



## L'Oréal Human Rights Policy

### CEO Foreword

As a global leader of the beauty industry, L'Oréal understands that acting with integrity is not merely an option, but a fundamental responsibility. We believe sustainable and meaningful business growth can only thrive in societies where Human Rights are respected, and companies actively contribute to positive social impact. This conviction serves as the foundation for our Human Rights Policy, which guides our actions and commitments to making a positive difference and sustain our business model.

As a company, we are aware that we can have an impact on people, communities and the planet, and it is our collective responsibility, to work towards respecting Human Rights. This means avoiding negative impacts on people and the planet, as a result of our activities.

The L'Oréal leadership team takes this responsibility very seriously, and we are committed to working in alignment with these principles every day.

We support our teams and external partners in the management of our salient Human Rights risks and monitor potential evolutions over time.

Respecting Human Rights contributes to creating the beauty that moves the world, the sense of purpose of our company

### Introduction

Our Human Rights Policy is grounded in our [Code of Ethics](#), particularly its 4 Ethical Principles - INTEGRITY, RESPECT, COURAGE, and TRANSPARENCY and reflects our commitment in line with the following international norms and standards:

- [International Bill of Human Rights \(Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights\)](#)
- The [International Labour Organization \(ILO\) Nine Core Conventions](#)
- The [ILO Declaration on Fundamental Principles and Rights at Work](#)
- The [OECD Guidelines for Multinational Enterprises](#)
- The [UN Guiding Principles on Business and Human Rights](#) (UNGPs)
- The [UN Global Compact](#)

L'Oréal may consider additional human rights standards, to account for people who are particularly vulnerable to impacts on their human rights.

We uphold the higher standards between national laws and international Human Rights. Where local law imposes higher standards than those set out in this Policy, local law will always apply. If, by contrast, this Policy provides for a higher standard, it will prevail. When faced with conflicting requirements between local law and internationally recognized Human Rights, we seek ways to honour these international standards.

## Rationale and scope

At L'Oréal, our longstanding commitment to respecting Human Rights is a continuous improvement journey. Our first dedicated Human Rights Policy was published in 2017. This updated 2025 version reflects our continued commitment to respecting Human Rights.

L'Oréal aims to meaningfully engage with internal and external stakeholders to understand their views and concerns. This covers potentially affected stakeholders, in particular the most vulnerable ones, and other stakeholders including business partners and civil society organizations. We recognize their essential role in informing our Human Rights Due Diligence, developing effective remedy mechanisms, and shaping our broader sustainability journey.

This Policy reflects the Group's salient Human Rights Risks.

The Policy benefits from the insights of key internal experts, namely from Sourcing, Corporate Affairs and Engagement, Human Relations, Diversity, Equity and Inclusion, Corporate Responsibility, Ethics, Marketing, Safety, Legal and Security. Several external stakeholders were consulted to develop this Policy (e.g. civil society organizations, international organizations).

This Policy is intended for all individuals and entities engaging with L'Oréal, including employees, business partners and consumers. For L'Oréal employee, a dedicated [Employee Human Rights Policy](#) sets out our commitments. In our supply chain, our partners, are required to commit to these standards by signing the [Mutual Ethical Commitment Letter](#) (MECL).

We expect our suppliers to apply these standards rigorously.

## Human Rights Norms We Uphold

This section outlines the Human Rights standards that L'Oréal upholds in our own operations and value chain. The implementation of these norms is set out in the "implementation" chapter.

### No Child Labor

L'Oréal rejects child labor in its own operations and across its value chain and is committed to upholding the principles enshrined in the [UN Convention on the Rights of the Child](#). L'Oréal adheres to all principles of international labor standards and national laws regarding the minimum age for employment, which in no case shall be lower than the age of completion of compulsory schooling, and below 15 years of age. Workers aged between 15 and 18 benefit from special working conditions that consider their age and educational needs. Carrying out of hazardous work (e.g. involving heavy loads, dangerous substances or machinery) or night work are prohibited for young workers.

In all circumstances, we uphold and prioritize the best interests of the child, with remediation processes designed for child protection and well-being.

