



# Charlotte Tilbury

## MODERN SLAVERY STATEMENT 2020

### Introduction

To continue to be one of the world's most successful beauty brands, the prevention of slavery and human trafficking is high on our agenda. We care deeply about the well-being of our employees, contractors and those in our supply chain. This modern slavery statement ("**Statement**"), which will be the third published by the Charlotte Tilbury Group, is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("**Act**") and demonstrates our continued commitment and understanding of the importance of ensuring that none of our employees, contractors or supply chain partners is or becomes a victim of modern slavery. We do this through the Charlotte Tilbury Code of Conduct ("**Code of Conduct**") and are committed to building on this and monitoring it going forward as the Charlotte Tilbury Group grows.

This Statement is made on behalf of Islestarr Holdings Limited ("**IHL**") and its group companies (together, the "**Charlotte Tilbury Group**") and sets out the steps taken by the Charlotte Tilbury Group of companies to prevent modern slavery and human trafficking in its business and supply chains during the financial year ending 31st of December 2019. IHL is a private limited company registered in England and Wales with registered number 07712458. The IHL board of directors has approved this statement.

### Our Business

We are the brand behind one of the top make-up artists in the world and a global provider of luxury beauty, skincare and perfume products that has been shaking up the beauty industry since 2013.

The Charlotte Tilbury Group has over one thousand employees globally, combining a mix of both Head Office and Retail employees. The Charlotte Tilbury Group operates in the UK, Asia, Europe, the Middle East, and North America through 5 of our own stores and concessions within 18 third party retailers. The Group has a global annual turnover of over £145 million (as at 31 December 2018).

We endeavour to work with the best manufacturers and suppliers to produce our luxury beauty and skincare products. Our supply chain currently includes 5 third party logistics companies; 2 freight companies; and 39 contract manufacturers and suppliers of components, consumables, and retail tools, globally who are some of the best in the industry. We value long-term relationships with these suppliers, with a current average relationship length of 3.5 years as at the date of this Statement. We are currently sourcing our products from manufacturers in the following countries:

- United Kingdom
- Hong Kong
- Germany
- Italy
- France
- Czech Republic
- China
- United States
- South Korea
- Switzerland
- Spain
- Canada



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## The Charlotte Tilbury Beauty Code of Conduct

While our overriding aim is to continually disrupt the beauty industry through our core values, innovative approach and high quality inimitable products, we always want to do this in a considerate way and take into account our social and moral obligations to all of our employees, contractors and business partners. We have therefore developed our robust Code of Conduct setting out our ethical trading and fair working standards. It also sets out our expectation that all staff, suppliers and third party business partners will comply with the Act. The Code of Conduct was developed by our internal Legal team in consultation with the business and approved by the IHL board of directors.

The Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The Code of Conduct will be reviewed each year, in line with the Charlotte Tilbury Group's Statement, to ensure both the **Code of Conduct** and the Statement adequately reflect the Charlotte Tilbury Group's position on slavery and human trafficking.

## Our Supply Chains

A number of our suppliers, manufacturers and third party business partners are established businesses themselves, with their own policies on anti-slavery and ethical trading. We also issue them with a copy of our Code of Conduct and expect them to abide by it during their business relationship with us. In 2020 we are implementing Supplier Executive Review meetings with our largest Suppliers ("**Key Suppliers**"), which shall include a regular agenda item to discuss their conformity to our Code of Conduct and steps they have taken or are taking for implementing like-for-like initiatives in relation to modern slavery to reduce the risk of its occurrence in their business and supply chain. From each Key Supplier we expect to see a modern slavery strategy and the road-map to implement this strategy.

To the extent we don't already do this, we will include a provision in all our contractual arrangements with suppliers that requires them to comply with all applicable legislation which expressly includes the Act and all anti-slavery and human trafficking legislation. This is in respect of all contractual arrangements commencing from 2020. We are also instating a retrospective review of existing contracts with Key Suppliers to identify if relevant provisions relating to the Act and anti-slavery and human trafficking legislation need to be added or updated by way of addendum to the contract. We are also reviewing our due diligence process for on-boarding new suppliers, to ensure we are putting in place the most effective requirements on and asking the correct questions of new suppliers.

