MANAGEMENT REPORT OF THE BOARD OF DIRECTORS: THE GROUP

Ethics and responsibility

1. BACKGROUND

2. STANDARDS
   2.1 International instruments
   2.2 Internal standards

3. GOVERNANCE

4. RISK IDENTIFICATION

5. RISK MANAGEMENT
   5.1 Comprehensive program to protect ecosystems and natural resources
   5.2 Supplier assessment and support
   5.3 Unrelenting focus on quality and safety
   5.4 Ongoing efforts to attract and support talent
   5.5 Constant focus on employee inclusion and fulfillment
   5.6 Integrity in business
   5.7 Responsible management of personal data

6. INDEPENDENT VERIFIER’S REPORT ON THE CONSOLIDATED STATEMENT OF NON-FINANCIAL PERFORMANCE

7. CROSS-REFERENCE TABLES
   7.1 Statement of non-financial performance
   7.2 Vigilance plan
1. BACKGROUND

LVMH has always sought to:

- ensure that its practices reflect the highest standards of integrity, responsibility and respect for its partners;
- offer a working environment that allows its employees to fully express their talents and implement their skills and expertise;
- ensure that its Maisons define and adapt their production processes, habits and behaviors in order to continuously improve their response to the environmental challenges they face;
- participate in the regional development of the areas in which the Group operates through its activities;
- mobilize resources and skills to serve philanthropic initiatives and projects of general interest, and promote access to art and culture for as many people as possible.

As a responsible and committed stakeholder, the Group seeks to anticipate and meet the expectations of civil society in relation to corporate social and environmental responsibility, which include the following:

- taking into account changing career expectations and helping employees navigate, in particular, new unique career paths, technological changes and new demographics;
- responding to environmental challenges in light, in particular, of urgent changes called for by climate change;
- greater transparency in supply management to ensure that every stakeholder in the value chain offers satisfactory living and working conditions and uses environmentally friendly production methods;
- demand for integrity in business, made effective by the implementation of procedures to prevent and detect breaches of probity in financial life;
- sensitivity to the use of personal data, a key issue in safeguarding the fundamental right to privacy.

Information about the Group’s Vigilance Plan and Statement of Non-Financial Performance can be found in the cross-reference tables at the end of this section.

2. STANDARDS

The LVMH group stays true to its uniqueness through a meticulous dedication to excellence. This dedication requires an unwavering commitment to the highest standards in terms of ethics, corporate social responsibility and respect for the environment.

In recent years, the Group has supported or signed up for a number of international standards, implementation of which it promotes within its sphere of influence, as well as putting in place its own internal standards.

2.1 International instruments

For many years now, the LVMH group has demonstrated its desire to act as a responsible corporate citizen and align its operations and strategy to support various internationally recognized benchmarks, including the following:

- the United Nations Global Compact, to which the Group signed up in 2003, as well as the Caring for Climate initiative;
- the Universal Declaration of Human Rights;
- OECD Guidelines;
- the International Labour Organization (ILO)’s Fundamental Conventions;
- the 17 Sustainable Development Goals drawn up and developed by the United Nations;
- the French Diversity Charter, signed by the Group in 2007;
- the United Nations Women’s Empowerment Principles, signed by the Group in 2013;
- France’s national biodiversity protection strategy;
- the Kimberley Process, an international system for certifying rough diamonds;
- the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES);
- UNESCO’s intergovernmental scientific program, “Man and the Biosphere” (MAB), aimed at protecting global biodiversity;
- the United Nations’ standards of conduct for business tackling discrimination against lesbian, gay, bi, trans and intersex (LGBTI) people;
- the International Labour Organization (ILO) Global Business and Disability Network Charter.
2.2 Internal standards

LVMH Code of Conduct

LVMH’s Code of Conduct is designed to provide a common ethical foundation for the Group and its Maisons. It outlines the rules to be followed by all employees as they go about their work and is structured around the following six core principles:

- acting responsibly and compassionately;
- offering a fulfilling work environment and valuing talent;
- committing to protect the environment;
- winning the trust of customers;
- winning the trust of shareholders;
- embodying and promoting integrity in the conduct of business.

Supported by the members of the Executive Committee and Presidents of the Maisons, it promotes consistency and continuous improvement across the Group’s various entities. It does not replace existing codes and charters within Maisons, but serves as a shared foundation and source of inspiration. Where appropriate, its policies are defined in greater detail by Maison according to its business sector or location. Furthermore, locally applicable codes and charters are implemented where this is appropriate in the light of local laws and regulations.

The Code has been translated into more than 10 languages and is widely disseminated across the Group. Supplementary tools have also been developed to help employees better understand and apply the principles set out in the Code, including an e-learning module and various communication materials.

Supplier Code of Conduct

The Supplier Code of Conduct sets out the Group’s requirements for its partners in corporate social responsibility, human rights, the environment, the fight against corruption and, more broadly, high standards of business integrity.

The Supplier Code of Conduct has been disseminated across the Group’s Maisons; providers subject to the Code are required to comply with the principles laid down in it.

This Code specifies requirements relating to labor (prohibition of forced labor, child labor, harassment and discrimination; provisions regarding pay, working hours, freedom of association, health and safety), environmental provisions, business conduct (in particular relating to legality, customs, security and subcontracting) and measures to prevent and combat corruption and influence-peddling that must be respected by suppliers and any subcontractors in managing their business.

The Supplier Code of Conduct states that suppliers to LVMH and its Maisons must take responsibility for work undertaken by their own subcontractors and suppliers, and make sure that they comply with the principles laid down in the Code and any other relevant obligations.

It also gives LVMH the ability to verify compliance with these principles by its suppliers and subcontractors.

If the Supplier Code of Conduct is violated by one of its suppliers – or by a supplier or subcontractor of one of its suppliers – LVMH or the Maison concerned reserve the right to suspend or end the commercial relationship, subject to the conditions provided by law and depending on the severity of the violations identified.

Work was undertaken in 2021 to revise the Code of Conduct. This involved LVMH’s various stakeholders, including the Legal Department, Ethics and Compliance, Human Resources, Purchasing, etc. An official new version will be released in 2022.

Environmental Charter

Adopted in 2001, the Environmental Charter is the founding document for LVMH’s five main aims with regard to the environment:

- striving for high environmental performance;
- encouraging collective commitment;
- managing environmental risks;
- designing products that factor in innovation and environmental creativity;
- making a commitment that goes beyond the Company.

It encourages the President of each Maison to demonstrate commitment to this approach through concrete actions.

The Charter was given a significant boost by the strategic LIFE (LVMH Initiatives For the Environment) program, launched in 2011, described in the “Environment and sustainability” section.

Recruitment Code of Conduct

The LVMH Recruitment Code of Conduct, implemented in 2009, has been widely disseminated to all employees involved in recruitment processes across the Group. It sets forth the ethical hiring principles to be observed at LVMH in the form of fourteen commitments. Special emphasis is placed on preventing any form of discrimination and on promoting diversity. The Group began work on updating the Recruitment Code of Conduct in 2020 to better take into account new challenges and situations relating to recruitment, which will be completed in 2022.

Animal-Based Raw Materials Sourcing Charter

In 2019, the Group launched its Animal-Based Raw Materials Sourcing Charter. This charter is the result of a long process of scientific research and collaboration between LVMH’s environmental experts, its Maisons and their suppliers. The exhaustive charter covers the full range of issues concerning the sourcing of fur, leather, exotic leather, wool and feathers. It allows the Group to make long-term commitments to achieving progress in three areas: full traceability in supply chains; animal farming and trapping conditions; and respect for local populations,
the environment and biodiversity. Under the charter, a scientific committee has been formed, and each year it will support and supervise a number of research projects aimed at driving progress in this area.

**Charter on Working Relations with Fashion Models**

In 2017, the Group drew up a Charter on Working Relations with Fashion Models in consultation with the Kering group and sector professionals motivated by a shared desire to promote dignity, health and well-being among fashion models.

The Charter, which applies to all Maisons worldwide, aims to bring about genuine change in the fashion world by rooting out certain behaviors and practices not in keeping with the Group’s values and raising awareness among fashion models that they are full-fledged stakeholders in these changes.

To help spread the principles laid down in the Charter, the LVMH and Kering groups have set up a dedicated website, wecareformodels.com. The site provides fashion models with best practice and advice from independent nutritionists and coaches.

**Internal Competition Law Compliance Charter**

In 2012, the Group formalized its commitment to uphold free and fair competition by adopting an Internal Competition Law Compliance Charter. The Charter aims to help develop a true culture of compliance with competition rules within the Group.

This charter sets out the main rules that should be known by all employees in conducting commercial relationships on a day-to-day basis, and defines in a pragmatic way the standards of conduct expected of them. In particular, LVMH prohibits any abuse of dominant position, concerted practice or unlawful agreement, through understandings, projects, arrangements or behaviors which have been coordinated between competitors concerning prices, territories, market shares or customers. The Charter is available on the Ethics & Compliance Intranet.

**Health and Safety Charter**

Signed by the Group’s Executive Committee in April 2021, the Health and Safety Charter serves as the basis for a comprehensive approach across all the LVMH group’s operations with the aim of developing a “zero accident” culture. The Group and its Maisons undertake to protect employee health and safety through five pillars of action: identify their priorities in order to structure their approach; draw up an action plan to be reviewed regularly; report on progress made using the approach, in particular by submitting frequency rate results to each Maison’s management committee; engage every employee in the approach, notably by raising awareness about first aid measures; and maintain a virtuous culture by ensuring strong collaboration between the Group and the Maisons. Each commitment is associated with a target to be met by 2025. The charter will be covered by an annual reporting process, with results published in this document.

