

Estee Lauder Pty. Limited

Modern Slavery Statement for the financial year ended 30 June 2024

Reporting entity and reporting period

For the purposes of this Modern Slavery Statement the reporting entity is Estee Lauder Pty. Limited (ACN 008 444 719) ("**Estee Lauder Australia**"). Estee Lauder Australia has no subsidiaries.

This Statement covers Estee Lauder Australia's reporting period of 1 July 2023 to 30 June 2024 ("**FY24**").

Estee Lauder Australia is a wholly owned subsidiary of Estee Lauder Cosmetics Limited, an indirectly owned subsidiary of The Estée Lauder Companies Inc. ("**ELC**"), with its principal business address at Level 24, 201 Elizabeth Street, Sydney NSW 2000, Australia.

This statement is an annex to the ELC enterprise-wide Modern Slavery statement ("[ELC Modern Slavery Statement](#)", a copy is attached hereto as Appendix I), which outlines ELC's approach to respecting human rights across its global operations and supply chain and steps it has taken to minimize the risk of modern slavery occurring in ELC's business and supply chains. This annex statement provides additional details outlining the steps Estee Lauder Australia has taken to identify, assess and address the risk of modern slavery practices in Estee Lauder Australia's operations and supply chains.

Where the context permits, references to ELC in this statement apply equally to Estee Lauder Australia.

Our local structure, operations and supply chains

(See "Organizational Structure and Supply Chains" and "Policies in Relation to Modern Slavery and Human Trafficking" in the ELC Modern Slavery Statement.)

Estee Lauder Australia is a retailer, wholesaler and distributor of makeup, skincare, fragrance and haircare products. Brands marketed by Estee Lauder Australia include Estée Lauder, Clinique, M·A·C, Jo Malone London, Bobbi Brown Cosmetics, La Mer, Aveda, TOM FORD, Aramis, KILIAN PARIS, Lab Series, AERIN Beauty and Le Labo. Products are sold to consumers through retailers including department stores, specialty stores, pharmacies, salons, spas and through our own direct to consumer online platforms and freestanding stores. Partnering with retailers is key to Estee Lauder Australia's business model and the distribution of ELC products throughout Australia is managed from Estee Lauder Australia's principal business office above and the warehousing facilities in 6 Millner Avenue, Horsley Park, Kemps Creek NSW 2178, Australia.

Estee Lauder Australia imports finished products that are manufactured either by ELC's owned facilities or approved third party manufacturers using suppliers that should comply with our ELC's Supplier Code of Conduct (see more details below). Estee Lauder Australia does not manufacture any products in Australia; the facility in Australia is an office for retail and distribution processes only. Most products are imported from a distribution hub in Singapore which also does not manufacture but receives products from the same facilities around the world. In some instances, Estee Lauder Australia receives products from ELC's facilities directly (launch

products and Aveda brand) and in some cases for promotional activities directly from approved third party facilities to avoid unnecessary extra handling.

Estee Lauder Australia also purchases some materials for online services, promotional (collateral) activities, shop fitting and other services from various Australian domiciled companies which must also comply with the laws of Australia, including the Australian Modern Slavery Act. Companies used or engaged vary in size from small local organizations to larger publicly listed companies, and in all cases, Estee Lauder Australia expects all companies to comply with the laws of the land.

At the date of this statement, Estee Lauder Australia employs more than 800 employees in Australia. These employees are based in department stores including Myer and David Jones, Jo Malone London/M·A·C/Aveda freestanding stores, Estée Lauder corporate and outlet stores, office and interstate field teams and warehouse premises. There are more than 30 freestanding Estée Lauder stores in Australia and over 500 points of sale catering to consumers at Australian retail outlets and online.

Risks of modern slavery practices in our operations and supply chains

(See "Supplier Due Diligence and Risk Assessment" in the ELC Modern Slavery Statement.)

