

# INGREDIENT SAFETY AND TRANSPARENCY POLICY

## OVERVIEW

e.l.f. Beauty, Inc. ("e.l.f." or the "Company") is committed to delivering premium-quality beauty products, formulated with ingredients that have the health and safety of our consumers in mind. We believe our ability to deliver clean, cruelty-free, premium-quality products at accessible prices differentiates us in the beauty industry. As we continue to innovate and develop new products, as well as reformulate existing products, quality and safety remain our highest priorities.

## PROGRAMS AND PRACTICES

### ***our commitment to quality and safety starts in the development stage.***

Our commitment to quality and safety starts in the product development stage. As of March 31, 2021, we had 49 e.l.f. Beauty professionals involved in innovation, education, research and development (R&D) and quality across our two innovation hubs in Oakland, CA and Shanghai, China. These professionals work closely with our network of third-party suppliers on new product innovation and quality. The raw materials used in our products are broadly available and have regular quality testing for ingredient integrity.

### ***we formulate our products with clean ingredients.***

The concept of "clean beauty" is a popular topic in beauty today with a lot of definitions used in the industry. In January 2022, we publicly committed to 100% clean beauty and used our social media channels to help explain to our community what "clean" means for e.l.f. Beauty.

At e.l.f. Beauty, our products are formulated with ingredients that have the health and safety of our consumers in mind. All our products are formulated to meet Food and Drug Administration (FDA) and European Union Cosmetic Regulation (EUCR) restrictions on over 1,600 ingredients including, but not limited to:

- Parabens,
- Phthalates,
- Palm Oil,
- Sulfates,
- Formaldehyde,
- Nonylphenol Ethoxylates,
- Triclosan,
- Triclocarban,
- Toluene,

- Coal Tar,
- Lead,
- Mercury,
- Acrylamide, and
- Hydroquinone.

We continuously review our manufacturing processes and partners, as well as broader consumer sentiment, to expand the list of ingredients we choose not to formulate with. On top of the over 1,600 ingredients restricted by the FDA and EUCR, in FY 2022 we identified an additional 49 ingredients that we no longer use. Our team reformulated over 350 product SKUs to exclude these ingredients.

Additionally, e.l.f. Beauty does not use any Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) substances of very high concern (SVHC) or California Department of Toxic Substances Control (DTSC) Candidate Chemicals in any of our products.

Further, we do not use palm oil in our products. We require that any palm derivatives in new product formulations be certified by the RSPO (Roundtable on Sustainable Palm Oil), a global standard for sustainable palm oil.

### ***Well People is a pioneer brand in clean beauty.***

Well People is a clean beauty pioneer, raising the standard for high-performance, organic certified, plant-powered, cruelty-free cosmetics since 2008. Well People's product line includes 40 Environmental Working Group (EWG) VERIFIED™ products, a leading standard of "clean and healthy" in the beauty space.

As recognized by the Environmental Working Group, an EWG VERIFIED™ product indicates that the product:

- **Avoids EWG's ingredients of concern:** Products cannot contain any ingredients on EWG's "Unacceptable" list, meaning ingredients with health, ecotoxicity and/or contamination concerns.
- **Provides full transparency:** Must meet EWG's standards for ingredient disclosure on the label, provide full transparency to EWG, including fragrance ingredients.
- **Uses good manufacturing practices:** Product manufacturers must develop and follow current good manufacturing practices to further ensure the safety of their products.

## **MONITORING, AUDITING & VERIFICATION**

### ***we are transparent with our consumers and value their feedback.***

We publish the full ingredient list for all of our products on our brand e-commerce websites [elfcosmetics.com](http://elfcosmetics.com), [wellpeople.com](http://wellpeople.com), and [keyssoulcare.com](http://keyssoulcare.com), under the INGREDIENTS tab on each product's

page. We also take the time to explain to our community what various ingredients mean and why we use a particular ingredient in our product formulas.

Our community can also provide feedback and leave questions about each product on the REVIEW and Q&A tabs respectively. This interaction provides important inputs to our quality and safety procedures.

### ***we ensure compliance with our quality and safety commitments.***

We promptly review and addresses any alleged non-conformance incident that is brought to our attention. Based on the specific situation, we will provide the information or explanation to resolve the complaint.

e.l.f. Beauty has not had a product recall. If a recall should happen, the Company would follow the data reporting requirements under the applicable regulatory recall procedures.

e.l.f. Beauty has not had any material legal and/or regulatory fines, settlements or enforcement actions associated with false, deceptive, or unfair marketing, labeling and advertising. If such an event were to occur, we would disclose relevant information if it was deemed material.

## **OVERSIGHT**

This Policy applies worldwide to all employees and partners of e.l.f. Beauty. These guidelines were approved by the Board of Directors and Executive Team of the Company.

*Last updated: September 2022*