



## **Revlon International Corporation – United Kingdom Branch**

### **UK Modern Slavery Act Statement**

#### **Purpose of Statement**

This Modern Slavery Statement (“Statement”) is made by Revlon International Corporation – United Kingdom Branch (“Revlon UK”), a U.K. branch of Revlon International Corporation, a U.S. corporation (“Revlon”). This Statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes Revlon UK’s slavery and human trafficking statement for the year from 1 January 2021 to 31 December 2021.

#### **Revlon UK’s Commitment**

Revlon UK is committed to the protection of human rights and the prevention of slavery and human trafficking throughout our organisation and supply chains through responsible supply chain management and ethical manufacturing practices. We uphold international labour laws and require the same of our third-party partners. We prohibit illegal child labour, forced labour, and all forms of human exploitation and unacceptable treatment of workers in our business, which is reinforced in our policies and training. At Revlon UK, we are committed to improving our understanding of modern slavery risks in our operations and supply chain and taking effective measures to mitigate these risks.

#### **Revlon UK’s Structure, Operations and Supply Chains**

Revlon UK markets, distributes and sells skin care, nail products and cosmetics in the United Kingdom under the Revlon, Revlon Professional, Mitchum, Cutex, CND, and American Crew brands. These products are sold to wholesalers and direct to retailers through various channels such as pharmacy, discount stores, grocery and department stores. Revlon UK also sells Revlon Professional products to independent salons and mass outlet chains. In addition, Revlon UK contracts with local distributors and online retailers to sell certain products in the UK.

Revlon UK has an office in London and a distribution centre in Stone (the “Distribution Centre”), where finished goods imported from overseas are prepared for distribution. One hundred percent (100%) of the finished products that Revlon UK sells in the UK are imported from Revlon owned and operated manufacturing facilities in the United States, Spain, South Africa and Italy. These factories operate in compliance with local laws, as well as Revlon’s Code of Conduct and Business Ethics. Revlon UK does not contract with any local third-party manufacturers for finished products sold in the UK.

Revlon UK also partners with many local suppliers to conduct its business. This includes office space rental, office security, facilities services, utility providers, machine and equipment maintenance, cleaning services, packaging, information technology services, transportation of goods, digital merchandising consultants, visual merchandising products, and marketing and regulatory consultants.

As of the date of this Statement, Revlon UK employs approximately 112 employees. These employees are based in the London office, Distribution Centre, nation-wide field locations, retail stores, and airports. A

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small percentage of the workforce is engaged under a short-term contract and is engaged directly by Revlon UK.

## **Risks of Modern Slavery**

Revlon UK has conducted a high-level analysis of modern slavery and human trafficking risks in its operations and supply chains during the 2021 reporting period. Revlon UK recognizes that risks of modern slavery may exist in the following areas:

- **Employees engaged under short-term contracts:** Revlon UK understands that workers employed on a short-term basis may lack certain protections and may be vulnerable to modern slavery.
- **Third party raw materials, chemicals and packaging components:** Modern slavery risks may be associated with long and complex supply chains, countries of origin and use of low-wage labour for these raw materials and components. As set out below, Revlon UK has processes in place to mitigate the risks of modern slavery and human trafficking practices in its direct supply chain. However, there remains some modern slavery risk from indirect suppliers retained by third parties who contract with Revlon UK;
- **Third party distribution, transport and logistics:** These industries are associated with higher risks of modern slavery due to time and cost pressures as well as use of low-wage labour. As a result, the actions or inactions of Revlon UK's third parties in these industries could create modern slavery and human trafficking risks;
- **Indirect services:** Indirect services, including utility providers, machine and equipment maintenance, office security and facilities services, and cleaning services, may be associated with modern slavery and human trafficking risks due to the use of low wage labour; and
- **Budget limitations, high demand for our product, and tight delivery timeframes:** These factors may impose time and cost pressures on Revlon UK's supply chain, which also may contribute to modern slavery and human trafficking risks.

In future reporting periods, Revlon UK will evaluate industry best practices to refresh and improve risk mapping in its operations and supply chains.

## **Actions Taken by Revlon UK to Assess and Address Modern Slavery and Human Trafficking**

### **Risks**

Revlon UK is committed to complying with laws, establishing policies, delivering training and taking any other necessary action to help eliminate modern slavery and human trafficking.

## **Revlon Policies and Training**

### **Policies**

***Employees:*** Revlon's Code of Conduct and Business Ethics ("Code of Conduct") governs the principles, standards and expectations that guide Revlon's business and the behaviour of its people. The Code of Conduct covers topics such as anti-bribery and corruption, competition law, data privacy, equal

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employment opportunities, discrimination, bullying and harassment, and workplace health and safety, and specifically prohibits the use of child labour, forced labour and all other forms of human exploitation and unacceptable treatment of workers. All Revlon employees globally, including employees of Revlon UK, are expected to read, understand and certify to the Code of Conduct once they begin their employment and commit to upholding these high standards annually throughout their employment. In addition, Revlon has an Anti-Harassment / Anti-Discrimination Policy, which highlights Revlon's commitment to providing a work environment in which everyone is treated with dignity, courtesy, and respect.

