

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 Corporation ("Revlon"). This Statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes Elizabeth Arden UK's slavery and human trafficking statement for the year from 1 January 2021 to 31 December 2021.

Elizabeth Arden UK's Commitment

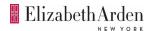
Elizabeth Arden UK is committed to the protection of human rights and the prevention of slavery and human trafficking throughout our organisation and supply chains through responsible supply chain management and ethical manufacturing practices. We uphold international labour laws and require the same 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 brand. 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 159 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.

Risks of Modern Slavery

Elizabeth Arden UK has conducted a high-level analysis of modern slavery and human trafficking risks in its operations and supply chains during the 2021 reporting period. Elizabeth Arden UK recognizes that risks of modern slavery may exist in the following areas:

- 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;
- <u>Indirect services:</u> 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
- <u>Budget limitations, high demand for our product, and tight delivery timeframes</u>: 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.

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

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.

Revion 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, 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.

Third Parties: Elizabeth Arden UK has zero tolerance to slavery and human trafficking. To ensure those in our supply chain and other third parties comply with our values and ethics, 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. 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 Elizabeth Arden UK can take any necessary action. Callers can make anonymous reports through the hotline. 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 all of 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 our Third Party Code may ultimately result in the termination of Elizabeth Arden UK's relationship with the supplier.

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 global employee training on and requires employees to certify to its Code of Conduct and Business Ethics. Revlon also conducts an annual employee training program globally on its Anti-Harassment / Anti-Discrimination Policy to promote dignity and respect in the workplace.

In future reporting periods, Elizabeth Arden UK will evaluate industry best practices to continue to drive awareness and education of modern slavery among its employees.

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. 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. Revion 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

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 of Conduct 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.

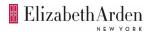
After the contract is executed, Elizabeth Arden UK conducts onboarding and integration planning, which includes detailed documents outlining quality expectations, health and safety and security practices, along with other business processes and requirements.

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.

Continuous Improvement

Revlon and its affiliates, including Elizabeth Arden UK, are committed to continuously reviewing policies and practices to actively address risks to people in our business and supply chains, including the risk of modern slavery and human trafficking. 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.



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 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 adding a specific modern slavery and human trafficking training element to its employee training program, in addition to its existing training program, as described above.

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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.

Victoria Dolan

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Director and Chief Financial Officer

Date: 6/29/2022

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Director and Chief Human Resources Officer

Date: 6/29/22