

APPENDIX TO THE DIRECTORS'
REPORT

TO THE GENERAL SHAREHOLDERS'
MEETING



GROUPE ROCHER
reconnect people to nature



LABORATOIRES DE BIOLOGIE VEGETALE YVES ROCHER

Public limited company with capital of €4,377,767.85

Registered office: La Croix des Archers - 56200 La Gacilly, France

Registered on the Vannes Trade and Companies Register under number 876 580 077 ---

To whom it may concern,

Pursuant to of French Law No. 2017-399 of March 27, 2017 concerning the duty of vigilance required of parent companies and companies commanding groups, please find below the vigilance plan for Laboratoires de Biologie Végétale Yves Rocher and its subsidiaries (hereafter “Groupe Rocher”).



Taking action to meet our Sustainable Development goals

In an increasingly built-up world surrounded by technology, giving back to nature the place it deserves in our society is undoubtedly one of the biggest challenges of our time.

True to its values and in keeping with the process set in motion by my grandfather, Groupe Rocher decided to adopt the B Corp status.

The goal is no longer to become the world's best company but the best company for the world by combining financial performance and consideration of the common good.

This is the approach that we have been applying since the Yves Rocher brand was created in 1959 and that is now enshrined in the raison d'être of Groupe Rocher: reconnect people to nature.

It is for this reason that we are committed to the initiative taken by the Macron government through the Pacte law.

We have entered the era of missionary brands. Companies must be led on the basis of a three-pronged approach that is financial, societal and environmental in nature. This means that they have to be seen as useful by the public.

We can only encourage this movement.

Bris Rocher

Chief Executive Officer of Groupe Rocher

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INTRODUCTION

Groupe Rocher pursues a constant process of improvement of its economic, social and environmental impact. Over and above its CSR¹ initiatives recorded in the Appendix to the Directors' Report, "Declaration of Extra-financial Performance", Groupe Rocher has given priority to the effective implementation of its Vigilance Plan. This plan, details of which are specified throughout this report, has been created according to French Law No. 2017-399 of March 27, 2017 concerning the duty of vigilance required of parent companies and companies commanding groups (hereafter "Duty of vigilance law"). It provides Groupe Rocher with an additional opportunity for the formalization and global coordination of initiatives already launched in conjunction with its various sites, subsidiaries, suppliers and subcontractors.

This document outlines the specific measures taken by Groupe Rocher in order to put in place the Vigilance Plan in 2019, together with the results this has given. It indicates to what extent it has been possible to identify and control risks linked to the activities of the Group's suppliers which could infringe human rights and the fundamental freedoms, health and safety of people, and the environment.

It should be explained beforehand that in the present document the term "Supplier" refers to top-level suppliers and subcontractors with which Groupe Rocher has a long-standing commercial relationship.

¹ CSR: Corporate Social Responsibility



RISK MANAGEMENT WITHIN GROUPE ROCHER

Keen to develop a culture of trust and integrity at every level of the company activity and with all of its partners, Groupe Rocher formalized in 2013 its commitments to business ethics through its “Code of Business Conduct”. Built around 12 principles, this Code establishes the frame of reference within which the Group and its employees are to go about their business on a day-to-day basis.

An ethical contact point contactable through a single email address (ethics@yrnet.com) is available to all Groupe Rocher employees so that they can report any irregularity or infringement (whether proven or suspected) of the principles quoted in the Code of Conduct.

Every year, the Group’s major risks are mapped out by the Risk Management Department in conjunction with the Group's various departments/subsidiaries. All types of risk are analyzed during this process: financial, operational, human, IT, harm to the environment, compliance with laws and regulations, health and safety, etc.

To round off its approach to risks and to respond to the challenges of the Sapin 2 law, the Group started to map corruption risks in 2017. This map will be updated at the beginning of 2020. The subsidiaries, such as Flormar, Sabon and Arbonne, will be incorporated into this risk analysis.

Finally, a specific process has also been developed to assess the corruption risks of the Group's agents and distributors.

In addition to the above, a specific analysis of the risks linked to the duty of vigilance was conducted in 2018. Regarding precautionary measures and preventive action implemented by Groupe Rocher, it was concluded that such risks primarily depend on risk management by our suppliers/subcontractors. Although the risks are low, in 2019 the Group extended this analysis to all of the Group's industrial and logistical sites.

Finally, it should be recalled that the Group has also deployed over several years a solid internal monitoring system that applies to all of the Group’s entities/subsidiaries. There is a corpus of internal control procedures (12 in total) available on the Group's Intranet site which enables all employees to familiarize themselves with the fundamental operating rules that govern a number of cross-disciplinary processes (purchasing, human resources, cash flow, etc.). The system is complemented by internal control audits, risk prevention audits and/or external audits.

RISK MANAGEMENT OF GROUPE ROCHER SUPPLIERS' OPERATIONS

Groupe Rocher policy: Basic principles and deployment strategy

Governance

Understanding the duty of vigilance and, more generally, the whole purpose of sustainable purchases forms an integral part of the strategy put in place by the Group's Operations Department. For this reason, it is supported by Senior Management with the implementation of ethical and sustainable practices in relation to the Group's Suppliers and supply chains.

Furthermore, conscious of the need to arbitrate at a sufficiently high level of responsibility in relation to such issues, the Group decided to establish a specific body ~~consisting~~ of business line specialists (CSR, Purchasing, Risk Management, etc.) and Group decision-makers. Its role is not only to arbitrate where required but also to ensure that this subject is given adequate exposure and global governance (see Appendix 1).

