

Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2023 Statement

For Fiscal Year 2025

At e.l.f. Beauty, we are committed to conducting business in a legal, ethical, and responsible manner and recognize the importance of safe working conditions around the world.

This Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2023 statement is made in accordance with section 11(1) of the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2023 and outlines the actions undertaken in the fiscal year listed above to prevent and reduce the risk that forced labor or child labor is used in our business and enterprise.

INTRODUCTION

We provide a safe and healthy workplace and comply with applicable health and safety laws, regulations and international requirements. We support human and workplace rights as articulated in the United Nations' Universal Declaration of Human Rights which recognizes that "all human beings are born free and equal in dignity and rights". Consequently, we take a proactive approach to respecting fundamental human rights and embed this understanding throughout our operations and supply chain.

We expressly prohibit modern slavery of any kind in our operations and supply chain. We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking within our company and by any company that directly supplies or provides services to our business. We prioritize activities and business partners that demonstrate a commitment to respecting fundamental human rights, providing safe and conducive working conditions, and advancing responsible business operations.

In this Fighting Against Forced Labor and Child Labor in Supply Chains Act statement, reference to "we" and "us" generally refer to the entire e.l.f. Beauty group unless expressly provided otherwise.

E.L.F. BEAUTY OVERVIEW

e.l.f. Beauty, Inc. (NYSE: ELF) is fueled by a belief that anything is e.l.f.ing possible. We are a different kind of company that disrupts norms, shapes culture and connects communities, committed to positivity, inclusivity and accessibility.

Our mission is clear: to make the best of beauty accessible to every eye, lip, face and skin concern. e.l.f. Cosmetics, e.l.f. SKIN, Keys Soulcare, Well People and Naturium are led by purpose, driven by results and elevated by our superpowers. e.l.f. Beauty has double Cruelty Free certifications from both Leaping Bunny and PETA, offers e.l.f. clean and vegan products, and proudly stands as the first beauty company to achieve Fair Trade certification across our supply chain. Our brands are available online and from leading beauty, mass-market and specialty retailers.

e.l.f. Cosmetics, Inc. is the primary operating subsidiary of the e.l.f. Beauty group. e.l.f. Cosmetics, Inc. is headquartered in Oakland, California. W3LL People, Inc. and Naturium LLC, each a wholly owned subsidiary of e.l.f. Cosmetics, Inc., own the Well People and Naturium brands, respectively.

OUR SUPPLY CHAIN

We strive to provide products that deliver extraordinary value and efficacy and are safe for consumers. We are driven to “do the right thing” in our business, which includes, among other things, prioritizing suppliers that demonstrate a strong commitment to protecting fundamental human rights, foster safe and conducive workplaces, treat their employees fairly and advance responsible business practices. To achieve this end, we collaborate with our suppliers and key stakeholders to commit ourselves to corporate responsibility through our operations and procurement activities.

Our products are manufactured by third-party suppliers that are diversified globally primarily in Asia, Europe and North America. We prioritize ethical sourcing practices and ensure that our suppliers uphold our principles and values when providing products and services to our Company. We require our suppliers to agree in writing to, and adhere to, our [Supplier Code of Conduct](#). Our Supplier Code of Conduct addresses working conditions for suppliers and specifically prohibits, among other things, the use of involuntary or forced labor, human trafficking, child labor, human rights violations, animal testing, and harassment and abuse.

Our supply chains are relatively complex due to the multi-tiered nature of our sourcing process. While we primarily work with suppliers who deliver finished products, our suppliers rely on subcontractors to perform key production activities. Despite the complexity and multi-tiered nature of our supply chain, we are committed to ensuring ethical practices throughout our supply chain by engaging with our suppliers to ensure that subcontractors are held to the same standards established by our Supplier Code of Conduct.

We depend on our suppliers and their subcontractors for most of the value added throughout our supply chain. Our leadership team oversees our supplier relationships and regularly reviews our supplier base. In cases where suppliers operate in high-risk regions,

we exercise heightened diligence to prevent modern slavery and human rights violations. We hold our suppliers accountable, ensuring they source responsibly, even when decisions fall outside the scope of our purchases. When risks are identified within our supply chain, we collaborate with our suppliers to address these concerns by implementing corrective action plans, with clearly defined timelines for improvement.

We conduct periodic onsite audits of our suppliers with the selection of suppliers to be audited based on criteria such as geography, type of material and impact to the business.

If our audit shows that a Supplier is in violation of our Supplier Code of Conduct or if we suspect a supplier is in violation of any requirement of our Supplier Code of Conduct or our manufacturing or quality agreements, we will conduct an inquiry. If a potential violation is identified, we will promptly address the issue with the supplier and set expectations for how the situation is to be addressed. If a non-compliance issue is not resolved in a timely manner, then we will re-evaluate our business relationship with that supplier, up to and including termination of the business relationship.

PEOPLE AND PRODUCT POLICIES

Human Rights

Our [Human Rights Policy](#) sets out our commitment to respect and promote fundamental human rights throughout our operations and extended supply chain. Our Human Rights Policy also identifies guidelines that should be followed by our employees, partners, and suppliers to adhere to human rights best practices across all operations and monitor potential threats and risks to those rights.

