



Charlotte Tilbury

MODERN SLAVERY STATEMENT 2019

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 second 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 £153 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 31 manufacturers globally who are some of the best in the industry. We are currently sourcing our products from manufacturers in the following countries:

- 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

Several 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 2019 we have introduced as a regular agenda item in our quarterly Supplier Executive Reviews the requirement for a statement from a member of each supplier's senior management team that they conform to our Code of Conduct and are 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 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.

During the course of 2019 / 2020 we will be conducting supplier visits to ensure conformance with the Act.

Training

We are working on implementing an internal training programme that will be delivered to all Charlotte Tilbury Group employees on a regular basis. The aim of this programme will be to educate our employees on how to recognise any potential slavery and human trafficking in the workplace or amongst our suppliers, and what to do with this information. 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



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all staff and is available to view on the Charlotte Tilbury Group intranet. 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.

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 2019 / 2020 we will aim to report on the effectiveness of our and use the insight and experience we gain each year to continue to effectively combat modern slavery and protect vulnerable workers.

Demetra Pinsent
CEO
21 June 2019