



Corporate Human Rights Benchmark 2023 Company Scorecard

Company name	LVMH Moet Hennessy - Louis Vuitton
Sector	Apparel (supply chain and own operations)
Overall score	15.4 out of 100
Sector	Apparel (supply chain and own operations)

Theme score	Out of	For theme
3.1	10	A. Governance and Policy Commitments
5.5	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
3.4	25	D. Performance: Company Human Rights Practices
0.0	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Universal Declaration of Human rights (UDHR): LVMH's Code of Conduct declares: 'LVMH respects and promotes the Universal Declaration of Human Rights and adheres to the principles of the United Nations Global Compact, as well as to the United Nations Guidelines on Women's Empowerment. Within its sphere of influence, LVMH supports the values, freedoms and fundamental rights promoted in these texts.' [Code of Conduct, 2017: <u>r.lvmh-static.com</u>] Score 2 • Not Met: Commitment to UNGPs • Not Met: Commitment to OECD MNE Guidelines: The Company's Code of Conduct states: 'This Code of Conduct is inspired by the fundamental values detailed above, as well as the [] OECD Guidelines for Multinational Enterprises'. However, 'inspired by' is not considered a formal statement of commitment according to CHRB wording criteria. [Code of Conduct, 2017: <u>r.lvmh-static.com</u>]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to ILO core principles: The Company's Code of Conduct states: 'LVMH respects and promotes the principles of the United Nations Global Compact, in particular the fundamental rights at work: elimination of discrimination with respect to employment and occupation; elimination of all forms of forced and compulsory labor; effective abolition of child labor; freedom of association and the effective recognition of the right to collective bargaining.' [Code of Conduct, 2017: <u>r.lvmh-static.com</u>]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			 Met: Explicitly lists all four ILO core principles: See above, the Company explicitly commits to respect each ILO core principle. [Code of Conduct, 2017: r.lvmh-static.com] Score 2 Met: Expects suppliers to commit to ILO core principles: The Company's Suppliers Code of Conduct declares: 'the LVMH Group works with Suppliers which agree to comply with the requirements of this Code and with the principles stipulated in the Conventions of the International Labour Organization, [] and agree to ensure that their own suppliers do the same in the conduct of their activities for the LVMH Group.' [Supplier Code of Conduct, 04/2022: r.lvmh-static.com] Met: Explicitly lists all four ILO core principles for suppliers: The Company's Suppliers Code of Conduct sets the following 'Labor standards and social responsibilities': 'prohibition of child labor', 'prohibition of forced labor and human trafficking', 'prohibition of discrimination', and 'freedom of association'. About the latter, the Company states: 'the LVMH Group requires its Suppliers to respect and recognize the right of workers to negotiate collectively, and to create or join labor organizations of their choice without any sanction, discrimination, or harassment. When applicable, Suppliers must provide workers' representatives with appropriate means to exercise their rights. Intimidation, threats, or discriminatory practices against workers' representatives are prohibited.' [Supplier Code of
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	Conduct, 04/2022: <u>r_lvmh-static.com</u>] The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to respect H&S of workers: The Company's Code of Conduct states: 'LVMH takes measures to ensure the health and safety of its employees and ensures that all its activities comply with applicable workplace health and safety laws and regulations in all its host countries. LVMH is committed to implementing best practices in the area of workplace safety. It works towards protecting employees in the framework of their professional activities from exposure to hazardous materials or situations and reporting potential hazards.' [Code of Conduct, 2017: <u>r_lvmh-static.com</u>] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week Score 2 • Met: Expects suppliers to commit to H&S of workers: The Company's Suppliers Code of Conduct states: 'In line with the LVMH Health & Safety Policy, Suppliers are expected to provide their workers with a safe and healthy workplace environment in order to avoid accidents, bodily injuries, or dangerous expositions which may be caused by, related to, or result from their work, including during the operation of equipment, of chemical products, or during work-related travel []'. [Supplier Code of Conduct, 04/2022: <u>r_lvmh-static.com</u>] • Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Company's Suppliers Code of Conduct states: 'suppliers must comply with all local laws and regulations applicable with respect to working hours, which shall not, in any case, exceed the maximum set by internationally recognized standards such as the International Labour Organization. Suppliers cannot impose excessive overtime hours. The total number of hours worked per week including overtime cannot exceed legal limits. Workers are entitled to at least the minimum number of days off established by applicable laws and at minimum must have at least one day off in every seven
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	2	Conduct, 04/2022: r.lvmh-static.com] The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to women's rights: The Company's Code of Conduct discloses: 'LVMH respects and promotes the Universal Declaration of Human Rights and adheres to the principles of the United Nations Global Compact, as well as to the United Nations Guidelines on Women's Empowerment.' [Code of Conduct, 2017: r.lvmh-static.com] • Met: Expects suppliers to respect these rights: The Company's Suppliers Code of Conduct states: 'the LVMH Group works with Suppliers which agree to comply with the requirements of this Code and with the principles stipulated in [] United Nations Women's Empowerment Principles and agree to ensure that their own

Indicator Code	Indicator name	Score (out of 2)	Explanation
			 suppliers do the same in the conduct of their activities for the LVMH Group.' [Supplier Code of Conduct, 04/2022: r.lvmh-static.com] Score 2 Met: Commitment refers to CEDAW/Women's Empowerment Principles: See above. Met: Expects suppliers to respect these rights: See above.
A.1.4	Commitment to remedy	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to remedy adverse HRs impacts: The Company's Code of Conduct states: in the context of 'respecting and supporting human rights and fundamental freedoms', the code states that 'LVMH is committed to remaining vigilant in identifying any potential direct or indirect negative impact of its activities on society in order to prevent, or if necessary, remedy any such negative impact'. [Code of Conduct, 2017: r.lvmh-static.com] • Not Met: Expects suppliers to make this commitment Score 2 • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with suppliers on remedy
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects suppliers to make this commitment Score 2 • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board level responsibility for HRs: The Rules of Procedure of the Ethics and Sustainable Development Committee discloses: 'the duties of the Committee are to: assist the Board of Directors in defining the Company's and the Group's broad strategic direction with regard to workforce-related, environmental and climate- related matters, and ensure that it is put into practice; review the ethical, environmental, workforce-related and social responsibility issues faced by the Group [] Ensure compliance with the rules and values laid down in the LVMH Code of Conduct as well as other codes and charters resulting from that Code (including but not limited to LVMH's Supplier Code of Conduct and Environmental Charter) [] monitor the functioning of whistleblowing systems put in place within the Group.' [Rules of Procedure of the Ethics and Sustainable Development Comittee, 26/01/2023: r.lvmh-static.com] • Not Met: Describes HRs expertise of Board member Score 2 • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Process to review HRs strategy at board level • Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: At least one board member incentive linked to HRs commitments: The Company's 2022 Universal Registration Document discloses: 'compensation paid to the Chairman and Chief Executive Officer and the Group Managing Director also includes a variable annual component based on the achievement of quantifiable and qualitative targets. For the Chairman and Chief Executive Officer, these quantifiable and qualitative targets are weighted at 60% and 40%, respectively, for the purposes of determining variable compensation; for the Group Managing Director, they are weighted two-thirds and one-third, respectively [] The qualitative criteria concern strategy, management, and corporate social responsibility and sustainable development, weighted as follows: 50%, 25% and 25% for the Chairman and Chief Executive Officer; and 25%, 50% and 25% for the Group Managing Director. Specific qualitative criteria have been set, but their

