

# Code of Ethics

SEPHORA



Overview

Since its US launch in 1998, Sephora has always set out to inspire fearlessness in our communities and create a safe space where all employees can feel welcome. Through our continued expertise, innovation, and entrepreneurial spirit, Sephora quickly gained the trust of our customers and the reputation as one of the top beauty retailers in the world. It’s important that our employees are making ethical decisions that uphold Sephora’s reputation, principals, and values. Sephora’s Code of Ethics is designed as a guide to help navigate challenging situations and ensure that our decisions and behaviors are in line with Sephora’s values and policies. Each employee is responsible for conducting their business activities in compliance with these guidelines. As you read through Sephora’s Code of Ethics, we challenge you to think about how this applies to your role at Sephora.

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Our Values

Sephora’s commitment to ethical standards is reflected in our everyday actions. Our values are part of Sephora’s DNA and are the guidepost for every decision we make. It’s important to be mindful that the work you do and the decisions you make, at any level, is a direct representation of Sephora. By living Sephora’s values and promoting ethical behavior, we can help build trust with our customers, clients, brands, business partners, and the communities where we do business. Together we can continue to build a culture where we all **Belong to Something Beautiful**.

# DO THE RIGHT THING

## *Learn*

At Sephora, our guiding principle is “**Do the right thing.**”

Help! How do I know if I am doing the right thing?

### **Ask yourself:**

- Does what I am doing comply with Sephora’s guiding principals, policies, and values?
- Have I been asked to misrepresent information or deviate from normal procedures?
- Would I feel comfortable describing my decision at a team meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company, and myself?
- What would I tell my child to do?
- Is this the right thing to do?

Your answer to these questions will help guide your decision. Don’t forget: if you’re unsure if you are making the right decision, or are unsure of how to do the right thing, seek input from your manager, supervisor, or Human Resources Business Partner. We’re here to help.

## *Take Initiative*

### **How can I take initiative to help make a difference?**

- **Promote “We Belong”** and Sephora’s Diversity and Inclusion initiatives.
- **Become a champion** of “do the right thing” by promoting ethical behavior to your teams and colleagues.
- **Lead by example** – show others that you embody “do the right thing” by displaying it proudly!
- **Seek help** – if you don’t know the answer, discuss it with your manager, supervisor, or Human Resources Business Partner.
- **Speak up** – If you see something, say something. Sephora offers many different ways that you can speak out against behavior that doesn’t align with Sephora’s values.



# Individuals Care About Reporting Ethics

If you see someone at Sephora who is not doing the right thing – please speak up! We empower each of you to do your part to call out inappropriate behavior. It’s important that we hold each other accountable, and we ask for your help in doing so.

If you don’t feel comfortable bringing the issue to the attention of the person responsible for the behavior or conduct, you can also:

- 1. Speak to your people leader
- 2. Speak to your Human Resources Business Partner
- 3. Raise questions or concerns to Sephora’s Senior Director of Employee Relations & Global Compliance
- 4. Submit a complaint through iCare



**iCare** is a safe place where you can report unethical behavior. When you report a claim through iCare, you have the option to submit anonymously.

Any way you choose to report a complaint, it will be looked into discretely and as confidentially as possible by our Human Resources team.

**Retaliation is not tolerated at Sephora.** What does this mean? This means that you are safe in reporting complaints under any method you choose to report! If you believe someone has retaliated against you, or another Sephora employee, report it! Sephora will investigate this complaint and take corrective action against anyone who has engaged in retaliation, up to and including termination.



Accessing iCare is easy!  
Report an incident by scanning the QR code or visit [sephora.force.com/icare](https://sephora.force.com/icare)

# Conflicts of Interest

**What is a conflict of interest?** A conflict of interest can prevent an employee from doing the right thing. All employees are responsible for reporting any potential conflicts of interest. If you think that you may have a conflict of interest, please fill out our Conflict of Interest Disclosure Form and submit it to **HRCompliance@Sephora.com**. Our Human Resources team is happy to help.