### 3. GOVERNANCE

Dedicated governance arrangements are in place to ensure the Group’s values and ethical standards are put into practice.

The Board of Directors’ Ethics & Sustainable Development Committee – the majority of whose members are Independent Directors – ensures compliance with the individual and shared values on which the Group bases its actions. The Committee provides leadership on matters of ethics as well as environmental, workforce-related and social responsibility.

The Ethics & Compliance Department steers and coordinates LVMH’s procedures with regard to anti-corruption, personal data protection, respecting international sanctions, human rights and anti-money laundering. To ensure greater independence and visibility, in April 2021 it became part of the Group’s newly created “General Administration and Legal Affairs” Department, reporting directly to the Chairman and Chief Executive Officer.

It has its own budget and headcount and is also supported by the representatives of various Group departments so as to promote coordination on cross-functional projects led by it. An Ethics & Compliance Committee groups together the main centralized functions: finance, human resources, legal, audit and internal control, communications and IT systems security.

Each function head contributes their expertise to support the work of the Ethics & Compliance Department. The Committee meets periodically and when necessary.

The Ethics & Compliance Department is supported by a network of over 80 officers within the Maisons. Appointed by the Presidents of each Maison, their role is to implement the Group’s ethics and compliance standards within their Maison. They report on a regular basis to their Maison’s governing body as well as to the Group’s Ethics & Compliance Director.

In addition, various communities have been set up to foster coordination between the Maisons and drive shared initiatives in the areas of ethics and environmental, social and societal responsibility, in particular:

- the network of CSR Officers at Maisons, who help organize the measures to be implemented and facilitate their application by the Maisons, who will then make the necessary adjustments in line with their own values, their environment, and the expectations of their employees and customers. These officers are supported by a network of CSR Officers in major geographic areas;
4. RISK IDENTIFICATION

The Group’s activities involve exposure to various risks that are the object of regular risk management and identification, notably within the context of regulatory reforms.

A global risk analysis focused primarily on risks associated with the Group’s supply chain was carried out with the assistance of Verisk Maplecroft, an external service provider specialized in analyzing political, economic, social and environmental risks. In view of the economic climate in 2021, the Maisons continued to use the analysis resulting from the work carried out in 2020. A new general risk analysis exercise will be conducted in 2022 on the basis of figures for 2021.

The approach is based on an assessment comparing external assessments of risk levels by this external service provider with the quantitative information provided internally by a number of the Group’s Maisons, especially the amount of purchases by category and supplier. This work has allowed the Group to categorize its suppliers by criticality (a critical supplier is one playing a major role in a company process, i.e. any supplier that if affected by a failure, disruptions or other issues would lead to a complete or partial suspension of the Company’s operations).

The exercise analyzes a wide variety of factors by geography and sector:

- Human rights: Decent pay and working hours, workplace discrimination, freedom of association and trade union membership, health and safety, forced labor, etc.
- Environment: Air quality, waste management, water stress, water quality, deforestation, climate change, risk of drought, CO₂ emissions indicator, etc.

The analysis of all these risk factors highlights the severity of potential risks arising from the Group’s activities and those of its supply chain.

With regard to the risk of corruption, the Group’s Maisons have each identified and ranked risk scenarios relating to their operations within the framework of specific risk mapping exercises based on interviews with representatives of the various functions and regions. These risk maps demonstrate their “gross” and “net” risk exposure (to take account of the risk management measures in place). The results were presented to the Maisons’ governing bodies and action plans have been defined to manage the risks identified.

The list of risks classified by representatives of the Group’s central functions and Executive Management as “key risks” in the Statement of Non-Financial Performance in light of the Group’s activities has remained unchanged this year:

- impact on ecosystems and depletion of natural resources;
- setting up and maintaining responsible supply chains;
- safeguarding health and safety at work;
- loss of key skills and expertise;
- implementation of a policy to promote employee inclusion and fulfillment;
- shortcomings in the implementation of personal data protection rules;
- shortcomings in the implementation of business practice compliance arrangements.

The updating of this risk analysis, scheduled for 2022 on the basis of 2021 purchasing data, will be done in a more precise way taking account of Regional/State indices for certain large countries such as China and the United States.
5. **RISK MANAGEMENT**

In keeping with its aim of constantly improving its management of non-financial risks, the Group has set up a system for regularly monitoring risks relating to ethical, social and environmental responsibility.

The general risk analysis exercise (described in the previous section) 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. The aim of this program is to ensure the best possible alignment between the gross risks identified by the risk-mapping exercise and supplier audit programs as well as risk mitigation actions.

By way of example, in preparing the 2020 risk map on the basis of 2019 data, a supplier based in Madagascar was identified as presenting a very high risk in the area of human rights. An analysis of the audits carried out in 2019 and 2020 revealed that the Maisons working with this supplier had conducted three audits over the last two years, including one also covering environmental issues, which found its performance to be satisfactory in 2020. In the light of this result, a reaudit was not deemed necessary in 2021.

This information is taken into account in letters of representation concerning risk management and internal control arrangements under the “ERICA” approach, an overview of which can be found in the “Financial and operational risk management and internal control” section.

Each year, the Ethics & Compliance Department reports to the Ethics & Sustainable Development Committee of the Board of Directors on the implementation of the Group’s ethics and compliance policy. The Group Ethics & Compliance Director delivered presentations to this committee on one occasion in 2021.

The policies put in place to manage the key risks identified above, together with their results, where relevant, are set out in this section. Readers are referred to the “Attracting and retaining talent” and “Environment and sustainability” sections where applicable.

5.1 **Comprehensive program to protect ecosystems and natural resources**

Because its businesses celebrate nature at its purest and most beautiful, LVMH sees preserving the environment as a strategic imperative. The fact that this imperative is built into all the Group’s activities constitutes an essential driver of its growth strategy, enabling it to respond to stakeholders’ expectations and constantly stimulate innovation.

Built around nine key aspects of the Group’s environmental performance, the global LIFE (LVMH Initiatives For the Environment) program provides a structure for this approach, from design through to product sale. It is presented in detail in the “Environment and sustainability” section.

5.2 **Supplier assessment and support**

The LVMH group considers it very important that the Maisons and the Group’s partners abide by a shared body of rules, practices and principles in relation to ethics, corporate social responsibility and environmental protection. The complexity of global supply chains means there is a risk of exposure to practices that run counter to these rules and values.

The Group’s responsible supply chain management approach therefore aims to motivate suppliers and every link in the supply chains involved to meet ethical, social and environmental requirements.

Supporting suppliers has long been a strategic focus for LVMH, with a view to maintaining sustainable relationships based on a shared desire for excellence. The Group pursues an overarching approach aimed at ensuring that its partners adopt practices that are environmentally friendly and respect human rights.

This approach is based on a combination of the following:

- site audits of our suppliers (Tier 1 and higher) to check that the Group’s requirements are met on the ground, and implementation of corrective action programs in the event of compliance failures;
- supplier support and training;
- actively participating in cross-sector initiatives covering high-risk areas.

To a large extent, actions implemented address issues connected with both the environment and human rights.

**Identifying priority areas**

The non-financial general risk analysis exercise described under §4 helps determine which suppliers should be audited as a priority. It takes into account risks related to the country, purchasing category and amount of purchases in question.

As part of its Convergence project, the Group continued to expand its use of the EcoVadis platform in 2021. Following the completion of the risk-mapping exercise each year, the main suppliers identified as at risk may be assessed using the EcoVadis...
methodology. This allows for the assessment of their ethical, social and environmental performance through the collection of documentary data, external intelligence and online research.

More than 1,450 suppliers were invited to join the platform in 2021. 66% of suppliers were reassessed and 72% of these improved their score. The average improvement since the first assessment is now 54 points (compared with the overall EcoVadis average of 44 points). Following on from the Group Purchasing Department, Louis Vuitton, the Perfumes and Cosmetics business group, Sephora, the Wines and Spirits business group, Bvlgari, Fendi and Loewe in 2020, several Maisons in the Fashion and Leather Goods business groups are planning to come on board in 2022.

Assessment and corrective action plans

LVMH is unique in that it undertakes much of its own manufacturing in-house, with subcontracting accounting for only a small proportion of the cost of sales. The Group is therefore able to directly ensure that working conditions are safe and human rights respected across a significant part of its production.

The Maisons apply reasonable due diligence measures and audit their suppliers – and, above Tier 1, their subcontractors – to ensure they meet the requirements laid down in the LVMH Supplier Code of Conduct.

Contracts entered into with suppliers of raw materials and product components with whom the Group maintains a direct relationship include a clause requiring them to be transparent about their supply chain by disclosing their subcontractors.

Some Maisons, such as Loewe, use preselection questionnaires. 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 Group uses specialist independent firms to conduct these audits. In 2021, 1,512 audits (not including EcoVadis assessments) were undertaken at 1,201 suppliers and subcontractors. Thanks to a slight improvement in the health situation in the countries where production facilities are located, this figure was higher than in 2020, when 1,325 audits were carried out.

Of all the audits undertaken, 78% covered both workforce-related aspects (health and safety, forced labor, child labor, decent pay, working hours, discrimination, freedom of association and collective bargaining, the right to strike, anti-corruption, etc.) and environmental aspects (environmental management system, water usage and pollution, gas emissions and air pollution, management of chemicals, waste management, types of raw materials used, etc.). A total of 17% of audits covered only workforce-related aspects, and 5% only environmental aspects.

