



ELEMIS

Responsible Marketing & Communications Policy

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

DOCUMENT RECORD

REV	CHANGES	DATE
1	Original	April 26
2	LS	June 26

OUR POLICY COMMITMENT

At ELEMIS, our purpose has always been rooted in the balance of nature, science and human touch – from our products and treatments to the way we operate and communicate. As a British brand with a global presence, we recognise that responsible marketing and transparent communication are essential to building trust with our diverse audiences.

Our approach is grounded in respect for people, cultures and communities, and ensures our messaging is always truthful and respectful.

Justice, equity, diversity and inclusion are central to this Policy. We're committed to fostering fair and respectful workplaces where everyone feels they belong and can thrive. We value diversity in all its forms, take a zero-tolerance approach to discrimination and ensure equitable opportunities for all. Through inclusive leadership, fair practices and shared accountability, we empower our people to be themselves and fulfil their potential.

This policy ensures all marketing and communications:

- Are conducted responsibly, ethically and legally
- Are accurate and reflect our overall social and environmental impact
- Consider the broader effects of marketing and public relations on society and the environment
- Safeguard our brand reputation and mitigate potential risk in accordance with international market compliance

SCOPE OF COMMITMENT

ELEMIS is committed to the responsible marketing of all our products and treatments. This Policy sets out the standards for all marketing and communications activities carried out by the brand or on its behalf. It applies to employees, contractors, agencies and partners involved in creating or delivering brand communications, all of whom are expected to adhere to these principles to fulfil their responsibilities. It covers all channels and formats, including but not limited to advertising, direct marketing, digital and social media, influencer activity, packaging, product placement, in-store materials, events, partnerships, consumer research, spa treatments, retail and spa partners (including OneSpaWorld) and all ELEMIS-associated therapists. The policy applies to all markets in which we operate and governs activities where we have direct influence or control. Communications which are not under ELEMIS' direct control are not covered by this Policy.

ELEMIS' RESPONSIBLE MARKETING PRINCIPLES

Beauty marketing and advertising has a cultural influence that goes beyond selling products. We take that seriously. The following principles set out the standards that guide all ELEMIS marketing and communications activities. They are designed to ensure our content is responsible, ethical, inclusive and aligned with our values, while meeting the expectations of consumers, partners and regulators.

1. RESPONSIBLE USE OF DATA AND TECHNOLOGY

- We are committed to using personal data lawfully, fairly and transparently, and only where we have a clear and documented basis to do so. Every marketing channel operates under a documented lawful basis, reviewed and maintained in line with applicable laws in each market we operate in.
- We will always give individuals a genuine choice about how we communicate with them, and we will honour that choice promptly and consistently across all channels and systems.
- Where consumers share information about their skin, health or wellbeing, we will handle that information responsibly and in line with applicable data privacy laws.
- All marketing communications will include complete and accurate privacy information, covering purpose, retention, rights and how to contact our Data Protection team.
- We will make it easy for consumers to exercise their rights and any data subject request or complaint received through a marketing channel will be handled through a defined and timely process.
- We use emerging technologies, including AI, as tools to support human creativity – not replace it. All AI-generated consumer-facing content is guided by human judgment, accountability and our commitment to truthful, responsible communication.

2. TRUTHFUL CLAIMS AND EVIDENCE

- We stand behind every claim we make. Whether we're talking about what a product does, what goes into it or what we're doing for the planet, our words will be accurate, evidenced and proportionate.
- Efficacy claims, including terms such as 'independently tested' or 'clinically proven', will be supported by robust, up-to-date evidence and approved through a defined internal process before use.

- Sustainability and natural-ingredient claims will be specific, qualified and compliant with the UK CAP Code, ASA and FTC rules and the EU Green Claims Directive. We will not imply more than we can demonstrate.
- We recognise that claim substantiation and acceptability varies by market. We ensure all claims are thoroughly reviewed in keeping with local market compliance.

