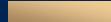




# California Transparency in Supply Chains Act of 2010 disclosure and UK Modern Slavery Act Statement

**COTY**  
SINCE 1904



## DECEMBER 2025

THIS DOCUMENT IS INTENDED TO SERVE AS:

- (1) Annual statement required to be published for the purposes of the United Kingdom's Modern Slavery Act 2015.
- (2) The required disclosure for the purposes of the California Transparency in Supply Chains Act of 2010.

Consistent with Coty Inc.'s ("Coty" or "We" or "Our") longstanding commitment to excellence and corporate responsibility, including its commitment to employees and consumers throughout the world and to the communities and the environment in which Coty and its products are present, Coty confirms its dedication to ensuring that the supply chains it employs in the sourcing and manufacturing of its products do not include, utilize or tolerate human trafficking, slavery and forced or child labor.

Consistent with its assessment of the potential risks, and in accordance with the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act 2015 (the "Acts"), Coty describes below the efforts that it makes and has made over the past financial year (1 July 2024 - 30 June 2025, which we refer to in this statement as "FY2025" or "fiscal 2025") to ensure human trafficking, slavery and forced or child labor are not present in its operations or the operations of its contractors, subcontractors and suppliers (together "Business Partners").

### ORGANIZATIONAL STRUCTURE AND SUPPLY CHAIN

Coty is one of the world's largest beauty companies with an iconic portfolio of brands across fragrance, color cosmetics, and skin and body care. In FY2025, Coty had approximately 11,636 full-time employees in over 36 countries. In addition, Coty typically employs a large number of seasonal contractors during our peak manufacturing and promotional season. Coty markets, sells and distributes products in approximately 123 countries and territories and operates through two divisions:

- Consumer Beauty is primarily focused on mass color cosmetics, body care, fragrances and nail care products.
- Prestige is primarily focused on premium fragrances, skincare and cosmetics.

Our supply chain enables the production of our beauty products and daily business operations.

- **Beauty products:** We manufacture, market, sell and distribute a range of beauty products for consumers to enjoy. We manufacture and package approximately 81% of our products, primarily in facilities located in the United States, Brazil, and various countries in Europe. We continue to utilize a network of third-party manufacturers (TPMs) on a global basis who produce approximately 19% of our finished products.
- **Raw materials:** The principal raw materials used in the manufacture of our products are primarily essential oils, fragrance oils, alcohols and specialty chemicals. The essential and fragrance oils in our fragrance products are generally sourced from fragrance houses. We purchase raw materials from various third parties. We also

purchase packaging components that are manufactured to our design specifications. We have identified raw materials where there is an increased risk of human and labor rights abuses – mica, palm oil and some of the natural ingredients within fragrance oils – and continue to work to mitigate this risk.

- **Licensors:** We have a diverse portfolio of brands. As of June 30, 2025, we maintained 22 brand licenses. We engage the licensors to ensure specific conditions are met, including the behavior of our suppliers, distributors and retailers.
- **Business operations:** As a large global organization, we have other supply chain activities which include offices, marketing, retail stores and websites.

## **BEAUTY THAT LASTS STRATEGY**

In February 2020, we launched our dedicated sustainability strategy, *Beauty that Lasts*. It is guided by the United Nations Sustainable Development Goals (SDGs) to address the social, environmental and ethical impacts of our business. It is focused on: the Beauty of our Planet, our People, and Governed Beautifully, with the Beauty of our Products at the center. We have set time-bound targets to help us on our path to delivering a more sustainable and inclusive world.

“Beauty of our People” priorities include sourcing our ingredients with respect for human rights, supply chain transparency, and building a more inclusive business. “Governed Beautifully” is focused on the integration of responsible business practices across our company and value chain, including our expectations for employees and business partners on ethical behavior. Our “Planet” pillar sets out how we aim to minimize our environmental impact, including sustainable innovation, and packaging based on circular design. Our products are at the heart of everything we do and therefore a focus across each of these areas.

