

# REVLON

## THIRD PARTY CODE OF CONDUCT

*Revlon has built iconic brands and established its reputation as a pioneer and trendsetter in the beauty industry. The success of our company is a direct result of our values and the demonstration of integrity in everything we do.*

*We are a company that believes how we conduct business matters as much as the results we achieve.*

*Our global growth is built on the trust that consumers place in our brands, our high-quality products, the partnerships we have with suppliers, commercial partners and other third parties, and our respect for the communities where we operate. Above all, we aim to grow our business sustainably and responsibly.*

*Revlon, and all of the brands under its beauty portfolio, are committed to full compliance with ethical business practices and all applicable laws and we expect the same commitment from our vendors and suppliers of goods and services, as well as our customers and commercial partners, licensees, third party manufacturers, agents and other representatives, consultants, and other third parties (collectively, “**Third Party Partners**”).*

*We require that, as a condition of doing business with Revlon, you will strictly comply with this Third Party Code of Conduct, to the extent applicable to our business relationship. We further require our Third Party Partners to take reasonable steps to ensure that this Third Party Code of Conduct is communicated throughout their organizations and made available to all of their employees and subcontractors who will work with Revlon or in connection with our business.*

*Revlon will work with its Third Party Partners, as appropriate, to ensure that they fully understand the intent and requirements of the Third Party Code of Conduct.*

*Any known or suspected violations of this Third Party Code of Conduct must be promptly reported to Revlon at [compliance@revlon.com](mailto:compliance@revlon.com).*

## COMPLIANCE WITH LAWS

As a Third Party Partner working with Revlon, you are expected to adhere to the highest ethical standards and are required to comply with all applicable laws, rules and regulations of your country as well as all other countries in which you do business with or on behalf of Revlon, or in connection with our products. This includes, but is not limited to, laws relating to anti-bribery and anti-corruption, anti-money laundering, anti-terrorism, antitrust and competition, data privacy and protection, cybersecurity, the environment and health and safety, labor and employment, product manufacturing, product quality and safety, international trade regulations, sanctions, import/export and product registration. If local or industry practices exceed local legal requirements, the higher standard should be met. In cases where the law conflicts with provisions in Revlon's Third Party Code of Conduct, Third Party Partners are expected to comply with laws, while seeking to meet the underlying principles of this Third Party Code.

As a U.S. Company, Revlon may also require its Third Party Partners to comply with certain U.S. laws in connection with Revlon's business or products, as outlined in this Third Party Code or as otherwise agreed to in writing.

## BRIBERY, CORRUPTION & IMPROPER GIFTS

Giving or receiving any kickbacks, bribes or improper gifts or benefits of any kind is strictly prohibited. Revlon requires its Third Party Partners to comply at all times with all applicable anti-bribery and anti-corruption laws and regulations, including, but not limited to, the U.S. Foreign Corrupt Practices Act and U.K. Bribery Act.

As mandated by these laws, Revlon strictly prohibits its Third Party Partners from promising, offering, giving/receiving or providing/facilitating any payments, gifts (including cash and cash equivalent gifts such as gift cards), entertainment, meals, travel, use of personal property, employment, overpayments or discounts, charitable or political donations, Revlon products or anything of value, directly or indirectly (including through a third party), on behalf of Revlon or in connection with Revlon's business, for the purpose of securing any improper business advantage to obtain new or maintain existing business, and/or improperly influencing any official act or business decision. This prohibition applies to anything of value provided to government officials, employees of government entities and state owned or controlled enterprises, as well as to private individuals and entities. Revlon similarly prohibits expediting or making facilitation payments not expressly authorized by local law and supported by an official receipt.

Third Party Partners must ensure they have adequate systems in place to prevent bribery and comply with applicable anti-bribery and anti-corruption laws as well as anti-money laundering and anti-terrorism laws.

## ANTITRUST AND COMPETITION

Revlon requires its Third Party Partners to conduct their business with fair and vigorous competitive practices and in full compliance with all applicable antitrust and competition laws globally. These laws prohibit anti-competitive actions and are intended to promote free and fair competition in order to benefit consumers. Prohibited actions include, but are not limited to, agreements or understandings that restrict free trading, illegal resale price maintenance, the exchange of confidential information between competitors, group boycotts, illegal price discrimination and the abuse of a dominant market position. Third Party Partners are also required to employ fair business practices, including accurate and truthful advertising.

## INTERNATIONAL TRADE REGULATIONS

Revlon's Third Party Partners must comply at all times with applicable trade regulations of the countries in which you operate. In addition, you are required to comply with U.S. trade regulations and other applicable international trade laws (e.g., European Union, United Kingdom, etc.) in connection with Revlon's business or Revlon products, regardless of where in the world you are operating.

