Louis Vuitton UK

UK Modern Slavery Act 2015 Statement

Introduction

Since the publication of its first Anti Modern Slavery statement in June 2017, Louis Vuitton UK Limited ("LVUK") has continued to focus on extending its work to combat modern slavery into its sourcing and operations chains, notably via the Suppliers’ Code of Conduct, as well as on improving its processes in place to monitor and assess its suppliers’ ethical trading practices.

Business

LVUK is a subsidiary of Louis Vuitton Malletier SAS ("LVM"), which is closely linked to the LVMH Moët Hennessy Louis-Vuitton SE ("LVMH") Group.

LVUK sells luxury and high quality products under the Louis Vuitton trademark as luggage, leather goods, bags, ready-to wear, shoes, watches and jewellery, accessories, perfumes and cosmetics, stationery, home decoration, electronic device, accessories, etc. (the "Products"), to clients in the United Kingdom.

LVUK purchases from LVM the Products which are mainly manufactured through LV industrial subsidiaries (hereinafter LVM and its industrial subsidiaries together designated as the "LV Group") and purchases directly to local suppliers products and services necessary to run its business.

Policies and Practices

LVUK’s commitment is to act with integrity in all its business dealings and to promote ethical conduct, to enhance compliance with applicable laws and to provide guidance with respect to business conduct. It has a number of policies that are relevant to this commitment, which set out what LVUK expects from its employees, internal business and its external suppliers.

Key Policies are:

- **1. LV Group Suppliers’ Code of Conduct** (the "LV Suppliers’ Code of Conduct"), available upon request.

LV Group requires its suppliers, their suppliers and contractors to share its commitments and act in full compliance with the relevant laws, including all national, local and international laws relating to the management of their businesses.
LV UK ensures that LV Group requires its suppliers to obtain prior approval before subcontracting any part of their supply chain process and LV Group's approval is subject to acceptance by the subcontractor of the LV Suppliers' Code of Conduct and all other applicable conditions that LV Group determines.

The LV Suppliers' Code of Conduct was updated in December 2017. It is issued to existing suppliers and attached in new agreements with suppliers. In the LV Suppliers’ Code of Conduct, LV Group establishes its ambition to uphold ethical standards within its supply chains and its expectation that its suppliers will do the same. In the event of suspected or known non-compliance, the LV Suppliers' Code of Conduct provides LVUK with the ability to take remedial action which, in the most severe circumstances, includes terminating the relationship with that supplier.

2. Louis Vuitton Ethical Charter (the “LV Ethical Charter”), available upon request.

Our Anti-modern slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery including human trafficking is not taking place anywhere in our business or supply chains.

LVUK requires its employees, suppliers, their suppliers and contractors to engage in and promote honest and ethical conduct, comply with all applicable laws, rules and regulations in their own area and act responsibly, with due care, competence and diligence when dealing with colleagues, customers, suppliers, agents and intermediaries.

The LV Ethical Charter reiterates the LVMH Code of Conduct and commitment to act to the highest standards of integrity, respect and engagement in their behaviours and in the way that they conduct business every day, everywhere.

The LV Ethical Charter further states that the group companies will inform all of its commercial partners of its ethical principles and expectations and will require its suppliers, their suppliers and contractors to comply with the principles set out in the LV Suppliers’ Code of Conduct. In particular, this code specifies compliance with social issues to abide, respect and adhere to the company moral and ethical values in the management of the company concerning Human Rights, working conditions, forced labour and environmental issues.

Supplier and Contractor Due Diligence

LVUK ensures that LV Group new suppliers are carefully chosen and that, prior to entering into any new contractual relationship with a supplier or contractor, suppliers and contractors are complying with the LV Suppliers’ Code of Conduct.

LVUK reserves the right to check adherence of LV Group and its suppliers and contractors to the principles set out in the LV Suppliers’ Code of Conduct and to conduct compliance audits at any time. Upon reasonable request, LVUK makes sure that LV Group, and its suppliers and contractors shall supply the necessary information and grant access to LVUK representatives to verify compliance with the requirements of the LV Suppliers’ Code of Conduct. Suppliers and contractors shall further keep proper records to prove compliance with the LV Suppliers’ Code of Conduct and provide access to complete, original, and accurate files to LVUK representatives.

