

## Revlon Australia's Modern Slavery Act Statement 2022

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### 1 Purpose of Statement

This Modern Slavery Statement ("**Statement**") is made on behalf of Revlon Australia Pty Limited (ABN 18 095 360 731) ("**Revlon Australia**") pursuant to the *Modern Slavery Act 2018* (Cth) (the "**Act**"). Revlon Australia is a proprietary company incorporated in Australia, with its registered office in Sydney, NSW.

This Statement sets out the actions taken by Revlon Australia to identify, assess, and address modern slavery risks across our operations and supply chains in the twelve months ending 31 December 2022 ("**Reporting Period**").

Revlon Australia is a reporting entity for the purposes of the Act as it was an Australian company with a consolidated revenue of over A\$100 million during the Reporting Period. Revlon Australia does not own or control any other entities.

For background, Revlon Australia's ultimate parent company filed for reorganization under Chapter 11 of the United States Bankruptcy Code during this Reporting Period. During this Reporting Period, Revlon Australia focused on maintaining its current operations and supply chain base to manage any potential business disruption from the Chapter 11 filing. In addition, Revlon Australia conducted employee training on modern slavery and implemented updates to Revlon's Third Party Code of Conduct to include additional requirements related to human rights, labour and employment rights during this Reporting Period.

In 2023, Revlon Australia's ultimate parent company successfully restructured and emerged from bankruptcy. Accordingly, Revlon Australia anticipates that its next modern slavery statement (for the twelve months ending 31 December 2023) will highlight further developments, including Revlon's updated employee policies and training along with enhancements to its third party risk management program.

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### 2 Revlon Australia's Commitment

Revlon Australia is committed to the protection of human rights through responsible supply chain management and ethical manufacturing practices. We uphold Australian labour laws and require our third party partners to comply with applicable labour laws. 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 Australia, we remain committed to improving our understanding of modern slavery risks in our operations and supply chain and taking effective measures to mitigate these risks.

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### 3 Revlon Australia's Structure, Operations and Supply Chains

#### Legal structure and operations

Revlon Australia is an indirect subsidiary of Revlon Group Holdings LLC ("**Revlon**"), formerly Revlon, Inc., and markets, distributes and sells fragrance, skin care, nail products and cosmetic products in Australia and New Zealand under the Revlon, Revlon Professional, CND and Elizabeth Arden brands. Revlon Australia does not own or control any subsidiaries. Revlon Australia sells Revlon and Elizabeth Arden products direct to retailers through various channels such as pharmacies, discount department stores, grocery and department stores. Revlon Australia sells Revlon Professional products to independent salons and mass outlet chains. In addition, Revlon Australia contracted with two local distributors to sell Revlon Professional and CND products in the local market.

Revlon Australia has two offices, one in Sydney and one in Canberra. Revlon Australia also has a distribution centre in Canberra (the "**Distribution Centre**"), where finished goods imported from overseas are prepared for distribution. Approximately 95% of the finished products that Revlon Australia sold in Australia and New Zealand over the Reporting Period were imported from factories owned and operated by Revlon 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. Approximately 5% of the finished goods Revlon Australia sold in Australia and New Zealand over the Reporting Period were sourced from Korea, China, and Japan. Revlon Australia also contracts with one third party manufacturer in Australia to

manufacture certain makeup products. Over the Reporting Period, the third party manufactured one product.

As of the date of this Statement, Revlon Australia employs 192 permanent employees (77% full time and 22% part time). These employees are based in the Sydney and Canberra offices, the Distribution Centre, interstate field locations, and retail stores (for instore promotional activity). Only 1% of the workforce (usually maternity leave covers or short-term project work) is employed under a short-term contract and these employees are engaged either directly or through a recruitment agency. In addition to Revlon Australia employees that work in the Distribution Centre, Revlon Australia partners on-site with a third party co-packer to prepare product for local distribution.

Revlon Australia continues to support the Australian beauty industry's charity of choice, Look Good Feel Better ("LGFB"), which is part of the Cancer Patients Foundation. Revlon Australia supports LGFB by donating products to cancer patients and through employees' fundraising efforts. In the Reporting Period, Revlon Australia donated funds to LGFB through the Super Lustrous campaign at Chemist Warehouse, in collaboration with the Delta Goodrem foundation.