## **APPROACH TO HUMAN RIGHTS**

We believe that everyone has the right to be treated with dignity and respect, and we are committed to respecting and promoting fundamental human rights throughout our own operations and extended supply chain.

We are dedicated to actively identifying and addressing actual or potential human rights violations within our sourcing and manufacturing supply chains, and working to ensure that they do not include, utilize or tolerate human trafficking, slavery and forced or child labor and comply with all applicable laws. Our [Human Rights Policy](#) sets out this commitment and our approach to Identification, Assessment and Prevention; Remediation; and Grievance Mechanisms.

Within our own business, we want to ensure that all our associates work in a safe environment that is based on equal opportunity and is free from discrimination or harassment. In line with ILO standards and our own severity mapping model, we view child labor and forced labor as the most critical human rights issues in our value chain. As such, they are a core focus of our due diligence and risk mitigation efforts. We do not tolerate child labor under any circumstances, in line with ILO Convention No. 138, and expect all Coty entities and business partners to comply with all applicable laws and international standards. Coty strictly prohibits all forms of forced labor. We require our associates and

business partners to comply with local law and relevant international standards such as ILO Convention No. 29 to ensure that employment is always freely chosen and not imposed under threat or penalty.

Our policies in this area are guided by international standards including the UN Declaration of Human Rights, the fundamental rights set out in the International Labour Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. We have been a signatory to the UN Global Compact (UNGC) since 2015 and support the ten principles on human rights, labor, environment and anti-corruption. Coty is a corporate member to the UNGC Netherlands Network and Coty Brazil has joined the UNGC Brazil Network. Being part of these networks helps us develop our understanding in identifying and managing sustainability topics, including risks related to human and labor rights.

We are also involved in a number of industry efforts and membership-based organizations related to respecting and advancing human rights in a non-competitive manner:

- The Responsible Mica Initiative (RMI), a multi-stakeholder action group aims to establish a responsible Indian mica supply chain by promoting standards, legal frameworks, and community empowerment programs,. For further information, see page 7.
- The Roundtable on Sustainable Palm Oil (RSPO) aims to reduce the impact of the palm oil supply chain on human rights as well as biodiversity and the environment. We are working towards the ambition for all our palm oil purchases to be RSPO-sourced.
- The Action for Sustainable Derivatives (ASD) is an industry-led collaboration that seeks to achieve the responsible production and sourcing of palm oil derivatives. We have partnered with ASD to map our palm oil derivatives supply chain.
- Fair Labor Association's Harvesting the Future works to improve rights and working conditions for seasonal agricultural workers and their families, see more on page 8.
- BSR is a global network of more than 300 companies dedicated to building better businesses through innovative sustainability solutions, see more on page 7.
- The Responsible Beauty Initiative (RBI) is a beauty industry effort to improve sustainability across supply chains by sharing best practices. By leveraging a common pool of EcoVadis scorecards, the beauty sector collaborates to track, address and improve challenges including human and labor rights.
- Sedex, or Suppliers' Ethical Data Exchange, is an online portal for storing suppliers' self-assessment and audit documentation, focused on the pillars of Labor Standards; Health & Safety; Environment and Business Ethics. See more on page 6.

## INTERNAL POLICIES AND TRAINING

Our associates are key to ensuring our business continues to operate to a high ethical standard and internal accountability is fostered. Our associate [Code of Conduct](#) sets out what our employees must do to ensure these high standards, and outlines the reporting process and protocol if they have any concerns. Associates are expected to adhere to our Code of Conduct, which is available in multiple languages. Training is provided to new associates, with additional training throughout the years.

Our global compliance program, 'Behave Beautifully', is designed to detect and prevent violations of the law and promote a culture of ethical business practice. Our compliance program sets out our standards across a number of areas, including anti-bribery and corruption, competition law, data privacy, and prevention of harassment and discrimination. We aim for 95% of associates to complete compliance training annually by 2025. In FY2025, 95% of employees were trained in one or more compliance modules.

For our associates in our Procurement team who play a key role in upholding our Sustainable Sourcing Framework, we use the EcoVadis Academy to enhance their capability to engage effectively with suppliers on sustainability issues. All new procurement employees also complete onboarding training that embeds these practices from the outset.

