



Helen of Troy Supplier Code of Conduct

Promoting Ethical Conduct

We adhere to a high standard of ethical behavior on all fronts, 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 opposed to any form of workplace discrimination, and require that our supplier partners do the same. Our suppliers must not subject any person to any discrimination in employment, including in hiring, salary, benefits, advancement, discipline, termination or retirement on the basis of race, color, sex, age, religion, creed, national origin, disability, genetic information, uniform service member status or other protected characteristics as established by law.

Freedom of Association and Collective Bargaining

We believe in the freedom of employees to associate or organize as they see fit, and require that our supplier partners do the same. Our suppliers must recognize and respect the right of employees to associate, organize and bargain collectively in a lawful and 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, they should be treated equally with that of local workers except where specified by law. 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 staunchly 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 actively promote humane work hours. Our suppliers must comply with applicable laws and regulations regarding work hours 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 actively work toward minimizing our impact on the environment, 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 actively 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.