

**UK Modern Slavery Act
Statement 2024**

L'ORÉAL
UK & IRELAND

Our Commitment To Ethics And Human Rights

L'Oréal Groupe's human rights policy is built on the four Ethical Principles in our Global Code of Ethics: Integrity, Respect, Courage, Transparency.

L'Oréal Groupe has a **zero-tolerance policy** regarding any type of forced labour, including modern slavery.

This statement summarises what L'Oréal (UK) Limited ("L'Oréal UK") has done to prevent modern slavery and human trafficking from 2016 – 2024 and outlines the steps taken during the year ending December 2024. It responds to the Modern Slavery Act 2015 and is approved by L'Oréal UK's Board of Directors.

This statement focuses on the L'Oréal UK business and should be read in conjunction with L'Oréal Groupe's global public reporting and universal registration document that covers additional topics outside the scope of L'Oréal UK's organisation, including the sourcing of ingredients and packaging materials.

Our Organisation's Structure, Business and Supply Chains

- L'Oréal groupe is the world's largest beauty company, registered at 14 Rue Royale, Paris, France.
- L'Oréal groupe are present in 150+ countries and employ 90,000+, employees.
- L'Oréal groupe produce skin care, cosmetics, hair care, hair colour, fragrances, sun care and men's grooming products.

L'Oréal UK is a wholly owned subsidiary of L'Oréal SA and is part of the L'Oréal Groupe. The L'Oréal Groupe operates as a global business, replicated at regional and local levels. The L'Oréal Groupe governance structure maintains a cohesive global business based on the strong Ethical Principles.

At L'Oréal UK, our employees work in many roles covering various functions including sales, marketing and operations. L'Oréal UK employs beauty advisors in department stores and stand-alone boutiques across the UK. Across the globe, L'Oréal Groupe produces products in 37 plants (none located in the UK). L'Oréal UK follows the Integrated Production Model established by the L'Oréal Groupe. This model means that products are manufactured in factories operated and managed by L'Oréal SA, while local distribution is handled through the UK distribution centres.

Concretely, this means that the L'Oréal Groupe relies on direct (tier one) suppliers worldwide for raw ingredients which are purchased by other L'Oréal companies outside the UK. For that reason, the sourcing of individual ingredients is outside the scope of this report.

L'Oréal UK works with more than 850 direct (tier one) suppliers for other products and services. For example, this includes suppliers of temporary staff, event management and local in-store marketing materials.

Governance

Human rights are embedded in L'Oréal's governance structure.

Human rights are central to our governance. L'Oréal Groupe's Chair and CEO support our commitment to human rights and the global Board of Directors ensures we follow our ethical principles and Code of Ethics.

The global Chief Corporate Responsibility Officer, a member of the Executive Committee, is responsible for overseeing the respect of human rights and fundamental freedoms within L'Oréal Groupe. This mission has been entrusted to them by L'Oréal Groupe's Chair and CEO, to whom they report. The Chief Corporate Responsibility Officer has a budget and a dedicated team of Human Rights experts. They rely on L'Oréal Groupe's teams and resources to carry out their work.

The Human Rights Committee, chaired by the Chief Corporate Responsibility Officer and composed of representatives of the various activities, functions and geographic areas (including Purchasing, HR, CSR, Safety, Security, etc.), allows coordination and exchange across L'Oréal Groupe regarding its Human Rights policy. Its primary objective is to enable the promotion of a human rights culture within L'Oréal Groupe.

At a country level, Country Managers, supported by Human Resources teams locally, are responsible for promoting a culture of respect for human rights and fundamental freedoms.

Each country including the UK, has an **Ethics Correspondent** who supports the corporate functions and acts as a local point of contact for

all ethics-related questions from employees. Employees, as well as all other stakeholders, can use the L'Oréal Speak Up website as a secure mechanism for raising concerns directly with their Ethics Correspondent.

Since 2020, each market has a **Human Rights Correspondent**. The Human Rights Correspondent reports on human rights issues and supports local management coordination, with the help of the Global Human Rights Team.

