

# HUMAN RIGHTS POLICY

## OVERVIEW

e.l.f. Beauty, Inc. (“e.l.f. Beauty”, the “Company,” or “we”) supports and respects human rights and individual expression and freedom. We believe human rights are universal rights of all humans, regardless of age, gender, ethnicity, or sexual orientation. This Human Rights Policy (this “Policy”) outlines our approach to respect human rights across our global operations and supply chain.

This Policy applies to our employees, contractors, and anyone doing business on our behalf, including third-party agents, consultants, business partners, and suppliers, and their employees.<sup>1</sup>

## OUR APPROACH

We conduct our global business in a manner that respects the human rights and dignity of all. Our approach is based on international standards, such as the United Nations Declaration of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights). We commit to respecting all human rights as outlined in the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact, and the OECD Guidelines for Multinational Enterprises and other applicable OECD guidance.

We strive to take a proactive approach to respecting fundamental human rights and embed this understanding throughout our operations and supply chain. We aim to prioritize activities and partners that demonstrate a commitment to respecting fundamental human rights, providing safe and conducive working conditions, and advancing responsible business operations.

We have several policies and practices in place to help identify, assess, monitor and mitigate or eliminate actual or potential human rights impacts, some of which are discussed below.

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<sup>1</sup> While the human rights principles in this Policy apply, the programs, practices, reporting, investigation, remediation, and other measures detailed herein do not currently cover HRBeauty, LLC (“rhode”), which was acquired by the Company in Q2 FY2026. Once integration efforts are complete, we anticipate that this Policy will also cover rhode.

# **PROGRAMS AND PRACTICES**

## ***respect for human rights***

Respect for human rights is a core value for us. It guides how we operate, from the way we train our employees, to how we engage with our suppliers and conduct our business. We are committed to upholding these principles across all aspects of our operations. We prohibit our employees, contractors, and anyone doing business on our behalf from violating any human rights, including, but not limited to, rights related to bonded, compulsory, forced, or slave labor; child labor; discrimination and harassment; excessive working hours; fair hiring and recruitment practices; fair wages, benefits, and compensation; and the right to healthy, safe, and accessible working conditions.

We respect and uphold our workers' freedom of association and collective bargaining. We do not interfere with or restrict the lawful exercise of these rights and are committed to ensuring our operations and supply chain support democratic workplace practices in line with international labor standards. We expect contractors, and anyone doing business on our behalf, including third-party agents, consultants, business partners, and suppliers to uphold the same standards.

## ***non-discrimination***

We are committed to providing equal opportunities and fostering an inclusive and respectful environment free from discrimination in all aspects of our operations. We treat all employees, applicants, business partners, or community with fairness, dignity, and respect. We do not tolerate discrimination on the basis of race, color, gender, age, national origin, religion, sexual orientation, gender identity or expression, marital status, disability, or any other characteristic protected by applicable laws. We expect our suppliers and business partners to uphold these same principles in their own practices, promoting equity, inclusion, and human rights throughout our value chain.

## ***our suppliers***

We require all of our suppliers to adhere to our published [Supplier Code of Conduct](#) that confirms compliance, among other things, with maintaining a safe and healthy workplace environment, prohibiting the use of child or forced labor, prohibiting discrimination and observing principles of human rights in the workplace.

## ***risk assessments and internal audits***

We assess our suppliers for potential risks of human rights violations and conduct periodic, announced onsite audits of our suppliers to assess, among other things, compliance with our Supplier Code of Conduct. We select which of our suppliers we are going to audit (and the frequency of audits) based on a number of factors, including geographic risks, industry-associated risks, and the volume of business we do with the supplier.

If our audit shows, or we suspect, that a supplier is in violation 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 address the

issue with the supplier and set expectations for how the situation is to be addressed, and if needed, agree on a remediation plan. If a non-compliance issue is not resolved in a satisfactory manner, we will re-evaluate our business relationship with that supplier, up to and including termination of the business relationship.

We have not, to date, assessed a supplier as high risk in the area of human rights.

### ***due diligence and disclosures***

Due diligence is an ongoing process, to identify, mitigate, and prevent risks and address their existing and potential adverse impact. To prevent and reduce the risk of human rights violations in our business, we conduct internal and external assessment of risks of human rights violations in our activities and supply chain through third party assessments, audit and certifications.

