

## **The KOSÉ Group Modern Slavery Statement**

KOSÉ Corporation and KOSÉ Group companies (hereinafter collectively referred to as the "KOSÉ Group" or the "Group") disclose the following information on our initiatives in our business activities and supply chains in fiscal 2022 (from January 1 to December 31, 2022) to prevent slavery and/or labour under conditions of slavery and human trafficking based on the provisions of Section 54 of the UK Modern Slavery Act 2015.

### **Introduction**

The KOSÉ Group respects the human rights of all people involved in all our business activities and supply chains. In addition, with a strong recognition that there should be no negative impacts on human rights, we continue to conduct activities to ensure that no form of slavery or human trafficking is practiced in our business or supply chains.

### **Organisation's Structure**

KOSÉ Corporation, the ultimate parent company of the KOSÉ Group, is a global cosmetics company founded in Japan in 1946 with the Corporate Philosophy "Create a culture and values embodying a distinctive beauty through a sophisticated fusion of sensuousness and intelligence" and the Corporate Message "Creating Beauty in a Sustainable World". The KOSÉ Group, consisting of KOSÉ Corporation and its 38 consolidated subsidiaries with over 13,000 employees worldwide, is engaged mainly in the manufacture and marketing of cosmetics. The Group's products, including those in e-commerce operations, are currently sold in 68 countries or regions, with consolidated sales of 289.1 billion yen in fiscal 2022.

Our UK branches, KOSÉ Corporation UK branch and ALBION Co., Ltd. London branch, import, market and distribute the Group's products in the United Kingdom. In the United Kingdom, Tarte, Inc. also distributes its products.

For more information about the Group, please visit: <https://www.kose.co.jp/company/en/>

## Our Supply Chains

The KOSÉ Group procures raw materials from suppliers in various regions such as Asia, including Japan, Europe, and the United States, and conducts manufacturing at its own factories in Japan and Taiwan. We also outsource the manufacture of some of our cosmetic products and purchase finished products from our suppliers.

To provide better products and services at every stage of procurement, manufacture, distribution, and marketing, and to promote sustainable procurement initiatives, it is essential to strengthen cooperation with a wide range of suppliers both inside and outside Japan, and this is one of the most important issues for us.

For more information about our supply chain management, please visit:  
<https://www.kose.co.jp/company/en/sustainability/scm/>

## Our Policies

Since 2017, the KOSÉ Group has been a signatory to the United Nations Global Compact, the world's largest sustainability initiative for businesses and organizations. The key principles of this Compact include support for human rights and the elimination of all forms of forced and compulsory labor and child labor, and we are acting to fulfill this responsibility.

We have formulated our own [KOSÉ Group Action Guidelines](#), which state that we will act with integrity in accordance with “Mind to Follow the Right Path”, which was the motto of Kozaburo Kobayashi, the founder of KOSÉ Corporation, while respecting the human rights of all people involved with the Group, including our employees, suppliers and other business partners, and customers.

To further promote the human rights initiatives of [the KOSÉ Group Action Guidelines](#), we have formulated [the KOSÉ Group Human Rights Policy](#) in line with the United Nations Guiding Principles on Business and Human Rights, as well as complying with

the principles set out in the International Bill of Human Rights and other international standards, and we work to ensure that there are no human rights abuses, including slavery and human trafficking, at any stage of our business operations or supply chains. In addition, in [the KOSÉ Sustainability Plan](#), which defines our approach to sustainability, we have identified the promotion of respect for human rights as one of the principles on which the KOSÉ Group should base itself and we are determined to promote effective initiatives.

As for actions toward our Group employees and society, in addition to having employees sign a pledge that requires compliance with [the KOSÉ Group Action Guidelines](#), we conduct educational and awareness-raising activities through annual compliance education. At the supply chain stage, we have formulated [the Sustainable Procurement Guidelines for Suppliers](#) as a supplement to the procurement policy of the Group, and we have provided our suppliers with full explanations and ascertained their actual situations in order to ensure their full comprehension of our commitment to respect for human rights. In addition to these initiatives, we have obtained declarations from our suppliers that they will fulfil their corporate social responsibilities (CSR).

