

FY24 | Modern Slavery Report

ADOREBEAUTY
GROUP



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01. REPORTING AND CONSULTATION

This Modern Slavery Statement is accurately prepared by Adore Beauty Group Limited (ABN 78 636 138 988) and its Controlled Entities (together, 'the Group'), covering the period from 1 July 2023 to 30 June 2024 (FY24).

Throughout FY24, Adore Beauty engaged in consultation across our operations and supply chains, working closely with our owned and controlled entities to ensure a comprehensive understanding of our modern slavery risks and the measures we are putting in place to address them.

Our Modern Slavery Working Group, composed of senior executives from across the business and external compliance support, played a pivotal role in shaping this statement, bringing diverse insights and perspectives to the table.

Before finalising this statement, we invited feedback from our leadership team to refine our approach. The statement was then presented to the Board of Adore Beauty, who formally approved it on December 11th 2024.

References to 'our' and 'we' in this Statement are references to Adore Beauty Group Limited.



FROM THE CEO OF ADORE BEAUTY

As CEO of Adore Beauty, I'm pleased to share our FY24 Modern Slavery Statement, which showcases the steps we're taking to lead the beauty industry in ethical and responsible sourcing.

At Adore Beauty, our journey is about more than delivering premium beauty and wellness products - it's about making a real, positive difference in our industry and in our community. We believe that beauty should empower and uplift, and that starts with a commitment to ethical practices at every level of our business.

In FY24, we continued the important work of our Modern Slavery Working Group, launched tailored modern slavery training for our team, completed a comprehensive review of our trade partners and strengthened our responsible sourcing guidelines. By embedding values-driven practices across our operations, we're setting a high standard in the beauty sector, proving that beauty and responsibility go hand in hand.

During FY25, we're committed to take these commitments even further. We'll ensure full compliance with modern slavery laws, proactively adapting to any new reporting requirements, and reinforcing responsible sourcing wherever possible.

Our Modern Slavery Working Group will continue to focus on our high-risk areas, while we aim to strengthen partnerships with ethical suppliers and refine our onboarding processes - to ensure we're working with the best in the business.

We're expanding our dynamic, engaging training for team members and suppliers alike, equipping everyone to champion ethical practices. Alongside this, we're introducing responsible purchasing guidelines to ensure fairness and transparency in every transaction.

At Adore Beauty, we're passionate about building a trusted, values-led brand that celebrates beauty with integrity. We're here to set the standard for ethical practices in the beauty industry, inspiring others to join us in making a positive impact - one product at a time.



Sacha Laing
Chief Executive Officer

02. MODERN SLAVERY STATEMENT OVERVIEW

To comply with the Modern Slavery Act 2018 (Cth), Adore Beauty is required to address the following criteria in this modern slavery statement:

1. Identify the Reporting Entity

Adore Beauty must clearly identify the entities covered by this statement, including any subsidiaries or controlled entities. This has been done on page 2 of this statement.

2. Describe the Structure, Operations, and Supply Chains

A description of Adore Beauty's structure, operations, and supply chains is provided on page 5 of this statement.

3. Describe the Modern Slavery Risks

We must outline the specific risks of modern slavery practices within Adore Beauty's operations and supply chains. This has been done on page 8 of this statement.

4. Actions to Address Modern Slavery Risks

Adore Beauty is required to describe the steps we have taken to assess and address modern slavery risks. This has been done on page 14 of this statement.

5. Assessing the Effectiveness of Actions

We need to explain how we assess the effectiveness of the actions we have taken to address our modern slavery risks. This has been done on page 15 of this statement.

6. Describe the Process of Consultation

Our consultation process is described on page 2 of this statement.

7. Other Relevant Information

This has been included on page 19 of this statement as we have set out our goals for FY25.

03. MODERN SLAVERY HIGHLIGHTS AND ACHIEVEMENTS IN FY24

Adore Beauty is committed to creating a responsible and ethically driven business. Our FY24 highlights reflect our dedication to tackling our modern slavery risks head-on, advancing our commitment to human rights, and reinforcing our role as a leader in ethical practices within the cosmetics and wellness industry.

Modern Slavery Working Group: we established a dedicated group including compliance and sourcing staff with external support, meeting regularly to oversee and enhance practices.

Modern Slavery Training: we rolled out tailored training to equip all relevant staff to identify and mitigate modern slavery risks effectively.