Our Modern Slavery and Supply Chain Transparency statements, available on our [Impact site](#), reinforce our stance on respect for human rights and identifies our approach to ensuring that our supply chain and operations are free of human trafficking, child, and forced labor.

### ***third party performance assessments, audit and certifications***

In addition to our internal audits, we evaluate and monitor supplier performance on human rights by relying on third party assessments, audits and certifications of our suppliers. These include EcoVadis 360° ESG assessments, Fair Trade, Leaping Bunny, Business Social Compliance Initiative, ISO 22716:2007 ISO 9001:2015, ISO 14001:2015, and SA8000. For example, our suppliers that are Fair Trade Certified™ undergo audits by Fair Trade USA™ and are required to demonstrate adherence to over 100 compliance criteria which cover social responsibility, environmental responsibility, empowerment and economic development. Additionally, 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 our material and ingredient suppliers adhere to respecting human rights.

We continue to partner with our suppliers to prioritize and implement actions to drive improvement. For more information including data, facts, and activities that demonstrate how we are performing in relation to our supplier relations, please visit our latest Impact Report.

### ***training and engagement***

We require that our employees in our supply chain and operations departments take formal training on human trafficking and modern slavery. We also will engage internal teams responsible for implementing and ensuring compliance with this Policy. This engagement includes communicating any material updates and changes to the Policy to our senior leadership team and Board of Directors.

# **REPORTING, INVESTIGATION, AND REMEDIATION**

We believe in providing grievance mechanisms that allow anyone affected by our operations or the operations of anyone doing business on our behalf to report a potential violation of this Policy, any of our other policies, or applicable laws, rules and regulations.

## ***grievance mechanism and reporting***

In line with our value of “Doing the Right Thing”, we encourage our employees and contractors to talk to their managers and other appropriate personnel when in doubt about the best course of action in a particular situation and/or report suspected violations any of our policies, or applicable laws, rules and regulations.

We ensure that no adverse action will be taken against any employee, former employee, agent or third party for complaining about, reporting, participating in or assisting in the investigation of a suspected violation of our policies or applicable laws, rules and regulations.

## ***telephone hotline***

The Company provides a hotline for employees to anonymously report a suspected violation of our policies, a suspected violation of applicable laws, rules and regulations, or other incidents. To access this hotline from the United States, United Kingdom, or India, anyone may call 1-844-240-0005 (English) or 1-800-216-1288 (Spanish).<sup>2</sup> To access this hotline from Shanghai, China, anyone may call 10-811, then 800-603-2869.

These numbers are operated by an independent third-party service provider specifically engaged to identify improper activity. Anonymity, if requested, will be protected.

## ***internet***

Anyone may go to [www.lighthouse-services.com/elfcosmetics](http://www.lighthouse-services.com/elfcosmetics) to report a suspected violation of our policies, a suspected violation of applicable laws, rules and regulations, or other incidents.

This online form is managed by an independent third-party service provider specifically engaged to identify improper activity. Anonymity, if requested, will be protected.

## ***investigation***

We will conduct a thorough investigation on every suspected violation of our guidelines or applicable law within our facilities and operations. Our senior leadership team shall ensure that a prompt and thorough investigation is conducted, with notification to our human resources and legal departments as necessary.

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<sup>2</sup> Callers from the United Kingdom and India must dial their country's exit code followed by the hotline number.

## ***remediation***

If we determine that we, any of our employees or contractors, or anyone doing business on our behalf has caused or contributed to a violation of this Policy, we will take necessary and appropriate steps to remedy the negative impact. We will work with directly impacted individuals or groups or their representatives to understand the root cause of the violation and build systems to avoid future negative impacts.

## **OVERSIGHT**

This Policy was formally approved by the Board of Directors of the Company (the "Board") and the executive leadership team and applies worldwide to all employees and partners of the Company. Oversight of human rights matters lies with the Board, primarily through the Nominating and Corporate Governance Committee. Our sustainability, legal, and sourcing teams work together to implement this Policy and keep the Board and leadership informed on our progress and impact.

*Last updated: August 2025*