## Human Rights Due Diligence

The KOSÉ Group is promoting human rights due diligence based on the laws and regulations of each country in which it operates, in accordance with the procedures of the United Nations Guiding Principles on Business and Human Rights (UNGPs).

This is an ongoing process involving communication with our external stakeholders in relation to the following aspects, based on the Group's Human Rights Policy: (i) Assessment of possible negative impacts and identification of issues to be addressed; (ii) Implementation of appropriate measures; (iii) Monitoring and follow-up evaluations; and (iv) Information disclosure.

In addition, the KOSÉ Group has established dedicated internal and external help desks (hotlines) in order to mitigate any negative human rights impacts should they occur. These hotlines guarantee confidentiality and anonymity to ensure that



whistleblowers are not placed at any disadvantage. In the event of any negative human rights impacts, we will promptly take steps to provide relief to those affected.

In fiscal 2022, there were no issues reported to the above hotlines that were serious enough to constitute a human rights abuse, such as participation in modern slavery or human trafficking.

The progress of these human rights due diligence processes is reported twice a year to the Sustainability Committee, which is supervised by the Board of Directors and

chaired by the President & CEO, and resolutions on future promotion are made. In

addition, we have a monitoring system in place, consisting of a working group to promote initiatives to respect human rights, established within the Sustainability Promotion Committee under the Sustainability Committee, in order to prevent human rights abuses, including modern slavery and human trafficking, at all stages of our business and supply chains. It is led by the division specializing in sustainability, human resources and purchasing departments, with the cooperation of the legal department, which manages the reporting hotlines.

## **Risk Assessment and Management**

Of the four processes of the KOSÉ Group's human rights due diligence, to determine (i) Possible negative impacts and issues to be addressed, and (iii) Monitoring and follow-up evaluations, we have conducted a Human Rights Risk Assessment (assessment of potential risks to human rights arising from business activities).

This is an internal assessment of actual and potential human rights risks in the business value chain based on the Human Rights Guidance Tool developed by the United Nations Environment Programme Finance Initiative (UNEP FI), and a desktop study on human rights risks in each country where the Group operates. In addition to the above and taking into consideration social perspectives acquired through engagement with rights-holders, we have assessed particularly important human rights issues based on the likelihood of potential and actual negative human rights impacts

within and outside of Japan, as well as the status of preventive and corrective measures implemented by the Group in response to those impacts.

As a result of these risk assessments, we have determined that it is necessary to keep promoting “ongoing understanding of human rights issues in the raw material procurement supply chains” as well as “diversity and inclusion in the company and human rights (especially human rights of foreign employees and gender diversity) in the workplace” as the human rights issues that we should address. Furthermore, it was confirmed that, in order for the Group to have a positive impact on society through its respect for human rights, it is also important to promote “diversity-friendly communication of information and responses (public relations, advertising, customer service, product explanations, etc.)”.

With regard to the above, the human rights risk identification process and efforts, and, in particular, the objective validity of the issues to be addressed by the Group, have been assessed by a third-party organization specialized in human rights risk assessment.

## Performance Assessment

### — Business activities

The KOSÉ Group conducted a qualitative survey of all of its business facilities (47 facilities/departments, response rate: 100%) by using a human rights self-check sheet, to understand the human rights risks and countermeasures which vary according to the characteristics of each facility and business. We also hear from our own production factories with relatively large numbers of foreign employees, about the numbers and nationalities of their foreign employees and measures taken to ensure that foreign employees are not disadvantaged. Combining this information, it was confirmed that there were no serious human rights abuses, including slavery and human trafficking, in our business activities in fiscal 2022.