### No Forced Labor

L'Oréal rejects all forms of forced and compulsory labor, as well as any exploitative labor practices within our own operations and across our value chain, as reflected in the [ILO Forced Labour Indicators](#). This includes, but is not limited to, human trafficking, modern slavery, debt bondage, restrictions on freedom of movement within the workplace, prison labor, involuntary overtime, withholding of wages, and the confiscation of identity documents. L'Oréal requires that workers are informed of their terms of working, through a contract written in a language they understand. We uphold the fundamental right of every individual to fair and humane treatment, as well as their right to rest and leisure. We are committed to upholding the [Employer Pays Principles](#), which entails that no candidates and workers pay any fees, expenses or deposits in connection with their employment.

## **Right to Equality, Non-Discrimination and Equal Opportunities**

At L'Oréal, we aim to be as diverse as the people we serve and prohibit and fight against all forms of discrimination based on gender, gender identity, sexual orientation, disability, age, political or philosophical opinions, religion, union membership, ethnic, social, cultural or national origin or on any other grounds prohibited by national law for our own operations and with our suppliers. In this regard, we are committed to upholding the principles of the ILO [Discrimination \(Employment and Occupation\) Convention](#), the UN [Convention on the Elimination of All Forms of Discrimination against Women](#), the UN [Convention on the Elimination of All Forms of Racial Discrimination](#), the UN [Convention on the Protection of All Migrant Workers and Members of Their Families](#).

We are particularly vigilant towards people and groups who are more likely to experience discrimination e.g. pregnant women, people with disabilities, members of LGBTQIA+ communities, refugees or indigenous populations.

L'Oréal's [Responsible Advertising & Marketing Communications Policy](#) champions diversity, equity, and inclusion by embedding it in our advertising and marketing communications and ensuring that these portray individuals respectfully, avoid harmful stereotypes, and raise awareness of the full diversity of beauty.

## **No Harassment, Bullying, and Violence**

In 2019, L'Oréal put together a coalition of companies to publicly support the adoption of the [ILO Violence and Harassment Convention](#) (n°190). L'Oréal is committed to uphold its principles.

L'Oréal prohibits any forms of harassment (sexual harassment and bullying), gaslighting, hostility, sexist behaviour, and any form of threats intended to cause physical, psychological, sexual, or economic harm, whether it is within our own operations and with our suppliers, in a work-related context. This encompasses all forms of violence and harassment, including sexual harassment, directed at individuals or groups based on their sex or gender.

## **Freedom Of Association and Collective Bargaining**

L'Oréal respects and promotes the right of employees and workers to freely associate and form trade unions, as well as their fundamental effective right to collective bargaining. We do not tolerate any discrimination or adverse actions against workers' representatives for participating in lawful trade union activities. We also prohibit any discrimination or adverse actions against those participating in or refraining from participating in such activities.

In situations or locations where independent trade unions are discouraged or restricted, employees and workers shall be allowed to gather independently to discuss workplace-related problems in a collective manner.

## **Freedom Of Expression, Thought, Religion and Belief**

L'Oréal upholds the fundamental rights to freedom of expression, thought, religion and belief. For our employees, L'Oréal is committed to creating a workplace where everyone feels safe and empowered to express their opinions and beliefs, without fear of discrimination or retaliation, within the boundaries of applicable law and in alignment with the Group's values.

## **Right To Privacy**

At L'Oréal, we are committed to upholding the right to privacy and the protection of personal information is at the core of L'Oréal's values and commitments. L'Oréal focuses on four core principles of transparency, legitimacy, proportionality and security, to contribute to a relationship of trust with its stakeholders. Personal information is collected and processed fairly and lawfully, stored for specific and legitimate purposes, in an adequate and not excessive way and underpinned by the security of that information.

## **Safety, Physical and Mental Health**

The health, safety and wellbeing of each individual is a fundamental Human Right. Within our own operations we are committed to ensuring the health and safety of all workers and strive to eliminate occupational risks. To achieve this, we provide and maintain a safe and healthy work environment by adhering to the highest international health and safety standards. L'Oréal takes a proactive approach to managing health and safety, guided by the principles of precaution, prevention, protection, and risk management. Suppliers are expected to provide their employees and contracted workers working on their premises with a clean, safe and healthy workplace.

L'Oréal also recognizes and actively promotes the right to mental well-being. L'Oréal actively works to end the stigma and discrimination surrounding mental health including through awareness-raising initiatives and training.