Trade Partner Review: we completed a comprehensive review of trade partners, covering modern slavery statements, labour policies, and supply chain risks.

Ethical Sourcing Principles: we introduced a framework to guide responsible procurement decisions aligned with anti-modern slavery values.

Supplier Remediation Guidelines: we developed internal guidelines to proactively address and resolve supplier issues as they arise.

Modern Slavery Code of Conduct: we are in the process of implementing a Code for all our suppliers to reinforce ethical standards and commitment to preventing modern slavery.

Anti-Bribery and Corruption Policy: we prioritise transparency and fairness across operations and partnerships.

Enhanced Supplier Onboarding: we are developing a new onboarding process to assess suppliers' modern slavery policies, including stances on forced labour and living wage.



04. ADORE BEAUTY'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

4A. OUR STRUCTURE AND OPERATIONS

At Adore Beauty, we're redefining standards in the beauty industry, fuelled by our passion for quality and a commitment to exceptional sourcing and customer experiences.

Since launching in 2000 as a pioneering e-commerce site, we've evolved into a dynamic platform that seamlessly blends content, marketing, and retail. Today, Adore Beauty partners with a diverse portfolio of premium brands, offering thousands of products that connect our customers to the world's top beauty names.

With a dedicated team at our Northcote, Victoria head office and a directly managed fulfilment centre in Keilor Park, we ensure a seamless shopping experience. Our team is passionate about beauty and customer service excellence, supporting a loyal customer base across Australia and New Zealand with high engagement and retention.

Our supply chain spans Australia, the UK, China, France, Germany, Indonesia, Italy, South Korea, New Zealand, and the USA. Through a recent Trade Partner Review sent to over 300 of our brand representatives, we have gained valuable insights into our supplier network.

Our suppliers have indicated that they uphold strong anti-modern slavery policies, which align with our goal to collaborate with reputable businesses that prioritise responsible sourcing and maintain high ethical sourcing standards.

4B. OUR BEAUTY & WELLNESS PRODUCTS

Adore Beauty offers an extensive range of beauty, skincare, wellness, and personal care products, tailored for diverse needs and preferences. Their selection includes:

- **Skincare:** A variety of products to address different skin types and concerns, including cleansers, moisturisers, serums, and face masks, with options spanning luxury to clean beauty brands.
- **Haircare:** Products suited for various hair needs, such as shampoos, conditioners, treatments, and styling essentials. They also stock items like heat protectants and scalp care products for specialised hair routines.
- **Makeup:** A comprehensive range of cosmetics, including foundations, mascaras, eyeliners, blush, and lip products, featuring popular and premium brands.
- **Fragrance:** A mix of personal and home fragrances, from perfumes to candles and diffusers, offering both niche and luxury options.
- **Wellness and Lifestyle:** Products that support overall wellness, such as supplements, sleep aids, and gut health items, alongside essentials for personal care and menstrual hygiene.
- **Bath & Body:** A range of bath products, body lotions, scrubs, sunscreens, and self-tanning items for complete body care.
- **Oral Care:** Essentials like toothpaste, teeth whitening products, and electric toothbrushes, focusing on oral hygiene.

Adore Beauty offers a carefully curated range that meets diverse customer needs, from vegan and 'clean beauty' to specialised products for men and teens. Sourcing from Australian and international brands, our complex supply chain ensures high-quality, responsibly sourced products that align with our customers' expectations for ethical and inclusive options.

Some of the popular international brands sold by Adore Beauty include:

- **Skincare:** SkinCeuticals, Dermalogica, The Ordinary, SK-II, Clinique
- **Haircare:** Olaplex, Kérastase, Oribe, Redken
- **Makeup:** Estée Lauder, Lancôme, Huda Beauty
- **Fragrance:** Yves Saint Laurent, Viktor & Rolf, Versace, Narciso Rodriguez
- **Wellness and Lifestyle:** Ultra Violet, Therabody

Adore Beauty has also developed its own private label lines, including Viviology and AB LAB, which are manufactured in Australia. Our acquisition of the Australian brand iKOU further enhances our range of locally made products, featuring organic, cruelty-free skincare, body care, and wellness items.

Adore Beauty's private labels and Australian brands often focus on clean, sustainable, and cruelty-free standards, appealing to customers who prefer locally produced and ethically made products.