Certain of Estee Lauder Australia's principal tier 1 suppliers are entities within ELC's global network. For example, ELC manufactures its products primarily in its own facilities in the United States, Belgium, Switzerland, Japan, the United Kingdom and Canada, while also leveraging global third-party manufacturing networks. Estee Lauder Australia subsequently imports finished products that are manufactured either by ELC's owned facilities or by approved third-party manufacturers. Where these entities are Estee Lauder entities over which we have a high degree of visibility, regardless of their locations, we consider the risk of modern slavery within our operations and in these internal supply chains to be low.

Some possible risks identified in ELC's (including Estee Lauder Australia's) operations and supply chains are:

- Working directly or indirectly with suppliers in farming, remote and/or rural regions, that employ temporary, seasonal and/or immigrant workers; and
- High demand for our products and delivery timeframes which may require ELC suppliers to engage in practices including imposing excessive working hours.

ELC (including Estee Lauder Australia) aims to mitigate the risk of modern slavery occurring in our operations and supply chains by promoting and enforcing our policies, including but not limited to ELC's Supplier Code of Conduct, performing due diligence and assessment, and maintaining internal accountability and training as more detailed below and/or in the ELC Modern Slavery Statement. These policies, controls and processes have been widely communicated within ELC's businesses, including Estee Lauder Australia, and guidance has been provided to management across all group companies including Estee Lauder Australia.

Actions taken to assess and address the risks of modern slavery occurring in our operations and supply chains

(See "Policies in Relation to Modern Slavery and Human Trafficking" and "Supplier Due Diligence and Risk Assessment" in the ELC Modern Slavery Statement. We set forth below some highlights.)

As per the ELC Modern Slavery Statement (see "Policies in Relation to Modern Slavery and Human Trafficking"), ELC has conducted a corporate-level Human Rights Assessment ("**HRA**") based on the methodology outlined by the UN Guiding Principles on Business and Human Rights, the global standard for HRAs. Through the HRA process, ELC assessed human rights risks and impacts across its operations, including its corporate policies and procedures, as well as its supply chain, manufacturing, and retail operations. The HRA has provided ELC with a framework to help identify and prioritize its salient human rights risks and impacts, and to identify key actions for improvement.

In relation to Estee Lauder Australia's external supply chains, all of ELC's significant suppliers are evaluated using the EcoVadis platform (see "Supplier Due Diligence and Risk Assessment" in the ELC Modern Slavery Statement). Direct strategic suppliers – those with the highest level of collaborative partnership – are expected to achieve an "advanced" EcoVadis score and other direct suppliers are expected to achieve at least a "satisfactory" score.

Suppliers are also subject to a risk-based due diligence assessment annually as part of new supplier qualification test implemented by ELC. Certain suppliers are also required to undergo additional on-site audits via third party providers to confirm compliance, and these suppliers are selected depending on criteria relevant to risk.

Country risk is separately assessed by a third-party provider based on that country's approaches to social impact and sustainability topics including environment, health and safety, social issues, corruption, and human rights risks.

Commitment, policies and training

Collaborating with our suppliers is an integral part of ELC (including Estee Lauder Australia's) operation. While we cannot control all actions of our suppliers, we expect suppliers to treat their employees with dignity and respect and to comply with all legal and regulatory requirements pertaining to the fair and equitable treatment of employees. To that end, all suppliers are expected to understand and give a written commitment to comply with ELC's Supplier Code of Conduct (the "[Supplier Code](#)"), which outlines ELC's expectations for suppliers with respect to human rights; safe, healthy, and equitable workplaces; and the protection of the environment and local communities. It is the foundation of ELC's program to source responsibly. The [Supplier Code](#) is based on internationally recognized standards, including the Universal Declaration of Human Rights and International Labor Organization's Convention

In addition, all ELC employees, locations, operating companies and employees of subsidiaries and joint ventures in which ELC holds a majority interest are required to comply with ELC's [Human Rights Policy](#), which has been formulated having regard to ELC's HRA as well as the ELC [Code of Conduct](#). Employees above certain levels (including managers and supervisors) are required to complete [Code of Conduct](#) training.

