

Revlon Canada Entities – Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act Statement 2023

Purpose of Statement

This Statement is made jointly on behalf of Revlon Canada Inc. and Elizabeth Arden (Canada) Limited, both indirect subsidiaries of Revlon Consumer Products LLC (“**Revlon**”), pursuant to the *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Supply Chains Act**”). Revlon Canada Inc. and Elizabeth Arden (Canada) Limited (together, “**Revlon Canada**” or “**Revlon Canada Entities**”) are both incorporated in Canada under the Canada Business Corporations Act, with their joint office located in Mississauga, Ontario, Canada.

This Statement describes the actions taken by Revlon Canada to identify, assess, and address the risk of forced labour and child labour across our operations and supply chains in the twelve months ending 31 December 2023 (“**Reporting Period**”).

For background, Revlon Canada’s ultimate parent company, Revlon Consumer Products LLC, filed for reorganization under Chapter 11 of the United States Bankruptcy Code in June of 2022 and successfully restructured and emerged from bankruptcy during the Reporting Period in May 2023.

Revlon Canada’s Commitment

Revlon Canada is committed to the protection of human rights through responsible supply chain management and ethical manufacturing practices. We uphold Canadian labour laws and require our third party partners to comply with applicable labour laws. We prohibit 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 Canada, we are committed to improving our understanding of forced labour and child labour risks in our operations and supply chain and taking effective measures to mitigate these risks.

Revlon Canada’s Structure, Activities and Supply Chains

Legal structure and activities

As described above, the Revlon Canada Entities are Revlon Canada Inc. and Elizabeth Arden (Canada) Limited, which are indirect subsidiaries of Revlon Consumer Products LLC.

Revlon Canada Inc. markets and sells hair products, nail products and cosmetic products in Canada under the Revlon, Revlon Professional, American Crew, Almay, Cutex, Mitchum, Sinful Colors, and CND brands (the “**Revlon Products**”). Elizabeth Arden (Canada) Limited markets and sells fragrances, skin care, and cosmetic products in Canada under the Elizabeth Arden brand and other licensed fragrance brands.

The Revlon Canada Entities sell products directly to retailers through various channels such as pharmacies, discount channels, grocery and department stores. Revlon Canada Inc. sells Revlon Professional products to independent salons and mass outlet chains. In addition, Revlon Canada Inc. contracts with local distributors to sell the Revlon Products in the local market.

The Revlon Canada Entities have one facility in Mississauga, Ontario, Canada, which includes a distribution centre where finished goods imported from the U.S. and overseas are prepared for distribution, and where reverse logistics (returns from customers) are handled.

As of the date of this Statement, the majority of Revlon Canada employees are permanent employees and are based in the Mississauga facility, interstate field locations, retail stores (for in-store promotional activity) or are remote workers. A small percentage of the workforce (usually coverage for maternity leave or short-term project work) is employed under a short-term contract and these employees are

engaged either directly or through a recruitment agency. Certain Revlon Canada employees that work in the distribution centre are unionized under Unifor Local 323. Revlon Canada partners with a third party staffing agency to hire temporary workers.

Revlon Canada's supply chains

Revlon sources raw materials and component parts globally to manufacture its finished products, which are then imported into Canada by Revlon Canada. The vast majority of the finished products that Revlon Canada sold in Canada over the Reporting Period were imported from factories owned and operated by Revlon in the United States, Mexico, Spain and South Africa. A small percentage of the finished goods that Revlon Canada sold in Canada over the Reporting Period were sourced from third party manufacturers. These manufacturers are primarily located in the United States and Europe, with a small percentage in China.

Revlon Canada contracts with one third party manufacturer in Canada to manufacture certain makeup products. Over the Reporting Period, this third party manufactured eye shadows and lip colour for Revlon Canada.

Revlon Canada also partners with different local suppliers and vendors to conduct its business. This includes office space rental, utility providers, machine and equipment maintenance, cleaning services, packaging, labelling, promotional displays, holiday gift sets, transportation of goods, in-store merchandising services, and marketing, tax, and regulatory consultants.

Risks of Forced Labour and Child Labour

Revlon Canada has identified potential forced and/or child labour risks in the areas listed below and has implemented ways to manage those risks.