4C. SERVICES THAT SUPPORT ADORE BEAUTY'S OPERATIONS

As a leading cosmetics and wellness marketplace, Adore Beauty relies on a range of essential support services to ensure smooth operations across its head office and distribution network. Together, they help maintain Adore Beauty's efficiency and responsiveness, enabling the company to deliver a high-quality experience for its customers while upholding operational excellence across all functions.

The services we rely on include:

- **Freight and Logistics:** Coordination of goods transportation from suppliers, warehousing solutions, stock management, and timely delivery for our online orders.
- **Customer Service:** Dedicated support teams handling customer inquiries, order tracking, complaints, returns, and refunds to ensure a seamless shopping experience.
- **Cleaning and Waste Management:** Daily cleaning, maintenance, waste disposal, recycling, and sanitisation to maintain a safe and welcoming environment in all our physical premises.
- **IT and Technical Support:** Implementation and support for our IT systems, network security, and hardware/software solutions to keep our operations running smoothly.
- **Marketing and Advertising:** Comprehensive digital marketing, promotions and strategic advertising to elevate our marketplace presence.
- **Finance and Accounting:** Managing bookkeeping, financial reporting, payroll processing, tax compliance, and budgeting to maintain financial health.
- **Human Resources (HR):** Services covering recruitment, onboarding, payroll, superannuation, and adherence to workplace safety and Fair Work regulations.
- **Facilities Management:** Maintenance services for electrical, plumbing, system upkeep, general repairs, and car park management.
- **Supply Chain Management:** Vendor relations, inventory replenishment, distribution planning, and demand forecasting to keep our supply chain efficient and responsive.
- **Legal and Compliance Support:** Legal advice on contracts, intellectual property, business operations, and adherence to consumer protection and privacy laws.
- **Health and Safety Services:** Workplace health assessments, fire safety systems, first aid training, and emergency preparedness to prioritise the safety of our team and customers.
- **Security Services:** CCTV surveillance, alarm systems, and access control to ensure a secure working environment.
- **Training and Development:** Ongoing training for staff in areas like sales, customer service, compliance, and leadership to continuously enhance our team's performance.
- **Utilities and Sustainability Management:** Overseeing electricity, water, and gas supply, implementing energy efficiency practices, and promoting sustainability initiatives like waste management and recycling.

05. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Adore Beauty is committed to ethical sourcing and acknowledges the reported presence of modern slavery risks in the beauty and personal care industry. We recognise that certain regions, practices, and materials associated with our supply chains and operations may present heightened risks.

The following overview outlines the types of modern slavery concerns we are aware of and actively monitor across our product categories, as we strive to uphold ethical standards and transparency within our supply chains and operations.

PRODUCT RISKS

Our key product risk areas include:

1. High-Risk Geographic Regions

Many raw materials used in beauty and personal care products are sourced from regions where modern slavery risks are elevated due to weak labour regulations, poverty, and informal labour markets. These include:

- **India and Madagascar:** Significant sources of mica, often mined in rural areas where child labour and forced labour are prevalent. Children are frequently involved in dangerous mining work, with limited oversight and poor safety standards.
- **West Africa (Ghana, Ivory Coast):** Commonly associated with the production of cocoa and shea butter, both of which involve high risks of forced and child labour, especially in rural communities where subsistence farming and lack of economic alternatives drive labour exploitation.
- **Southeast Asia (Indonesia, Malaysia):** Major producers of palm oil and other botanicals used in cosmetics and personal care. The palm oil industry has been linked to forced labour, low wages, and poor working conditions, with reports of workers being subjected to debt bondage.
- **Morocco:** The main source of argan oil, a popular ingredient in haircare and skincare products. Here, harvesting and production are often done in remote areas with minimal regulation, where forced or underpaid labour is more likely.

2. Raw Material Extraction Risks

The extraction of raw materials is a critical risk point for modern slavery due to labour-intensive work often performed in isolated, rural areas. Key risks include:

- **Mica Mining (Makeup):** Mica provides a shimmering effect in cosmetics, but its mining is frequently associated with child labour in India and Madagascar. Children reportedly work in hazardous conditions for low pay, with minimal protection from the dangers of mining.
- **Palm Oil Harvesting (Skincare, Haircare):** Used widely in beauty products, palm oil is often sourced from Southeast Asia, where labour abuses, including debt bondage and forced labour, are reported. Workers may be trapped in exploitative conditions, working long hours in harsh environments.
- **Shea Butter and Cocoa Butter Extraction (Bath & Body):** Found in West African countries, shea and cocoa butter are core ingredients in lotions and body products. Both industries are heavily reliant on female and child labour, often under informal arrangements without fair wages or safe working conditions.