3. INCLUSIVE REPRESENTATION AND ENGAGEMENT

- We will ensure our marketing communications are developed and delivered in a way that is honest, inclusive and respectful of the diverse audiences we reach.
- We do not intentionally target children or younger audiences in our marketing, and we apply safeguards to help ensure our content is appropriate across all channels. Content related to body image or appearance is always reviewed before publication to ensure it aligns with responsible advertising standards.
- Our visuals – including casting, creative direction and post-production – will represent people as they are, not an idealised version of how they should look or feel. Retouching will be limited to technical purposes and will never be used to alter body shape, skin texture, perception of age or identity-defining features.
- We will use inclusive and accessible language consistently across all channels and markets. Our digital content will meet the internationally recognised standards of the Web Content Accessibility Guidelines (WCAG) as a minimum.
- Our communications will respect the dignity of all cultural, social, religious and ethnic groups and will not include content that could be considered offensive or inappropriate.
- Wherever possible, we use clear, simplified and inclusive language that's both relevant and easy to understand for our consumers, including using the appropriate language for the markets ELEMIS operates within.

4. RESPONSIBLE INFLUENCER & AFFILIATE PRACTICES

- We work with a wide range of partners, influencers and agencies to bring ELEMIS to life and we expect them to uphold the same standards we hold ourselves to.
- All paid and gifted partnerships will be disclosed clearly and transparently in line with ASA (Advertising Standards Authority) and FTC (Federal Trade Commission) requirements.

- Influencer and affiliate briefs and contracts will set out compliance obligations, prohibited claims and content approval requirements and applicable data processing responsibilities.
- Influencers will not make any medical or exaggerated claims beyond approved wording.
- ELEMIS has a defined process for responding swiftly when content published on our behalf is off-brief, non-compliant or potentially harmful.

5. ETHICAL PARTNERSHIPS

- We will not enter commercial partnerships that conflict with our values on health, human rights, environmental responsibility or inclusion. Before starting any partnership, we will thoroughly assess whether the organisation or personality meets these standards.
- All agencies, influencers and partners acting on behalf of ELEMIS are required to uphold the standards set out in this Policy as a condition of their engagement.

GUIDANCE ON OUR PRINCIPLES

Responsible marketing is key to living in a fair and equitable society that uses advertising to authentically reflect the world we live in. We must do what we can to stop the perpetuation and progress of harmful and damaging stereotypes and ideologies. In our position of power, we can champion individuality and self-expression through inclusive creative and communications. It is our responsibility to do so.

If you have any further questions, please reach out to your department lead.

If you have concerns about any activity that may breach this Policy, we encourage you to speak up. Further guidance on how to raise concerns, including confidential reporting options, is set out in the L'OCCITANE Group Speak Up Policy - [GROUP SPEAK UP POLICY OCTOBER 2024 - ENG.pdf](#)

CONSEQUENCES FOR FAILURE TO COMPLY

Enforcement of this Policy will be the responsibility of the Head of Data Protection & Compliance, with the support of the People Team and senior brand leadership. Serious violations or matters involving legal or regulatory risk will be escalated to L'OCCITANE Group Legal Team. We take allegations

of misconduct seriously and are committed to taking appropriate action based on the type and severity of the breach. Anyone who violates any provision of this Policy will be subject to disciplinary action in accordance with the ELEMIS employee handbook and applicable employment policies. Third parties, agencies or partners found to be in breach of this Policy may have their engagement with ELEMIS terminated.

Concerns or suspected breaches should be reported to the Head of Data Protection & Compliance at compliance@elemis.com

ADMINISTRATION OF THIS POLICY

ELEMIS reserves the right to change, modify or delete the contents of this Policy without notice. Any changes will be announced and training updated accordingly. You are responsible for consulting and complying with the most current version of this Policy.

CONDUCT NOT PROHIBITED BY THIS POLICY

This Policy is not intended to restrict any communications or actions that are protected or required by applicable law, including rights related to employment, freedom of association or collective representation.

This Policy has been reviewed and formally endorsed by the ELEMIS General Management Committee (GMC) and reflects our commitment to responsible marketing and communications.