

## Revlon Australia's Modern Slavery Act Statement 2024

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### 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 2024 ("**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.

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### II. Revlon Australia's Commitment

Revlon Australia is committed to respecting 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 seek to improve our understanding of modern slavery risks in our operations and supply chain and take effective measures to mitigate these risks.

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

#### Legal structure and operations

Revlon Australia is an indirect subsidiary of Revlon Consumer Products LLC ("**Revlon LLC**") 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.

As of the date of this Statement, Revlon Australia employs 178 permanent employees (79% full time and 21% 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 4% of the workforce (the majority for parental 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 products for local distribution.

## Revlon Australia's supply chains

Approximately 90% 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. The products sold in Australia and New Zealand were colour cosmetics, skin care, hair care and fragrances. Revlon LLC has visibility into all of its Tier 2 suppliers of raw materials and component parts used in its factories, including plastics and glass components, fragrances, ingredients and corrugate. The majority of these suppliers are located in the U.S., Spain, Germany, Italy, China and France.

Approximately 10% of the finished goods Revlon Australia sold in Australia and New Zealand over the Reporting Period were sourced from third party manufacturers in China, Hong Kong and Korea. Those third-party manufacturers produce mainly colour cosmetics for Revlon Australia and source materials for those products from China and Southeast Asia.

During the Reporting Period, Revlon Australia continued to work with one third party manufacturer in Australia to manufacture two makeup products.

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

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## IV. Risks of Modern Slavery

Revlon Australia's risk profile during the Reporting Period has remained consistent with the 2023 reporting period, as Revlon Australia's structure, operations, sourcing strategy and supply chain have not materially changed from the 2023 reporting period to this Reporting Period. Therefore, the potential modern slavery risks that Revlon Australia identified during the 2023 reporting period, which are listed below, are also relevant for this Reporting Period. Revlon Australia continues to implement controls to manage these risks.

- Sourcing from countries with elevated corruption and modern slavery risk: Our assessment of supply chain risk during the Reporting Period involved in part a risk ranking of vendors by location (informed by Transparency International's Corruption Perceptions Index) and vendor type, to undertake background checks of current suppliers. We used the Corruption Perceptions Index to understand the broader risk, as we acknowledge there is a nexus between bribery/corruption risk and supply chain risk.

In addition, in preparing this Statement, we considered the Global Slavery Index ("GSI") to understand modern slavery risks in our supply chains. According to the GSI, countries such as China and Korea present elevated modern slavery risks in certain manufacturing supply chains. Approximately 10% of Revlon Australia's finished goods sold in Australia and New Zealand were sourced from third-party manufacturers in China, Hong Kong, and Korea during the Reporting Period. We acknowledge that these supply chains may present certain exposure to modern slavery risk that could warrant enhanced supplier oversight.

- 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: 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.
- 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, we acknowledge that there is some risk that the third party manufacturer used in Australia could have modern slavery practices through its direct or indirect supply chain.
- 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.
- 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.
- 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.

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## V. **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.

### **Policies**

**Employees**: Revlon Australia continued to implement Revlon LLC'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 LLC has an Anti-Harassment / Anti-Discrimination Policy, which highlights Revlon LLC'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.

During the Reporting Period, Revlon LLC formalized its whistleblower and Speak Up program into an internal Whistleblower Policy that establishes guidelines for reporting and investigating concerns and affirms a strict prohibition against any form of retaliation. This Whistleblower Policy applies to Revlon Australia.

**Third Parties:** Revlon Australia continues to require its third party partners to comply with Revlon LLC'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.

It states that Revlon LLC 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, web form or by email so that necessary action can be undertaken. Callers can make anonymous reports through the help line or web form. 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 our relationship with the supplier.

## Training

During the Reporting Period, Revlon Australia:

- Delivered modern slavery awareness training to key personnel across the organisation, including leadership, human resources, supply chain, procurement, creative services, and warehousing. This training focused on defining modern slavery, relevant legislative requirements, and identifying threats and opportunities for Revlon Australia to mitigate modern slavery risks.
- Required its employees to take Revlon's Code of Conduct training, which includes a segment on modern slavery.
- Trained its employees on its Equal Employment Harassment Discrimination Policy.
- Provided technical and soft skill training to its employees, including by providing its employees with access to an Employee Assistance Program 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.

