



ELEMIS

Human Rights Policy

Respecting people, everywhere we work

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This Human Rights Policy (this “Policy”) applies to all ELEMIS employees and is mandatory for anyone carrying out work or services for or on behalf of ELEMIS.

Respecting people, everywhere we work

At ELEMIS, respecting human rights is part of how we do business. It shapes the way we work with our employees, suppliers, consumers, business partners and the communities connected to our value chain.

Our products are rooted in the beauty and power of nature – so we’ve made commitments to protect land and ocean ecosystems, and the people we work with.

This policy explains our commitment to respecting internationally recognised human rights, how we put that commitment into practice, and what people can expect from us.

OUR COMMITMENT

We are committed to respecting human rights across our own operations and throughout our value chain. This means acting responsibly, identifying where people could be at risk of harm, taking action to prevent or reduce those risks, and providing access to safe ways to raise concerns.

Our approach is guided by internationally recognised standards, including:

- The Universal Declaration of Human Rights
- The International Labour Organization’s Core Conventions
- The United Nations Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- The Ten Principles of the United Nations Global Compact

We comply with national laws wherever we operate, and we also recognise our voluntary commitments as members of the United Nations Global Compact.

Respecting human rights is not just about compliance. It is about treating people fairly, creating safe and respectful working environments, building trust, and making sure our growth has a positive impact on people and communities.

WHO THIS POLICY COVERS

This policy applies across:

- Our own operations
- Our employees and workers
- Our brands and business activities

- Our suppliers and business partners
- Our consumers
- Communities connected to our value chain

Human rights apply to everyone. While some risks may be more relevant in certain parts of our business or value chain, our expectation is the same: everyone should be treated with fairness, dignity and respect.

HOW WE WORK

Our Code of Business Conduct (*handbook*) sets out the values, actions and behaviours expected from everyone employed by, representing or working with ELEMIS. It includes important human rights principles such as preventing forced labour, child labour and discrimination, promoting safe and healthy working conditions, and protecting workers' privacy.

As a B Corp-certified company, we are committed to going beyond compliance and contributing to a more sustainable, fair and inclusive world.

We also support philanthropic projects focused on environmental protection, education, health and the empowerment of women and communities.

OUR EMPLOYEES

EQUAL TREATMENT AND OPPORTUNITY

We want everyone who works with us to feel respected, valued and able to contribute.

We are an equal opportunities employer. Employment decisions - including recruitment, promotion, pay, benefits, training and termination - should be based on merit, qualifications and business needs, without discrimination.

We are committed to treating employees with fairness, dignity and respect, regardless of race, colour, sex, religion, political opinion, national extraction, social origin, sexual orientation, gender or any other characteristic.

Everyone has a part to play in creating a workplace where people feel included, safe and able to be themselves.

A WORKPLACE FREE FROM VIOLENCE AND HARASSMENT

Everyone deserves to be treated with courtesy and respect.

We do not tolerate actual or threatened violence, harassment, bullying or intimidation towards employees, clients, visitors or anyone we come into contact with through our work.

If something does not feel right, we encourage people to raise it. Concerns will be taken seriously and handled appropriately.

SAFE AND HEALTHY WORKING CONDITIONS

We are committed to providing a safe and healthy working environment for all employees.

This includes following local and international health and safety requirements, carrying out risk assessments, putting appropriate safety measures in place, providing health and safety training, supporting ergonomic working environments, and promoting mental health and wellbeing.

Safety is not a one-off exercise. We expect our teams and managers to stay alert to risks and speak up when something needs attention.

FAIR PAY AND BENEFITS

We want our people to be fairly rewarded for their work.

Our ambition is that all employees across ELEMIS receive fair pay and benefits at, or above, the fair living wage or appropriate per market. Fair pay matters because it supports wellbeing, dignity and financial security.

FREEDOM OF ASSOCIATION

We respect employees' rights to freedom of association and collective bargaining.

This includes the right to form or join trade unions and to participate in collective negotiations without fear of retaliation or discrimination.

OUR SUPPLY CHAIN

We know our responsibility to respect human rights extends beyond our own teams. We expect our suppliers and business partners to share these standards and to work with us to protect the rights of people throughout our value chain.

PREVENTING CHILD LABOUR

We are committed to preventing child labour in any form within our supply chain.

We work to make sure child labour does not occur, and if an issue is identified, we will take action to address it and support improvement for those affected. We monitor suppliers and expect compliance with international child labour standards.

PREVENTING FORCED LABOUR

We stand firmly against all forms of forced labour.

Everyone working in our supply chain should be employed freely and voluntarily, without coercion, threat or exploitation. This commitment includes migrant workers and others who may be more vulnerable to exploitation.