This "**Governance Committee**" therefore meets:

- on a regular basis, to monitor the performance of the various Suppliers;
- on an exceptional basis, to follow up on a field audit that has brought to light practices that are incompatible with Groupe Rocher requirements.

Method

Risk mapping

The Group decided to incorporate all categories of purchases into its risk map. The Group's different categories of purchases are therefore included: production, subcontracting and external production.

Three risk criteria were selected ~~retained~~: **Activity Risk**, **Country Risk** and **Turnover Risk**.

A scoring system, which is used to assess potential social as well as environmental risks, is attached to each risk criterion.

Each Supplier is assessed on the basis of these three criteria and is given a "Supplier Vigilance" coefficient, which serves to ascertain the level of Supplier risk and, subsequently, to take suitable risk mitigation measures.

Activity Risk

Groupe Rocher has established an internal scoring system for the activities of its top-level Suppliers. The scoring system was created thanks to the expertise of the members of the CSR and Purchasing teams. The method is based on objective criteria which are used to assess each activity.

The following types of risk are addressed through the criteria retained:

- **Environment:** damage, consumption of resources, pollution generation, etc.
- **Social - business practices:** qualification level of the workforce (risk of child labor, forced labor, etc. often due to a workforce without any qualifications).
- **Employee health and safety:** chemical products, mechanical hazards, etc.
- **Technical complexity of the activity:** a low level of technical complexity entails a high risk of poor-quality subcontracting.
- **Length of the supply chain:** the longer the supply chain, the more difficult it is to control.

Country Risk

To assess this risk, Groupe Rocher relies on the independent external body, EcoVadis, known for its expertise in CSR. EcoVadis evaluates each country and then gives it a score on the basis of a wide range of CSR data related to environment, health and social issues, corruption, anti-competitive practices and human rights. The EcoVadis method also includes some non-CSR indicators such as the political stability or country competitiveness.

Turnover Risk

Level of risk is determined by the amount of turnover. This risk is categorized based on three different thresholds.

Using the three coefficients defined above, each Groupe Rocher Supplier obtains a “Supplier Vigilance” coefficient.

Assessment policy

Determination of the type of audit to be conducted

The assessment policy for each Supplier derives from the global vigilance coefficient. Various profiles can be identified:

- If the “Supplier Vigilance” coefficient is between 1 and 5: supplier risk is considered to be low.
- If the “Supplier Vigilance” coefficient is between 6 and 10: supplier risk is considered to be medium-high. A documentary audit is therefore required. A documentary assessment of the Supplier’s CSR practices is conducted with the assistance of Groupe Rocher’s above-mentioned independent CSR body, EcoVadis. The Supplier is questioned about its practices and results regarding the environment, the fight against corruption, human rights, health and safety, etc.
- If the “Supplier Vigilance” coefficient is between 11 and 27: supplier risk is considered to be high. A field audit is required on the Supplier’s site. It can be conducted either by the internal auditors Group’s teams of or by a specialist and recognized external firm.

In the event the Supplier calls the principle of the assessment into question:

During the first deployment phase, the Group encountered some objections from partners. In a spirit of cooperation and to facilitate the introduction of the duty of vigilance policy, a special dispensation

may be applied in limited cases. However, these exceptional measures must not be considered to be permanent. Therefore, any Supplier that refuses an assessment over a prolonged period of time shall be examined by the Governance Committee.

Conducting of field audits

For the audits, Groupe Rocher decided to draw on international standards (SMETA) and official service providers, as well as develop the expertise of its internal teams.

When a field audit has to be conducted, there are two possible solutions to ensure this requirement is fulfilled as well as possible:

Adherence to Sedex

To strengthen the current system, the Group decided to join the SEDEX initiative. The purpose of this initiative is to pool SMETA audit reports within a group of members that includes suppliers and instructing parties that operate in certain business sectors. As the global cosmetics ecosystem has a strong presence within SMETA, the Group's entities shall benefit from the pooling of these reports to rapidly increase the coverage percentage of field assessments that they have to conduct.

Undertaking of a specific audit

If the Supplier is not assessed in Sedex, a specific audit will have to be commissioned. Depending on the various elements of the risk analysis, the audit may be conducted either by internal teams trained in QSE audits or by specialist subcontractors. The latter is preferred in the case of a technical issue that requires specific expertise or in the case of social audits conducted abroad (as knowledge of the language and of the local legislation is necessary).

Thanks to the coexistence of these different systems, the teams are involved in a regular examination of our tools and also acquire a high expertise in certain specific issues.

Implementation of action plans following the assessments

Following the documentary or field audits, on the basis of which a performance score is determined, some suppliers have to draw up an action plan.

The level of monitoring applied by Groupe Rocher's teams depends on the assessment's results (audits), and is adapted to each case:

- **Case 1:** The **EcoVadis documentary score** is **equal to or above 35**, or the **field audit score** corresponds to a **confirmed CSR performance**. The level of maturity of social and environmental practices obtained by the Supplier is considered by the Group to be satisfactory, and basically meets to the Group's requirements. **No additional action will be taken.**
- **Case 2:** The **EcoVadis documentary score** is **under 35**, indicating a partial, **unsatisfactory** level of CSR performance, or the conclusions of the **field audit** bring to light critical nonconformities. The level of maturity of social and environmental practices reached by the Supplier is not compliant (due to the presence of nonconformities) but seems to be reachable by undertaking an **action plan (leading to nonconformities removal)**. Launching the action plan is the **Supplier's responsibility**. On the other hand, **Groupe Rocher** will follow-up its **implementation**.