Indicator Code	Indicator name	Score (out of 2)	Explanation
			 details are not made public for confidentiality reasons'. No further details found. [2022 Universal Registration Document, 03/2023: r.lvmh-static.com] Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 Not Met: Performance criteria linked to HRs made public Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of 1 on A.1.2.a • Met: Senior responsibility for HRs implementation and decision making: The Company's latest Social Responsibility Report discloses: 'Chantal Gaemperle, Group Executive Vice President, Human Resources & Synergies, and member of the Executive Committee, oversees the Group's social responsibility. [2021 Social and Environmental Responsibility Report, 04/2022: r.lvmh-static.com] Score 2 • Met: Describes day-to-day responsibility for implementing HRs commitments: The report also states that 'created in 2017, the Ethics & Compliance Department steers and coordinates the Group's procedures in the fight against corruption, in personal data protection, and in compliance with international sanctions, human rights, and anti-money laundering laws'. In addition: 'each Maison has its own CSR correspondent appointed by the HR Department who prepares CSR reports and liaises with LVMH to ensure that all initiatives are in line with the Group strategy.' [2021 Social and Environmental Responsibility Report, 04/2022: r.lvmh-static.com] • Met: Day-to-day resources and expertise allocation in own operations: The Company's Social Responsibility Report also shares: 'Within each Maison, a reporter collects and reports workforce-related data, a controller checks and validates its accuracy, and the Maison's Human Resources Director provides final sign off. In addition, the Corporate Social Responsibility Department reports on qualitative aspects, listing progress made under the policies adopted and action plans put in place by the Maisons. LVMH uses these consolidated reports to steer and communicate about its social responsibility policies and initiatives'. [2021 Social and Environmental Responsibility Report, 04/2022: r.lvmh-static.com] • Not Met: Resources and expertise allocation in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Senior manager incentives linked to HRs commitments: The Company's 2022 Universal Registration Document discloses: 'compensation paid to [] the Group Managing Director also includes a variable annual component based on the achievement of quantifiable and qualitative targets. For the Chairman and Chief Executive Officer, these quantifiable and qualitative targets are weighted at 60% and 40%, respectively, for the purposes of determining variable compensation; for the Group Managing Director, they are weighted two-thirds and one-third, respectively [] The qualitative criteria concern strategy, management, and corporate social responsibility and sustainable development, weighted as follows: 50%, 25% and 25% for the Chairman and Chief Executive Officer; and 25%, 50% and 25% for the Group Managing Director. Specific qualitative criteria have been set, but their details are not made public for confidentiality reasons'. No further details found. [2022 Universal Registration Document, 03/2023: r.lvmh-static.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies

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B.1.3	Integration with enterprise risk management	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: HRs risks integrated as part of enterprise risk system: LVMH's 2022 URD discloses: 'the general risk analysis exercise [] helps the Maisons identify which countries and types of purchases are particularly at risk with respect to human rights violations and environmental impact. This exercise is now one of the key components of the Group's Convergence program.' [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] • Not Met: Provides an example Score 2 • Not Met: Risk assesment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: LVMH's Code of Conduct 'is available on the LVMH website and is also available and can be downloaded in several languages on the Group's intranet. This Code of Conduct is given to all new employees'. In regard to this the Company's 2022 URD discloses: 'the Group's Ethics & Compliance department shares a range of documents (summary reports, examples of best practice, awareness videos, guides, etc.) with its network of Ethics & Compliance Officers via a dedicated Ethics & Compliance Intranet, a new version of which is due to go live in 2023. The Code of Conduct is published on the Group's website and is communicated to employees, notably when they first join the Group. An onboarding module entitled "Our shared ethical framework" was gradually rolled out within the Maisons starting in 2022 with the aim of allowing new joiners to familiarize themselves with the Code of Conduct, the accompanying internal guidelines and the Group's whistleblowing system. Available in 10 languages, this module makes it possible monitor employees' familiarization with these documents'. However, it is not clear how the Company's human rights commitments (contained in the code) are actively communicated to all workforce, beyond new employees. [Code of Conduct, 2017: r.lvmh-static.com] & [2022 Universal Registration Document, 03/2023: r.lvmh-static.com] Score 2 • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Requires suppliers to communicate HRs policies: LVMH's Supplier Code of Conduct affirms: 'the LVMH Group, therefore, requires its Suppliers to respect the principles set forth in this Supplier Code of Conduct ("Code") and to ensure that their own suppliers do the same in the conduct of their activities for the LVMH Group [] The LVMH Group works with Suppliers which agree to comply with the requirements of this Code and with the principles stipulated in the Conventions of the International Labour Organization, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Women's Empowerment Principles and agree to ensure that their own suppliers do the same in the conduct of their activities for the LVMH Group'. The CSR report states that 'The Company's Social Responsibility Report states: 'each Maison in the Group calls on their suppliers to uphold the ethical principles set out in the Supplier Code of Conduct and to ensure that their own suppliers and sub-contractors also comply with these same requirements'. [Supplier Code of Conduct, 04/2022: r.lvmh-static.com] Score 2 • Not Met: Describes how HRs policies are contractual/binding for suppliers: The Company's 2022 Annual Report states: 'The Group considers it very important that its Maisons and their partners (suppliers, distributors, subcontractors, etc.) abide by a shared set of rules, practices and principles with regard to business conduct and ethics, corporate social responsibility and environmental protection, which is why LVMH requires its partners to adhere to the principles set out in the Group's Supplier Code of Conduct'. However, no evidence found on whether this is reflected in contractual or other binding agreements. [LVMH 2022 Annual Report, 03/2023: r.lvmh-static.com] • Not Met: Requires suppliers to cascade contractual/binding HRs policies to it