There was a significant increase in the number of audits covering all social and environmental aspects thanks to the introduction of new LVMH guidelines in January 2021.

In keeping with the aim of monitoring at-risk suppliers and ensuring permanent controls on their level of compliance, around one-quarter of the audits carried out in 2021 involved suppliers that had already been audited in previous years.

In view of the economic disruption experienced in 2020 and 2021, the figures below relate to 2019:

<table>
<thead>
<tr>
<th>Breakdown of suppliers by volume of purchases (as %)</th>
<th>Europe</th>
<th>North America</th>
<th>Asia</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>63</td>
<td>20</td>
<td>15</td>
<td>2</td>
</tr>
<tr>
<td>Breakdown of suppliers by number (as %)</td>
<td>73</td>
<td>13</td>
<td>11</td>
<td>3</td>
</tr>
<tr>
<td>Breakdown of audits (as %)</td>
<td>67</td>
<td>1</td>
<td>28</td>
<td>4</td>
</tr>
</tbody>
</table>

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. In 2021, additional specific controls were introduced relating to tasks performed by people working from home.

In 2021, 5% of suppliers audited failed to meet the Group’s requirements based on a four-tier performance scale that takes into account the number and severity of critical compliance failures. The majority of compliance failures identified had to do with health and safety. In such cases, the Group always works with the supplier to draw up a corrective action plan, implementation of which is monitored by the buyer responsible for the relationship within the relevant Maison. Some Maisons, such as Berluti, Fendi, Tiffany & Co. and Parfums Christian Dior, also offered personalized coaching to help suppliers correct compliance failures identified during audits.

When, in spite of the support offered by LVMH, a supplier or its subcontractors prove unwilling to make the effort required to meet the relevant requirements, the relationship is terminated. Given the increasing maturity of the suppliers for the Group’s Maisons, 17 contracts were terminated in 2021 (compared with six in 2020). Similarly, one production site was not approved following unsatisfactory preliminary audits.

Following work carried out in 2020 with the aim of establishing a shared set of workforce-related audit guidelines for all the Group’s Maisons, these guidelines – which also include a section concerned with the assessment of environmental and anti-corruption risks – were applied starting in January 2021.
Supplier and buyer training

In keeping with its aim of providing support and fostering continuous improvement, the Group regularly offers its suppliers training opportunities. For example, in 2021:

- The sixth LVMH Italia sustainable development coordination seminar was held in Milan in November, focusing on understanding and implementation of the LIFE 360 program.
- In October, seven Maisons (Acqua di Parma, Berluti, Bvlgari, Fendi, Givenchy, Loro Piana and Louis Vuitton) got together to organize an online training course for 25 managers of supplier sites based in Italy. In December, ten Maisons (Berluti, Bvlgari, Celine, Fendi, Givenchy, Loewe, Louis Vuitton, Moët Hennessy, Parfums Christian Dior and Sephora) organized an online training course for 65 managers of supplier sites based in China. Given the results of the global risk analysis and the findings of certain audits, these training sessions again focused on human rights, health and safety, the environment, and anti-corruption.
- Throughout 2021, Berluti conducted checks on 14 suppliers to ensure that specific Covid-19-related protocols were implemented. A total of 45 protocols have been brought in since the start of the pandemic.

In addition to training on responsible purchasing practices held at certain Maisons in previous years, the decision was made in 2021 to create an LVMH-wide training program on this subject. Delivery of this training program, developed with the support of consulting firm Des Enjeux et Des Hommes, will begin in 2022.

Participation in multi-party initiatives covering high-risk areas

In addition to its actions aimed at direct suppliers, LVMH takes part in initiatives intended to improve visibility along supply chains and throughout subcontractor networks, to ensure that it can best assess and support all stakeholders.

Working groups have been put in place and targeted programs rolled out to address issues specific to the Group’s individual business groups. To maximize efficiency and optimize influence over subcontractors’ practices, preference is generally given to sector-specific initiatives covering multiple purchasing entities.

For Maisons in the Watches and Jewelry business group, the mining sector, which is highly fragmented and relies substantially on the informal economy, carries significant risks to human rights. As such, the Maisons have formally committed under the LIFE 360 program to ensuring that all gold supplies are certified by the Responsible Jewellery Council (RJC).

Alongside suppliers and other pioneering competitors, LVMH also participates in the Coloured Gemstones Working Group (CGWG) run by sustainable development consultancy The Dragonfly Initiative, aimed at optimizing oversight of supply arrangements for colored gemstones. In 2020, a shared platform for the CGWG’s member companies was created and made available to the Maisons. Tiffany & Co.’s diamond supply policy goes beyond the obligations of the Kimberley Process (which defines “conflict-free” diamonds), and requires its suppliers to comply with the Diamond Source Warranty Protocol.

Maisons in the Perfumes and Cosmetics business group have signed up for the Responsible Beauty Initiative run by EcoVadis, working with major sector players to develop action plans in response to business-specific issues. The business group is also involved in the Responsible Mica Initiative, which aims to pool sector stakeholders’ resources to ensure acceptable working conditions in the sector by 2022. Work to map Indian mica supply chains began in 2015, followed by a program of audits down to the individual mine level. Over 80% of the supply chain has been covered to date.

The business group also joined Action for Sustainable Derivatives (ASD), a collaborative initiative jointly managed and overseen by BSR and Transitions. ASD brings together large companies in the cosmetics sector and the oleochemical industry to achieve their shared goal of improving traceability, working conditions and practices throughout the entire palm derivatives supply chain.

For Maisons in the Fashion and Leather Goods business group, specific traceability requirements applicable to the leather and cotton sectors have been incorporated into the LIFE 360 program. Leather traceability is taken into account via the score resulting from audits of the Leather Working Group standard. A leather coordination seminar attended by 30 participants was held in November 2021 in Florence at one of the tanneries supplying LVMH’s Maisons. Targets for the certification of raw materials like cotton and leather were set as part of the LIFE 360 program; the results are presented in the “Environment and sustainability” section, §3.2 “Key achievements in 2021: Biodiversity”.

For all Maisons, particular attention is paid to purchases of packaging materials due to fragmentation of production processes in this sector. Specific tools are used to assess and improve the environmental performance of packaging.

In 2021, LVMH appointed a team to draw up a fair wage policy to be applied both internally and externally, whose principles will be announced in the first quarter of 2022.

For several years, LVMH has taken part in Utthan, an embroidery industry initiative bringing together major luxury brands. This initiative aims to empower artisans in Mumbai’s hand embroidery cluster, where many of the embroiderers partnering with the Maisons are based, and help them gain recognition for their skills. The initiative also includes an on-site training program for embroiderers. Audit guidelines and levels of compliance were reviewed and simplified in 2021, and updated to be brought in line with new regulations in India.
5.3 Unrelenting focus on quality and safety

LVMH is continuously looking to offer products of the highest quality, through research and innovation and high standards in the selection of materials and the implementation of expertise in its activities. The Group is motivated by a constant desire to protect the health and safety of its stakeholders.

As regards its own employees, LVMH pursues a health, safety and well-being policy that is set out in the “Attracting and retaining talent” section.

As regards its suppliers’ employees, the assessment criteria used in workforce audits of suppliers at Tier 1 and above include aspects related to health and safety (see §5.2).

As regards its customers, the Group is particularly attentive to two key issues: prudent use of chemical compounds in production processes and promoting responsible consumption of wines and spirits.

Prudent use of chemical compounds in production processes

LVMH is committed to safeguarding against risks inherent in the use of chemical compounds, and complies with regulations, industry group recommendations and opinions issued by scientific committees in this field. The Group is constantly seeking to anticipate changes in this area, drawing on its employees’ expertise to produce only the safest products.

The Group’s experts regularly take part in working groups set up by domestic and European authorities and play a very active role within industry groups. Their ongoing monitoring of changes in scientific knowledge and regulations has regularly led LVMH to prohibit the use of certain substances and make efforts to reformulate some of its products.

The Group’s Maisons have customer relations departments that analyze customer complaints, including those relating to adverse effects.

The Perfumes and Cosmetics business group has a dedicated team of specialists who provide the Maisons with access to a European network of healthcare professionals able to quickly respond to help consumers experiencing side effects. Such post-market surveillance makes it possible to explore new avenues of research and constantly improve the quality and tolerance with respect to the Group’s products. The Maisons in this business group comply with the most stringent international safety laws, including the EU regulation on cosmetic products. Their products must meet very strict internal requirements covering development, quality, traceability and safety.

Maisons in the Fashion and Leather Goods, and Watches and Jewelry business groups abide by the LVMH Restricted Substances List, an in-house standard that prohibits or restricts the use of certain substances in products placed on the market, as well as their use by suppliers. This standard, which applies to all raw materials used by the Maisons, goes beyond global regulatory requirements and is regularly updated in response to ongoing monitoring of scientific developments. In 2019, LVMH joined the ZDHC (Zero Discharge of Hazardous Chemicals) trade association, which aims to promote best practices concerning the use of dangerous substances and the quality of discharged wastewater at textile and leather manufacturing sites. In 2021, the Group and the Fashion and Leather Goods Maisons worked on rolling out the program and set targets for 2023, as described in §3.2.3 “Protecting water resources” in the “Environment and sustainability” section.

To help suppliers eliminate the substances on this list, the Group’s Environment Department has produced specific technical guides suggesting alternatives. Training is regularly offered on this subject.

Another in-house tool, the LVMH Testing Program, reinforces the control system of Maisons in the Fashion and Leather Goods business group, allowing them to test the highest-risk substances for different materials at nine partner laboratories.