Employees may contact their manager, their Human Resources Director, their General Counsel, their Purchasing Director, their Human Rights Correspondent, their Ethics Correspondent and, ultimately, the Global Ethics and Human Rights Departments if they have any questions about compliance with the Applicable Rules. Further information about L'Oréal Groupe's "Applicable Rules" can be found via the: [2024 Vigilance Plan](#)

Our Policies

L'Oréal Human Rights Policies

L'Oréal Groupe **published its first Human Rights Policy in 2017**. This document is designed to share L'Oréal Groupe's commitment around Human Rights issues with consumers, stakeholders, and other interested groups. It also shares how the Groupe's commitment is respected in practice. The policy was communicated to L'Oréal UK employees twice in 2024.

The L'Oréal Groupe approach to the development of the Human Rights policy is based on internationally recognised standards, namely the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the ILO Core Conventions that address child labour, forced labour, non-discrimination and the right to freedom of association and collective bargaining. Further information about the L'Oréal Groupe's Human Rights Policy can be found at:

[Human Rights Policy](#)

L'Oréal Groupe Employee Human Rights Policy

In 2020, L'Oréal Groupe launched a specific policy on Employee Human Rights that undertakes to respect a base of universal Human and Social Rights for its employees, regardless of their position or location in the world.

L'Oréal Groupe's Employee Human Rights Policy has been developed with input from internal and external stakeholders, including the Danish Institute for Human Rights and experts from the United Nations.

The L'Oréal Groupe ensures that all employees worldwide receive a living wage of at least the minimum salary set by local law or the applicable collective agreements. A living wage should cover their basic needs, calculated in line with best practices.

The policy establishes concrete standards for topics ranging from the freedom of association and the prohibition of forced labour to freedom of expression and universal paid vacation.

Further information about the Employee Human Rights policy can be found at:

[Employee Human Rights Policy](#)

L'Oréal Code of Ethics

L'Oréal Groupe Code Of Ethics ('The Way We Work') Is Currently Available In 30 Languages

This code of ethics is the reference document that brings L'Oréal Groupe's ethical principles into the daily professional lives of every employee. It applies to all employees of the L'Oréal Groupe and its subsidiaries worldwide. Each employee has access to the digital version of the code. This code, in addition to other information about our ethical principles, is available online at:

<https://www.loreal.com/group/governance/acting-ethically.aspx>

Bringing Ethics To Life – Internally And Externally

Ethics Day:

Internally, L'Oréal Groupe has held an annual global 'Ethics Day' since 2009. The day enables employees across the world to ask questions of the Groupe's CEO about the application of the company's ethical principles (including on human rights). Global Ethics Day is followed by a live L'Oréal UK Ethics Day, hosted by the UK's Country Manager and Ethics Correspondent. In 2024, they answered 22 live ethics-related questions from employees during an hour-long broadcast.

Ethics and related topics are communicated throughout the year, including spotlights on the Speak Up platform. The Speak Up platform allows L'Oréal Groupe employees and stakeholders (external staff, employees of providers or subcontractors, suppliers, clients, consumer, shareholders and representatives of civil society) to raise any serious ethical concerns for resolution.

Reports made via this platform will be received by L'Oréal Groupe's Office of the Chief Ethics Officer.

Ethics and human rights policies help L'Oréal UK employees understand how to escalate any concerns through their local Ethics Correspondent. Employees have access to a dedicated internet site, which provides additional information on ethics, including human rights. All communications on these policies are sent via our Country Manager and amplified across all relevant internal channels.

L'Oréal UK is committed to transparent exchange with its employees. In addition to annual Ethics Days, L'Oréal UK holds business updates for all employees twice a year, with a dedicated ethics-related Q&A session, as part of its Country Manager town halls.

Externally, L'Oréal Groupe has invested considerable resources in sharing its Ethics programme and how it is implemented, via its corporate website.

Rules to Prevent Human Rights Abuses

L'Oréal Groupe has outlined the rules relating to potential Human Rights abuses in our Universal Registration Document. All subsidiaries (including L'Oréal UK) and all suppliers (including those based in the UK and/or supplying to L'Oréal UK) are responsible for complying with the following minimum common core rules.

Since 2002, the L'Oréal Groupe's suppliers have had to sign the Mutual Ethical Commitment Letter (MECL). This document was reviewed in 2021. The letter made public the Groupe's requirements and commitment of its suppliers, in line with its global ethics, corporate responsibility, human rights and compliance programmes and policies. This document covers human rights, working conditions, environmental stewardship and business integrity. It also covers how our business partners can use L'Oréal Speak Up, our whistle-blowing system, if they feel that the company is not living up to its own high ethical standards.

