

# ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

## OVERVIEW

e.l.f. Beauty, Inc. ("e.l.f." or the "Company") is committed to conducting its business activities with the highest degree of honesty and ethical behavior. An important part of honoring that commitment is making sure that everyone at the Company upholds our standards of ethical business conduct. Our corporate Anti-Corruption Policy (the "Policy") is designed to uphold our values and maintain compliance with anti-corruption laws in countries where we operate. e.l.f. Beauty also expects its suppliers and partners to observe these principles when providing products and services to the Company.

## PROGRAMS AND PRACTICES

The Policy makes clear that under no circumstances may any director, officer, employee, or agent give or receive bribes of any kind. The Company makes no distinction between bribery of government officials and bribery of workers in the private sector: both are equally unacceptable. Further, employees are not permitted to give or offer anything of value to anyone to improperly gain or retain business. The Policy also sets forth specific rules regarding:

- gift giving (for gifts not given to improperly gain or retain business, which are prohibited as stated above);
- the payment of entertainment and travel expenses for government officials and business partners in connection with Company business (and setting forth prohibited types of payments);
- the prohibition of hiring individuals, without express approval, with personal or professional ties to government officials or business partners that the Company works with;
- the prohibition on making political or charitable donations in the Company's name to obtain a business advantage; and
- the requirement to receive prior approval and conduct due diligence prior to hiring specified agents (including a consultant or other similar intermediary who has a relationship with government officials or business partners on the Company's behalf).

## TRAINING

All of our salaried employees are required to review and sign our [Code of Business Conduct and Ethics](#). We have published a [Supplier Code of Conduct](#) that details compliance expectations for suppliers with, among other things, prohibiting bribery and corruption, and prohibiting the unfair provision of gifts and entertainment.

## OVERSIGHT

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

## MONITORING, AUDITING & VERIFICATION

### *internal reporting channels*

The Company promotes ethical behavior and encourages covered parties to talk to managers and other appropriate personnel when in doubt about the best course of action in a particular situation. e.l.f. Beauty ensures 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 this policy, the Company's [Code of Business Conduct and Ethics](#), other Company policy or applicable law.

We created the following channels for employees and external parties to obtain guidance, ask questions and report any alleged violation of the Company's [Code of Business Conduct and Ethics](#) or applicable laws/policies:

- **Telephone Hotline:** Any person may call 1-844-240-0005 (from the United States) or 10-811, then 800-603-2869 (from Shanghai, China) to report an incident. The phone call will be received by an independent third-party service provider specifically engaged to identify improper activity.
- **Internet:** Any e.l.f. Beauty employee may go to [www.lighthouse-services.com/elfcosmetics](http://www.lighthouse-services.com/elfcosmetics) to report an incident. The link opens an Incident Form text box in which an employee may submit an incident report. The Incident Forms are managed by an independent third-party service provider specifically engaged to identify improper activity. Employee anonymity will be protected.

e.l.f. Beauty will conduct a thorough investigation on every suspected violation of our guidelines or applicable law within our facilities and operations. The Executive Team member of the department where the alleged violation occurred shall ensure that a prompt and thorough investigation is conducted, with notification to Human Resources and Legal as appropriate.

*Last updated: September 2022*