

VICTORIA'S SECRET & CO.
PHOTO SHOOT COMPLIANCE PROCEDURES

At Victoria's Secret & Co., ("VS&Co" or the "Company") our values define who we are and what we stand for, including treating everyone with dignity and respect. These Photo Shoot Compliance Procedures ("Procedures") apply to all VS&Co associates and third parties participating in photo shoots. A "Shoot" is defined as any VS&Co photo shoot, video shoot, fashion show, commercial or other event in which models are present (as determined by the Company). Harassment of any kind during a Shoot is prohibited. Unacceptable conduct includes, but is not limited to, the conduct described in the VS&Co Civility and Anti-Harassment policy (see **Appendix A**) and Sexual Harassment policy (see **Appendix B**).

Every Shoot performed for VS&Co must adhere to the following guidelines:

- All work performed during a Shoot shall comply with applicable laws and regulations, including but not limited to labor, wage and hour, and immigration laws.
- All models must be at least 18 years old. Any exceptions must be approved in advance by the VS&Co Ethics & Compliance Department.
- Shoot participants, which may include, but are not limited to, models, photographers, designers, makeup artists, assistants, and any VS&Co associates, may not be under the influence of alcohol or illegal drugs (including unauthorized prescription drugs). The consumption or use of alcohol and illegal drugs (including the misuse of prescription drugs) during a Shoot is strictly prohibited.
- Shoot participants may not post to social media any lewd, offensive, or unprofessional images involving VS&Co products or sets.
- The Company will provide private dressing spaces for models appearing in Shoots.
- Models should not be left alone with any photographer, or any other participant during a Shoot.
- An authorized compliance representative will be present for the duration of all Shoots to provide oversight and ensure compliance with the Procedures.
- Any concerns a model has regarding a Shoot must be considered.
- Models will be given information about the Shoot including, but not limited to, a list of the people scheduled to provide services during the Shoot and the creative plan, or point of view to be photographed, for the Shoot.
- Models will not be pressured to expose their bodies more than they are comfortable doing.

Models or other Shoot participants should communicate any concerns about these guidelines or other special requests to the compliance monitor or VS&Co representative on site. Shoot participants who see something that may be inconsistent with the Company's Civility and Anti-Harassment Policy, Sexual Harassment Policy or these Procedures should contact the VS&Co Ethics Hotline at +1.844.575.1079 or www.vsc.ethicspoint.com.

The Ethics Hotline is operated and staffed by a third party, and callers can speak anonymously to report illegal or unethical activities, without fear of retaliation. All contacts to the Ethics Hotline are reviewed and addressed, and retaliation is strictly prohibited. See **Appendix C** for additional details regarding the Ethics Hotline and the VS&Co Speak Up & Anti-Retaliation Policy.

Contact the VS&Co Ethics & Compliance Department at ethicsandcomplianceVS@victoria.com with any questions or concerns about these Procedures.

APPENDIX A
VICTORIA'S SECRET & CO. CIVILITY AND ANTI-HARASSMENT POLICY

As stated in our Code of Conduct, we do not tolerate discrimination or harassment. Examples of harassment or discrimination include:

- giving unwanted sexual attention to others – colleagues, customers, vendors, and other business partners or third parties;
- offering a workplace benefit in exchange for sexual conduct or giving work-related rewards for sexual conduct;
- sexually explicit or suggestive comments or behavior;
- sexual joking, storytelling and the like;
- repeated requests for dates;
- comments, cartoons, jokes, emails, texts, social media posts, or other communications that include degrading, insulting or insensitive content or assumptions concerning any individual's race, color, religion, gender, gender identity, national origin, citizenship, age, disability, sexual orientation, marital status or any other protected status under applicable laws;
- verbal, non-verbal, visual or physical behavior that makes another person feel intimidated, offended or uncomfortable;
- slurs and other offensive remarks; and
- joining in when others are harassing or discriminating against another person.

In addition to discrimination or harassment, bullying is another form of incivility and disrespectful behavior that can range from minor incidents to serious ones and will not be tolerated. Bullying typically involves repeated actions intended to intimidate, harass, degrade or offend. Bullying can be verbal, nonverbal, psychological or physical. For the most part, we usually know a bully when we see one in action. For illustration purposes, here are some examples of bullying that undermine our commitment to treat everyone with dignity and respect:

- demeaning a colleague, particularly in front of others;
- personal attacks (angry outbursts, name-calling and the like);
- physical intimidation;
- encouraging others to turn against or "gang up on" a targeted co-worker or group of coworkers;
- pressuring someone to do or say something they don't want to;
- sabotaging another's work product or deliberately undermining someone's work performance; and
- behavior that is malicious, hostile or offensive.

Harassing, bullying, discriminating against, or otherwise disrespecting a colleague, customer, vendor, contractor or business partner electronically, off company property or off-the-clock is also prohibited. This policy also applies to all customers, vendors, contractors, business partners or potential business partners and other third parties when they are doing business with us or are on our premises, and we expect and require that they will be treated with respect and that they will behave in ways that align with our culture of respect.

