

ESTÉE LAUDER COMPANIES

*MODERN SLAVERY  
STATEMENT*

December 31, 2025

# Contents

- Introduction .....2**
- Respect for Human Rights .....3**
- Organizational Structure and Supply Chains.....3**
  - Business Structure .....3
  - Employee Population.....4
  - Supply Chain .....4
  - Sourcing Responsibly .....5
- Policies in Relation to Modern Slavery and Human Trafficking .....6**
  - Employee Code of Conduct .....6
  - Human Rights Policy .....6
  - Supplier Code of Conduct .....7
  - Supplier Sustainability Guidelines.....8
- Supplier Due Diligence and Risk Assessment .....9**
- Accountability .....10**
  - Addressing Risks.....10
  - Assessing Effectiveness .....11
  - Remediation.....12
- Employee Education and Training.....12**
  - Training .....12

## Introduction

As we (The Estée Lauder Companies or ELC)<sup>1</sup> approach our operations and our supply chain, we aspire to foster respect for people and the environment and to be a positive influence in every community in which we operate and from which we source. This Modern Slavery statement outlines the actions undertaken in the fiscal year ended June

---

<sup>1</sup> ELC, we, us, and our refer to The Estée Lauder Companies Inc. and its subsidiaries. In the case of recently acquired subsidiaries or businesses (e.g., DECIEM), application of this policy will be subject to a transition period, the length of which will depend on the status and capabilities of the acquired businesses and/or entities. As part of an overall integration plan, ELC would bring non-shared suppliers (i.e. suppliers not already covered by ELC’s program) into ELC’s program. As such, there may be a gap in some elements of the program as the onboarding and integration plans take place.

30, 2025, to identify and minimize risks relating to modern slavery in our business and enterprise.

As a global company, we comply with laws and regulations where we conduct business. We also look to those who provide us with services or goods (collectively “suppliers”) to operate in compliance with all applicable laws, including, but not limited to, supply chain integrity, employment laws pertaining to forced labor and human trafficking, child labor, minimum wages, overtime compensation, hiring, and occupational safety.

This statement outlines our approach to respect human rights across our global operations and supply chain and aligns with these international protocols:

- United Nations Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights

This Modern Slavery statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, and the California Transparency in Supply Chains Act.

## Respect for Human Rights

ELC respects human rights across our global operations and supply chain. The UN Guiding Principles on Business and Human Rights provide a framework to help us identify and prioritize our human rights risks and impacts. Proactive human rights due diligence is an ongoing process, and we have policies, processes, training, and systems in place to identify, assess, monitor, and mitigate or eliminate actual or potential human rights impacts.

We are required by the aforementioned Guiding Principles and regulations to disclose publicly the steps we are taking to identify and eradicate forced labor and human trafficking in our supply chains. The following describes ELC’s relevant global commitments and initiatives.

## Organizational Structure and Supply Chains

### Business Structure

ELC is one of the world’s leading manufacturers, marketers, and sellers of quality skin care, makeup, fragrance, and hair care products. Established in New York in 1946, the company’s products are now sold in approximately 150 countries and territories under

brand names including: Estée Lauder, Aramis, Clinique, Lab Series, Origins, M·A·C, La Mer, Bobbi Brown Cosmetics, Aveda, Jo Malone London, Bumble and bumble, Darphin Paris, TOM FORD, Smashbox, AERIN Beauty, Le Labo, Editions de Parfums Frédéric Malle, GLAMGLOW, KILIAN PARIS, Too Faced, Dr.Jart+, and the DECIEM family of brands, including The Ordinary and NIOD.

ELC has three main geographic regions: Asia/Pacific; Europe, the Middle East & Africa (EMEA); and The Americas. Each region is composed of one or more affiliates. Today we have affiliates in 50+ countries and territories.

Our products are sold on our own and authorized retailer websites, on third-party online malls, in stores in airports, in duty-free locations and in our own and authorized freestanding stores. In addition, our products are sold in brick-and-mortar retail stores, including department stores, specialty-multi retailers, upscale perfumeries and pharmacies and prestige salons and spas.

## Employee Population

With approximately 60K employees worldwide, we recognize that in order to properly serve the communities in which we live and work, our workforce and products must reflect and represent this global diversity.