- **Vanilla and Essential Oils (Fragrance and Wellness):** Vanilla from Madagascar and essential oils from various countries are high-risk due to exploitative harvesting practices. In countries like Madagascar, workers in the vanilla industry may face forced labour and low pay, with little recourse to legal protections.

3. Complex, Opaque Supply Chains

Beauty products are made up of numerous ingredients, often sourced from multiple countries. This complexity leads to:

- **Increased Risk of Hidden Exploitation:** Multiple layers of suppliers (e.g., farmers, processors, wholesalers) make it difficult for companies like Adore Beauty to trace the origins of each ingredient, particularly in multi-component products like fragrances and cosmetics. As a result, exploitative practices in deeper supply chain tiers are harder to detect and address.
- **Limited Supply Chain Transparency:** In complex supply chains involving intermediaries, many smaller suppliers operate without regulatory oversight, increasing the likelihood of poor working conditions and labour exploitation, particularly in the early stages of production.

4. Dependence on Informal Labour Markets

Certain high-risk regions rely on informal labour markets, where workers, especially vulnerable populations like women and children, face exploitation:

- **Lack of Protections for Informal Workers:** Informal workers often lack contracts, stable wages, and basic rights. This is common in the harvesting of ingredients like cocoa, shea, and certain botanical extracts. Without formal labour protections, these workers are at greater risk of forced or bonded labour.
- **Social and Economic Pressures:** In rural areas, families may rely on child labour to supplement household income, increasing the risk of child exploitation in industries like mica mining or cocoa harvesting. The lack of economic opportunities in these areas drives families into exploitative labour arrangements.

5. Minimal Monitoring in Deeper Supply Chain Tiers

For Adore Beauty, deeper supply chain tiers represent the highest risks as smaller, local suppliers are less likely to undergo formal audits or regulatory scrutiny:

- **Rural and Remote Production Areas:** Ingredients like shea butter, argan oil, and various herbs may be produced in rural, isolated locations where regulatory oversight is limited or non-existent. This makes it difficult to ensure compliance with ethical standards.
- **Infrequent Audits and Lack of Certification:** Suppliers in these tiers may not have formal certifications or undergo regular audits, leaving labour conditions unchecked. As a result, forced labour and other unethical practices may go undetected.

6. Specific Product-Related Risks

Each product category at Adore Beauty faces unique risks, as follows:

- **Skincare and Makeup:** Ingredients like mica, palm oil, and certain botanical extracts are widely used. Mica mining in particular has a reportedly high prevalence of child labour in regions like India and Madagascar. Palm oil extraction in Southeast Asia has also been linked to forced labour and poor working conditions.
- **Haircare:** Popular ingredients like argan oil from Morocco and coconut oil from the Philippines and Indonesia carry risks associated with low-wage work and lack of formal labour protections. Packaging materials for haircare products also involve risks, especially when sourced from high-risk countries.
- **Fragrance:** Fragrances use multiple botanicals and extracts, including jasmine, sandalwood, and vanilla, sourced from high-risk regions such as India and Madagascar. The harvesting and distillation processes are labour-intensive and commonly lack oversight, raising risks of forced and underpaid labour.
- **Wellness & Lifestyle:** Ingredients like turmeric and other supplements come from regions like India, where informal labour markets are prevalent. The multi-layered supply chains for wellness products add complexity, making it difficult to trace ingredient origins and ensure ethical sourcing.
- **Bath & Body:** Shea and cocoa butter from West Africa are key ingredients in bath products. These ingredients are reportedly often sourced from rural areas with little formal employment, leaving workers vulnerable to exploitation.
- **Oral Care:** Products like toothpaste and electric toothbrushes contain components sourced globally. Flavourings and oils are sometimes sourced from high-risk regions, while the electronics in electric toothbrushes may involve supply chains with forced labour risks, particularly in electronics manufacturing hubs.

SERVICES-RELATED RISKS

Adore Beauty recognises that while Australia has strong labour laws that offer protections for workers, there are still potential modern slavery risks associated with specific service areas, particularly when services are outsourced or involve complex international supply chains. As a responsible business, Adore Beauty is committed to partnering with reputable service providers and suppliers who adhere to ethical standards.

The following outlines some of the risks we are mindful of in our operations, even as we strive to mitigate these through careful supplier selection and compliance with Australian labour regulations.