## What are some examples of a Conflict of Interest?

- **Business Opportunities** – Taking advantage of a business opportunity which would not otherwise be made available through your position at Sephora.
- **A Second Job** – Working in a position that competes with Sephora can interfere with your time, energy, and commitment to your responsibilities at Sephora.
- **Personal Relationships** – Supervising or hiring a family member or someone you have a close relationship with.
- **Social Media Influencing** – Blogging or maintaining a social media account that posts information that is favorable or critical of Sephora, its brands, or its products.
- **Financial Interests** – Using your position at Sephora, our resources, or our information for your own or a family member’s financial gain.
- **Vendor Relationships, Gifts, and Entertainment** – Accepting large gifts of over \$150 within a calendar year or providing preferential treatment to a vendor.

What happens if Sephora finds that I have a conflict of interest? If a potential or actual conflict of interest exists, the disclosure will be referred to Sephora’s Compliance Committee for interpretation and resolution. Resolution may include Company waiver of the conflict of interest or request for removal of the conflict, as determined on a case-by-case basis.

## What if...

**Q: I’m interested in starting a second job to make some extra cash during my days off. I applied for a position with another retailer, but the job isn’t the same as what I do at Sephora. Would this still count as a conflict of interest?**

**A:** It depends. When in doubt, you should let us know by completing our Conflict of Interest form. Our experts are happy to help guide you towards doing the right thing! You also won’t face any serious consequences for disclosing a potential or actual conflict.

## What if...

**Q: I’m a new employee at Sephora and skincare is my passion! I have an Instagram account with a large following where I review all types of skincare products. Sometimes I receive free products to review. Do I have to let Sephora know?**

**A:** Yes, you should let Sephora know. Even if you have good intentions, accepting free products from other brands and posting reviews can create a conflict of interest.



# Teamwork & Respect for ALL

## Respect for Each Other

All employees are expected to treat each other with respect, courtesy and dignity.

This is the single most important guiding principle for all personal conduct at Sephora. Disparaging remarks, jokes or slurs about another person’s race, color, sex, sexual orientation, religion or other personal matters will not be tolerated. Such conduct is offensive to fellow employees and is inconsistent with the standard of respect due to each individual. Moreover, such misconduct may expose Sephora to claims of unlawful discrimination. Humor and joviality are welcome features of any workplace, but not at the expense of another employee’s feelings.

For more information on this subject, please refer to our **Anti-Harassment and Non-Discrimination Policies**.

## We ALL Belong: Freedom from Discrimination

Sephora is proud of the diversity of the people and cultures which make up its workforce. We believe that our diversity is an asset to our success, and by celebrating our differences, together we can cultivate a culture of innovation, creativity, and bold decisions. Sephora does not discriminate, nor does it tolerate discrimination by its employees, against individuals on the basis of race, color, hairstyle or hair texture, sex, national origin, religion, age, marital status, sexual orientation, or physical or mental disability.

Employment actions, including but not limited to hiring, evaluating or promoting, are based on an individual’s merit, qualifications, competence and level of contribution. This equal opportunity policy applies to all employees and applicants for employment, throughout all aspects of the employment relationship. It is the responsibility of all employees to contribute to an inclusive work environment and report any perceived violations of Sephora’s non-discrimination policy to Human Resources.

What if...

**Q: Whenever we receive new product, my manager always asks me to swatch samples on my skin to see how the product looks on “darker skin”. I want to be a team player, but it makes me feel uncomfortable being singled out and always being treated like the guinea pig just because of my skin tone. What should I do?**

**A:** Speak up. Tell your manager how this makes you feel. Even if they don’t have bad intentions, it’s important that we hold everyone accountable for their actions so that we can continue building an inclusive workplace together. If you don’t feel comfortable talking to your manager directly, report the incident in iCare or report it to your Human Resources Business Partner.

## Contributing to an Inclusive Environment

Sephora believes we ALL have a role to play in building a more connected and inclusive beauty community where everyone can belong. As a Sephora employee, we expect you to actively take steps to combat discrimination and contribute to an inclusive environment.

