

## Beautycounter

Publicly Available CFP 2021 Survey Responses

Relevant Links and Public Information

Q #	Question	Responses
	Manufacturer/ No manufacturing	Manufacturer
	Formulated Products/Articles/Both	Formulated Products
	Products/Packaging/Both	Both
<b>Pre-questions</b>		
<b>P1</b>		
P1.1	What size is your company?	
P1.1.a	Our company is privately held. (Enter FY 2020 revenue within a range in question 2 below.)	X
P1.1.b	Our company is publicly traded. (Enter FY 2020 revenue in question 3 below.)	
<b>P1.2</b>		
P1.2	Our company is privately held, with FY 2019 revenue of: (Follow up to question 1)	
P1.2.a	FY 2019 revenue greater than \$50 billion	
P1.2.b	FY 2019 revenue greater than \$5 billion and less than or equal to \$50 billion	
P1.2.c	FY 2019 revenue greater than \$0.5 billion and less than or equal to \$5 billion	
P1.2.d	FY 2019 revenue less than or equal to \$0.5 billion	X
<b>P1.3</b>		
P1.3	Our company is publicly traded, with FY 2020 revenue of:	
P1.3		
<b>P2</b>		
<b>P2.1</b>		
P2.1	Indicate the scope of your product portfolio for which you are reporting.	
P2.1.a	All product lines	d. 76 - 100%
P2.1.b	Select product lines or divisions.	
<b>P2.2</b>		
P2.2	Indicate the product lines or divisions for which you are reporting. (Follow up to question 1)	
<b>P3</b>		

P3.1	Does your company agree to disclose its participation in the CFP survey?	
P3.1.a	Yes	X
P3.1.b	No	
P4		
P4.1	Indicate your reporting year: mm/yyyy–mm/yyyy	
P4.1		01/2020 - 12/2020
<b>Management Strategy</b>		
M1		
M1.1	Does your company have a chemicals policy that addresses products?	
M1.a	Yes	X
M1.b	No	
M1.2	Our company's chemicals policy for products: (Follow up to question 1)	
	Choose all that apply.	
M1.2.a	Addresses the reduction of chemicals of high concern in our products	X
M1.2.b	Includes an explicit preference for safer alternatives in our products	X
M1.2.c	Is publicly disclosed	X
M1.3	Does your company have a chemicals policy that addresses packaging?	
M1.3.a	Yes	X
M1.3.b	No	
M1.4	Our company's chemicals policy for packaging: (Follow up to question 3)	
	Choose all that apply.	
M1.4.a	Addresses the reduction of chemicals of high concern in our packaging	X
M1.4.b	Includes an explicit preference for safer alternatives in our packaging	X
M1.4.c	Is publicly disclosed	X
M1.5	5. Does your company have a chemicals policy that addresses manufacturing?	
M1.5.a	Yes	X

M1.5.b	No	
M1.6	Our company's chemicals policy for manufacturing: (Follow up to question 5)	
	Choose all that apply.	
M1.6.a	Addresses the reduction of chemicals of high concern in our manufacturing	X
M1.6.b	Includes an explicit preference for safer alternatives in our manufacturing	X
M1.6.c	Is publicly disclosed	X
M1.7	7. Does your company have a chemicals policy that addresses its supply chain?	
M1.7.a	Yes	X
M1.7.b	No	
M1.8	Our company's chemicals policy for its supply chain: (Follow up to question 7)	
	Choose all that apply.	
M1.8.a	Addresses the reduction of chemicals of high concern in our supply chain	X
M1.8.b	Includes an explicit preference for safer alternatives in our supply chain	X
M1.8.c	Is publicly disclosed	X
M1.9	Does your company have a chemicals policy that addresses its facilities?	
M1.9.a	Yes	
M1.9.b	No	X
M1.10	Our company's chemicals policy for its facilities: (Follow up to question 9)	
	Choose all that apply.	
M1.10.a	Addresses the reduction of chemicals of high concern in our facility	
M1.10.b	Includes an explicit preference for safer alternatives in our facilities	
M1.10.c	Is publicly disclosed	
M2		
M2.1	Is reducing the use of chemicals of high concern and advancing safer alternatives beyond regulatory requirements integrated into your company's business strategy? (4 points)	