- Employees engaged under short-term contracts and/or through recruitment agencies: Revlon Canada understands that workers employed on a short-term basis may lack certain protections and be vulnerable to forced labour and child labour. Agencies may also charge workers recruitment fees. However, Revlon Canada considers that the forced labour and child labour risks in its operations associated with short-term employees are mitigated by the following:
 - The employees are engaged in Canada, where there are strong worker protections;
 - The employees are paid at or above award rates; and
 - As set out below, Revlon Canada has appropriate policies and procedures in place to protect its employees and contract employees, and it conducts due diligence on third parties.
- Third party raw materials, chemicals and packaging components: Forced labour and child labour 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 stated above, Revlon sources raw materials and component parts globally to manufacture its finished products, which are then imported into Canada by Revlon Canada. Revlon Canada has processes in place to mitigate the risks of forced labour and child labour practices in its direct supply chain, as described below.
- Third party manufacturing facilities: Revlon Canada has less oversight over third party manufacturing facilities than it does over Revlon-owned and operated facilities that comprise the majority of its supply chain. Taking a risk-based approach, Revlon Canada identified that a small percentage of the finished goods Revlon Canada sold in Canada over the Reporting Period were sourced from a third party manufacturer in China, where the risk of forced labour and child labour may be higher. There is some risk that the third party manufacturer could have forced labour or child labour practices through its direct or indirect supply chain. As described below, Revlon Canada has processes in place to mitigate the risks of forced labour and child labour practices through its third party manufacturers, as described below.

- Third party distribution, transport, and logistics: These industries are associated with higher risks of forced labour and child labour due to time and cost pressures as well as use of low-wage labour. As a result, the actions or inactions of Revlon Canada's third parties in these industries could create forced labour and child labour risks. As described below, Revlon Canada has processes in place to mitigate forced labour and child labour risks.
- Indirect services: Indirect services, including utility providers, machine and equipment maintenance, packaging materials, promotional displays, and cleaning services, may be associated with higher forced labour and child labour risks due to the use of low wage labour in these industries. As described below, Revlon Canada has processes in place to mitigate forced labour and child labour risks.
- Budget limitations, high demand for our product, and tight delivery timeframes: These factors may impose time and cost pressures on Revlon Canada's supply chain, which also may contribute to forced labour and child labour risks. As described below, Revlon Canada has processes in place to mitigate such risks.

Revlon Canada's Policies, Due Diligence Processes and Training

Revlon Canada is committed to helping employees assess risk, identify suspicious activity, and perform due diligence on third parties to combat forced labour and human trafficking.

Revlon Canada's Policies

Employees: Employees in Canada must comply with Revlon's employee Code of Conduct and Business Ethics ("**Code of Conduct**"). The Code of Conduct governs the principles, standards and expectations that guide Revlon Canada's business and the behaviour of its people. It specifically prohibits the use of child labour, forced labour and all other forms of human exploitation and unacceptable treatment of workers. It also covers topics such as anti-bribery and corruption, competition law, data privacy, equal employment opportunities, discrimination, bullying and harassment, and workplace health and safety. All Revlon employees globally are expected to read, understand, and certify their commitment to upholding the high standards of the Code of Conduct when they begin their employment and annually throughout their employment. Violations of the Code of Conduct may result in discipline, up to and including termination.

Employees in Canada must also comply with Revlon's **Anti-Discrimination and Anti-Harassment Policy**, which highlights Revlon's commitment to providing a work environment in which everyone is treated with dignity, courtesy, and respect.

Third Parties: Revlon Canada requires its third party partners to comply with Revlon's Third Party Code of Conduct ("**Third Party Code**"), which states that Revlon will only conduct business with organizations that respect human rights and are fair to their employees, and that Revlon prohibits its 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 disciplinary actions;
- 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 also requires that third party partners allocate appropriate resources to managing ethics and compliance risks, including a training program that educates their employees about how to make ethical decisions in compliance with all applicable laws. It also requires that all third party partners continually monitor and improve their ethics and compliance management system.