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			declares: 'LVMH requires suppliers to comply with the ethical principles set out in the Supplier Code of Conduct. This Code specifies requirements to be respected by its suppliers, including any subcontractors they employ, in the management of their business regarding social issues (prohibition of forced labor and child labor, harassment and discrimination, measures related to wages, working hours, the free exercise of union rights, health and safety), environmental issues and operational issues [] and measures to fight corruption and illicit influence'. It is not clear, however, whether suppliers are required to cascade down contractual requirements to comply with the Code or how they are expected to be held accountable for their suppliers performance (i.e. how suppliers are required to monitor compliance on their own supply chain). [2021 Social and Environmental Responsibility Report, 04/2022: <u>r.lvmh-static.com</u>] & [Code of Conduct, 2017: <u>r.lvmh-static.com</u>]
B.1.5	Training on Human Rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The Company's 2022 URD discloses: 'an onboarding module entitled "Our shared ethical framework" was gradually rolled out within the Maisons starting in 2022 with the aim of allowing new joiners to familiarize themselves with the Code of Conduct, the accompanying internal guidelines and the Group's whistleblowing system'. However, no further details found including human rights training for the workforce generally, beyond the 'onboarding module', which is assumed to be implemented with new employees. [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] • Met: Trains relevant managers including procurement on HRs: LVMH's latest social Responsibile purchasing courses that take place within the Maisons, as well as a Group-wide responsible purchasing course that will be rolled out in 2022.' Additionally, the Company's 2022 URD provides the following example: 'in October 2021, seven Maisons (Berluti, Fendi, Givenchy, Loro Piana, Louis Vuitton, Acqua di Parma and Bulgari) came together to implement an online training course for 25 site managers working for suppliers in Italy. In December, 10 Maisons (Moët Hennessy, Berluti, Celine, Fendi, Givenchy, Loewe, Louis Vuitton, Bulgari, Parfums Christian Dior and Sephora) did the same for 65 site managers working for suppliers in China. The courses covered human rights, health and safety, the environment and anti-corruption.' [2021 Social and Environmental Responsibility Report, 04/2022: <u>r.lvmh-static.com</u>] & [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] • Not Met: Meets both requirements under score 1 • Not Met: Meets both requirements adupt environmental, workforce- related and
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of at least 1 on A.1.2.a • Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The 2022 URD states that 'the Corporate Social Responsibility Department reports on qualitative aspects of workforce management and development in order to monitor the implementation of the Group's CSR targets, listing progress made under the policies adopted and action plans put in place by the Maisons'. The document also shares that 'the Group coordinates the actions of its Maisons in order to prevent any human rights violations that may occur within the framework of their operations or those of their suppliers and subcontractors'. In addition, the Supplier Code of Conduct states: 'each of the entities within the LVMH Group reserves the right to control compliance with the principles set forth in this Code by Suppliers. These controls will be performed by such entities of the LVMH Group or duly mandated third parties. Any control or audit will be related to the business relationship between the relevant entity within the LVMH Group and the Supplier. If a Supplier is subject to specific professional obligations pursuant to law, any control or audit will be carried out taking into consideration these professional obligations. Suppliers must commit to improving or correcting any

Indicator Code	Indicator name	Score (out of 2)	Explanation
			deficiencies identified. The entities of the LVMH Group may also support Suppliers in implementing and applying best practices in order to resolve non-conformity issues'. See below further details. [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] & [Supplier Code of Conduct, 04/2022: <u>r.lvmh-static.com</u>] • Not Met: Discloses % of supply chain monitored: The Group uses specialist independent firms to conduct these audits. In 2022, 1,625 audits (not including EcoVadis assessments) were undertaken at 1,384 suppliers and subcontractors. Thanks to an improvement in the health situation in the countries where production facilities are located, this figure was higher than in 2021, when 1,512 audits were carried out'. Although the Company breaks down figures on suppliers and audits per world region, It is not clear, however, the percentage of the supply chain monitored. [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] • Not Met: Describes how workers are involved in monitoring Score 2 • Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process: The Company states that 'Maisons maintain collaborative, active working relationships with direct suppliers by helping them conduct audits and draw up any corrective action plans that might be required'. the supplier code also states that 'suppliers must commit to improving or correcting any deficiencies identified. The entities of the LVMH Group may also support Suppliers in implementing and applying best practices in order to resolve non-conformity issues'. No details were found, however, on the actual corrective action process. [2022 Universal Registration Document, 03/2023: <u>r.lvmh- static.com</u>] • Not Met: Discloses findings and number of correction action processes: The Company indicates that 'In 2022, 7% of suppliers audited failed to meet the Group's requirements based on a four-tire performance scale that takes into account the number and severity of critical compliance failures. In majority of compliance failures
B.1.7	Engaging and terminating business relationships	1	 implemented. [2022 Universal Registration Document, 03/2023: r.lvmh-static.com] The individual elements of the assessment are met or not as follows: Score 1 Met: HRs performance affects selection suppliers: The Social Responsibility report discloses: 'as part of the listing process, suppliers first and foremost undergo a comprehensive in-depth assessment. As is the case with Loewe, the Maisons, the Maisons send potential suppliers iclaims, and increasingly often, direct suppliers (level 1 and over) also see their sub-contractors audited so as to ensure they comply with the requirements of the Supplier Code of Conduct. The vast majority of audits cover HR considerations (such as health and safety, working conditions, child labor, decent wages, working hours, discrimination, freedom of association, the right to strike and anti-corruption)'. [2021 Social and Environmental Responsibility Report, 04/2022: r.lvmh-static.com] Met: HRs performance affects continuation supplier relationships: The Supplier Code of Conduct affirms: 'in the event of non-conformity with this Code by a Supplier, each of the entity(ies) within the LVMH Group which has a business relationship with such Supplier reserves the right to require correction of the violations, suspend purchase, refuse to take delivery under any purchase order and return any goods from the Supplier until the non-conformities have been corrected, and may terminate its business relationship with the Supplier, in addition to any other rights or remedies available to such entity(ies) within the LVMH Group.' [Supplier, in addition to any other rights or meredies available to such entity(ies) within the LVMH Group.' [Supplier Code of Conduct, 04/2022: r.lvmh-static.com] Score 2 Not Met: Describes positive HRs incentives for business relationships Not Met: Works with suppliers to meet HRs requirements: The Company's 2022 Annual Report states: 'supporting our partners is a key strategic priori

