

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Entity Report Financial Year 2023

Beauty Specialty Holding, LLC

May 23, 2024

1. Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) requires that businesses state actions they have taken during the prior fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a joint report filed by Beauty Specialty Holding, LLC, the controlling parent company of Bath & Body Works (Canada) Corp., which imports, sells and distributes products in Canada (collectively “Bath & Body Works”). This report refers to Bath & Body Works’ 2023 financial year ended February 3, 2024.

2. Steps Taken in the Previous Financial Year to Prevent and Reduce the Risk of Forced Labour or Child Labour

Bath & Body Works has taken the following steps to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods which are imported, sold and distributed in Canada:

- Mapping activities;
- Mapping supply chains;
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization’s activities and supply chains;
- Developing and implementing an action plan for addressing forced labour and/or child labour;
- Addressing practices in the organization’s activities and supply chains that increase the risk of forced labour and/or child labour;
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization’s activities and supply chains;
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour;
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains;
- Developing and implementing anti-forced labour and/or -child labour contractual clauses;
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists;
- Auditing suppliers;
- Monitoring suppliers;
- Developing and implementing training and awareness materials on forced labour and/or child labour; and
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.

3. Bath & Body Works’ Structure, Activities and Supply Chains

Structure

Beauty Specialty Holding, LLC is the controlling parent company of Bath & Body Works (Canada) Corp. which imports, sells and distributes products in Canada.

Activities and Supply Chain

Bath & Body Works offers a wide range of home fragrance, body care and soaps and sanitizer products that are sold or made available through its stores and website.

Bath & Body Works' predominantly U.S.-based, vertically integrated supply chain enables it to successfully navigate a dynamic environment and to respond to changing consumer preferences with speed and agility. Bath & Body Works' supplier base includes long-standing supplier relationships, and the majority of its products are produced at Beauty Park, a business park that includes several key suppliers within close proximity to its Columbus, Ohio distribution centers. These strategic supplier relationships provide deep capabilities across Bath & Body Works' product categories. Additionally, for non-merchandise materials, including those used for store design and construction and design and development, Bath & Body Works maintains close business relationships with its production partners both domestically and overseas.

While Bath & Body Works-owned distribution and fulfillment centers located in central Ohio are core to its operations, it also utilizes third-party distribution centers located throughout North America to position inventory geographically closer to its customers. Third party-operated direct channel fulfillment centers throughout North America are also used to support peak needs.

4. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

Bath & Body Works recognizes that responsible business practices start with partnering with suppliers that have an excellent compliance track record and share its core values. Bath & Body Works' suppliers must sign a sourcing agreement that requires the suppliers to comply with its policies and all applicable laws and regulations. The Bath & Body Works Supplier Compliance Guidebook contains its Supplier Code of Conduct and compliance standards related to forced labour and human trafficking, as well as its Conflict Minerals Policy, which states that Bath & Body Works prohibits its suppliers from using conflict minerals.

Bath & Body Works' efforts at preventing forced labour and human trafficking in its supply chain include conducting audits throughout the year. If it determines that a supplier is not in compliance, Bath & Body Works partners with the supplier to bring them into compliance. A supplier's failure to meet Bath & Body Works' requirements will result in corrective action, which may include removing the supplier from its approved vendor list. Bath & Body Works also provides training as needed to support understanding and compliance with its policies.

In addition to monitoring supplier social compliance, Bath & Body Works also engages with suppliers throughout the year, including at our annual vendor conference, on a diverse range of social impact topics. For example, in 2023, Bath & Body Works sent reminders to its suppliers about its zero-tolerance stance on human rights violations and forced or child labour.

5. Risk of Forced or Child Labour Being Used and the Steps Bath & Body Works Has Taken to Assess and Manage That Risk

Identification of Risks

Bath & Body Works is aware that its global supply chain and the industries in which it operates present a risk of forced labour and child labour. Bath & Body Works aims to identify risks to the best of its knowledge while also working to identify emerging risks with respect to child and forced labour. Bath & Body Works has identified risks in the following areas:

- The locations of activities, operations or factories;
- The raw materials or commodities used in its supply chains;
- Tier one (direct) suppliers;
- Tier two suppliers;
- Tier three suppliers;
- The use of outsourced, contracted or subcontracted labour; and

- The use of migrant labour.

Bath & Body Works has also identified risks in the following sectors/industries:

- Agriculture;
- Mining, quarrying, and oil and gas extraction;
- Manufacturing; and
- Transportation and warehousing.

Assessment and Management of Risk

Bath & Body Works assesses and manages the risk of forced labour or child labour being used in the above-referenced sectors/industries by conducting due diligence pursuant to the policies and the due diligence procedures referenced in Section 4, above.

6. Measures Taken to Remediate Any Forced Labour or Child Labour in Bath & Body Works' Activities and Supply Chains

Bath & Body Works has not identified any forced labour or child labour in its activities or supply chains.

7. Remediation of Loss of Income to the Most Vulnerable Families Which Results from Any Measures Taken to Eliminate the Use of Forced Labour or Child Labour in Bath & Body Works' Activities and Supply Chains

As Bath & Body Works has not identified any forced or child labour in its supply chain, there have been no identified or reported instances of loss of income to vulnerable families.

8. Training Provided to Employees on Forced Labour and Child Labour

Bath & Body Works requires employees who make contracting or purchasing decisions to receive mandatory forced labour and child labour training, and requires additional employees to receive this training depending on the relevance of the training to the employee's role and responsibilities. Bath & Body Works also engages with suppliers throughout the year on a diverse range of social impact topics, including forced and child labour.

9. How Bath & Body Works Assesses its Effectiveness in Ensuring That Forced Labour and Child Labour are Not Being Used in its Activities and Supply Chains

Bath & Body Works assesses the effectiveness of its actions to reduce and prevent the risk of forced and child labour within its activities and supply chains by:

- Regularly reviewing Bath & Body Works' policies and procedures related to forced labour and child labour; and
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators.

Approval and Attestation

Beauty Specialty Holding, LLC is a member-managed limited liability company formed in the State of Delaware. The sole member of Beauty Specialty Holding, LLC is Bath & Body Works, Inc. Bath & Body Works, Inc., in its capacity as the sole member of Beauty Specialty Holding, LLC, has approved this report and has delegated authority to Michael C. Wu, the President, Chief Legal Officer and Corporate Secretary of Beauty Specialty Holding, LLC, to execute this attestation.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

BEAUTY SPECIALTY HOLDING, LLC

By: 

Date: May 23, 2024

Name: Michael C. Wu

Title: President, Chief Legal Officer & Corporate Secretary