

Revlon Modern Slavery Act Statement 2020, 2021

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”). 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 2020; and
- the twelve months ending 31 December 2021.

Revlon Australia is a reporting entity for the purposes of the Act as it is an Australian company with a consolidated revenue of over \$A100 million during each of the reporting periods.

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 are committed to improving our understanding of modern slavery risks in our operations and supply chain and taking effective measures to mitigate these risks.

3 Revlon Australia’s Structure, Operations and Supply Chains

Legal structure and operations

Revlon Australia is an indirect subsidiary of Revlon, Inc. (“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 subsidiaries. Revlon Australia sells Revlon and Elizabeth Arden products direct to retailers through various channels such as pharmacy, discount department stores, grocery and department stores. Revlon Australia sells Revlon Professional products to independent salons and mass outlet chains. In addition, Revlon Australia contracts 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 sells in Australia and New Zealand are imported from Revlon owned and operated factories 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 Australia also contracts with one local third-party manufacturer to manufacture certain makeup products. In 2020, the third party manufactured two products. In 2021, Revlon discontinued manufacturing one product through this third-party manufacturer. As a result, this third party manufactured one product in 2021.

As of the date of this Statement, Revlon Australia employs 190 permanent employees (75% full time and 24% part time). These employees are based in the Sydney and Canberra offices, the Distribution Centre, interstate field locations, and retail stores (for in store promotional activity). Only 1% of the workforce (usually part-time merchandisers) 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.

In addition, Revlon Australia supported various charitable organizations, including Look Good Feel Better (LGFB), which is part of the Cancer Patients Foundation, by donating products to cancer patients in 2020

and 2021. Revlon Australia also donated to the Australian Red Cross Disaster Relief & Recovery Fund to assist with the Australian Bushfire Crisis in 2020.

Revlon Australia's supply chains

As mentioned above, Revlon Australia currently sources only one item out of the approximately 2800 total items in its portfolio from a local third-party manufacturer and imports approximately 95% of the remaining portfolio items from Revlon owned and operated factories in the United States, Spain, South Africa and Italy.

Revlon Australia also partners 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.

4 Risks of Modern Slavery

Revlon Australia has conducted a high-level analysis of modern slavery risks in its operations and supply chains during the 2020 and 2021 reporting periods. Revlon Australia recognizes that risks of modern slavery may exist in the following areas:

- 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 is mitigated by the following:
 - The employees are engaged in Australia, which has 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: Modern slavery risks may be associated with the 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 these 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;
- 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; and
- 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.

In future reporting periods, Revlon Australia will evaluate industry best practices to refresh and improve risk mapping in its operations and supply chains.

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 any other necessary action to help eliminate modern slavery.

Revlon Policies and Training

Policies

Employees: Revlon's 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 are expected to read, understand and certify the Code of Conduct once 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.

Third Parties: Revlon requires its 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. 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 hotline or by email so that Revlon can take any necessary action. Callers can make anonymous reports through the hotline. Revlon 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 all of their employees and subcontractors who will work with Revlon or in connection with Revlon's business. Any material failure to comply with our Third Party Code may ultimately result in the termination of Revlon's relationship with the supplier.

Training

Revlon and its affiliates, including Revlon Australia, provide a range of internal training courses for employees around ethical behaviour. On an annual basis, Revlon conducts a training and certification for its employees globally on the Code of Conduct. Revlon also conducts an annual training globally on its Anti-Harassment / Anti-Discrimination Policy to promote dignity and respect in the workplace.

In addition to global training, Revlon Australia provides technical and soft skill training each year to its employees. On a bi-annual basis, Revlon Australia holds a mandatory training for office-based employees on bullying and harassment, which is led by an external provider covering topics such as anti-discrimination and employee rights. Revlon Australia also provides 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, 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 evaluate industry best practices to continue to drive awareness and education of modern slavery among its employees.

Speaking Up

Revlon has a formal grievance and whistle-blower reporting mechanism 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 Compliance hotline is available to employees, other stakeholders and third parties 24/7 and in many languages and reports can be made 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.

Contracting with Third Parties

Revlon Australia has established business practices to retain and maintain ethical third-party relationships in order to conduct business with organizations that respect human rights and are fair to their employees. The local procurement team validates potential providers, including assessing their operational capability, industry reputation and economic stability, which helps to identify potential modern slavery and other risks. Revlon Australia typically engages in a competitive request for proposal (RFP) process, whereby third parties are selected based on a scorecard approach ensuring compliance with our standards, pricing, account management structure and other value adds. Revlon's Third Party Code gives Revlon the ability to require third parties to complete a due diligence or self-assessment questionnaire; cooperate with an on-site audit; or provide proof of recent audits conducted. As such, Revlon Australia may conduct site visits to new vendor manufacturing locations to assess compliance with local laws before choosing a vendor or during the life cycle of the business relationship with the vendor.

Once the 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. Generally, 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. Revlon Australia's contract with its local third-party manufacturer includes compliance with Revlon's Third Party Code. The manufacturer has also submitted a statement under the Modern Slavery Act in which it commits to reduce the risk of all forms of modern slavery arising in its supply chain.

After the contract is executed, Revlon Australia conducts detailed onboarding and integration planning, which includes detailed documents outlining health and safety and security practices, along with other business processes and requirements.

During the lifecycle of the third-party contract, Revlon Australia regularly conducts business reviews which consider safety, service, review of key performance indicators, and confirms that suppliers are operating under lawful conditions. For Revlon Australia's local third-party manufacturer, Revlon Australia regularly reviews the raw materials and manufacturing process.

Continuous Improvement

Revlon and its affiliates, including Revlon Australia, are committed to continuously reviewing policies and practices to actively address risks to people in our business, including modern slavery. We are in the process of enhancing our responsible and ethical sourcing practices, updating relevant policies and procedures, refreshing supply chain risk mapping, and revising third party due diligence and monitoring practices.

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 our third parties to do the same.

6 Assessment of Effectiveness

We measure the effectiveness of our efforts to combat modern slavery by continuously assessing the policies and practices we have in place and identifying areas of improvement. This assessment will include our established processes to identify, contract, onboard and monitor our third parties, who must commit to our ethical principles and raise concerns to the Company. As part of this process, we regularly monitor our Compliance hotline to identify, investigate and remediate any modern slavery concerns.

We will continue to partner with our third parties to improve awareness of and mitigate modern slavery risks in their operations and supply chains. This includes ongoing assessment of industry best practices

and cutting-edge risk management tools, as well as collaborating with our suppliers to design traceability approaches and map material sources to reduce modern slavery risk. In addition, Revlon Australia will explore adding modern slavery discussions to its periodic business reviews with vendors as part of its efforts to expand supply chain risk mapping, and adding a modern slavery training element to its employee training program.

7 Approval and signatures

This statement was approved on 27th June 2022 by the board of directors of Revlon Australia, being the principal governing body of Revlon Australia as defined in the Modern Slavery Act.

Signed:



Antonio Turri, Director

Date: 28th June 2022

8 Disclaimer

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