M2.1.a	Our company has integrated strategies listed in question 2, below, into our business strategy.	X
M2.1.b	Our company has not integrated strategies listed in question 2, below, into our business strategy.	
M2.2	We have integrated the following into our company's business strategy: (Follow up to question 1)	
	Choose all that apply.	
M2.2.a	We screen for chemicals of high concern in product and/or packaging design and/or procurement.	X
M2.2.b	We have a list of safer chemicals or safer materials that are preferred in product and/or packaging design and/or procurement.	X
M2.2.c	We avoid the use of chemicals of high concern in our manufacturing processes.	X
M2.2.d	Our company highlights the use of safer chemicals and materials in its product marketing.	X
M3		
M3.1	Does your company advocate externally for the use of safer chemicals?	
M3.1.a	Our company advocates externally to promote the actions listed in question 2, below.	X
M3.1.b	Our company does not advocate externally to promote the actions listed in question 2, below.	
M3.2	Our company engages in external initiatives that clearly promote the: (Follow up to question 1)	
	Choose all that apply.	
M3.2.a	prioritization of chemicals for reduction based on their inherent hazards	X
M3.2.b	development and adoption of safer alternatives, including green chemistry solutions	X

M3.2.c	public disclosure of chemicals of high concern or other chemical ingredients in products	X
<b>M4</b>		
M4.1	Does your company have in place means of accountability to ensure implementation of your chemicals policy?	
M4.1.a	Our company has means of accountability listed in question 2, below, to ensure implementation of our chemicals policy.	X
M4.1.b	Our company does not have means of accountability listed in question 2, below, to ensure implementation of our chemicals policy	
M4.2	Our company: (Follow up to question 1)	
	Choose all that apply.	
M4.2.a	delineates chemicals management responsibilities in job descriptions and individual annual performance metrics	X
M4.2.b	assigns member(s) of senior management responsibility for meeting chemical policy goals and objectives	X
M4.2.c	has financial incentives for senior management to meet corporate sustainability goals. These goals include reducing the use of some or all chemicals of high concern.	X
M4.2.d	has Board level engagement in the implementation of our chemicals policy	X
<b>Chemical Inventory</b>		
<b>I1</b>		
I1.1	What is the scope of chemicals of concern you restrict in your products and manufacturing processes?	
I1.1.a	Our company has developed a list of chemicals of concern.	X
I1.1.b	Our company has not developed a list of chemicals of concern.	

11.2	Our company: (Follow up to question 1)	
	Choose one option for "a - d," and/or "e" and/or "f" if applicable.	
11.2.a	Uses a restricted substances list (RSL) or lists for products to manage legal compliance within each market where it operates. Our RSL(s) include(s) only chemicals that are legally restricted in each market.	
11.2.b	Uses a single RSL for products that reflects the strictest regulation in all of the countries or markets in which the brand operates and sells products (e.g., regulations that apply to manufacturing, marketing, and sales locations).	
11.2.c	Uses a single RSL for products that reflects the strictest regulation in all locations worldwide.	
11.2.d	Uses a single RSL for products that includes voluntary limits or bans of chemicals beyond what is covered in the most restrictive global regulations, or it includes chemicals that may not be subject to regulation but which the registrant has voluntarily chosen to limit or ban	X
11.2.e	Our company has developed an manufacturing restricted substances list (MRSL) for manufacturing process chemicals.	X
11.2.f	Uses a list of chemicals identified for reduction beyond regulatory requirements. Our company may or may not require suppliers to eliminate these chemicals in products, parts, or components.	X
12		

