury  
President, Founder, Chief Creative Officer



Demetra Pinsent  
Chief Executive Officer



# KEY DEVELOPMENTS

During the year, Charlotte Tilbury Beauty made progress in the key areas below.

## TRAINING

In 2024 we launched mandatory and bespoke Modern Slavery Training, designed to educate our workforce on the signs of modern slavery, the importance of ethical practices and steps they can take to prevent and report any concerns.

## SUPPLIER & FACTORY DATABASE

In 2024, Charlotte Tilbury Beauty built an internal database to hold its supplier, factory, worker profile and audit information. The database pulls information from several third-party data sources including International Labour Organisation Data on labour rights and working conditions to flag country and sector risk. We use the information to prioritise on-site due diligence to high-risk suppliers and manufacturing sites.

## CHARLOTTE TILBURY BEAUTY AUDIT

In 2024 we developed and implemented a new audit methodology to rigorously assess and monitor our supply chain against ILO standards, local law, our policies and Supplier Code of Conduct. The Charlotte Tilbury Beauty audits focus on labour standards, H&S and business ethics and are conducted alongside our existing audit requirements.

## PARTNERSHIPS

In 2024 Puig initiated a pilot project with a leading supply chain mapping software platform. Charlotte Tilbury Beauty is engaging in this work by mapping high risk materials with key suppliers.

Having identified mica as a high-risk material through our internal raw material risk review, in 2024 Puig became members of the Responsible Mica Initiative, led by the Charlotte Tilbury Beauty Sustainability Team.





# BUSINESS STRUCTURE

Charlotte Tilbury Beauty employs over 2500 people globally and sells over 500 luxury beauty and skincare products across colour, complexion, skincare and fragrance. We work globally across 28 countries with industry leading manufacturers, distribution centres and suppliers of components, consumables, packaging, and retail tools. We value long-term relationships with our suppliers, with a current average relationship of inventory suppliers of 5.5 years. Our products are sold globally in-stores and online, through our own freestanding stores and websites as well as those of our retail partners.



**4 HEAD OFFICES**  
**3 SHARED OFFICE SPACES**



**CHARLOTTE TILBURY**  
**PRODUCTS AVAILABLE IN 56**  
**MARKETS GLOBALLY**



**OVER 2500**  
**EMPLOYEES**  
**GLOBALLY**



**21 FREESTANDING**  
**STORES GLOBALLY**



**800+ SUPPLIERS**  
200+ MANUFACTURING SUPPLIERS  
600+ NON-MANUFACTURING SUPPLIERS



**81 RETAIL**  
**PARTNERS**





# RETAIL OPERATIONS

Charlotte Tilbury Beauty products are available in 56 global markets through over 3,500 points of distribution worldwide including department stores, freestanding stores and travel retail.

# SUPPLY CHAIN

Charlotte Tilbury Beauty's supply chain consists of manufacturing suppliers and non-manufacturing suppliers.

Our manufacturing supply chain spans 28 countries, we do not own any of the manufacturing sites, all relationships are through our suppliers. Charlotte Tilbury Beauty has mapped over 350 manufacturing sites across tiers 1-3, which produce products, packaging, visual merchandising and accessories.

The manufacturing industry has a higher risk of modern slavery due to the often-labour-intensive environments and a reliance on low-skilled labour including seasonal, temporary, agency and migrant workers. Worker vulnerability is a risk of modern slavery and is heightened by employment uncertainty, countries with inadequate labour laws and ineffective grievance mechanisms. For these reasons we are prioritise our due diligence in our manufacturing supply chain.

Our supply chain tiering summarises supplier activity and our supplier relationships.