Freight and Logistics

Adore Beauty relies on a robust logistics network to import products and manage distribution. While Australia's labour standards provide strong protections, outsourced logistics and warehousing services, especially overseas, can be vulnerable to forced labour practices, with issues like low wages and excessive hours more common in high-risk countries. Adore Beauty prioritises partnerships with reputable logistics providers who comply with ethical labour standards.



Customer Service

Our customer service teams ensure a high standard of support for Australian and international customers. In Australia, workers are protected by comprehensive labour laws; however, outsourcing customer service to overseas locations can present risks of exploitative labour practices, such as forced overtime and inadequate wages. Adore Beauty seeks out established, ethical customer service partners, particularly for our offshore support, to minimise these risks.



Cleaning and Waste Management

The cleaning and waste management sector can involve subcontracted labour, including migrant workers who may face vulnerabilities. While Australian regulations mandate fair wages and safe conditions, risks of exploitation can be higher when these services are outsourced internationally. Adore Beauty relies on reputable cleaning providers to maintain safe and fair working conditions in our head office and warehouse locations.



IT and Technical Support

Adore Beauty's IT operations support our marketplace and ensure a seamless customer experience. Australia's strong labour protections reduce risks for local IT workers, though outsourcing technical support overseas can sometimes involve extended work hours and low wages in high-risk countries. We aim to work with well-established IT service providers who prioritise fair employment practices, both domestically and internationally.



Marketing and Advertising

Marketing and advertising activities may involve freelancers or contractors, who are protected under Australian labour laws. However, risks such as job insecurity and unpaid overtime can arise when relying on independent contractors in countries with less stringent protections. Adore Beauty ensures that any of our marketing partners adhere to ethical employment practices, regardless of location.



Finance and Accounting

Outsourced finance and accounting support, especially in overseas markets, may involve lower wages and long working hours. While Australia's labour laws safeguard workers in this sector, Adore Beauty remains vigilant if we work with overseas partners to ensure ethical practices, focusing on reputable financial service providers who comply with fair labour standards.



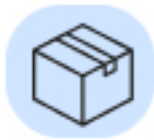
Human Resources (HR)

Recruitment and HR services can involve labour brokers in some regions, which may lead to exploitation through high recruitment fees and debt bondage. Adore Beauty is committed to fair and ethical recruitment practices, ensuring that any third-party HR providers align with our ethical standards, particularly when recruiting temporary or migrant workers.



Facilities Management

Facilities management, including maintenance and repair, can involve subcontracted labour. Australia's workplace protections reduce risks for local workers, but overseas maintenance services may not offer the same security. Adore Beauty works with trusted facilities management providers, upholding ethical standards for our Australian operations and any international suppliers.



Supply Chain Management

As part of our inventory and distribution activities, supply chain management roles, particularly in high-risk countries, may be associated with unsafe working conditions. Adore Beauty is dedicated to collaborating with suppliers who maintain high ethical standards and comply with fair labour laws, both within Australia and abroad.



Legal and Compliance Support

Legal and compliance roles generally carry lower modern slavery risks. However, when administrative support is outsourced internationally, there can be risks associated with low pay and long hours. Adore Beauty partners with established providers in the legal field who maintain fair labour standards.



Health and Safety Services

Health and safety services are crucial for maintaining safe work environments. In Australia, these roles are well-regulated, but in certain international contexts, subcontracted safety staff may face vulnerabilities. Adore Beauty prioritises working with reputable health and safety providers who uphold ethical standards in all locations.

Security Services

Security roles, particularly those sourced through third-party agencies, can present risks of low wages and long hours, especially for migrant workers. While Australia's regulations support fair wages, Adore Beauty remains diligent in partnering with reputable security providers to ensure ethical treatment of security staff when needed at our facilities.

Training and Development

Training roles, whether outsourced or local, benefit from Australia's strong labour laws. However, when contracting trainers in high-risk regions, there can be issues of job insecurity and inadequate pay. Adore Beauty works with credible training providers to ensure that fair employment standards are consistently met.

Utilities and Sustainability Management

In Australia, utilities and waste management workers are protected by comprehensive regulations. In regions with less oversight, workers in recycling or waste disposal can be at risk of exploitation. Adore Beauty ensures that our sustainability partners operate ethically, promoting fair treatment for all workers.



