



# Coty's Human Rights Vision & Policy Commitment

**COTY**  
SINCE 1904



## **Coty's Human Rights Vision & Policy Commitment**

Coty has the responsibility to respect and protect human rights. We believe there is a both a business and moral responsibility to do so, and to ensure human rights are upheld across our operations and value chain.

At Coty, we are committed to respecting all internationally recognized human rights standards. Our policy encompasses the rights set out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

As signatory to the United Nations Global Compact, we have made a public commitment to respect and support human rights. Our commitment is guided by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

When national law and international human rights standards differ, Coty seeks to follow the higher standard; when they are in conflict, Coty will adhere to national law, while seeking ways to respect international human rights standards as much as possible.

This policy applies to Coty business entities, associates and business partners.

### **Coty's Vision and Expectations for our People and Business Partners**

Coty's products are made with ingredients sourced from all over the world, so we recognize that our impact extends far beyond our own operations. Coty's Human Rights Policy aims to create, protect and grow respect for human rights principles across its associates, supply chain and with all stakeholders.

Coty's greatest strength is our people. Everyone deserves to be treated with dignity and respect. As set out in our associate [Code of Conduct](#), we are committed to ensuring that our employees work in a safe environment based on respect for all. Our Code of Conduct sets out our expectations for our associates. We expect all associates to follow it and to respect and support human rights.

We have a comprehensive Responsible Sourcing Framework and [Code of Conduct for Business Partners](#) (CoC) which sets out our expectations with our suppliers regarding human rights, including risk assessments and regular audits. Compliance with the CoC or agreed equivalent is a requirement of working with us and partners are expected to take all reasonable steps to ensure compliance.

### **How Coty Addresses and Reports on Human Rights Risks**

Coty understands that we must actively identify and address any actual or potential human rights violations which occur in our operations, or within the operations of third-party suppliers. We are committed to applying human rights due diligence and consider it an ongoing process, recognizing that it requires particular attention at certain stages in our business activities, such as when we form new partnerships, or our operating conditions change.

We therefore integrate due diligence into our policies and internal systems, acting on the findings, tracking our actions, and communicating with all of our stakeholders about how we address potential violations.

We use several tools to assess supplier human rights performance. Supplier sites are subject to a comprehensive risk assessment. Low and medium risk sites are required to provide evidence of their sustainability performance using either the SEDEX self-assessment questionnaire, or the EcoVadis 360° ESG assessment. For high-risk sites, suppliers are subject to an independent third-party site audit.

In certain countries where Coty or our business partners operate and for certain ingredients we source, we face specific human rights risk exposure. We acknowledge that this implies that Coty must put in place additional due diligence to evaluate these risks, and when appropriate address them immediately. As such, we are a member of multi-stakeholder industry initiatives related to respecting and advancing human rights in a non-competitive manner. For example, Coty is a founding member of the Responsible Mica Initiative (RMI). We seek to source our mica through RMI member companies and participate in the annual RMI data collection campaign, sharing details of our mica sourcing.

We report on our human rights impacts annually through our Sustainability Report. In addition, in our Supply Chain Transparency and Modern Slavery Statement, we annually reaffirm our dedication and approach to ensuring that the supply chains we employ in the sourcing and manufacturing of products do not include, utilize or tolerate human trafficking, slavery and forced or child labor.

### **Grievance Mechanisms**

We encourage employees and third parties to use the Ethics and Compliance Hotline to raise questions or concerns. The hotline is available through multiple channels and many languages. Reporting can be made anonymously, and each report is investigated.

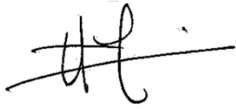
With our business partners, when a risk is identified through poor SEDEX or EcoVadis performance, they are supported to improve their practices through corrective action plans which set clear timelines for expected improvement. Where we see no meaningful improvement or in the event of serious breach or repeat minor breaches, Coty has a grievance policy in place which can result in moving business away from that partner over 12-18 months.

### **Governance**

Our policy work in this area is overseen by the Coty's Chief Executive Officer, supported by Coty's Executive Committee and Senior Leadership Team, especially the Chief Procurement Officer, Chief Scientific & Sustainability Officer, Chief Human Resources Officer, Chief Corporate Affairs Officer and the Chief Legal Officer. This ensures that every part of Coty's business is committed to respecting human rights principles. Our Board provides oversight including through its committees and by our Board member for ESG.

This Human Rights Policy consolidates our existing commitments and brings increased clarity on our processes and procedures. This policy is reviewed annually and communicated widely.

We are thrilled that it will be available to the public via our website and we will post it internally through our various channels in order to raise awareness for these principles.

A handwritten signature in black ink, appearing to be 'Sue Y. Nabi', written over a horizontal line.

Sue Y. Nabi  
Coty Chief Executive Officer

*May 2022*