



Anti-human Trafficking and Modern Slavery Statement

For Fiscal Year 2022 (March 1, 2021 – February 28, 2022)

About Helen of Troy

Helen of Troy is a global consumer products company offering creative solutions for our customers in three business segments: Housewares, Health & Home, and Beauty. Helen of Troy was incorporated as Helen of Troy Corporation in Texas in 1968 and reorganized as Helen of Troy Limited in Bermuda in 1994. Helen of Troy purchases its products from unaffiliated manufacturers, most of which are in China, Mexico and the United States. Details of our business performance and organizational structure is in our most recent 10K filing [here](#).

Our values and own operations

At a minimum, we expect our Company, our associates, our suppliers and our partners globally to comply with relevant and applicable legal and professional requirements and regulations. In addition, our Environmental, Social and Governance (ESG) [Guiding Principles](#) also outline our policies and commitments on human rights, specifically to address slavery and human trafficking risks in our operations and supply chain -such as our policies on freely chosen labor, protecting migrant workers, minority groups and women’s rights, no tolerance for child labor,. Detailed employee expectations are in our [Code of Conduct](#), while supplier expectations our outlined in our [Supplier Code of Conduct](#).

Our Board of Directors, through the [Corporate Governance Committee](#), oversees ESG-related matters and its implementation, including anti-human trafficking and modern slavery. Our ESG Director, who reports to the General Counsel, leads our ESG program, works closely with our corporate-wide ESG Task Force, and reports regularly to the Board on these matters. In fiscal 2022, we formally launched our ESG strategy, which included strengthening our human rights program particularly in our supply chain. We provide updates on our progress in our ESG Report.

Our supply chain

All of Helen of Troy suppliers must comply with local legislation and regulations and must conduct their activities in line with our Supplier Code of Conduct. We provide human rights training and awareness (including on human trafficking and slavery) to associates with direct responsibility for supply chain management, with the intent to effectively implement this statement.

Each of our suppliers has its own supply chain and we recognize that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for respecting human rights. Our focus, for the purpose of this declaration, is on our own direct suppliers, however, we encourage suppliers to share our expectations throughout their own supply chains.

In policies or agreements with third parties, Helen of Troy requires suppliers and contractors to contribute to sustainable development and to be economically, environmentally and socially responsible. Helen of Troy expects suppliers to comply with applicable laws, regulations and international standards that require them to treat workers fairly and to provide a safe and healthy work environment. All new suppliers must undergo a social compliance audit, which includes an assessment of its practices to avoid modern slavery and human trafficking.

Our Supplier Code of Conduct addresses business practices of our third-party suppliers. It contains specific provisions addressing human rights, labor, and business conduct, including verification of our product supply chain to evaluate and address risks of human trafficking and slavery aligned with our ESG Guiding Principles. Suppliers are expected to designate management staff to monitor their factories, production facilities and compliance with our Supplier Code of

Conduct. Helen of Troy may conduct announced or unannounced visits and/or have third-parties audit to ensure compliance with the Supplier Code of Conduct, including compliance with prohibitions on slavery and human trafficking.

The number of assessments follows our risk-based approach and is dependent on the level of project activity awarded throughout the year. If gaps are identified, we may work with suppliers to help them understand how to close those gaps or we may ultimately consider terminating the contract. Suppliers that are required to develop a corrective action plan may be subject to additional audits, which may be announced or unannounced, as part of Helen of Troy's monitoring efforts. In addition, contracts may be terminated with immediate effect if suppliers breach, or we suspect they are in breach, of Helen of Troy's Supplier Code of Conduct.

Disclosures

Helen of Troy is working on implementing an environmental, social and governance (ESG) reporting plan, including information related to key performance indicators on the effectiveness of the steps we have taken on these topics.

This is Helen of Troy's group statement on anti-trafficking and modern slavery for Fiscal Year 2022 (March 1, 2021-February 28, 2022) and is made pursuant to The California Transparency in Supply Chain Act of 2010 (SB 657) and section 54(1) of the UK's Modern Slavery Act of 2015.



Tessa Judge
Chief Legal Officer
Approved on behalf of the Board of Directors
Date: March 1, 2022