

Modern Slavery Statement 2023

Statement

Lovehoney Group supports and respects the protection of internationally proclaimed human rights and seeks to ensure that through its own operations, its products and its supply chain it avoids complicity in human right abuses. We have zero tolerance for slavery and human trafficking in our supply chain.

This statement is published on behalf of LH TopCo, LH MidCo, LH BidCo, IntiHealth Ger GmbH and WOW Tech Canada Limited, in accordance with Bill S-211: An Act to Enact the Fighting Against Forced Labour and Child Labour in Canadian Supply Chains Act (the “Act”). It sets out how Lovehoney Group approaches business and human rights and describes the steps that the organisation has taken between January-December 2023 in its efforts to ensure that slavery and human trafficking is not taking place, either in Lovehoney Group’s own business or in its supply chain. The report is approved by the governing body that controls each entity included in the report in accordance with paragraph (4)(b)(ii) of the Act.

This statement is also published on behalf of Lovehoney Group Limited and Lovehoney Limited, in accordance with Section 54(1) of the UK Modern Slavery Act (2015).

Objectives for the Lovehoney Group have been put forward, against which performance indicators which will be tracked and monitored in the coming years.

There were no reports of slavery or human trafficking in Lovehoney Group’s operations or in its supply chain during the reporting period.

Background

Structure

Founded in August 2021, Lovehoney Group brings together established, market-leading sexual wellness brands Lovehoney (UK) and WOW Tech (Germany), along with Swiss brand Amorana and French brands SexyAvenue and espaceplaisir.

Business

Lovehoney Group’s principal business activity is the design, manufacture, distribution and retail of lingerie, adult toys and associated accessories. Our mission is to be the world’s leading sexual well-being company, delivering quality pleasure products that we design, manufacture and sell via our consumer websites and trusted retail partners.

Lovehoney Group counts millions of customers, along with hundreds of business to business customers. The company has more than 1 million followers on social media.

Lovehoney Group is based in Bath, UK, and Berlin, Germany, and has more than 850 employees across 10 international locations.



Some key Lovehoney Group brands:



Supply Chain

Lovehoney Group own brand products are designed in-house and manufactured at our own facilities in China or produced on our behalf by third party manufacturers. We work both via agents and directly with factories. The majority of our suppliers are based in China, with other suppliers across Asia Pacific and Europe.

Lovehoney Group also sells products manufactured by third-party brands. There are around 123 brands sold on Lovehoney platforms, which comprise approximately 25% of Lovehoney Group business.

Policies

Lovehoney Group's Supplier Code of Conduct was published at the end of 2022. A revised Supplier Manual was launched in 2023, outlining the main ways we interact with suppliers and what suppliers can expect during their relationship with Lovehoney Group.

Lovehoney Group has a procedure for reporting a non-compliance, using a reporting tool called Whistlelink. The procedure is accessible to employees and freelancers, as well as former employees, business partners and external stakeholders, via [Lovehoney Group's website](#). Employees can access the procedure through the

company's internal communications, the Code of Conduct or view posters located at our sites. In 2023, there were no reports of modern slavery or child labour.

A company-wide Code of Conduct was developed in 2022, published in English and Chinese. In it, Lovehoney Group outlines its position on respect for human rights, including condemnation of forced labour, child labour and any other form of modern slavery. All employees are expected to read and understand the expectations set out in the Code of Conduct.

The CEO and C-Level Team are accountable for ensuring that the company meets its human rights responsibilities. Everyone at Lovehoney Group has a responsibility to support the business in respecting human rights, whilst the following departments have responsibility for the day-to-day implementation of policies and procedures:

ESG	<ul style="list-style-type: none"> • Responsible business strategy and programs • Monitoring and reporting
People Team	<ul style="list-style-type: none"> • Code of Conduct • Recruitment and employment policies
Legal	<ul style="list-style-type: none"> • Supply agreements • Legal compliance in all jurisdictions • Non-compliance procedure
Operations, Product, Supply Chain & Sourcing	<ul style="list-style-type: none"> • Product supply chain management • Supplier Code of Conduct
Finance	<ul style="list-style-type: none"> • Logistics providers • Non-stock procurement
Quality & Compliance	<ul style="list-style-type: none"> • Product-related legal compliance • Supplier ethical audits • Supplier Manual

Due Diligence

Supply Chain Mapping

Lovehoney Group has undertaken a review of our supplier base, and, during the reporting period, continued to map the Tier 1 of our own brand factories. Our goal is to map 100% of our Tier 1 own brand factories.