### This includes:

- **Understanding** the viewpoints of others who are “different” and advocating on their behalf
- **Recognizing your own** “implicit bias”, or stereotypes that impact our understanding, awareness, actions, and decisions in an unconscious manner.
- **Holding others accountable** for behavior that is biased, discriminatory, or unethical.

We all have implicit bias, but it’s important to be aware of these biases and be mindful that these biases can be hurtful, even if unintentional. At the client level, our implicit biases can damage Sephora’s reputation and, more importantly, lose the trust of our customers.

### Examples of ways our implicit biases can contribute to a negative client experiences include:

- Not greeting a man who walks into the store alone because you assume he was probably just searching the store for his wife or daughter.
- Prioritizing a client who is wearing a full face of makeup and/or nice clothes over a client with a bare face and sweatpants because they “look like they would be willing to make a bigger purchase”.
- Hovering over a group of teenagers because they look like they can’t afford to buy anything.
- Being overly attentive to someone based on an assumption that they might steal due to their race or ethnicity even though they told you they’re “just browsing” or don’t need assistance

## Racial Profiling

Racial Profiling occurs when someone suspects or targets a person based on assumptions made based on stereotypes of race or ethnicity. Racial profiling may occur because of someone’s implicit bias. We must all be mindful to never racially profile and should base any surveillance or increased client service (as a Loss Prevention technique) on objective, neutral criteria and verified observations. If the Company has a good faith reason to believe that an employee engaged in racial profiling, this will result in immediate termination.

Coexisting: Implicit Bias and Coworkers

We strongly believe diversity helps drive fearless innovation and is one of the most important elements that make Sephora so successful. As a result, implicit bias can be damaging to maintaining positive relations within our teams.

Examples of ways our implicit biases can be harmful to our teams include:

- **Intentionally or unintentionally** speaking over a coworker of a different gender, race, or ethnicity (or speaks with an accent), preventing them from contributing to team discussions.
- **Assuming someone** isn't a "culture fit" because they come from a different ethnic background, economic class, age, disability (real or perceived), gender, or gender identity.
- **Assuming a coworker** can't perform their job duties (lifting boxes, operating machinery, resolving complex issues) because of their appearance, disability, gender, or gender identity.
- **Commenting** on someone's hairstyle/hair texture, skin tone, or name as "exotic".

What if...

**Q: My coworker is transgender and uses the pronouns "she/her/hers". Our manager constantly calls her by the incorrect pronouns, using "he/him/his" even though she has corrected him several times on this. He appears to be using the incorrect pronouns on purpose. My coworker doesn't want me to report it because "she's used to it". What should I do?**

A: You should report it. It's important that ALL employees (regardless of position) are respectful to one another. Even if she asked you not to report it, speaking up for a coworker who may not have the courage to is the right thing to do. This type of behavior can become emotionally taxing on the employee and goes against Sephora's inclusive team environment.

Harassment & Sexual Harassment

Sephora policy strictly prohibits harassment of any sort, including sexual harassment. Harassment based on pregnancy, race, religious creed, color, national origin or ancestry, physical or mental disability, medical condition, marital status, age, gender or gender identity, sexual orientation, genetic makeup, veteran status, or any other characteristics protected by law is strictly prohibited. Sexual harassment is generally defined as any unwelcome conduct of a sexual nature which has the purpose or effect of creating an intimidating, hostile or offensive work environment. Examples of prohibited conduct include seeking sexual favors from subordinates in exchange for employment opportunities and benefits, unwelcome sexual advances, inappropriate touching, leering, sexually explicit joking or references, or the display of offensive pictures or photographs. All harassment claims will be swiftly investigated and, if necessary, remedial action, including termination of the harasser, will be taken to end the harassment. All employees must promptly report complaints and observations of harassment to Human Resources. Retaliation against employees for reporting complaints of harassment is also prohibited.

What if...

