



The Helen of Troy Environmental, Social & Governance (ESG) Guiding Principles

About Helen of Troy

At Helen of Troy, we seek out and build world-class brands. Their meaningful positions and outstanding products elevate people's lives everywhere, every day.

We boldly bring brands into our family, where we nurture what makes them great. We collaborate internally and externally, always striving to provide the consumer-centric innovation, operational excellence, scale, global reach, and stellar shared services to make them soar.

We are proudly powered by our exceptional people, who feel and act like passionate owners. Every day, their experience and skills build superb businesses and create best-in-class capabilities in every corner of our company. We cultivate careers and celebrate our shared success as we create long-term sustainable value together.

We recognize that a thriving society and environment are key to the long-term success of any business. We are, therefore, committed to not only responding to the evolving needs of our key stakeholder groups, but also to strategically addressing our environmental and social impacts. We live our principles and embed them into how we operate our businesses and organization. It is our aim that through this work we continually earn the engagement, loyalty and pride of our consumers, associates, customers, shareholders, and the communities in which we live and operate.

Upholding these ESG Guiding Principles

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, this commitment to human rights and to environmental protection also outline the supplementary requirements we expect from ourselves, our associates, and suppliers globally. Detailed employee expectations are in our [Code of Conduct](#), while supplier expectations are outlined in our [Supplier Code of Conduct](#).

Our commitment to human rights, occupational health and safety, and to environmental protection, the regular monitoring and disclosure of our ESG performance, the provision of remedies for potential non-compliance and the conduct of supplier audits, including transparent documentation and inspections, to screen and monitor suppliers, as well as regularly reviewing our policies and commitments, are ways in which we uphold our guiding principles.

Our Board of Directors, through the [Corporate Governance Committee](#), oversees ESG-related matters and its implementation (includes environment, climate change, human rights and diversity, equity, inclusion & belonging). Our Vice President, Global ESG, who reports to the Chief Legal Officer, leads our ESG program, works closely with our corporate-wide ESG Task Force, whose members include representatives throughout our business segments and shared services, and reports regularly to the Board on these matters.

Our Commitment and Policy on Human Rights

At a minimum, we expect our Company, our associates, our suppliers, and our partners globally, including all facilities and operations, to comply with relevant and applicable legal and professional requirements and regulations on human rights and its related topics, including what is in this policy. It is our intention to implement best practices where applicable and relevant. Our Board of Directors, through the Corporate Governance Committee, oversees this policy. We provide human rights training and awareness with the intent to effectively implement this policy and commitments.

We are committed to engaging relevant stakeholders in the development, implementation, and evaluation of our policy and commitment on human rights, considering 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 Conventions 87 and 98.

The regular monitoring and disclosure of our human rights performance through our ESG Report, the provision of remedies for potential non-compliance and the conduct of supplier audits, including transparent documentation and inspections, to screen and monitor suppliers, as well as regularly reviewing this policy, are ways in which we uphold this policy and commitments.

Promoting Ethical Conduct

We adhere to a high standard of ethical behavior on all fronts and expect that our suppliers do the same. This includes mutual respect, financial discipline and integrity, as outlined in our [Code of Conduct](#).

Freely Chosen Labor

Our associates must be employed of their own volition, and by their own choice. We commit never to use forced labor, whether in the form of prison, indentured, slave, bonded or any other form of compulsory labor. We expect the same of our suppliers.

Proactive Non-Discrimination

We are committed to creating a diverse and inclusive environment that welcomes and values our differences and for our supplier partners to do the same. We 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 gender identity or other protected characteristics as established by law. We make employment-related decisions based on company needs, job requirements and our associates' qualifications, abilities, achievements, results, experiences, and conduct. We foster a work environment where everyone can engage, thrive, contribute, and grow to their fullest potential.

Freedom of Association and Collective Bargaining

We believe in the [freedom of our associates](#) to organize as provided by the law and for our supplier partners to do the same. We recognize and respect their right to associate, organize and bargain collectively as provided by the law and do so in a peaceful manner without penalty or interference. We will not interfere with, obstruct, or prevent or penalize such legitimate activities. We implement an open-door policy to encourage direct communication with our internal management.

