Louis Vuitton UK Limited

UK Modern Slavery Act 2015 - Statement for Financial Year ending 31 December 2020

Introduction

The COVID-19 pandemic placed significant pressure on UK businesses, and was an unprecedented “stress test” on many corporations and institutions.

Broadly speaking, the COVID-19 pandemic heightened existing vulnerabilities, unearthed latent risks, and created new challenges in supply chains globally.

During this period, and despite the turmoil of the pandemic, Louis Vuitton UK Limited (“LVUK”) never wavered in its struggle against the risks of modern slavery and human trafficking occurring in our business or supply chains.

In particular, attention was paid to ensure that the significant, necessary and key responses, that LV UK has had to undertake in this extraordinary context, did not divert it away from social issues in the short term which needed thorough monitoring in these difficult times.

Consistent with the latest guidelines issued by the UK government in response to the COVID-19 pandemic, LV UK took significant action to protect the health, safety and integrity of their workers, and considered how fluctuations in demand and changes in this extraordinary context may have brought new or increased risks within the various actors of its supply chain, in order to manage them in the most appropriate way.

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.

For several years now, 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.

In the specific COVID-19 context, some businesses saw an increase in demand for certain products or services, which in turn required additional recruitment and new or expanded supply chains. Time was often of the essence.

For example, as a large retail business actor, LV UK has engaged new supply chains in order to comply with new government regulations or industry-body recommendations related to COVID-19, such as the ordering and installation of plexiglass dividers. As with all other supply chains, LV UK has maintained close contact and rigorous checks on their supply chains in spite of the time pressure to comply to protect our workforce and the public.

Notwithstanding the challenge of the pandemic, LV UK continued its efforts to uphold its ethical standards within all of its activities, in particular through its LV's Code of Conduct for landlords.

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.

LV UK promoted good business practices during the pandemic, including by maintaining open lines of communication with suppliers and taking care to avoid delaying payment owed or renegotiating contracts on unreasonable terms during this very challenging period. LV UK envisage that the measures help its
commercial partners to conduct themselves ethically further reducing the risk of modern slavery in their organisation or supply chains.

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. Dealing with lockdown, social distancing and isolation in the COVID-19 context.

In addition to its continuing efforts to provide training for its employees (see below), LV UK reinforced and promoted their Employee Assistance Programme as well as accommodating individual situations to allow the retail population (Store Managers, Team Managers who are parents) to work from home and get the appropriate support, thus limiting the sense of insecurity or of being in a vulnerable position.

2. Training and Awareness

Despite the pandemic, LVUK continued to conduct 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.
3. Employees’ Code of Conduct - Whistleblowing Policy/Internal Alert System

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 modern slavery, child labour, discrimination, corruption and harassment and therefore provides a common framework of values and principles to provide guidelines to its staff.

In the specific context of the COVID 19 pandemic, all employees continued to benefit from the whistleblowing alert system operated by an independent third party organisation, so that they can raise concerns about practices within the business or the supply chain.

Providing training on the Employees Code of Conduct and whistleblowing policy were included in the onboarding process and package to sign.

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 2020.

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

[Signature]

Amandine ROHMER
Director - Louis Vuitton UK Limited

Date: 28 June 2021