

Revlon Australia's Modern Slavery Act Statement 2023

I. 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 2023 ("**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 the last reporting period. During this Reporting Period, Revlon Australia's ultimate parent company successfully restructured and emerged from its Chapter 11 filing in May 2023. During this Reporting Period, Revlon Australia focused on maintaining its current operations and supply chain base to manage any potential business disruption while emerging from the Chapter 11 filing.

II. 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.

III. Revlon Australia's Structure, Operations and Supply Chains

Legal structure and operations

Revlon Australia is an indirect subsidiary of Revlon Group Holdings LLC ("**Revlon**") 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 other entities.

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. During the Reporting Period, Revlon Australia continued to work 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. Consistent with the 2022 reporting period, approximately 95% of the finished products that Revlon Australia sold in Australia and New Zealand over this 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. Consistent with the 2022 reporting period, 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. During the Reporting Period, Revlon Australia continued to work with one third party manufacturer in Australia to manufacture one makeup product.

As of the date of this Statement, Revlon Australia employs 191 permanent employees (82% full time and 18% 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 3% of the workforce (the majority for maternity leave covers) 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 continues to partner on-site with a third party co-packer to prepare product for local distribution.

During the Reporting Period, Revlon Australia continued 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 Revlon products to cancer patients and through employees' fundraising efforts.

Revlon Australia's supply chains

Consistent with the 2022 reporting period, 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.

IV. Risks of Modern Slavery

Revlon Australia's risk profile during the Reporting Period has remained consistent with the 2022 reporting period, as Revlon Australia's structure, operations, sourcing strategy and supply chain have not changed from the 2022 reporting period to this Reporting Period. Therefore, the potential modern slavery risks that Revlon Australia identified during the 2022 reporting period, which are listed below, are also relevant for this Reporting Period. However, Revlon Australia continues to implement 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 (usually for maternity leave covers) may lack certain protections and be vulnerable to modern slavery. Agencies may also charge workers recruitment fees. However, these contracted employees are entitled to the same benefits, worker protections, and policies as permanent Revlon Australia employees.
- 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 V, 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 V.
- 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 V, 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 V, 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 V, Revlon Australia has processes in place to mitigate such risks.

V. **Actions Taken by Revlon and 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.

During the Reporting Period, some key actions taken by Revlon – that apply to Revlon Australia – to assess and address modern slavery risk included:

- Conducting mandatory training on Revlon's employee Code of Conduct and Business Ethics ("**Code of Conduct**"), for all employees including Revlon Australia employees, which included training on modern slavery, forced labour and human rights;
- Onboarding and implementing a new vendor due diligence screening tool for conducting background checks on third parties, which includes human rights, forced labour and child labour;
- Developing a centralized, risk-based third party risk management program, including a governance structure and guidance for assessing third party risk across relationship types and risk disciplines, and for conducting and interpreting due diligence; and
- Conducting a third party audit of one of Revlon's suppliers in China that provides component parts for cosmetics, which did not identify any child or forced labour activity.

Further details are provided below.

Revlon Australia's Policies

Employees: Revlon Australia continued to implement Revlon's Code of Conduct during the 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. 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 Australia continued to implement and train 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 continues to require its third party partners to comply with Revlon's Third Party Code. The Third Party Code includes 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 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 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.

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 prior reporting period, Revlon Australia engaged 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 during the 2022 reporting period focused on defining modern slavery, relevant legislative requirements, and identifying threats and opportunities for Revlon Australia to mitigate modern slavery risks. As Revlon Australia plans to hold this Modern Slavery Awareness Training once every two years, the next training will be held during the next reporting period.

During the Reporting Period, Revlon Australia continued to provide a range of internal training courses for employees around ethical behaviour. Revlon Australia employees were required to take Revlon's Code of Conduct training, which includes a segment on modern slavery. In addition, Revlon Australia also trained its employees on its Equal Employment Harassment Discrimination Policy, as described above.

During the Reporting Period, Revlon Australia continued to provide technical and soft skill training to its employees, including by providing its employees with access to an Employee Assistance Program ("EAP") service, through which employees can 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.

Speaking Up

Revlon Australia continues to maintain a Help Line and Web Form for formal grievances and whistleblower reporting that enables employees and other stakeholders, including third parties, to raise issues of suspected human rights and other violations. Revlon Australia 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. Revlon Australia employees can also raise concerns or allegations of misconduct to a supervisor, Human Resources or the legal department. Revlon's Help Line – which has a direct phone number from Australia – 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 Australia employees can access the Web Form using either a link on Revlon's internal intranet page or by scanning a QR code.

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 and Conducting Due Diligence

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 five new third party providers, including media, installations, product development and public relations. 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 onboarding and integration planning, which may include discussions and documents outlining health, safety and security practices, along with other business processes and requirements.

Due Diligence. Generally, Revlon's due diligence processes include risk assessments, which may include completion of a due diligence questionnaire and/or a background check.

During the Reporting Period, Revlon onboarded a new vendor due diligence screening tool for conducting background checks on third parties, which includes human rights, forced labour and child labour. Revlon is also developing a centralized, risk-based third party risk management program, including a governance structure and guidance for assessing third party risk across relationship types and risk disciplines, and for conducting and interpreting due diligence.

The new screening tool and the risk management program will continue to improve Revlon Australia's ability to conduct due diligence on and monitor third parties based upon risk to the organization.

Existing Contracts. During the lifecycle of a third party contract, Revlon Australia periodically reviews its vendor relationships, considering safety, service, and review of key performance indicators. In addition, the Third Party Code provides Revlon and its subsidiaries, including Revlon Australia, with the right to conduct periodic audits and/or require proof of recent audits conducted on its third parties. For example, during the Reporting Period, Revlon contracted with a reputable third party auditing firm to conduct a social and operational audit of one of Revlon's suppliers in China that supplies component parts for cosmetics, which are incorporated into Revlon's finished products. The audit did not identify any child or forced labour activity.

Revlon Australia's third party manufacturer in Australia continues to be contractually obligated to comply with Revlon's Third Party Code and commits in its annual statement under the *Modern Slavery Act 2018* (Cth) to assess and reduce the risk of all forms of modern slavery arising in its supply chain.

Continuous Improvement

Revlon Australia will continue to review its policies, practices, training and third party risk management program. Revlon Australia will also continue to evaluate ways to enhance its responsible and ethical sourcing practices. Revlon Australia is committed to acting with integrity and complying with all applicable laws and regulations, and requiring its third parties to do the same.

VI. Assessment of Effectiveness

Revlon and Revlon Australia's assessment of 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 continued to monitor its Help Line and Web Form cases, including any cases from Australia, to identify, investigate and remediate any modern slavery concerns. If concerns from Revlon Australia are reported, Revlon Compliance works with the Revlon Australia team to investigate and mitigate any such concerns.

VII. Consultation

Revlon Australia does not own or control any other entities and therefore this criterion is not applicable.

VIII. Approval and Signatures

This statement was approved on 27 June, 2024 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: 27 June, 2024

IX. Disclaimer

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