Indicator Code	Indicator name	Score (out of 2)	Explanation
			providing training on issues specific to their own activities. LVMH and its Maisons work with them as part of a collaborative approach, offering support through audits and, where necessary, action plans'. However, no details found on how the Company proactively works with them to help improve their performance beyond compliance monitoring. [LVMH 2022 Annual Report, 03/2023: r.lvmh-static.com]
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes how workers and communities identified and engaged in the last two years • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders: The Company indicates that 'Some Maisons have supplemented their audits using measures to directly ask their suppliers' employees about their working conditions. These surveys help gain a clearer vision of working conditions at the sites concerned and check for problems such as forced labor or harassment, which may not be detected during audits. These fully anonymous, confidential surveys are offered through a mobile instant messaging application'. No evidence found of additional example. [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] Score 2 • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes process of identifying risks in own operations: The 2022 URD shares: 'analysis of gross risks was carried out in 2020. This analysis is based on comparing external risk indicators (supplied by Verisk Maplecroft) with quantitative information provided by the Group's Maisons (location, number of employees, volume of purchases, types of suppliers, etc.). This data enables each Maison to map its gross risks in terms of human rights and the environment in order to prioritize its risk control measures. Purchasing data was updated in 2022.' [2022 Universal Registration Document, 03/2023: r.lvmh-static.com] • Met: Describes process for identifying risks in business relationships: The Company's latest Social Responsibility Report states: 'as part of the comprehensive supplier risk assessment process, the Group put in place a Convergence program, which covers three main courses of action. The first involves identifying and mapping the most serious risks, with help from Verisk Maplecroft, a leading research firm specializing in global risk analytics'. [2021 Social and Environmental Responsibility Report, 04/2022: r.lvmh-static.com] Score 2 • Not Met: Describes global risk identification system incl. stakeholder consultation: As indicated above, the Company consults with Verisk maplecroft and conducted last process in 2020. No further details found, however, in relation to whether it consults with affected stakeholders as part of the due diligence process for identifying potential human rights risks and impacts. • Not Met: Describes risks identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes assessment process and discloses salient HRs risks • Met: Describes how process applies to supply chain: The 2022 URD states: 'as part of the comprehensive supplier risk assessment process, the Group put in place a Convergence program, which covers three main courses of action. The first involves identifying and mapping the most serious risks, with help from Verisk Maplecroft, a leading research firm specializing in global risk analytics. A variety of factors and indicators beyond the standard risk levels are assessed through an approach that is broken down by both geographic region and business segment. These findings are cross-referenced with the quantitative data provided by the Maisons. Then, suppliers are ranked by criticality level, which serves to measure the potential risk across the Group's supply chain. The second course of action requires suppliers identified as high risk to be assessed using the EcoVadis methodology.' [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] • Not Met: Public disclosure of results of HRs risk assessment Score 2 • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			 Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company indicates its 'Risk mitigation and prevention measures' for human rights, however, it does not describe the system for this process. [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] • Not Met: Describes how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HRs issue Score 2 • Not Met: Meets all requirements under score 1
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	 Not Met: Describes how stakeholders involved in decisions about actions taken The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes system for evaluation effectiveness of actions: LVMH's 2021 Social Responsibility Report discloses: 'in order to ensure the ethics and compliance measures in place remain suitable and effective, the LVMH Group has put in place a series of checks that are appropriate and proportionate to the risks facing the Group. Should these measures be found insufficient or incomplete, corrective actions are put in place.' However, no evidence of those 'series of checks' applied to the mitigation/prevention measures put in place to response to human rights risks and impacts was found. [2021 Social and Environmental Responsibility Report, 04/2022: r.lvmh-static.com] Not Met: Example of lessons learned from evaluation effectiveness of actions Score 2 Not Met: Meets all requirements under score 1 Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all workers: The Code of Conduct indicates that 'LVMH Group has established an internal alert procedure enabling reporting and processing of alerts raised by employees regarding violations or risks of violation of the measures set out in this code of conduct. This alert procedure is available to all employees'. [Code of Conduct, 2017: <u>r.lvmh-static.com</u>] Score 2 • Met: Grievance mechanism available in appropriate languages and workers made aware: The Company's 2022 URD states: 'LVMH has set up the "LVMH Alert Line", a secure centralized whistleblowing system that guarantees confidentiality, available in 14 languages. This online platform, which can be accessed from the Group's website [] new employees are given specific information about this whistleblowing system on joining, and then receive regular updates at the Maisons and the Group's entities. Employees are informed in particular about how they can access the system and the fact that the Group strictly prohibits any retaliation against whistleblowers using the system in good faith.' [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] • Met: Describes how workers in supply chain access grievance mechanism: Supplier Code of Conduct states: 'suppliers must establish processes or mechanisms by which workers and stakeholders can raise issues of concern without fear of retaliation or negative impact.' [Supplier Code of Conduct, 04/2022: <u>r.lvmh-static.com</u>] • Met: Expects suppliers to convey expectation to their suppliers: The supplier code also covers indirect suppliers [Supplier Code of Conduct, 04/2022: <u>r.lvmh-</u> static.com]
C.2	Grievance mechanism(s) for external individuals and communities	0.5	 The individual elements of the assessment are met or not as follows: Score 1 Not Met: Grievance mechanism accessible to all external individuals and communities: The Company states that 'LVMH has set up an Alert Line (alertline.lvmh.com) allowing all its stakeholders, both internal and external, to report any breach of the Group's Code of Conduct, directives, principles, internal