ELC strives to promote an environment that is free from discrimination and inclusive of all people and their unique abilities, strengths and differences. ELC provides equal opportunities in all aspects of employment and does not subject workers to any discrimination with regard to recruitment, hiring, remuneration, promotion, access to training, professional development, retirement or termination. Any employment decisions must be based on a worker's ability and not on personal characteristics such as race, creed, color, religion, gender, sex, age, national origin, alienage or citizenship status, sexual orientation, gender identity or expression, marital, partnership or familial status, disability, genetic information, veteran/military status, domestic violence victim status, social background, caste, health status, pregnancy, or any other characteristic protected by law. Workers with the same qualifications, skills, experience and performance should receive equal pay for equal work, as required by local law.

## Supply Chain

Our Global Supply Chain includes a vast network of direct and indirect suppliers (collectively, "ELC Suppliers") through which we purchase materials and services that are an integral part of our operations. Our direct supply chain is comprised of suppliers that directly contribute to ELC's products, packaging, and/or production, such as those that provide the raw ingredients for our product formulations, the materials that contribute to

our packaging solutions, and third-party manufacturers. Our indirect supply chain is composed of suppliers who sell us goods and services not directly used in the manufacturing of our products, such as creative partners, stores/visual merchandise, IT services and more. We aim to develop long-lasting, trusting, and mutually beneficial relationships with a common basis of shared values and commitment to operating responsibly and ethically.

Our Global Supply Chain includes our world-class Manufacturing and Fulfillment, Distribution and Logistics, and Procurement and Planning operations. The collective team plans, crafts, and delivers the highest quality products and packaging for our consumers around the world. The Global Supply Chain partners closely with Global Research and Development (R&D)/Innovation as an end-to-end supply chain, which encompasses the lifecycle of the company's products – from inception to delivery to our consumers' hands. Underpinning the supply chain are shared teams that ensure the quality, sustainability, safety, and innovation that spans across all that we do.

We manufacture our products primarily in our own facilities in the United States, Belgium, Switzerland, Japan, the United Kingdom, and Canada, while also leveraging global third-party manufacturing networks. We continue to evaluate our manufacturing facilities and processes and identify sourcing opportunities to improve innovation, increase efficiencies, minimize our impact on the environment and the communities where we operate, ensure supply sufficiency, and reduce costs.

## Sourcing Responsibly

As a condition of doing business with ELC, we expect our suppliers to honor our company values and our commitment to operating as a responsible and sustainable corporate citizen. In partnership with our suppliers and communities, we are committed to compliance with the law, ethical business practices, and fostering our heritage of respect for people and the environment and serving as a positive influence in the communities we serve and from which we source.

ELC sources high-quality ingredients and materials from around the world to manufacture our products, working diligently to source responsibly and with attention to potential impacts on people and environment. We collaborate with a wide and diverse network of suppliers. In doing so, we aim to continuously improve and strengthen our sourcing practices while remaining sensitive to the local communities in which we operate. Our policies and programs embody our deeply held values and long heritage of responsibility.

Our Responsible Sourcing team is part of our Global Procurement organization and broader Global Supply Chain function. The team works closely with the Global R&D, Global Corporate Citizenship and Sustainability, Packaging, and Legal functions. The team establishes, implements, and monitors environmentally and socially responsible and

ethical sourcing practices to ensure that performance is aligned with our goals and objectives. We collaborate with our brands, suppliers, industry groups, NGOs, government agencies, and peers to continuously advance our practices.

We aim to support businesses owned by a wide cross-section of individuals. Our objective is to ensure that our suppliers reflect our broad consumer base. In fiscal 2025, we continued to identify, qualify, and help to grow a broad array of suppliers, including small businesses, to ensure operational excellence. We also continued to leverage toolkits and enhanced resources to help brands, regions, and functions find and consider a more expansive cross-section of suppliers.

## **Policies in Relation to Modern Slavery and Human Trafficking**

We are committed to transparency in how we uphold human rights across our operations and value chain. By clearly outlining our policies and actions, we aim to foster trust with stakeholders and demonstrate accountability in addressing human rights risks.

### **Employee Code of Conduct**

Our Employee Code of Conduct (CoC) outlines our expectations for promoting a respectful workplace, engaging in ethical business practices, and operating in a socially responsible and fair manner. We require our employees, service providers, and suppliers to operate in compliance with applicable laws, including, but not limited to, employment laws pertaining to child labor, minimum wage, overtime compensation, hiring, and occupational safety. Our CoC is available [here](#).