- **Case 3:** If, following the audits, the **Supplier is too far from meeting the Group's social and environmental requirements (with ultra-critical nonconformities)**, or refuses to launch an action plan, or it seems to be too difficult for the Supplier to be able to reach requirements level. **Expulsion from the Supplier panel** must then be considered, and must be arbitrated by the **Governance Committee**, while complying with any applicable legislation.

If it is shown that a risk is not linked to the practices of a given Supplier, but rather to geographical region maturity or inherent practices to a given industrial sector, Groupe Rocher may then decide to seek an alternative source for its supplies.

Finally, the goal pursued by the Group is to control risks throughout its entire panel. It is for this reason that the aforementioned method applies to the existing panel and has also been integrated into the qualification process in place for new suppliers (see 2.3.3.1). This dual approach will ensure the panel's conformity as soon as deployment will be over.

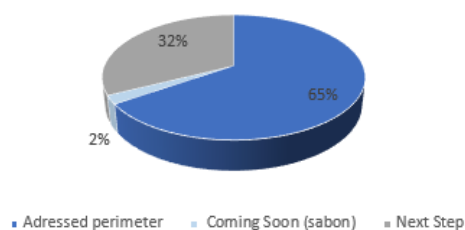
Deployment process

Progressive deployment by each subsidiary

The Vigilance Plan implementation approach chosen by Groupe Rocher is based on the plan's deployment by brand/subsidiary (see Appendix 3).

In 2019, the brands, Arbonne, Flormar and Stanhome adopted the deployment process, joining those that were already part of it (Yves Rocher, Petit Bateau, Daniel Jouvance and Dr Pierre Ricaud).


Suivi déploiement Groupe du devoir de vigilance
Périmètre adressé
KPIs ROCKS 2019



To date, 65% of the Group's total purchases are covered by the implementation of the Vigilance Plan. Coverage shall rise to 67% in the first quarter of 2020 when Sabon joins the process.

The remaining purchases particularly relate to those made by the commercial subsidiaries and mainly concern the provision of services: activities identified as low risk. Nevertheless, we aim to cover this profile in the future: the methods of this deployment will have to be defined in 2020.

From an operational point of view, when the implementation of the Vigilance Plan is effective, the Supplier profiles are monitored by the different subsidiaries' Purchasing or Quality & CSR teams.



In order to provide them with methodological or decision-making assistance, and also to improve the responsiveness of the overall system, local coordinators are identified in the various departments of the parent company or in the Group's subsidiaries. Their mission is to ensure the successful application of duty of vigilance deployment within internal teams while creating an environment in which participants can share their expertise with each other.

Performance indicators

In order to ensure that requirements of the Duty of vigilance law are met, the Group has implemented several performance indicators. They bring three important factors under control:

- The progress of the deployment process within subsidiaries
- The results of risk mapping
- The performance of the panel being assessed

These indicators confirm that the deployment of the Vigilance Plan is compliant and exhaustive, that the risks identified have been reduced and, by extension, that the system in place is suitable.

Alert mechanism and collection of alerts

In accordance with the French Sapin 2 law concerning economic transparency, a mechanism is in place within Groupe Rocher to collect alerts. An ethical line through a single email address (ethics@yrnet.com) enables all employees who want to report any breach of the Group's ethical principles. For some subsidiaries, this ethical contact point is added to the existing reporting systems specific to some subsidiaries, as it is the case for Flormar and Arbonne.

To meet the requirements of the Duty of vigilance law, the Group decided to capitalize on this system and open it up to all of the Group's third parties/partners as from 2017.

In 2019, the Group's ethical contact point directly received five alerts; Flormar's ethical contact point received 10 alerts and Arbonne received nine alerts. In most cases, the alerts are about issues mainly in the hand of Human Resources Department.

Results of risk mapping and mitigation actions taken

Results of risk mapping

Risk mapping takes place in two separate phases, those results are presented in the following sections.

Overview of the regions and purchasing activities at risk

Initially, the Group analyzed the nature of the purchases made by the various entities in order to classify them in activity categories. These categories were rated to identify those most at risk (see Method section)

The categories identified as high risk are:

- Purchase of gifts and accessories
- Purchase of raw materials, particularly plant-based
- Purchase of textile components
- Purchase of certain packaging articles (plastic, cardboard, glass, etc.)
- Purchase of finished-product subcontracting
- Purchase of store consumables
- Logistics purchases

In addition, some supply chains are located in countries where CSR risk is also considered to be high (see Method section). The Group makes, in particular, a share of its purchases in Asia and Turkey but also in Russia and Mexico.

This overview served to create a roadmap as well as to identify deployment priorities in certain regions or entities. Nevertheless, it must be complemented by a more detailed analysis that allocates a vigilance coefficient to each supplier as the next stage of the risk assessment (audit) will have to be deployed at this level. This detailed analysis takes up the second phase of the risk mapping process.