Moët Hennessy: An ambassador for responsible consumption of wines and spirits

The Group’s Wines and Spirits Maisons promote the art of enjoyment of their drinks and invite their consumers to learn about their heritage and expertise. They are also fully aware that their main responsibility to society is to prevent risks relating to harmful use of alcohol.

Moët Hennessy has made a commitment to promote moderate consumption and responsible choices with regard to alcohol among its employees and consumers.

The Maisons need to help consumers who are old enough to consume the Group’s products to make responsible choices when drinking, such as deciding whether to drink or not, choosing when to drink and how much to drink.

The Group is committed to raising awareness and educating its consumers, customers and employees about risky behaviors such as excessive alcohol consumption or driving under the influence as a priority.

Some people should not consume alcohol at all. Moët Hennessy has adopted a firm stance against alcohol consumption amongst minors and also believes that pregnant women should be better informed about the risks of alcohol consumption for their child.

Moët Hennessy fully supports the World Health Organization’s goal of reducing harmful use of alcohol by 10% worldwide by 2025.

In October 2021, Moët Hennessy joined the IARD (International Alliance for Responsible Drinking), a group bringing together leading names from the beers, wines and spirits industry, dedicated to promoting responsible consumption. Moët Hennessy is committed to respecting the standards set by the IARD in its digital marketing practices, in the information shared with consumers – particularly in its product labeling – and on its e-commerce sites, and to working with the profession as a whole to take the concept of responsible consumption even further.
Action plans will be rolled out between 2021 and 2025 and will be based on prior commitments.

For example, Moët Hennessy developed a Responsible Marketing & Communications Code more than 15 years ago. This code has been regularly updated and recently incorporated the International Alliance for Responsible Drinking’s digital principles and principles for digital influencers. Marketing teams are trained on the basis of this code, which is also systematically shared with external agencies. In addition, Moët Hennessy is a member of the World Federation of Advertisers’ Responsible Marketing Pact, an industry standard setting out practices to prevent exposing minors to alcohol marketing.

Moët Hennessy’s company culture is based on moderation and responsible enjoyment of its products. Its employees are responsible and exemplary ambassadors of this.

### 5.4 Ongoing efforts to attract and support talent

The pursuit of LVMH’s strategy of growth, international expansion and digitalization relies on the Group’s ability to identify talented individuals with the skills it needs and attract them in a highly competitive environment. In particular, the highly specific and demanding nature of the luxury goods industry means the Group must recruit staff with outstanding craftsmanship. Promoting the Group’s business lines, passing on skills and training the designers and craftspeople of the future are therefore key issues for LVMH.

This is why innovative recruitment initiatives, academic partnerships and professional education programs are key components of the Group’s human resources policy, detailed in the “Attracting and retaining talent” section.

### 5.5 Constant focus on employee inclusion and fulfillment

LVMH is constantly seeking to create conditions that enable its employees to realize their full potential and succeed within the business. At a time of shifting career expectations, it is vitally important to foster employees’ aspirations and their fulfillment and to promote diversity.

This is why workplace well-being, career guidance, reducing gender inequality, promoting employment for people with disabilities and retaining older employees are all priorities within the Group’s human resources policy, detailed in the “Attracting and retaining talent” section.

### 5.6 Integrity in business

LVMH requires its employees and partners to conduct their work with exemplary integrity. Any lapse in prevention and detection in its operations, or any practices contrary to applicable regulations, may bring serious harm to LVMH’s reputation, cause disruptions in its business activities, and, in certain cases, expose the Group to various types of administrative and judicial penalties (such as fines, withdrawals of authorizations or lawsuits filed against employees or senior executives).

Due to their extraterritorial aspects, laws relating to the prevention of bribery and other forms of financial crime as well as policies regarding international sanctions are giving rise to enforcement actions and the announcement of judicial and financial penalties.

The Group’s senior executives may be held personally liable for any breach of their obligation to put in place adequate prevention and detection measures, possibly even in the absence of any noted illicit activity.

Given the global reach of its business, LVMH has operations in many countries around the world, including countries with a level of maturity in business ethics deemed unsatisfactory by leading international rankings.

The Group pays taxes in the countries and regions where it operates, and endeavors to fully comply with all its tax obligations. The risk management measures taken in connection with its tax policy are described in §1.3.2 of the “Financial and operational risk management and internal control” section.
Due to the nature of its business model, the Group does not enter into any significant contracts with governments. Consequently, it is not exposed to the corruption risks associated with public procurement procedures.

However, LVMH’s business activities involve contacts with government agencies, including for the granting of various authorizations and permits. Similarly, out of a willingness to discuss and cooperate with authorities and decision-makers, LVMH contributes to public debate in countries where to do so is authorized and relevant. The Group’s contributions in the public space always abide by the laws and regulations applicable to the institutions and organizations in question, and LVMH is registered as an interest representative where its activities so require.

Furthermore, the Group may be exposed, in the same way as any other private company, to the risk of corruption in its dealings with private business partners.

Risk-mapping exercises (described in §4 “Risk identification”) were carried out at the level of the Group’s headquarters and the Maisons to identify and prioritize these risks.

Given the diversity of the LVMH ecosystem and its decentralized organizational model, Maisons have developed their own tools and policies adapted to their specific business contexts. At a central level, the Ethics & Compliance Department develops and coordinates the rollout of cross-departmental initiatives to strengthen compliance programs already in place within the Group and ensure their consistency.

Communications, awareness and training efforts aiming to improve employee vigilance are implemented, as well as the sharing of experiences with these subjects within the Group. Common rules, procedures and tools are also in place to facilitate day-to-day detection and prevention of prohibited conduct by operational staff.

**Communications, awareness, training and intra-Group experience sharing**

Serving as the central information resource for the Group’s ethics and compliance policy, the LVMH Ethics & Compliance Intranet provides access for all employees to a set of documents, tools and information relating to business ethics.

Specific information is provided by the relevant human resources departments to newly hired employees concerning the Code of Conduct and the whistleblowing system. Information on the Code of Conduct and the whistleblowing system is also shared on the Group’s website. An online training tool, available to all employees on the Ethics & Compliance Intranet, is designed to help them understand and better assimilate the rules, practices and values presented in the LVMH Code of Conduct. This module is already available in around ten languages.

The Group’s Maisons have access to a set of documentary resources (summary reports, examples of best practices, awareness videos, guides, etc.) that is updated on a regular basis by the Group’s Ethics & Compliance Department.

Since 2019, each Maison has reported to the Group’s Ethics & Compliance Department on progress made on its compliance program via a detailed reporting questionnaire.

Various training and awareness initiatives are carried out with central functions and at the Maisons. The following initiatives in 2021 are some examples:

- the Group’s Ethics & Compliance Department organized a number of anti-corruption training webinars that were attended by over 450 head office staff;
- Parfums Christian Dior took steps to raise awareness among its senior managers about preventing corruption, organizing face-to-face small group interactive training sessions;
- TAG Heuer launched a business ethics training program via an e-learning app. This training, mandatory for all employees worldwide, covers the fight against corruption, the prevention of conflicts of interest and requirements linked to industry initiatives to which the Maison has signed up (Kimberley Process, Responsible Jewellery Council);
- Sephora China restated the ethics and compliance requirements incumbent on its business partners during its Landlord Day and Brand Day events, which attracted over 500 participants;
- Perfumes Loeve produced a video in which its Executive Committee members present the Group’s Code of Conduct and guidelines. Special attention was paid to conflicts of interest, and gifts and entertainment practices (a mobile app for recording gifts and entertainment was launched).

In addition to the training and awareness initiatives implemented by the Group and its Maisons, the Group has also developed a specific 45-minute online anti-corruption training module, which is available to all Maisons and serves as a common core that supplements existing training materials. Since it was launched in late 2018, the module has been completed by several thousand employees throughout the Group. This module has been translated into six more languages to expand employee awareness of its content, and more than 11,000 of them successfully completed this training in 2021.

Specifically, this module:
- reiterates LVMH’s zero-tolerance policy on corruption;
- expresses the Group Chairman and Chief Executive Officer and Group Managing Director’s commitment to promoting exemplary, responsible behavior;
- defines and illustrates the notions of corruption and influence-peddling;
- provides an overview of the policies, governance and tools involved in the Group’s anti-corruption compliance program;
illustrates the negative consequences of corruption on civil society and companies;

- provides information on anti-corruption laws in force around the world and obligations for businesses in combating corruption;
- introduces the concept of due diligence on third parties to combat corruption and the main items to check;
- includes a number of case studies and questionnaires to ensure that employees have fully understood the key concepts involved.

On December 17, 2021, the President of the Paris Judicial Tribunal approved the Judicial Public Interest Agreement (CJIP, convention judiciaire d'intérêt public) proposed to LVMH, under the terms of which the Group agreed to pay a public interest fine of 10 million euros.

Rules, procedures and tools

The LVMH Code of Conduct defines and illustrates prohibited behaviors, in particular those that may constitute corruption or influence-peddling. It reaffirms the Group’s zero-tolerance stance on this issue.

In addition to the LVMH Code of Conduct, the Group has internal guidelines, a set of documents that apply to all entities, intended to be used as a reference guide to help employees adopt appropriate behaviors in various areas to do with business ethics. In particular, these principles cover the following:

- preventing corruption and influence-peddling, including basic definitions of these concepts and information about how to identify various suspicious behaviors against which staff should be on their guard;
- mandatory rules on gifts and entertainment;
- preventing money laundering, including information on cash payment limits and formalities for reporting large payments;
- rules for preventing, reporting and resolving conflicts of interest; in this regard, an annual conflict of interest reporting campaign is undertaken within the governing bodies of the Group and the Maisons;
- use of assets belonging to the Group and the Maisons, including the fact that such assets are made available only for a temporary period and the requirement that they be used in a professional and conscientious manner;
- loans of clothes and accessories by Maisons to employees or individuals outside the Group;
- Group policy on travel and security, which includes rules on authorization of travel and payment of travel expenses.

