

Revion 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 2024 to 31 December 2024 (the "Reporting Period").

Revion 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 sells direct to consumers through its website, and contracts with local distributors and online retailers to sell its 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 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 90 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 and is engaged directly by Revlon UK.

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 sells direct to consumers through its website, and contracts with local distributors and online retailers to sell its 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 130 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 and is engaged directly by Elizabeth Arden UK.

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.

- <u>Employees engaged under short-term contracts</u>: Workers employed on a short-term basis may lack certain protections and may be vulnerable to modern slavery. However, these contracted employees are entitled to the same benefits, worker protections, and policies as permanent employees.
- 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.
- <u>Indirect services</u>: 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.

During the Reporting Period, Revlon formalized its whistleblower and Speak Up program into an internal Whistleblower Policy that establishes guidelines for reporting and investigating concerns that are raised and affirms Revlon's commitment to preventing and protecting employees from retaliation (see below for further detail).

Training

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. During the Reporting Period, Revlon contracted with a new training vendor to expand its training content, including for Code of Conduct training and training on other topics, such as forced labour and modern slavery. The 2025 Code of Conduct training will be rolled out globally, including to the Revlon UK entities, in May 2025.

In addition, as part of Revlon's membership in the U.S. Customs and Border Protection Customs-Trade Partnership Against Terrorism (CTPAT), 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.

During the Reporting Period, Revlon also engaged an independent law firm to prepare targeted training covering best practices for compliance with modern slavery regulations, signs of modern slavery and risk factors, and the importance of conducting risk assessments and due diligence on third parties. This training will be provided to key employees, including Revlon UK Entities' employees, with responsibilities in managing and overseeing Revlon's procurement and supply chain during the next reporting period.

New ESG Working Group

During the Reporting Period, Revlon established an Environmental, Social, and Governance (ESG) working group to enhance our commitment to sustainable and ethical business practices. The ESG working group is composed of cross-functional leaders from research and development, supply chain, legal, compliance, finance and human resources, ensuring a comprehensive and collaborative approach to our sustainability, governance and third party risk management initiatives.

Revion 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.

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

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 continued to use an enhanced due diligence screening tool for conducting background checks on third parties, which includes human rights, forced labour and child labour laws. This tool has improved

Revlon's ability to conduct due diligence and monitor third parties based upon potential risk to the organization.

During the Reporting Period, Revlon engaged a consultant to evaluate its third-party population to ensure that Revlon has an accurate picture of its third-party risks. As part of this review, Revlon established a risk rating methodology that measured risks based on several key variables. Based on this analysis and consistent with risk management best practices, Revlon tailored its risk mitigation strategy to focus resources on those third parties that presented elevated risks.

Revlon also continued to evaluate further improvements to its third party risk management program, including implementing new automated tools to enhance risk models, workflow capabilities, and supply chain analysis.

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 during the lifecycle of the business relationship with the vendor.

Revlon plans to conduct several third-party audits in the next Reporting Period, guided by a risk analysis and the strategic allocation of audit resources.

Speak Up Program

Revlon has a formal grievance and whistle-blower reporting mechanism that allows employees and other stakeholders, including third parties, to raise ethics concerns. Individuals can submit reports through our Help Line or Web Form, which are available 24/7. Reporters can request to speak in various languages and can make reports anonymously. Revlon Compliance conducts confidential investigations of all reports and strictly enforces its prohibition of retaliation against anyone who submits a complaint in good faith or cooperates with an investigation.

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. In addition to using the Help Line or Web Form, employees can also report concerns or allegations of misconduct to a supervisor, human resources, or the legal department.

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, complying with all applicable laws and regulations, and acting with integrity and honesty, while requiring our third party partners to do the same.

Assessment of Effectiveness

We evaluate the effectiveness of our efforts to combat modern slavery and forced labour by reviewing our policies, practices, and training, as well as addressing any relevant issues or risks that arise. We continuously assess risk by reviewing our processes for identifying, contracting, onboarding, and monitoring third parties. As part of this commitment, we regularly monitor our Help Line and Web Form to identify, investigate, and address any potential modern slavery concerns.

To this end, during the Reporting Period, Revlon has further engaged a law firm specializing in compliance and third-party risk management. This firm is reviewing Revlon's various controls surrounding modern slavery risks, among others, and will continue to recommend improvements as required. As part of this effort, and as previously mentioned, Revlon is enhancing its due diligence processes, with an eye towards developing a robust enhanced due diligence process for high risk third parties.

We will continue to collaborate with our third party partners to raise awareness and mitigate modern slavery and forced labour risks in their operations and supply chains. This effort includes ongoing assessments of industry best practices and advanced risk management tools. We will also continue to enhance employee awareness regarding modern slavery, forced labour and human trafficking.

This statement has been approved by the board of directors of Revlon International Corporation.

Signed on behalf of Revlon International Corporation.

Seth Fier, Director Date: 05/07/2025

Edward W. McCormick, Director

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Date: 05/07/2025

Charles Waters, Director

Date: 05/07/2025