# SUPPLY CHAIN TIERING

In 2024 we updated our internal tier guide to distinguish our suppliers who manufacture Charlotte Tilbury Beauty goods, and those who offer services. This was to ensure that we capture non-inventory manufacturing suppliers into our due diligence processes. An updated tier guide is below:

## MANUFACTURING SUPPLIERS

TIER	DESCRIPTION	ACTIVITY EXAMPLE & MAPPING STATUS
1	Manufacturing and distribution centres	<ul style="list-style-type: none"><li>♦ Product, Accessories, Component &amp; Packaging Manufacturers (Fully mapped)</li><li>♦ Distribution Centres, Warehouses (Fully mapped)</li><li>♦ Store Design &amp; Visual Merchandising manufacturers (Partially mapped)</li></ul>
2	Suppliers to our manufacturing site and/or subcontracted activity	<ul style="list-style-type: none"><li>♦ Product Component &amp; Packaging Manufacturer (subcontractors) (Partially mapped)</li></ul>
3	Suppliers that processing raw materials and ingredients purchased by our manufacturers	<ul style="list-style-type: none"><li>♦ Raw Material processors (Partially mapped)</li></ul>
4	Suppliers at raw material origin	<ul style="list-style-type: none"><li>♦ Raw Material origin (To be mapped)</li></ul>

## NON-MANUFACTURING SUPPLIERS

Goods and services that support head office, retail and field teams ranging from IT, software, hardware and professional services.





# RISK ASSESSMENT, PREVENTION & MITIGATION

## MANAGING OUR RISK

At Charlotte Tilbury Beauty, we consider financial and non-financial risk in managing our business. We have a Risk Management Committee that meets at least four times a year and reports annually to the Charlotte Tilbury Limited Board of Directors (Board).



# RISK ASSESSMENT, PREVENTION & MITIGATION

## IDENTIFYING OUR RISK IN SUPPLY CHAIN

Within the Charlotte Tilbury Beauty global value chain, modern slavery risks vary by location, business activity, raw materials and supplier maturity. In our own operations our workforce consists of highly skilled office and store-based employees globally.

We identify risks in our value chain using widely recognised human rights indicator datasets and available resources including;

- ◆ ILO Data on Labour rights and working conditions
- ◆ World Bank Governance Indicators,
- ◆ Transparency International corruption risk by country,
- ◆ US Department of Labour ILAB Bureau of International Affairs Goods Produced by Child or Forced Labour List.
- ◆ Organisation for Economic Co-Operation and Development (OECD) OECD guidelines and risk reports.
- ◆ Available media articles and reports

In 2024 we contributed to a double materiality assessment at Puig which also identified forced labour as a material risk in the global value chain.

From this analysis we have determined that there is a higher risk of modern slavery occurring in our supply chain where there is a vulnerable workforce, including migrant workers, high risk regions and activities including manufacturing and raw material extraction. Our internal risk analysis concluded that the top high-risk materials from our product portfolio are mica, palm and coconut. Other high-risk materials in terms of deforestation and waste which effect local communities are soy, shea butter and cassava.

Using these risk mapping exercises we prioritised onsite due diligence with our suppliers.



# IN-COUNTRY RISK OF MANUFACTURING SUPPLY CHAIN

In 2023 we mapped the salient risks in our supply chain. We have been continuously working to address these risks throughout the Year and into 2025 and have set out below the actions taken and future commitments of Charlotte Tilbury Beauty in relation to these risks:

	2024 ACTIONS TAKEN	2025 COMMITMENTS
<p><b>MIGRANT WORKERS (DOMESTIC &amp; INTERNATIONAL)</b></p> <p>Migrant workers in any sector face a high risk of modern slavery due to language barriers, lack of understanding of employment rights, and dependence on agencies and employers for accommodation and sustenance, increasing vulnerability to exploitation including risk of payment of recruitment fees.</p>	<ul style="list-style-type: none"> <li>On-site visits to suppliers manufacturing sites in China highlighted the need for smoke detectors in dormitories for workers. Checking smoke detectors in dormitories is now an established part of the Charlotte Tilbury Beauty audit process.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to map migrant and agency workers in our whole manufacturing supply chain.</li> <li>Develop a policy on migrant workers.</li> <li>Update the Charlotte Tilbury Beauty Supplier Code of Conduct to include the Employer Pays Principle.</li> </ul>
<p><b>SOURCING IN HIGH-RISK REGIONS</b></p> <p>Modern slavery is often more prevalent in specific regions where civil liberties and human rights protections are limited.</p>	<ul style="list-style-type: none"> <li>Of the 148 audits carried out in 2024, 100 of them were in high-risk countries.</li> </ul>	<ul style="list-style-type: none"> <li>Increase the number of audits in 2025 across all manufacturing locations, prioritising high risk countries ensuring an annual cadence.</li> </ul>
<p><b>MANUFACTURING NON-RESALE PRODUCTS</b></p> <p>Due to the complexity of supply chain and process involved, lack of complete visibility of the manufacturing processes can lead to higher chance of workers exploited in absence of due diligence process.</p>	<ul style="list-style-type: none"> <li>All Charlotte Tilbury Beauty manufacturing suppliers are now involved in the due diligence process, inventory and non-inventory manufacturing suppliers.</li> <li>Non-manufacturing suppliers' sustainability performance is assessed through a desk-based approach. 84% of our inventory suppliers spend was assessed by Ecovadis.</li> </ul>	<ul style="list-style-type: none"> <li>Create and issue guidelines based on supplier taxonomy on which due diligence is required.</li> <li>Continue to prioritise manufacturing locations for onsite due diligence.</li> <li>Continue to use Ecovadis to assess our non-manufacturing supply chain.</li> </ul>

# IN-COUNTRY RISK OF MANUFACTURING SUPPLY CHAIN



	2024 ACTIONS TAKEN	2025 COMMITMENTS
<b>LACK OF FREEDOM OF ASSOCIATION AND GRIEVANCE MECHANISM</b>  Inadequate communication, whether formal or informal, between workers and management, coupled with the absence of grievance mechanisms, can create an environment where workers are unable to voice concerns and speak out against potential exploitation.	<ul style="list-style-type: none"><li>◆ Issues were identified relating to freedom of association and grievance mechanisms through our audit program, and we are working with our suppliers on time-bound plans to remediate these issues.</li></ul>	<ul style="list-style-type: none"><li>◆ Improve access to the Supplier Code of Conduct for workers by translating it to local languages.</li><li>◆ Extend our ethics helpline / Reporting Channel within our supply chain to enable access to remedy.</li></ul>
<b>DOUBLE BOOKKEEPING</b>  Double bookkeeping involves maintaining two sets of records, one accurate and one falsified. This deceptive tactic is used to conceal exploitative practices, leading to further concealment of wages, legal obligations and undermining accountability.	<ul style="list-style-type: none"><li>◆ Double bookkeeping was identified through factory audits in 2024. We are working with our suppliers on these critical issues.</li><li>◆ These issues are raised as part of the supplier review process and other stakeholders within the business.</li></ul>	<ul style="list-style-type: none"><li>◆ Continue to assess this area with Ethical auditing program, and to encourage transparency with our suppliers.</li></ul>
<b>SUBCONTRACTED MANUFACTURING UNITS</b>  Lack of visibility of supply chains limits awareness of working conditions. Without adequate due diligence in place, there is a higher chance of workers being exploited.	<ul style="list-style-type: none"><li>◆ We continue to map all existing manufacturing locations.</li><li>◆ All new suppliers are asked to declare manufacturing units as part of the on-boarding process.</li><li>◆ 148 audits were conducted by our suppliers in 2024. (These are a combination of 3rd party and Charlotte Tilbury audits).</li><li>◆ Transparency is a key part of the annual supplier review process. Suppliers are given a score on how transparent they are with their supply chain declarations.</li></ul>	<ul style="list-style-type: none"><li>◆ Enhance internal systems to ensure subcontracting is more easily identified.</li><li>◆ Develop and issue an undeclared subcontracting policy to our suppliers.</li><li>◆ Deliver factory visit training to relevant employees to spot the signs of subcontracting while on factory visits.</li><li>◆ Continue mapping our tier 2 supply chain.</li></ul>



## CASE STUDY ON BUSINESS-CRITICAL ISSUES IN HIGH-RISK LOCATION

During an audit in a high-risk sourcing location, we wanted reassurance that migrant agency-workers had free access to their passports, as retention of passports by employment agencies is an indicator of forced labour. Once this was highlighted to the supplier, they were proactive in investigating and addressing the issue where it was found with their labour agencies, so passports were released within an agreed timeframe.