06. ACTIONS TAKEN TO REDUCE OUR MODERN SLAVERY RISKS

In FY24, Adore Beauty implemented several initiatives aimed at mitigating modern slavery risks within our operations and supply chain. These efforts have successfully enhanced compliance and transparency in our business practices. These concrete actions demonstrate our ongoing commitment to upholding ethical standards and contributing responsibly to the beauty and wellness industry.

1. Formation of a Modern Slavery Working Group

Adore Beauty has established a dedicated Modern Slavery Working, bringing together key compliance and sourcing staff with support from external experts. Meeting regularly, this group has played a pivotal role in driving improvements, keeping modern slavery risks top-of-mind, and fostering accountability across the business. The working group has increased awareness and responsibility among our teams, ensuring that modern slavery considerations are integrated into sourcing decisions and strengthening our reputation as an ethical industry leader.

2. Roll Out of Tailored Modern Slavery Training

In FY24, Adore Beauty introduced comprehensive modern slavery training for all relevant staff, equipping both new starters and current employees with the skills needed to identify and address modern slavery risks. This training empowered our team with a clear understanding of Adore Beauty's ethical standards and their role in upholding them, covering key topics such as recognising modern slavery, understanding why these risks matter, and knowing how various roles contributed to or mitigated these risks. Employees were taught to spot 'red flags' that might expose Adore Beauty to modern slavery risk, and were empowered to prevent, detect, and report any concerns. To support continuous learning, we also made modern slavery awareness videos and resources readily available, reinforcing each team member's role in ethical sourcing and compliance. This initiative was a cornerstone of our anti-slavery efforts, enhancing our reputation as a values-driven company committed to a responsible and transparent supply chain.

3. Comprehensive Trade Partner Review

In March 2024, Adore Beauty completed an extensive review of our trade partners.

We distributed the Trade Partner Review form to over 300 brand representatives and other suppliers across our network. However, as some of these representatives supply multiple brands, the actual number of unique suppliers is likely fewer than 300. So far, 79 suppliers have completed and returned the review form, with some larger suppliers directing us to their websites or modern slavery statements for compliance information.

By asking these questions, Adore Beauty will gain crucial insights into its supply chain, which will help us to ensure products we sell align with our ethical standards. This proactive approach has allowed the business to identify and address potential risks, build transparent partnerships with responsible suppliers, and reinforce our reputation as a brand that values integrity.

This review project has so far been both valuable and insightful. All responding first-tier suppliers indicated they are based in Australia, except for two located in the United Kingdom. When asked, 'What country do you source most of your products from?' suppliers identified Australia as the most common source, with additional sourcing from China, France, Germany, Indonesia, Italy, South Korea, New Zealand, the UK, and the USA.

The vast majority of our suppliers indicated that they have anti-modern slavery policies in place and provide contracts in a language their workers understand. As we continue following up and reviewing supplier feedback, further insights will help us establish processes to strengthen our modern slavery compliance program.

4. Established Formalised Responsible Sourcing Guidelines

In FY24, Adore Beauty finalised its comprehensive responsible sourcing guidelines, which will provide our procurement teams with a clear framework for making ethical choices daily. These guidelines will be instrumental in reducing the risk of partnering with unethical suppliers and building trust with our customers by ensuring that every supplier aligns with our values. This proactive step will strengthen our ability to mitigate modern slavery risks by embedding ethical expectations at the core of our sourcing process.

5. Developed Supplier Remediation Guidelines

In FY24, Adore Beauty developed draft Supplier Remediation Guidelines as an internal resource to address supplier issues quickly and effectively. These guidelines have enabled us to proactively manage compliance issues, supporting suppliers in their improvement efforts and fostering a collaborative approach to maintaining high standards. This initiative has strengthened supplier relationships and ensured that modern slavery risks are managed promptly and responsibly.

6. Implemented a Modern Slavery Code of Conduct

Adore Beauty introduced a Modern Slavery Code of Conduct, which we will ask all our suppliers to sign, affirming their commitment to ethical practices. This code solidifies Adore Beauty's stance against modern slavery and ensures that our suppliers share our dedication to preventing exploitation. Formalising these expectations has fostered a culture of accountability and transparency within our supply chain, creating stronger partnerships with suppliers equally committed to ethical practices.

7. Enhanced Supplier Onboarding Process

Adore Beauty is developing an enhanced supplier review process to collect detailed information on modern slavery-related policies, including stances on forced labour, fair wages, and freedom of association. We want every supplier to be ethically aligned from the start of our partnership, strengthening the integrity of our supply chain. By implementing these checks, we have set a high standard for supplier relationships and reduced the risk of unethical practices entering our operations.

07. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

At Adore Beauty, we are committed to upholding ethical standards and proactively managing any risks of modern slavery within our operations and supply chains. Our Modern Slavery Working Group plays a central role in driving this commitment, ensuring that our processes are robust, transparent, and effective in identifying and mitigating modern slavery risks associated with Adore Beauty's activities.

1. Supplier Engagement through Trade Partner Review

Our regular Trade Partner Review is a cornerstone of supplier engagement, allowing us to assess our suppliers' understanding and implementation of anti-slavery practices beyond basic compliance. By fostering open communication, we build mutual trust and accountability, helping to detect and address any emerging risks early. Monitoring our suppliers' commitment to Adore Beauty's modern slavery policies through these reviews provides valuable insight into their dedication to ethical sourcing, which is crucial for gauging the strength of our collaborative approach to combating modern slavery.

2. Transparent Reporting Mechanisms

Adore Beauty has implemented accessible reporting channels, including a customer care centre and a whistleblower process, for any modern slavery concerns. By tracking and reviewing these reports, we can identify recurring issues that might require systemic changes. This transparency ensures that employees, suppliers, and other stakeholders feel empowered to report concerns without fear of retaliation. Regular analysis of reported incidents helps us understand the effectiveness of our response mechanisms and identify areas where we may need additional focus or training.

3. Commitment to Staff Education and Engagement

Our tailored modern slavery training empowers employees to identify and mitigate modern slavery risks effectively. Adore Beauty's Modern Slavery Working Group monitors participation rates and conducts post-training quizzes to evaluate employees' understanding. High engagement and retention rates from these sessions provide measurable insights into the effectiveness of our training programs. By regularly assessing our staff's knowledge and preparedness, we ensure that they are equipped to contribute to a culture of ethical responsibility and respond to potential risks effectively.

4. Ongoing External Compliance Support

Adore Beauty collaborates with external compliance experts to bring in specialised knowledge and best practices in modern slavery risk management. These experts support us in refining our strategies and ensure alignment with current regulations. The external insights provided by compliance partners allow us to objectively assess and improve our processes. Their guidance on navigating emerging challenges provides us with an external perspective, highlighting areas where we excel and identifying potential gaps for continuous improvement.

5. Continuous Review and Improvement by the Modern Slavery Working Group

Our Modern Slavery Working Group conducts regular reviews of our practices to identify opportunities for improvement. This continuous assessment process ensures that our anti-slavery initiatives remain relevant and effective. By tracking and adapting our processes based on these reviews, we maintain an agile and proactive stance on modern slavery risk management. The group's ongoing oversight allows us to measure the effectiveness of our actions, helping us sustain a responsible, transparent, and ethically driven business approach.

6. Regular Supplier Documentation and Audit Reviews

We regularly review the quality of supplier documentation, including modern slavery statements, labour policies, and audit reports. Consistently complete and accurate documentation from suppliers is a positive indicator of their commitment to ethical practices. By examining these documents, we can assess if our suppliers are meeting Adore Beauty's expectations and identify any areas that require further intervention or support.

7. Analysis of Post-Audit and Remediation Outcomes

Following any supplier audits, we analyse the outcomes and, if needed, implement remediation plans to address areas of concern. Tracking improvements made by suppliers after remediation highlights the effectiveness of our follow-up actions. Successful remediation cases reinforce the impact of our standards and support initiatives, demonstrating our dedication to maintaining an ethical supply chain.

8. Monitoring Public and Media Sentiment

We regularly monitor public and media sentiment regarding Adore Beauty's ethical practices. Positive coverage or neutral sentiment around our modern slavery efforts suggests that our initiatives are resonating with the public, while any negative feedback may reveal areas needing improvement. This external feedback provides us with a broader perspective on the perceived effectiveness of our actions in mitigating modern slavery risks.

By combining these internal initiatives with external support and feedback mechanisms, Adore Beauty is well-equipped to assess the effectiveness of its modern slavery mitigation efforts.



08. MODERN SLAVERY PRIORITIES FOR FY25

Our goals and priorities for FY25 reflect Adore Beauty's commitment to ethical integrity and human rights, positioning the company as a responsible, forward-thinking leader that benefits both its operations and the cosmetics and wellness industry.