## SUPPLY CHAIN POLICIES

Our commitment to respecting human rights extends throughout our supply chain to our Business Partners. With a complex global supply chain, it is essential that we work closely with suppliers to manage any potential risks and help build a better, more sustainable business. Our [Sustainable Sourcing Policy](#) outlines our approach to ensuring the integrity, sustainability, and ethical standards of our supply chain through sourcing practices.

We require suppliers to adhere to our [Code of Conduct for Business Partners](#) (CoC), which sets out our expectations for anti-corruption, data privacy and human and labor rights, among other practices. Compliance with the CoC, or agreed equivalent, is a requirement of working with us and we also embed sustainable sourcing requirements into contractual agreements.

The Code of Conduct for Business Partners is based on international human and labor rights standards, and slavery and human trafficking in their own businesses and materials supply chains. In our FY25, 86% of our total spend was with suppliers who have signed our Code of Conduct for Business Partners or where an agreed equivalent solution has been implemented.

Our sustainable sourcing program, which has been deployed among buyers, includes key indicators to monitor progress. Supplier performance is considered when: Assessing performance of existing suppliers, defining a supplier panel to be briefed, awarding business, and identifying potential new suppliers. We track the effectiveness of our actions through annual business reviews with suppliers as well as ongoing monitoring of progress against our targets. Our supplier business review scorecards integrate specific sustainability elements related to environmental and social KPIs. Key strategic suppliers are ranked and engaged according to the results of the scorecards.

Our compliance function also uses third-party due diligence tools and processes designed to evaluate whether our Business Partners are conducting their respective businesses

ethically and lawfully. New high-risk vendors and suppliers are required to complete this due diligence program.

## ASSESSING AND ADDRESSING RISKS

### TIER 1 SUPPLIERS

We monitor supplier social and environmental performance through third-party assessments, including EcoVadis scorecards, Sedex self-assessments, and on-site audits. After signing the CoC, all sites undergo a risk assessment and receive a risk level. Low- and medium risk sites must demonstrate sustainability performance via Sedex or EcoVadis assessments. High-risk sites are audited against the four pillars of the SMETA protocol.

We use the Sedex risk assessment to determine high risk sites. This considers the country, sector and commodity risk. In FY2025, 100% of suppliers were risk assessed using this tool. Of those deemed high risk, 100% of suppliers in target categories<sup>1</sup> were then audited using the [SMETA](#) (Sedex members ethical trade audit) third-party audit. Audits are performed by independent auditors and can be semi-announced (with a three-to-four-week audit window) or unannounced. Where there is an audit already in place, we accept an announced audit but request all future audits to be semi-announced. These audits take place every two years. Suppliers can select an auditor from an approved list who are [Sedex affiliate audit companies](#) and members of the Association of Professional Social Compliance Auditors (APSCA). Audits cover the areas of:

- Labor and human rights (including modern slavery)
- Health and safety
- Environmental standards
- Business ethics

Through our Sedex partnership, we have a sustainability coordinator dedicated to Coty from Sedex, who assists in the whole process and engages with our suppliers and buying teams to work together on compliance.

We use both Sedex and EcoVadis to demonstrate and assess ongoing supplier performance. In FY25, 79% of spend was covered by an approved third-party assessment. EcoVadis assesses environmental and social performance based on supplier documentation related to the four key areas:

- Environment
- Labor and Human Rights
- Ethics
- Sustainable Procurement

EcoVadis analysts assess our suppliers' documentation related to these areas as well as analyze their performance through a thorough 360° process. With EcoVadis, both Coty and the supplier receive a report based on supporting documents from the supplier and 100,000 data points and references, including from governments, charities, trade associations and

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<sup>1</sup> Defined as those providing raw materials, packaging, third-party manufacturing (TPM), advertising & consumer promotion, and logistics partners, with amounts exceeding 50,000, according to the applicable subcategories.

stakeholders. Our suppliers' EcoVadis performance continues to outperform benchmark with an average score of 66.1, which was 17.8 points above the overall EcoVadis average.

