

Empowering the Frontline: Responsible Management of Brand Promoters

Expert Session #3 with

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Nisha Terumalai, Project Manager at the Fair Labor Association



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Speakers



Julie Vallat

Vice President of Human
Rights

L'ORÉAL
GROUPE



Nisha Terumalai

Project Manager

 **Fair
Labor**

Agenda



Introduction and scene setting



The Future of the Debate

Guidelines for
Responsible
Management of Brand
Promoters




Case Study with L'Oréal

An example of how the
company has successfully
implemented these guidelines
to enhance the management of
their Beauty Advisors



Q&A

Guidance Series for Own Operations



Building a Human Rights
Due Diligence Roadmap
for Own Operations

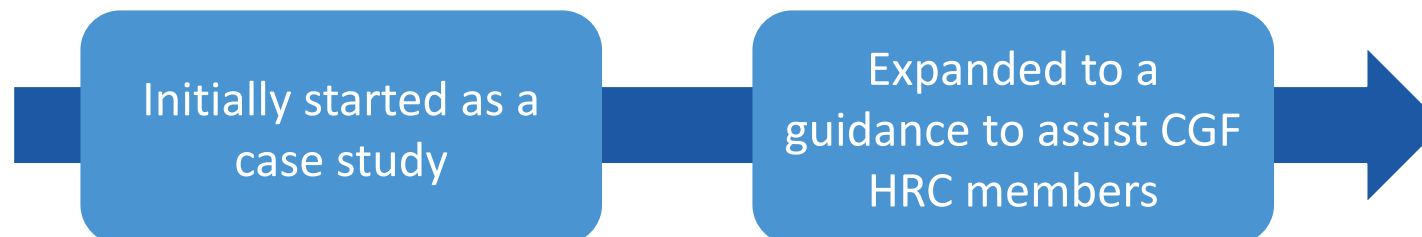
Responsible
Management of Brand
Promoters: Case study
with L'Oréal

Extending Grievance
Mechanisms to
Third-Party Workers in
Own Operations: A Case
Study

Responsible
Management of Third-
Party Workers: Engaging
with Third Party Agencies

Background and context

- Companies complete an SAQ (Self-Assessment Questionnaire)
- Common gaps identified in the SAQ
- Gaps identified with outsourced functions
- Capturing good practice case studies was part of the original plan for shared learning



Who are brand promoters?



Definition: Individuals hired to represent and promote a brand's products or services, often in retail settings or events.

Primary Role: Engage with customers to create a positive brand experience and drive sales through direct interaction and product demonstrations.

Employment Type: Can be employed directly by the company or through third-party agencies, often working on a part-time or contractual basis.

KEY FIGURES TO RETAIN

Interviews with 2000+ beauty advisors in 3 countries in Asia revealed:



75%

of the brand promoters were employed through third-party agencies globally, and only 2-3 countries had direct employees.



**18-25
YEARS**

The majority of the brand promoters are females in the age group of 18-25 years. They are usually single and have completed the minimum compulsory education (high school).

Main Risks Identified

During Recruitment

1. **Stereotypes** and unrealistic standards of beauty
2. Preference for certain age groups and physical attributes
3. **Discriminatory** hiring practices based on looks, race, and ethnicity

At the workplace

1. **Verbal abuse and sexual harassment:** By managers and clients
2. **Excessive Working Hours:** Regular work days exceeding 10 hours and involuntary overtime.
3. **Compensation gaps:** Legal minimum wages without overtime compensation, lack of pay slips and clarity on wage components, no living wage despite bonuses.
4. **Ambiguity in employment relations:** Confusion about the legal employer and entitlements, lack of written contracts in some cases

A Company Case Study, L'Oréal's Beauty Advisors



Action Plan:

Based on the study results, L'Oréal HQ and local teams took namely the following steps:

- All BAs were provided with written contracts
- They were made aware of the existence of the SpeakUp channel
- Upskilling the BAs on gender-based violence



Beyond this country, A four-pillar Group action plan was developed aiming at:

- Strengthening contractual relationships with agencies (see supply chain management for more information);
- Rolling out additional worker voice pilots: including in Asia involving 1,700 Beauty Advisors which should help inform a global approach to this issue;
- Training: sexual harassment training is being deployed for Beauty Advisors and will be integrated into the new Group retail tool dedicated to Beauty Advisors;
- Guaranteeing a living wage: Beauty Advisors will be included into the Group strategy on living wage

Main Recommendations

1. **Extend Code of Conduct** to Include brand promoters and third-party workers in the company's code of conduct and develop specific standards for brand promoters
2. **Conduct Risk Assessments** to Identify high-risk geographies and activities, collect and analyze data on brand promoters globally and develop a heatmap to highlight high-risk areas
3. **Strengthen Contracts and Monitoring of Labour Agencies:** Include clauses in contracts mandating adherence to human and labour rights standards and regularly monitor third-party compliance
4. **Improve Training Programs:** Train brand promoters on their legal rights and benefits and provide training on responsible recruitment, harassment, discrimination, and occupational health and safety
5. **Enhance Grievance Mechanisms:** Ensure accessible, transparent, and effective grievance mechanisms and train supervisors in grievance handling and redressal
6. **Ensure Fair Compensation:** Conduct analysis to ensure living wages for brand promoters and address compensation gaps and ensure legal compliance
7. **Reduce Involuntary Overtime:** Ensure overtime is consensual and adequately compensated



Q&A

Download the Guidelines

theconsumergoodsforum.com/publications/guidelines-for-responsible-management-of-brand-promoters/



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Thank you

