

California Transparency in Supply Chains Act Disclosure Statement

Helen of Troy has programs in place to effectively manage the risks of slavery and trafficking throughout our supply chain. 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 monitoring our product supply chain to evaluate and address risks of human trafficking and slavery.

To that end, we regularly ask our suppliers to self-certify their compliance with the principles in our Supplier Code of Conduct Audit Checklist. Suppliers are expected to designate management staff to monitor their factories, production facilities and compliance with our Supplier Code of Conduct Audit Checklist. In addition, 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 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. We also provide employee training regarding compliance with the Helen of Troy Code of Conduct, which includes provisions prohibiting the use of forced labor.

Finally, as part of our program, we evaluate (and may use third parties to evaluate) our supply chains for risk, including human rights and labor risks such as trafficking and slavery. We support our Supplier Code of Conduct Audit Checklist with site visits, self-assessments and third-party audits. We encourage our suppliers to focus on remediation and improvements. In the event concerns arise, we will investigate the matter and take appropriate actions to mitigate the risk by either terminating the relationship or remediating to ensure our supplier is in compliance with our Supplier Code of Conduct Audit Checklist.