Indicator Code	Indicator name	Score (out of 2)	Explanation
			 policies or applicable laws and regulations, anywhere in the world. 100% of employees, suppliers and customers can access the Alert Line, wherever they may be in the world.' However, it is not clear whether external individuals or communities that are not suppliers and customers can access the mechanism. [2022 Social and Environmental Responsibility Report, 06/2023: <u>r.lvmh-static.com</u>] Score 2 Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: Even though the Company states that its LVMH Alert Line is available in different languages, it is not clear how the Company ensures the awareness of grievance mechanisms among its affected external stakeholders. Met: Describes how external individuals/communities access grievance mechanism: Supplier Code of Conduct states: 'suppliers must establish processes or mechanisms by which workers and stakeholders can raise issues of concern without fear of retaliation or negative impact.' [Supplier Code of Conduct, 04/2022: <u>r.lvmh-static.com</u>] Met: Expects supplier to convey expectation to their suppliers: The supplier code is also required for indirect suppliers [Supplier Code of Conduct, 04/2022: <u>r.lvmh-static.com</u>]
C.3	Users are involved in the design and performance of the mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance Score 2 • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0.5	 Not Met: Provides user engagement examples (at least two) on improvement The individual elements of the assessment are met or not as follows: Score 1 Met: Describes procedure and timescales for managing complaints or concerns: The LVMH's Alert Policy discloses the 'Key steps of the reporting process': [1.] Submission of the Report, []; [2] 'Acknowledgement of receipt: in seven working days of the submission of the Report if the complaint was raised through local reporting channels; [3] Assignment of the Report, while describing this step, []: [4] Assessment of admissibility of the Report[]; [5.] Investigation process, and [6.] Closing of the E&C Alert- investigation report and follow-up actions. The Policy also states: If means of contact have been provided, the author of the Report, will: be provided with regular feedback on the progress of the processing of the Report, to the extent possible; be provided in writing, within a reasonable timeframe not exceeding three (3) months from the acknowledgment of receipt, with information regarding the measure that were taken or that are contemplated in order to evaluate the accuracy of the allegations or, if applicable, regarding the measures taken t remedy the reported facts (and the reasons for these measures); and be informed of the outcome of the evaluation of the E&C Alert once the investigation is concluded, and of the closure of the E&C Alert. [LVMH Group Alert Policy, 21/02/2023: r.lvmh-static.com] Not Met: Describe types of outcome to complainant through use of mechanism Not Met: Describe secalation to senior levels / independent adjudicators
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Public statement prohibiting retaliation against workers/stakeholders: LVMH's Code of Conduct declares: 'retaliations are prohibited against people who use this procedure in good faith even when the suspicions at the origin of the alert prove groundless.' In addition, the Group Alert Policy states that 'the LVMH Group is committed to taking all adequate measures to protect the author of the Report, as well as any person who assisted the author of the Report. Under no circumstances may the author of the Report's identity be disclosed to anyone unless with the author of the Report's express agreement [], any obstacle to the exercise of their right to Report may lead to disciplinary or legal action in accordance with applicable laws, the LMVH Group ensures that no disciplinary action or Retaliation is taken against the author of the Report made in good faith, even if the reported facts subsequently prove o be inaccurate or unfounded or do not give rise to any proceedings or penalties.' However, it is not clear if this applies to external stakeholders. [Code of Conduct, 2017: r.lvmh-static.com] & [LVMH Group Alert Policy, 21/02/2023: r.lvmh-static.com] • Met: Describes practical measures to prevent retaliation: See above. The Group Alert Policy states: 'the LVMH Group is committed to taking all adequate measures

Indicator Code	Indicator name	Score (out of 2)	Explanation
			to ensure the integrity and confidentiality of E&C Alerts, at all stages of the evaluation process, with respect of the identity of the author of the Report, the identity of the person(s) targeted by the E&C Alert, the identity of the person(s) mentioned in the E&C Alert, and the facts that were reported and information was gathered during the evaluation process. Any person having access to such information is bound by an obligation of confidentiality. Any breach of this confidentiality obligation may lead to disciplinary or legal sanctions in accordance with applicable laws'. As indicated in C.1 workers are informed about how the mechanism works. [LVMH Group Alert Policy, 21/02/2023: r.lvmh-static.com] Score 2 • Not Met: Specifies no legal action, firing or violence • Met: Expects suppliers to prohibit retaliation against workers/stakeholders: Supplier Code of Conduct states: 'suppliers must establish processes or mechanisms by which workers and stakeholders can raise issues of concern without fear of retaliation or negative impact.' [Supplier Code of Conduct, 04/2022: r.lvmh-static.com]
C.6	Company involvement with state- based judicial and non- judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions Score 2 • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified Score 2 • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2022 URD discloses that 'in 2022, 327 reports were received through the Group's whistleblowing system, of which 65% had to do with human resources matters. Of these 327 reports, 202 were submitted anonymously. These reports are handled in accordance with the applicable law and result in an inquiry if applicable'. Not clear however, the total amount of complaints related to human rights (not clear the coverage of 'human resources') and the outcome of the complaints. [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] • Not Met: Example of how lessons from mechanism improved HRs management system: The 2022 URD states that 'once alerts have been handled, they can be used to help improve risk identification and prevention procedures, as part of a continuous improvement approach.' However, no examples were found. [2022 Universal Registration Document, 03/2023: <u>r.lvmh-static.com</u>] Score 2 • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Decribes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.a	Living wage (in		The individual elements of the assessment are met or not as follows:
	own production		Score 1
	or		• Not Met: Pays living wage or sets time-bound target: The 2022 URD states: 'in
	manufacturing		2021, LVMH set up a team to develop a fair wage policy applicable to all its
	-		employees and suppliers. In 2022, the Human Resources Department adopted the
	operations)		fair wage principles established with the support of the Fair Wage Network's
			expertise. The Group's Maisons were all asked to verify that these principles had
		0	been implemented, and the network of Human Resources, Compensation &
		0	Employee Benefits and CSR Officers is responsible for their coordination.
			Nevertheless, no definition of 'Fair Wage' was found, nor a time-bound target to
			pay all workers a living wage. [2022 Universal Registration Document, 03/2023:
			r.lvmh-static.com
			 Not Met: Describes how living wage determined
			Score 2
			 Not Met: Achieved paying a living wage
			Not Met: Reviews definition living wage with unions
D.2.1.b	Living wage (in		The individual elements of the assessment are met or not as follows:
	the supply		Score 1
	chain)		• Not Met: Requirements on living wage in supplier codes and contracts: The
	,		supplier code states that 'If there is no legal minimum wage or rate for overtime
			pay in the country concerned, Suppliers must ensure that the wages are at least
			equal to the average minimum in the relevant industrial sector and that overtime
			pay is at least the same as the usual hourly compensation. Wages must be
			sufficient to meet the workers' basic needs and provide some discretionary
			income. Wage deductions shall not be used as a disciplinary measure. [] The
		0	LVMH Group requires its Suppliers to guarantee that all workers receive benefits
			stipulated by applicable law or in any applicable collective bargaining agreements,
			company agreements, and other applicable negotiated individual or collective
			agreements'. However, no evidence found of a requirement to pay a living wage,
			which, in addition to what it's mentioned above, also should cover for
			family/dependents. [Supplier Code of Conduct, 04/2022: <u>r.lvmh-static.com</u>]
			Not Met: Describes work with suppliers on living wage
			Score 2
			Not Met: Assessment of scope of payment below living wage in supply chain
			Not Met: Analysis of trends demonstrating progress
D.2.2	Aligning		The individual elements of the assessment are met or not as follows:
	purchasing		Score 1
	decisions with human rights		Not Met: Describes practices to avoid price or short notice requirements that
			undermine HRs: The Company's Code of Conduct affirms that 'LVMH maintains
		0	balanced commercial relations with its partners and places special emphasis on
			respect for contractual agreements and terms of payment.' However, no evidence of practices to avoid price or short notice requirements that undermine Human
			Rights was found. [Code of Conduct, 2017: <u>r.lvmh-static.com</u>]
			Not Met: Describes practices to pay suppliers in line with agreed timeframes
			 Not Met: Describes practices to pay suppliers in line with agreed timetrames Not Met: Reviews own operations to mitigate negative impact of purchasing
			practices
			Score 2
			Not Met: Meets all requirements under score 1
			Not Met: Example of assessing and changing of purchasing practices
D.2.3	Manning and		The individual elements of the assessment are met or not as follows:
U.Z.3	Mapping and		Score 1
	disclosing the		Not Met: Identifies direct and indirect suppliers including manufacturing sites
	supply chain	0	Score 2
		U	Not Met: Discloses names and locations of significant parts of supply chain and
			how significance was defined
			Not Met: Discloses direct or indirect suppliers involved in higher-risk activities
D.2.4.a	Prohibition of		The individual elements of the assessment are met or not as follows:
U.Z.4.d			Score 1
	child labour:		Met: Indicates it does not use child labour: The Company's Code of Conduct
	Age verification		
	and corrective	0.5	states: 'LVMH respects and promotes the principles of the United Nations Global Compact, in particular, the fundamental rights at work: [] effective abolition of
	actions (in own		
	production or		 child labor' [Code of Conduct, 2017: r.lvmh-static.com] Not Met: Age verification of recruited workers
	, manufacturing		Score 2
	operations)		Not Met: Remediation if child labour found in operations
	5001013/		