## **Right to Security**

To ensure the security of each individual, in situations where the involvement of government security forces or private security companies is unavoidable and necessary, we will exercise oversight to ensure their actions are proportionate, respect Human Rights, and avoid the risk of excessive use of force on our stakeholders. This commitment is reinforced through contractual clauses with suppliers, mandating adherence to the [Voluntary Principles on Security and Human Rights](#) in all their operations.

## **Right to an Adequate Standard of Living and Decent Working Conditions**

L'Oréal recognizes that workers have the right to an adequate standard of living.

For our employees, we ensure that they are paid a living wage covering their basic needs and calculated in line with best practices. L'Oréal's Share & Care programme provides a global framework for a vast range of employee benefits spanning health, financial support, wellbeing in the workplace, with provisions that often surpass the local requirements. Furthermore, L'Oréal is dedicated to advancing living wages and social protection beyond its own operations.

For our employees and our suppliers' employees whose working time is subject to monitoring, the normal work week is limited to 48 hours (fewer if provided by national law, collective agreement or industry standards). Overtime is compensated at a premium rate and does not exceed the level set by local law and in any case 12 hours per week or 36 hours per month. Overtime cannot be compelled through threat of pay deduction or other sanctions. They are allowed at least 24 consecutive hours of rest in every seven-day period or 48 consecutive hours of rest in every fourteen day period (or more if provided by national law or industry standards).

## **Right To a Clean, Healthy and Sustainable Environment**

L'Oréal recognizes the fundamental right of all people to a clean, healthy, and sustainable environment and acknowledges the negative impacts climate change can have on Human Rights. In line with our sustainability commitments, including our Forest and Land Use Policy, we aim at reducing our environmental footprint and carbon emissions; mitigate risks through adaptation and mitigation plans to avoid and reduce biodiversity loss and developing our conservation program to improve the health of priority ecosystems and working towards a Just Transition by embedding Human Rights into our efforts to address environmental challenges.

## **Land Rights and Indigenous Peoples**

L'Oréal recognizes and respects the rights of individuals and communities to property and land tenure, and we reject any form of land grabbing, forced eviction and displacement.

We are particularly committed to upholding the rights of Indigenous Peoples, recognizing their unique cultural traditions, lifestyles, institutions, and deep-rooted connections to their ancestral lands. In line with international standards, including the ILO Indigenous and Tribal Peoples

Convention (No. 169) and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), L'Oréal aims at ensuring the Free, Prior and Informed Consent (FPIC) of Indigenous peoples' and local communities prior to any activity that may affect these rights, and promotes adequate compensation, accommodation or remediation through mutually agreed procedures where production or conservation uses infringe on these lands, territories or resources.

### **Respect for Human Rights Defenders**

We do not inhibit the lawful actions of Human Rights defenders or restrict their freedom of expression, freedom of association, or right to peaceful assembly, including those who actively campaign on issues that may be linked to our business.

### **Implementation**

The effective implementation of this Human Rights Policy is a priority for L'Oréal. We regularly track the effectiveness of our Human Rights efforts and report on our risks and progress.

### **Governance**

L'Oréal's commitment to respect Human Rights is supported at the highest level of the Company by our Chief Executive Officer, with Human Rights being regularly discussed at Executive Committee and Board level.

Human rights matters are the responsibility of the Chief Corporate Responsibility Officer, who reports directly to the Chief Executive Officer. Depending on the issues addressed, other teams, such as human relations and operations including purchasing and R&I may also be involved.

A network of more than 50 human rights correspondents plays a key role in embedding this culture in every Group entity. In addition, various bodies, including a Human Rights Committee for the supply chain, chaired jointly by the Chief Corporate Responsibility Officer and the Chief Operations Officer, discusses the implementation of the Human Rights Policy and informs decision-making;

### **Training and Raising Awareness**

We provide training and updated guidance to all employees on Human Rights, including a mandatory e-learning program on Ethics and Human Rights. This commitment to training and awareness-building extends to our suppliers and business partners.

New buyers receive compulsory training on Responsible Purchasing to learn about how to ensure respect of the Group's Ethical Principles. L'Oréal deploys its capacity building strategy for its suppliers to support business transformation towards sustainability. This includes tools, guidance, training programs and webinars for suppliers and buyers.

### **Human Rights Due Diligence (HRDD)**

Our Human Rights Due Diligence (HRDD) approach, aligned with the UNGPs, is designed on a risk-based approach to identify, assess, and mitigate potential Human Rights risks throughout our operations and value chain.

