

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 August 2023, we had 58 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 ingredients that meet our standards of “clean.”

The concept of “clean beauty” continues to be a widely discussed topic, with many definitions used across the beauty industry. In January 2022, we publicly committed to 100% clean beauty and use 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 regularly evaluate the list of ingredients with which we choose not to include in our products, including reviewing our manufacturing processes and partners and considering new scientific data and broader consumer sentiment. In FY 2023, we reformulated over 300 product SKUs to exclude several additional ingredients above and beyond FDA and EU CR restrictions, including cyclic silicones D5 and D6 and PFAS.

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.

we are committed to responsibly sourcing sensitive ingredients.

Recognizing that the production of mica and palm oil derivatives can impact human rights and the environment, we are focused on ensuring that our procurement practices directly address these challenges. We have established robust goals related to mica and palm-based ingredients and are working to achieve these.

- **Mica.** Mica is a naturally occurring mineral used to provide opacity and pearlescent appearance in many of our pigmented products. We have set a public goal to have 100% of our Indian mica responsibly sourced through Responsible Mica Initiative (RMI) members. In FY 2023, approximately 30% of the mica purchased by our suppliers for use in our products was sourced from India. All of this Indian mica was and continues to be sourced through RMI members who are committed to that organization's rigorous standards to enable a responsible and sustainable mica supply chain in India free of child labor. Our suppliers source the remaining 70% of mica for our products from other countries, primarily China. For this supply, we require documentation of fair labor standards through the supply chain.
- **Palm Oil.** Palm derivatives are used in a portion of our products. We are working to ensure that any palm derivatives purchased by our suppliers are from sources certified by the Roundtable for Sustainable Palm Oil Sourcing (RSPO) and set a public goal to achieve 100% RSPO-certified palm oil procurement by FY 2027 as compared to 50%¹ in FY 2023. RSPO is a global, non-profit organization focused on bringing together

¹ This reported figure is not audited through RSPO Certification.

stakeholders from across the palm oil supply chain to develop and implement global standards for sustainable palm oil. Since FY 2023, any palm derivatives sourced for use in our new products are RSPO-certified and we are transitioning existing products with palm derivatives to RSPO-certified sources.

Well People is a pioneer brand in clean beauty.

Well People is a clean beauty pioneer, raising the standard for plant-powered, high-performance beauty since 2008. In FY 2023 Well People doubled its number of Environmental Working Group (EWG) VERIFIED™ products, a leading standard of “clean and healthy” in the beauty space. Today, Well People has over 100 EWG VERIFIED™ products, representing nearly 80% of the formulated product line.

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 community and value their feedback.

We publish the full ingredient list for all of our products on our brand e-commerce websites (elfcosmetics.com, elfskin.com, wellpeople.com and 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. For example, we host fun and engaging ingredient education sessions on our social channels.

We view this as a two-way communication, encouraging our community to provide product feedback and leave questions on the product review and Q&A tabs, respectively. This interaction provides important inputs to our product 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 2023