## — Supply chains

KOSÉ Corporation undertakes to verify the status of its suppliers. For example, we ask our primary suppliers with a transaction value of a certain amount or more to complete a Self-Assessment Questionnaire (hereinafter referred to as SAQ) using the CSR Procurement Self-Assessment Questionnaire of the United Nations Global Compact Network Japan (GCNJ) every year. Scores of 70% or above are categorized as Level 3, the highest of all the three scoring levels; scores of 50% or above but lower than 70% are Level 2; and scores of lower than 50% are Level 1. For suppliers with low scores, their SAQ response results are reviewed in detail by both sides, and requests for improvements are made as necessary. In particular, for suppliers with low scores in human rights and labor issues and environmental impacts, we provide advice on setting targets to be achieved through meetings during onsite inspections and other occasions, and ask for reports on the results of the actions they have taken.

In fiscal 2022, as in the previous year, we conducted an SAQ survey of 157 suppliers regarding overall ESG issues, including human rights and labor. Following close examination of the responses regarding human rights and labor issues that we received from the 42 companies of Levels 1 and 2 (representing 26.7% of all the companies surveyed), we conducted on-site interviews, face-to-face and web interviews, as well as e-mail confirmations with 28 companies (representing 66.7% of all the companies of Levels 1 and 2), according to their scoring status.

In fiscal 2022, we visited oil palm plantations in Malaysia and had discussions with the Malaysian government, palm oil production companies, and growers (small-scale farmers). Through these activities we have ascertained that, as of the end of December 2022, there are no particular CSR procurement risks, including slavery and human trafficking, with any of our primary suppliers.

The KOSÉ Sustainability Plan sets a target to achieve "100% responsible palm oil procurement" by 2030, and our actual procurement performance of KOSÉ Corporation



and Albion Inc. in fiscal 2022 was 20.7%, including procurement of certified raw materials and purchase of RSPO credits under the Book and Claim system.

In addition, we have joined Sedex (Supplier Ethical Data Exchange; <https://www.sedex.com/> ) to keep track of the status of our business activities and supply chains. While utilizing their various resources, we will continue to address human rights and other issues to build sustainable and responsible supply chains and our own business activities.

## Training

Based on the KOSÉ Group Human Rights Policy, the Group implements various training programs for employees to promote the idea of respecting human rights, including prohibition of modern slavery and human trafficking, in our business and supply chains.

### Examples in fiscal 2022

<ul style="list-style-type: none"> <li>• E-learning to ensure understanding of the “KOSÉ Group Action Guidelines” and the “KOSÉ Group Human Rights Policy” (Attendance rate: 100%)</li> </ul>
<ul style="list-style-type: none"> <li>• Training program for managers to understand the “Guiding Principles on Business and Human Rights”, and to share the company's human rights risk issues (Attendance rate: 100%)</li> </ul>
<ul style="list-style-type: none"> <li>• Other training programs for managers and others in Japan, based on position level, such as programs to promote the understanding of gender diversity including LGBTQ+, and Unconscious Bias training to ensure that management takes into account the diversity of subordinates.</li> </ul>

## Further steps

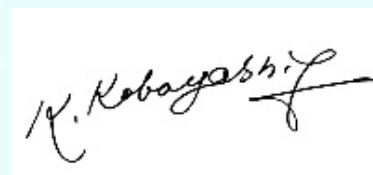
Based on the [KOSÉ Group Human Rights Policy](#), the KOSÉ Group will continue its efforts to ensure that the human rights of all people in our business and supply chains are free from negative impacts, including slavery and human trafficking.

For more information about our initiatives in relation to Human Rights, please visit:

<https://www.kose.co.jp/company/en/sustainability/rights/>

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This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 31, 2022. It was approved by the Board of Directors on July 3, 2023. An addition regarding Tarte was made to the organization's structure section of the statement released on 7/3.

A handwritten signature in black ink, reading "K. Kobayashi", on a light pink rectangular background.

**Kazutoshi Kobayashi**

President & CEO

KOSÉ Corporation and the KOSÉ group

July 3, 2023

Added date : September 19, 2023