LV Group suppliers and contractors may be required to improve and correct any deficiency discovered during any such audits.
LVUK shall use its reasonable endeavours to ensure that all LV Group supplier and contractor template contracts contain clauses requiring LV Group suppliers and contractors to adopt similar anti-modern slavery standards and practices.

Staff / Employees

- 1. Training and Awareness

LVUK conducts regular training for its employees to ensure compliance with legal requirements across LVUK. The training enables LVUK to reduce business risk of non-compliance through efficient processes and reliable data and reporting. All documentation, policies and updates are provided for easy access via the employee portal for all employees.

It is mandatory for all LVUK employees to familiarise themselves with this statement. It forms part of the induction training process for new employees and is available in English. LVUK’s aim is to eliminate any risk of Modern Slavery in its business operations and in its supply chains.

- 2. Employees’ Code of Conduct

LV Group’s Employees Code of Conduct demonstrates LV Group’s ambition for its staff to act with, and commit to, integrity in the conduct of its business in an environment that is free from all form of unethical behaviour including forced or compulsory labour, child labour, discrimination, corruption and harassment and therefore provides a common framework of values and principles to provide guidelines to its staff.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes LV UK’s slavery and human trafficking statement for the financial year ending 31 December 2017.

The Board of Directors of LVUK has approved this statement and it has been duly signed by the following director:

Alessandro Valenti
Director
Louis Vuitton UK Limited

Date: June 29th, 2018
Anti-Modern Slavery Policy

1. Introduction

Modern slavery is a crime resulting in an abhorrent abuse of human rights. The term ‘modern slavery’ is used to encapsulate the crimes of Slavery, Servitude, forced or compulsory labour and Human Trafficking. Helpful definitions of these terms are included below.

2. Definitions

Slavery - the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ownership of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person.

Servitude - the obligation to provide services that is imposed by the use of coercion and includes the obligation of a ‘servf’ to live on another person’s property and the impossibility of changing his or her condition.

Human trafficking - requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel.

3. Our approach

3.1 We operate a zero-tolerance approach to modern slavery and are committed to being transparent in our efforts to ensure modern slavery is not taking place in our business or supply chains.

3.2 We require the same standards from our business partners, including suppliers, and will communicate and reinforce our zero-tolerance approach to modern slavery to them throughout our relationship. As part of our contracting processes, we include prohibitions against the use of modern slavery. We also require our business partners will hold their suppliers to the same standards.
3.3 This policy applies to all persons working for us or on our behalf in any capacity.

3.4 This policy does not form part of any of our employees’ contract of employment.

3.5 We encourage openness about modern slavery issues and will support any employee, worker, supplier, contractor or sub-contractor who raises genuine concerns under this policy in good faith - even if they eventually turn out to be mistaken.

4. Responsibilities

4.1 Our board is responsible for ensuring this policy:

4.1.1 complies with our ethical and legal requirements; and

4.1.2 is complied with by all relevant parties.

4.2 Day-to-day responsibility for implementing this policy and monitoring its effectiveness lies with the Managing Director, Louis Vuitton UK Limited, Gridiron Building 5th Floor, 1 Pancras Square, London, N1C 4AG (tel: 00 44 207 399 400) - who will also deal with any queries and/or feedback relating to modern slavery compliance.

4.3 All managers must ensure those employees reporting to them understand and comply with this policy and receive appropriate training on it. Training on this policy and the risk of modern slavery forms part of the induction training programme for all employees who work for us and regular follow up training will be provided as appropriate.

4.4 You shall be happy that you have read, understood and comply with this policy. You must avoid any activity which might lead to, or indicate, a breach of this policy. If any employee breaches this policy, he/she may face disciplinary action. If any other individuals/organisations who work on our behalf breach this policy, we may require said individuals / organisations to improve their compliance with this policy or we may terminate our relationship with them.

5. Your role

5.1 If you believe or suspect a breach of this policy has occurred or that it may occur, raise it with your line manager.

5.2 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager.

Policy date: June 29, 2018