**Q: One of my coworkers keeps calling me a derogatory name behind my back. When I confronted her about it, she said it's just a joke, but it still made me feel uncomfortable. What should I do?**

A: You should report it. Even if someone says they are joking, it's not okay to call someone derogatory names. Sephora does not tolerate inappropriate remarks, gestures, or conduct of any sort.

Americans with Disabilities Act

Sephora is fully committed to complying with the Americans with Disabilities Act so that we can provide the greatest level of accessibility to our merchandise and services for clients with disabilities. We are also committed to complying with the employment provisions of the Act to ensure fair and equal employment opportunities for qualified individuals with a disability. Quality service must be provided to all clients, and we must be especially sensitive both to our clients and to fellow employees with disabilities.

Commitment to Safety

Sephora operates the business in accordance with all applicable occupational health and safety regulations and monitors their workplaces to prevent accidents and to eliminate potentially hazardous conditions. All employees have the opportunity and responsibility to contribute to a safe work environment by following safe practices and by notifying management or Human Resources when any health or safety issues are present. All workplace accidents, injuries and illnesses involving employees, even those that are not serious, must be immediately reported to your direct supervisor. Similarly, any accidents and injuries involving the company’s customers, vendors, contractors or any other person who is on company premises, even those that are not serious, must be immediately reported to your supervisor.

Sephora prohibits the possession, use, distribution or sale of illegal drugs or alcohol on Sephora premises or at Sephora-sponsored events other than events at which Sephora may provide alcoholic beverages. Misuse of such off-the-job drug or alcohol use that may adversely affect work performance, safety, or Sephora’s reputation in the community is also prohibited. Employees are expected to use legally obtained substances, including consumer products, over-the-counter medicines, or prescribed medications, according to recommended/prescribed use and dosage. Misuse of such substances that may adversely affect work performance is prohibited. Employees also must not report to work or be at work under the influence of drugs or alcohol.

Violence Prevention

Threats of violent behavior in the work environment, whether on or off Sephora premises, will not be tolerated and will result in severe disciplinary action, up to and including termination. If you are experiencing interpersonal problems with a fellow employee, a client, or a manager or supervisor, you should not hesitate to seek the assistance of your supervisor, the Human Resources Department or any available Employee Assistance Program resources.

Firearms, knives, or other weapons (with the exception of legally obtained pepper spray used for self-defense) are not allowed on Company premises or in any of its vehicles. Sephora reserves the right to inspect all belongings of employees on its premises, including packages, briefcases, purses and handbags, gym bags, and personal vehicles on company property.



Protecting Innovation  
Confidential Information

With so much innovation and exciting new brands coming to Sephora, we understand it can be difficult not sharing the excitement with others. However, confidential information is valuable to Sephora only as long as it is kept secret. Once information becomes generally known, it loses its economic value and no longer provides a competitive advantage to Sephora. Sephora’s confidential information is a collection of information that has been developed over time through the efforts of our employees and through our investment in business development, marketing, and merchandising. It is your responsibility to help protect this information and ensure it is not shared outside of the Company.

What is considered confidential information?

- **Our Company** – information about our products, financial information, marketing tactics, or innovations.
- **Our Employees** – employee ID numbers, dates of birth, contact information, employment status, attendance records, performance records, etc.
- **Our Customers** – emails, phone numbers, address, payment information, or purchase details.
- **Our Vendors & Suppliers** – information about our brands and business partners.

What if...

**Q: I received a phone call from someone who said their client is seeking the expertise of someone who is familiar with the beauty/retail industry. They offered to pay me \$500 for a consultation and I really need the money. Can I accept this opportunity?**

A: No, even if it’s a simple phone call, you should avoid situations that could potentially be targetting non-public Sephora information. This not only could lead to a conflict of interest, but could have serious legal consequences as well. If you’re not sure, always talk to a manager or Human Resources Business Partner for help.

What if...

**Q: What should I do if I notice that a fellow coworker or client is starting to get violent or aggressive?**

A: Try your best not to engage or provoke the individual and let your manager or supervisor know so they can help deescalate the situation or contact help in a safe manner.