These internal guidelines help employees recognize risky situations and act responsibly and appropriately, by drawing their attention to a number of key points to watch out for. It includes a number of everyday examples to illustrate how to react in risky situations.

These guidelines provide a common core that can be adjusted to fit each entity’s specific situation.

In addition to these Group-level reference frameworks, the Maisons have adopted their own rules and communication channels. Christian Dior Couture, for example, launched a compliance portal for its operations in France during the year. Its features include the ability for each employee to confirm they are familiar with internal policies and to report online any conflict of interest with which they are faced.

LVMH’s internal control framework includes a set of minimum requirements for ethics and compliance, which are checked through self-assessments and audits at the Group’s various entities (as described in the “Financial and operational risk management and internal control” section).

These requirements notably include the anti-corruption assessment of third parties, in accordance with a risk-based approach. A summary document in a question-and-answer format was made available to the Maisons via the Ethics & Compliance Intranet. A tool has been rolled out at the holding company and certain Group Maisons to automate a portion of the assessment and risk management work, by way of a platform allowing for the analysis of questionnaires and continuous checks of various monitoring lists.

In addition to the usual existing communication and warning channels within the Group and the Maisons, LVMH has set up a centralized whistleblowing system (https://alertline.lvmh.com), available in around ten languages to all the Group’s Maisons, to collect and process reports from any employee or outside stakeholder concerning infringements or serious risks of infringement of laws, regulations, the provisions of the LVMH Code of Conduct and other principles, guidelines and internal policies.

The system includes coverage of the following behaviors:

- corruption and influence-peddling;
- money laundering, fraud and falsification of accounting records;
- embezzlement;
- anti-competitive practices;
- data protection breaches;
- discrimination, harassment, violence and threatening behavior;
- infringements of workers’ rights and labor law, illegal employment;
- infringements of occupational health and safety regulations;
- violation of environmental protection laws.
Alerts handled through dedicated whistleblowing systems can be used to help improve risk identification and prevention procedures, as part of a continuous improvement approach.

The Group’s whistleblowing system gave rise to 252 reports in respect of fiscal year 2021. Most of these reports related to human resources matters.

5.7 Responsible management of personal data

In order to offer their customers exceptional products and experiences that meet their expectations, the LVMH group’s Maisons must have access to high-quality customer data, and are committed to ensuring that all data collected is kept secure.

In an era of innovation for the LVMH group – which is moving ahead with an ambitious digital strategy, resolutely focused on its customers and their aspirations – every Maison in the LVMH group takes steps to comply with the regulations applicable to personal data, including the General Data Protection Regulation (GDPR).

Ensuring full compliance with personal data protection regulation requires adequate governance arrangements to be implemented within the LVMH group. Accordingly, each Group Maison has appointed a Data Protection Officer (DPO) to ensure that its operations are compliant, with support from the legal and cybersecurity departments and in close cooperation with staff in a range of roles (including IT, digital, marketing and HR).

This also means building and promoting a personal data protection culture that permeates all the Group’s business lines and activities as well as taking into account technical and methodological developments. To this end, LVMH and its Maisons regularly hold in-person and/or e-learning training and awareness sessions on personal data protection-related issues. The privacy policies for customers and employees of the LVMH group’s Maisons were updated to inform these individuals of their rights and obligations regarding personal data, pursuant to the principle of transparency required by the GDPR.

A strict cybersecurity policy is also applied within the Group to ensure a fresh customer experience without compromising on data security, privacy, integrity or availability requirements. Under this policy, LVMH and its Maisons monitor not only the security of their own information systems but assess the security levels of the products and services offered by the third-party providers used by LVMH and its Maisons. Providers that have access to LVMH and/or its Maisons’ data are assessed to ensure that the technical and organizational measures they have implemented provide a level of security that is sufficient and well suited to their work. Specific cybersecurity incident prevention, detection and response policies are also applied within the Group.

If employees fail to abide by rules laid down in the Code of Conduct, the guiding principles or, more generally, the Rules of Procedure (or equivalent document) of their employing Maison, the Group will take appropriate steps to put an end to the infringement in question, including appropriate disciplinary sanctions proportionate to the severity of the infringement, in accordance with the provisions of the Rules of Procedure (or equivalent document) and applicable laws and regulations.

As a general rule, projects carried out by LVMH and/or its Maisons must complete a study covering any personal data protection and security-related issues (Security and Privacy by Design). They must ensure that only personal data that is necessary for the project’s purposes is actually collected and processed (Privacy by Default) and that any data protection-related impact analyses that need to be carried out have been identified. From a data security standpoint, a risk analysis is carried out and an action plan drawn up incorporating technical, organizational and contractual measures to address the risks identified.

To ensure a consistent, effective approach, a data protection policy is proposed to all Maisons in order to provide them with a common framework of rules and recommendations, helping ensure that appropriate measures are taken to protect personal data within the LVMH group, in compliance with applicable regulations.

This policy defines a Group compliance program on personal data protection, aimed at putting in place clear and transparent governance arrangements to manage issues concerning data protection, together with a range of common directives, bodies and processes. Sample data processing records, impact analyses, privacy notices, security questionnaires and personal data clauses to be added to contracts signed with subcontractors who process personal data are also provided to the Maisons by the Group, which each Maison then adapts to its own context.

The LVMH group also has Binding Corporate Rules (BCR) approved by France’s Commission Nationale de l’Informatique et des Libertés (CNIL), which govern international transfers within the LVMH group of the personal data of employees and job candidates.

An annual audit and assessment campaign is run as part of internal control or the Maisons’ internal audit work, in order to assess compliance with their personal data protection obligations.

Lastly, communities to share experience and exchange ideas – made up of the DPOs and their local representatives as well as the heads of security and legal directors of the Group’s Maisons – meet regularly to discuss shared issues related to personal data protection, with the goal of continuously improving practices in this area.
6. INDEPENDENT VERIFIER’S REPORT ON THE CONSOLIDATED STATEMENT OF NON-FINANCIAL PERFORMANCE

To the Shareholders’ Meeting,

In our capacity as an Independent Verifier accredited by COFRAC (Accreditation No. 3-1681; scope of accreditation available at www.cofrac.fr) and belonging to the network of a Statutory Auditor of your Company (hereinafter “entity”), we hereby present our report on the consolidated statement of non-financial performance for the fiscal year ended December 31, 2021 (hereinafter “Statement”), as set out in the Management Report pursuant to the provisions laid down in Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code.

1. Responsibility of the entity

It is the Board of Directors’ responsibility to prepare a Statement compliant with legal and regulatory requirements, including an overview of the business model, a description of key non-financial risks and an overview of the policies adopted in light of those risks, together with the results of those policies, including key performance indicators.

The Statement was prepared by applying the entity’s procedures (hereinafter “Guidelines”), the significant components of which are set out in the Statement and are available on request from your Group’s Environment and Human Resources Departments.

2. Independence and quality control

Our independence is defined by the provisions of Article L. 822-11-3 of the French Commercial Code and the code of ethics of our profession. In addition, we have implemented a quality control system, including documented policies and procedures designed to ensure compliance with applicable laws and regulations, ethical standards and professional guidelines.

3. Responsibility of the Independent Verifier

It is our responsibility, on the basis of our work, to express a reasoned opinion reflecting a limited assurance conclusion that:

• the Statement complies with the requirements laid down in Article R. 225-105 of the French Commercial Code;

• the information provided is fairly presented in accordance with Point 3 of Sections I and II of Article R. 225-105 of the French Commercial Code, namely the results of policies, including key performance indicators, and actions in relation to key risks, hereinafter “Information”.

It is also our responsibility to express, at the entity’s request and outside the scope of our accreditation, a conclusion of reasonable assurance that the information selected by the entity and identified by the symbol ✓ in Appendix 1 (hereinafter “Selected Environmental and Social Information”) was prepared, in all material respects, in accordance with the Guidelines.

It is not our responsibility, however, to express an opinion on whether the entity complies with other applicable legal and regulatory provisions, notably concerning the vigilance plan and the prevention of corruption and tax evasion, or whether products and services comply with applicable regulations.

Reasoned opinion on the compliance and fair presentation of the Statement

Nature and scope of work

The work described below was carried out in accordance with the provisions of Articles A. 225-1 et seq. of the French Commercial Code, the professional guidelines of the French National Institute of Statutory Auditors (Compagnie Nationale des Commissaires aux Comptes) applicable to this engagement, and ISAE 3000:

• we familiarized ourselves with the business of all entities falling within the scope of consolidation and the key risks;

• we assessed the suitability of the Guidelines in terms of their relevance, completeness, reliability, objectivity and comprehensible nature, taking the sector’s best practices into consideration, where applicable;
we checked that the Statement covers each category of information laid down in Section III of Article L. 225-102-1 of the French Commercial Code on workforce-related and environmental issues, as well as the information required by the second paragraph of Article L. 22-10-36 regarding compliance with human rights and the prevention of corruption and tax evasion;

• we checked that the Statement provides the information required by Section II of Article R. 225-105 of the French Commercial Code wherever relevant with respect to the key risks and, where applicable, includes an explanation of the reasons for the absence of information required by the second paragraph of Article L. 225-102-1 III of the French Commercial Code;

• we checked that the Statement provides an overview of the business model and a description of the key risks associated with the business of all entities falling within the scope of consolidation, including, where relevant and proportionate, risks arising from business relationships, products and services as well as policies, actions and results, including key performance indicators related to key risks;

• we consulted source documents and conducted interviews to:
  — assess the process used to select and validate key risks, as well as the consistency of results, including key performance indicators related to the key risks and policies presented, and
  — corroborate what we considered the most important qualitative information (actions and results) set out in Appendix 1.