We also continued a consolidation process to ensure the most efficient use of the Tier 1 supply chain.

- 95% Lovehoney brand factories mapped,
- 100% WOW Tech factories mapped,
- 100% Amorana factories mapped,
- 75% of Lovehoney Group Tier 1 mapped factories are in China.

Local Team

Lovehoney Group has dedicated local personnel based in China, in Shenzhen and Shanghai, including a team responsible for conducting product inspections and factory audits, and staff members tasked with performing ethical audits for the group.

In 2023, the local team in China embarked on supporting quality inspections in Lovehoney Group own brand factories. We recognise that this is a valuable resource which can be utilised, in addition to our existing audit processes, to spot signs of labour exploitation for further investigation. The local team has attended Lovehoney Group's modern slavery training.

Audit

Lovehoney Group approaches ethical audits of the factory base in China working with a qualified auditor as well as a third-party provider, QIMA.

Lovehoney Group has developed a bespoke auditing scheme, in order to take a high-level overview of social standards in our factories. The methodology includes Social Accountability parameters against the following Supplier Code of Conduct areas: Regular Employment, Child Labour and Young Workers, Forced Labour, Working Hours, Fair Remuneration, No Discrimination, Humane Treatment and Health and Safety.

In 2023, we conducted 54 audits in our supply base. As part of the updated onboarding process, all new Lovehoney factories are required to undertake this audit before production can commence. Factory renewal audits are conducted annually.

We are committed to performing an ethical audit at 100% of our Tier 1 own brand factories. In alignment with Global Reporting Initiative indicators GRI408-1 (child labour) and GRI409-1 (forced labour), we are seeking to identify any operations or suppliers at risk of child labour or forced labour by tracking the number of ethical audits conducted per year, along with the number of corrective actions identified and resolved. We are tracking the number of factories audited before production begins.

Furthermore, we are integrating a requirement for 100% of Tier 1 own brand factories to submit an annual Social Responsibility Alliance Slavery & Trafficking Risk Template (STRT) to Lovehoney Group. In 2023 we also began targeting relevant suppliers of electronic components to complete an annual Responsible Minerals Initiative Conflict Minerals Reporting Template (CMRT) and/or Cobalt Reporting Template (CRT), to help us avoid complicity in human rights abuses in this part of our supply chain.

Gauging the industry position

The sexual wellness sector is growing fast but at present, brands do not typically work collaboratively to address challenging supply chain issues, in the way that those in other industries (such as fashion and food) have done in recent years. In recent years, we have engaged a third-party consultancy to survey and interview Lovehoney Group's key brand partners to identify and discuss their priorities in relation to social and environmental challenges. Whilst the industry is not as advanced as others in driving forward sustainability and corporate responsibility programs, some key brand partners are beginning to proactively work on initiatives in this domain. Lovehoney Group's intention is to be a leader in good practice as our programme develops.

Supply Agreement

Our contractual agreement with suppliers sets out specific ethical standards and principles that suppliers must abide by, such as those related to health & safety, living wages, working hours, child labour, no discrimination, etc. and stipulates that there must be no use of forced labour.

In 2023, we reviewed the standard Supply Agreement to ensure that we adequately address ethical, social and environmental conduct expectations. The Supply Agreement explicitly requires compliance with our new Supplier Code of Conduct. We commit to sharing the Supply Agreement with our Tier 1 own brand suppliers, as well as seeking to capture 100% of our Category 1 suppliers (spend >€10 million/annum).