Media Relations

Let our in-house experts speak on behalf of the Company. What we say can have a major impact on our reputation, which is why Sephora has a dedicated Public Relations team to help share all our exciting news with the world. Our PR gurus know just the right thing to say at the right times. If you are approached by the media, please refer it to **pr@sephora.com** and let your manager know as well.

Social Media

Sephora loves social media! Social Media is a great way to connect with others, keep up with the latest trends, and showcase your creativity. While we respect your right to use social media, we also expect you to use it responsibly, in accordance with Sephora’s policies.

Remember: When using social media:

- Never post anything that could be considered discriminatory or constitute threatening or unlawful behavior such as bullying or harassment
- Never disclose any information that is confidential and proprietary to Sephora including information about internal processes, profits, sales, or customers
- Ensure that others know that the opinions you share are your own, and not representative of Sephora
- Don’t use Sephora’s images or logos without permission
- Remember that you are not anonymous when you post information on social media. The information you share on social media platforms is published in a very public space and can be accessed by a significant amount of people. Consider how your social media posts may be tied to or reflective of Sephora - Are you wearing a Sephora branded uniform? Are you posting from inside the store?

What if...

**Q: I'm friends with one of my coworkers on social media. Recently she has been sharing a lot of political content and some of her posts have become very offensive and threatening. When I tried to explain why her posts were offensive, she became very hostile and aggressive. Is this something I should disclose to Sephora?**

A: Yes, you should report it. Sephora respects that each employee has a right to voice their own opinions and viewpoints on social media platforms, but we do not tolerate threatening behavior and discrimination. Employee social media posts should be respectful and in-line with Sephora's values, especially if you choose to publicly disclose that you are an employee of Sephora.



Acceptable Use of Technology

As one of the most innovative beauty retailers, Sephora’s technology resources are integral to our business and key to our success. Whether it be iPads, Price Guns, Color IQ Devices, Point of Sale (POS) systems, Email, laptops, etc., it’s important that you use Sephora’s technology resources for their intended business purpose and in accordance with the highest legal and ethical standards.

When using Sephora devices, networks, and technologies, you should NEVER:

- Conduct illegal, unethical, or disruptive activities;
- Access or browse any websites that may pose a threat to Sephora’s security or may be considered offensive to another individual;
- Alter any electronic information, communications, devices, or data in any way;
- Access Sephora’s network through unauthorized applications or devices;
- Download anything that is not directly related to, or required for business purposes;
- Introduce malicious programs (ex. Viruses, worms, e-mail bombs, etc.) or interfere with Sephora’s network security in any way;
- Upload any sensitive or confidential information to unauthorized websites;
- Send broadcast emails or voicemails, unless already approved by Sephora.

The activities described above are strictly prohibited. Keep in mind that Sephora actively monitors and reviews activities and content on all Sephora Technology. Ask yourself – how would this look if Sephora’s Information & Security team found this?

Our technology also plays a critical role in safeguarding confidential and sensitive information about our customers, business partners, and employees, such as credit card details, personal employee information, internal news and announcements, financial data, marketing strategies, brand launches, source code, etc. It’s your responsibility to ensure that this information is stored, accessed, and sent securely. Access to Sephora systems, devices, and networks are provisioned as determined appropriate for each individual. For this reason, you should never share login details or confidential data/information with someone who isn’t already provided access by Sephora.

**Remember:** Email is not a secure method to send information! Using standard e-mail to send confidential or sensitive information is strictly prohibited. Always use secure email, password protection, or document encryption to send information securely.

For detailed information on acceptable technology usage, please refer to Sephora’s **Acceptable Use Policy**.



Recording and Reporting Information

All documents, records, reports and other writings prepared on behalf of Sephora must be accurate and truthful. This includes accurately recording and reporting your time spent at work. You should never falsify, inflate or fail to make entries on company records or books of account; nor should any Sephora employee become involved in any scheme or arrangement to do so.

