



**Revlon International Corporation – United Kingdom Branch  
Elizabeth Arden (U.K.), Ltd.**

**UK Modern Slavery Act Statement**

**Purpose of Statement**

This Modern Slavery Statement (“Statement”) is made jointly by Revlon International Corporation – United Kingdom Branch (“Revlon UK”) and Elizabeth Arden (U.K.), Ltd. (“Elizabeth Arden UK,” together, the “Revlon UK Entities”), which are both subsidiaries of Revlon International Corporation, a U.S. company (“Revlon”). This Statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes the Revlon UK Entities’ modern slavery and human trafficking statement for the year from 1 January 2023 to 31 December 2023 (the “Reporting Period”).

**Revlon UK Entities’ Commitment**

The Revlon UK Entities are committed to the protection of human rights and the prevention of slavery and human trafficking throughout our organisations 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. The Revlon UK Entities 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, Crème of Nature, 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 purchases marketing materials from global suppliers that accompany the finished products sold in the UK.

Revlon UK 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.

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As of the date of this Statement, Revlon UK employs approximately 100 employees. These employees are based in the London office, Distribution Centre, nation-wide field locations, retail stores, and airports. A small percentage of the workforce is engaged under a short-term contract (such as maternity leave cover) and is engaged directly by Revlon UK. Revlon UK also engages a number of workers on casual contracts for certain warehouse projects.

## **Elizabeth Arden UK's Structure, Operations and Supply Chains**

Elizabeth Arden UK markets, distributes and sells fragrances, skin care and cosmetics in the United Kingdom under the Elizabeth Arden, Britney Spears, Christina Aguilera and Juicy Couture brands. These products are sold to wholesalers and direct to retailers through various channels such as pharmacy, discount stores, grocery, department stores and travel retail. In addition, Elizabeth Arden UK contracts with local distributors and online retailers to sell certain products in the UK.

Elizabeth Arden 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 Elizabeth Arden 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. Elizabeth Arden UK does not contract with any local third-party manufacturers for finished products sold in the UK. Elizabeth Arden UK also purchases marketing materials from global suppliers for the finished products sold in the UK.

Elizabeth Arden UK 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, Elizabeth Arden UK employs approximately 155 employees. These employees are based in the London office, Distribution Centre, nation-wide field locations, retail stores, and airports. A small percentage of the workforce is engaged under a short-term contract (such as maternity leave cover) and is engaged directly by Elizabeth Arden UK. Very occasionally, Elizabeth Arden UK engages a small number of workers on casual contracts for consultants in retail stores to provide short term cover when staff are attending training or other off-site events.

## **Risks of Modern Slavery**

The Revlon UK Entities have identified potential modern slavery risks in the areas listed below and have implemented ways to manage those risks.

- **Employees engaged under short-term or casual contracts:** Employees or workers employed on a short-term basis or with casual contracts may in theory lack certain protections and may be vulnerable to modern slavery. However, in practice, the employees under short-term contracts are entitled to the same benefits, employee protections, and policies as the permanent employees of the Revlon UK Entities; and those engaged under casual worker contracts are

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entitled to appropriate worker rights and protections, such as those relating to health and safety, data protection, paid annual leave and the national minimum wage.

- 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, the Revlon UK Entities have processes in place to mitigate the risks of modern slavery and human trafficking practices in their direct supply chain. However, there remains some modern slavery risk from indirect suppliers retained by third parties who contract with the Revlon UK Entities.
- 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 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.
- Budget limitations, high demand for our product, and tight delivery timeframes: These factors may impose time and cost pressures on the Revlon UK Entities' supply chain, which also may contribute to modern slavery and human trafficking risks.

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

The Revlon UK Entities are committed to complying with laws, establishing policies, delivering training and regularly evaluating other potential actions to help eliminate modern slavery and human trafficking.

### **Policies and Training for Employees**

#### Policies

Revlon's employee 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 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 the Revlon UK Entities, are expected to read, understand and certify the Code of Conduct when 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.

#### Training

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Revlon and its affiliates, including the Revlon UK Entities, provide a range of internal training courses for employees around ethical behaviour. The Revlon UK Entities have an e-learning portal available to employees, which has courses on business ethics and modern slavery awareness.

On an annual basis, including during the Reporting Period, Revlon employees are required to complete Revlon's Code of Conduct training which highlights key topics in Revlon's Code of Conduct, including human rights, forced labour and child labour. As part of the Code of Conduct training, employees are required to certify that they have reviewed and comply with the Code of Conduct.

In addition, UK suppliers that import materials and products into the United States for Revlon are required to take Revlon's Forced Labour Supplier Training, which describes Revlon's position against the use of forced labour, child labour, modern slavery, human trafficking and all other forms of human exploitation and unacceptable treatment of workers. This training, which is also available on Revlon's public-facing website for other Revlon suppliers, provides information to help suppliers identify and mitigate forced labour in their supply chains.

## **Revlon Policies and Processes for Third Parties**

### Policies

The Revlon UK Entities have zero tolerance for slavery and human trafficking. The Revlon UK Entities require 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.