(See otherwise "Employee Education and Training" in the ELC Modern Slavery Statement.)

Remediation

ELC monitors its direct suppliers for adherence to the [Supplier Code](#) and pays careful attention to potential risks of noncompliance. As stated in ELC's [Supplier Code](#):

"If an ELC Supplier appears to be in noncompliance with the Supplier Code, we expect the ELC Supplier to cooperate and provide additional information, for us to decide whether such ELC Supplier is in compliance.

If we determine the ELC Supplier is not in compliance, then the remedies may include, among other things, termination of business with ELC or the development and implementation of a

corrective action plan that would need to be implemented within a certain fixed time period. ELC may follow such implementation by a follow up audit, as it deems appropriate."

In ELC's own operations, our Human Resources function verifies work eligibility during the hiring process. We also conduct audits to ensure that we are in compliance with minimum wage and age requirements. Estee Lauder Australia also verifies and ensures all Australian based employees and independent contractors have the right to work in Australia.

Further, ELC's employees and contractors are encouraged to promptly report any known or suspected breach of ELC's [Human Rights Policy](#) or [Code of Conduct](#) or other illegal or unethical behaviour, including human rights violations. This is supported by the ELC Integrity Helpline (<https://integrity.elcompanies.com>), which is a resource available for employees, suppliers, customers, and other stakeholders to report conduct that may be illegal, unethical or a violation of ELC's [Code of Conduct](#), [Human Rights Policy](#), or [Supplier Code](#). Concerns may be reported to the ELC Integrity Helpline via telephone or web, 24 hours a day, 7 days a week and in many languages.

ELC has standard operating procedures to manage reports to ensure consistent investigation and response procedures across incident types and reporting channels. Serious violations are reviewed by the ELC's Ethics and Compliance Committee, which oversees implementation of the [Code of Conduct](#). In line with our values, we confirm that we would take all appropriate steps to rectify any confirmed incidences of modern slavery in our operations or supply chains.

(See otherwise "Remediation" in the ELC Modern Slavery Statement.)

Accountability

Any employee or contractor discovered to be involved in inappropriate conduct or in violation of ELC's [Human Rights Policy](#) or [Code of Conduct](#), or Estee Lauder Australia's policies, our procedures and/or applicable laws or regulations, is subject to corrective action, up to and including termination of employment or engagement.

Potential and existing suppliers who fail to comply with ELC's expectations, including [Supplier Code](#), or who fail due diligence processes, will not be contracted with or may have their contract terminated if they do not improve.

The effectiveness of actions being taken to assess and address modern slavery risks

Estee Lauder Australia periodically reviews all its processes, procedures and policies to ensure they remain up to date and align with ELC group guidelines and the best industry practices globally.

Consultation

Estee Lauder Australia liaises with and is directed by the broader ELC group, led by its headquarters in New York, to better understand the progress made and lessons learned from experiences in other jurisdictions with relevant legislation.

Approval

This Modern Slavery Statement is made in accordance with section 13 of the *Modern Slavery Act 2018* (Cth).

This Statement was approved by the Board of Directors of Estee Lauder Pty. Limited on December 23, 2024.

Signed for and on behalf of Estee Lauder Pty. Limited

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Emmerentia Wilding
Director of Estee Lauder Pty. Limited

Appendix I ELC Modern Slavery Statement

Modern Slavery

Introduction

Every day at The Estée Lauder Companies (we, us, our or ELC),¹ we make choices that we know will have impact far beyond our business, and that is a responsibility we take very seriously. As we approach our operations and our supply chain, we aspire to foster respect for people and the environment and to be a positive influence in every community in which we operate and from which we source.

As a global company, we comply with laws and regulations where we conduct business. We also look to those who provide us with services or goods (collectively “suppliers”) to operate in compliance with all applicable laws, including, but not limited to, supply chain integrity, employment laws pertaining to forced labor and human trafficking, child labor, minimum wages, overtime compensation, hiring, and occupational safety.

