



Modern Slavery Statement 2021

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Introduction

The prevention of slavery and human trafficking is high on our agenda. We care deeply about the well-being of our employees, contractors and those in our supply chain.

This is our fourth Modern Slavery Statement under section 54 of the Modern Slavery Act 2015 (**Statement**) of the Charlotte Tilbury group of companies. The Statement includes an update on the commitments of our Modern Slavery Statement during the previous financial year to ensure human trafficking and slavery are not taking place within our organisation and supply chain. We are publicly committed to ensuring that modern slavery and other human rights abuse in any form are not tolerated within our organisation or in our supply chain.

On 23 June 2020, Islestarr Holdings Limited was acquired by Charlotte Tilbury Limited and now forms part of the Puig S.L. group of companies. The Statements is made on behalf of Charlotte Tilbury Limited and each of its subsidiary companies (together the **Charlotte Tilbury Group**).

This Statement sets out the steps we have taken to identify, mitigate and address modern slavery risk within our business and supply chain over the previous twelve months and how we will continue to do so as Charlotte Tilbury Group grows.





Key developments for the year in review

- We refreshed and rolled out bespoke internal mandatory **Modern Slavery Training** which all Charlotte Tilbury Group employees must undertake. The new training is complemented by our mandatory Anti-Bribery and Corruption training
- We have a **new Procurement Team** within the Charlotte Tilbury Group who help to ensure that our Code of Conduct is built into contract negotiations and renewals and to ensure we have continued oversight of ethical trade requirements and firm compliance commitments from our partners and suppliers
- We continue to **monitor and update our new supplier on-boarding process**, to ensure the correct questions are asked and the right policies are rolled-out
- We conducted a **segmentation exercise** with our key suppliers to identify the most effective way to engage and monitor their ethical and anti-slavery compliance. This considers factors such as geography, product type and supply/source points and enables us to ensure the most effective approach with each supplier
- We reviewed our **Code of Conduct** which includes our ethical trading and fair working standards requirements from our suppliers and partners
- We have undertaken a project to identify all **raw material suppliers** within our product supply chain





Our Business

We are the brand behind one of the top make-up artists in the world and a global provider of luxury beauty, skincare and perfume products that has been shaking up the beauty industry since 2013.



5 Freestanding
Stores/Pop-Ups
Globally



36 Retail Partners,
and Concessions
Globally



1100+
Employees Globally



4 Head Offices

- London, UK
- New York, NY
- Shanghai, China
- Central Hong Kong



£232

Million Annual Turnover*

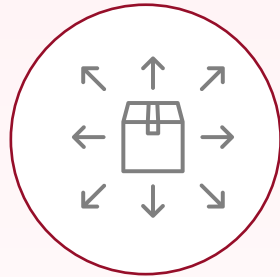


Our Suppliers

To produce our luxury beauty and skincare products we work globally with industry leading manufacturers and suppliers of components, consumables, and retail tools.



8 Distribution Centres



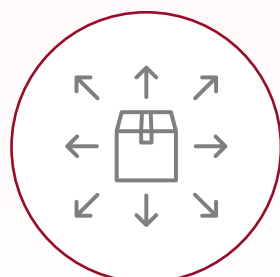
39 Manufacturers



2 Freight Companies



12 Countries Products Sourced



1,730 Raw Materials



4.5 Years Average Relationship with Key Suppliers



Policies

Code of Conduct:

Our robust Code of Conduct sets out **our ethical trading and fair working standards**. It reflects our commitment to acting with integrity in all our business relationships, and our **effective systems and controls** to ensure slavery and human trafficking is not taking place in our supply chains. It also sets out our expectation that all employees, supplier and third party partners will comply with ethics and anti-slavery practices.

Procurement:

Our newly appointed Procurement Team ensure Procurement polices and practices reflect **our approach to ethical trade**.

When selecting suppliers, we take steps to ensure we have continued oversight of ethical trade requirements, and firm compliance commitments from our business partners.

We also have a strict **Contract Authorisations Policy** which ensures that agreements over a certain value or those which may have more exposure can only be approved and/or entered into by the CEO.

People Policies:

We commit to an internal culture based on **inclusion, mutual respect and trust**. Our People Team policies include our Code of Conduct which is issued to all new joiners & available to employees throughout their employment.

Our employee training together with the **Code of Conduct** and **Confidential Concerns Policy** empowers our employees with the tools they need to identify modern day slavery and report any concerns without fear of adverse consequences.

Update & Future Plans:

- We are reviewing and improving our new-Supplier onboarding process, to ensure the correct questions and requirements are implemented.
- We continue to ensure that our Code of Conduct & Policies are kept under review and updates shared with our key product manufacturers, suppliers and employees to ensure the highest levels of ethical trade are committed to.



Supply Chain

Supplier Commitments:

Code of Conduct issued to all key suppliers, and a commitment by them to abide by it.

Contractual commitment and clauses in agreements from all new key suppliers to comply with anti-slavery requirements, global and local.

Responsible Mica Use declarations from 90% of manufacturers of finished goods in our supply chain.

Supplier Executive Review Meetings with our key suppliers include a regular agenda item for modern slavery compliance.

Raw Material Audit conducting a full raw material audit with each of our suppliers.