This applies to all records and reports, whether such materials are internal or external, for review by a government agency, vendor, financial institution or any outside third party with whom we do business. It also covers all types of documents used in the course of our business, including time cards, expense reports and accounting records. In particular, accounting records must comply with generally accepted accounting principles and established internal controls and procedures.

What if...

**Q: I found out that my manager has been altering our sales reports to make our store numbers look better. Should I say something?**

**A:** Absolutely. You should report the information to iCare as soon as possible. Even if you don't feel comfortable providing your name, you can leave information about the incident anonymously so our Employee Relations and Compliance Teams can investigate.

Record Retention

Sephora collects, maintains, and uses various types of personal information in the context of your employment relationship with Sephora. Sephora is committed to protecting the privacy and security of your personal information. For more information on how your personal information may be collected, used, and/or stored, please refer to Sephora's **Employee Privacy Notice**.



Using Expertise with Integrity

Sephora has an insatiable appetite for exploring our domains of expertise. We're hungry for knowledge, insights, and information to enhance our work and our ability to **always do the right thing**. This includes following local, state and federal law and conducting ourselves as professionals in all areas of our business. All employees are expected to abide by these laws.

Protecting Intellectual Property

As experts in our field, not only do Sephora employees need to protect our own intellectual property, but we also need to respect the intellectual property of others.

What is intellectual property?

- **Trademarks & Logos** - Sephora uses trademarks on merchandise, store signage, and advertisements, many of which belong to vendors who have authorized Sephora to use their marks for a particular purpose. Sephora employees must exercise care to ensure that trademark usage is consistent with the standards established by the trademark owner. Failure to satisfy our obligations to the trademark owner can not only have serious legal consequences, but can also cause serious harm to important business relationships and to Sephora's reputation.
  - **Branding & Trade dress**—the design, shape, attributes and overall “look” of a product—is also protected by law. Sephora designers and merchants should be careful not to copy (or “knock-off”) distinctive, non-functional features of another party's product, when creating new merchandise for Sephora.
  - **Software & Technology** - Much of the software and technology we use in our daily work is licensed to Sephora pursuant to agreements with suppliers. As a part of these agreements, Sephora employees are strictly prohibited from copying any software or corresponding manuals and documentation.
  - **Written Materials** – Written materials may also be protected under the copyright laws. Generally, it is unlawful to copy writings, photographs, drawings and other materials from magazines, books or trade publications without the express permission of the author. Copyrighted material may be shared with others by either purchasing duplicate copies of the publication or circulating it.
  - **Inventions, Trade Secrets & Patents** – Intellectual property doesn't have to be physical or tangible to be protected by law. Ideas and other information that is generally not known by the public is also protected and should not be openly shared without written approval.
- For more information on the proper use and protection of intellectual property, please refer to Sephora's Intellectual Property Policy.

Disparagement

It’s great to be proud of Sephora’s expertise, but employees of Sephora should avoid making any disparaging or negative remarks about others, including our competitors. While Sephora endorses enthusiastic and vigorous competition, negative remarks about our competitors or parties with whom we do business cast a poor light on us. Employees may discuss the merits of Sephora and why we do a good job, but should avoid disparaging others at all times.

Competition Law, Anti-Trust Violations

Here at Sephora, we believe that our competitors are what help fuel our creativity and spark innovation. We appreciate fair competition, which is why all Sephora employees must comply completely and in good faith with the antitrust and trade regulation laws where Sephora does business. Federal law prohibits retailers from using their purchasing power knowingly to obtain lower prices or other benefits which are not offered to competitors. These laws are designed to prevent interference with the competitive market system.

**You can help abide by these laws by doing the following:**

- Never discuss or establish agreements with a competitor that fixes prices, divides market share, or limits suppliers.
- Don’t seek out trade secrets or confidential information about our competitors.
- Gather information fairly. Only use information that is from a trusted source and is publicly available.

What happens if Sephora violates this? This is considered a serious crime, which includes hefty fines and imprisonment. For additional information, please reference our **Antitrust Policy** or contact Human Resources.