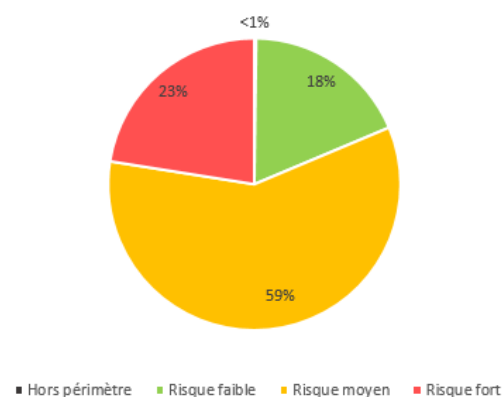
Performance of the existing panel of Suppliers

At the end of the risk mapping phase, as described in the method section, each supplier on the panel is quoted with a vigilance coefficient that determines the type of assessment that the supplier must undergo. The breakdown of the panel, as shown below, is regularly monitored to ensure that the Group's exposure to risk remains globally stable.

Groupe ROCHER Cartographie des risques RSE Step 1&2

Répartition en CA * (Chiffre d'affaires 2018)

KPIs ROCKS 2019



2018 – 2019 Change:

- High risk → the percentage of field audits is stable, enabling the planned deployment strategy with a three-year audit validity period to be confirmed.

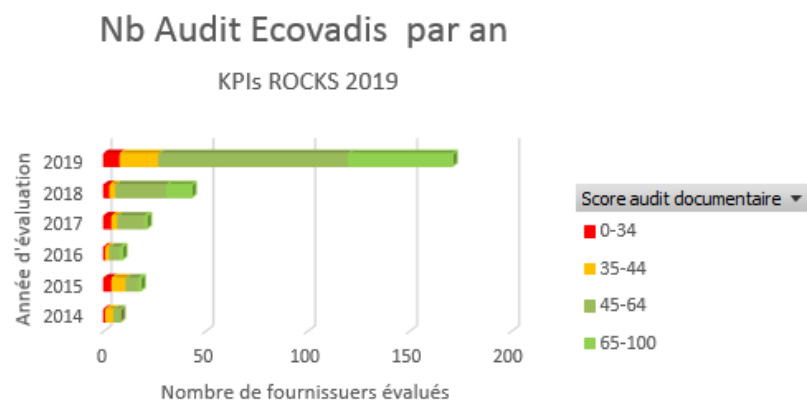
- Medium risk → However, the number of Suppliers monitored in EcoVadis is rising. This is due to the introduction of new entities, particularly Arbonne in 2019 with additional coverage of 98 million euros of purchases.

Assessment of the panel's performance

Documentary audits: Volume and performance of assessed Suppliers

This tool is one of the pillars of our system: in 2019, 59 % of the purchases covered by the method were made with suppliers subject to a documentary audit. Consequently, the number of suppliers in EcoVadis as well as their performance are regularly monitored.

Volume of EcoVadis audits:



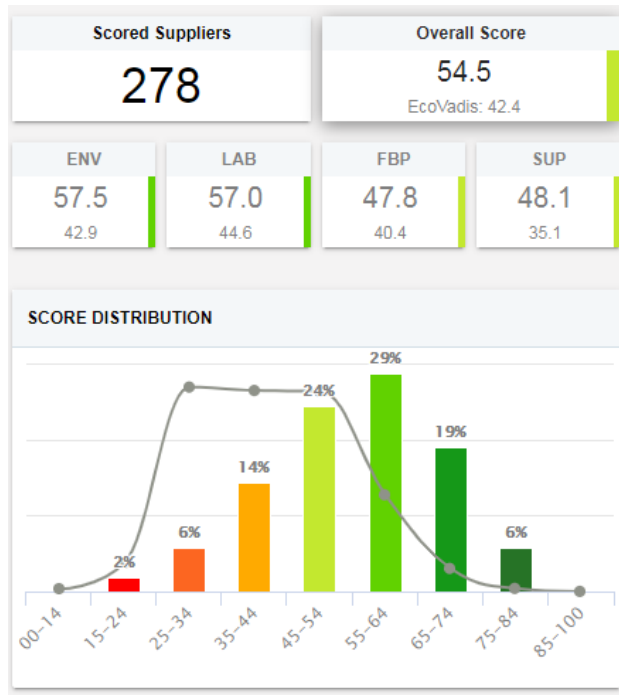
The integration of new subsidiaries into the project has a direct impact on the number of Suppliers monitored in EcoVadis. The increase seen in 2019 is therefore a reflection of the deployment of the Vigilance Plan.

Results for the CSR performance of Suppliers assessed by EcoVadis:

Groupe Rocher currently has 278 Suppliers referenced by EcoVadis, spread between Petit Bateau, Groupe Rocher Operations and other subsidiaries. This number is constantly rising (164 Suppliers in the database at the end of 2018).

Above-average CSR performance by the Group's Suppliers:

Groupe Rocher aims to be an agent of change and a source of inspiration with regard to the management of, and assistance to, its Suppliers. This ambition is shown by a global EcoVadis score for its Suppliers of 54.5, or 12.1 points above the average of all the Suppliers referenced by EcoVadis.



