

Sephora Australia - Modern Slavery Act statement

Introduction

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) ("Modern Slavery Act") and sets out the steps Sephora Australia Pty Ltd (ACN 169 030 737) ("SEPHORA AUSTRALIA") has taken during its financial year ending 31 December 2023 to assess and address the risks of slavery, servitude, forced or compulsory labour, debt bondage, deceptive recruiting, the worst forms of child labour, forced marriage or human trafficking (collectively, "Modern Slavery") taking place in any part of its business or supply chains.

Our Entity, Structure, and Operations

SEPHORA AUSTRALIA distributes make-up, skincare, fragrance, haircare and other beauty related products, tools and accessories to retail customers and consumers in Australia.

SEPHORA AUSTRALIA is a subsidiary of Sephora SAS, which is part of the global Louis Vuitton Moët Hennessy ("LVMH") group. SEPHORA AUSTRALIA does not own or control any entities (it does not have any subsidiaries).

SEPHORA AUSTRALIA has over 650 employees located in Australia and New Zealand including permanent, fixed term and casual employees with its head office in Australia being located in 32 Martin Place, Sydney NSW.

SEPHORA AUSTRALIA takes active steps to ensure all its employees' working conditions are within the law. Employees are only hired if they have existing work rights, for example, by virtue of being citizens, permanent residents or on a visa which allows them to work, meaning that all employment relationships are properly documented.

Supply Chain Relationships

SEPHORA AUSTRALIA's products and packaging purchases are mainly sourced from the following:

- (i) Finished Goods Products including but not limited to make-up, skincare, fragrance, haircare and other beauty related products, tools and accessories from suppliers located in United States, France, Italy, United Kingdom and Australia; and
- (ii) Cartons for eCommerce Packaging Material from suppliers located in various countries including Malaysia and Australia.

SEPHORA AUSTRALIA's largest supplier is in France, a country with stringent labour laws and minimum wages. The second largest tier one supplier of SEPHORA AUSTRALIA is in the United States, a country that also has minimum wages laws. Suppliers located in these two countries comprise approximately sixty percent of Sephora's total tier one supply sources.

However, SEPHORA AUSTRALIA is conscious that as a retail store with products being supplied from a range of tier one suppliers, it can be challenging to monitor the supply chains of those tier one suppliers. This may present potential modern slavery risks. For this reason, SEPHORA AUSTRALIA has implemented a Suppliers' Code of Conduct in place, as set out in more detail below.

Policies and Practices

SEPHORA AUSTRALIA's commitment is to act with integrity in all its business dealings and to promote ethical conduct, to enhance compliance with applicable laws and to provide guidance with respect to business conduct. It has a number of policies that are relevant to this commitment, which set out what SEPHORA AUSTRALIA expects from both its internal business and its external suppliers.

Relevant policies include:

1. SEPHORA AUSTRALIA Suppliers' Code of Conduct ("Suppliers' Code of Conduct")

SEPHORA AUSTRALIA expects its suppliers to share its commitments and act in full compliance with the law, including all national, local and international laws relating to the management of their businesses. Suppliers are provided with a copy of the Suppliers' Code of Conduct when they first sign on as a supplier for SEPHORA AUSTRALIA as well as at the re-contracting stage, which occurs approximately every 3 years. It is made clear that suppliers are expected to comply with the Suppliers' Code of Conduct and that SEPHORA AUSTRALIA reserves the right to terminate a supplier relationship in the event that any non-compliance is discovered.

The Suppliers' Code of Conduct sets out a number of labour standards and social responsibilities which it requires its suppliers to comply with/exhibit. These include the prohibition of child labour, forced labour, illegal, clandestine and undeclared employment, harassment and abuse and discrimination. Suppliers are also required to guarantee the payment of at least minimum wages, compliance with legal requirements around working hours, respect for freedom of association and providing a safe and health workplace environment.

The Suppliers' Code of Conduct puts suppliers on notice that if SEPHORA AUSTRALIA becomes aware of any breach of the Suppliers' Code of Conduct, SEPHORA AUSTRALIA reserves the right to terminate its relationship with that supplier. The Supplier's Code of Conduct is available upon request.

2. LVMH Code of Conduct

The LVMH Code of Conduct reiterates the commitment of each of the companies in the LVMH group (including SEPHORA AUSTRALIA) to act to the highest standards of integrity, respect and engagement in their behaviours and in the way that they conduct business every day, everywhere.

