



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **INTRODUCTION**

At Clarins UK Ltd we are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. We recognise the responsibility that we share with our suppliers and partners to buy materials and sell our products in an ethical manner. As far as reasonably practicable we require our Partners and Suppliers to uphold our strict ethical values and demonstrate transparency within their supply chains.

### **ORGANISATION STRUCTURE**

Clarins UK Ltd is part of the Clarins Group of Companies; the headquarters are based in Paris, France. Clarins Group, trading as Clarins, Mugler and Azzaro is a French luxury cosmetics company, which manufactures worldwide prestige skincare, cosmetics and fragrances, usually through high-end department stores and selected pharmacies.

### **OUR BUSINESS**

Clarins is a family owned company who are a World Leader in cosmetics, skin care, make-up and fragrance, and a major fashion player. Our brands include Clarins, Mugler, My Blend and Azzaro and are distributed in over 150 countries.

At Clarins Group, Responsible Development is a continuous approach to improvement; deeply rooted in the development of the company since its origin that aims to promote the economic, environmental and social performance of the company in order to build a better, sustainable world for everyone, everywhere.

We pride ourselves on our work to help enhance economic, environmental and social performance.

Social performance covers all actions that target social progress; human rights, improving living conditions and health (access to water, nutrition), job creation, respect for staff & partners and knowledge exchange. Social performance is where we seek to help abolish modern slavery and human trafficking.

## **OUR POLICIES THAT HELP TO PREVENT MODERN SLAVERY AND HUMAN TRAFFICKING**

Clarins UK has built their business based on integrity and trust incorporating high ethical trading standards. We operate the following policies that support the identification of modern slavery and help to combat human trafficking:-

**Whistleblowing Policy** - Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. All workers are required to be watchful for illegal or unethical conduct and are required to report any such activity. Our policy aims to make it easy for workers to make disclosures without the fear of reprisal. Employers, customers or others who have concerns can contact our Human Resources department or our Whistleblowing helpline on 0800 374 199, on-line <https://www.expolink.co.uk/whistleblowing-hotline/submit-a-report>

At Clarins (UK) Ltd we are committed to conducting business with honesty and integrity. We expect all employees and other individuals performing functions in relation to the organisation, such as agency workers and contractors, to uphold our ethical standards and values. It is important to Clarins that any fraud, unethical conduct or wrongdoing by workers or individuals associated to the organisation is reported, investigated and properly dealt with. Individuals are encouraged to raise any concerns that they may have regarding any illegal and unethical conduct taking place within our organisation.

Clarins' employees/workers in the first instance should raise their concern with their line manager unless they reasonably believe that their line manager is involved in the wrongdoing, or for any reason do not wish to approach the line manager. In this instance they can report their concerns to the HR department or use the external whistleblowing mechanism detailed below.

### **What type of things can I report?**

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- any instances of bribery;
- a breach of any other legal obligation; or
- concealment of any of the above;

*Please note that if you are an employee and your concern does not relate to the above it may be more appropriate to deal with it under the grievance procedure, if you are unsure as to what process to follow please contact HR on 020 7307 6700*

## How can I make a report?

- Telephone our free whistleblowing line on **0800 374199**
- Online by visiting;  
<https://www.expolink.co.uk/whistleblowing-hotline/submit-a-report>
- Or you can download the “SpeakingUp” app  
To download the app go to your Itunes & App store (for Apple users) or Playstore (Android users), search the app and press download

## What will happen after I made a report?

Any matter raised will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the individual who raised the issue.

When making a report you may choose to remain anonymous, however you will be encouraged to provide your name and contact details this is to help make the subsequent investigation as effective as possible, and so we can keep you up to date with progress.

## Our independent ‘speak up’ helpline

This confidential helpline is run by Expolink, our third party providers, to ensure that any concerns about malpractice in the workplace are raised and addressed appropriately.

**Code of Conduct** - All company employees must behave honestly, ethically and lawfully during the course of their employment. Employees have a duty to report any evidence of dishonest or improper activities to Management.

**Procurement Code** - Clarins UK is committed to ensuring that its suppliers and partners adhere to the highest standard of ethics. All of our suppliers are required to demonstrate their commitment to corporate social responsibility and this is tested as part of the tender and selection process. We build lasting relationships and work closely with our partners and suppliers to ensure that they uphold the Clarins values.

**Recruitment/Agency & Contract Workers Terms & Conditions** - All of the recruitment agencies and contractors that we work with are reputable. We undertake checks to understand what workers will actually be paid by fully understanding the breakdown of agency and contractor margins. This allows us to ensure that there is a fair rate of pay for anyone who carries out work for us. We also conduct rigorous checks on the right to work in the UK.

## **DUE DILIGENCE**

We undertake due diligence when selecting new suppliers or when entering partnerships to ensure that Clarins UK high ethical standards are upheld. We also actively manage contracts and monitor existing supplier's performance to provide assurance that our standard requirements are upheld.

This includes checking for general legislative compliance of labour standards and fair rates of pay to safeguard against modern slavery and human trafficking.

If we have to source goods from outside the UK and EU where there is a higher risk of slavery and human trafficking; we will where possible work in partnership with companies who hold SA8000 certification or subscribe to the IMO Fair For Life programme. This helps to provide assurance of the company's commitment to human rights, workers conditions and the provision of the living wage.

Clarins UK will not knowingly work with or award contracts to Suppliers who cannot commit to supporting the eradication of modern slavery and human trafficking.

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values in this regard.

We encourage anyone, including colleagues, subcontractors, suppliers, customers and clients to report in good faith any issues or concerns about potential unethical business practices. These can be reported to the Human Resources Director or the Statutory Officer.

## **TRAINING & RAISING AWARENESS**

Clarins UK aims to raise awareness and train all staff involved in procurement and supply chain activity to ensure that they understand and have an awareness of:-

- The basic principles of the modern slavery act.
- The conditions and impact of unrealistically low prices and extremely tight deadlines that give rise to the increased risk of slavery and human trafficking.
- How to raise potential slavery and human trafficking issues to the relevant people within the organisation
- What external help is available e.g. The modern slavery helpline

**This statement is made pursuant to section 54(1) of the modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December, 2016.**

A handwritten signature in cursive script, appearing to read "D. Lewis".

**SIGNED:**

**POSITION: Managing Director, Clarins UK Ltd**

**Date: 20<sup>th</sup> December, 2016**