Every worker deserves to be treated with dignity and respect.

NON-DISCRIMINATION

We expect suppliers to maintain workplaces that are free from discrimination.

All workers should be treated fairly and respectfully, regardless of race, gender, ethnicity, religion, sexual orientation or any other characteristic.

LIVING INCOME AND WAGES

We are committed to supporting fair living income across our supply chain.

This includes paying the prices and costs needed to enable suppliers to compensate workers fairly. Our responsibility is not limited to our direct employees; it extends to the people whose work supports our products and business.

SAFE WORKING CONDITIONS

Every worker should be able to work in conditions that are safe and free from avoidable hazards.

We work with suppliers to uphold safety standards and protocols, including audits, compliance with international safety regulations and continuous improvement.

OUR CONSUMERS

Our responsibility to respect human rights includes the people who buy and use our products.

PRODUCT SAFETY AND THE RIGHT TO HEALTH

We are committed to ensuring that our products are safe for their intended use.

Respecting consumers' right to health is an important part of our human rights approach, particularly in relation to product safety and potential consumer impact.

THE RIGHT TO CLEAR INFORMATION

Consumers should be able to make informed choices.

We are committed to providing transparent and accurate information about our products, including ingredients, origin and potential risks. Clear information supports consumer autonomy and responsible decision-making.

PRIVACY AND DATA PROTECTION

Consumers trust us with their personal information, and we take that responsibility seriously.

We are committed to protecting privacy and handling personal data securely. Our procedures cover the way personal data is collected, used, retained and shared, and we limit those actions to what is necessary and proportionate for a legitimate purpose.

FAIR AND RESPONSIBLE MARKETING

We want our marketing and communications to reflect the diverse world we live in.

As a brand and retailer of beauty and wellness products, we work to remove racial, gender and socioeconomic stereotypes from our marketing and advertising. We aim to be inclusive when considering gender, race, class and sexuality in our communications.

OUR COMMUNITIES

We recognise that our activities can affect communities connected to our operations and value chain.

We are committed to supporting good living conditions and environmental sustainability. This includes working with stakeholders who share our commitment to minimising environmental impact, including air and water pollution. Through sustainable practices, resource conservation, pollution prevention and ecosystem protection, we aim to safeguard the health and wellbeing of communities and the natural environment they rely on.

PUTTING THIS POLICY INTO PRACTICE

IMPLEMENTATION

This policy is part of how we hold ourselves accountable.

It is publicly available on ELEMIS's corporate website for external stakeholders, suppliers and business partners, and it is also available through internal communication channels. Each manager is responsible for ensuring that employees are aware of, understand and follow this policy.

Managers play an important role in bringing this policy to life. That means creating space for questions, making expectations clear, and acting when concerns are raised.

HUMAN RIGHTS DUE DILIGENCE

We work to identify, prevent, reduce and account for potential adverse human rights impacts linked to our activities.

Our approach includes risk assessments, stakeholder engagement, supplier evaluations, ongoing monitoring and review. Human rights considerations are integrated into our decision-making, from strategic planning through to day-to-day operations.

If we identify human rights impacts connected to our business relationships, we will use our influence to encourage suppliers and business partners to meet human rights expectations. This may include corrective action plans or, where necessary, ending the relationship.

SPEAKING UP AND ACCESS TO REMEDY

If something does not feel right, people must be able to raise concerns safely.

Aligned with our Speak Up Policy, we have a whistleblowing mechanism available throughout our value chain. This channel is publicly accessible on our corporate website and is designed to collect reports about potential or actual violations of our policy commitments, including human rights concerns.

Employees and external third parties, including business partners and suppliers, have access to an anonymous, confidential and secure reporting process operated by an independent third party. We are committed to investigating concerns thoroughly and providing appropriate responses and remedies.

GOVERNANCE

This policy has been overseen and approved by ELEMIS's Chief Executive Officer and General Management Committee.

To support effective implementation, ELEMIS are part of a Group-wide Business and Human Rights taskforce. The taskforce monitors priorities and tracks progress across our human rights initiatives.

HELP AND SUPPORT

Human rights can feel like a broad topic, but at its heart this policy is about people: how they are treated, how risks are managed, and how we act when something needs attention.

If you have a question about this policy, need guidance, or want to raise a concern, please speak to your manager, the People Team, Legal, Compliance, or use the Speak Up channel.

We would always rather hear about a concern early, so we can understand it properly and take the right action.

This Policy has been reviewed and formally endorsed by the ELEMIS General Management Committee (GMC) and reflects our commitment to human rights in our value chain.