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.4.b	Prohibition of		The individual elements of the assessment are met or not as follows:
	child labour:		Score 1
	Age verification		• Not Met: Requirements on child labour in supplier codes and contracts: Supplier
	and corrective		Code of Conduct states: 'work by children under the age of 16 is strictly prohibited.
	actions (in the		In countries where local laws set a higher age for child labor or set an age for
	supply chain)		completion of compulsory education higher than 16, the highest age is applicable.
	oupp:// c/		Workers under the age of 18 shall not perform any overtime or hazardous work or
		0	work a night shift. Suppliers may use lawful, legitimate, properly-managed workplace apprenticeship programs, such as student internships'. No evidence was
			found, however, in relation to remediation programmes in case child labour is
			found and age verification procedures. [Supplier Code of Conduct, 04/2022: r.lvmh-
			static.com]
			 Not Met: Describes work with suppliers on eliminating child labour
			Score 2
			 Not Met: Assessment of scope of child labour in supply chain
			 Not Met: Analysis of trends demonstrating progress
D.2.5.a	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Recruitment		Not Met: Job seekers/workers do not pay recruitment fee
	fees and costs	0	Not Met: Commitment to fully reimburse recruitment fees paid Score 2
	(in own	0	Not Met: Describes implementation and monitoring in own operations, incl.
	production or		service providers
	manufacturing		
	operations)		
D.2.5.b	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Recruitment		• Not Met: Requirements on debt/fees in supplier codes and contracts: The
	fees and costs		supplier code states that 'All forms of forced labor, slavery, servitude or trafficking
	(in the supply		in human beings by Suppliers, as well as withholding identity papers or work
	chain)		permits or requiring workers to deposit a bond or the use of any other constraint, is strictly prohibited. All workers are entitled to accept or leave their employment
		0	freely. []. Suppliers cannot require workers to work to repay a debt to them or to
			a third party'. No specific evidence found, however, in relation to recruitment fees.
			[Supplier Code of Conduct, 04/2022: r.lvmh-static.com]
			• Not Met: Describes work with suppliers on debt/fees for job seekers/workers
			Score 2
			Not Met: Assessment scope of payment of recruitment fees in supply chain
			Not Met: Analysis of trends demonstrating progress
D.2.5.c	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Wage practices		 Not Met: Pays workers regularly, in full and on time Not Met: Payslip workers shows wages and legitimate deductions
	(in own	0	Score 2
	production or		Not Met: Describes implementation and monitoring in own operations, incl.
	manufacturing		service providers
	operations)		
D.2.5.d	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Wage practices		• Met: Requirements on paying in full and on time in supplier codes and contracts:
	(in the supply		The Supplier Code of Conduct states: 'Suppliers must at minimum pay accurate
	chain)		wages in legal tender, in a timely manner and on a regular basis, no less than monthly, compensate workers for overtime hours at the legal rate, and meet all
			legal requirements relating to worker benefits [] Wage deductions shall not be
			used as a disciplinary measure [] The LVMH Group requires its Suppliers to
			guarantee that all workers receive benefits stipulated by applicable law or in any
		0.5	applicable collective bargaining agreements, company agreements, and other
			applicable negotiated individual or collective agreements.' [Supplier Code of
			Conduct, 04/2022: <u>r.lvmh-static.com</u>]
			• Not Met: Describes work with suppliers on paying workers regularly, in full and
			on time
			Score 2
			• Not Met: Assessment scope of failure to pay workers in full and on time in supply
			chain
			 Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	 The individual elements of the assessment are met or not as follows: Score 1 Not Met: Does not retain documents or restrict movement of workers Score 2 Not Met: Describes implementation and monitoring in own operations, incl. service providers
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Requirements on free movement in supplier codes and contracts: The Supplier Code of Conduct states that 'the LVMH Group does not tolerate any form of abusive or illegal labor in its supply chain such as forced labor or human trafficking. All forms of forced labor, slavery, servitude or trafficking in human beings by Suppliers, as well as withholding identity papers or work permits or requiring workers to deposit a bond or the use of any other constraint, is strictly prohibited. All workers are entitled to accept or leave their employment freely. Suppliers must respect workers freedom of movement. Suppliers cannot require workers to work to repay a debt to them or to a third party.' [Supplier Code of Conduct, 04/2022: <u>r.lvmh-static.com</u>] • Not Met: Describes working with suppliers on free movement of workers Score 2 • Not Met: Assessment of scope of restriction of movement in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commits to measures prohibiting interference with trade unions • Not Met: Discloses % total workforce covered by CB agreements: The Company's Social Responsibility Report discloses that 'throughout the world, 40.6% of the workforce is covered by employee representative bodies or unions, and 78% of Maisons have concluded at least one national or corporate collective bargaining agreement'. It is not clear the actual percentage of workers covered by collective bargaining agreements. [2021 Social and Environmental Responsibility Report, 04/2022: r.lvmh-static.com] Score 2 • Not Met: Meets both requirements under score 1
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Requirements on FoA/CB in suppliers codes and contracts: The Supplier Code of Conduct states that 'the LVMH Group requires its Suppliers to respect and recognize the right of workers to negotiate collectively, and to create or join labor organizations of their choice without any sanction, discrimination, or harassment. When applicable, Suppliers must provide workers' representatives with appropriate means to exercise their rights. Intimidation, threats, or discriminatory practices against workers' representatives are prohibited.' [Supplier Code of Conduct, 04/2022: r.lvmh-static.com] • Not Met: Describes work with suppliers on FoA/CB Score 2 • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.7.a	Health and		The individual elements of the assessment are met or not as follows:
	safety:		Score 1
	Fatalities, lost		• Met: Describes process to identify H&S risks and impacts: The Company's website
	days, injury,		discloses that 'the Group has therefore committed to developing and maintaining
	occupational		stringent standards of occupational health, safety and well-being that integrate a
	disease rates		high level of responsibility and respect for others. This belief requires the implementation of a comprehensive approach across all operations in order to
	(in own		develop a "zero accident" culture. This approach is based on five pillars: 1. Identify
	production of		health and safety risks. Risk assessment is the foundation of any effective and long-
	manufacturing		lasting approach. It can be used to identify health, safety and well-being priorities
	operations)		to prevent risks and take appropriate action in every situation. Commitment: each
			Maison structures its health and safety approach. 2. Providing responses to the
			identified risks relies on the implementation of roadmaps to prevent (through
			objectives and action plans), analyze and manage (through accident analysis,