Abolition of Child Labour:

L'Oréal Groupe has chosen to set a compulsory minimum hiring age of 16 for all staff; a minimum age which is higher than that required by Conventions no.138 and 182 of the International Labour Organisation (ILO). All L'Oréal Groupe subsidiaries and suppliers are required to check the age of all new employees upon hire. L'Oréal Groupe prohibits the use of night-time work and hazardous work to employees under 18 and asks its suppliers to do the same.

Elimination of Forced or Compulsory Labour:

L'Oréal Groupe refers to the definition of forced and compulsory labour as outlined in Convention no.29 of the ILO. Forced and compulsory labour is defined as *'All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered them-self voluntarily.'* All forms of forced labour carried out under physical constraint or threat are prohibited.

Consequently:

- Security personnel must only ensure the safety of persons and property;
- Unless there is a legal obligation, employees' identity papers, passports or any other personal documents cannot be taken from them. In the event of a legal obligation, the documents must be returned to the employee at their first request;
- Recourse to prison labour is possible when it is voluntary, within the scope of a professional reinsertion programme, and paid at the market rate. Suppliers must request authorisation from L'Oréal Groupe before they have recourse to this type of labour.

Additionally, at L'Oréal Groupe, any salary deduction must be authorised by law. Deductions cannot, in any circumstances, be used for the purposes of confiscation, or for the director in direct benefit of the employer. In addition, employees cannot be asked to pay for recruitment costs or to make cash deposits to obtain employment.

Rules to Prevent Human Rights Abuses

Freedom of Association:

Employees' rights to freedom of association and collective bargaining must be respected. Employee representatives must be elected without employer interference and be provided access to work premises subject to safety and/or confidentiality requirements. Employees involved in union activities may not be discriminated against. In countries where freedom of association and the right to collective bargaining are limited or forbidden, L'Oréal Groupe encourages the development of other forms of expression and dialogue with employees to enable them to express their concerns.

There are also detailed rules for non-discrimination, working hours, sexual and moral harassment.

Further details can be found in our [Applicable Rules on Human Rights](#) (p157)

Other Policies Relating to Modern Slavery

In addition to the Code of Ethics, L'Oréal Groupe has several ethics-related policies and processes. This policy architecture supports our work to identify, mitigate and remediate any situations of modern slavery. A foundational process is our social audit programme, which provides a way of assessing and tracking risk. We appreciate that while social audits can provide helpful insight and a snapshot of the risks, they are only part of the solution.

A snapshot of the key policies relating to human rights and modern slavery is shown below.

L'Oréal Groupe also recognises the need to hear the perspectives of people who have been potentially affected by these issues. It is important that the Groupe hear both from our own employees and those throughout our supply chain.

For our own employees, the Groupe can hear any concerns through our ethics outreach (including our global and local Ethics Day activities) and other channels including Human Resources. The Groupe conduct worker interviews as part of our supplier audits in addition to regular stakeholder forums to hear concerns from our supply chain.

Policy	Commitment
The L'Oréal Spirit	This sets out the ethical commitment made by L'Oréal Groupe , its senior management and all its employees to act ethically and responsibly. As a responsible employer, we commit to securing employee health, safety, security and privacy; supporting diversity; and preventing sexual and moral harassment. We also have a L'Oréal Groupe-wide commitment to the abolition of child labour and forced labour and to actively seek out and favour business partners who share our ethical standards. The L'Oréal Spirit is displayed at entrances and meeting rooms in the UK.
L'Oréal For The Future	In line with our L'Oréal for the Future commitments, the L'Oréal Groupe has committed that by 2030, 100% of the L'Oréal Groupe's strategic suppliers' employees will be paid at least a living wage covering their basic needs and those of their dependents, calculated in line with best practices.
The Way We Work With Suppliers	This is a practical guide to L'Oréal Groupe's ethical purchasing standards and is designed to help employees manage suppliers. The Purchasing Department has worked hand-in-hand with the Office of the Chief Ethics Officer to create this guide for all staff when dealing with suppliers.
Mutual Ethical Commitment Letter	In 2021, L'Oréal Groupe also published its Mutual Ethical Commitment Letter to make public the Groupe's requirements and commitment to its suppliers, in line with its global ethics, corporate responsibility, human rights and compliance programs and policies. This document covers human rights, working conditions, environmental stewardship and business integrity, including information on how our business partners can use our whistle-blowing system, L'Oréal Speak Up, if they feel that we are not living up to our own high ethical standards.

