

# Global human rights and modern slavery statement 2025

This statement is being published pursuant to the California Transparency in Supply Chains Act (2010), the UK Modern Slavery Act (2015), the Australia Modern Slavery Act 2018 (Cth), the Norwegian Transparency Act (2022), and the Canadian Fighting Against Forced and Child Labor in Supply Chains Act (2024), and sets out the steps Kenvue Inc., including its subsidiaries (“Kenvue” or “the Company”), has taken to strengthen its due diligence processes to identify and address fundamental human rights, including modern slavery and decent working conditions, in its business operations and supply chain. We prepared a single statement because we manage our efforts to respect fundamental human rights in a consistent, integrated manner across our global operations. This statement constitutes the disclosure for Kenvue’s 2025 fiscal year ended December 28, 2025.

Not all of our group companies are subject to the Acts referred to above. To the extent applicable, the signature pages to this statement include additional disclosures specific to the entities required to prepare a statement under one or more of the Acts referred to above.

This Statement has been developed through a consultation process with key internal stakeholders and an external consultancy gap assessment.

## **1. Organization and Supply Chain Structure**

### **Kenvue’s Business, Operations and Supply Chain**

At Kenvue, our purpose is to realize the extraordinary power of everyday care. With \$15.1 billion in net sales in 2025, we are the world’s largest pure-play

consumer health company by revenue. By combining the power of science with meaningful consumer insights and our digital strategy, we empower consumers to live healthier lives every day. With a presence in more than 165 countries worldwide and an over 135-year legacy, we are a global leader at the intersection of healthcare and consumer goods. We operate our business through three reportable business segments: 1) Self Care, 2) Skin Health and Beauty, and 3) Essential Health. Headquartered in New Jersey, U.S., Kenvue's operations include the research and development, manufacturing, and sale of a broad range of consumer health products.

As of December 28, 2025, Kenvue had approximately 22,000 employees, with approximately 23% located in North America, 28% in EMEA, 30% in APAC, and 19% in Latin America. Our in-house manufacturing footprint delivered over 60% of our sales volume in 2025, with the remaining sales volume being supplied by an extensive global network of external manufacturing facilities operated by third-party suppliers.

Our supply chain consists of approximately 12,000 suppliers in more than 100 countries providing goods and services. The principal raw materials used in our products include resins, silicon, pulp and corn derivatives, paper, agrochemicals, vegetable oils, and oleochemicals.

## **Governance**

Our Board of Directors is ultimately responsible for oversight of our sustainability impacts, risks and opportunities and ensuring our sustainability priorities and commitments are integrated into the Company's long-term strategy. This includes oversight of human rights-related strategies and risks. On an annual basis, the full Board receives an in-depth update on the Company's sustainability strategy, which we call our "Healthy Lives Mission". After each regularly scheduled committee meeting, the committees report to the full Board with updates on their areas of designated sustainability oversight responsibilities. For example, the Nominating, Governance and Sustainability Committee (NGSC) oversees and provides updates to the Board on governance, climate, nature and human rights-related strategies and risks, and the Compensation & Human Capital Committee oversees and provides updates to the Board on human capital management strategies and risks.

Kenvue also maintains a cross-functional Human Rights Steering Committee composed of representatives from various functions, including legal and compliance, procurement, human resources, sustainability, integrated risk management, and global corporate affairs. The Committee meets at least twice a year, and as needed, and is responsible for overseeing action plans for the Company's salient human rights topics, which support regulatory compliance, due diligence, ongoing monitoring, external human rights and modern slavery reporting rights, and related policies and risk management programs. Updates are provided to Kenvue leadership and the Board of Directors as part of the Board's sustainability oversight responsibilities.

## 2. Policies and Processes

### Our Policies and Positions

Kenvue's commitment to respecting human rights is reflected throughout our organization in our values and the way we conduct business. We have several policies and positions relevant to this topic:

- **Code of Conduct** – The Kenvue Code of Conduct is the foundation that guides our people in their daily decision-making while at work. It sets forth the principles and policies to which we commit ourselves every day, including the commitment to protecting human rights. The Code of Conduct applies to all Kenvuers, as well as consultants and third-party contractors engaged by Kenvue to act on our behalf, regardless of where we work or the type of work we do. It is communicated through a mandatory online training.
- **Position on Human Rights** – Our position on human rights outlines Kenvue's commitment to respecting and promoting human rights across our business operations and value chain worldwide. All suppliers are expected to comply with the Human Rights principles outlined in the position. Amongst other prohibitions aimed at promoting fundamental human rights and decent working conditions, our Position on Human Rights states that we do not accept or condone any aspect of forced, compulsory or child labor and comply with forced labor and child labor laws across our operations.
- **Supplier Code of Conduct** – Our Kenvue Supplier Code of Conduct (SCOC)—available in nine languages, including English—sets forth the

values, principles, and expectations regarding the ethical, social, and environmental conduct we expect from our suppliers. Amongst other expectations and prohibitions, the SCOC also prohibits our employees, suppliers, and other business partners from engaging in forced labor, child labor and human trafficking related activities. In addition to adhering to the expectations outlined in the SCOC, we expect our suppliers to uphold similar requirements in their own business partnerships, encouraging our partners to cascade expectations to their suppliers, and to make reasonable efforts to disclose information to Kenvue, where relevant.

- **Position on Responsible Palm Oil Sourcing** – Our position on responsible palm oil sourcing outlines the approach we are taking to support the supply chain transformations that are necessary to protect the environment and the people who work in the palm oil supply chain.
- **Position on Responsible Wood Fiber Sourcing** – Our position on responsible wood-fiber sourcing outlines our approach to support the transformations necessary to protect the environment and the people in the paper and wood-fiber supply chains.
- **Position on Sustainable Sourcing** – Our position on sustainable sourcing explains that Kenvue expects suppliers to meet high levels of integrity and specified ESG requirements. The position summarizes Kenvue’s efforts and processes to ensure compliance, including its SCOC, supplier selection/engagement processes, and assessment and auditing procedures (including use of third-party ratings and, where needed, pre-award audits).

Our policy approach—as woven throughout the aforementioned policies and positions—is designed to be consistent with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct, the United Nations Guiding Principles on Business and Human Rights (UNGP), the International Labor Organization (ILO) labor standards outlined in ILO Conventions No. 138 and 182 related to child labor and young workers, and all applicable laws and regulations concerning age, hours, compensation, health and safety. We review and develop our policies and positions as we gather more insight into our impacts, risks and opportunities, as well as input from in-house experts, suppliers, and external stakeholders.

### **3. Risk Management Processes**

#### **Human Rights Due Diligence Framework**

We have established a human rights due diligence (HRDD) framework aligned with the UNGP and OECD Guidelines for Multinational Enterprises (the “OECD Guidelines”). These international principles and guidelines recognize that HRDD is an ongoing, iterative, and collaborative process that requires collaboration with rightsholders and third parties.

We work with a complex global network of suppliers that are critical to business success. As discussed below, we manage a system for supplier selection, engagement, education, assessment, and auditing to maintain our safety, quality and ethical sourcing standards. All Kenvue suppliers are expected to comply with the standards outlined in our SCOC, which are also incorporated into our standard supplier agreement’s terms & conditions. As appropriate, we work with suppliers to identify actions and timelines to achieve improvement and mitigate risk as a condition of initial or ongoing engagement. We consider progress in meeting agreed upon standards, and ongoing performance, in our sourcing decisions.

#### **Human Rights Impact Assessment and Salient Topics**

Our recent Human Rights Impact Assessment (HRIA) identified potential human rights risks and impacts across our value chain including upstream, owned operations and downstream impacts. The HRIA’s findings have been used to enhance our processes to prevent, mitigate, and remediate (as needed) any negative effects on individuals and communities. The HRIA was led by the Global Sustainability team and engaged more than 30 internal stakeholders across functions, including human resources/ employee relations, facilities/ EHS, enterprise risk management, brand and marketing, community impact, and medical safety. Select external stakeholders from NGOs with subject matter expertise were also engaged.

Based on the HRIA, we have identified seven salient human rights topics:

- Safe and healthy workplace
- Product quality and safety
- Responsible recruitment and freedom from forced and child labor

- Fair wages
- Working hours
- Freedom of association and collective bargaining
- Nondiscrimination and anti-harassment

These human rights topics are a point of focus for the company. Each topic is addressed in our Code of Conduct and SCOC and managed by appropriate teams within Kenvue through the systems discussed throughout this statement.

As part of our HRIA, we also conducted a high-level hotspot assessment to identify and prioritize geographies and materials within Kenvue's value chain that may have heightened risk of adverse human rights impacts and that may require additional due diligence. Sources used as part of this assessment included the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor, Verite High Risk Commodity Reports, the Global Rights Index, and the Sybilline ASTRA Human Trafficking and Forced Labor scores. We identified key raw materials with potential for heightened human rights risk.