In fiscal 2025, we developed a human rights section and accompanying training to be embedded into our CoC. This training will launch in fiscal 2026.

### **Human Rights Policy**

We have conducted a corporate-level Human Rights Assessment (HRA) based on the methodology outlined by the UN Guiding Principles on Business and Human Rights, the global standard for HRAs. Through the HRA process, we assessed human rights risks and impacts across our operations, including our corporate policies and procedures, as well as our supply chain, manufacturing, and retail operations. The HRA has provided us with a framework to help identify and prioritize our salient human rights risks and impacts, and to identify key actions for improvement. Our salient human rights risks are:

- Access to Grievance Mechanisms
- Child Labor and Juvenile Work

- Discrimination and Equality
- Forced Labor and Modern Slavery
- Freedom of Association
- Harassment and Gendered Impacts
- Impacts on Local Communities
- Occupational Health and Safety
- Privacy
- Working Hours, Wages and Benefits

Our Human Rights policy, available [here](#), applies to all ELC employees, locations, operating companies and employees of subsidiaries and joint ventures in which we hold a majority interest. We also expect our suppliers to respect human rights in their own operations and supply chains. We promote a culture of uncompromising ethics and integrity and put forth standards to uphold the principles and ideals that make us a global leader in prestige beauty. We have tailored approaches for various stakeholder groups that focus on key risks and opportunities.

## Supplier Code of Conduct

Our Supplier Code of Conduct (“SCoC”) is the foundation of our program to source responsibly. It outlines our expectations for suppliers with respect to human rights; safe, healthy, and equitable workplaces; and the protection of the environment and local communities. The SCoC, which is aligned with ELC’s Code of Conduct, as well as ELC’s Human Rights Policy, follows internationally recognized standards, including the Universal Declaration of Human Rights, the International Labor Organization’s (ILO) Conventions and the ILO Declaration on Fundamental Principles and Rights at Work, is organized into three sections:

- Engage in lawful and ethical business practices
- Promote a respectful, fair, and diverse workplace
- Provide a safe, healthy workplace and protect the environment and community

In conjunction with our standard purchasing contracts, the SCoC requires that suppliers be in full compliance with all applicable governmental, legal, regulatory, and professional rules and regulations governing wages, privacy and confidentiality, work hours, overtime compensation, hiring, occupational safety, forced and/or child labor, and freedom of association. This policy sets forth the basic requirements we expect of suppliers, including vendors, service providers, independent contractors and consultants, as a condition of doing business with ELC. To meet the needs of our global network of suppliers, our SCoC is available in several languages.

The SCoC specifies that ELC Suppliers must not employ child labor, that is any person employed under the age of 15 (or 14 where the law of the country permits) or under the minimum age for employment in the country, whichever is greater. ELC Suppliers employing young workers (workers above the minimum age of employment but under the age of 18) must comply with applicable laws and regulations regarding hours and compensation. Young workers must not be engaged in hazardous work or night work or subject to conditions or restrictions that could be harmful to their mental and physical development, health, safety, morals and education. These same expectations are upheld at all ELC owned and operated sites.

The SCoC also specifies that ELC Suppliers must not use or benefit from any form of human trafficking, or forced or compulsory labor of any kind, be it prison, bonded, indentured or otherwise. Furthermore, mandatory overtime is not permitted, and workers must be allowed to leave their employment after giving reasonable notice. Imposing monetary fines, withholding identity papers (such as passports), work permits, remuneration or requiring recruitment deposits or other constraints as a condition of employment, is not allowed.

In fiscal 2025, we evaluated our SCoC to align with evolving stakeholder expectations, evolving regulatory requirements, and to address new and emerging ESG matters. Stakeholders included internal teams within Global Supplier Management, GCCS, Environmental Affairs & Safety, Legal, Global Communications, and Global Public Affairs. Externally, stakeholders included select NGOs and select strategic direct and indirect suppliers. The updated SCoC will be published and communicated in fiscal 2026. In addition to our SCoC, our Supplier Sustainability Guidelines provide suppliers with practical actions they can take to manage the environmental and social impacts of their own operations.

Our Tier 1 direct and indirect suppliers and select Tier 2+ direct suppliers acknowledge to comply with our SCoC, or an equivalent. Suppliers representing approximately 99% of our direct spend have acknowledged compliance with the SCoC.