The Third Party Code provides that Revlon will only conduct business with organizations that respect human rights and are fair to their employees, and that Revlon and the Revlon UK Entities prohibit third party partners from:

- Using forced labour, slavery, or prison labour as defined by local law;
- Using child labour or employing any person under the age of 15 (or 14 where the law of the country permits) or under the minimum age for employment in the country, whichever is greater;
- Using corporal punishment or other mental or physical discipline;
- Tolerating the illegal harassment of workers, sexual or otherwise; or
- Discriminating based upon race, creed, colour, religion, gender, gender identity, sexual orientation, age, ethnicity, national origin, citizenship, disability, marital, partnership or familial status, veteran/military status, domestic violence victim status, or any other characteristic protected by law.

The Third Party Code requires that third party partners allocate appropriate resources and training to manage ethics and compliance risks, and continually monitor and improve their ethics and compliance program.

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The Revlon UK Entities require their third party partners to take reasonable steps to ensure that the Third Party Code is communicated throughout their organization and made available to their employees and subcontractors who will work with the Revlon UK Entities or in connection with the Revlon UK Entities' business. Any material failure to comply with the Third Party Code may ultimately result in the termination of the relationship with that third party.

Finally, third party partners are required to report actual or alleged violations of the Third Party Code or applicable law to Revlon Compliance so that Revlon and/or the Revlon UK Entities can take any necessary action.

## Due Diligence Processes

On a local level, the Revlon UK Entities validate potential third party partners, including assessing their operational capability, industry reputation and economic stability, which helps to identify potential modern slavery, human trafficking and other risks. Depending on level of spend, the Revlon UK Entities may engage in a competitive request for proposal (RFP) process, whereby third parties are selected based on compliance with Revlon's standards, pricing, account management structure and other value adds.

Generally, the Revlon UK Entities' due diligence processes include risk assessments, which may include completion of a due diligence questionnaire and background check. During the Reporting Period, Revlon implemented an enhanced due diligence screening tool for conducting background checks on third parties, which includes human rights, forced labour and child labour laws. This new tool will continue to improve the Revlon UK Entities' ability to conduct due diligence and monitor third parties based upon potential risk to the organization.

## Contracting and Monitoring Processes

Once a third party is selected, the Revlon UK Entities follow a contracting process. Generally, contractual agreements with third parties require them to comply with the Third Party Code, as well as all applicable laws relating to the manufacture, packaging, labelling, supply, shipment and transportation of our products.

After the contract is executed, the Revlon UK Entities conduct onboarding and integration planning, which may include outlining quality expectations, health and safety and security practices, along with other business processes and requirements.

During the lifecycle of the third-party contract, the Revlon UK Entities conduct business reviews which consider quality, safety, service, review of key performance indicators, and confirm that suppliers are operating in accordance with applicable laws and Revlon's Third Party Code.

In addition, Revlon's Third Party Code also gives the Revlon UK entities the ability to require third parties to cooperate with an on-site audit or provide proof of recent audits conducted. As such, the Revlon UK Entities may conduct financial, social and/or operational audits and site visits to new vendor manufacturing locations to assess compliance with local laws before choosing a vendor, as well as

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during the lifecycle of the business relationship with the vendor. For example, during the Reporting Period, Revlon contracted with a reputable third party auditing firm to conduct a social and operational audit on one of Revlon's suppliers in China that produces component parts for its cosmetics, which are incorporated into Revlon's finished products. The audit did not identify any child or forced labour activity.

## **Speaking Up**

Revlon and the Revlon UK Entities have 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.

The Revlon UK Entities have a direct, toll-free Help Line number and a Web Form, which can be accessed by scanning a QR Code, to make it easier for employees and third parties to contact Revlon Compliance.

Revlon's Help Line and Web Form are available to employees, other stakeholders and third parties 24/7. Reporters who call the Help Line can request to speak in a variety of languages. In addition, reports can be made through the Help Line and Web Form anonymously. Revlon Compliance conducts confidential investigations of reports received and prohibits retaliation against any individual who submits a complaint in good faith and/or cooperates with an investigation.

## **Continuous Improvement**

As part of our commitment to manage modern slavery risks, Revlon and its affiliates, including the Revlon UK Entities, are committed to reviewing relevant policies, practices and training and we continue to evaluate ways to enhance our responsible and ethical sourcing practices and third party risk management. 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.

## **Assessment of Effectiveness**

We measure the effectiveness of our efforts to combat modern slavery by assessing the policies, practices and training we have in place. This assessment includes review of our established processes to identify, contract, onboard and monitor third parties. As part of this process, we regularly monitor our Help Line and Web Form to identify, investigate and remediate any potential 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. In addition, the Revlon UK Entities intend to explore ways to further enhance employee awareness regarding modern slavery and human trafficking.

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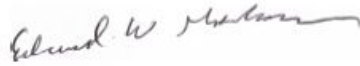
This statement has been approved by the board of directors of Revlon International Corporation on June 27, 2024.

Signed on behalf of Revlon International Corporation.



Seth Fier, Director, SVP Deputy General Counsel

Date: June 27, 2024



Edward W. McCormick, Director, Chief Financial Officer

Date: June 27, 2024



Charles Waters, Director, President International

Date: June 27, 2024