This statement outlines our approach to respect human rights across our global operations and supply chain and recognizes these international protocols:

- United Nations Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights

This Modern Slavery statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, and the California Transparency in Supply Chains Act, and outlines the actions undertaken in the fiscal year ended June 30, 2023, to identify and minimize risks relating to modern slavery in our business and enterprise.

Respect for Human Rights

ELC respects human rights across our global operations and supply chain.

The UN Guiding Principles on Business and Human Rights provide a framework to help us identify and prioritize our human rights risks and impacts. Proactive human rights due diligence is an ongoing process, and we have policies, processes, training, and systems in place to identify, assess, monitor, and mitigate or eliminate actual or potential human rights impacts.

We are required by the aforementioned Guiding Principles and the UK Modern Slavery Act 2015 to disclose publicly the steps we are taking to identify and eradicate forced labor and human trafficking in our supply chains. The following describes ELC's relevant global commitments and initiatives.

Organizational Structure and Supply Chains

Business Structure

ELC is one of the world's leading manufacturers, marketers, and sellers of quality skin care, makeup, fragrance, and hair care products. Established in New York in 1946, the company's products are now sold in approximately 150 countries and territories under brand names including: Estée Lauder, Aramis, Clinique, Lab Series, Origins, M·A·C, La Mer, Bobbi Brown Cosmetics, Aveda, Jo Malone London, Bumble and bumble, Darphin Paris, TOM FORD, Smashbox, AERIN Beauty, Le Labo, Editions de Parfums Frédéric Malle, GLAMGLOW, KILIAN PARIS, Too Faced, Dr.Jart+, and the DECIEM family of brands, including The Ordinary and NIOD.

ELC has three main geographic regions: Asia/Pacific; Europe, the Middle East & Africa (EMEA); and The Americas. Each region is composed of one or more affiliates. Today we have affiliates in 50+ countries and territories.

Our products are sold on our own and authorized retailer websites, on third-party online malls, in stores in airports, in duty-free locations and in our own and authorized freestanding stores. In addition, our products are sold in brick-and-mortar retail stores, including department stores, specialty-multi retailers, upscale perfumeries and pharmacies and prestige salons and spas.

Employee Population

With over 60K+ employees worldwide, we recognize that in order to properly serve the communities in which we live and work, our workforce and products must reflect and represent this global diversity.

We strive to promote a safe, inclusive, and diverse work environment where all employees feel welcome and valued. It is the policy and practice of this company to provide all employees and applicants for employment with equal employment opportunities without regard to race, creed, color, religion, sex, gender, age, national origin, alienage or citizenship status, sexual orientation, gender identity or expression, marital, partnership or familial status, disability, genetic information, veteran/military status, domestic violence victim status, or any other characteristic protected by law. This policy applies to all company activities, including, but not limited to recruitment, hiring, compensation, assignment, training, promotion, discipline and discharge.

Supply Chain

Our Global Supply Chain includes a vast network of direct and indirect suppliers (collectively, “ELC Suppliers”) through which we purchase materials and services that are an integral part of our operations. Our direct supply chain is comprised of suppliers that directly contribute to ELC’s products, packaging, and/or production, such as those that provide the raw ingredients for our product formulations, the materials that contribute to our packaging solutions, and third-party manufacturers. Our indirect supply chain is composed of suppliers who sell us goods and services not directly used in the manufacturing of our products, such as creative partners, stores/visual merchandise, IT services and more. We aim to develop long-lasting, trusting, and mutually beneficial relationships with a common basis of shared values and commitment to operating responsibly and ethically.

Our Global Supply Chain includes our world-class Manufacturing and Fulfillment, Distribution and Logistics, and Procurement and Planning operations. The collective team plans, crafts, and delivers the highest quality products and packaging for our consumers around the world. The Global Supply Chain partners closely with Global Research and Development (R&D)/Innovation as an end-to-end supply chain, which encompasses the lifecycle of the company's products – from inception to delivery to our consumers' hands. Underpinning the supply chain are shared teams that ensure the quality, sustainability, safety, and innovation that spans across all that we do.