Protecting Foreign Migrant Workers, Minority Groups and Womens' Rights

We are opposed to all forms of human trafficking and require the same of our supplier partners to assure prevention of human trafficking and ensure fair treatment of foreign migrant workers, especially protection of the rights of those from vulnerable groups such as minorities and women.

No Tolerance for Child Labor

We are opposed to all forms of child labor and require our suppliers to do the same. We 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 operation/manufacture; or (c) are at least 16 years old, whichever is higher.

Preventing Harassment or Abuse

We are opposed to any form of workplace harassment or abuse and require our suppliers to do the same. We treat all associates with respect and provide work environments that are free of physical, sexual, psychological, and verbal harassment and abuse, retribution for grievances, and corporal punishment. We 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 associates fair and legal wages and require that our supplier partners do the same. We pay each employee at least the legal wage and applicable rate for overtime and provide all legally mandated benefits. We provide associates with a clear written accounting for every pay period and do not deduct or withhold wages or benefits for disciplinary infractions.

Reasonable Hours of Work

We promote humane work hours. We comply with applicable laws and regulations regarding work hours and operate in a manner that promotes humane and productive hours of work and working conditions. We expect the same of our suppliers.

Our Commitment and Policy on Occupational Health and Safety (OHS)

At a minimum, we expect our Company, our associates, our suppliers, and our partners globally, including all facilities and operations, to comply with relevant and applicable legal and professional requirements and regulations on OHS, including what is in this policy. It is our intention to implement best practices where applicable and relevant. We provide training and awareness with the intent to effectively implement this policy and commitments.

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

The Company, starting with our senior leadership, commits to establishing a healthy and safe working environment, including the integration of health and safety into workplace activities. While we assign appropriate personnel responsible for the implementation of our OHS programs, we rely on all levels of management, as well as our associates to carry out health and safety responsibilities as outlined in our [Code of Conduct](#) and in relevant associates' job descriptions, where applicable.

We monitor the effectiveness of our OHS commitments by setting and reviewing our OHS objectives and targets on a regular basis. We acknowledge the importance of consultation and cooperation between management and associates on the effective implementation of our OHS commitments. The regular monitoring and disclosure of our OHS performance through our ESG Report, the provision of remedies for potential non-compliance and the conduct of supplier audits, including transparent documentation and inspections, to screen and monitor suppliers, as well as regularly reviewing this policy, are ways in which we uphold this policy and commitments.

Our Commitment and Policy on Environmental Protection and Responsibility

At a minimum, we expect our Company, our associates, our suppliers, and our partners globally, including all facilities and operations, to comply with relevant and applicable legal and professional requirements and regulations on environmental issues and its related topics, including what is in this policy. It is our intention to implement best practices where applicable and relevant. We provide training and awareness with the intent to effectively implement this policy and commitments.

We work toward reducing and minimizing our impact on the environment, including mitigating, and adapting to climate change, responsible waste management, energy efficiency, biodiversity protection, and natural resources management, and require that our suppliers do the same. We comply with applicable environmental protection laws and are working to implement a system to minimize or eliminate negative impacts of our practices on the environment, including reducing emissions, waste, and other environmental impacts. We work with our suppliers to reduce excessive packaging and to use recycled/recyclable and low-impact materials, with the goal of on-going investigation and iterative improvement.

The Company, starting with our senior leadership, commits to implementing environmental management systems throughout its operations, as and when relevant. While we assign appropriate personnel responsible for the implementation of these programs, we rely on all levels of management, as well as our associates to support these programs, where applicable.

We monitor the effectiveness of our environmental commitments by setting and reviewing our environmental objectives and targets on a regular basis. We are committed to engaging relevant stakeholders in the development, implementation, and evaluation of this policy and commitments. The regular monitoring and disclosure of our environmental performance through our ESG Report, the provision of remedies for potential non-compliance and the conduct of supplier audits, including transparent documentation and inspections, to screen and monitor suppliers, as well as regularly reviewing this policy, are ways in which we uphold this policy and commitments.

November 1, 2023