I2.1	What actions does your company take to ensure that its requirements regarding chemicals of concern are current and implemented effectively? (Respond only if you selected option a for question I1.2.)	
I2.1.a	Our company takes actions listed in question 2, below, to ensure that its requirements are current and implemented effectively.	X
I2.1.b	Our company does not take actions listed in question 2, below, to ensure that requirements regarding our list of chemicals of high concern are current and implemented effectively.	
I2.2	Our company: (Follow up to question 1)	
	Choose all that apply.	
I2.2.a	delineates compliance requirements in contracts with suppliers	X
I2.2.b	trains suppliers about how to comply with our requirements	X
I2.2.c	updates our RSL/MRSL/ other requirements at minimum on an annual basis	X
I2.2.d	publicly discloses our RSL/MRSL/other requirements.	
I3		
I3.1	What chemical information does your company, either directly or through a respected third-party, collect from suppliers?	
I3.1.a	Our company collects chemical ingredient information from suppliers.	X
I3.1.b	Our company does not collect chemical ingredient information from suppliers.	
I3.2	Our company: (Follow up to question 1)	
	Choose all that apply.	
I3.2.a	Our company requires suppliers to confirm that they comply with our RSL.	X

13.2.b	Our company requires suppliers to confirm that they comply with our RSL and to provide information on chemicals on our Watch List, which includes at least 10 chemicals.	X
13.2.c	Our company requests that suppliers to provide full chemical ingredient information.	X
13.2.d	Our company requires suppliers to provide full chemical ingredient information.	X
14		
14.1	For what percentage of formulated products sold by your company do you collect full chemical ingredient information? (Respond only if you selected options c or d for question 13.2.)	
		1.00
14.2	For what percentage of articles sold by your company do you collect full chemical ingredient information? (Respond only if you selected options c or d for question 13.2.)	
15		
15.1	What capabilities does your company have for managing data on chemical ingredients in its products and packaging?	
15.1.a	Our company has capabilities for managing data on chemical ingredients in products and/or packaging listed in question 2, below.	X
15.1.b	Our company does not have capabilities for managing data on chemical ingredients in products or packaging listed in question 2, below.	
15.2	Our company: (Follow up to question 1)	
	Choose all that apply.	



15.2.a	an internal named point(s) of contact or outside contractor who communicates with suppliers concerning our chemical information requirements	X
15.2.b	a data system (either internal or third party) to manage an inventory of chemicals in products and/or packaging	X
15.2.c	a data system (either internal or third party) that links our inventory of chemicals in products and/or packaging to chemical hazard information	X
15.2.d	a data system for generating reports on chemical/material ingredient declarations to customers	X
<b>16</b>		
16.1	1. How does your company ensure conformance with your chemicals requirements?	
16.1.a	a. Our company ensures conformance with chemicals requirements through methods listed in question 2, below.	X
16.1.b	b. Our company does not ensure conformance with chemicals requirements through methods listed in question 2, below.	
16.2	2. Our company: (Follow up to question 1)	
	Choose all that apply.	
16.2.a	a. has an audit program to verify supplier submitted data	X
16.2.b	b. requires suppliers to test parts in third party approved labs and provide results	X
16.2.c	c. trains suppliers on how to comply with reporting requirements	X
16.2.d	d. routinely tests parts, components, or products to assure conformance with reporting requirements	X
<b>Footprint Measurement</b>		
<b>F1</b>		

F1.1	Has your company set goals for reducing chemicals of high concern in the products you sell and measured progress toward these goals?	
F1.1.a	Yes	X
F1.1.b	No	
F1.2	Our company: (Follow up to question 1)	
	Choose all that apply.	
F1.2.a	has set goal(s) for reducing chemicals of high concern by count or mass	X
F1.2.b	has set a goal to eliminate one or more chemical classes of concern.	X
F1.2.c	has set a goal to reduce its chemical footprint (See definition of "chemical footprint" in instructions.)	X
F1.2.d	publicly discloses the goal(s), at minimum, including percentage reduction and time period	
F1.2.e	publicly discloses specific chemicals of high concern included in the goal(s)	
F1.2.f	publicly reports annually on progress towards meeting goals	
F1.2.g	has no chemicals of high concern in our products or packaging and publicly discloses this information (See definition of "chemicals of high concern" in instructions.)	
F2		
F2.1	How does your company measure its baseline chemical footprint for the most recent year for which you have data?	
F2.1.a	Our company has calculated its chemical footprint.	X
F2.1.b	Our company is unable to calculate its chemical footprint at this time.	
F2.2	Our company: (Follow up to question 1)	
	Choose one. Provide a narrative summary of how you calculate your company's chemical footprint.	