We manufacture our products primarily in our own facilities in the United States, Belgium, Switzerland, Japan, the United Kingdom, and Canada, while also leveraging global third-party manufacturing networks. We continue to evaluate our manufacturing facilities and processes and identify sourcing opportunities to improve innovation, increase efficiencies, minimize our impact on the environment, ensure supply sufficiency, and reduce costs.

Sourcing Responsibly

We're committed to helping our suppliers uphold the same ethical standards to which we hold ourselves accountable, within the context of local jurisdiction.

ELC sources ingredients and materials from around the world to manufacture our beauty products. Our teams work diligently to source ingredients responsibly and with attention to potential impacts on people and the environment. We aim to continuously strengthen our sourcing practices while remaining sensitive to the local communities in which we operate.

Our Responsible Sourcing team is part of our Global Procurement organization and broader Global Supply Chain function. The team works closely with the Global R&D, Global Corporate Citizenship and Sustainability, Packaging, and Legal functions. The team establishes, implements, and monitors environmentally and socially responsible and ethical sourcing practices to ensure that performance is aligned with our goals and objectives. We collaborate with our brands, suppliers, industry groups, and peers to continuously advance our practices.

As a condition of doing business with ELC, we expect our suppliers to honor our company values and our commitment to operating as a responsible and sustainable corporate citizen. In partnership with our suppliers and everyone we touch, we are committed to compliance with the law, ethical business practices, and fostering our heritage of respect for people and the environment and serving as a positive influence in the communities we serve and from which we source.

We aim to support businesses owned by a wide cross section of individuals, including ethnic minorities, women, the LGBTQIA+ community, veterans, and people with disabilities through our procurement practices. Our objective is to help drive inclusive economic development and growth of diverse and small businesses in the supplier base.

Policies in Relation to Modern Slavery and Human Trafficking

Human Rights Policy

We have conducted a corporate-level Human Rights Assessment (HRA) based on the methodology outlined by the UN Guiding Principles on Business and Human Rights, the global standard for HRAs. Through the HRA process, we assessed human rights risks and impacts across our operations, including our corporate policies and procedures, as well as our supply chain, manufacturing, and retail operations. The HRA has provided us with a framework to help identify and prioritize our salient human rights risks and impacts, and to identify key actions for improvement. Read our [Human Rights policy](#).

This policy applies to all ELC employees, locations, operating companies and employees of subsidiaries and joint ventures in which we hold a majority interest. We also expect our suppliers to respect human rights in their own operations and supply chains. We promote a culture of uncompromising ethics and integrity and put forth standards to uphold the principles and ideals that make us a global leader in prestige beauty. We have tailored approaches for various stakeholder groups that focus on key risks and opportunities.

Supplier Code of Conduct

Our Supplier Code of Conduct (“Supplier Code”), along with ELC’s Human Rights Policy, outlines our expectations for suppliers with respect to human rights, and local communities, as well as the workplace. It is the foundation of our program to source responsibly. The Supplier Code, which is based on internationally recognized standards, including the Universal Declaration of Human Rights and International Labor Organization’s Conventions, is organized into three sections:

- Engage in lawful and ethical business practices
- Promote a respectful, fair, and inclusive workplace
- Provide a safe, healthy workplace and protect the environment and community

It covers areas including Confidentiality and Privacy, Fair Competition, Child Labor, and Forced Labor, among others. To meet the needs of our diverse and global network of suppliers, the Code is available in several languages.

In conjunction with our standard purchasing contracts, the Supplier Code requires that suppliers be in full compliance with all applicable governmental, legal, regulatory, and professional rules and regulations governing minimum wages, work hours, overtime compensation, hiring, occupational safety, forced and/or child labor. This policy sets forth the basic requirements we expect of suppliers, including vendors, service providers, independent contractors and consultants, as a condition of doing business with ELC.