APPENDIX B
VICTORIA'S SECRET & CO. SEXUAL HARASSMENT POLICY

Victoria's Secret & Co. ("VS&Co") is committed to ensuring a workplace in which all persons are treated with dignity and respect. We strive to provide a working environment that is professional, respectful, inclusive, and free of inappropriate or disruptive behavior. Most importantly, we will not tolerate, condone or allow any form of sexual harassment, whether engaged in by or directed at fellow associates, applicants, interns, independent contractors, temporary associates, consultants, customers, vendors, or third-party partners who conduct business with us, whether on or off company property. Our culture of dignity and respect guides all associate interactions with one another – regardless of whether the interactions occur in or outside of the workplace.

Sexual harassment is an unlawful form of workplace discrimination that may subject the Company and individual harassers to legal liability. More importantly, sexual harassment violates our culture and values. Sexual harassment can create lasting injury to the people who experience and witness it. It undermines morale and productivity and is damaging to our culture of equal respect, civility, and inclusiveness.

If you experience or witness any form of sexual harassment, you should report that conduct as soon as possible. We will investigate all such reports and take responsive action as is appropriate based on our investigation. You will not be subject to retaliation, disciplinary action, or any career disadvantage for making a good faith report of sexual harassment.

Individuals Covered Under this Policy

This policy applies to and covers all associates, applicants, interns, independent contractors, temporary associates, consultants, customers, vendors, and other third parties when they are conducting business with us or are on our premises.

Definition of Sexual Harassment

For purposes of this policy and the Code of Conduct, sexual harassment is defined as unwelcome conduct, whether verbal or physical, which is either of a sexual nature or which is directed at an individual because of that individual's sex, sexual orientation, self-identified or perceived sex, gender identity, gender expression, or transgender status. This can include, but is not limited to: (1) when submission to or rejection of the conduct is made either explicitly or implicitly a term or condition of employment; (2) when submission to or rejection of such conduct is used as the basis for employment decisions; or (3) when the conduct substantially interferes with an individual's employment or creates an intimidating, hostile or offensive work environment.

Reporting and Investigating Complaints of Sexual Harassment

We strongly encourage anyone who believes they have been subjected to, or have witnessed, behavior that violates this policy to report it. Models or other Shoot participants should communicate any concerns about these guidelines or other special requests to the compliance monitor or VS&Co representative on site. However, if you do not feel comfortable using these reporting channels or prefer to remain anonymous you have other options including our Ethics Hotline (1.844.575.1079 or available for online submissions at <https://vsco.ethicspoint.com>) or contacting VS&Co Ethics & Compliance department directly at EthicsVS@victoria.com.

APPENDIX C
VICTORIA'S SECRET & CO. SPEAK UP & ANTI-RETALIATION POLICY

VS&Co is committed to conducting business with fairness, integrity, and respect for the law. We are also committed to creating a safe environment and ethical culture, which includes living the VS&Co values everyday. If you observe or experience conduct that appears to violate the law, our Code of Conduct, or other VS&Co policies and procedures, you are encouraged to Speak Up. By doing so, you give us the opportunity to appropriately address the issue.

Speaking Up is always encouraged and individuals who Speak Up will always be protected from any kind of retaliation. This means that reporters will not suffer consequences for raising concerns in good faith about suspected misconduct. After all, Speaking Up is essential for us to sustain our reputation, success, and ability to operate in the global marketplace – both now and in the future.

This Speak Up policy is available to everyone working for or on behalf of VS&Co. It is also open to any party with whom VS&Co has or has had some type of business relationship (such as contractors, models, business partners, suppliers, agents, distributors, representatives and customers) who wish to raise a concern about possible misconduct involving VS&Co. There are several ways to Speak Up:

- The VS&Co ethics hotline is administered by an independent third party and is available 24 hours a day 7 days a week, and 365 days a year. You can call 1-844-575-1079 or go to <https://vsco.ethicspoint.com> and click on Raise a Concern.
- You may submit your report online by going to <https://vsco.ethicspoint.com>.
- You may send an email directly to the VS&Co Ethics & Compliance Department at ethicsVS@victoria.com.

When using the ethics hotline or submitting an online report, you always have the option to remain anonymous (where permitted by the laws of your country). We do however encourage individuals to reveal their identities as it is much more difficult, and in some circumstances even impossible, to properly investigate anonymous reports.

What kind of information do I need to provide?

A report can only be thoroughly investigated if it contains sufficient information and there is a reasonable possibility of obtaining more details and coming to a proper resolution. When you file a report (in person, by email, by online submission, or by phone), please provide as much information as you can to enable the Company to assess and investigate your concern, including details such as:

- The background, history, and reason for the concern
- Names, dates, places, times, and other relevant information
- Any documents that may support your report

Information reported to the Company, to the extent possible, will be kept confidential and only shared within the Company on a need-to-know basis.

What can I expect after I Speak Up?

VS&Co takes every report of possible misconduct seriously. Unless the circumstances of your report require an immediate intervention, your report will undergo an initial review, and if necessary, it will be appropriately investigated.