1. Ensure Legal Compliance and Accountability

Adore Beauty will ensure full compliance with modern slavery laws and reporting obligations, producing transparent reports, performing due diligence, and regularly reviewing policies to meet the highest standards. Adore Beauty will also stay informed on any legislative changes and adjust its practices as necessary, reinforcing a commitment to responsible sourcing. By staying ahead of regulatory requirements, we build consumer trust, protect the business from legal risks, and demonstrate to the industry that ethical compliance is both achievable and beneficial.

2. Foster a Culture of Vigilance and Responsibility

Adore Beauty's Modern Slavery Working Group will continue to meet regularly to assess risks, track progress, and foster a culture of accountability across the business. This group will focus on high-risk regions and products and will collaborate with industry initiatives to strengthen our approach. Through proactive oversight and regular training, Adore Beauty is creating an informed, vigilant workforce capable of making ethical decisions. Our commitment serves as a model for other companies, showing the importance of integrating human rights into daily operations.

3. Collaborate with Ethical and Trustworthy Suppliers

Adore Beauty will actively partner with suppliers who demonstrate a commitment to ethical sourcing and uphold human rights and environmental standards. By embedding modern slavery-related questions and requiring transparency about subcontractors, we ensure ethical practices from the outset. This proactive approach sets a high standard for supplier selection, inspiring others in the industry to adopt similar practices and fostering a culture where only high-integrity suppliers are chosen.

4. Enhance Supplier Onboarding Processes

Adore Beauty's onboarding process will include more rigorous evaluations of suppliers' labour practices, including their stances on forced labour, living wages, and freedom of association. This added due diligence serves as a protective measure, preventing unethical suppliers from entering the supply chain while reinforcing Adore Beauty's ethical standards. By demonstrating thorough vetting processes, Adore Beauty encourages other companies to implement more stringent onboarding practices.

5. Launch and Promote Updated Modern Slavery Training

Adore Beauty will work with our external compliance team to create engaging video and AI-based training, tailored to our diverse workforce. This training will cover supplier transparency, reporting responsibilities, and specific red flags to watch for, ensuring all employees are empowered to uphold our ethical standards. This initiative not only educates but also inspires, setting a new benchmark for employee engagement and education in the industry.

6. Empower Buying Teams with Ethical Sourcing Guidelines

Adore Beauty will implement comprehensive ethical sourcing guidelines for our buying teams, complete with practical training to bring these principles to life in day-to-day decision-making. This empowers our buyers to prioritise fair wages, safe working conditions, and ethical sourcing, strengthening supplier relationships and enhancing Adore Beauty's role as a responsible industry leader. These guidelines set an example for the industry, demonstrating that ethical sourcing can be a core part of procurement strategy.

7. Continue Our Comprehensive Trade Partner Review

Building on the success of our FY24 trade partner review, Adore Beauty will continue assessing trade partners for alignment with our Code of Conduct and Ethical Sourcing Principles. Given our large supplier base, this review process remains crucial for transparency and risk mitigation, allowing us to learn from the collected data. This ongoing review ensures that Adore Beauty's supply chain is held to high ethical standards, providing a transparent model for other businesses.

8. Provide Modern Slavery Awareness Training for Suppliers

Adore Beauty will offer free modern slavery awareness training for suppliers in English, Mandarin, and Vietnamese, helping them better understand ethical sourcing standards and obligations. By making this training accessible to all suppliers, we promote shared responsibility for ethical practices and contribute to a stronger, more aligned supply chain.

9. Launch Responsible Purchasing Guidelines

Adore Beauty will further implement responsible purchasing guidelines that prioritise fair pricing, realistic lead times, and transparent contracts. These guidelines aim to prevent last-minute changes that can pressure suppliers into exploitative practices. By setting fair and transparent purchasing standards, we strengthen supplier relationships and reduce the risk of labour abuses. This approach demonstrates to the industry that ethical considerations can align with business goals.

10. Promote Transparency and Human Dignity Throughout the Business

Adore Beauty will foster a workplace environment that prioritises human dignity, sustainable sourcing, and transparency in all business dealings. This commitment extends from internal operations to every supplier interaction, reinforcing our role as a leader in ethical sourcing. By publicly committing to these values, Adore Beauty sets an example for the cosmetics and wellness industry, encouraging other companies to adopt similar principles and champion human rights in their practices.

These goals for FY25 reflect Adore Beauty's dedication to reducing the risks of modern slavery, building a responsible supply chain, and setting a high standard for integrity within the cosmetics and wellness industry.