



Helen of Troy Supplier Code of Conduct

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

All new suppliers must undergo environmental and social labor and human rights compliance audits. Suppliers are expected to designate management staff to monitor their factories, production facilities, subcontractors, key 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.

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.

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 on all fronts 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 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 must refrain from offering or accepting bribes or kickbacks in any form directly or indirectly to or from our representatives, government officials, or third parties in connection with us or our products.

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 prison, indentured, slave, bonded 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 for 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, and for our supplier partners to do the same. 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 Foreign Migrant Workers

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. Our suppliers are expected to have a written policy regarding their treatment of foreign migrant workers and keep proper documentation, including, at a minimum, the requirements of fair treatment, payment of employment eligibility fees, payment of transportation costs, repatriation and any requirements under country law. Our suppliers are expected to effectively communicate in migrant worker's local language its migrant worker policy to its migrant worker employees so that they are aware of their rights.

No Tolerance for-Child Labor

We are opposed to all forms of child labor and require our suppliers to do the same. 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 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. 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.

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 legal wage 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.

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.

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