



## Statement under the UK Modern Slavery Act for Fiscal Year 2019

### **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 located in China, Mexico and the United States.

### **Our values and own operations**

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 Audit Checklist. The Helen of Troy Hotline, where permissible under local laws, is available to all employees, directors and contractors, as well as our suppliers, their employees or their subcontractors. The hotline enables the reporting of noncompliance by Helen of Troy's suppliers, their employees or subcontractors. Respect for human rights and the provision of remedies for potential non-compliance are ways in which we uphold our Supplier Code of Conduct Audit Checklist.

### **Our supply chain**

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.

Our Supplier Code of Conduct Audit Checklist 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. Suppliers are expected to designate management staff to monitor their factories, production facilities and compliance with our Supplier Code of Conduct Audit Checklist. Helen of Troy may conduct announced or unannounced visits and/or have third-parties audit to ensure compliance with the Supplier Code of Conduct Audit Checklist, 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 Audit Checklist.

A handwritten signature in blue ink that reads "Tessa Judge".

Tessa Judge  
General Counsel  
Date: 2/27/2020