

# GROUP HUMAN RIGHTS POLICY

October 2024

*Groupe*  
L'OCCITANE



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## INTRODUCTION

At L'OCCITANE Group, we are dedicated to upholding internationally recognised human rights standards across all aspects of our operations, including those set forth by key international frameworks such as the:

- Universal Declaration of Human Rights
- International Labour Organization's (ILO) Core Conventions
- United Nations Guiding Principles on Business and Human Rights
- Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises
- Ten Principles of the United Nations Global Compact (UNGC)

Our policy ensures compliance with national laws while embracing our voluntary commitments as members of the UNGC.

As a conscientious company operating in the cosmetics industry, we acknowledge our responsibility to respect human rights in our operations, and we encourage and support our business partners to do likewise.

Recognising the intrinsic value of human rights to both ethical conduct and sustainable business, we strive to foster a positive work environment, build stakeholder trust and mitigate operational risks. This policy is applicable to the downstream and upstream of our value chain as well as our own operations. Through this policy, we affirm our dedication to ethical business practices and social responsibility, and we thereby contribute to the realisation of human rights for all.

## OUR VISION AND APPROACH

Our mission guides all the Group's actions – with empowerment we positively impact people and regenerate nature.

To deliver on this mission, our Code of Business Conduct outlines the values, actions and behaviours expected of all those who are employed by, represent or engage with L'OCCITANE Group. The Code sets minimum requirements related to core principles of human rights, including eliminating forced labour, child labour and discrimination, while promoting a safe and healthy work environment as well as safeguarding the privacy of workers.

As a B Corp™-certified company, we are committed to respecting and promoting human rights in our direct operations and all along our value chain. Our commitments go beyond compliance with the principles contained in international standards aimed at contributing to a more sustainable, fair and inclusive world.

The Group and its Brands also support international philanthropic projects focusing on environmental protection, education, health, self-esteem and the empowerment of women and communities.

## HUMAN RIGHTS WITHIN OUR VALUE CHAIN

We acknowledge the universality of human rights throughout our entire value chain. As a result of our participation in the UNGC's Business & Human Rights Accelerator, and after conducting a materiality assessment,

we were able to recognise the salient human rights issues for the identified stakeholders across the value chain. This does not mean these issues are exclusive to those categories but rather highlights their particular importance in those areas while affirming that all stakeholders must respect all human rights.

## OUR EMPLOYEES

**Equal treatment and opportunity:** L'OCCITANE Group is an equal opportunities employer committed to creating a more diverse and inclusive workplace and organisational culture where everyone feels respected and valued. Equal opportunity means that all employment decisions, including hiring, promotion, compensation, benefits, training and termination, are based on merit, qualifications and business needs without any form of discrimination. We are dedicated to fostering a workplace free from discrimination of any kind. In alignment with ILO Convention 111, all employees of L'OCCITANE Group are treated with fairness, dignity and respect, regardless of race, colour, sex, religion, political opinion, national extraction or social origin. We extend this commitment to include sexual orientation, gender and any other characteristic to ensure a truly inclusive environment.

**Eliminating violence and harassment at work:** We are committed to providing a working environment that is free from acts or threats of violence and harassment. L'OCCITANE Group has 'zero tolerance' for actual or threatened violence or harassment against staff, clients, visitors or any other person. Each employee, and everyone with whom we come into contact in our work, deserves to be treated with courtesy and respect.

**Safe and healthy working environment:** At L'OCCITANE Group, we are dedicated to ensuring a safe and healthy working environment for all employees. We adhere to local and international health and safety regulations, and we conduct regular risk assessments and implement comprehensive safety measures. Our initiatives include providing thorough health and safety training, maintaining ergonomic workplace designs and promoting mental health and well-being.

**Living income and wages:** We aspire to ensure that all employees across the L'OCCITANE Group receive fair pay and benefits at or above the family living wage threshold by FY2026. Our goal is to achieve certification as a fair pay and benefits provider, as defined by the Fair Wage Network: 'A wage that ensures minimum acceptable living'. Achieving this certification will underscore our commitment to social responsibility and our efforts to support the well-being and financial security of our workforce.

**Freedom of association:** We recognise and respect the rights of our employees to freedom of association and collective bargaining. L'OCCITANE Group supports its employees' right to form or join trade unions and participate in collective negotiations without fear of retaliation or discrimination.

## OUR SUPPLY CHAIN

**Child labour:** We are fully committed to preventing child labour in any form within our supply chain. We deploy all our efforts to ensure that no instances of child labour occur, and we take immediate action to rectify any identified cases while striving to improve the situation for those affected. We rigorously monitor our suppliers to uphold this commitment and enforce strict compliance with international child labour laws.

**Forced labour:** L'OCCITANE Group stands firmly against all forms of forced labour. We work diligently to ensure that all workers in our supply chain are employed freely and voluntarily, without coercion, threat or exploitation. This commitment extends to all individuals, including migrants, who are often vulnerable to exploitation due to their marginalised status. We believe that every worker deserves to be treated with dignity and respect, and we remain dedicated to upholding these principles across our entire operations.