For all risks, our work was carried out at the level of the consolidating entity and on a selection of the entities listed below:

  • for environmental risks: Wines and Spirits: MHCS: Maison and sites (Epernay, France); Hennessy: Maison and sites (Cognac, France); Glenmorangie site (Tain, Scotland); Chandon Argentina: sites (Argentina); Perfumes and Cosmetics: Parfums Christian Dior Maison and site (Saint-Jean-de-Braye, France), Guerlain Maison and site (Chartres, France); Fashion and Leather Goods: Loro Piana site (Quarona, Italy), Christian Dior Couture Maison (France) and site (Lugagnano Val d’Arda, Italy), Fendi Maison (Italy), Louis Vuitton Malletier Maison and stores (France); Watches and Jewelry: Bvlgari Maison and site (Valenza, Italy), TAG Heuer site (Chaux-de-Fonds, Switzerland); Selective Retailing: Le Bon Marché (France), DFS stores (Hong Kong), Sephora Europe Midlle East Maison and stores (France); DFS: Other activities: Belmond hotels (Cipriani, Italy, and Das Cataratas, Brazil),

  • for workforce-related risks: Wines and Spirits: MHCS (France); Perfumes and Cosmetics: Guerlain (France); Fashion and Leather Goods: Manufacture de Maroquinerie et Accessoires Louis Vuitton (Spain), Fendi (Italy), Société des Ateliers Louis Vuitton (France); Watches and Jewelry: Hublot (Switzerland); Selective Retailing: Sephora (China), Segep (France); Other activities: Belmond Copacabana Palace (Brazil),

  • for social risks:
    - responsible supply chains: Wines and Spirits: MHCS (France), Hennessy (France); Perfumes and Cosmetics: Parfums Christian Dior (France), Guerlain (France); Fashion and Leather Goods: Fendi (Italy), Christian Dior Couture (France), Louis Vuitton Malletier (France); Watches and Jewelry: Tiffany & Co. (United States), Bvlgari (Italy); Selective Retailing: Sephora SA (France), Le Bon Marché (France),
    - personal data protection: Le Parisien (France), Moët Hennessy (France),
    - compliant business practices: Sephora SA (France), Parfums Christian Dior (France);

• we checked that the Statement covers the scope of the consolidated Group, i.e. all entities falling within the scope of consolidation in accordance with Article L. 233-16 of the French Commercial Code, within the limits set out in the Statement;

• we reviewed the internal control and risk management procedures put in place by the entity and assessed the collection process aimed at ensuring that the Information is complete and fairly presented;

• for key performance indicators and those other quantitative results we considered the most significant, set out in Appendix 1, we carried out the following:
  — analytical procedures that consisted in checking that all data collected had been properly consolidated, and that trends in that data were consistent,
  — detailed, sample-based tests that consisted in checking that definitions and procedures had been properly applied and reconciling data with supporting documents. This work was carried out on a selection of contributing entities listed above and covers between 9.1% and 79% of the consolidated data selected for these tests (9.1% of the workforce, 46% of energy consumption and 61% of certified supplies);

• we assessed the Statement’s overall consistency with our knowledge of all the entities falling within the scope of consolidation.

We consider that the work we performed using our professional judgment allow us to formulate a limited assurance conclusion; an assurance of a higher level would have required more extensive verification work.
Means and resources

Our work was undertaken by a team of fourteen people between September 2021 and February 2022, for a period of fourteen weeks. We conducted around fifteen interviews with those responsible for preparing the Statement, notably representing Executive Management and the Administration & Finance, Risk Management, Ethics & Compliance, Human Resources, Environment and Purchasing Departments.

Conclusion

On the basis of our work, we found no material misstatements that might have led us to believe that the consolidated statement of non-financial performance is not compliant with applicable regulatory requirements or that the Information, taken as a whole, is not fairly presented, in accordance with the Guidelines.

Reasonable assurance report on the Selected Information

Nature and scope of work

Concerning the Selected Information identified by the symbol ✓ in Appendix 1, we carried out the same type of work as set out in Section 1 above for what we considered the most important key performance indicators and other quantitative results, though in greater depth, particularly as regards the extent of tests.

The sample selected represents on average 47% of the Selected Environmental Information and 70% of the Selected Social Information. We consider that this work allows us to express a reasonable assurance conclusion on the Selected Information.

Paris-La Défense, February 8, 2022

The Independent Verifier

French original signed by

EY & Associés

Éric Duvaud

Sustainable Development Partner

This is a free translation into English of the Independent Verifier’s report issued in French and is provided solely for the convenience of English-speaking users. This report should be read in conjunction with, and construed in accordance with, French law and professional auditing standards applicable in France.
Appendix 1: Information considered the most important

**Workforce-related information**

**Quantitative information**
(including key performance indicators)
- Breakdown of the workforce as of December 31, 2021 by gender and job category
- Recruitment on permanent contracts from January 1 to December 31, 2021 (breakdown by gender)
- Turnover among employees on permanent contracts from January 1 to December 31, 2021 (total, voluntary and involuntary)
- Proportion of employees on permanent contracts trained between January 1 and December 31, 2021 by job category
- Average number of days’ training for employees on permanent contracts
- Absence rate by reason
- Work-related accident frequency rate
- Work-related accident severity rate

**Qualitative information**
(actions and results)
- Workplace health and safety
- Inclusion and diversity among employees
- Implementing the employer policy and attracting and retaining students and recent graduates
- Training and support for employees throughout their careers
- Constructive labor relations

**Environmental information**

**Quantitative information**
(including key performance indicators)
- Proportion of manufacturing sites certified ISO 14001 (%)
- Total energy consumption (MWh)
- Energy-related greenhouse gas emissions - Scope 1 and 2 (metric tons of CO₂ equivalent)
- Greenhouse gas emissions generated by outbound transport - Scope 3 (metric tons of CO₂ equivalent)
- Total water consumption for process requirements (m³)
- Total water consumption for agricultural requirements (m³)
- Total waste produced (metric tons)
- Waste recovery rate (%)
- Total packaging that reaches customers (metric tons)

**Qualitative information**
(actions and results)
- Organization of the environmental approach, particularly governance and commitments, including the LIFE 360 program
- Environmental impact of packaging and monitoring of the LIFE “Creative Circularity” target
- Combating climate change and monitoring the LIFE “Climate” target

**Social information**

**Quantitative information**
(including key performance indicators)
- Proportion of grape supplies, eaux-de-vie and still wines (in kg), from the Group’s own vineyards or from purchases, with sustainable winegrowing certification (%)
- Proportion of supplies of palm oil, palm kernel oil and their derivatives (in kg) certified RSPO Mass Balance or Segregated (%)
- Proportion of sheep and cow leather supplies (in m²) sourced from LWG-certified tanneries (%)
- Proportion of exotic leather (crocodile) supplies (number of skins) sourced from LWG-certified tanneries (%)
- Proportion of gold supplies (in kg) certified RJC CoC
- Proportion of gold supplies (in kg) sourced from RJC CoP-certified suppliers
- Proportion of diamond supplies (in carats) sourced from RJC CoP-certified suppliers
- Proportion of certified cotton supplies (in metric tons) (%)
- Proportion of certified fur supplies (mink and fox) (in kg) (%)
- Proportion of certified sheep’s wool (merino and other species) and cashmere (in kg) (%)
- Number of social and/or environmental audits carried out on suppliers and subcontractors

**Qualitative information**
(actions and results)
- Environmental standards applied to the supply chain and monitoring of the LIFE “Traceability” and “Biodiversity” targets
- Implementation of the Charter on Working Relations with Fashion Models and Their Well-Being
- Supplier assessment and support
- Management of personal data
- Business conduct and ethics
7. CROSS-REFERENCE TABLES

7.1 Statement of non-financial performance

Like any other economic actor, the LVMH group is exposed to a number of non-financial risks that may affect its performance, cause harm to its reputation, and impact its stakeholders and/or the environment. The following risks have been classified by representatives of the Group’s central functions and Executive Management as “key risks” in light of the Group’s activities (see §4 of the “Ethics and responsibility” section):

- impact on ecosystems and depletion of natural resources;
- setting up and maintaining responsible supply chains;
- safeguarding health and safety at work;
- loss of key skills and expertise;
- implementation of a policy to promote employee inclusion and fulfillment;
- shortcomings in the implementation of personal data protection rules;
- shortcomings in the implementation of business practice compliance arrangements.

LVMH is committed to addressing each of these risks by putting the appropriate policies in place. The cross-reference tables below provide a summary presentation of the information constituting the Group’s statement of non-financial performance, as required by Article L. 225-102-1 of the French Commercial Code, indicating for each item the location in this Management Report where further details may be found. They include cross-references to the specific disclosures required by this article with regard to respect for human rights and measures to combat corruption, climate change, and discrimination.