Gathering Information/Corporate Espionage

Remaining competitive is built into our DNA. Researching our competitors, keeping up with the latest trends, and studying information within our industry is essential to building our expertise, but it’s important that we be ethical and law abiding in how such information is obtained. You should never seek or accept any information from any client, competitor or other source to which Sephora is not

What if...

**Q: We just hired someone who used to work at one of our competitors. Can I ask them about their practices and procedures?**

**A:** No, you may not. It’s never appropriate to ask someone to disclose confidential or proprietary business information, even if it was with a previous employer.

legitimately entitled. Information that is received from another company and is marked proprietary or confidential may not be used for any purpose other than that which the owner intended. It is your responsibility as an employee to ensure that all information is sourced ethically. If you receive information that may have been received from an untrustworthy source, you must report it immediately to your manager, Human Resources Business Partner, or in iCare.

Insider Trading

The stock of LVMH, Sephora’s parent company, is publicly traded in France and the United States. For this reason, laws require prompt public disclosure of material information about LVMH. As an employee of Sephora, you may be provided with exclusive insider information about our company, our brands, our business partners, or other LVMH maisons before it is released to the public. In those cases, that information must be held in strict confidence, and those who have such information may not buy or sell or advise others to buy or sell LVMH stock until the information has been released to the public and enough time has passed to allow investor reaction. This applies to any other publicly traded company, including clients, suppliers, or competitors.

Buying or selling securities before information is publicly disclosed could be considered “insider trading.” Disclosing the information to anyone could be “tipping.” Either action could result in both civil and criminal liability both to employees personally and to LVMH. Questions about this sensitive and complicated area should be discussed with Sephora’s Legal Department.

Gifts, Entertainment & Hospitality

We understand that gifts can be a nice gesture to show appreciation for hard work and partnership, but accepting or giving gifts and other items of value can result in a conflict of interest and other unethical behavior. Know when it’s okay and not okay to accept a gift.

**It’s okay to accept a gift if:**

- The item is nominal in value (less than \$150)
- The gift is to be shared with an entire team
- The gift is for a legitimate business purpose

**It’s not okay to accept a gift if:**

- The item is of significant value (\$150 or more)
- The gift may be intentionally or unintentionally used to influence the decisions you make on behalf of Sephora
- The gift would be perceived as inappropriate or reflect poorly upon Sephora

If a coworker, business partner, vendor, or client offers you a gift you cannot accept: Politely tell them you can’t accept the gift. If you are unable to return the gift, you should consult with your Human Resource Business Partner or report the incident in iCare.

**Avoiding Bribery & Corruption**

When gifts, rewards, and other items of value are given or received with the intention of influencing behavior, it can be considered bribery. Bribes don’t have to be in the form of cash. They can also be in the form of gifts, meals, donations, job offers, or favors. You should never accept goods or gifts with the intention or expectation of receiving something in return. This is especially true when interacting with government officials. There are very strict rules governing what types of items can and cannot be given to government officials, which is why you should always consult with Sephora's legal department before giving any items of value to elected officials or employees of government agencies. When someone abuses their position or authority for their own personal gain, it’s considered corruption. Both bribery and corruption are not tolerated at Sephora, as it can tarnish Sephora’s reputation and can jeopardize the trust we’ve built with our customers.

**Political Contributions**

Sephora encourages the participation of all employees as private citizens in the electoral process. However, U.S. Federal Law and many state statutes prohibit a corporation from making direct or indirect political contributions of any kind. Included in this prohibition would be transportation or other services provided at Sephora’s expense. An example of a prohibited indirect political contribution would be the reimbursement by Sephora of a political contribution made by one of its employees. Nothing should be said that could create the impression that Sephora supports any particular political party or candidate.

Any questions regarding political questions should be discussed with Sephora's Legal Department.