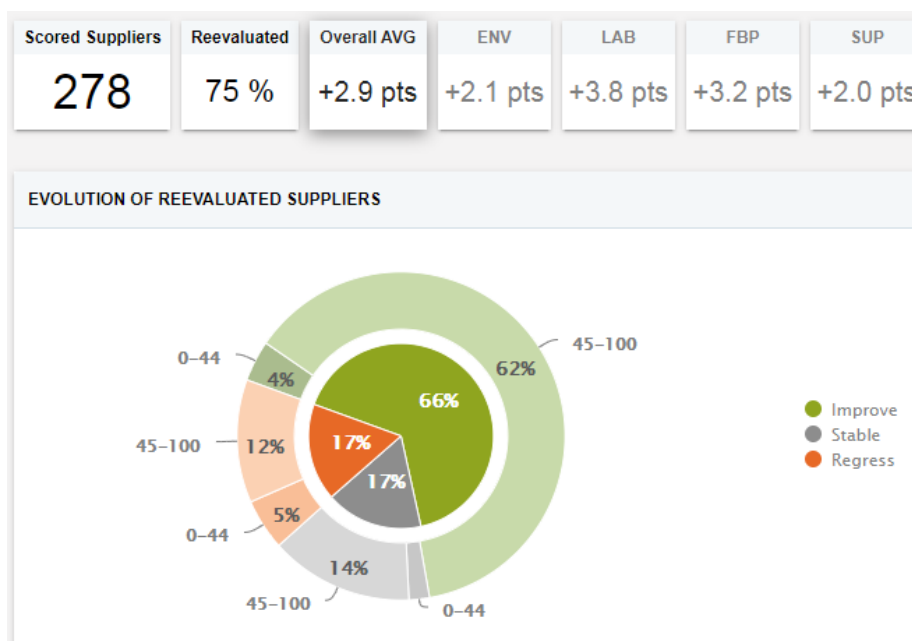
Score distribution chart:

- The gray curve is the average score of companies assessed by EcoVadis.
- The color histograms represent the breakdown of the results of Groupe ROCHER's suppliers.

In addition, the average score of the Suppliers assessed for the Group improved between 2018 and 2019 with an average score of 54.5 in 2019 compared to 53.6 in 2018, thereby testifying to the general progress made by the panel.

Suppliers committed to a process of continuous improvement:

Groupe Rocher naturally wants the very highest standards for the monitoring of its Suppliers. After adjusting the monitoring system and reassessing all the Group's Suppliers, the latter gained 2.9 points and 66% (namely, 138 Suppliers) improved their CSR performance.

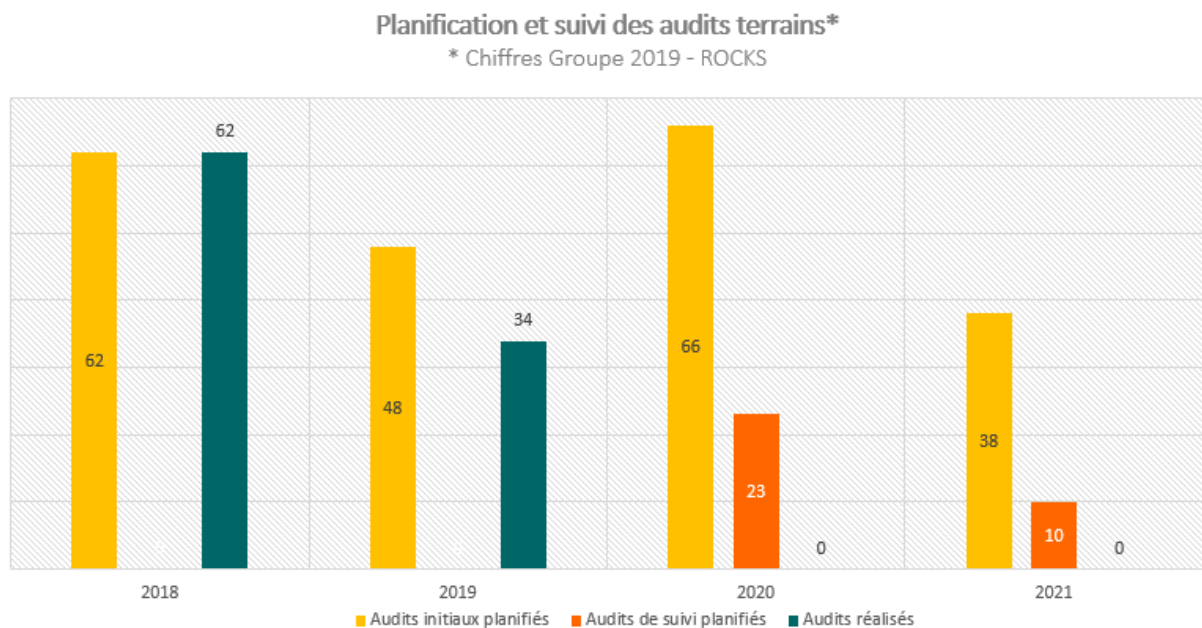


Field audits: Volume and performance of assessed Suppliers

This type of assessment represents 23% of the Group's purchases. In accordance with the situation described in the overview of risk mapping, some geographical regions are particularly concerned (China, Russia, etc.). Local entities have therefore taken action by providing specific resources and budgets.

As is the case for documentary audits, a volume indicator is monitored, on one hand, to ensure that forecasts match the deployment of the audits and, on the other, to foresee the resources that are required during the budget year.

- Volume and rate of completion of field audits (scheduled over three years):



2019 results: This year, the Group conducted 34 field audits. All of these audits were made by subsidiaries that form part of “Step 1” of the Vigilance Plan (see Appendix 3). Performance fell below the deployment goals initially foreseen, particularly due to budgetary trade-offs regarding the Petit Bateau brand.