Policy	Commitment
Suppliers' Child Labour Policy	This outlines L'Oréal Groupe's policy for the prevention of child labour with respect to suppliers (and subcontractors).
L'Oréal Buy & Care Programme	This was launched in 2002 and provides guidance on how to embed social, ethical and environmental concerns within the L'Oréal Groupe supply chain. L'Oréal Groupe asks its suppliers and subcontractors to comply with the Fundamental Conventions of the ILO as well as local legislation.
Purchase Commitments & Order Management	This aims to facilitate and strengthen L'Oréal Groupe control over the spending and investments.
General Terms of Purchase	The general terms of purchase, which include a requirement that goods and services supplied are not manufactured or sourced using forced labour.
L'Oréal Speak Up	L'Oréal Groupe's whistle-blowing policy (Speak Up) explains when and how L'Oréal employees, external staff and other stakeholders, can make a confidential Speak Up report about any grievances, areas of concern or areas for improvement. No Speak Up reports were handled by L'Oréal UK relating to forced labour in 2024. The Way We Work With Our Suppliers Policy Group Speak Up Policy

Evaluation and Terms of Contract

Terms of Contract:

L'Oréal UK's suppliers are expected to work to the company's Terms and Conditions of Supply of Goods and Services. This includes requirements that the goods shall “*not be manufactured or sourced using forced prison (except where under reintegration programmes during sentence, paid at market rate and with the prior written consent of the customer), and dangerous or concealed labour involving children under the age of 16 years' old*”. They must also comply with the Fundamental ILO Conventions on freedom of association, the abolition of forced labour, equality and the elimination of child labour.

L'Oréal UK's purchasing team has the task of identifying new suppliers and recruiting them through the Welcome on Board (WOB) process. This process gives suppliers the necessary information to understand L'Oréal UK's expectations and processes.

The first objective is to obtain the supplier's commitment to our values. **This is done through sharing our expectations relating to Human Rights and the signing and submission of L'Oréal Groupe's Mutual Ethical Commitment Letter (MECL).** This letter covers suppliers of raw materials, packaging components, contract manufacturing and point of sale/ promotional materials.

Due Diligence Risk Assessments

L'Oréal Groupe recognises the need to consider non-financial risks including respecting human rights, promoting sustainable use of resources, minimising negative impact, minimising brand damage and the need for good human resource management.

Risk assessment with regards to human rights is based on the indicators of the **Verisk Maplecroft Index**. This index enables Country Managers to assess any local ethical risks (including human rights). This data is shared with appropriate corporate departments for inclusion in their own risk assessments so they can adopt relevant policies and procedures.

Since 2019, all subsidiaries, including L'Oréal UK, have carried out an annual ethics self-assessment.

An annual ethics reporting system enables group companies to share local data regarding the implementation of L'Oréal Groupe's Ethics programme. Potential areas for improvement are identified on a country-by-country basis and countries are then responsible for implementing measures to address any potential areas for concern.

L'Oréal UK's regular employee survey (Pulse Survey) asks several key questions in relation to ethics. For example, staff's perception of their ability to report instances of unethical behaviour.

Social Audits:

In addition, an assessment of actual and potential human rights risks **in our UK operations** are currently driven by regular social audits conducted in the UK at all three of our distribution centres.

As part of the 2024 social audit, no incidents of forced or compulsory labour, or child labour, were identified for L'Oréal UK's own operations.

Risks in the global operations and supply chains are currently managed via social audits, which are led by the Purchasing Departments in each individual country. A social audit must be carried out for suppliers with whom L'Oréal Groupe has a direct relationship:

Key raw material suppliers in HIGH-RISK countries:

- All component suppliers in HIGH-RISK countries.
- All sub-contractors and contract manufacturers in ALL countries.
- All industrial equipment suppliers in HIGH-RISK countries.
- All Point of Sale / Promotional material suppliers in HIGH-RISK countries.
- All Point-of-Sale services providers (Co-packers) in ALL countries.
- All cosmetic electronic device providers in HIGH-RISK countries.