### **Revlon Australia's supply chains**

As mentioned above, during the Reporting Period, Revlon Australia sourced only one item out of the approximately 2800 total items in its portfolio from a local third party manufacturer and imported approximately 95% of the remaining portfolio items from factories owned and operated by Revlon in the United States, Spain, South Africa and Italy.

Revlon Australia also partnered with many local and interstate suppliers to conduct its business. This includes office space rental, office security, utility providers, machine and equipment maintenance, cleaning services, packaging, transportation of goods, and marketing and regulatory consultants.

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## **4 Risks of Modern Slavery**

Revlon Australia has identified potential modern slavery 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 Australia understands that workers employed on a short-term basis may lack certain protections and be vulnerable to modern slavery. Agencies may also charge workers recruitment fees. However, Revlon Australia considers that the modern slavery risks in its operations associated with short-term employees are mitigated by the following:
  - The employees are engaged in Australia, where there are strong worker protections;
  - The employees are paid at or above award rates; and
  - As set out in Section 5 of this statement, Revlon Australia has appropriate policies and procedures in place to protect its employees and conduct due diligence on third parties.
- Third party raw materials, chemicals and packaging components: As stated above, approximately 5% of the finished goods Revlon Australia sold in Australia and New Zealand over the Reporting Period were sourced from Korea, China, and Japan. 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 in Section 5, Revlon Australia has processes in place to mitigate the risks of modern slavery practices in its direct supply chain. However, there remains some risk that Revlon Australia could be linked to modern slavery practices through its indirect supply chain.
- Third party manufacturing facilities: Revlon Australia has less oversight over third party facilities than it does over Revlon-owned and operated facilities that make up 95% of its supply chain. As such, there is some risk that the third party manufacturer used in Australia could have modern slavery practices through its direct or indirect supply chain. However, this manufacturer is aware of this risk and has submitted its own Modern Slavery Act statement describing its efforts to

mitigate this risk. The applicable policies and procedures which Revlon Australia has in place to further manage this risk are described in Section 5.

- **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 Australia's third parties in these industries could create modern slavery risks. As set out in Section 5, Revlon Australia has processes in place to mitigate modern slavery risks.
- **Indirect services:** Indirect services, including utility providers, machine and equipment maintenance, office security, and cleaning services, may be associated with higher modern slavery risks due to the use of low wage labour in these industries. As set out in Section 5, Revlon Australia has processes in place to mitigate modern slavery risks.
- **Budget limitations, high demand for our product, and tight delivery timeframes:** These factors may impose time and cost pressures on Revlon Australia's supply chain, which also may contribute to modern slavery risks. As set out in Section 5, Revlon Australia has processes in place to mitigate such risks.

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## 5 Actions Taken by Revlon Australia to Assess and Address Modern Slavery Risks

Revlon Australia is committed to complying with laws, establishing policies, delivering training and taking other necessary actions to help eliminate modern slavery in its operations and supply chains.

Key actions taken by Revlon Australia to assess and address modern slavery risks over the Reporting Period include:

- Hiring an external training provider to customize and deliver modern slavery awareness training to key personnel across Revlon Australia.
- Improving our global Third Party Code of Conduct ("**Third Party Code**") to include additional requirements related to human rights, labour and employment rights.
- Enhancing our Compliance help line ("Help Line") and webform ("Webform") for formal grievances and whistle-blower reporting, as detailed in the "Speaking Up" section below, including but not limited to adding a direct, toll-free line to make it easier for employees and third parties in Australia to reach Revlon Compliance.
- Conducted a global town hall training on Revlon's employee Code of Conduct and Business Ethics, for all employees including Revlon Australia employees, where employees could ask questions live and receive answers to their questions.

Further details are provided below.

### Revlon Australia's Policies

**Employees:** Revlon Australia continued to implement Revlon's employee Code of Conduct and Business Ethics ("**Code of Conduct**") during this Reporting Period. The Code of Conduct governs the principles, standards and expectations that guide Revlon Australia'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. During the Reporting Period, Revlon Australia employees were trained on Revlon's Code of Conduct, as described above.

During the Reporting Period, Revlon Australia continued to implement and train new employees on its **Equal Employment Harassment Discrimination Policy**, which highlights Revlon Australia's commitment to providing a work environment in which everyone is treated with dignity, courtesy, and respect.

**Third Parties:** Revlon Australia requires its third party partners to comply with Revlon's Third Party Code. The Third Party Code was updated during this Reporting Period. It now includes additional requirements related to human rights and labour and employment, such as upholding international labour standards. The Third Party Code requires our partners to comply with all applicable laws safeguarding workers, treating them with respect and dignity, so they are not subjected to any physical, verbal, psychological or sexual abuse or misconduct.