We value our partnerships and want to help stakeholders improve their sustainability performance. We support suppliers in improving their practices on an ongoing basis. For Tier 1 partners, our procurement leadership team meets monthly to review supplier assessments and identify escalations. When a risk is identified, corrective action plans with defined timelines are set to support suppliers to improve practices. Our Sustainable Sourcing Team and category buyers work together with Tier 1 partners to clearly define next steps and any support required on follow-up actions. In cases of serious or repeated breaches without meaningful efforts to improve, we may terminate business relationships.

## **OUR EXTENDED VALUE CHAIN**

In addition to our supplier assessment process, we recognize the need for enhanced due diligence where we identify potential risks beyond our tier 1 suppliers.

To enhance our identification of potential sensitive supply chains, together with third party experts BSR we conducted a human rights risk mapping of all Coty's procurement functions against leading recognized indicators. The resulting risk scores allow us to better prioritize risks by country, category, and issue, and to identify human rights risks related to workers in the value chain. This work guides us to further investigate potential risks and in the development of tailored roadmaps on priority areas.

We develop tailored action plans for identified sensitive supply chains. This includes mica and certain natural ingredients used in our fragrance oils.

Mica is a key raw material used in many of our products to provide a pearlescent effect. Coty sources mica from different countries, including India. Within certain states of India there are human and labor rights risks in mining communities. Coty is committed to sourcing mica responsibly. In 2017, we became a founding member of the multi-stakeholder effort, the Responsible Mica Initiative (RMI). Coty supports the RMI's approach of promoting responsible workplace standards, legal frameworks, and community empowerment programs, with traceability as a crucial underpinning. We partner with RMI on community empowerment programs in India and engage our upstream value chain to support compliance with RMI workplace standards or equivalent through capacity building.

We participate in the annual RMI data collection campaign, sharing details of our mica sourcing, and are working towards full traceability of processing units and mines. In FY2025, 34% of our direct mica sourcing was from India. 100% of Tier 1 Indian mica suppliers were RMI members and 97.7% of Indian mica was traced to mine level. Coty is also part of a partnership between the RMI and the supply chain traceability platform, Tilkal. This was the first multi-stakeholder blockchain-based solution to improve traceability across mica supply chains. We also continue to engage our third-party manufacturing partners on their mica sourcing.

Many of the natural ingredients used within our fragrances are sourced from agricultural supply chains and regions where working conditions may increase human rights risks. We are working to develop and implement targeted action plans for priority high-risk naturals, with traceability as a key priority. In FY25, we had traceability for all fragrance naturals country level.

In partnership with the Fair Labor Association's (FLA) 'Harvesting the Future – Fragrances' project, we are supporting programs in Turkey and Egypt to improve working conditions for agricultural workers and their families. This cross-sector initiative brings together government, civil society, producers, and industry to drive positive change. In FY25, we expanded our partnership with FLA, combining insights from our BSR risk assessment with sectoral insights to identify priority naturals and countries for further investigation and collective action.

## **ETHICS & COMPLIANCE HOTLINE**

Coty is committed to maintaining the highest standards of integrity and ethical conduct. We encourage all stakeholders to raise concerns in confidence and offer full assurance that retaliation will not be tolerated.

The Coty Ethics and Compliance Hotline is available globally, accessible in multiple languages, and supports anonymous reporting. All submissions are subject to thorough investigation, with each matter reviewed by the Compliance function to ensure appropriate risk assessment and resolution.

Complaints and issues reported through the hotline are formally documented and monitored. On a quarterly basis, aggregated complaints data and identified risk areas are presented to the Audit and Finance Committee of the Board, reinforcing Coty's commitment to transparency, accountability, and effective governance.

We acknowledge the importance of establishing tailored grievance/complaint mechanisms within sensitive value chains. The need for such mechanisms is evaluated in light of the local context and developed in collaboration with our value chain partners.

*Approved by the Board in December 2025*

Signed by Peter Harf

Chairman of the Board