Our Social Audit Process

Social audits are carried out by a specialised, independent auditing firm, and are conducted in the local language.

Audits are conducted against L'Oréal Groupe's General Terms of Purchase and Payment, and the SA8000 Social Accountability Standard. This includes 10 labour rights issues, including forced and compulsory labour.

In 2024 alone, L'Oréal Groupe conducted 1,147 social audits.

Since 2002, our buyers have been implementing our responsible sourcing policy known as the 'L'Oréal Buy & Care' programme. Buyers assess and select suppliers, considering: quality, service level, innovation, sustainability and competitiveness. 'Strategic' suppliers are suppliers whose added value is significant to L'Oréal Groupe because of their contribution to the Groupe's strategy through their size, innovations, shared goals and geographical representation.

Suppliers' Corporate Social Responsibility commitments are reviewed during the assessment of a prospective supplier's sustainability commitments and when analysing a supplier's viability to support our Inclusive Sourcing programme. When appropriate, eligible suppliers are also subject to social audits.

Human rights due diligence is also considered during the key stages of our business activities – such as acquisitions and new partnerships. Responses to the ethics and human rights questionnaire, submitted to target companies, are intended to identify whether the risks related to a potential failing in the respect of human rights (namely child labour and forced labour) has been considered by these companies.

In line with previous years' commitments, L'Oréal Groupe revised the internal risk assessment process for human rights across the company's own operations and supply chain.

The revised social audit process has been extended to cover a greater number of suppliers; has an updated list of high-risk countries (using the Verisk Maplecroft database); and contains an updated and broader range of questions (including on the topics of child labour, forced labour and hours of work). A global database has also been introduced to facilitate the audit process.

1,147

**L'Oréal GROUPE SOCIAL
AUDITS IN 2024**

Acting on Risks

Potential issues revealed during the audit process result in a Corrective Action Plan (CAP), which is reviewed by our suppliers before the auditors leave.

Audits are given a rating by the external auditors of 'Satisfactory', 'Needs Continuous Improvement', 'Needs Immediate Action' or 'Zero Tolerance'. Purchasing teams must follow upon the implementation of all CAPs by suppliers.

Sites rated 'Zero Tolerance' must immediately halt production and are subject to a follow-up audit. The follow-up audit, which is paid for by the supplier, must be rated either 'Satisfactory' or 'Need Continuous Improvement' for trade relations and production to resume.

The Purchasing team aligns with the Corporate Sourcing Director, before any resumption of production takes place.

Please see the rating matrix for examples of non-compliant behaviours.

In the UK, two Social Audits resulted in CAPS in 2024.

FACTOR	Zero Tolerance	Need Immediate Action	Need Continuous Improvement
Child Labour	- Workers under 16 years old, with no waiver. - Waiver conditions not respected.	- No efficient system (ID with photo) to check age. - Child labour found in last 12m and no efficient system now in place. - Non-compliance of local law on minimum working age (if >16y). - For young workers (16-18y), non-compliance with relevant local laws (e.g. heavy work, night shifts).	- System in place but records are incomplete (max 25% sample) regarding recent hires (<3y). - For young workers (16-18y) non-compliance of relevant local laws (e.g. heavy work, night shifts).
Forced Labour	- Non-volunteer prisoners, bonded or indentured labour. - No respect of basic rights (e.g. rest room and water breaks prohibited or unnecessarily restricted, work under guard surveillance).	- Volunteer prisoners are not paid at market rate or not paid overtime. - Employees are not free to leave the workplace at the end of the shift (e.g. compulsory overtime when not authorised by local laws). - Requirements set by the employers that affect workers' freedoms (e.g. monetary deposits, wage retention, ID card retention –when not mandatory by local laws).	

Training Related to Modern Slavery

L'Oréal Groupe provides a range of internal training courses for all employees around ethical behaviour and ethical purchasing.

When a new employee joins L'Oréal Groupe, they must complete a compulsory ethics e-learning course covering human rights, as part of their induction process. This course has been mandatory for all employees since 2014.