Workers now have lockers at the factory, and at the dormitory where they can keep and freely access their passports.

# DUE DILIGENCE PROCESSES

## ON SITE DUE DILIGENCE

All tier 1 manufacturing sites are required to have ethical audits. Ethical audits conducted at sites in our supply chain are either semi-announced or announced and include facility tours, worker interviews and a review of documents and records.

Alongside our existing SMETA ethical auditing program, in 2024 we launched our own 1-day Charlotte Tilbury Beauty audit program. Our audit covers labour standards, H&S, business ethics and the environment. The audit was developed so we could capture a higher number of facilities over a shorter period, to assess the working conditions of more workers in our supply chain. Going forwards we will continue to use our audit combined with the SMETA 4 pillar program to monitor adherence to the Supplier Code of Conduct across our supply chain.

Semi-announced audits are used in high-risk locations, as they are a more accurate picture of the normal operations in the site and give less opportunity to prepare for audit outcomes. Announced audits are used in lower risk locations where there is less risk of inauthenticity. For higher risk locations we require audits on an annual basis, for lower risk locations we require audits in a 2-year cycle.

In 2024 we added two new auditing companies to our preferred auditors list to support us in completing more audits and increasing our on-site due diligence. We now have four global auditing partners who are instructed on our behalf to conduct SMETA and Charlotte Tilbury Beauty audits.

Non-compliances raised across SMETA and Charlotte Tilbury Beauty audits are categorised into criticality based on the severity of the issue for the worker. The categories are business critical, critical, major and minor. Business critical issues, being the highest risk to the worker, have the highest priority. Remediation plans for business-critical factories involve multiple departments within Charlotte Tilbury Beauty who meet regularly.

The results of the ethical audits are also used in the selection of new suppliers and to inform existing supplier training and remediation plans to drive supplier performance in accordance with the Code.

In 2024 our suppliers completed 148 social audits, a combination of SMETA methodology, Charlotte Tilbury Beauty and other 3rd party social audit methods.







# DUE DILIGENCE PROCESSES

## REQUEST FOR INFORMATION PROCESS

In the identification of new suppliers, we have a stage gate process managed through a Request for Information (RFI). The RFI asks Ethical, Environmental, Compliance and human rights risk questions with the results determining if a supplier meets our ethical standards and whether they are suited to further progressing to become a Charlotte Tilbury Beauty Supplier.

## LEAPING BUNNY

Since 2021, Charlotte Tilbury Beauty has achieved and maintained its accreditation with Leaping Bunny from Cruelty Free International. We use this as a tool to work with our suppliers to map and assess our existing and new raw materials. All suppliers in our product supply chains are required to comply with the Leaping Bunny Programme.

## SUPPLIER ONBOARDING

Charlotte Tilbury Beauty's Global Procurement Team manages direct procurement of inventory and non-inventory materials and services. All contracts have contractual commitments and clauses in compliance with global and local anti-slavery requirements. Supplier Executive Review Meetings with our key suppliers include a regular agenda item for Sustainability compliance.

## ECOVADIS

We are using the Ecovadis platform to determine the level of policy and certification our suppliers have in place across labour and human rights, ethics, environment, and sustainable procurement. The tool supports us and our suppliers in highlighting areas for improvement in policy and practice.

## TRACEABILITY TOOLS

In 2024, Puig launched a pilot project with a leading supply chain mapping software company to trace high-risk raw materials. Working with our suppliers we are mapping back to the material origins of several key materials.

In 2024 Puig, led by Charlotte Tilbury Beauty, joined the Responsible Mica Initiative to support the formalisation of the mica industry and the communities involved. This includes a requirement for mapping the mica supply chain which is complex and involves multiple actors. We recognise the challenges and risks of child labour and unsafe working conditions within these supply chains and are committed to playing an active role within the RMI working with our industry peers in collective action to eradicate unacceptable working conditions.