During 2019 we secured declarations for responsible Mica use from 90% of manufacturers of finished goods within our supply chain. We shall continue to keep this under review in 2020. During the course of 2019 / 2020 we commenced visits to Key Suppliers, which included our observance and review of their conformance with the Act. Due to Covid-19 preventing further Key Supplier visits, CT has taken the opportunity to review how we monitor supplier conformance with the Act. During 2020/2021 we will be conducting a segmentation exercise of Key Suppliers to identify the most effective way to engage with them and monitor their conformance. We will consider factors such as whether they are a full-service Key Supplier; geo-location; risk profile; products they supply and where they source components. From the segmentation exercise we will determine the most appropriate approach to reviewing their conformity on a case by case basis, which may include: (1) site visits; and/or (2) audits by way of desktop assessments (carried out by Charlotte Tilbury Group or third parties); and/or (3) review of available on-line third party audits from reliable sources; and/or (4) reliance on internal and third party know-how, advice on and experience with Key Suppliers.



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## **Training**

In 2020 we are working on extending our internal training programme to deliver training and education to all Charlotte Tilbury Group employees on recognising potential slavery and human trafficking in the workplace or amongst our suppliers, and what to do with this information. We will review external training suppliers with expertise in the field of ethical compliance, to deliver training to relevant senior stakeholders within the business, with a view to rolling out learnings business-wide. The People team have created a Confidential Concerns Policy which, amongst other things, aims to protect any members of staff who do encounter slavery and human trafficking and want to report it.

### **Charlotte Tilbury Beauty Staff**

We are committed to maintaining a culture of teamwork and empowerment based on inclusion, mutual respect and trust. Our employees are the greatest advocates for our brand and we want them all to feel valued and an integral part of the Charlotte Tilbury journey. The Code of Conduct has been issued to all staff and is available to view on the Charlotte Tilbury Group intranet, and any updates to the Code of Conduct as part of the annual review will be notified to employees. All new joiners will receive a copy in their Charlotte Tilbury welcome pack.

Our training programme is being developed for the benefit of all our staff. Coupled with the Confidential Concerns Policy and Code of Conduct we hope that all Charlotte Tilbury Group staff will then have the necessary skills to identify modern day slavery and feel encouraged to report any instances of slavery and human trafficking without the fear of adverse consequences for them.

## **COVID-19**

We are conscious of and regularly monitoring the global impact of COVID-19 and the far-reaching impact on our own employees and those within our supply chain. We have temporarily closed our own offices, stores and concessions in impacted areas, in accordance with governmental guidelines and for the protection of our employees. Where available, we have implemented government-backed financial support to our employees who are currently unable to work due to the impact of COVID-19. For those employees able to work, we have taken steps to support their well-being including ensuring that they have access to required resources in their home-working environments; processes to enable them to reach out for help during this time, and providing regular updates on the company position and communications for well-being during this period.

We have reached out to our Suppliers to identify measures that have been taken to protect their own employees and employees within their wider supply-chain during COVID-19. In particular, we have: (1) put in place daily calls with our distribution centres to assess the situation and manage the implementation and ongoing monitoring of social distancing measures to protect their employees; and (2) worked with Suppliers to successfully manage any delays identified in the component to finished goods sourcing in response to various markets openings/closures. We have consciously not placed undue pressure on our supply-chain for delivery and performance, that could flow-through to their employees. We continue to work with our same Suppliers, conscious that exiting out existing Suppliers could impact negatively on their employees during this period of global unrest.

## **Going Forward**

We will continue to build on the steps we are currently taking to ensure that there is no slavery or human trafficking in any part of our business. In our Modern Slavery Statement for financial year 2021 we will aim to report on the effectiveness of our supplier engagement, internal training and use the insight and



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experience we gain each year to continue to effectively combat modern slavery and protect vulnerable workers.

**Demetra Pinsent**  
CEO  
21 June 2020