



## **Elizabeth Arden (U.K.), Ltd.**

### **UK Modern Slavery Act Statement**

#### **Purpose of Statement**

This Modern Slavery Statement (“Statement”) is made by Elizabeth Arden (U.K.), Ltd. (“Elizabeth Arden UK”), which is a United Kingdom limited company and indirect subsidiary of Revlon Consumer Products LLC (“Revlon”). This Statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes Elizabeth Arden UK’s modern slavery and human trafficking statement for the year from 1 January 2022 to 31 December 2022 (the “Reporting Period”).

#### **Elizabeth Arden UK’s Commitment**

Elizabeth Arden UK is committed to the protection of human rights and the prevention of slavery and human trafficking throughout our organisation and supply chains through responsible supply chain management and ethical manufacturing practices. We uphold international labour laws and require the same of our third-party partners. 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 Elizabeth Arden UK, 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.

#### **Elizabeth Arden UK’s Structure, Operations and Supply Chains**

Elizabeth Arden UK markets, distributes and sells fragrances, skin care and cosmetics in the United Kingdom under the Elizabeth Arden, Britney Spears, Christina Aguilera and Juicy Couture brands. These products are sold to wholesalers and direct to retailers through various channels such as pharmacy, discount stores, grocery, department stores and travel retail. In addition, Elizabeth Arden UK contracts with local distributors and online retailers to sell certain products in the UK.

Elizabeth Arden UK has an office in London and a distribution centre in Stone (the “Distribution Centre”), where finished goods imported from overseas are prepared for distribution. One hundred percent (100%) of the finished products that Elizabeth Arden UK sells in the UK are imported from Revlon owned and operated manufacturing facilities 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. Elizabeth Arden UK does not contract with any local third-party manufacturers for finished products sold in the UK.

Elizabeth Arden UK also partners with many local suppliers to conduct its business. This includes office space rental, office security, facilities services, utility providers, machine and equipment maintenance, cleaning services, packaging, information technology services, transportation of goods, digital merchandising consultants, visual merchandising products, and marketing and regulatory consultants.

As of the date of this Statement, Elizabeth Arden UK employs approximately 197 employees. These employees are based in the London office, Distribution Centre, nation-wide field locations, retail stores, and airports. A small percentage of the workforce is engaged under a short-term contract and is engaged directly by Elizabeth Arden UK.

### **Risks of Modern Slavery**

Elizabeth Arden UK 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: Elizabeth Arden UK understands that workers employed on a short-term basis may lack certain protections and may be vulnerable to modern slavery;
- 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. As set out below, Elizabeth Arden UK has processes in place to mitigate the risks of modern slavery and human trafficking practices in its direct supply chain. However, there remains some modern slavery risk from indirect suppliers retained by third parties who contract with Elizabeth Arden UK;
- 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 Elizabeth Arden UK's third parties in these industries could create modern slavery and human trafficking risks;
- Indirect services: Indirect services, including utility providers, machine and equipment maintenance, office security and facilities services, and cleaning services, may be associated with modern slavery and human trafficking risks due to the use of low wage labour; and
- Budget limitations, high demand for our product, and tight delivery timeframes: These factors may impose time and cost pressures on Elizabeth Arden UK's supply chain, which also may contribute to modern slavery and human trafficking risks.

### **Actions Taken by Elizabeth Arden UK to Assess and Address Modern Slavery and Human Trafficking Risks**

Elizabeth Arden UK is committed to complying with laws, establishing policies, delivering training and taking any other necessary action to help eliminate modern slavery and human trafficking.

#### **Revlon Policies and Training for Employees**

##### Policies

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, including employees of Elizabeth Arden UK, 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.

### Training

Revlon and its affiliates, including Elizabeth Arden UK, provide a range of internal training courses for employees around ethical behaviour. On an annual basis, Revlon conducts mandatory global employee training on and requires employees to certify to its Code of Conduct.

## **Revlon Policies and Processes for Third Parties**

### Policies

Elizabeth Arden UK has zero tolerance for slavery and human trafficking. Elizabeth Arden UK 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.

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 updated Third Party Code provides that Elizabeth Arden UK will only conduct business with organizations that respect human rights and are fair to their employees, and that Revlon and Elizabeth Arden UK prohibit 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 by the third party 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 so that Revlon and/or Elizabeth Arden UK can take any necessary action. Elizabeth Arden UK 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 Elizabeth Arden UK or in connection with Elizabeth Arden UK's business. Any material failure to comply with the Third Party Code may ultimately result in the termination of Elizabeth Arden UK's relationship.

### Contracting Process

Elizabeth Arden UK has established business practices to retain and maintain ethical third-party relationships in order to conduct business with organizations that respect human rights, comply with their legal obligations and treat employees fairly. The local procurement team validates potential providers, including assessing their operational capability, industry reputation and economic stability, which helps to identify potential modern slavery, human trafficking and other risks. Elizabeth Arden UK typically engages in a competitive request for proposal (RFP) process, whereby third parties are selected based on 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, Elizabeth Arden UK may conduct financial audits or on-site audits and site visits to new vendor manufacturing locations to assess compliance with local laws before choosing a vendor as well as during the lifecycle of the business relationship with the vendor.

Once the third party is selected, Elizabeth Arden UK 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.

After the contract is executed, Elizabeth Arden UK conducts onboarding and integration planning, which includes detailed documents outlining quality expectations, health and safety and security practices, along with other business processes and requirements.

During the lifecycle of the third-party contract, Elizabeth Arden UK regularly conducts business reviews which consider quality, safety, service, review of key performance indicators, and confirming that suppliers are operating under lawful conditions, including those relating to slavery and human trafficking.

## Speaking Up

Elizabeth Arden UK 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, including modern slavery and human trafficking concerns. 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.

During the Reporting Period, Revlon enhanced its Compliance help line (“Help Line”) by adding a direct, toll-free line and updated its Compliance webform (“Webform”), which can now be accessed by scanning a QR Code, to make it easier for employees and third parties in the UK to reach Revlon Compliance.

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.

## Continuous Improvement

As part of Elizabeth Arden UK’s commitment to manage modern slavery risks, Revlon and its affiliates, including Elizabeth Arden UK, are committed to reviewing relevant 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 our third parties to do the same.

## Assessment of Effectiveness

We measure the effectiveness of our efforts to combat modern slavery by continuously assessing the policies, practices and training we have in place. 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 Revlon and/or Elizabeth Arden UK. As part of this process, we regularly monitor our Help Line and Webform 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 and human trafficking 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, Elizabeth Arden UK will explore ways to further enhance employee awareness regarding modern slavery and human trafficking, which may include adding a training element to its existing employee training program, as described above.

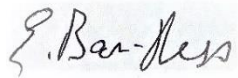
This statement has been approved by the board of directors of Elizabeth Arden (U.K.), Ltd.

Signed on behalf of Elizabeth Arden (U.K.), Ltd.



Seth Fier, Director

Date: 30 June 2023



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Director

Date: 30 June 2023