Pursuant to U.S. and other applicable international trade laws, Revlon's Third Party Partners are prohibited from conducting any business activity, including but not limited to, directly or indirectly, with or to North Korea, Syria, Cuba, Iran, Crimea Region, Donetsk and Luhansk, including but not limited to the manufacture, distribution or sale of products. Other areas of significant sanctions risk and export controls, include but are not limited to Afghanistan, Belarus, China, Myanmar, Russia, Venezuela, West Bank and Gaza, and Yemen. As a result, advance written authorization from Revlon is required to confirm that any business activity on behalf of Revlon in areas of sanctions risk and/or export controls (including but not limited to the illustrative list above) would comply with U.S. trade laws before engaging in any such activity on Revlon's behalf.

In addition, you are prohibited from conducting any business on Revlon's behalf or in connection with Revlon's business with any person or entity that is the target of government sanctions, especially by the U.S. Government. In order to satisfy this obligation and with the understanding that U.S. embargoed countries and territories and areas of significant sanctions risk and export controls may change from time to time, you are responsible for conducting due diligence on all such persons and entities before engagement using your own resources, including but not limited to online resources at: <https://sanctionssearch.ofac.treas.gov/> and <http://apps.export.gov/csl-search#/csl-search>.

U.S. trade regulations also require that Revlon and our Third Party Partners comply with country-specific sanctions, available online at: <http://www.treasury.gov/resource->

<center/sanctions/Programs/Pages/Programs.aspx>, and refuse to participate in boycotts that are not sanctioned by the U.S. government in connection with Revlon's business.

Additional information on anti-boycott compliance is available online at:  
<https://www.bis.doc.gov/index.php>.

## LICENSING

Third Party Partners must maintain all necessary licenses, permits, certificates, and other requisite government approvals and registrations for the goods and services they provide to the Company.

## ACCURATE BOOKS AND RECORDS

Revlon requires its Third Party Partners to maintain accurate books and records with respect to Revlon's business and will not reimburse expenses incurred by a Third Party Partner unless supported by valid and detailed documentation and expressly identified as reimbursable in a written agreement or otherwise pre-approved by Revlon in writing. Revlon may, from time to time, request to audit the books and records of its Third Party Partners in order to ensure compliance.

## CONFLICTS OF INTEREST

We expect our Third Party Partners to avoid all conflicts of interest or situations creating the appearance of a potential conflict of interest in their dealings with Revlon, on behalf of Revlon or in any connection with our business. Any potential conflict must be disclosed to Revlon Compliance and cleared in advance of proceeding with any relevant business activity.

## HUMAN RIGHTS

Revlon is fully committed to the protection of human rights and strongly opposes the use of illegal child labor, forced labor, and all other forms of human exploitation and unacceptable treatment of workers. Revlon requires that you uphold international labor standards and comply with all applicable laws safeguarding workers such that they are treated with respect and dignity and are not subjected to any physical, verbal, psychological or sexual abuse or misconduct. Revlon will only conduct business with organizations that respect human rights and are fair to their employees.

Revlon prohibits its Third Party Partners from engaging in the following:

- Using forced labor, slavery, or prison labor as defined by local law;
- Using child labor 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; color; 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.

## LABOR AND EMPLOYMENT

Revlon requires its Third Party Partners to comply with all applicable labor and employment laws. Revlon will only work with Third Party Partners who adhere to the following:

- Paying legal minimum wages and providing compensation and benefits for overtime work consistent with local laws and prevailing practices;
- Adopting working hours consistent with local law;
- Complying with applicable immigration laws and regulations in any jurisdiction where they operate and only employ workers with a legal right to work in the relevant location;
- Providing a safe and healthy working environment, including, but not limited to, protecting workers from over exposure to chemical, biological or physical hazards and physically demanding tasks in the workplace and in any company provided living quarters;
- Respecting lawful freedom of association and recognizing and protecting legal rights to organize and collectively bargain; and
- Promoting the goals of assuring equal employment opportunity in connection with the recruitment, hiring, placement, selection, training, development, promotion, transfer, demotion, discipline, compensation and termination of employees.

## HEALTH AND SAFETY

Revlon requires its Third Party Partners to ensure safe, clean and healthy working conditions for your employees, contractors, or other workers. Your facilities, including residential housing that may be provided, must, at a minimum, comply with all applicable health and safety laws and regulations.

## CONFIDENTIAL/PROPRIETARY INFORMATION AND PRIVACY

As a Third Party Partner of Revlon, you are required to protect Revlon's confidential information, proprietary information, trade secrets and any other commercially sensitive business information to which you may have access as a result of your business relationship with Revlon. You are prohibited from improperly using such information for your own purposes or improperly disclosing such information to unauthorized individuals or entities. Third Party Partners must promptly notify Revlon if they become aware of any intentional or unintentional improper disclosure or use of Revlon's commercially sensitive business information.

