

TRINNY LONDON

TRINNY LONDON LIMITED MODERN SLAVERY STATEMENT

Introduction

At Trinny London Limited (Trinny London), we are committed to combating slavery and human trafficking in our business and supply chain. We respect the human rights of our employees, suppliers and the communities in which we operate. We are committed to upholding the principles contained in the UK Modern Slavery Act 2015.

About us

Trinny London is a premium beauty brand with our head office in the UK and operations in the UK, Ireland, the USA and Australia. We have over 200 employees worldwide.

Our supply chain is based in the UK, Italy, China and South Korea.

Policies

As part of our commitment to combat modern slavery, we have put in place the following policies within our business:

- a. Supplier Code of Conduct¹;
- b. Modern Slavery Policy²;
- c. Whistle Blowing Policy;
- d. Dignity at Work Policy;
- e. Equal Opportunities Policy; and
- f. Health and Safety Policy.

Supplier Code of Conduct

Corporate integrity, responsible sourcing and the safety and wellbeing of workers in the countries where we do business are of paramount importance to Trinny London. Our Supplier Code of Conduct establishes the minimum standards that must be met by any entity that supplies products or services to Trinny London.

The Supplier Code of Conduct requires that suppliers be in full compliance with all applicable governmental, legal, regulatory, and professional rules and regulations including laws related to slavery, human trafficking and child labour.

With effect from 25th June 2024, we will require all existing and new suppliers to sign an acknowledgement that they have received the Supplier Code of Conduct, understand its contents and agree to comply with its terms.

We will take steps to ensure that all our suppliers comply with our Supplier Code of Conduct. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a material failure to comply with our Supplier Code of Conduct, we will consider seeking to terminate our relationship with the relevant supplier.

¹ Adopted on 25th June 2024

² Adopted on 25th June 2024

Supplier Due Diligence

We undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers to identify areas of potential risk and reduce the risk of slavery and human trafficking occurring in our business and supply chains. Our due diligence and reviews may include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including requiring them to implement action plans;
- using ethical supplier databases, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with action plans or seriously violate our supplier code of conduct, including the termination of the business relationship.

Employee Handbook

Trinny London is committed to the highest standards of professional and personal conduct. All employees and officers of the company are expected to conduct themselves in accordance with the policies set out in the Employee Handbook and to generally behave in a socially responsible and fair manner and with uncompromising ethics and integrity.

All new staff must sign an acknowledgment that they have received the Employee Handbook, understand its contents, and agree to comply with its terms throughout their employment.

The Employee Handbook includes Trinny London's Modern Slavery Policy, Whistle Blowing Policy, Dignity at Work Policy, Equal Opportunities Policy and Health and Safety Policy.

Staff Training

We will be undertaking staff training to raise awareness of modern slavery issues by 30th September 2024.

Our modern slavery training will cover:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chain.

Board Approval

This statement was approved on 25th June 2024 by Trinny London's board of directors. This statement will be reviewed and updated annually.

Director's signature:

Director's name: Trinny Woodall

Date: 25th June 2024

A handwritten signature in black ink that reads "Trinny Woodall". The signature is written in a cursive style with a long horizontal stroke at the beginning of the first word.