## Supplier Sustainability Guidelines

In addition to the SCoC, our Supplier Sustainability Guidelines provide suppliers with practical actions they can take to manage the environmental and social impacts of their own operations. These Guidelines help suppliers to build on the foundation and standards of the SCoC requirements and apply to its business sustainability and human rights best practices and continuously improve.

Supplier Sustainability Guidelines can be found [here](#).

## Supplier Due Diligence and Risk Assessment

We take a risk-based approach to supplier due diligence. We conduct due diligence as part of new supplier qualifications and assess risk of existing direct and indirect suppliers annually. We risk-rank direct and indirect suppliers globally based on pre-established criteria, such as location of operations, type of goods or services being sourced, and potential impact to our business.

To help us determine location and goods and services risks, we use a third-party provider that assesses social impact and sustainability topics including environment, health and safety, social issues, and human rights risks. Based on the resulting risk ranking of the supplier, we conduct additional due diligence using third-party on-site audits or assessments, as appropriate.

We are continuously working to strengthen our supplier monitoring and compliance program to ensure adherence to the SCoC and pay careful attention to potential risks. In addition, we monitor supplier performance and implement corrective action plans as needed.

Our suppliers are expected to make all reasonable efforts to communicate our SCoC or Supplier's equivalent code to their workers, as appropriate, in a language they understand, and provide workers with the opportunity to ask questions and raise concerns. ELC Suppliers are required not to engage in any form of retaliation or discrimination against anyone who in good faith raises questions or concerns about a potential violation of the Supplier Code, the Supplier's equivalent code and policies or the law, or who assists in an investigation of a reported violation. Included within our SCoC, The Estée Lauder Companies' Integrity Helpline provides a direct line for suppliers to raise questions or concerns about conduct that may be inconsistent with the law, our SCoC, or other policies.

ELC approves new suppliers or new manufacturing plants after suppliers meet the requirements set forth in the SCoC evaluation process, which requires all ELC Suppliers to sign the SCoC and applicable ELC Suppliers to complete an assessment or on-site audit. ELC then contracts with third parties to conduct on-site audits for ELC Suppliers that are selected based on criteria such as geography, type of material, and impact to the business. ELC also regularly assesses certain ELC Suppliers against environmental and social criteria using a third-party sustainability ratings platform to drive continuous improvement.

## Accountability

We promote a culture of uncompromising ethics and integrity with standards to help us uphold the principles and ideals that make us a global leader in prestige beauty.

We expect our employees and business partners to conduct business in compliance with applicable laws and regulations and with the high ethical standards and policies set forth in our CoC and SCoC.

Our CoC helps to protect our reputation as an ethical corporate citizen. Newly hired employees are required to sign an acknowledgement that they have received, read, and will comply with the Code. In addition, annually, employees above certain levels are required to complete code of conduct training and acknowledge the code. From time to time, we conduct additional trainings on the Code for groups of our employees.

## Addressing Risks

Effectively addressing the challenges related to sustainable sourcing requires collaboration between governments, civil society, local communities, and private enterprise. As part of this process, we are committed to partnering with organizations that help us build and strengthen our sourcing strategies and participating in multi-stakeholder collaborative initiatives to ensure continuous improvements in our sourcing practices.

We participate in industry initiatives to encourage the sharing of information and best practices, especially as related to ingredient traceability and sourcing. We leverage TransparencyOne, a digital platform as part of the Traceability Alliance for Sustainable Cosmetics (TRASCE), that enables our suppliers to collect and share detailed supply chain mapping. This tool helps build a more complete view of our ingredient and packaging supply chains, enhancing visibility and accountability across multiple tiers.

We are also a member of the Harvesting the Future industry coalition comprised of suppliers, industry peers, local communities, and nonprofits. The coalition aims to strengthen human rights due diligence systems and improve labor conditions in sensitive supply chains such as Egyptian jasmine, and other botanical ingredients.

Jasmine is used as a fragrance component in select products across our portfolio. In recent years, there have been concerns of child labor in the jasmine industry in Egypt. ELC prohibits the use of child labor, and we believe the rights of all children should be protected. Our Supplier Code of Conduct includes our policy against the employment of children as a condition of doing business with our company.