F2.2.a	Has calculated its chemical footprint by mass using the CFP CoHC Reference List	X
F2.2.b	Has calculated its chemical footprint by count using the CFP CoHC Reference List	
F2.2.c	Has calculated its chemical footprint by mass using the EU SVHC Reference List	
F2.2.d	Has calculated its chemical footprint by count using the EU SVHC Reference List	
F2.2.e	Has no intentionally added chemicals of high concern, using the CFP CoHC Reference List	
F2.3	Our company's chemical footprint in kilograms is: (Required response if you selected options a or c for question 2.)	
	Enter footprint in kilograms below.	
		2945.728
F2.4	Our company's normalized chemical footprint in kilograms is: (Respond only if you selected option a for question 2. This is a pilot question and is optional.)	
F2.4	Enter normalized footprint in kilograms below.	
F2.4		0.00359
F2.5	Our company's chemical footprint by count is: (Required response if you selected options b or d for question 2.)	
F2.5	Enter footprint by number of chemicals of high concern in your product portfolio below.	
F2.5		2.00
<b>F3</b>		
F3.1	Over the most recent year for which you have data, how much have intentionally added chemicals of high concern in your products and/or packaging changed?	
F3.1.a	Our company has calculated the change in intentionally added chemicals of high concern.	X
F3.1.b	Our company is unable to answer this question at this time.	

F3.2	Our company: (Follow up to question 1)	
	Choose one.	
F3.2.a	has calculated the change in its chemical footprint by mass, using the CFP CoHC Reference List (See instructions for definition of "chemical footprint")	X
F3.2.b	has calculated the change in its chemical footprint by count, using the CFP CoHC Reference List	
F3.2.c	has calculated the change in its chemical footprint by mass, using the EU SVHC Reference List	
F3.2.d	has calculated the change in its chemical footprint by count, using the EU SVHC Reference List	
F3.2.e	is unable to calculate its baseline chemical footprint for beginning of reporting period. However, it is able to calculate the change in the number and/or mass of intentionally added chemicals of high concern over the reporting period.	
F3.2.f	had no products containing intentionally added chemicals of high concern, using the CFP CoHC Reference List, for the reporting period.	
F3.2.g	has reduced our total chemical footprint from last year's baseline.	
F3.3	Our company's change in chemical footprint in kilograms is: (Required response if you selected options a or c for question 2.) (Optional)	
	Enter your change in chemical footprint in kilograms below.	
F3.3		943.448
F3.4	(Optional): Our company's change in its normalized chemical footprint (kg CoHCs/total kg of products in scope) in kilograms is:	
	Enter your change in normalized chemical footprint in kilograms below.	

F3.4		+0.000481 kg CoHC/kg product
F3.5	Our company's change in chemical footprint by count is: (Required response if you selected options b or d for question 2.)	
	Enter your change in chemical footprint by number of chemicals below.	
F3.5		
F3.6	Our company has eliminated the following number and/or mass of chemicals of high concern and/or chemical classes in the past year. (Respond only if you selected option e for question 2.)	
F3.6	Enter your change in chemicals of high concern by number and/or kilograms below.	
F4		
F4.1	How does your company assess the hazards of chemicals in its products and/or packaging, and for what percent of your products has your company assessed these hazards?	
F4.1.a	Our company assesses the hazards of chemicals in our products and/or packaging.	X
F4.1.b	Our company does not does not currently assess the hazards of chemicals in its products and/or packaging beyond regulatory requirements.	
F4.2	Our company: (Follow up to question 1)	
	Choose one or both options.	
F4.2.a	uses a system or tool (internal or third party) to evaluate chemical hazards. Identify the system or tool in attached documentation.	X