**Legal Compliance & Legal Advice**

Sephora is committed to conducting its businesses in compliance with all applicable laws and regulations of the countries where we operate. To promote legal compliance and assist employees with legal matters, Sephora maintains an internal legal department whose responsibility is to advise upon, manage and supervise the legal affairs of Sephora. Employees should promptly notify the Legal Department of any significant legal matters which arise, such as, for example, any threatened or pending litigation, investigations, major labor disputes, trademark infringement claims, or claims relating to any major agreement with vendors or financial institutions. You should feel free to consult with a member of Sephora's Legal Department as appropriate.

**Contracts with Others**

Obligations under agreements, whether formal or informal, written or oral, are as serious as those imposed by laws and regulations. To protect Sephora against entering into contracts or agreements inadvertently or without adequate deliberation, let our Strategic Sourcing partners do the work.



SEPHORA STANDS

*Passion & Balance*

At Sephora, we are passionate about standing with our people, our planet, and our communities. We are fearless in demonstrating the proper balance of care for ourselves and each other with positive thoughts, actions, and deeds.

**Our People**

Sephora respects individual human rights and is committed to creating a culture of belonging as we celebrate the beautiful diversity of our people and our clients. From internal employee networks, to our community events and classes, we are constantly seeking new ways to create a secure space where all are valued and treated equally. As a part of this commitment, Sephora only engages with suppliers, brands, and business partners who share in our commitment to human rights and ethical labor practices.

**This includes:**

- Safe working conditions and fair wages for all
- Freedom from discrimination
- Zero tolerance of forced labor, compulsory labor, or child labor

**Our Planet**

Sephora is passionate about protecting the world around us and expects all employees to act in a way that is environmentally responsible. Our sustainability journey is guided by the belief that together we can protect and preserve the health and beauty of our planet. Not only does Sephora abide by environmental laws that apply to our business, but we take it a step further.

We take action to cultivate sustainable practices in our retail spaces, at our headquarters, and throughout our supply chain. From environmentally responsible packaging to conscientious energy consumption, we see every challenge as an opportunity to innovate. We expect all employees to act in an environmentally conscientious manner and challenge you to think about how you can help safeguard our planet.



Our Communities

We’re passionate about giving back to the communities where we do business. From our generous donation and volunteer matching programs, to product donations, our Gift of Time and Together Fund, there are plenty of ways to get involved. Sephora offers several options to contribute time, money, and support to the causes we believe in. We encourage you to reach out to our Sephora Stands partners who share a passion for giving back and can help you find options to donate, request a match, or find other charitable options.

We encourage employees at all levels to get involved in their community, however, you shouldn’t make donations on behalf of Sephora unless you have been approved to do so. All charitable donations must be pre-approved by Sephora Stands. If you do decide to participate in charitable activities on your own time, make sure what you do is lawful and doesn’t interfere with your work at Sephora. Employees are also prohibited from soliciting materials where work is performed, including information on charitable donations.

Want to get involved or have an idea on how we can help out our communities?  
We’d love to hear from you! Please contact Sephora Stands at **SephoraStands@Sephora.com**.

Resources

Have a question about the content in this document? We’re here to help. Don’t be afraid to speak up and ask for help. Remember: It’s important to ensure that all employees are doing their part.

Policies Referenced in this Document:

All documents can be found in Sephora Mix (Stores) or Sephora Connect (DC & FSC) under Policies and Procedures:

- Acceptable Use Policy
- Anti-Harassment & Non-Discrimination Policy
- Antitrust Policy (Within Business Conduct Policy & Procedure)
- Employee Handbook
- Confidentiality Policy (Within Business Conduct Policy & Procedure)
- Conflict of Interest Policy
- Intellectual Property Policy (Within Business Conduct Policy & Procedure)
- Employee Privacy Notice
- Social Media Policy

Helpful Contacts:

**Employee Relations:** EmployeeRelations@Sephora.com

**HR Compliance:** HRCompliance@Sephora.com

**Information Security:** Information.Security@Sephora.com

**IT Help Desk:** ITHelpDesk@Sephora.com

**Loss Prevention:** Investigations@Sephora.com

**Public Relations:** PR@Sephora.com

**Legal:** Legal@Sephora.com

**Sephora Stands:** SephoraStands@Sephora.com