			monitoring, corrective action plans and continuous improvement) those risks.
			These roadmaps will also address employee well-being. Commitment: each Maison
			regularly reviews its health and safety approach'. The Registration document also adds that 'They [Maisons] therefore put in place specific actions as part of the
			Group's overall investment, certification and training program. Health, safety and
		0.5	ergonomics assessments are regularly conducted at workshops, vineyards, stores
			and headquarters, following which action plans are drawn up to address any needs
			identified and the targets set by the Charter'. [Website: Health & Safty Charter,
			N/A: <u>lvmh.com</u>] & [Health and Safety Policy, 2022: <u>r.lvmh-static.com</u>]
			Not Met: Discloses injury rate or lost days for own workers in last reporting
			period
			Not Met: Discloses fatalities for own workers in last reporting period
			Not Met: Discloses occupational disease rate for own workers in last reporting period
			Score 2
			Not Met: Sets targets for H&S performance: LVMH Group's 2022 Annual Report
			states: 'looking after our employees' health and safety is an imperative for our
			Group. Together with our Maisons, we pushed ahead with the initiative launched in
			2021 by introducing the Health & Safety Charter. Its aim is to embed a "zero-
			accident" culture by setting precise targets for 2025. However, the targets set are
			related to the implementation of the Health and Safety Policy's five commitments.
			No evidence found of targets on injury rates, fatalities and occupational disease.
			[LVMH 2022 Annual Report, 03/2023: <u>r.lvmh-static.com</u>] • Not Met: Met targets or explains why not or how improve H&S management
			systems
D.2.7.b	Health and		The individual elements of the assessment are met or not as follows:
	safety:		Score 1
	Fatalities, lost		• Met: Requirements on H&S in supplier codes and contracts: The Supplier Code of
	days, injury,		Conduct states that 'in line with the LVMH Health & Safety Policy, Suppliers are expected to provide their workers with a safe and healthy workplace environment
	occupational		in order to avoid accidents, bodily injuries, or dangerous expositions which may be
	disease rates		caused by, related to, or result from their work, including during the operation of
	(in the supply		equipment, of chemical products, or during work-related travel. Suppliers are
	chain)		expected to set up procedures and trainings to detect, avoid, and mitigate as much
			as possible any hazards that constitute a risk to the health, hygiene, and safety of
			staff. Suppliers are required, at a minimum, to comply with all applicable local and
		0.5	international regulations and laws in this regard. Health and safety instructions
			must be put in place and widely communicated. Compliance by workers must be
			regularly evaluated. Workers must be provided with protective equipment appropriate to their activities. These same principles are applicable to housing
			provided by Suppliers.' [Supplier Code of Conduct, 04/2022: r.lvmh-static.com]
			Not Met: Discloses injury rate or lost days in supply chain in last reporting period
			• Not Met: Discloses fatalities for workers in supply chain in last reporting period
			Not Met: Discloses occupational disease rate in supply chain in last reporting
			period
			Score 2
			Not Met: Describes work with suppliers of H&S
			Not Met: Assessment of scope of H&S issues in supply chain
			 Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.8.a	Women's rights		The individual elements of the assessment are met or not as follows:
	(in own		Score 1
	production or		• Met: Describes processes to stop harassment and violence against women: The
	, manufacturing		Company's 2022 URD shares that 'in France, the Maisons have appointed a
	operations)		harassment officer to inform, guide and support employees in the fight against
	operations,		sexual harassment and sexist attitudes, while others have developed specific
			listening tools in conjunction with the Group's whistleblowing system, in particular
			in sensitive geographic regions. In Spain, Perfumes Loewe designed an action
			protocol that can be used by all its employees to tackle psychological, sexual and
			gender-based harassment. It has been deployed via The Holistic Concept, a well-
			being platform, and the Gympass program. All employees can also access mental
			health support delivered by Más Vida Red'. [2022 Universal Registration Document,
			03/2023: <u>r.lvmh-static.com</u>]
			• Met: Working conditions take into account gender issues: The Group's 2021 Social Responsibility Report discloses that 'physical and mental well-being, as work-
			life balance, are feel fulfilled and engaged. The Group integrated these
			considerations into its human resources policy, along with concerns regarding
			parenthood – such as pregnancy, young children, return from maternity or
			paternity leave and adoption – as well as preparation for retirement, employees
			with disabilities, and employees with caring responsibilities at home. This
		-	understanding is motivating a growing number of Maisons to offer employees
		2	company concierge services and spots in daycare centers []the Group offers
			maternity, second parent and adoption leave that goes above and beyond local
			statutory requirements to employees in many countries around the world'. [2021
			Social and Environmental Responsibility Report, 04/2022: r.lvmh-static.com]
			• Met: Measures and steps to address gender pay gap at all levels of employment:
			The Group's 2021 Social Responsibility Report states that 'based on the Gender
			Equality Index drawn up by the French government to measure the gender pay gap
			(which takes account of the consolidated LVMH Group companies in France that
			employ more than 1,000 people), the Group obtained a score of 92/100 in 2021, an
			improvement on the previous year [] Each Maison develops its own tools to
			identify and reduce any pay gaps within a professional category or compensate any
			pay gaps that may have arisen as a result of a person's gender'. In addition, the 2022 URD discloses that 'the Group and its Maisons made a public commitment in
			2022 to achieve pay equity by 2025 on a worldwide basis after laying the
			foundations for this target over the past several years [] LVMH scored 91.8 points
			out of 100 on the French government's Gender Equality Index in 2022'. [2021 Social
			and Environmental Responsibility Report, 04/2022: r.lvmh-static.com]
			Score 2
			Met: Meets all requirements under score 1
			 Met: Analysis of trends demonstrating progress closing gender pay gap: See
			above.
D.2.8.b	Women's rights		The individual elements of the assessment are met or not as follows:
	(in the supply		Score 1
	chain)		• Not Met: Requirements on women's rights in contracts/codes with suppliers:
			Although the code for suppliers states that works with suppliers who agree to
			comply with the principles stipulated in the United Nations Women's
		0	empowerment principles, no specific guidelines found, as required by this
		U	subindicator. [Supplier Code of Conduct, 04/2022: r.lvmh-static.com]
			Not Met: Describes work with suppliers on women's rights
			Score 2
			Not Met: Assessment of scope of unsafe working conditions/discrimination
			against women in supply chain
	Marking baur		Not Met: Analysis of trends demonstrating progress The individual elements of the assessment are met as follows:
D.2.9.a	Working hours		The individual elements of the assessment are met or not as follows: Score 1
	(in own		Not Met: Respects HRs regarding working hours/breaks/rest
	production or	0	Not Met: Assesses ability of workers to comply with working hours commitments
	manufacturing	U	when allocating work
	operations)		Score 2
			 Not Met: Describes implementation and monitoring in own operations