The volume of audits to be conducted shall grow in the coming years due not only to the integration of new entities but also because some of the Brands or subsidiaries that form part of “Step 2” (see Appendix 3) are located in risk-prone regions or have less mature purchasing processes.

Risk control and mitigation actions

Corrective action plan following the identification of a Supplier or sector risk

Return to compliance of the supplier: a cooperative approach

After the various field audits have been conducted, areas for improvement may be identified for certain Suppliers. Depending on the criticality of the nonconformities found, some Suppliers were asked to produce action plans, in compliance with the method.



In all cases, Groupe Rocher opted for a cooperative approach. While the supplier is responsible for producing the action plan, we can - on the latter's request - provide technical and/or methodological support. Both parties approve the progress plan, which contains a schedule and a specific date for the follow-up audit in order to confirm the resolution of the nonconformities.

Sensitive sectors

The requirements of the Law are as important as they are difficult to meet for a large share of our partners, and certain sectors remain sensitive despite the efforts made. It is for this reason that Groupe Rocher implemented a specific process for some of these sectors.

For example, the Group takes part in several sector-based initiatives that aim to:

- Boost the presence of cosmetics players within certain sectors in order to bring about a change in practices;
- Align the expectations of instructing parties in order to facilitate their implementation by Suppliers;
- Pool financial resources and allocate them to joint actions.

The Group is a member of the Responsible Mica Initiative in order to play a role in improving the conditions under which mica is mined in India. We are also active in the palm-oil sector through a partnership with the Earthworm Foundation, with which we are involved in local programs that support small producers. Alongside these actions, the Group is working on finding geographical and/or technological alternatives.

Aside from these operational action plans, the Group is implementing a large number of risk mitigation measures. Some of these measures are preventive in nature in order to help identifying the risk and to enhance the expertise of the ecosystem, for example. We describe some of these risk mitigation measures in the next section.

A committed ecosystem

To be able to establish a lasting dynamic, the Group has to be able to mobilize an entire ecosystem: the teams, on the one hand, and the Suppliers, on the other.

Commitment of the teams

Changes to the Group's internal and external environment have given the Vigilance Plan a weight that now transcends the legal framework. In fact, the Group has reaffirmed through its new B Corp status, its willingness to put social, societal and environmental matters at the center of its concerns.

Our approach must integrate and draw on this mandate by making tools available, as discussed in the previous section, and by accompanying the teams as their operating methods evolve. This dimension is at the heart of the strategy that we have defined and that shall be fully deployed in 2020.



A network of experts

The deployment of the Vigilance Plan in each of the subsidiaries comes along with the identification of project coordinators. Their role is to become experts in the method implemented. Training of the teams creates coordinators who are inured to the realities in the field and can therefore act as strong intermediaries. Once these coordinators have assimilated the method and the initiatives taken, they can share their knowledge with all the Purchasing teams for deployment with Suppliers and to explain the Group's Vigilance Plan.

An advanced training module intended for the coordinators is currently being designed to enable them to acquire the skills and tools required for their roles as intermediaries. After completing the module, they will be able to read and analyze an audit report and implement the action plans required and, more generally, embody the Group's various positions.

Systematic awareness-raising among all of the teams


The Group is also convinced that the duty of vigilance is a central problem that all Purchasing teams need to be made aware of. In this way, it ensures that the importance of controlling Supplier risk is clearly identified and taken on board by all teams. For this purpose, several tools have been defined:

- Meetings specially dedicated to the Vigilance Plan were held throughout 2019 so that everybody could understand the need for the method adopted by the Group, and for phase-by-phase assistance with its implementation.
- E-learning: in order to promote awareness of the Duty of vigilance law, the CSR teams and Risk Management have prepared an interactive module intended for the various functions of the Group, including, in particular, the Management team of each subsidiary and all the Purchasing teams. This 20-minute e-learning training session educates teams through quizzes and case studies. The aim is to explain the context to all participants and to help them understand the Duty of vigilance law.

The Supplier ecosystem:

Over and above the training of its teams, the challenge for Groupe Rocher is to raise awareness for an entire ecosystem. This Supplier ecosystem is managed in such way as to develop mutual awareness between the Group and its Suppliers, associated in a process of sustained continuous improvement through a system of operational assistance. Groupe Rocher seeks to install a permanent climate of reciprocal trust.

Thanks to tools such as the Supplier portal, which contains the Code of Business Conduct as well as communication aids specially created for the Group's various Suppliers, Groupe Rocher moves forward alongside them in its deployment of the Vigilance Plan. The Group reference document will also provide guidance to Suppliers during this process. In addition, the duty of vigilance is the matter of regular exchanges: Business Reviews, inspections, audits, etc. enable the parties to emulate one another and boost their expertise.



Finally, the Group was keen to work with other companies in the cosmetics sector on simplifying the approach to the duty of vigilance for suppliers by homogenizing requirements. The Responsible Beauty Initiative, coordinated by EcoVadis, is responsible for organizing this process.

Process and information system

Approval process

In order to provide a suitable response to the new management challenges of our panels, the Group revised its Suppliers' approval process.

The revised approval process details and outlines the various stages that form part of the process, the data to be collected and the dispensation tools and cases, as well as the arbitration bodies. It also enables several types of risk to be assessed while integrating a large number of parameters inherent to the Supplier's activity, its location, certificates and past performance.