The Group carries out, where appropriate, heightened Human Rights due diligence in conflict-affected areas. Where necessary, we will pursue a responsible exit, in alignment with international norms.

The operationalization of the HRDD is further detailed in our [Human Rights Report](#).

### **Monitoring in our own Operations**

An annual ethics and Human Rights reporting system enables monitoring of the implementation of Human Rights in the Subsidiaries, namely with regard to Human Rights.

Social audits and employee surveys are used to check that these commitments are implemented by the Subsidiaries.

### **Monitoring Along Our Value Chain**

We evaluate and select business partners who share our ethical standards, namely with regards to Human Rights. Suppliers are required to commit by signing our Mutual Ethical Commitment Letter (MECL), encompassing Human Rights. By signing the MECL, suppliers agree to respect our standards and to take part in our social audit program.

With regards to our upstream value chain, we have been engaging with our suppliers for many years on various topics including Human Rights as part of our sustainable sourcing strategy. On a risk-based approach, L'Oréal works proactively to identify the root causes and resolve issues, using its leverage with the suppliers involved. Our preferred approach is to engage with suppliers prior to a potential adverse impact.

### **Grievance Mechanisms and Remediation**

L'Oréal is committed to providing effective grievance mechanisms for individuals and communities to raise Human Rights concerns. Our grievance processes are designed to be legitimate, accessible, predictable, equitable, transparent, and allows for anonymity.

Through “Speak Up”, L'Oréal's whistleblowing mechanism, our internal and external stakeholders, including workers in our value chain have access to a secure website they can use to raise any concerns they may have, including serious infringements of Human Rights. Speak Up reports are handled with by the Global Ethics Department with the support of a network of trained Ethics Correspondents, in a secure, effective manner that provides all the guarantees of confidentiality. When Speak Up reports are admissible, we conduct prompt and thorough investigations into all reported grievances and maintain a zero-tolerance policy for retaliation against anyone for raising a concern or participating in an investigation, as outlined in our Speak Up Reports Management Policy. Additionally, L'Oréal also expects its suppliers to implement effective grievance mechanisms and namely through sectorial coalitions and multistakeholder initiatives.

Remediation for any adverse Human Rights impacts identified through our grievance processes or due diligence is timely, transparent, and accountable. This includes clear stages of engagement, a commitment to timely resolution, and a range of remediation options as appropriate. L'Oréal regularly monitors, evaluates, and strives to improve its grievance mechanisms and remediation processes to ensure their effectiveness in addressing Human Rights concerns.

### **Reporting**

L'Oréal annually publishes data in its URD (Universal Registration Document) detailing the number of reports received through its Speak Up program, their nature and the subsequent actions taken to address them.

Additionally, L'Oréal publishes a dedicated Human Rights Report.

### **Driving systemic change beyond L'Oréal**

Recognizing that Human Rights issues cannot be addressed in isolation, we actively participate in and contribute to local, national, and international multi-stakeholder initiatives, action-driven coalitions, networks, and working groups dedicated to advancing and driving capacity on Human Rights. We believe that collaboration and collective action are crucial to increasing our impact and driving systemic change.

### **Further Information and Available Resources**

- List and links to some of our policies and internal documents

- Code of Ethics ([Link](#))
  - Employee Human Rights Policy ([link](#))
  - L'Oréal For The Future (Link)
  - Sustainable Sourcing Policy ([Link](#))
  - Forest Policy (Link)
  - Mutual Ethical Commitment Letter ([Link](#))
  - L'Oréal Speak Up Policy ([Link](#))
  - Responsible Advertising and Marketing Communications Policy ([Link](#))
  - Data Privacy Group Policy ([Link](#))
  - Responsible Lobbying Policy ([Link](#))
- If you wish to bring up any Human Rights related issue, please use the L'Oréal Speak Up channels, in line with our Speak Up Policy which describes how reports are handled by the Group.
  - L'Oréal is keen to receive feedback from internal and external stakeholders. If you wish to share feedback or would like to discuss this policy, please reach out to [human.rights@loreal.com](mailto:human.rights@loreal.com)

*L'Oréal commits to its best efforts in supporting its L'Oréal for the Future ambitions under this policy. However, achievement of these ambitions may depend on external factors over which L'Oréal may have limited control. In these situations, whenever possible, L'Oréal will use its leverage to achieve more suitable outcomes.*