



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **INTRODUCTION**

At Clarins UK Ltd we are fully committed to ensuring that there is no modern slavery or human trafficking in any part of our business. We recognise the responsibility that we share with our suppliers and partners to hire responsibly, buy materials, and sell our products in an ethical manner. As far as reasonably practicable we require our Partners and Suppliers to uphold our strict ethical values and demonstrate transparency within their supply chains.

### **ORGANISATION STRUCTURE**

Clarins UK Ltd is part of the Clarins Group of Companies; the headquarters are based in Paris, France. Clarins Group, trading as Clarins, is a French luxury cosmetics company, which manufactures worldwide prestige skincare and cosmetics, usually through high-end department stores and selected pharmacies. In the UK approximately 22% of our sales is through our E-Commerce website with direct-to-consumer shipments.

### **OUR BUSINESS**

Clarins is a family-owned company who are a World Leader in cosmetics, skin care and make-up. Our brands are distributed in over 150 countries.

At Clarins Group, Responsible Development is a continuous approach to improvement; deeply rooted in the development of the company since its origin that aims to promote the economic, environmental, and social performance of the company to build a better, sustainable world for everyone, everywhere.

We pride ourselves on our work to help enhance economic, environmental, and social performance.

Social performance covers all actions that target social progress; human rights, improving living conditions and health (access to water, nutrition), job creation, respect for staff & partners and knowledge exchange. Social performance is where we seek to help abolish modern slavery and human trafficking.

We undertake annual wage checks and benchmark salaries to ensure that our employees and workers are paid fairly and competitively for the work that they do.

This year we have made further progress on our journey to achieve B Corp certification by 2024. Since its creation, Clarins has been driven by its values of respect for the environment and is convinced of the importance of Sustainable Development. We have therefore set ourselves an ambitious goal to obtain the B Corp certification. B Corp certification measures the positive impacts of companies on their ecosystem in 5 areas: Governance, People, Community,

Environment and Customers. It will enable us to highlight our current commitments and strengthen our approach to continuous progress throughout the Group.

## **OUR POLICIES THAT HELP TO PREVENT MODERN SLAVERY AND HUMAN TRAFFICKING**

Clarins UK has built their business based on integrity and trust incorporating high ethical trading standards. We operate the following policies that support the identification of modern slavery and help to combat human trafficking: -

**Whistleblowing Policy** - Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. All workers are required to be watchful for illegal or unethical conduct and are required to report any such activity. Our policy aims to make it easy for workers to make disclosures without the fear of reprisal. Employers, customers or others who have concerns can contact our Human Resources department or if they prefer to remain anonymous via our Whistleblowing portal <https://report.whistleb.com/portal/clarins> We also have a unique e-mail address <mailto:whistle.uk@clarins.com> and postal address: **STRICTLY CONFIDENTIAL, Whistle Committee, Clarins UK Ltd, 10 Cavendish Place, London W1G 9DN, United Kingdom.**

**Ethics Charter & Anti-Corruption Code of Conduct** - All company employees must behave honestly, ethically, and lawfully during their employment. Employees have a duty to report any evidence of dishonest or improper activities to Management. We updated and redistributed the Ethics Charter and Code of Conduct in 2023 to all employees.

**Clarins Procurement Charter** - We expect our suppliers to operate in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption. By incorporating the ten Principles of the UN Global Compact in our Responsible Procurement Charter we are not only asking our Suppliers to uphold to basic responsibilities to people and planet, but also setting the stage for long-term success. The International documents that Clarins refer to include:

- \* Universal Declaration of Human Rights
- \* United Nations Global Compact initiative
- \* OECD Guiding Principles
- \* The International Labor Organization Fundamental Conventions
- \* UNESCO Convention on the Rights of the Child

Clarins UK is committed to ensuring that its suppliers and partners adhere to the highest standard of ethics. All of our suppliers are required to demonstrate their commitment to corporate social responsibility, and this is tested as part of the tender and selection process. We encourage our top suppliers, categorised by value of spend to complete an EcoVadis survey. The EcoVadis survey rates suppliers on a broad range of non-financial management systems including Environmental, Labour & Human Rights, Ethics and Sustainable Procurement impacts. We build lasting relationships and work closely with our partners and suppliers to ensure that they uphold the Clarins values. Respect is a value that is actively supported across the business not only for each other and our business partnerships, but also the environment. This will be strengthened by achieving B Corp certification which assesses this area robustly. In 2023 we reviewed our new

supplier set up process and strengthened the criteria for partnership. We issued our 'We Care' Procurement Policy, Ethics Charter and Procurement Code compliance letter to all our Suppliers asking them to meet the fundamental responsibilities in the areas of human rights and the ten principles of the global UN Global Compact.

**Recruitment/Agency & Contract Workers Terms & Conditions** - All of the recruitment agencies and contractors that we work with are reputable. We undertake checks to understand what workers will be paid by fully understanding the breakdown of agency and contractor margins. This allows us to ensure that there is a fair rate of pay for anyone who carries out work for us. We also conduct rigorous checks on the right to work in the UK. In 2023 we reviewed our preferred supplier list for recruitment partners and ensured that their diversity, equity and inclusion and CSR policies were aligned with Clarins values and standards.

## **DUE DILIGENCE**

We undertake due diligence when selecting new suppliers or when entering partnerships to ensure that Clarins UK high ethical standards are upheld. We also actively manage contracts and monitor existing supplier's performance to provide assurance that our standard requirements are upheld.

This includes checking for general legislative compliance of labour standards and fair rates of pay to safeguard against modern slavery and human trafficking.

If we have to source goods from outside the UK and EU where there is a higher risk of slavery and human trafficking; we will where possible work in partnership with companies who hold SA8000 certification or subscribe to the IMO Fair for Life programme. This helps to provide assurance of the company's commitment to human rights, workers conditions and the provision of the living wage.

Clarins UK will not knowingly work with or award contracts to Suppliers who cannot commit to supporting the eradication of modern slavery and human trafficking.

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values in this regard.

We encourage anyone, including colleagues, subcontractors, suppliers, customers and clients to report in good faith any issues or concerns about potential unethical business practices. These can be reported to the Human Resources Director or the Statutory Officer.

## **TRAINING & RAISING AWARENESS**

Clarins UK aims to raise awareness and train all staff involved in procurement and supply chain activity to ensure that they understand and have an awareness of: -

- The basic principles of the modern slavery act.
- The conditions and impact of unrealistically low prices and extremely tight deadlines that give rise to the increased risk of slavery and human trafficking.
- How to raise potential slavery and human trafficking issues to the relevant people within the organisation
- What external help is available e.g. The modern slavery helpline
- Ethical behaviour and anti-corruption practices

**This statement is made pursuant to section 54(1) of the modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December, 2023.**

**SIGNED:**

A handwritten signature in black ink that reads "D. Lewis". The signature is written in a cursive style with a large, stylized initial 'D'.

**POSITION: Managing Director, Clarins UK Ltd**

**Date: 31<sup>st</sup> January, 2024**