

**All of Helen of Troy suppliers must comply with local legislation and regulations, and must conduct their activities, including those of their relevant subcontractors and vendors, in line with this Supplier Code of Conduct.**

All suppliers are subject to environmental, social labor and human rights compliance audits, with all new suppliers being required to comply with such audits as part of the onboarding process. Suppliers are expected to designate management staff to monitor their relevant factories, production facilities, subcontractors, vendors, 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 and all applicable laws and regulations. It is expected that suppliers provide Helen of Troy and its designated third-party auditors appropriate access, transparency, and documentation to enable the successful conduct of these audits. This access, transparency, and documentation include, without limitation, (1) the disclosure by the supplier of the identity, physical location and ownership of all factories and production facilities that produce or will produce goods for Helen of Troy, (2) causing the relevant factory, facility, subcontractor and sub-tier suppliers to provide the same level of access, transparency and documentation to Helen of Troy and its designated third-party auditors as required of the supplier, including access to buildings, facilities, records, and documentation, and (3) the ability of Helen of Troy and its designated third-party auditors to interview appropriate employees of the supplier, relevant factory, facility, subcontractor and sub-tier supplier. Any proposed changes from one facility to another or the use of sub-contractors must be approved in writing by Helen of Troy before any production begins.

The number of assessments conducted by Helen of Troy follows our risk-based approach and may be 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 exercise our right to terminate 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.

We are committed to engaging relevant stakeholders in the development, implementation, and evaluation of this Supplier Code of Conduct, taking into account international standards and guidelines such as the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization's Standards.

**Promoting Ethical Conduct**

We adhere to a high standard of ethical behavior as outlined in both our Code of Conduct and ESG Guiding Principles, and expect that our suppliers do the same. Our suppliers must conduct business in a legal and ethical manner. Suppliers must comply with all applicable local and national laws and regulations of the jurisdictions in which they are doing business. Where industry practices exceed legal requirements, preference will be given to suppliers who meet such industry practices. Our suppliers are prohibited from offering or accepting bribes or kickbacks in any form directly or indirectly to or from our representatives, government officials, or any third parties.

**No Tolerance for-Child Labor**

We are opposed to all forms of child labor. Our suppliers must only employ people who (a) meet the local legal minimum age for employment; (b) meet the age for completing compulsory education in the country of manufacture; or (c) are at least 15 years old, whichever is highest. Additionally, suppliers must not expose anyone under the age of 18 to work which, by its nature of the circumstances in which it is carried out, is likely to harm their health, safety, or morals.

**Freely Chosen Labor**

All of our supplier's employees must be employed of their own volition, and by their own choice. Our suppliers must never use forced labor, whether in the form of restriction of movement, abuse of vulnerability, debt bondage, isolation, retention of identity documents, deception, abusive working & living conditions, prison labor, physical and sexual violence, excessive overtime, intimidation and threats; withholding of wage or any other form of compulsory labor.

**Proactive Non-Discrimination**

We are committed to creating a diverse and inclusive environment that welcomes and values our differences and expect our supplier partners to do the same. We expect that our suppliers hire, retain, train, promote and compensate without regard to race, color, sex, age, religion, creed, national origin, disability, genetic information, citizenship, uniform service member status, pregnancy, marital status, sexual orientation, gender expression and identity or other protected characteristics as established by law.

**Freedom of Association and Collective Bargaining**

We believe in the freedom of employees to organize as provided by law. Our suppliers must recognize and respect the right of employees to associate, organize and bargain collectively as provided by the law and do so in a peaceful manner without penalty or interference. Our suppliers must not interfere with, obstruct, or prevent or penalize such legitimate activities.

**Protecting Migrant Workers**

We forbid all forms of human trafficking and require the same of our supplier partners to assure prevention of human trafficking and ensure fair treatment of migrant workers, especially protection of the rights of those from vulnerable groups such as minorities and women. Our suppliers must have a written policy regarding their treatment of migrant workers and keep proper documentation, including, at a minimum, the requirements of fair treatment, non-retention of identity documents, the non-payment of recruitment fees, payment of transportation costs, repatriation, and any other relevant legal requirements. Our suppliers are expected to effectively communicate in migrant worker's local language its migrant worker policy to relevant employees so that they are aware of their rights.

**Preventing Harassment or Abuse**

We are opposed to any form of workplace harassment or abuse. Our suppliers must treat all employees with respect and provide work environments that are free of physical, sexual, psychological, and verbal harassment and abuse, retribution for grievances, and corporal punishment. Suppliers shall have effective, confidential grievance mechanisms, to ensure that workers can raise issues without intimidation or fear of retaliation, and with applicable legal protections.

**Fairness in Wages and Benefits**

We pay our employees fair and legal wages and require that our supplier partners do the same. Our suppliers must pay each employee at least the minimum wage required by law and applicable premium rate for overtime and must provide all legally mandated benefits. Supplier must also provide employees with a clear written accounting for every pay period and must not deduct or withhold wages or benefits for disciplinary infractions.

**Reasonable Hours of Work**

We promote humane work hours. Our suppliers must comply with applicable laws and regulations regarding work hours, including the provision of appropriate number of rest hours and days and must operate in a manner that promotes humane and productive hours of work and working conditions. A minimum of one day of rest for every seven-day period is required. In addition, all overtime must be voluntarily agreed by suppliers' employees and not excessive.

**Promoting Health and Safety**

We mandate a safe and healthy work environment and require that our supplier partners do the same. Our suppliers must provide safe work environments, complying with applicable laws and regulations regarding working conditions, including any housing and cafeteria requirements, and must provide a safe and healthy working environment to avoid work-related injuries and illnesses and promote the general health of employees.

**Environmental Responsibility**

We work toward minimizing our impact on the environment, including mitigating, and adapting to climate change, and require that our suppliers do the same. Our suppliers must comply with applicable environmental protection laws, must maintain a written environmental policy, and must implement a system to minimize or eliminate negative impacts of its practices on the environment. We work with our suppliers to reduce excessive packaging and to use recycled and low-impact materials, with the goal of on-going investigation and iterative improvement.

September 21, 2022