We recognize that risks exist in relation to certain raw materials used in our products and geographies in which we and our suppliers operate. As it relates to the risk of modern slavery in our supply chain, we believe that the principal risk is that modern slavery could occur without our knowledge, in violation of our policies, in the upper tiers of our supply chain. The rightsholders most vulnerable to these potential impacts include women, migrant workers, and workers in high-risk geographies or supply chains. Through the policies, procedures and other initiatives discussed in this statement, we seek to mitigate this risk. We believe that the risk of modern slavery in our own workforce is minimal due to the strength of our internal policies and procedures.

### **Supplier Assessments and Audits**

We have established controls that work to uphold human rights and minimize our environmental impacts throughout our supply chain. We verify supplier performance through an approach that leverages both internal subject matter experts as well as external organizations such as EcoVadis, a sustainability ratings firm that evaluates companies' environmental, social and governance performance, and other tools to monitor a range of risks beyond Tier 1 suppliers.

We conduct two types of supplier audits: environmental, health, and safety (“EHS”) audits and responsible sourcing audits. Suppliers are identified for audits based on an overall risk assessment that incorporates, among other factors: EcoVadis findings; the types of goods and services the supplier provides (industry risk); and where the supplier is located (geographic risk).

- **EHS audits:** The EHS team at Kenvue conducts most of our supplier EHS audits using a protocol based on our Responsible External Supply Chain EHS Standard, which defines the EHS requirements for external suppliers, including risk reduction and the prevention of supply chain interruption. For applicable high-risk suppliers, we conduct audits using the Pharmaceutical Supply Chain Initiative (“PSCI”) Audit Report Template. In 2025, we conducted 62 EHS audits, including audits conducted for new suppliers. In some cases, third-party firms conduct EHS audits on behalf of Kenvue, or we accept PSCI audit reports provided by suppliers.
- **Responsible sourcing audits:** The Company engages an accredited external firm to conduct audits according to the SEDEX Members Ethical Trade Audit (SMETA) 4-pillar Guidelines, or equivalent standards. A SMETA 4-pillar audit includes an assessment of: labor standards; health and safety; management systems; human rights; recruitment; entitlement to work; subcontracting and homeworking; environmental performance; and business ethics.

In 2025, we initiated a refresh of our supplier responsible sourcing audit program, with the objective of strengthening our approach to identifying and managing sustainability risks—particularly labor standards, working conditions, and human rights—within our global supplier base. This work included:

1. Supplier segmentation and selection based on risk
2. Evaluating existing audit reports (mutual recognition)
3. Coordinating audit requests
4. Enhancing corrective action protocols
5. Providing analytics, recommendations and training based on findings

The refreshed program is planned for rollout in 2026 and will introduce an enhanced process for escalating human rights impacts within our supply chain. An accredited third party was engaged to support this work.

## **Additional Initiatives to Prevent and Mitigate Risk**

In addition to the policies and practices discussed above, we also engage in certain actions focused on preventing and mitigating human rights risks in identified high-risk areas.

- **Targeted assessments in high-risk supply chains:** We monitor supplier and producer conformance with our responsible palm oil sourcing expectations via Chain of Custody audits of our facilities. These audits are conducted by a third-party auditor approved by the Roundtable on Sustainable Palm Oil (“RSPO”) and assess whether the facility meets the requirements for source material management and documentation. We also conduct supplier assessments using the Sustainable Palm Index, an industry tool that rates the commitments, action plans, and achievements of our palm suppliers and identifies areas for improvement.
- **Supplier collaboration:** Supplier collaboration plays an important role in helping us meet our responsible sourcing objectives and determining our HRDD approach. We strive to work with suppliers that share our values, comply with applicable laws and regulations, and adhere to our expectations on respecting human rights, business conduct, transparency, and traceability.
- **Standardizing human rights criteria as part of procurement process:** As part of our supplier selection and engagement process, we provide procurement teams with guidance and tools to incorporate environmental and social considerations into supplier requests for proposals (RFPs), including through standardized, risk-based questionnaires and templates integrated into our e-sourcing system.

## **4. Remediation Process and Grievance Mechanisms**

### **Addressing Non-conformance**

We aim to maintain long-term, strategic relationships with suppliers and work with them to resolve audit findings and support continuous improvement. We provide post-audit supplier support, which may include technical visits or expert training and best practice sharing, as well as business reviews with direct

coaching and guidance. We also track and monitor corrective action plan progress, as needed.