F4.2.b	asks suppliers to provide their evaluations of chemical hazards in the products they sell to us.	
F4.3	Our company has assessed hazard for the following percent of our products and/or packaging: (Required response if you selected options a and/or b for question 2.) (Optional)	
	Indicate what percent of products and/or packaging are screened for hazard.	
F4.3		1.00
<b>F5</b>		
F5.1	How does your company encourage the use of safer alternatives to chemicals of high concern?	
F5.1.a	Our company encourages the use of safer alternatives to chemicals of high concern using methods listed in question 2, below.	X
F5.1.b	Our company does not encourage the use of safer alternatives to chemicals of high concern using methods listed in question 2, below.	
F5.2	Our company: (Follow up to question 1)	
	Choose all that apply.	
F5.2.a	has developed a definition for a safer alternative that is consistent with the CFP definition, and we include such criteria in our business processes,	X
F5.2.b	communicates about and asks suppliers to use our company's criteria for a safer alternative,	X
F5.2.c	rewards suppliers that use safer alternatives,	
F5.2.d	has integrated our company's criteria for a safer alternative into our product and/or packaging development process (e.g., through our design and safety processes),	X

F5.2.e	has established a goal and is tracking progress to improve the profile of chemicals across our products and/or packaging, consistent with our company's criteria for a safer alternative, and/or	X
F5.2.f	publicly discloses our company's definition for a safer alternative and our approach to integrating it into our business practices.	X
F5.2.g	If neither your company's products nor packaging contain chemicals of high concern, using the CFP CoHC Reference List, please describe in documentation how it ensures that the safest chemicals available are used.	
<b>Public Disclosure and Verification</b>		
<b>D1</b>		
D1.1	What information does your company disclose about the chemical ingredients in its formulated products?	
D1.1.a	All intentionally added chemicals, except fragrances and flavors in products at the SKU level	
D1.1.b	All intentionally added chemicals including fragrances, flavors, and non-functional constituents in products at the SKU level	1.00
D1.1.c	Neither of the above	
D1.2	Our company publicly discloses the identity of all intentionally added chemicals, except fragrances and flavors in products at the SKU level for the following percent of our formulated product portfolio: (Required response if you selected option a for question 1.)	
	Enter percent below.	
D1.2		

D1.3	Our company publicly discloses all intentionally added chemicals including fragrances, flavors, and non-functional constituents in products at the SKU level for the following percent of our formulated product portfolio: (Required response if you selected option b for question 1.)	
	Enter percent below.	
D1.3		
D1.4	What information does your company disclose about the chemical ingredients in its articles?	
	Choose all that apply.	
D1.4.a	Generic material content for 95% by mass of chemicals in products at the SKU level	
D1.4.b	Chemical identity for 95% by mass of chemicals in products (e.g., Health Product Declaration) at the SKU level	
D1.4.c	Neither of the above	
D1.5	Our company discloses generic material content for 95% by mass of chemicals in products at the SKU level for the following percent of our article portfolio: (Required response if you selected option a for question 6.)	
D1.5	Enter percent below.	
D1.6	Our company discloses the chemical identity for 95% by mass of chemicals in products for the following percent of our article portfolio: (Required response if you selected option b for question 6.)	
D1.6	Enter percent below.	
D1.6		
D2		
D2.1	Does your company agree to publicly disclose its responses to the CFP Survey?	
D2.1.a	Yes	X
D2.1.b	No	



<b>D3</b>		
D3.1	1. Does your company agree to publicly disclose its score on the CFP website?	
D3.1.a	a. Yes	X
D3.1.b	b. No	
<b>D4</b>		
D4.1	1. Have any of your company's responses to the questions in the Survey been verified by an independent third party?	
D4.1.a	a. Yes	X
D4.1.b	b. No	
	2. Our company's response options have been verified by an independent third party for: (Follow up to question 1)	
	Choose one.	
D4.1.a	a. one of our response options	
D4.1.b	b. two to four of our response options	
D4.1.c	c. at least eight of our response options	
D4.1.d	d. at least twelve of our response options	
and	e. all response options except D2, D3, and D4	X
	<b>TOTAL</b>	<b>97.25</b>

## Relevant Links and Public Information

### M– Management Strategy

Beautycounter's chemical policy addresses the reduction of chemicals of high concern, states an explicit preference for safer alternatives in products, packaging, manufacturing and supply chain and is publicly disclosed.