The Supplier Code specifies that ELC Suppliers must not employ child labor. The term “child” means any person employed under the age of 15 (or 14 where the law of the country permits) or under the minimum age for employment in the country, whichever is greater. ELC Suppliers employing young workers (workers above the minimum age of employment but under the age of 18) must comply with applicable laws and regulations regarding hours, compensation and must avoid conditions or restrictions that could be harmful to their morals, health, safety, and development. These same expectations are upheld at all ELC owned and operated sites.

The Supplier Code also specifies that ELC Suppliers must not use or benefit from any form of human trafficking, or forced or compulsory labor of any kind, be it prison, bonded, indentured or otherwise. Furthermore, mandatory overtime is not permitted, and workers must be allowed to leave their employment after giving reasonable notice. Imposing monetary fines, withholding identity papers (such as passports), work permits, remuneration or requiring recruitment deposits or other constraints as a condition of employment, is not allowed.

Supplier Sustainability Guidelines

In addition to the Supplier Code, our Supplier Sustainability Guidelines provide suppliers with practical actions they can take to manage the environmental and social impacts of their own operations. These Guidelines help suppliers to build on the foundation and standards of the Supplier Code requirements and apply to its business sustainability and human rights best practices and continuously improve.

Read our [Supplier Sustainability Guidelines](#).

Supplier Due Diligence and Risk Assessment

We take a risk-based approach to supplier due diligence. We conduct due diligence as part of new supplier qualifications and assess risk of existing direct and indirect suppliers annually. We risk-rank direct and indirect suppliers globally based on pre-established criteria, such as location of operations, type of goods or services being sourced, and potential impact to our business. Based on the risk ranking of the supplier, we conduct additional due diligence using third-party on-site audits or assessments, as appropriate. To help us determine country risk, we use a third-party provider that assesses each country based on its approaches to social impact and sustainability topics including environment, health and safety, social issues, corruption, and human rights risks.

Effectively addressing the challenges related to sustainable sourcing requires collaboration between governments, civil society, local communities, and private enterprise. As part of this process, we are committed to partnering with organizations that help us build and strengthen our sourcing strategies and participating in multi-stakeholder collaborative initiatives to ensure continuous improvements in our sourcing practices.

We monitor our suppliers to ensure adherence to the Supplier Code and pay careful attention to potential risks. We conduct risk assessments and perform due diligence on select direct and indirect suppliers. We also monitor supplier performance and implement corrective action plans as needed.

Notably, ELC works with ELC Suppliers, as appropriate, to ensure they fully understand the intent and requirements of the Supplier Code. ELC Suppliers are expected to make all reasonable efforts to communicate the Supplier Code, to their workers, as appropriate, and provide workers with the opportunity to ask questions and raise concerns.

ELC approves new suppliers or new manufacturing plants after suppliers meet the requirements set forth in the Supplier Code evaluation process, which requires all ELC Suppliers to sign the Supplier Code and applicable ELC Suppliers to complete an assessment or on-site audit. ELC then contracts with third parties to conduct on-site audits for ELC Suppliers that are selected based on criteria such as geography, type of material, and impact to the business.

We also use EcoVadis, an online ratings service, to help us assess direct and indirect suppliers on their environmental, labor, and human rights, ethics and procurement policies, practices, and reported results. The EcoVadis tool ranks suppliers with numerical scores that reflect the maturity level of their sustainability programs, practices, and initiatives. We expect our direct strategic suppliers – those with the highest level of collaborative partnership – to achieve an “advanced” EcoVadis score and other direct suppliers to achieve at least a “satisfactory” score. We engage with direct suppliers to help them improve.

Internal Accountability and Training

We promote a culture of uncompromising ethics and integrity with standards to help us uphold the principles and ideals that make us a global leader in prestige beauty.

Accountability

We expect our employees and business partners to conduct business in compliance with applicable laws and regulations and with the high ethical standards and policies set forth in our ELC Code of Conduct (“Code”) and Supplier Code.