This process is governed by a procedure that is disseminated while the Vigilance Plan is being deployed. A training module was specially developed and distributed among the Purchasing teams of Groupe Rocher Operations in 2019. Deployment in the other subsidiaries shall continue in 2020.

Information system

The implementation of this process and the extension of the Vigilance Plan to the various entities of the Group revealed two key elements for the continuation of our work:


- In order to guarantee a high standard of execution throughout the world, the process has to be as clear and as simple to apply as possible.
- The risk mapping and assessment systems generate a very large amount of data that has to be easy to use to ensure that the project runs smoothly and that the system is effective.

In order to respond to these new challenges, the Group introduced a specific information system that enables the automation of the approval process as well as the consolidation of all of the data related to the risks and to the performance of each Supplier on the panel.

This information is available on a specific platform that shall be accessible to the teams of the various Group entities as well as our Suppliers, providing an effective and iterative overview of their performance.

Identified milestones

A reference document formalizing the Group's requirements



The start of the “post-audit” action-plan phase, which is key to meet risk-reduction goals, revealed the need to make changes to the system. In the method developed by the Group, the assessment systems and tools are defined for and common to all entities: EcoVadis for the documentary audits and the SMETA standard for the field audits. However, the regular implementation of these tools among our Suppliers, in different activities and geographical regions, revealed an additional need: the need to define and formalize the Group's requirements regarding various areas of the Duty of vigilance law.

The purpose of this reference document is to support several changes:

- Implementation of corrective action plans: in addition to the assessment, the provision of a document explaining the Group's requirements will give the teams and our Suppliers a specific and homogenized goal.
- Management of equivalent standards or certificates: in order to make the assessment system's implementation process more flexible in the various regions and activities.
- Embedding of strong basic principles and of a common language so that the internal teams and our Suppliers can embrace the Vigilance Plan on an operational level.

It will be created in 2020.

Conclusion

The implementation of the duty of vigilance within the Group is now a robust process that is supported by organizational, methodological and operational principles that are defined and shared.

Deployment and effectiveness of the Vigilance Plan are steered thanks to performance indicators that are regularly monitored. As a result, the Group now covers more than 70% of its purchases and the performance of Suppliers is constantly improving. Risk-prone categories, regions, Suppliers and sectors are identified and are the subject of suitable mitigation measures. The ethical contact point is in place and being used.

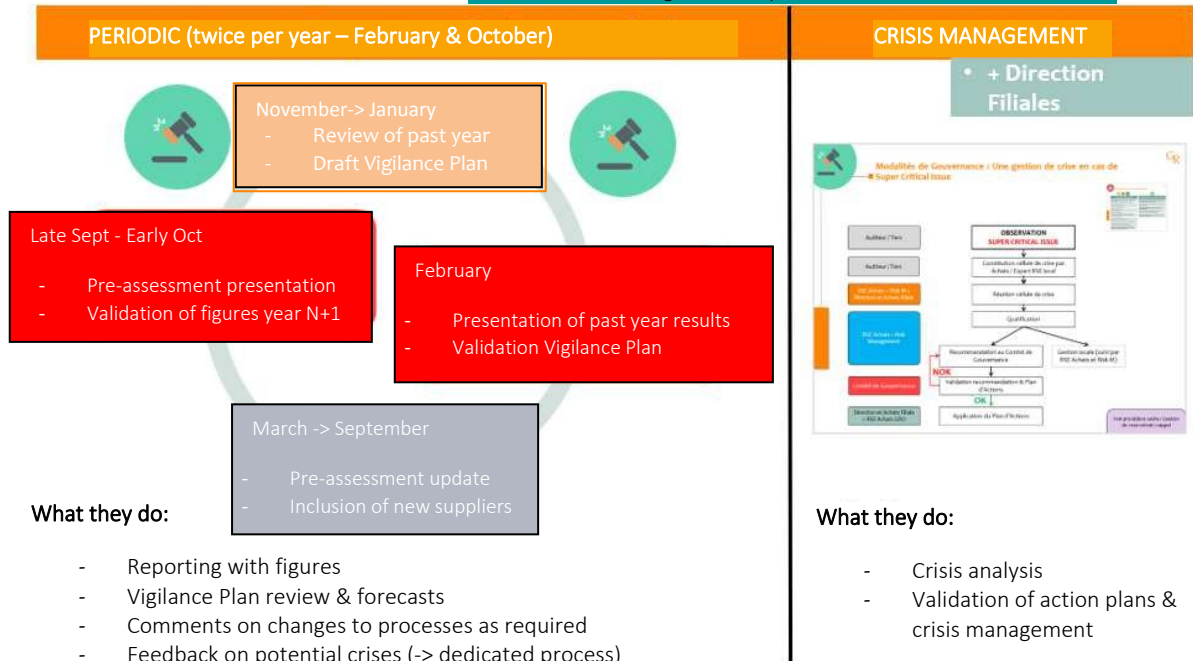
The Group has always been particularly committed to the construction and management of a sustainable ecosystem and has seized this new opportunity to work with its suppliers on the introduction of more respectful practices within its supply chains.