The remaining disclosures required by this article may be found in the following sections:

- with regard to the Group’s business model, in the sections entitled “The LVMH business model” and “Business overview, highlights and outlook” in the introduction to this report;
- with regard to the presentation of the workforce for each business group and geographic region, in §1.3 of the “Attracting and retaining talent” section;
- with regard to collective bargaining agreements signed at the level of companies across the Group, in §3.2 of the “Attracting and retaining talent” section;
- with regard to efforts to promote the circular economy, in §2 of the “Environment and sustainability” section;
- with regard to combating food waste, in §2.2.3 of the “Environment and sustainability” section;
- with regard to social commitments to promote sustainable development, apart from the topics covered by the cross-reference tables below in terms of social consequences, respect for human rights and the environment, in §1 and §2 of the “Outreach and giving back” section;
- with regard to protecting animal welfare, in §3 of the “Environment and sustainability” section;

Lastly, given the nature of the Group’s business activities, topics relating to the fight against food insecurity or efforts to promote responsible and sustainable food production as well as fair food systems are not discussed in this Management Report.
### 7.1.1 Social consequences

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<thead>
<tr>
<th>Risk</th>
<th>Policies</th>
<th>Results</th>
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| Loss of key skills and expertise | - Academic partnerships ([§2.3](#) of the “Attracting and retaining talent” section)  
- Institut des Métiers d’Excellence ([§2.3](#) of the “Attracting and retaining talent” section)  
- Employee training and support ([§3.1](#) of the “Attracting and retaining talent” section)  
- Specific initiatives to promote training and employment for people with disabilities ([§2.4](#) of the “Attracting and retaining talent” section)  
- Support for high-potential female employees to help them move into key positions ([§2.4](#) of the “Attracting and retaining talent” section) | - Joiners by business group and geographic region ([§2.1](#) of the “Attracting and retaining talent” section)  
- Invested in training ([§3.1](#) of the “Attracting and retaining talent” section)  
- Internal mobility data ([§3.1](#) of the “Attracting and retaining talent” section)  
- Awards, recognition and rankings obtained as an employer ([§2.1](#) of the “Attracting and retaining talent” section) |

| Health and safety issues faced in the Group’s business activities | - LVMH Code of Conduct ([§2.2](#) of the “Ethics and responsibility” section)  
- LVMH Alert Line whistleblowing system ([§5.6](#) of the “Ethics and responsibility” section)  
- Charter on Working Relations with Fashion Models ([§2.2](#) of the “Ethics and responsibility” section)  
- Investments in health, safety and security ([§3.2](#) of the “Attracting and retaining talent” section)  
- Employee training in health, safety and security ([§3.2](#) of the “Attracting and retaining talent” section)  
- Social audits of suppliers and subcontractors including a health and safety dimension ([§5.2](#) of the “Ethics and responsibility” section)  
- Measures relating to the use of chemicals and cosmetovigilance ([§5.3](#) of the “Ethics and responsibility” section)  
- Promoting responsible consumption of wines and spirits ([§5.3](#) of the “Ethics and responsibility” section) | - Breakdown, frequency and severity of work-related accidents ([§3.2](#) of the “Attracting and retaining talent” section)  
- Data relating to social audits that include a health and safety dimension ([§5.2](#) of the “Ethics and responsibility” section)  
- Training for employees and suppliers focusing on the LVMH Restricted Substances List ([§5.3](#) of the “Ethics and responsibility” section) |

| Implementation of a policy of employee inclusion and fulfillment (aspects related to fulfillment at work) | - LVMH Code of Conduct ([§2.2](#) of the “Ethics and responsibility” section)  
- LVMH Alert Line whistleblowing system ([§5.6](#) of the “Ethics and responsibility” section)  
- DARE program ([§3.1](#) of the “Attracting and retaining talent” section)  
- LVMH Global Pulse Survey ([§3.1](#) of the “Attracting and retaining talent” section)  
- LVMH Heart Fund ([§3.2](#) of the “Attracting and retaining talent” section)  
- Specific training for managers ([§3.1](#) of the “Attracting and retaining talent” section)  
- Group Works Council and SE Works Council ([§3.2](#) of the “Attracting and retaining talent” section) | - Number of meetings held by employee representative bodies in 2021 ([§3.2](#) of the “Attracting and retaining talent” section)  
- Endowment and number of support requests received in connection with the LVMH Heart Fund ([§3.2](#) of the “Attracting and retaining talent” section) |
### 7.1.2 Respect for human rights

<table>
<thead>
<tr>
<th>Risk</th>
<th>Policies</th>
<th>Results</th>
</tr>
</thead>
</table>
| Setting up and maintaining responsible supply chains (aspects relating to respect for human rights) | - LVMH Code of Conduct (§2.2 of the “Ethics and responsibility” section)  
- Supplier Code of Conduct (§2.2 of the “Ethics and responsibility” section)  
- Charter on Working Relations with Fashion Models (§2.2 of the “Ethics and responsibility” section)  
- LVMH Alert Line whistleblowing system (§5.6 of the “Ethics and responsibility” section)  
- Risk mapping by the Group (§4 of the “Ethics and responsibility” section)  
- Social audits of suppliers and subcontractors (§5.2 of the “Ethics and responsibility” section)  
- Collection of information on suppliers’ social and ethical performance via the EcoVadis platform (§5.2 of the “Ethics and responsibility” section)  
- Participation in multi-party initiatives covering high-risk areas (§5.2 of the “Ethics and responsibility” section) | - Breakdown of suppliers and audits (§5.2 of the “Ethics and responsibility” section)  
- Data on combined audits and audits examining only social aspects carried out at suppliers (§5.2 of the “Ethics and responsibility” section)  
- Proportion of follow-up audits (§5.2 of the “Ethics and responsibility” section)  
- Proportion of suppliers not meeting the Group’s standards (§5.2 of the “Ethics and responsibility” section)  
- Number of contracts terminated following audits (§5.2 of the “Ethics and responsibility” section)  
- Number of business relationships not initiated following audits (§5.2 of the “Ethics and responsibility” section) |
| Implementation of a policy of employee inclusion and fulfillment (aspects relating to the fight against discrimination and the promotion of diversity) | - LVMH Code of Conduct (§2.2 of the “Ethics and responsibility” section)  
- LVMH Alert Line whistleblowing system (§5.6 of the “Ethics and responsibility” section)  
- Recruitment Code of Conduct (§2.2 of the “Ethics and responsibility” section)  
- Specific training for recruiters (§2.4 of the “Attracting and retaining talent” section)  
- Independent review of hiring practices (§2.4 of the “Attracting and retaining talent” section)  
- Specific initiatives to promote training and employment for people with disabilities (§2.4 of the “Attracting and retaining talent” section)  
- Support for high-potential female employees to help them move into key positions (§2.4 of the “Attracting and retaining talent” section) | - Proportion of employees with disabilities (§2.4 of the “Attracting and retaining talent” section)  
- Proportion of women among joiners and in the Group’s workforce (§2.4 of the “Attracting and retaining talent” section) |
| Shortcomings in the implementation of personal data protection rules | - LVMH Code of Conduct (§2.2 of the “Ethics and responsibility” section)  
- Data protection policy (§5.7 of the “Ethics and responsibility” section) | - Creation of a network of Data Protection Officers (§5.7 of the “Ethics and responsibility” section) |
### 7.1.3 Environmental consequences

<table>
<thead>
<tr>
<th>Risk</th>
<th>Policies</th>
<th>Results</th>
</tr>
</thead>
</table>
| Business impacts on ecosystems and depletion of natural resources (including aspects relating to the fight against climate change) | - LVMH Environmental Charter (§1.1 and §1.2 of the “Environment and sustainability” section)  
- LVMH Environmental Charter (§1.1 and §1.2 of the “Environment and sustainability” section)  
- Combating climate change and the LVMH Carbon Fund (§5 of the “Environment and sustainability” section) | - Improvement in the Environmental Performance Index scores of product packaging for Perfumes and Cosmetics and Wines and Spirits companies (§2.2 of the “Environment and sustainability” section)  
- Accelerated and expanded rollout of sustainable and organic winegrowing (§3.1 of the “Environment and sustainability” section)  
- Certification of materials used in products (§3.1 of the “Environment and sustainability” section)  
- Amounts raised via the Carbon Fund and metric tons of carbon-equivalents via the innovative projects supported (§5.2 of the “Environment and sustainability” section)  
- Increase in the proportion of renewable energy in the Group’s energy mix (§5.2 of the “Environment and sustainability” section)  
- Implementation of an environmental management system at manufacturing sites (§2.1.4 and §2.2.4 of the “Environment and sustainability” section) |
| Setting up and maintaining responsible supply chains (environmental aspects) | - LVMH Code of Conduct (§2.2 of the “Ethics and responsibility” section)  
- Supplier Code of Conduct (§2.2 of the “Ethics and responsibility” section)  
- LVMH Environmental Charter (§1.1 and §1.2 of the “Environment and sustainability” section)  
- LiFE program and LiFE 360 targets (§1.1 and §1.2 of the “Environment and sustainability” section)  
- LVMH Alert Line whistleblowing system (§5.6 of the “Ethics and responsibility” section)  
- Collection of information on suppliers’ environmental performance via the EcoVadis platform (§5.2 of the “Ethics and responsibility” section)  
- Participation in multi-party initiatives covering high-risk areas (§5.2 of the “Ethics and responsibility” section) | - Data on environmental audits carried out at suppliers, both combined audits and audits examining only environmental aspects (§5.2 of the “Ethics and responsibility” section)  
- LiFE 360 program – “Biodiversity” target, particularly relating to supply chains for grapes, leather, skins and pelts, gemstones and precious metals, palm oil derivatives and regulated chemicals (§3.1 of the “Environment and sustainability” section) |
## 7.1.4 Fight against corruption