Risk

Lower supply chain tiers

We recognise that the risk of slavery increases in lower tiers of the supply chain. We will continue to focus on mapping our Tier 1 supply chain and identifying suppliers in lower tiers wherever possible to increase our visibility of modern slavery risks. As we build out our environmental, social and governance strategy, we intend to identify and address the social and environmental impacts of our key raw materials.

Our objective is to push our ethical conduct expectations further into the supply chain, and, initially, we will integrate a process for Tier 1 own brand suppliers to provide declarations on behalf of their suppliers (Tier 2 and 3).

Procurement – Lovehoney Business and Operations

Our responsibility to protect against instances of modern slavery extends beyond products to include non-stock goods and services. There can be a risk of slavery in logistics and warehousing and as an initial step, we have provided modern slavery training to our warehouse managers and teams responsible for labour procurement, highlighting the risks that may be present in the recruitment of labour to our warehouses.

We have set a target for 100% of our recruitment agents to acknowledge our Supplier Code of Conduct.

Third party brands

Our initial focus is on identifying modern slavery and child labour risk in our own brand supply chain. However, we acknowledge that there can be risks in the supply chain of the third-party brands we sell through our platforms. As a next step, we will develop an appropriate risk assessment program for this group of suppliers.

Performance

Lovehoney Group is bringing together numerous manufacturing and retail businesses across the world, all of which are at different stages in their ethical trading programmes. We have prioritised laying out a systematic approach to supply chain management and implementing due diligence processes and policies.

The table below outlines our objectives at supplier and employee level. We will continue to work on these initiatives, track our progress and report our performance.

Objective
Gain clarity of our Tier 1 supply chain across the Group
Screen Tier 1 suppliers for ethical risks
Share fundamental conduct expectations with Tier 1 own brand and Category 1 suppliers through the Supplier Code of Conduct
Place contractual obligations on Tier 1 own brand and Category 1 suppliers towards environmental, social and governance practices through the Supply Agreement
Integrate a requirement for Tier 1 own brand suppliers to complete an annual Social Responsibility Alliance Slavery & Trafficking Risk Template (STRT)
Push ethical conduct expectations further into the supply chain
Avoid the risk of modern slavery in the recruitment of temporary labour
Integrate a requirement for suppliers of electronic components to complete an annual Responsible Minerals Initiative Conflict Minerals Reporting Template (CMRT) and Cobalt Reporting Template (CRT)
Raise awareness of modern slavery and empower our people to identify the signs
Integrate modern slavery training into new starter induction for specific functions

Employee Training

Lovehoney Group has commissioned modern slavery training for employees, tailored to a range of different job roles. The training was developed in partnership with a responsible business consultancy whose personnel have significant experience in preventing and mitigating modern slavery in retail supply chains. Targeted employees for training focusses on those identified as having the most likelihood of exposure to modern slavery risk: product teams (buying, designing, supply chain management, sourcing), operations (logistics, warehousing, facilities, human resources, quality and finance) and senior leadership.

The training includes:

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- Modern slavery definition and prevalence in society,
- Supply chain structures and risks of slavery and labour exploitation,
- Indicators of modern slavery to be embedded in supply chain and operational processes,
- Purchasing practices and related impacts on supply chain,
- Escalation process.

We will provide modern slavery refresher training. Furthermore, we are integrating modern slavery awareness into our mandatory compliance training package for new starters to ensure that people joining the business are informed of their responsibilities and the company's commitment to acting on modern slavery.

Approval

This statement was approved by the C-Level on 30th May 2024.

For the UK Modern Slavery Act (2015)

On behalf of Lovehoney Group Limited and Lovehoney Limited

Name: Johannes von Plettenberg 

Title: Chief Executive Officer

Date: 30-May-2024

For the Forced Labour and Child Labour in Canadian Supply Chains Act

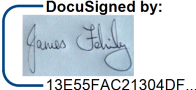
In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

On behalf of LH TopCo as the parent company of Lovehoney Group

Name: Enda Fahy 

Title: Class A Manager

Date: 01-Jun-2024

Name: James Fehily 

Title: Class B Manager

Date: 30-May-2024