# Rituals Cosmetics UK Limited

Modern Slavery Statement for the year ended 31 December 2024 This statement is made pursuant to Section 54 of the Modern Slavery Act 2015.

# The UK Modern Slavery Act:

Rituals' management has agreed to abide by moral and ethical values in managing the company. The Board of Directors acknowledges its responsibility in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015.

We expect our third-party suppliers to respect and adhere to the same philosophy in the management of their own companies. We only work with suppliers (including their factories, subcontractors, and their own suppliers) that agree to comply with our requirements and principles. The principles governing Rituals' actions and business conduct are in line and compliant with:

- The universal declaration of Human Rights
- The Conventions of the International Labour Organisation
- The guidelines of the OECD, regarding anti-corruption
- The principles of the United Nations Global Compact

## Organisation structure and supply chains

#### The Brand

Rituals Cosmetics Enterprise B.V. is a Certified B Corp Company, dedicated to sustainable and personal wellbeing in the beauty luxury industry. With its products in body care, home fragrances, beauty and gifts, Rituals embraces the philosophy of transforming everyday routines into more meaningful moments. Each product is inspired by an ancient tradition allowing you to find happiness in the smallest of things. Founded in 2000 in Amsterdam, The Netherlands, Rituals was the first luxury brand to combine home and body products. By now, Rituals has developed into a global industry expert in multiple countries, present in vibrant cities such as London, Paris and Shanghai. Each line of business has a strong market presence, and all together, Rituals operates in more than 100 countries.

#### Governance

Rituals Cosmetics Enterprise B.V. is the parent company of 27 subsidiary entities that carry out its operations across several countries, primarily in Europe. The Group is centrally managed from its head office located in Amsterdam, and each region where it operates its own stores has a designated country director who reports to the head office. The Group has established local Works Councils to communicate and engage with the employees in accordance with the local laws.

Rituals does not own or operate any manufacturing sites, whether packaging production sites or product production sites. Rituals has no operational control of any production site.

## Policies in relation to slavery and human trafficking

Our main governing policies, processes and procedures for dealing with ethical business conduct and human rights specifically are: The code of conduct, supplier code of conduct, responsible sourcing policy, human rights policy, our enterprise risk management process and due diligence process.

## Training on modern slavery and trafficking

A human rights training is part of our Fundamentals compliance training, a mandatory training for all our employees.

#### **Risk assessment and management**

#### Salient issues

In 2024, we conducted a human rights risk assessment to identify and prioritize our most salient issues. Salient issues are the areas we have identified as those human rights at risk of the most severe negative impact on people through our activities or business relationships. Since human rights risks

can be linked to specific products, commodities, industries or countries, we mapped our value chain to ensure that all relevant aspects were carefully considered throughout the process. Based on our geographical and operational footprint, a scan of different sources including a peer analysis, desktop research and internal stakeholder engagement, a long list of human rights risks was created. To ensure we prioritized the most significant human rights impacts, we assessed the severity (the scale, scope and irremediability) and likelihood of the impacts throughout our value chain

To safeguard and promote human rights along the value chain and minimize human rights risks, we have a set of preventive measures concerning our own business area and our direct suppliers. We continuously review and improve those preventive measures in light of our ongoing risk management process.

The list of salient issues is informed by the human rights risk analysis conducted. Our salient 9 issues are:

- Equality and non-discrimination
- Clean and healthy environment
- Occupational health and safety
- Right to an adequate standard of living
- Livelihood and access to resources
- Freedom of association and collective bargaining
- Fair and just working conditions
- Child labor
- Forced labor, modern slavery and human trafficking

Rituals has not had any indications of non-compliance related to violation of human rights, and no complaints have been received through any of our complaint channels, notices, or communications during fiscal year 2024.

#### **Preventive measures**

We have a set of preventive measures concerning our own business area and our direct suppliers to safeguard and promote human rights along the value chain and minimize human rights risks. We continuously review and improve those preventive measures in light of our ongoing risk management process. Key preventive measures include:

- Onboarding our suppliers on SedEx to monitor and assess our suppliers' compliance with Human Rights Standards and identify areas of improvement;
- Third-party auditors to conduct SMETA, compliance audits, or virtual assessments at high-risk suppliers;
- Supplier Business Reviews to discuss audit findings (SedEx) and EcoVadis results and support them with corrective actions to manage issues and improve performance

## Key performance indicators to measure effectiveness of steps being taken

#### **EcoVadis:**

We use EcoVadis as a supplier assessment platform to analyze significant suppliers' sustainability and corporate responsibility practice and to encourage an ongoing supplier relationship based on continuous improvements. The EcoVadis assessment is one of the most renowned evaluation tools, which entails an extensive survey on the suppliers' practices on environment, labor & human rights,

procurement. ethics, and sustainability. We require our suppliers to complete the EcoVadis assessment. We expect all our onboarded suppliers to obtain at least a score of good (total score between 45-64 points). For our key strategic suppliers, we set the goal of reaching advanced (total score between 65-84 points) in their EcoVadis assessment. Additionally, as part of our commitment, we now require all our suppliers to reach a minimum score of 45 points per EcoVadis pillar. Our suppliers perform well overall. Still, we believe it is important to include the required minimum score per pillar in the target. This helps us to raise the bar and aim for continuous improvement. As a result of this recent update, we now have 45% of our suppliers meeting their target of the total required score and the minimum score per pillar.

#### SEDEX:

We use SEDEX to identify and manage ESG (Environment, Social and Governance) risks in the supply chain. By 2025, we aim for 100% of our Tier 1 direct suppliers to complete SEDEX onboarding through the self-assessment questionnaire (SAQ). We currently have 69% of our direct suppliers onboarded. The self-assessment questionnaire is a first step in identifying potential risks. Additionally, onsite audits are performed through SEDEX to strengthen our risk assessment.

In 2024, we have conducted 54 audits across our direct supplier base, comprising a mix of announced, non-announced and semi-announced audits. We discuss the audit findings with suppliers and support them with corrective actions to manage issues and work on continuous improvement. Follow-up actions and improvements should usually be completed within six months, or sooner if the severity of the impact requires it.

#### Looking ahead

As we move forward, we remain committed to strengthening the integration of human rights due diligence across our value chain. We will continue the onboarding and monitoring of our suppliers through SEDEX, EcoVadis and our supplier business reviews and are also in the process of onboarding our warehouses and logistics partners. We are planning to update our human rights risk assessment to reflect the changing landscape and our growing business. Furthermore, engaging with internal and external stakeholders and improving traceability of our raw materials will be a key area of focus. In this, we focus our efforts on areas where the potential impacts are most severe and/or most likely to occur.

Date of approval:

Signed: Raymond Upostuman

Name: Mr. R.B.H.M. Cloosterman Job Title: CEO