Our policies in this area are guided by international standards including the UN Declaration of Human Rights, the fundamental rights set out in the International Labor Organization's Declaration on the Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

Supplier Code of Conduct

Our supplier Code of Conduct specifies the minimum code of conduct that we require our suppliers and subcontractors to respect and follow when they engage in transactions with and on behalf of us. The standards are designed to protect the rights of workers in the supply chain and ensure compliance with laws.

Our Supplier Code of Conduct among other issues, promotes respect for human rights, freedom of association and collective bargaining, the rights of indigenous people, fair treatment of migrant workers and safe and healthy working environments, prohibits

discrimination, abuse and harassment, forced labor and human trafficking, and child labor, and requires our suppliers to comply with labor-related laws and regulations.

The Supplier Code of Conduct requires our suppliers to establish whistleblowing mechanisms and accept complaints from employees. It also establishes the importance of whistleblower protection and protection from retaliation.

Grievance Mechanisms and Whistleblowing

We have established dedicated channels to ensure that employees have a safe and confidential channel to voice their concerns. We take all employees' concerns seriously and are committed to addressing them promptly and fairly.

Code of Business Conduct and Ethics

Our [Company's Code of Business Conduct and Ethics](#) highlights our expectations for our employees, partners and suppliers on a variety of ethical issues. Our employees are expected to be familiar with the Company's Code of Business Conduct and Ethics, ensuring they will conduct themselves in an honest and ethical manner, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. Our employees are aware that we are obligated to comply with all applicable laws, rules, and regulations, consequently, employees have a personal responsibility to adhere to the standards and restrictions of applicable laws, rules and regulations.

RESPONSIBLE SOURCING POLICIES AND INITIATIVES

We report on our progress and performance regarding responsible sourcing policies and initiatives annually in our Impact Report. For further details on our key performance indicators and progress toward our targets, please visit our most recent Impact Report on our [website](#).

Fair Trade

We're proud to be the first company in the beauty industry to have a third-party manufacturing facility Fair Trade Certified™. This was the culmination of a two-year effort where we and Fair Trade USA™ partnered to create and implement an innovative new framework extending fair trade certification to beauty industry facilities. We have since expanded certification to include additional facilities, including the first Fair Trade Certified™ cosmetic brush manufacturing facility.

Fair Trade USA™ is a nonprofit organization that offers globally recognized sustainable sourcing certification programs. A Fair Trade Certified™ seal on a product signifies that it was made according to rigorous fair-trade standards that promote sustainable livelihoods

and safe working conditions for factory employees, protection of the environment and transparent supply chains.

Third-party Certification

Our products are manufactured by third-party suppliers. We evaluate and monitor the sustainability performance of our suppliers through the EcoVadis sustainability certification program, looking to global best practices across four pillars: Labor & Human Rights, Ethics, Responsible Sourcing, and Environment. We continue to partner with our suppliers to prioritize and implement actions to drive improvement. We rely on third-party certifications and initiatives, such as Forest Stewardship Council™, Roundtable for Sustainable Palm Oil Sourcing, and Responsible Mica Initiative, to ensure adherence of our material and ingredient inputs to the commitments that we have set.

TRAINING

We offer specialized formal training on human trafficking and modern slavery to both employees and management. This training is delivered biennially to procurement and sourcing teams. Full compliance is mandatory for every employee enrolled in the program. Our learning platform features an integrated tracking system that monitors and reports compliance with training requirements. Instances of non-compliance are escalated to the relevant managers, who are responsible for ensuring adherence by team members. Additionally, new hires in our procurement and sourcing teams are required to complete the modern slavery and human trafficking training as part of their onboarding process, with progress tracked and monitored through our internal online platform.

MONITORING, AUDITING & VERIFICATION

We maintain the following procedures to monitor, audit, and verify workplace conditions and human rights practices:

- *Supplier Code of Conduct:* We require all third-party suppliers to adhere to our Supplier Code of Conduct.
- *Periodic On-Site Audits:* We periodically conduct on-site visits to our third-party suppliers to assess, among other things, compliance with our Supplier Code of Conduct.
- *Risk Assessments:* Risk factors considered in the selection of our suppliers where we conduct in-person facility audits and the frequency thereof include geographic risks, industry-associated risks, and the volume of business we do with the supplier. If we assess a supplier as being at high risk in terms of human rights violations, we would

either terminate our relationship with that supplier or work on a remediation plan, which may include a third-party audit.

This report was approved on March 7, 2025, for our 2025 fiscal year by the following:

- the Board of Directors e.l.f. Cosmetics, Inc.
- the Board of Directors of W3LL People, Inc.
- the Managing Member of Naturium LLC.

I have the authority to bind e.l.f. Cosmetics, Inc.

Signed,

A handwritten signature in black ink, appearing to read 'SM', is positioned above the printed name and title.

Scott Milsten
SVP, General Counsel, Chief People Officer, and Secretary