Third party partners are required to report actual or alleged violations of the Third Party Code or applicable law to Revlon Compliance through Revlon's Help Line, Web Form or by email so that Revlon can take any necessary action. Revlon Canada 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 their employees and subcontractors who will work with Revlon Canada or in connection with Revlon Canada's business. Any material failure to comply with Revlon's Third Party Code may result in the termination of Revlon Canada's relationship with the supplier.

Training

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.

In addition, Canadian suppliers that import products into the United States on behalf of 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. The training, which is available on Revlon's website to all suppliers, provides information to help suppliers identify and mitigate forced labour in their supply chains.

Assessment and Management of Risk

Revlon Canada is committed to taking all necessary actions to help eliminate forced labour and child labour in its operations and supply chains.

Speaking Up

Revlon maintains a Help Line and Web Form for formal grievances and whistle-blower reporting that enables employees and other stakeholders, including third parties, to raise issues of suspected human rights and other violations. 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 Help Line is available to employees, other stakeholders and third parties 24/7 and in many languages. Reports can be made through the Help Line and Web Form anonymously.

Revlon Compliance conducts confidential investigations of such reports received and prohibits retaliation of any kind against any individual who submits a complaint in good faith and/or cooperates with an investigation.

Third Party Due Diligence and Contracts

During the Reporting Period, Revlon Canada followed existing processes to conduct business with organizations that respect human rights and are fair to their employees.

When looking for a new supplier or vendor, Revlon Canada typically engages in a competitive request for proposal ("RFP") process, whereby third parties are selected based on a scorecard approach to assess compliance with our standards, pricing, account management structure and other value adds. Generally, Revlon's due diligence processes include risk assessments, which may include completion of a due diligence questionnaire and background check.

When a third party is selected, Revlon Canada typically follows an established contracting process, which includes requiring the third party to agree to comply with Revlon's Third Party Code (as described above) and other business terms. Our contractual agreements with third parties also 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 a contract with a third party is executed, Revlon Canada typically conducts detailed onboarding and integration planning, which may include the completion of detailed documents outlining health and safety and security practices, along with other business processes and requirements.

As a matter of practice, during the lifecycle of the third party contract, Revlon Canada periodically conducts business reviews which consider safety, service, review of key performance indicators, and confirms that suppliers are operating under lawful conditions.

Under the Third Party Code, Revlon also has the right to conduct periodic audits and/or require proof of recent audits conducted on its third parties. During the Reporting Period, a U.S. Customs and Border Protection Supply Chain Specialist conducted an audit of Revlon Canada's third party manufacturer in Canada that produces makeup products for Revlon. The audit did not identify any child/forced labour activity. The third party manufacturer was required to implement operational corrective actions, such as an employee badge system to improve on-site security.

Continuous Improvement

As part of Revlon Canada's continued commitment to manage forced labour and child labour risks, Revlon periodically reviews its policies, practices and training. Revlon will 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 third parties that we do business with to do the same.

Remediation Measures

During the Reporting period, Revlon Canada did not identify any forced labour or child labour activity in our business or supply chains. As a result, it was not necessary for Revlon Canada to take any actions to remediate forced or child labour in its activities and supply chains, or potential losses of income to vulnerable families resulting from such actions.

Assessment of Effectiveness

Assessing the effectiveness of Revlon Canada's forced labour and child labour risk management involves a cross-functional partnership with internal stakeholders, including supply chain, procurement, finance, human resources, compliance and legal.

During the Reporting Period, this cross-functional group assessed relevant policies, practices and training. For example, Revlon continued to monitor its Help Line and Web Form cases to identify, investigate and remediate any forced labour and child labour concerns.

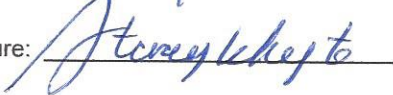
Approval and signatures

This report has been approved by the Boards of Directors of Revlon Canada Inc. and Elizabeth Arden (Canada) Limited, each on its own behalf.

Full name: Stacey Whyte

Title: VP, Sales, Canada

Date: May 29/24

Signature: 

I have the authority to bind Revlon Canada Inc. and Elizabeth Arden (Canada) Limited.

Disclaimer

The purpose of the Statement is to provide general information only and it is current as of the date of approval.