# POLICIES

## SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct (Code) sets out expectations for ethical and fair working standards in our supply chain. The Code clarifies our expectations that working conditions are safe and sanitary, working hours are within legal limits, and that workers are treated with respect and paid fairly. The Code also includes business ethics, Anti-Bribery, Corruption and environmental standards. Suppliers must take reasonable steps to ensure that there is no form of modern slavery (child labour, forced labour, human trafficking) within their operations.

## HUMAN RIGHTS POLICY

We demonstrate our commitment to upholding and respecting human rights globally by publishing our human rights policy on our websites. Human rights, rooted in dignity, fairness, equality, and respect, are fundamental values at Charlotte Tilbury Beauty. Our Human Rights Policy reflects our dedication to respecting human rights as defined by internationally recognised laws, including the UN Guiding Principles, the Universal Declaration of Human Rights, the International Covenant on Economic, Social, and Cultural Rights, the International Covenant on Civil and Political Rights, and the International Labour Organization Declaration on Fundamental Rights at Work.

Furthermore, our Human Rights Policy reinforces our commitment to continually review and assess human rights risks and to facilitate remediation in our operations and supply chain whenever necessary.

## RESPONSIBLE SOURCING POLICY

In 2023, we issued our Responsible Sourcing Policy to our inventory suppliers. In 2024 we continued to issue this policy to all new and prospective manufacturing suppliers. The Responsible Sourcing Policy contains the following requirements:

- ♦ **Transparency** – All current ingredients and materials to be mapped to the country of origin.
- ♦ **Cruelty Free** – Charlotte Tilbury Beauty products (including trade name raw materials and International Nomenclature Cosmetic Ingredients) must comply with the Cruelty Free International, Leaping Bunny criteria.
- ♦ **High Risk Materials** – For materials with higher risks of negative environmental and social impacts, e.g. mica and palm oil, we have issued specific requirements to suppliers.

## PEOPLE POLICIES

Our People team policies reflect our commitment to an internal culture based on inclusion, mutual respect, and trust. The Puig Ethical Code and our Employee Handbook are issued to all new joiners and available to employees throughout their employment. The Puig Ethical Code also forms part of the Charlotte Tilbury Beauty annual mandatory training and is rolled out to all employees globally, on an annual basis.

Our employee training, together with the Employee Handbook, Reporting Channel, mandatory Modern Slavery training and Puig Ethical Code training, are tools which support our employees towards identifying modern day slavery and reporting any concerns without fear of retaliation.



# POLICIES

## ANTI-BRIBERY & CORRUPTION POLICY

Our Anti-Bribery and Corruption Policy has a global scope and sets out the steps all officers and employees of Charlotte Tilbury Beauty must take to prevent bribery and corruption in the business and to comply with relevant legislation. In higher risk markets, we have separate and dedicated market specific Anti-Bribery and Corruption Policies, by market/region.

## SOURCING POLICY

Our internal Sourcing Policy was launched in 2024 and sets out expectations for Charlotte Tilbury Beauty employees in relation to efficient and ethical procurement processes with suppliers. The policy is in alignment with the Puig Ethical Code. The policy clearly defines the due diligence which must be in place prior to awarding contracts and expectations for our established supply base including ethical working practices, fair wages, safe working conditions and adherence to the Code.

## CHARLOTTE TILBURY BEAUTY REPORTING CHANNEL

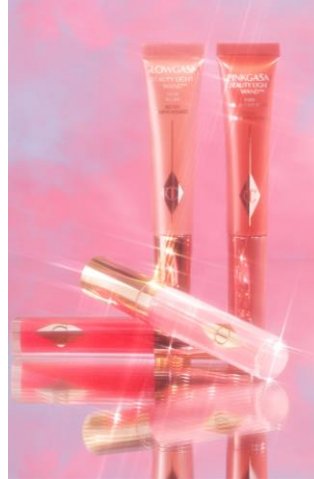
Our external and anonymous Reporting Channel Policy (outlines our approach to whistleblowing), is available to all employees (including officers, staff, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns) and stakeholders of Charlotte Tilbury Beauty and during 2025 will be promoted to suppliers and their employees.