**Non-discrimination:** We require our suppliers to maintain workplaces free from discrimination. All workers must be treated with fairness, dignity and respect, regardless of race, gender, ethnicity, religion, sexual orientation or any other characteristic.

**Living income and wages:** We are committed to ensuring that workers throughout our supply chain receive a fair living income. To uphold this principle, we are dedicated to paying the prices and costs necessary to enable our suppliers to compensate their workers fairly. This commitment extends beyond our direct operations, reflecting our responsibility to support the well-being of everyone in our value chain.

**Safe working conditions:** We believe that every worker deserves to work in a setting that is free from hazards and risks. To achieve this, we are committed to working closely with our suppliers to enforce strict safety standards and protocols. This includes regular audits, compliance with international safety regulations and continuous improvement initiatives.

## OUR CONSUMERS

**Right to health:** Respecting our consumers' human rights is an essential part of our efforts, especially in relation to the safety of our products and the potential impact on our consumers' right to health. We commit to ensuring that our products are safe for the intended consumer use.

**Right to information:** As a company dedicated to consumer rights, we recognise the importance of the right to information. Providing transparent and accurate details about our products, such as ingredients, origin and potential risks, empowers consumers to make informed choices. By fostering an informed marketplace, we support consumer autonomy and encourage responsible decision-making.

**Privacy and data protection:** Consumers trust us with their personal information, and we are committed to respecting their privacy and the security of their information. Strict procedures are implemented at every step in the handling of personal data from the initial gathering to use, retention and sharing. Those actions are limited to what is truly necessary and is proportionate to a legitimate goal.

**Right to fair and responsible marketing:** As a manufacturer and retailer of beauty and wellness products, we actively work to remove racial, gender and socioeconomic stereotypes in the marketing and advertising of our products. We challenge societal norms by being more inclusive when considering gender, race, class and sexuality in our communications.

## OUR COMMUNITIES

**Good living conditions:** As a cosmetics company with operations that affect communities, we recognise our responsibility to ensure environmental sustainability and promote good living conditions along our value chain. We are committed to partnering with stakeholders who share our dedication to minimising environmental impact, including air and water pollution. Through sustainable practices such as resource conservation, pollution prevention and ecosystem protection, we aim to safeguard the health and well-being of communities and the natural environment they rely on.

## IMPLEMENTATION AND DUE DILIGENCE

**Implementation:** In line with our commitment to respect human rights, L'OCCITANE Group has established robust procedures for the implementation of this policy throughout our operations and value chain. This policy is publicly accessible on L'OCCITANE Group's corporate website for external stakeholders, suppliers and business partners. It is also available through the company's internal communication channels. In addition, each manager is responsible for ensuring that employees are aware of, understand and adhere to this policy.

**Due diligence – access to grievance:** We recognise the importance of conducting due diligence to identify, prevent, mitigate and account for potential adverse human rights impacts associated with our activities. To this end, we have integrated human rights considerations into our decision-making processes, from strategic planning to daily operations. Our due diligence efforts encompass comprehensive risk assessments, stakeholder engagement, supplier evaluations and ongoing monitoring and review mechanisms. Through these measures, we

strive to uphold the principles outlined in international human rights standards and ensure that our business activities contribute positively to the well-being of individuals and communities affected by our operations. Our grievance management process is an integral part of our commitment to human rights. When L'OCCITANE Group identifies human rights impacts directly associated with its business relationships, it will leverage its influence to promote human rights compliance among suppliers and business partners. This may involve implementing corrective action plans or, if necessary, terminating the relationship.

**Due diligence – access to remedy:** Aligned with our Speak Up Policy and our commitment to transparency and accountability, we have established a whistleblowing mechanism that has been implemented throughout our value chain. This channel, publicly accessible on our corporate website, is aimed at collecting notifications regarding potential or actual violations of our policy commitments, particularly concerning human rights issues. The L'OCCITANE Group ensures that employees and external third parties such as business partners and suppliers have access to an anonymous, confidential and secure process for reporting grievances through a whistleblowing system operated by an independent third party. This system is available to all individuals across the company's value chain. The company is committed to thoroughly investigating these issues and providing appropriate responses and remedies.

**Governance:** L'OCCITANE Group's Human Rights Policy has been overseen and approved by our Chairman and by our Chief Executive Officer. To ensure the effective implementation of our Human Rights Policy across all our operations and with our partners, we have established a Business and Human Rights taskforce. This taskforce is dedicated to monitoring priorities and tracking progress in our human rights initiatives.

**Reinold Geiger**  
**Chairman**  
**L'OCCITANE Group**

**REVISION HISTORY**

Date	Release	Author	Tracking notes
October 2024	1.0	Responsible Procurement department	Initial release