

# ELEMIS

LONDON

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION

This statement sets out ELEMIS Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. ELEMIS have a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### ORGANISATION STRUCTURE

We are a part of a multinational group of companies that operate around the world. Our principal business is the distribution and supply of the ELEMIS range of skincare products.

### SUPPLY CHAINS

We have supply chains that exist to support the production and manufacture of our products as well as networks that deal with the transportation of our products, and the operation of spas and retail stores.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **RIGHT TO WORK.** Our policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. **REPORT LINE.** This ensures all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. **CODE OF BUSINESS CONDUCT AND ETHICS.** This code explains the manner in which we behave as an organisation and how we expect our employees to act.

### DUE DILIGENCE PROCESS

We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes regular meetings with partners and stakeholders; an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and audits which include a review of working conditions.

### TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to the relevant members of staff.

### COMPLIANCE

The Directors are responsible for monitoring compliance with our Modern Slavery and Human Trafficking Policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement for the financial year ending 31 March 2022. This statement was approved by the Board of Directors of ELEMIS Limited on 4<sup>th</sup> August 2021.

Oriele Frank  
Co-Founder & Chief Product and Sustainability Officer  
ELEMIS LTD

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