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.b	Working hours (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Requirements on working hours in codes/contracts with suppliers: The Supplier Code of Conduct states that the Group's 'suppliers must comply with all local laws and regulations applicable with respect to working hours, which shall not in any case exceed the maximum set by internationally recognized standards such as the International Labour Organization. Suppliers cannot impose excessive overtime hours. The total number of hours worked per week including overtime cannot exceed legal limits. Workers are entitled to at least the minimum number of days off established by applicable laws and at minimum must have at least one day off in every seven-day period.' [Supplier Code of Conduct, 04/2022: r.lvmh- static.com] • Not Met: Describes work with suppliers on working hours Score 2 • Not Met: Assesment of scope of excessive working hours in supply chain • Not Met: Analysis of trends demonstrating progress

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious		Area: Forced Labour
	allegation No 1		• Headline: Rajviti and other recruiters accused of exploiting migrant workers and committing other labour violations in French vineyards for Danish champagne retailers
			 Story: Since September 2021, France has been the country in which Europol and national authorities have launched most new investigations into human trafficking. In September 2020, a French court reportedly sentenced the owner and an accomplice of the recruitment company Rajviti to three years in prison for exploiting refugees to work in grape fields in France. Reportedly, refugees at French asylum centers were poached by Rajviti to perform seasonal work for champagne producers, such as LVMH's Veuve Clicquot, which has distributed its champagne via Moet Hennessy Danmark to retailers such as Supervin and VildMedVin in Denmark. Rajviti has been accused of exploiting refugees and migrant workers to perform work without pay, work long hours without access to water, and live under inhumane conditions in production facilities or basements while being exposed to asbestos. In August 2018, French police uncovered the exploitation of the refugees by Rajviti along with two other recruitment companies, Sarl Serviti and Viti-Chenille. A manager of Viti-Chenille has also been sentenced for knowing about the poor working conditions. According to NGOs, France is experiencing issues with human trafficking networks that exploit vulnerable migrants waiting in reception centers. [DanWatch, 27/12/2021, ''World-renowned champagne can hold the recipe for
E(1).1	The company		exploitation and human trafficking": <u>danwatch.dk</u>] The individual elements of the assessment are met or not as follows:
	has responded publicly to the allegation	0	Score 1 • Not Met: Public response: A spokesperson for the Company's subsidiary replied to DanWatch that "Veuve Clicquot strongly distances itself from the facts to which you refer that reflect neither our values nor our methods. Veuve Clicquot would like to remind you that in the trial of 'hidden work' and neglect of grape pickers during the 2018 harvest, we were never implicated and our employees were acquitted on September 11, 2020." However, a response from the parent Company was not found. [DanWatch, 27/12/2021: <u>danwatch.dk</u>] Score 2 • Not Met: Detailed response
E(1).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engaged with stakeholders • Not Met: Identified cause Score 2 • Not Met: Identified and implemented improvements: Brune Failliot, Veuve Clicquot's Head of Communications, informed Danwatch that they have strengthened control of their subcontractors since 2019 and that inspections are regularly carried out during harvest both in the vineyards and in the accommodations. However, no evidence was found that the parent Company LVMH Moet Hennessy - Louis Vuitton has implemented any changes. [DanWatch, 27/12/2021: danwatch.dk] • Not Met: Stakeholder input to steps taken

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link: Employees of the Company's subsidiary Veuve Clicquot were tried in relation to the case before a criminal court in Reims. They were acquitted of the criminal charges on 11 September 2020. However, using the documents presented in the court case Danwatch was able to establish a supply chain link from Veuve Clicquot to the forced labour via the supplier Viti-Chenille. Therefore, the acquittal in the criminal case is not sufficient to prove the Company's subsidiary was not linked to the alleged rights violations. [DanWatch, 27/12/2021: danwatch.dk] Score 2 • Not Met: Remedy satisfactory to stakeholders • Not Met: Independent remedy process used: Employees of the Company's subsidiary Veuve Clicquot were tried in relation to the case before a criminal court in Reims. They were acquitted of the criminal charges on 11 September 2020. However, using the documents presented in the court case Danwatch was able to establish a supply chain link from Veuve Clicquot to the forced labour via the supplier Viti-Chenille. Therefore, the acquittal in the criminal case is not sufficient to prove the Company's subsidiary was not linked to the alleged rights violations. [DanWatch, 27/12/2021: danwatch.dk]

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