Our Code helps to protect our reputation as an ethical corporate citizen. Newly hired employees are required to sign an acknowledgement that they have received, read, and will comply with the Code. In addition, annually, employees above certain levels are required to complete code of conduct training and acknowledge the code. From time to time, we conduct additional trainings on the Code for groups of our employees.

Remediation

We promote a speak-up culture and provide a mechanism for reporting suspected misconduct. The [ELC Integrity Helpline](#) is a resource available for employees, suppliers, customers, and other stakeholders to report conduct that may be illegal, unethical or a violation of our Code, Human Rights Policy, or Supplier Code. Concerns may be reported to the ELC Integrity Helpline via telephone or web, 24 hours a day, 7 days a week and in many languages.

We have standard operating procedures to manage reports to ensure consistent investigation and response procedures across incident types and reporting channels. Serious violations are reviewed by the company’s Ethics and Compliance Committee, which oversees implementation of the Code.

We will not tolerate retaliation against anyone who in good faith raises questions or concerns about a potential violation of the law, our Code, or company policies, or who assists in an investigation of a reported violation. Retaliation in any form is itself a serious violation of our Code and is strictly prohibited. Acts of retaliation or potential retaliation should be reported immediately. Anyone found to have retaliated against an individual will be subject to disciplinary action, up to and including termination of employment.

For further information about our wider sustainability efforts, please see our latest [Social Impact and Sustainability Report](#).

The Estée Lauder Code of Conduct

The ELC Code of Conduct ("Code") outlines our expectations for promoting a respectful workplace, engaging in ethical business practices, and operating in a socially responsible and fair manner.

ELC employees are expected to conduct themselves at all times within the letter and the spirit of the Code. Employees are required to sign off on the Code upon hire and certain employees receive Code refresher training. We conduct training for managers, supervisors and other appropriate employees on topics related to our Code, inclusive of unconscious bias and inclusion and diversity training. ELC has policies, processes, training, and systems in place to identify, assess, monitor, and mitigate or eliminate actual or potential human rights impacts. Read our [Code of Conduct](#).

E-Learning

We lean on the tools of collaboration and partnerships to advance our responsible sourcing practices, and that includes bringing our employees along on our journey. ELC launched "Sourcing Responsibly at ELC", an E-learning program available on our internal ELC Learning Hub.

The primary objective of this course is to equip our employees with a comprehensive understanding of Sourcing Responsibly at ELC. Through this learning journey, participants are introduced to the internal and external initiatives undertaken by the Responsible Sourcing team, all of which are aligned with the core principles of ELC's Sourcing Responsibly Strategy.

- [ELC Enterprise Modern Slavery Statement \(2024\)](#)
- [UK Anti-Slavery and Human Trafficking Statement \(2023\)](#)
- [Australia Modern Slavery Statement \(2023\)](#)
- [Canada Forced Labour and Child Labour in Supply Chains Act – Annex Statement \(2024\)](#)

¹ELC, WE, US, AND OUR REFER TO THE ESTÉE LAUDER COMPANIES INC. AND ITS SUBSIDIARIES. IN THE CASE OF RECENTLY ACQUIRED SUBSIDIARIES OR BUSINESSES (E.G., DECIEM), APPLICATION OF THIS POLICY WILL BE SUBJECT TO A TRANSITION PERIOD, THE LENGTH OF WHICH WILL DEPEND ON THE STATUS AND CAPABILITIES OF THE ACQUIRED BUSINESSES AND/OR ENTITIES. AS PART OF AN OVERALL INTEGRATION PLAN, ELC WOULD BRING NON-SHARED SUPPLIERS (I.E. SUPPLIERS NOT ALREADY COVERED BY ELC'S PROGRAM) INTO ELC'S PROGRAM. AS SUCH, THERE MAY BE A GAP IN SOME ELEMENTS OF THE PROGRAM AS THE ONBOARDING AND INTEGRATION PLANS TAKE PLACE. DURING THIS TRANSITION PERIOD, DECIEM IS REPORTING SEPARATELY FROM ELC FOR THE FISCAL YEAR ENDED JUNE 30, 2023.