As part of our coalition efforts related to Egyptian jasmine, we are contributing to funding interventions for vocational training, financial literacy, and entrepreneurship and social protection programs. To date, the coalition has supported the distribution of protective equipment, including headlamps, waterproof boots, and aprons, to over 7,500 jasmine pickers. Financial education and economic empowerment programs for jasmine pickers and workers have also been launched. The Harvesting the Future of Rose project primarily aims to enhance the working and living conditions of seasonal agricultural workers and support children's education among migrant families. Through funding from member companies of the coalition, the project focuses on developing support mechanisms for rose pickers, including the establishment of child-friendly spaces, training programs, and enhanced occupational health and safety measures. To read more about our activities around Egyptian Jasmine, please visit our Viewpoints web page.

## Assessing Effectiveness

We monitor our direct suppliers for adherence to our SCoC and pay careful attention to potential risks of noncompliance. We continue to advance our efforts to include our indirect supply chain in our monitoring.

To track supplier progress and performance, we use EcoVadis, an online ratings service, to help us assess Tier 1 and Tier 2+ direct and indirect suppliers on their environmental, labor and human rights, ethics and procurement policies, practices, and reported results. The EcoVadis tool ranks suppliers with numerical scores that reflect the maturity level of their sustainability programs, practices, and initiatives. We expect our direct strategic suppliers to achieve an “advanced” EcoVadis score and other direct suppliers to achieve at least a “satisfactory” score. We then use supplier EcoVadis assessment results to assess suppliers’ implementation of required practices and engage with direct suppliers to help them improve.

Our core due diligence team meets monthly to review progress, discuss complex cases, and align on enhancements to our supplier evaluation and monitoring program. On a periodic basis, we share insights with the broader Global Procurement team on trends and information derived from our supplier due diligence program. These actions, among others, help shape periodic enhancements or changes to our due diligence strategy.

In fiscal 2025, some findings included compliance gaps with health and safety, environmental, working hours, and wage and benefits requirements. If we determine that an ELC supplier is not in compliance, potential remedies may include, among other actions, the development and implementation of a corrective action plan within a specified timeframe or, if necessary, termination of the business relationship with ELC. To assess compliance, ELC may also follow up with an audit, as deemed appropriate.

## Remediation

We promote a speak-up culture and provide a mechanism for reporting suspected misconduct. The [ELC Integrity Helpline](#) is a resource available for employees, suppliers, customers, and other stakeholders to report conduct that may be illegal, unethical or a violation of our Code, Human Rights Policy, or SCoC. Concerns may be reported to the ELC Integrity Helpline via telephone or web, 24 hours a day, 7 days a week and in many languages.

We have standard operating procedures to manage reports to ensure consistent investigation and response procedures across incident types and reporting channels. Serious violations are reviewed by the company's Ethics and Compliance Committee, which oversees implementation of the Code.

We will not tolerate retaliation against anyone who in good faith raises questions or concerns about a potential violation of the law, our Code, or company policies, or who assists in an investigation of a reported violation. Retaliation in any form is itself a serious violation of our Code and is strictly prohibited. Acts of retaliation or potential retaliation should be reported immediately. Anyone found to have retaliated against an individual will be subject to disciplinary action, up to and including termination of employment.

For further information about our wider sustainability efforts, please see our latest Social Impact and Sustainability Report found [here](#).

## Employee Education and Training

### Training

In addition to the CoC training mentioned above, ELC provides a suite of internal training courses related to ethics, human rights, responsible sourcing, and social impact and sustainability. Targeted employees in functions with proximity to our human rights due diligence program are required to take a modern slavery prevention training module. This training course explains key concepts and warning signs associated with modern slavery and forced labor across companies and their supply chains, and outlines ELC's approach to modern slavery prevention, due diligence, and remediation.

We also lean on the tools of collaboration and partnerships to advance our responsible sourcing practices, and that includes bringing our employees along on our journey. ELC launched "**Sourcing Responsibly at ELC**", an E-learning program available on our internal ELC Learning Hub.

The primary objective of this course is to equip our employees with a comprehensive understanding of Sourcing Responsibly at ELC. Through this learning journey, participants are introduced to the internal and external initiatives undertaken by the Responsible Sourcing team, all of which are aligned with the core principles of ELC's Sourcing Responsibly Strategy.

In addition, our Social Impact and Sustainability Education hub is an online resource for employees to upskill on key social impact and sustainability topics, including Women's Advancement, Inclusion, Diversity & Equity, Generational Diversity and Leadership, Product Sustainability and Innovation, and Climate and Environment.