A new version of the compulsory Ethics and Human Rights e-learning was rolled out across L'Oréal UK. As of 31st December 2024, 88.5% of L'Oréal UK employees, including distribution centre colleagues have completed the course.

All new purchasing employees must also complete compulsory training on responsible purchasing practices and the completion rate at the end of December 2024 is 77.8% for L'Oréal UK.

On UN Human Rights Day in December 2024, L'Oréal UK reaffirmed its commitment to Human Rights through internal communications channels, resharing the Human Rights & Employee Human Rights policy with L'Oréal UK employees.

Goals and Key Performance Indicators (KPIs)

At L'Oréal UK, we are committed to respecting internationally recognised human rights. We do this by ensuring that we always respect relevant laws and abide by our internal Ethical Principles: Integrity, Respect, Courage and Transparency.

We will continue to take all steps necessary to identify and address any actual or potential adverse impacts in which our business, or any of our subsidiaries may be involved. We will share our progress annually through these reports.

This statement was discussed and approved by the Board of L'Oréal (UK) Limited.



Signed on their behalf by Thierry Cheval, Managing Director,
L'Oréal (UK) Limited.

12th June 2025

Demonstrating Progress Against Our Modern Slavery Statement Actions

- 100% of L'Oréal UK's agencies and labour providers have signed an agreement committing to the respect of human rights (including child, forced and undeclared labour).
- No L'Oréal UK Speak Up reports relating to forced labour were made in 2024.

L'Oréal Groupe - 2030 Goals

In 2020, The L'Oréal Groupe launched L'Oréal for the Future, our 2030 commitments. They mark a crucial new stage in rising to the environmental and social challenges facing our world. Relevant targets include the below and we will be reporting annually on the progress made against these:

- By 2030, 100% of our strategic suppliers' employees will be paid at least a living wage covering their basic needs and those of their dependents, calculated in line with best practices.
- By 2030, we will help an incremental 100,000 people from disadvantaged communities gain access to employment.

L'Oréal UK will play its full part in helping to reach the global objectives outlined above. For example, all L'Oréal UK employees receive the real living wage-based UK Living Wage Foundation calculations.

In addition, in the UK (and globally) we will continue to **implement our on-going Social Audit programme** to ensure that we can effectively manage potential risks across our supply chain. **Where applicable, suppliers and subcontractors will continue to sign up to our Mutual Ethical Commitment Letter.** All L'Oréal UK suppliers of labour will also continue to be required to **sign an agreement committing to respecting Human Rights.** Finally, we will continue to **drive greater awareness of Modern Slavery issues**, both within and outside our organisation, through our on-going Ethics and Training programmes.

Strategic suppliers' are suppliers whose added value is significant for the Group by contributing to L'Oréal's strategy through their weight, innovations, shared goals and geographical representation.

*<https://www.loreal.com/en/uki/pages/commitments/uk-our-product-environmental-and-social-labelling/>

Appendix:

L'Oréal Groupe: Our Values & Ethical Principles

<https://www.loreal.com/en/group/governance-and-ethics/our-ethical-principles/#:~:text=We%20believe%20that%20the%20way,ethically%20day%2Dto%2Dday>

L'Oréal Groupe: Code of Ethics

<https://www.loreal.com/en/articles/commitments/code-of-ethics/>

L'Oréal Groupe: Speak Up Policy

<https://www.loreal.com/en/articles/commitments/speak-up-policy/>

L'Oréal Groupe: Human Rights Policy

<https://www.loreal.com/-/media/project/loreal/brand-sites/corp/master/lcorp/articles-media/2025-l4tf-policies/6th-may/Human-Rights-Policy--VFF2.pdf>

L'Oréal Groupe: Employee Human Rights Policy

<https://www.loreal.com/-/media/project/loreal/brand-sites/corp/master/lcorp/documents-media/publications/commitments/employee-human-right-policy.pdf>

L'Oréal Groupe: Company Reference Document and Vigilance Plan

[2024 Universal Registration Document](#)

[2024 Vigilance Plan](#)

L'Oréal Groupe: 2024 Annual Report

<https://www.loreal-finance.com/eng/news-release/2024-annual-results>

L'Oréal UK: Modern Slavery Act Statements 2016 – 2024 Reports

<https://www.loreal.com/en/uki/>