**Third Parties:** Revlon UK has zero tolerance to slavery and human trafficking. To ensure those in our supply chain and other third parties comply with our values and ethics, Revlon UK requires its third-party partners to comply with Revlon's Third Party Code of Conduct ("Third Party Code"), which includes a commitment to comply with global human rights, labour standards, environmental laws and ethical business practices, as well as with all applicable laws, including those relating to prohibitions on the use of forced labour, child labour, and human trafficking. All third-party partners are required to report actual or alleged violations of the Third Party Code or applicable law to Revlon Compliance through the hotline or by email so that Revlon UK can take any necessary action. Callers can make anonymous reports through the hotline. Revlon UK also requires its third-party partners to take reasonable steps to ensure that the Third Party Code is communicated throughout their organization and made available to all of their employees and subcontractors who will work with Revlon UK or in connection with Revlon UK's business. Any material failure to comply with our Third Party Code may ultimately result in the termination of Revlon UK's relationship with the supplier.

## Training

Revlon and its affiliates, including Revlon UK, provide a range of internal training courses for employees around ethical behaviour. On an annual basis, Revlon conducts global employee training on and requires employees to certify to its Code of Conduct and Business Ethics. Revlon also conducts an annual employee training program globally on its Anti-Harassment / Anti-Discrimination Policy to promote dignity and respect in the workplace.

In future reporting periods, Revlon UK will evaluate industry best practices to continue to drive awareness and education of modern slavery among its employees.

## **Speaking Up**

Revlon UK has a formal grievance and whistle-blower reporting mechanism that enables employees and other stakeholders, including third parties, to raise issues of suspected human rights and other violations, including modern slavery and human trafficking concerns. Revlon employees and third parties are expected to raise questions or concerns, including potential violations of the Code of Conduct, Third Party Code or applicable law to Revlon Compliance. Employees can also raise concerns or allegations of misconduct to a supervisor, human resources or the legal department. Revlon's Compliance hotline is available to employees, other stakeholders and third parties 24/7 and in many languages and reports can be made anonymously. Revlon Compliance conducts confidential investigations of such reports received

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and prohibits retaliation of any kind against any individual who submits a complaint in good faith and/or cooperates with an investigation.

## **Contracting with Third Parties**

Revlon UK has established business practices to retain and maintain ethical third-party relationships in order to conduct business with organizations that respect human rights, comply with their legal obligations and treat employees fairly. The local procurement team validates potential providers, including assessing their operational capability, industry reputation and economic stability, which helps to identify potential modern slavery, human trafficking and other risks. Revlon UK typically engages in a competitive request for proposal (RFP) process, whereby third parties are selected based on compliance with our standards, pricing, account management structure and other value adds. Revlon's Third Party Code of Conduct gives Revlon the ability to require third parties to complete a due diligence or self-assessment questionnaire; cooperate with an on-site audit; or provide proof of recent audits conducted. As such, Revlon UK may conduct financial audits or on-site audits and site visits to new vendor manufacturing locations to assess compliance with local laws before choosing a vendor as well as during the lifecycle of the business relationship with the vendor.

Once the third party is selected, Revlon UK follows an established contracting process, which includes requiring the third party to comply with Revlon's Third Party Code (as described above) and other business terms. Generally, our contractual agreements with third parties require them to comply with all applicable laws relating to the manufacture, packaging, labelling, supply, shipment and transportation of our products, which includes, among other things, prohibitions on the use of forced labour and human trafficking.

After the contract is executed, Revlon UK conducts onboarding and integration planning, which includes detailed documents outlining quality expectations, health and safety and security practices, along with other business processes and requirements.

During the lifecycle of the third-party contract, Revlon UK regularly conducts business reviews which consider quality, safety, service, review of key performance indicators, and confirming that suppliers are operating under lawful conditions, including those relating to slavery and human trafficking.

## **Continuous Improvement**

Revlon and its affiliates, including Revlon UK, are committed to continuously reviewing policies and practices to actively address risks to people in our business and supply chains, including the risk of modern slavery and human trafficking. We are in the process of enhancing our responsible and ethical sourcing practices, updating relevant policies and procedures, refreshing supply chain risk mapping, and revising third party due diligence and monitoring practices.

We are committed to adhering to the highest ethical standards and complying with all applicable laws and regulations. We act with integrity and honesty and require our third parties to do the same.

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## Assessment of Effectiveness

We measure the effectiveness of our efforts to combat modern slavery by continuously assessing the policies and practices we have in place and identifying areas of improvement. This assessment will include our established processes to identify, contract, onboard and monitor our third parties, who must commit to our ethical principles and raise concerns to the Company. As part of this process, we regularly monitor our Compliance hotline to identify, investigate and remediate any modern slavery concerns.

We will continue to partner with our third parties to improve awareness of and mitigate modern slavery and human trafficking risks in their operations and supply chains. This includes ongoing assessment of industry best practices and cutting-edge risk management tools, as well as collaborating with our suppliers to design traceability approaches and map material sources to reduce modern slavery risk. In addition, Revlon UK will explore adding a specific modern slavery and human trafficking training element to its employee training program, in addition to its existing training program, as described above.

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This statement has been approved by authorized representatives of Revlon International Corporation – United Kingdom Branch.

Signed on behalf of Revlon International Corporation – United Kingdom Branch.



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Victoria Dolan  
Official Representative and Chief Financial Officer

Date: June 30, 2022



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Charles Waters  
President, International  
Date: June 30, 2022