Where necessary, and depending on the severity of the issue, we may escalate our response accordingly. If, during an audit, we identify non-conformances with our SCOC or other relevant Kenvue standards, we communicate those findings and share our expectations with the audited supplier. The supplier is required to document a plan for time-bound corrective actions and demonstrated resolution. If we identify a critical nonconformance, we expect suppliers to resolve the issue in a timely manner. If the supplier fails to rectify any nonconformances, we may withdraw business or, if it's a new supplier candidate, decline to work with them.

### **Grievance Mechanisms**

Any suspected violations of the Code of Conduct, SCOC, other Kenvue policies, or applicable laws and regulations may be reported—by employees, workers in our supply chain, or other relevant stakeholders—through the Kenvue Integrity Line, our global channel for reporting questions or concerns. The Kenvue Integrity Line is managed by a third party (NAVEX) and available 24 hours a day, 7 days a week, in 24 languages. The Integrity Line offers anonymous reporting (where permitted by local law) of concerns or potential violations of Kenvue policies or the law. We will not tolerate threats or acts of retaliation in any circumstance and expect suppliers to have similar grievance mechanisms and non-retaliation provisions.

In addition, for specific supply chains such as palm oil, we collaborate with industry peers in joint grievance monitoring using trusted third-party platforms. Through our membership and in collaboration with the Earthworm Foundation, we participate in a shared grievance dashboard to monitor, review, and investigate grievances in the palm oil supply chain.

In order to evaluate the effectiveness of Kenvue's grievance mechanism, in alignment with the OECD Guidelines and UNGP, we conducted a peer benchmarking exercise, engaged internal stakeholders to document the current state and process flow of our grievance processes, and identified areas for improvement and monitoring. This work informs our plans for continued improvement and accessibility of our grievance mechanisms.

In the 2025 fiscal year, there were no confirmed instances of forced labor or child labor identified via our Integrity Line or other grievance channels.

## 5. Training and Awareness

Ensuring our workforce's capacity to understand human rights and modern slavery challenges and the complexities to managing these topics is important to our human rights approach. All employees are provided with mandatory training on our Code of Conduct, which includes information on human rights and how to report concerns. In 2026, we aim to develop and launch more detailed human rights training and awareness programs for employees, with a priority focus on training for employees in procurement and other functions that may have more proximity to potential human rights impacts. This training will include information on identifying, mitigating, and remediating human rights risks across Kenvue's business.

### Partnerships and Collaborations

In addition to the sector initiatives previously described in this statement, Kenvue also participates in various external collaborations to share insights and best practices related to human rights. We are a member of the [Business for Social Responsibility \(BSR\) Human Rights Working Group](#), a collaboration that supports companies across industries in implementing the UNGP. This working group provides a forum for members to highlight emerging human rights topics and to share best practices for HRDD. The group also gives Kenvue access to tools, frameworks, and resources to help us advance our human rights practice.

We are also a member of [AIM-Progress](#), a global forum of leading fast-moving consumer goods companies and common suppliers sponsored by the Association des Industries de Marque (AIM), the European Brands Association. AIM-Progress aims to promote responsible supply chain and sourcing practices covering labor and human rights, capability-building, and mutual recognition of social compliance audits. In 2025, we participated in a benchmark exercise led by AIM-Progress. Through our responses to a member survey, we were able to assess the maturity of our responsible sourcing program compared to our peers. We are taking these insights into consideration as we continue to enhance our strategy.

## 6. Assessing the Effectiveness of Our Actions

We recognize that to create impact at scale we must continue to move beyond monitoring compliance to proactively engaging with our suppliers and supporting broader industry efforts to improve transparency and share best practices. We continue to enhance our Sustainable Sourcing Program, which helps us strategically engage with our suppliers to enhance the management of human rights-related risks, adverse impacts, and opportunities throughout our supply base. Kenvue currently tracks the following key performance indicators and metrics to measure our progress.

- Percentage of active employees who completed the online Code of Conduct training
- Percentage of Kenvue suppliers with EcoVadis assessments completed
- Percentage and volume of palm oil-based ingredients purchased through RSPO supply chains or covered by RSPO Book & Claim credits
- Percentage and volume of certified or verified recycled paper and wood fiber packaging, including paper/wood fiber certified by the Forest Stewardship Council (FSC®)

Kenvue aims to define and measure additional metrics to monitor our progress in the future.

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