We encourage employees and partners to 'let us know' about any behaviours which may give rise to unethical conduct or breach internal or external regulations and laws through the Charlotte Tilbury Beauty Reporting Channel. If employees feel their concerns cannot be dealt with via regular channels, they are able to use the Reporting Channel, which is confidential, anonymous and operated through an independent third party (NAVEX).

We signpost our suppliers to report any breaches to the Code the Reporting Channel.

All reports are kept confidential and are governed by the Reporting Channel Policy, which ensures an environment is created where employees feel safe and protected when reporting any possible wrongdoing or breach. The Reporting Channel Policy sets out the process to ensure that reports are treated confidentially and thoroughly always investigated with the highest levels of integrity. Further, the Reporting Channel Policy mandates that any person submitting a shall be protected from any kind of retaliation. In 2024, there were no reports relating to modern slavery or forced labour.





# TRAINING

All Charlotte Tilbury Beauty employees are required to complete training on ethical business practices. The Modern Slavery and Anti-Bribery and Corruption training modules are completed annually and made available on our internal learning platform. New starters undertake this training as part of their induction programme. Certain employee non-contractual benefits are contingent on employees completing all mandatory training.

In 2024, c.1500 employees were trained on Modern Slavery through a bespoke training course. The new training highlights the signs of modern slavery, the importance of ethical practices and steps they can take to prevent and report any concerns. By equipping our employees with this knowledge, we aim to foster a culture of responsibility ensuring that our business and supply chain remain free from exploitation and abuse.



# MEASURING EFFECTIVENESS

The effectiveness of our actions against preventing, mitigating and managing the modern slavery risks at Charlotte Tilbury Beauty are assessed through several key performance indicators:

- ◆ Number of employees trained in Modern Slavery
- ◆ Number of grievances raised through our Reporting Channel
- ◆ Number of onsite due diligence audits
- ◆ Number of findings and remediated issues identified from onsite due diligence audits
- ◆ Number of mapped sites across our supply chain
- ◆ Regular risk assessments using updated third-party datasets

Through the supplier lifecycle, suppliers' risks are measured in the RFI process, assessed during the annual supplier review and managed with cross departmental teams.

Our internal processes monitor the progress of these KPI's and risks and ensure they are managed accordingly through our governance structure.

- ◆ Business critical factory reviews with business teams
  - ◆ Sustainable Business Committee
  - ◆ Risk Management Committee
  - ◆ Executive Board



# FORWARD LOOK

With our commitment to continuous improvement and the growth of our Sustainability, Regulatory and Legal teams we will continue to drive our efforts to enhance human rights, ethics, and raw material traceability within our supply chain.

A summary of our 2025 commitments are below:

## SET HIGHER STANDARDS TO OUR SUPPLY CHAIN

- ◆ Update and issue our Human Rights Policy
- ◆ Update and issue the Code
- ◆ Develop and issue Human Rights Remediation Policy, Child Labour Policy, Child Labour Remediation Policy, Migrant Worker Policy
- ◆ Audit all tier 1 manufacturing locations

## ACCESS TO REMEDIATION

- ◆ Review effectiveness of current whistleblowing procedure for workers
- ◆ Establish collaborative partnerships with third parties to improve access to remedy for workers

## SET HIGHER STANDARDS INTERNALLY

- ◆ Mandatory modern slavery training for all head office employees
- ◆ Responsible purchasing practices resources to be issued

## INCREASE SUPPLY CHAIN VISIBILITY

- ◆ Continue to map our entire tier 1 manufacturing locations
- ◆ Increase mapping of tier 2 & 3 manufacturing locations
- ◆ Map high risk tier 4 regions
- ◆ Increased nature and raw materials mapping, to risk assess impacts on local communities and modern slavery indicators
- ◆ Contractual obligations for manufacturing suppliers to declare manufacturing locations
- ◆ Establish partnerships in industry to support supply chain mapping processes