Segmentation Exercise:

During 2020/21 we have commenced a segmentation exercise of key suppliers to identify **the most effective way to engage and monitor their ethical and anti-slavery compliance**. By considering factors such as geography, product type, and supply/source points we are determining the most effective approach to take with each supplier.

We will continue to roll this out during 2021 by way of site visits; audits/desktop assessments (internal & third party); reliance on internal and third party know-how, advice and experience with suppliers.

Collaboration:

We work closely with our key suppliers to ensure that they implement and comply with the Supplier Commitments.

During 2021, we will request that key suppliers provide us with their modern slavery strategy and ethics initiatives.

We will work collaboratively with these suppliers to ensure that their commitments **reflect and maintain the high level of compliance commitment** that we require of ourselves and our partners.

Update & Future Plans:

- We have taken steps towards executing our Segmentation Exercise. We will continue this work during 2021.
- We have implemented the Supplier Commitments outlined above. These are ongoing commitments that we will continue to monitor and progress.



Risk Assessment

Identifying Our Risk:

Modern Slavery comes in many different shapes and forms. We acknowledge that it can be hidden within a complex, often opaque, supply chain network.

We have identified the following areas as giving rise to a **higher risk of modern slavery**:

- Where work is undertaken in countries where **modern slavery is more prevalent**
- Where our manufacturers **subcontract manufacturing processes**
- Where **non-resale services are provided** e.g., logistics

Due Diligence:

Our Due Diligence processes help us assess and mitigate potential risks:

- **Onboarding processes** for employees and contractors (such as right to work checks & completion of key training) and for suppliers (such as ethical compliance assurances)
- **Ongoing monitoring and escalation processes** for employees (such as our Confidential Concerns Policy) and of suppliers (such as our commitment to implementing regular meetings reviewing anti-slavery compliance and our ongoing Segmentation Exercise to implement ongoing reviews of supplier compliance)

Update & Future Plans:

Our risk assessment and due diligence is continually evolving. We:

- Plan to **explore further due diligence and safeguarding** to implement with our third-party suppliers and manufacturers, to **increase transparency and reduce risk**
- Will create and establish an **Ethical Trade and Modern Slavery Working Group** to evaluate existing processes and **facilitate positive change**
- Will look closely at the output from the **raw material audit** to ascertain any high risk areas and action accordingly



Training

All Employee Training:

During the year under review, we refreshed and rolled out our **bespoke internal mandatory Modern Slavery training** which is being undertaken by all existing and new Charlotte Tilbury employees. This new training is complimented by our new **mandatory Anti-Bribery and Corruption training**, providing all employees a rounded training program on ethical business practices.

We are implementing periodic bite-size “refresher” communications to be sent to employees to remind them of anti-slavery and anti-ABC practices, and provide them with ongoing support and tools to maintain positive active engagement with these issues.

Specialised Training:

We have explored training with external providers for our Executive Team and those working in business and geographical areas that are **more susceptible** to anti-slavery and other unethical practices.

We shall be implementing specialised training to **increase the positive engagement** of these employees and their awareness of modern slavery issues. Our employees are our biggest brand ambassadors, and we are committed to their empowerment to identify and call out unethical practices.

Update & Future Plans:

- Our All-Employee Modern Slavery Training will be reviewed and updated annually. It must be undertaken on an annual basis by all employees and new starters.
- As Charlotte Tilbury Group grows, we will continue to **consider and identify targeted training** for employees in roles and geographic regions that are more susceptible to unethical practices. We will seek to work with **industry-leading external partners** to ensure we equip our employees with best practice learnings. We will collaborate with our suppliers and third parties to ensure that our learnings and expectations are shared.



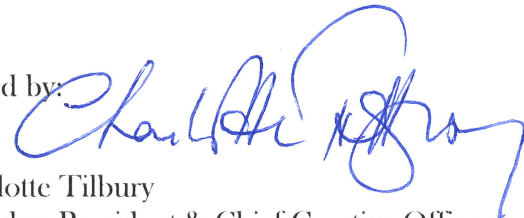
Update from our Executive

As a leading luxury beauty business, we understand that all our stakeholders expect us to conduct our operations in a responsible, transparent and ethical manner and the Charlotte Tilbury Group is committed to ensuring its business and suppliers/partners are free from slavery and human trafficking.

During the course of 2021, whilst continuing to deliver on the pledges set out in this Statement, we will also start working closely with our parent company, Puig S.L., to embed the Charlotte Tilbury Group within its Sustainability Strategy. We very much look forward to partnering and learning from our colleagues at Puig.

This Statement reflects the steps Charlotte Tilbury Group has taken during its financial year ending 31 December 2020. Charlotte Tilbury Limited is a private limited company registered in England and Wales with registered number 12618110 it has 13 subsidiary companies in: the United Kingdom, United States of America, Hong Kong, China, Germany, Netherlands, Canada, France and Italy. It has a branch in Spain.

This Statement has been approved by the Charlotte Tilbury Limited board of directors on 9 June 2021.

Signed by: 
Charlotte Tilbury
Founder, President & Chief Creative Officer


Demetra Pinsent
CEO





Modern Slavery Statement 2021

For all comments or queries in relation to this document, please contact us at legal@charlottetilbury.com