This code further states that the group companies, including SEPHORA AUSTRALIA, will inform all of its commercial partners of its ethical principles and expectations and will ask its suppliers to comply with the principles set out in the Suppliers' Code of Conduct. In particular, this code specifies compliance with social issues under the following relevant sections "Implementing and promoting a responsible approach" and "Acting as a socially aware company" in particular when it comes to respecting and supporting human rights.

The LVMH Code of Conduct is circulated to each SEPHORA AUSTRALIA employee. The Suppliers' Code of Conduct is made available to each SEPHORA AUSTRALIA employee who works in Operations and Supply Chains (i.e. who works closely with SEPHORA AUSTRALIA's suppliers). Both codes are available at all times on the SEPHORA AUSTRALIA document management system (shared drives etc.).

Supplier Due Diligence

Prior to engaging any new contractual relationship with a supplier, SEPHORA AUSTRALIA requires the prospective supplier to acknowledge that it will comply with the Suppliers' Code of Conduct.

SEPHORA AUSTRALIA reserves the right to check adherence of its suppliers to the principles set out in the Suppliers' Code of Conduct and to conduct compliance audits at any time without notice. Upon reasonable request, SEPHORA AUSTRALIA suppliers shall supply the necessary information and grant access to SEPHORA AUSTRALIA representatives to verify compliance with the requirements of this code. Suppliers shall further keep proper records to prove compliance with this code and provide access to complete, original, and accurate files to SEPHORA AUSTRALIA representatives.

Upon reasonable request, SEPHORA AUSTRALIA suppliers must improve and correct any deficiency discovered during any such audits.

SEPHORA AUSTRALIA shall use its best endeavours to ensure that all SEPHORA AUSTRALIA supplier template contracts contain clauses requiring SEPHORA AUSTRALIA suppliers to comply with the Supplier's Code of Conduct including adopting similar anti-slavery standards and practices.

Training and Awareness

SEPHORA AUSTRALIA conducts regular training for its employees to ensure legal and human resources compliance across SEPHORA AUSTRALIA. The training enables SEPHORA AUSTRALIA to reduce business risk of non-compliance through efficient processes and reliable data and reporting.

It is mandatory for all SEPHORA AUSTRALIA employees engaged in the supply chain to familiarise themselves with the Modern Slavery Statement upon its distribution. The Modern Slavery Statement and LVMH Code of Conduct form part of the induction process for new employees and are available in English. The Modern Slavery Statement, along with the LVMH Code of Conduct, are made readily available and all employees are directed at this time to familiarise themselves with the Modern Slavery Statement and the LVMH Code of Conduct and ask any questions they may have in relation to either the Modern Slavery Statement or the LVMH Code of Conduct.

SEPHORA AUSTRALIA's aim is to eliminate any risk of Modern Slavery in its business operations and in its supply chains.

Remediation

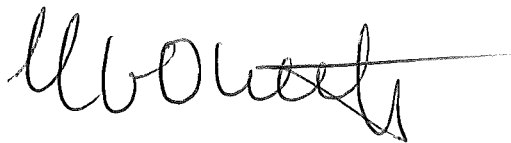
SEPHORA AUSTRALIA is committed to investigating any report of potential incidences of modern slavery occurring anywhere in its operations or supply chains and would take all appropriate steps to rectify any confirmed incidences of modern slavery in its operations or supply chains. SEPHORA AUSTRALIA would work collaboratively with its suppliers and, if necessary, their suppliers, to achieve these goals. If, for any reason, progress in this regard was not possible, SEPHORA AUSTRALIA would, as indicated above, take steps to sever its connections to the offending supplier or sub-supplier.

Effectiveness of actions taken to assess and address modern slavery risks

SEPHORA AUSTRALIA recognizes that in order to identify and address the risks of modern slavery in our operations and throughout our supply chain, we must continually analyse and evaluate our actions. SEPHORA AUSTRALIA is committed to advancing this process. We will keep working to build structures and procedures, and ensure commitment to our policies, so that we can evaluate the efficacy of the steps we are taking to identify and address the risks of modern slavery in our supply chains and operations.

This statement is prepared in accordance and compliance with section 13 of the Modern Slavery Act and constitutes SEPHORA AUSTRALIA's modern slavery statement for the financial year ending 31 December 2023.

This statement was approved by the Board of Directors of SEPHORA AUSTRALIA on 15 April 2024 and is signed by a Director of SEPHORA AUSTRALIA.

A handwritten signature in black ink, appearing to read 'Mark O'Keefe', with a long horizontal stroke extending to the right.

Signed by Mark O'Keefe on 15 April 2024

Director of SEPHORA AUSTRALIA