<table>
<thead>
<tr>
<th>Risk</th>
<th>Policies</th>
<th>Results</th>
</tr>
</thead>
</table>
| Shortcomings in the implementation of business practice compliance arrangements | - LVMH Code of Conduct (§2.2 of the “Ethics and responsibility” section)  
- Supplier Code of Conduct (§2.2 of the “Ethics and responsibility” section)  
- LVMH Alert Line whistleblowing system (§5.6 of the “Ethics and responsibility” section)  
- Group Ethics and Compliance Intranet site (§5.6 of the “Ethics and responsibility” section)  
- Corruption risk mapping (§4 and §5.6 of the “Ethics and responsibility” section)  
- Anti-corruption assessment of third parties (§5.6 of the “Ethics and responsibility” section)  
- Role of the Ethics & Compliance Department, officers and committees (§3 and §5.6 of the “Ethics and responsibility” section)  
- Internal guidelines (§5.6 of the “Ethics and responsibility” section)  
- Anti-corruption training (§5.6 of the “Ethics and responsibility” section)  
- Compliance rules included in the internal audit and control framework (§5.6 of the “Ethics and responsibility” section)  
- Report to the Ethics & Sustainable Development Committee of the Board of Directors (§5.6 of the “Ethics and responsibility” section) | - Number of reports made to the LVMH Alert Line (§5.6 of the “Ethics and responsibility” section)  
- Number of times the anti-corruption training module has been passed (§5.6 of the “Ethics and responsibility” section)  
- Number of Ethics & Compliance Officers (§5.6 of the “Ethics and responsibility” section) |
7.2 **Vigilance plan**

As a responsible, actively engaged corporate citizen on a global scale, the LVMH group strives to exert a positive influence on the communities, regions and countries where it operates and to minimize the potential adverse impacts of its activities, as well as those of its suppliers and subcontractors, for its stakeholders and the environment.

The cross-reference tables below provide a summary presentation of the information constituting the Group’s vigilance plan, as required by Article L. 225-102-4 of the French Commercial Code, indicating for each item the sections within this Management Report where further details may be found.

### 7.2.1 Human rights and fundamental freedoms

<table>
<thead>
<tr>
<th><strong>Group’s own operations</strong></th>
<th><strong>Suppliers’ and subcontractors’ activities</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Risk mapping</strong></td>
<td></td>
</tr>
<tr>
<td>– Risk mapping by the Group (§4 of the “Ethics and responsibility” section)</td>
<td>– Additional risk assessment for certain suppliers via the EcoVadis platform (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td></td>
<td>– Risk mapping by the Group (§4 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td><strong>Frequent risk assessments</strong></td>
<td></td>
</tr>
<tr>
<td>– Internal control and audit framework (§3.5 of the “Financial and operational risk management and internal control” section)</td>
<td>– Audits and follow-up audits (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td></td>
<td>– Corrective action plans following audits (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td><strong>Mitigation and prevention measures</strong></td>
<td></td>
</tr>
<tr>
<td>– Specific training for recruiters to prevent discrimination (§2.4 of the “Attracting and retaining talent” section)</td>
<td>– Supplier Code of Conduct (§2.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td>– Independent review of hiring practices (§2.4 of the “Attracting and retaining talent” section)</td>
<td>– Training for suppliers and buyers (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td></td>
<td>– Participation in multi-party initiatives covering high-risk areas (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td></td>
<td>– Supply chain certification targets (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td><strong>Whistleblowing systems</strong></td>
<td></td>
</tr>
<tr>
<td>– Centralized LVMH Alert Line whistleblowing system (§5.6 of the “Ethics and responsibility” section)</td>
<td>– LVMH Alert Line open to all stakeholders, including employees of suppliers and subcontractors (§5.6 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td></td>
<td>– Some Maisons have implemented measures to directly ask their suppliers’ employees about their working conditions (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td><strong>Follow-up and assessment measures</strong></td>
<td></td>
</tr>
<tr>
<td>– Regular updates to the risk analysis</td>
<td>– Remediation plans to address shortcomings identified during audits (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td></td>
<td>– Follow-up audits of suppliers (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
</tbody>
</table>
### 7.2.2 Individuals’ health and safety

<table>
<thead>
<tr>
<th>Risk mapping</th>
<th>Group’s own operations</th>
<th>Suppliers’ and subcontractors’ activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Risk mapping by the Group (§4 of the “Ethics and responsibility” section)</td>
<td>Risk mapping by the Group (§4 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td></td>
<td>Additional risk assessment for certain suppliers via the EcoVadis platform (§5.2 of the “Ethics and responsibility” section)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Frequent risk assessments</th>
<th>Group’s own operations</th>
<th>Suppliers’ and subcontractors’ activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Reference audit and control frameworks (§3.5 of the “Financial and operational risk management and internal control” section)</td>
<td>Audits and follow-up audits (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td></td>
<td>Accident analysis and prevention (§3.2 of the “Attracting and retaining talent” section)</td>
<td>Corrective action plans following audits (§5.2 of the “Ethics and responsibility” section)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mitigation and prevention measures</th>
<th>Group’s own operations</th>
<th>Suppliers’ and subcontractors’ activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>- LVMH Restricted Substances List (§5.3 of the “Ethics and responsibility” section)</td>
<td>Supplier Code of Conduct (§2.2 of the “Ethics and responsibility” section)</td>
<td></td>
</tr>
<tr>
<td>- LVMH Testing Program (§5.3 of the “Ethics and responsibility” section)</td>
<td>Training for suppliers and buyers (§5.2 of the “Ethics and responsibility” section)</td>
<td></td>
</tr>
<tr>
<td>- Promoting responsible consumption of wines and spirits (§5.3 of the “Ethics and responsibility” section)</td>
<td>Participation in multi-party initiatives covering high-risk areas (§5.2 of the “Ethics and responsibility” section)</td>
<td></td>
</tr>
<tr>
<td>- Third-party liability insurance (§2.3 of the “Financial and operational risk management and internal control” section)</td>
<td>Supply chain certification targets (§5.2 of the “Ethics and responsibility” section)</td>
<td></td>
</tr>
<tr>
<td>- Specific insurance policies in countries where work-related accidents are not covered by social security systems (§2.3 of the “Financial and operational risk management and internal control” section)</td>
<td>Assistance guides provided to suppliers for the elimination/substitution of chemicals whose use is restricted or prohibited by LVMH (§5.3 of the “Ethics and responsibility” section)</td>
<td></td>
</tr>
<tr>
<td>- Charter on Working Relations with Fashion Models (§2.2 of the “Ethics and responsibility” section)</td>
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<td></td>
</tr>
</tbody>
</table>

<table>
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<tr>
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<th>Suppliers’ and subcontractors’ activities</th>
</tr>
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<tbody>
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<td>- Centralized LVMH Alert Line whistleblowing system (§5.6 of the “Ethics and responsibility” section)</td>
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<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Follow-up and assessment measures</th>
<th>Group’s own operations</th>
<th>Suppliers’ and subcontractors’ activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Regular updates to the analysis of risk factors planned</td>
<td>Remediation plans to address shortcomings identified during audits (§5.2 of the “Ethics and responsibility” section)</td>
<td></td>
</tr>
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<td></td>
</tr>
</tbody>
</table>
### 7.2.3 Environment

<table>
<thead>
<tr>
<th>Risk mapping</th>
<th>Group's own operations</th>
<th>Suppliers' and subcontractors' activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>- Risk mapping by the Group ($1$ of the “Environment and sustainability” section)</td>
<td>- Identification of environmental priorities ($§4$ of the “Ethics and responsibility” section and $§1$ of the “Environment and sustainability” section)</td>
</tr>
<tr>
<td></td>
<td>- Additional risk assessment for certain suppliers via the EcoVadis platform ($§5.2$ of the “Ethics and responsibility” section)</td>
<td></td>
</tr>
<tr>
<td>Frequent risk</td>
<td>- Environment management system ($§2.1.4$ and $§2.2.4$ of the “Environment and sustainability” section)</td>
<td>- Audits and follow-up audits ($§5.2$ of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td>assessments</td>
<td></td>
<td>- Corrective action plans following audits ($§5.2$ of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td>Mitigation and</td>
<td>- LIFE 360 objectives ($§2$ to $§5$ of the “Environment and sustainability” section)</td>
<td>- Supplier Code of Conduct ($§2.2$ of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td>prevention measures</td>
<td>- Insurance for environmental damage ($§2.3$ and $§2.4$ of the “Financial and operational risk management and internal control” section)</td>
<td>- Training for suppliers and buyers ($§5.2$ of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Participation in multi-party initiatives covering high-risk areas ($§5.2$ of the “Ethics and responsibility” section)</td>
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<tr>
<td></td>
<td></td>
<td>- Supply chain certification targets ($§5.2$ of the “Ethics and responsibility” section)</td>
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<td>Whistleblowing</td>
<td>- Centralized LVMH Alert Line whistleblowing system ($§5.6$ of the “Ethics and responsibility” section)</td>
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<tr>
<td>systems</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Follow-up and</td>
<td>- Tracking achievement of LIFE 360 targets ($§2$ to $§5$ of the “Environment and sustainability” section)</td>
<td>- Remediation plans to address shortcomings identified during audits ($§5.2$ of the “Ethics and responsibility” section)</td>
</tr>
<tr>
<td>assessment measures</td>
<td>- Regular updates to the analysis of risk factors planned</td>
<td>- Follow-up audits of suppliers ($§5.2$ of the “Ethics and responsibility” section)</td>
</tr>
</tbody>
</table>