The updated Third Party Code 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 updated 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. Generally, Revlon's due diligence processes include risk assessments, which may include completion of a due diligence questionnaire and background check.

Finally, 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 Help Line, Webform or by email so that Revlon can take any necessary action. Callers can make anonymous reports through the Help Line. Revlon Australia 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 Australia or in connection with Revlon Australia's business. Any material failure to comply with Revlon's Third Party Code may result in the termination of Revlon Australia's relationship with the supplier.

## **Training**

During the Reporting Period, Revlon Australia focused on increasing employee awareness and engagement regarding modern slavery risks. Revlon Australia engaged with an external training provider to customize and deliver modern slavery awareness training to key personnel across the organisation, including leadership, human resources, supply chain, procurement, creative services, and warehousing. The training focused on defining modern slavery, relevant legislative requirements, and identifying threats and opportunities for Revlon Australia to mitigate modern slavery risks. Going forward, Revlon Australia expects that Modern Slavery Awareness Training will be held bi-annually.

In addition, Revlon and its affiliates, including Revlon Australia, also provide a range of internal training courses for employees around ethical behaviour. Over the Reporting Period, Revlon conducted a town hall training for its employees globally on the employee Code of Conduct. Revlon Australia also trains new employees on its Equal Employment Harassment Discrimination Policy, as described above.

In addition to global training, Revlon Australia provides technical and soft skill training each year to its employees. Revlon Australia continued to provide its employees with access to an Employee Assistance Program ("EAP") service, through which employees could access wellbeing webinars covering topics such as inclusion and diversity, coaching skills in the workplace, exercising self-care, and building resilience and respectful relationships. This training assists in mitigating modern slavery risks in Revlon Australia's operations by ensuring that its employees are aware of their rights at work.

In future reporting periods, Revlon Australia will continue to partner with its parent company to address global training and education needs on modern slavery on an ongoing basis.

## Speaking Up

Revlon continues to maintain 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.

During the Reporting Period, twelve (12) new toll-free Help Line phone numbers – including a direct Australia phone number – an updated Web Form and a QR code for the Webform were added, so that individuals from various countries, including from Australia, can more easily and directly call into the Help Line or submit a concern using the Webform. 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.

## Contracting with Third Parties

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

**New Contracts.** During the Reporting Period, Revlon Australia contracted with fourteen (14) new third party providers, including graphic design services, marketing, packaging and real estate, following the processes outlined below.

When looking for a new supplier, Revlon Australia 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, when a third party is selected, Revlon Australia 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. 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 a contract with a third party is executed, Revlon Australia typically conducts detailed onboarding and integration planning, which includes detailed documents outlining health and safety and security practices, along with other business processes and requirements.

**Existing Contracts.** During the Reporting Period, Revlon Australia reviewed its third party manufacturer's raw materials and manufacturing processes and its statement under the *Modern Slavery Act 2018* (Cth) to assess risk. In that statement, the third party manufacturer commits to reduce the risk of all forms of modern slavery arising in its supply chain. In addition, the third party manufacturer is under a continued contractual obligation to comply with Revlon's Third Party Code.

During the Reporting Period, Revlon Australia renegotiated payment terms with four (4) existing suppliers. As part of this process, Revlon Australia validated each supplier's operational capability, component sourcing and quality control mechanisms, which helps to mitigate potential risks, including potential modern slavery risks with these suppliers.

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

## Continuous Improvement

As part of Revlon Australia's commitment to manage modern slavery risks, Revlon is committed to reviewing 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.

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## 6 Assessment of Effectiveness

Assessing the effectiveness of Revlon Australia's modern slavery risk management involves a cross-functional partnership, 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 Australia provided updated training for employees to increase their awareness and empower them to identify and combat modern slavery risks. Revlon also continued to monitor its Help Line and Web Form cases to identify, investigate and remediate any modern slavery concerns.

Revlon will continue to enhance its policies and training, as well as its third party risk management program in future reporting periods.

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## 7 Approval and signatures

This statement was approved on June 26, 2023 by the board of directors of Revlon Australia, being the principal governing body of Revlon Australia as defined in the *Modern Slavery Act 2018* (Cth).

Signed:



Antonio Turri, Director

Date: June 26, 2023

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## 8 Disclaimer

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