#### M1.2 Products

Beautycounter's chemicals policy addresses the reduction of chemicals of high concern in products, includes an explicit preference for safer alternatives and is publicly disclosed

"Beautycounter is a skin care and cosmetics company launched in 2013 with a vision to make personal care and beauty products without hazardous ingredients. In the eight years since Beautycounter, LLC was launched our team has worked to formulate high performing products that also meet the highest standards of safety in our industry. Through our

industry leading ingredient screening process and testing protocol, we avoid over 1,800 chemicals of high concern (called our Never List) while giving preference to safer alternatives.”

Beautycounter’s chemical policies are publicly available on their website.

<https://www.beautycounter.com/safety>

#### **M1.4 Packaging**

Beautycounter maintains a restricted substances list (RSL), which they call “The Never List,” for packaging. From their website,

“For decades, there’s been growing research around the health impacts of packaging, especially when it comes to plastic. Studies have shown there can be serious health risks tied to packaging products in certain potentially harmful materials. So, much like our ingredient Never List™, there are certain materials we prohibit or restrict in our packaging. BPA or plastics that contain phthalates (like vinyl) are a few of them, as they are known to leach into the products and contaminate formulas when heated.”

Beautycounter has other environmental policies for packaging that outline their packaging scorecard, recycling, refillables and sourcing.

<https://www.beautycounter.com/packaging>

#### **M1.6 Manufacturing**

Beautycounter’s chemical policy, the “Blueprint for Clean” encompasses manufacturing. From their website, Beautycounter states

“It’s not enough to only create safer products – which is why we’ve rolled out 12 safety standards that our formula and manufacturing partners must adhere to. If they won’t, it’s a hard no.”

This chemicals policy is available on their website at <https://www.beautycounter.com/safety> .

Their five step ingredient selection process, which outlines their restricted substances list, screening criteria, sourcing and transparency, is available on their website at

<https://www.beautycounter.com/transparency> .

## M1.8 Supply Chain

Suppliers sign the “Supplier Code of Conduct” and uphold the Leaping Bunny Certification. Information can be found on the website: <https://www.beautycounter.com/safety> and <https://www.beautycounter.com/responsible-sourcing> .

## M3.2 Public disclosures of CoHC in products

Beautycounter addresses chemicals of high concern via “The Never List.” From Beautycounter’s website:

“The Never List™ is made up of more than 1,800 questionable or harmful chemicals that we never use as ingredients in our products. This includes the over 1,400 chemicals banned or restricted in personal care products by the European Union, plus additional chemicals screened by Beautycounter and found to be of concern.”

“While all of our ingredients are sourced with a higher standard of safety and quality in mind, it is well recognized — and accepted by regulatory authorities around the world — that incidental, trace levels of a chemical may inadvertently be introduced in a cosmetic product due to the complexities of the supply chain and manufacturing process. At Beautycounter, we work incredibly hard to minimize — but unfortunately, can’t eliminate — the potential that a product may contain trace levels of a chemical from The Never List™.”

<https://www.beautycounter.com/the-never-list>

Beautycounter’s statement on transparency.

“Every ingredient we use in our formulations is listed on our product packaging and/or on our website—including fragrance, flavors, and preservatives. We fully disclose all fragrance ingredients—an uncommon practice in the beauty industry. We also comply with EU allergen disclosures, meaning we share some components of essential oils and natural fragrance that can be allergens for sensitive populations (not standard transparency in the secretive beauty industry).”

<https://www.beautycounter.com/en-ca/safety>

## F – Footprint Measurement

### F5.2

Beautycounter promotes safer alternatives on their website.

“Preservatives are used in personal care-products to prevent the growth of bacteria and maintain the formulas’ stability. Since this is essential, Beautycounter is dedicated to finding viable alternatives to existing preservatives using green chemistry. Our in-house chemists work tirelessly to find innovative preservation alternatives as well as to develop ground-breaking self-preserving formulas. We also serve as a founding member of the Sustainable Chemistry Alliance, a coalition of industry leaders who are working together on Capitol Hill to advance legislation that would fast-track greener and safer chemicals to the market.”

<https://www.beautycounter.com/safety>

<https://beautycounter.com/blog/our-mission/beautycounter-supports-legislation-promoting-innovation/>