Appendices



Appendix 1: c

WHO THEY ARE:

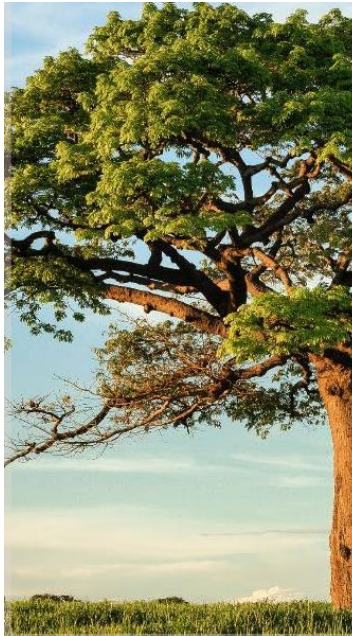
- Senior Management
- Legal Department
- Purchasing Department
- Sustainable Development Department
- Risk Management Department



Appendix 2: Super Critical Issues

Category	Clause Requirements
<p>SOCIAL</p> 	Use of workers below the legal age of employment or Code Provision of 15 (In accordance with OIT standards)
	Any type of prison, bonded, indentured or forced labor
	Physical punishment or abuse
	Evidence of Sexual Harassment
	Non-payment of wages
	Structurally unsafe building
	Documents provided are intentionally falsified
	Forced pregnancy testing as a condition of employment
	Forced use of contraception
	Termination of workers for pregnancy
	Employees are intentionally "coached" with misleading, inaccurate information for the purpose of providing standard answers to questions asked by auditors
	Denying access to the facility to avoid the facility evaluation
	<p>ENVIRONMENT</p> 
Factory management did not allow access to documents required to assess compliance	
Documentation provided during the assessment process appeared to be falsified	
Factory management did not allow auditor(s) to interview employees in a private and confidential manner	
Any immediate hazardous impact which will lead to severe pollution and/or worker's safety	

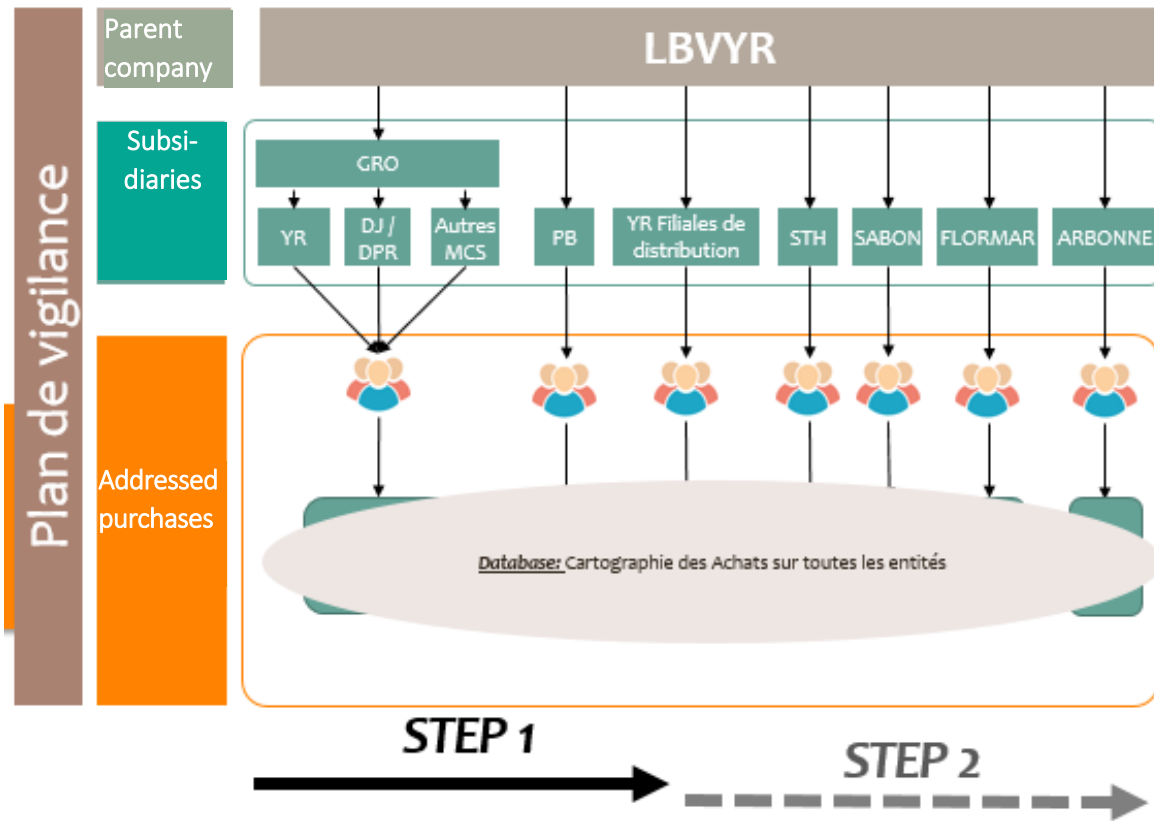
Appendix 3: Groupe ROCHER



10 BRANDS



Present in more than 120 countries



Appendix 4: Reference texts

Text	ECOVDIS	SEDEX -SMETA
International Labor Organization Conventions	✓	
Principles of the United Nations Global Compact	✓	
UN guidelines (Companies/Human Rights)	✓	
Ethical Trading Initiative Base Code		✓
Global Reporting Initiative Standards	✓	
ISO 26 000 Standard	✓	
SA 8000 Standard		✓
ISO 14001 Standard		✓
CERES Principles (Coalition for Environmentally Responsible Economies)	✓	
Documentation for the Global Social Compliance Program (GSCP)		✓