During the Reporting Period, Revlon LLC contracted with a new training vendor to expand its global training content, including for Code of Conduct training and training on other topics, such as forced labour and modern slavery. In addition, Revlon LLC engaged an independent third party expert 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 mandatory training was rolled out in 2025 to key employees with responsibilities in managing and overseeing Revlon LLC's procurement and supply chain (including employees of Revlon Australia).

In future reporting periods, Revlon Australia will continue to partner with its parent company to address global training and education needs.

## **Speak Up Program**

Revlon Australia has processes for incident reporting, including a formal grievance and whistleblower reporting mechanism that allows employees and other stakeholders, including third parties, to raise ethics concerns. Individuals can submit reports through our help line (with an Australia specific phone number) or web form, which are available 24/7. Reporters can request to speak in various languages and can make reports anonymously. All reports are confidentially investigated and retaliation is prohibited.

Employees and third parties are encouraged to raise questions or concerns, including potential violations of the Code of Conduct, Third Party Code, or applicable law. In addition to using the help line or web form, employees of Revlon Australia can also report concerns or allegations of misconduct to a supervisor, human resources, compliance or the legal department.

## **Conducting Due Diligence and 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.

When looking for a new supplier, Revlon Australia typically engages in a competitive request for proposal 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. The supplier will undergo due diligence based on risk, including the completion of a due diligence questionnaire and a background check. The background check covers adverse media screening, regulatory and legal risk indicators, and assigns confidence levels to potential matches based on publicly available information. It identifies financial, compliance, and reputational risks—such as litigation, fraud, corruption, sanctions violations, and modern slavery or human rights concerns—associated with individuals or entities, and flags them for adjudication. Once a supplier is approved, it undergoes monitoring and any flags are adjudicated and escalated as necessary.

If the supplier passes due diligence, Revlon Australia will enter into a contract with the supplier, requiring the supplier 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.

During the Reporting Period, Revlon Australia contracted with five new third party providers, including for media, installations, product development and public relations services.

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.

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 LLC 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. Revlon LLC intends to conduct third-party audits in the next reporting period, guided by a risk analysis and the strategic allocation of audit resources, as detailed below.

During the Reporting Period, Revlon LLC engaged a consultant to evaluate its third-party population to ensure that Revlon LLC has an accurate picture of its third-party risks, including modern slavery. As part of this review, Revlon LLC established a risk rating methodology that measured risks based on several key variables, such as vendor category and geography (as determined by Transparency International's Corruption Perception Index). Based on this analysis and consistent with risk management best practices, Revlon LLC focused resources on those third parties that presented elevated risks.

## **Continuous Improvement**

As part of our commitment to manage modern slavery risks, Revlon LLC's affiliates regularly review relevant policies, practices and training and evaluate options to enhance our responsible and ethical sourcing practices and third party risk management.

During the next reporting period, Revlon LLC intends to audit selected higher-risk suppliers against our Third Party Code of Conduct, which we expect will include identifying modern slavery risks within their operations and supply chains and identifying appropriate controls to mitigate any such risks.

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## **VI. Assessment of Effectiveness**

We evaluate the effectiveness of our efforts to combat modern slavery by:

- reviewing our policies, practices, and training, as well as addressing any relevant issues or risks that arise on a periodic basis.
- continuously assessing risk by reviewing our processes for identifying, contracting, onboarding, and monitoring third parties
- regularly monitoring our Help Line and Web Form to identify, investigate, and address any potential modern slavery concerns.

To this end, during the Reporting Period, Revlon LLC further engaged independent compliance and third-party risk management experts to assist with reviewing the effectiveness and improving Revlon's various controls surrounding modern slavery risks. As part of this effort, and as previously mentioned, Revlon LLC is enhancing its global 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 in their operations and supply chains. This effort includes ongoing assessments of industry best practices and advanced risk management tools. Further, Revlon leverages its membership in Accord Australasia to stay aligned with evolving industry standards, participate in collaborative initiatives, and access shared resources that support

enhanced due diligence, ethical labour and sourcing practices, and the creation of a socially responsible supply chain.

We will also continue to train on modern slavery, forced labour and human trafficking.

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## VII. Consultation

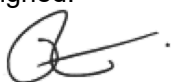
Revlon Australia does not own or control any other entities and therefore this criterion is not applicable.

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## VIII. Approval and Signatures

This statement was approved on June 26, 2025 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, 2025

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## IX. Disclaimer

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

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## X. Annexure

The table below indicates the page number/s of the Statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	1-2
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	2-3
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	3-6
e) Describe how the reporting entity assesses the effectiveness of these actions.	6-7
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by	Do not own or control any other entities

the statement).	
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	1