## DATA PRIVACY AND PROTECTION

Third Party Partners who have access to, handle, process, transfer, repurpose or store the personal data of Revlon's employees, customers and/or consumers are required to comply with all applicable data privacy and protection laws, standards and industry best practices with respect to cybersecurity, data privacy and protection and take all reasonable and appropriate steps to safeguard such information. Third Party Partners must promptly notify Revlon if they become aware of any intentional or unintentional improper disclosure or use of personal information.

## REGULATORY

Third Party Partners selling Revlon products, or causing Revlon products to be sold, are responsible for working with Revlon to ensure that all regulatory, product registration and import/export requirements are met.

## QUALITY AND SAFETY

Revlon conducts business in compliance with all applicable laws governing the manufacture, labeling and distribution of its products and requires its Third Party Partners to do the same in connection with Revlon products. Specifically, Revlon expects its Third Party Partners to produce, package, store, ship and otherwise handle Revlon products (including any components thereof) in accordance with the good manufacturing, distribution and professional service practices prevailing in their respective industries.

Revlon further requires its Third Party Partners to comply with all applicable regulations related to product ingredients and safety.

## ENVIRONMENT

Revlon requires full compliance with all local and national environmental laws and expects that its Third Party Partners take actions to reduce their environmental impact and improve their performance.

## HUMANE TREATMENT OF ANIMALS

Revlon does not condone the use of animal testing in connection with our products. You must not perform, or cause to be performed, any animal testing on materials supplied to our Company, except as required by law and approved by Revlon in advance.

## THIRD PARTY PARTNER SUBCONTRACTING

Where Revlon permits its Third Party Partners to engage in subcontracting, the Third Party Partners are responsible for ensuring that their subcontractors, brokers or agents used in connection with Revlon's business or products, understand and agree to abide by and strictly comply with Revlon's Third Party Code of Conduct. Third Party Partners are responsible for promptly notifying Revlon of any known or suspected violations of this Third Party Code of Conduct or applicable law by their subcontractors, brokers or agents.

## DEMONSTRATING COMPLIANCE

Third Party Partners will demonstrate commitment to the concepts described in Revlon's Third Party Code of Conduct by allocating appropriate resources to managing ethics and compliance risks. Third Party Partners will have mechanisms to assess and manage risks in all areas addressed in Revlon's Third Party Code of Conduct. Third Party Partners will have a training program that educates their employees to make ethical decisions in compliance with applicable laws, regulations and contract requirements and that enables those employees to address these expectations.

Third Party Partners are expected to continually monitor and improve their ethics and compliance management system, consistent with best practices, which include, but are not limited to setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, audits, inspections and management reviews.

## MONITORING COMPLIANCE

In an effort to monitor for compliance, Revlon requires its Third Party Partners to complete its due diligence process, which may include but is not limited to, completing and updating due diligence questionnaires; undergoing background checks and sanctions screening; cooperating with periodic audits and/or providing proof of recent audits conducted, using standard audit protocols with complete findings; and providing additional information, as needed, to demonstrate ongoing compliance with Revlon's Third Party Code of Conduct.

We expect our Third Party Partners to be open and transparent with Revlon regarding their investigations into actual or suspected violations of Revlon's Third Party Code of Conduct. You must promptly report to Revlon Compliance any suspected and/or actual violation of Revlon's Third Party Code of Conduct and/or applicable laws by you, or by any of your employees, subcontractors, brokers, and agents. It is your responsibility to ensure that your employees, subcontractors, brokers, and agents working on Revlon business understand and comply with Revlon's Third Party Code of Conduct.

## REPORTING

Failure to adhere to Revlon's Third Party Code of Conduct or any applicable law (including failure to promptly report any suspected and/or actual violation of this Third Party Code of Conduct or any applicable law) constitutes grounds for Revlon to take appropriate action, including but not limited to: implementing a corrective action plan; canceling any or all order(s) or other pending business; refusing payment or reimbursement for any improper or unauthorized fees or expenses; terminating our relationship with you; and/or taking any available legal action or pursuing other equitable remedies.

Revlon's Third Party Code of Conduct is regularly updated and available online (including in multiple languages) at: <https://www.revloninc.com/suppliers/code-of-conduct>. If you have any questions regarding Revlon's Third Party Code of Conduct, please contact Revlon Compliance:

## **REVLON COMPLIANCE**

### Help Line Numbers:

United States - 844-718-6403  
United Kingdom - 0808 273 5251  
South Africa - +27-872348046  
China North - 10-800-130-1832  
China South - 10-800-713-1871  
Mexico - 800 681 1874  
France - 0 805 98 55 08  
Germany - 0800 1815158  
Spain - 900 876 206  
Japan - 0120-958-134  
South Korea - 00308 491 0127  
Singapore - 800 492 2547  
Taiwan - 00801-49-1736  
Australia - 1800 879 025  
New Zealand - 0800 369 519  
United Arab Emirates - 800 0321233  
Italy - 800 974 713

Email Address: [compliance@revlon.com](mailto:compliance@revlon.com)

### Compliance Help Line Web Form:

