



# SUPPLIER CODE OF CONDUCT

# TABLE OF CONTENTS

- INTRODUCTION ..... 3**
  - Doing The Right Thing ..... 3
  - Our Conduct Matters – Both Within and Outside Edgewell ..... 3
- SCOPE..... 4**
  - Edgewell Maintains Relationships with Suppliers who Share Our Values ..... 4
- COMPLIANCE WITH LAWS ..... 4**
  - Violations of the Code or Applicable Laws ..... 4
- GUIDELINES ..... 4**
  - Business Partner Training, Policies, and Codes ..... 4
  - Reporting Concerns and Questions..... 5
  - Edgewell Compliance Hotline ..... 5
  - Investigating Reports of Misconduct ..... 5
  - Zero Tolerance for Retaliation ..... 5
- ENVIRONMENTAL ..... 6**
- LABOR & HUMAN RIGHTS ..... 7**
  - Non-Discrimination ..... 7
  - Harassment and Abuse ..... 7
  - Forced Labor ..... 7
  - Child & Juvenile Labor ..... 8
  - Working Hours ..... 8
  - Wages & Benefits ..... 8
  - Freedom of Association ..... 8
  - Grievance Mechanism ..... 9
- HEALTH & SAFETY ..... 9**
  - Communication of Hazards ..... 9
  - Manufacturing Facilities..... 9
  - Dormitories ..... 10
- ETHICS ..... 10**
  - Compliance with Applicable Laws ..... 10
  - Anti-Corruption ..... 10
  - Anti-Trust ..... 11
  - Anti-Money Laundering and Counterterrorism ..... 11
  - No Conflict Minerals ..... 11
  - Accounts ..... 11
  - Securities and Insider Trading ..... 11
  - Anti-Boycott ..... 11

Import/Export .....	11
Intellectual Property and Confidentiality .....	11
Relationship Responsibility .....	12
Animal Welfare .....	12
Subcontracting .....	12
Data Privacy and Security .....	12
<b>MONITORING, CERTIFICATIONS AND AUDITING.....</b>	<b>12</b>
<b>ACKNOWLEDGEMENT &amp; ACCEPTANCE.....</b>	<b>13</b>
<b>APPENDIX.....</b>	<b>14</b>

## INTRODUCTION

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### Doing The Right Thing

These four words shape and guide how Edgewell Personal Care Company and all of its subsidiaries, divisions, affiliates, or agents (collectively referred to herein as “Edgewell”) do business every day. At Edgewell, we know that conducting business ethically and treating people with respect, dignity, and equal opportunity lie at the foundation of long-term and future success.



### Our Conduct Matters – Both Within and Outside Edgewell

Edgewell’s commitment to responsible business practices extends beyond the expectations outlined in our internal Code of Conduct - it also extends to all third parties that Edgewell does business with. We expect the business practices of our partners to reflect our own values and standards.

To ensure that our expectations are clear, we have developed a Supplier Code of Conduct (the “Code”) which details business practice standards applicable to all third parties (“Suppliers”) that produce goods for or provide materials, goods, and/or services to Edgewell. In addition, the term “Suppliers” includes Edgewell’s licensees, any facilities and/or factories engaged, directly or indirectly<sup>1</sup>, by a Supplier to produce goods for, or provide goods and/or services to, Edgewell and any third parties that produce, source, store, distribute, market and/or sell goods or services under Edgewell trademarks.

Our Code also supports our environmental, social, and governance commitments related to human rights and labor, respectful treatment and equal opportunity, anti-corruption, environmental responsibility, and our Sustainable Care 2030 strategy. The guidelines set forth here are the minimum required and suppliers are encouraged to exceed the requirement set forth in this code.

Please take the time to read the Code thoroughly, and make sure you understand Edgewell’s expectations of you as our Supplier.

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<sup>1</sup> Supplier must provide the Code to each of Supplier’s subcontractors and require their compliance with the Code, as well as their compliance with all applicable laws.



## SCOPE

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### Edgewell Maintains Relationships with Suppliers who Share Our Values

The Code is provided to, and applies to, all Edgewell Suppliers and reflects the core values held by Edgewell to conduct business in an ethical, legal, environmentally sustainable, and socially responsible manner, and sets forth the basic and minimum expectations that all Suppliers must meet in order to do business with Edgewell. Edgewell expects the highest levels of integrity from its Suppliers and considers compliance with the Code as a necessary component to that integrity. Acceptance of an Edgewell purchase order by a supplier constitutes agreement with this Code.

## COMPLIANCE WITH LAWS

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Edgewell requires each Supplier to work diligently to conduct its business in full compliance with local and domestic laws, rules, and regulations (“Laws”) and the expectations in the Code. Where local Laws differ from the expectations set out in the Code, we require suppliers to meet the higher standard. Nothing in the Code shall create any employment relationship with a Supplier’s workers or any new or additional third-party rights for a Supplier or its workers.

The Code is informed by industry practices and internationally agreed upon standards, including the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

### Violations of the Code or Applicable Laws

Suppliers must maintain direct compliance with the principles and expectations of the Code. Compliance with the Code and applicable Laws is a material condition of continued business with Edgewell.

Edgewell may pursue legal or other remedies against any Supplier who violates the Code or applicable Laws when conducting Edgewell business. In the event of non-compliant conduct, Edgewell may, in its sole discretion, require the Supplier to implement remedial measures specified by Edgewell within a defined time or impose consequences up to and including termination of the business relationship and any related contracts.

## GUIDELINES

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### Business Partner Training, Policies, and Codes

Suppliers must communicate the principles and expectations set out in the Code to their workers and business partners in a manner that is understandable to all. To meet this obligation, we expect Suppliers to develop and maintain internal training, policies, and/or codes to ensure that their workers and business

partners assisting with Edgewell business understand the principles and expectations set out in the code. Further, suppliers must provide access to the EPC Code at all supplier facilities, in a place frequented by workers and translated into the applicable languages spoken by workers, supervisors, and managers.

## Reporting Concerns and Questions

We encourage our Suppliers to contact us with any questions about the Code or ethical or legal concerns arising from their relationship with Edgewell. In addition, anyone who becomes aware of any actual or potential violation of the Code or any applicable Law by any Edgewell Supplier, or other misconduct, should immediately report such conduct to Edgewell. Suppliers, including their employees, may report any concerns, confidentially and anonymously<sup>2</sup>, to Edgewell's Compliance Hotline (managed by EthicsPoint, our external service provider). The Edgewell Compliance Hotline can be reached using the contact information below. Suppliers are expected to comply with all applicable data privacy Laws when using the hotline.

## Edgewell Compliance Hotline

- Call the EthicsPoint toll-free telephone number at 855-405-6557.
  - Country specific telephone numbers are provided in the [Edgewell Employee Code of Conduct](#) on page 12.
- Or file a report at our confidential web address: [www.edgewell.ethicspoint.com](http://www.edgewell.ethicspoint.com).
  - If you do not speak English, EthicsPoint will have translators available.
- If you need to contact the Edgewell Legal Department, please contact the Chief Legal Officer, or send an email to [LegalEPC@edgewell.com](mailto:LegalEPC@edgewell.com).

## Investigating Reports of Misconduct

All reports of potential violations of applicable Law, this Code, or Edgewell policies, by Suppliers are promptly evaluated and investigated where appropriate. Depending on the circumstances, an investigation may be conducted by Edgewell personnel and/or an independent third-party, as appropriate. All reports of potential misconduct will be handled with appropriate sensitivity and discretion. This means that information regarding an investigation will be shared with those who are necessary for an effective investigation and follow-up, or as required by applicable Law. When feasible, the individual making the report is informed when the investigation has been concluded.

## Zero Tolerance for Retaliation

Edgewell does not tolerate retaliation against anyone who raises an issue or concern in good faith or participates in an investigation, even if no evidence of misconduct is found. Thus, Suppliers must not retaliate against their workers who report in good faith possible violations of the Law or the Code to Edgewell, law enforcement, or government agencies. Further, Suppliers must not retaliate against their workers for cooperating with or participating in good faith in any investigation of actual or potential business misconduct or Code or legal violation. Retaliation against workers is a violation of the Code and may lead to termination of the business relationship with Edgewell.

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<sup>2</sup> The ability to report concerns anonymously may be restricted by the laws of certain countries.

## ENVIRONMENTAL

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Suppliers must comply with all applicable environmental Laws and must obtain, retain, and abide by all required environmental permits and registrations, and follow operational and reporting requirements of such permits. In particular, Suppliers must:

- **Prevent banned or restricted product content:** Suppliers must implement programs to ensure their products do not contain restricted, banned, or unlawfully taken or traded materials, including protected wildlife, protected plants, or illegal wood products.
- **Have an environmental management system in compliance with all applicable environmental Laws:** Suppliers must implement an environmental management system that demonstrates compliance with environmental Laws, as well as any required permits, licenses, and governmental permissions.
- **Have procedures for notifying local community authorities and appropriate environmental agencies of instances of noncompliance.**
- **Identify and manage chemicals and hazardous substances:** Suppliers must identify and manage chemicals and other materials posing a hazard if released into the environment and used in production to ensure safe handling, movement, storage, recycling, or reuse and disposal in compliance with all environmental Laws. Suppliers must work to prevent accidental or deliberate releases of hazardous materials, including wastewater and solid waste and air emissions of volatile chemicals or other substances that would violate applicable Laws or cause adverse environmental impacts on the local community:
  - **Comply with applicable labeling Laws for recycling and disposal of hazardous substances and hazardous wastes.**
  - **Manage and dispose of non-hazardous solid waste generated from operations as required by applicable Laws.**
  - **Monitor, control and, if required, treat wastewater generated from operations before discharge as required by applicable Laws.**
  - **Take appropriate precautions to prevent contamination of storm water runoff from Supplier facilities.**
- **Proactively respond to sustainability reporting requests:** Edgewell expects existing and potential Suppliers to support our reporting and traceability initiatives to comply with the Code. This includes participating and responding to our information requests regarding sustainability commitments, progress, surveys, audits, and other compliance monitoring programs – such as environmental footprint reporting, supply chain traceability and third-party verification.
- **Land rights of communities:** Suppliers must respect the rights and title to property and land of individuals, indigenous people, and local communities. All negotiations with regard to purchasing, leasing, extracting from or otherwise using property, natural resources or land, including the use of and transfers of such, must adhere to the principles of free, prior and informed consent, contract transparency and disclosure. Edgewell has zero tolerance for land grabbing.

Suppliers should be environmentally conscious and demonstrate continuous improvement concerning the recycled content of materials and products supplied to Edgewell. Suppliers should identify methods to eliminate or minimize the amount of packaging used to ship products and utilize recycled, recyclable, reusable, or returnable shipping material where feasible. Suppliers should reduce pollution and waste related to their business, including emissions to air and water and emissions of greenhouse gases. Suppliers should conserve natural resources and reduce environmental footprints by operating sustainably by reducing the

environmental impact of their operations and encouraging their suppliers and partners to do the same. To facilitate these reductions, Suppliers should adopt policies addressing energy use, management of hazardous materials, deforestation, and other waste and environmental risks relevant to their business. Suppliers are encouraged to implement the concepts of waste minimization and reduction, reuse, and recycling as to materials and products supplied to Edgewell.

## LABOR & HUMAN RIGHTS

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### Non-Discrimination

Suppliers must not discriminate against workers and other stakeholders, including customers and business partners, based on their personal characteristics or beliefs, including but not limited to race, color, gender, gender identity or expression, national origin, migrant status, ancestry, religion, age, sex, sexual orientation, political affiliation, disability, marital status, pregnancy or parental status, medically recognized disease status, veteran status, or any other self-identified or perceived association with a category protected by applicable Law. Suppliers must not discriminate in any employment practices, including employment applications, hiring, promotions, benefits, remuneration, rewards, access to training, job assignments, assessment of performance/quality of their work, discipline, and/or termination, and are encouraged to demonstrate a commitment to building and maintaining a diverse workforce.

### Harassment and Abuse

Suppliers must treat workers with respect and dignity. All forms of physical, sexual, psychological, or verbal harassment, coercion, abuse, violence, or threats are prohibited in the workplace and work-related locations. This includes, but is not limited to, transportation facilities, dormitories, toilets, vehicles, business trips, workshops, and during phone conversations. All workers must be protected from retaliation, including as related to reporting incidents of harassment and abuse.

### Forced Labor

Suppliers must not use forced labor, including prison labor, indentured labor, bonded labor, or other forms of forced labor of any kind as defined in the [ILO Forced Labor Convention \(No. 29\)](#), the [Abolition of Forced Labor Convention \(No. 105\)](#), and the [California Transparency in Supply Chains Act \(S.B. 657\)](#). This also includes adherence to the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (AUS) and all other relevant anti-forced labor legislation in Suppliers' country or country(s) of operation. Workers must not be subjected to isolation, abusive working and living conditions, excessive overtime, or withholding of wages. Suppliers must not engage in slavery or in human trafficking of any kind and must evaluate and mitigate the risks of slavery and human trafficking in their operations. Such prohibited conduct includes, but is not limited to, (i) force, threats of force, physical restraint or threats of physical restraint to a person; (ii) serious harm or threats of serious harm to a person; (iii) the abuse or threatened abuse of law or legal process; (iv) any scheme, plan or pattern intended to cause a person to believe that, if that person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; (v) any act involved in the recruitment, abduction, transport, harboring, transfer, sale or receipt of persons within national or across international borders, through force, coercion, fraud or deception, to place persons in situations of slavery or slavery-like conditions; (vi) the surrender of identify, immigration documents or valuable possessions; (vii) the imposition of unreasonable restrictions on workers' freedom of movement; (viii) the demand that any worker pay for their job or any fees and costs associated with recruitment and



obtaining employment; (ix) any requirement or threat that a person is indebted or coerced to work; and (x) any requirement or threat that a person remain in employment for any period of time against his or her will. Edgewell may require suppliers to certify that materials and services incorporated into Edgewell's products comply with the Laws regarding slavery and human trafficking of the country or countries that they are doing business.

## Child & Juvenile Labor

Suppliers must not employ workers at an age younger than 16 or the applicable minimum legal age requirement, whichever is greater, and in alignment with the [ILO Minimum Age Convention \(No 138\)](#). Suppliers must comply with all applicable child labor Laws, including those related to wages, hours worked, overtime, hazardous work and working conditions. Juvenile workers (ages 16-17) must not be allowed to work night hours, perform hazardous work, or work overtime. Suppliers must not produce goods for Edgewell with (i) the sale and trafficking of children; (ii) debt bondage and serfdom of children; (iii) forced or compulsory labor of children; or (iv) work which is likely to harm the health, safety, or morals of children. Suppliers must maintain official documentation for every worker that verifies the worker's date of birth. In those countries where official documents are not available to confirm exact date of birth, Suppliers must confirm a worker's age using an appropriate and reliable assessment method, and keep all records related to such confirmation.

## Working Hours

Supplier must not require workers to work more than the lesser of a) up to 48 regular work hours per week, plus up to 12 hours of overtime, or b) the limits on regular and overtime hours as allowed by local Law, except in extraordinary circumstances. In all cases, workers shall be provided with at least 24 consecutive hours of rest in every seven-day period. All overtime must be consensual, except when needed in order to meet short-term business demand and the supplier is party to a freely negotiated collective bargaining agreement representing a significant portion of its workforce, or in other extraordinary circumstances outside of the supplier's control, including but not limited to unexpected production peaks, accidents or emergencies. Suppliers must provide reasonable breaks to nursing mothers in alignment with applicable Laws and industry guidelines.

## Wages & Benefits

Suppliers must set wages and overtime pay, and provide benefits, in compliance with all applicable Laws. Workers must be paid at least the minimum legal wage, a wage that meets local industry standards, or the wages as stated in employment terms, whichever is greater. All wages owed to workers must be distributed in a timely manner. Suppliers must clearly convey the conditions of employment, including a copy of an employment contract to each worker in a language that is understood by the worker, and provide workers with a clear and understandable wage statement that includes days worked, wages earned per day, hours of overtime, bonuses, allowances, and a description of all deductions. While it is understood that overtime may be required, hourly wage rates for overtime must follow local Law. If no such Laws exist, Suppliers must compensate workers at a premium rate which is no less than 125% of the regular rate of pay, as recommended by ILO Conventions [No. 1](#) and [No. 30](#). Deductions from wages must not be used as a disciplinary measure, nor must any deductions from wages not provided for by national Law be permitted without the expressed permission of the worker concerned. Manual or electronic timecards must be used for hourly workers.

## Freedom of Association

Workers must be free to join associations of their own choosing. Suppliers must recognize and respect, and

must not interfere with, workers who wish to lawfully and peacefully associate, organize or bargain collectively in accordance with applicable Laws and the customs of the countries in which they are employed. The decision whether or not to do so should be made solely by the workers. Where the right to freedom of association and collective bargaining is restricted under local Law, employers must not obstruct alternative means for workers to join or form associations. Where workers are represented by a union, suppliers are required to establish a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives.

### Grievance Mechanism

Suppliers must provide a confidential, unbiased complaint mechanism for workers to report workplace grievances in accordance with local Laws and regulations and without fear of intimidation. Suppliers must not tolerate or undertake any form of retribution or retaliation against any individual who has sought advice or reported a complaint, including questionable behavior or a possible violation of the Code.

## HEALTH & SAFETY

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Suppliers must provide workers with a safe and healthy environment and prevent accidents and health injuries arising out of, linked with, or occurring in the course of work or a result of the operation of employer facilities. Suppliers must also ensure appropriate controls, safety procedures, preventative maintenance, and provision of suitable personal protective equipment (PPE), particularly where workers are exposed to hazards that may endanger their safety, including their reproductive health. Suppliers must have in place the proper processes and programs that ensure a safe and healthy environment in compliance with applicable regulatory requirements and must identify, mitigate, and eliminate hazards where possible, including worker exposure to physically demanding, highly repetitive, or forced assembly tasks. Physical guards, interlocks, and barriers should be provided and properly maintained for equipment used by workers. As part of this commitment, Suppliers must establish procedures and systems to manage, track, investigate, and report occupational injury and illness. Further, Suppliers must identify, evaluate, mitigate, and where possible, eliminate worker exposure to harmful chemical, biological, and other physical agents. Where hazards cannot be eliminated, Suppliers must provide appropriate controls such as closed systems and ventilation. In all cases, Suppliers must provide safe work procedures and appropriate PPE.

### Communication of Hazards

Suppliers must ensure that workers receive appropriate workplace health and safety information, training, and warnings. Suppliers must post Safety Data Sheets for any hazardous or toxic substances used in the workplace.

### Manufacturing Facilities

Facilities must be structurally safe, well maintained, and sufficiently lighted. There must be no obstructions in any aisles, exits or stairwells. There must be sufficient, clearly marked, and unlocked exits allowing for the orderly evacuation of workers in case of fire or other emergencies. Emergency exit routes must be prominently posted and clearly marked. Battery operated emergency lights must be placed above each exit to use in the case of emergencies. Suppliers must anticipate, identify, and assess emergency situations and events, and minimize their impact by implementing emergency plans and response procedures. Evacuation drills must be conducted at least annually. Adequate fire detection and suppression equipment must be

readily available and checked regularly. There must be sufficient supply of the appropriate first-aid supplies in each facility. Each facility must have adequate circulation and ventilation. Suppliers must provide free potable water for all workers and allow reasonable access to it throughout the workday. Suppliers must maintain, throughout work hours, reasonably clean, sanitary, and private toilet facilities in adequate numbers and must not place any unreasonable restrictions on their use. All machinery must be maintained, and safety devices must be installed where appropriate. All hazardous and combustible materials must be stored in secure and ventilated areas and disposed of in a safe and legal manner.

## Dormitories

Suppliers providing housing for workers must keep these facilities clean and safe. Living areas must meet a standard of living adequate for the health and well-being of the worker and of the worker's family in alignment with national laws, including adequate privacy (as set forth in Article 12 of the Universal Declaration of Human Rights) and security for all occupants. Suppliers must provide appropriate services and accommodation to workers in connection with pregnancy, nursing, and childcare as designated by applicable national Laws. Living space per worker in the sleeping quarters must meet both the minimum legal requirement and the local industry standard. There must be clearly marked exits on each floor, and emergency lighting must be installed in halls, stairwells and above each exit. Directions for evacuation in case of fire or other emergencies must be posted in all sleeping quarters. Hazardous and combustible materials used in the production process must not be stored in the dormitory or in buildings connected to sleeping quarters. Fire drills must be conducted at least annually. Free, potable water must be available to dormitory residents. Residents must have access to reasonably clean, sanitary, and private toilet facilities in adequate numbers.

## ETHICS

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### Compliance with Applicable Laws

Suppliers must ensure that they, their affiliates, and workers comply with all applicable Laws and regulations when conducting business for Edgewell.

### Anti-Corruption

Suppliers must comply with all applicable Laws, including those Laws governing conduct with government officials such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Suppliers must not: (i) make any offer or payment, directly or indirectly to any government official or any other person, that would constitute an illegal bribe under applicable Law, (ii) accept or request any unlawful payments or things of value or (iii) otherwise engage in any illegal or corrupt practices in order to promote or advance Edgewell's business interest or in an attempt to increase the business that Supplier has with Edgewell. Government officials include any (i) officer, employee or consultant of a government or governmental department or agency; (ii) officer or employee of a state-owned enterprise or partially state-owned enterprise, political party or official, candidate for political office; (iii) officer or employee of a public international organization, such as the World Health Organization or World Bank; (iv) any private person acting temporarily in an official capacity; or (v) the spouse or immediate family members of any of the persons mentioned above. All Edgewell payments to Suppliers must be made directly to the Supplier by an approved and preferred Edgewell payment method.

## Anti-Trust

Suppliers must not enter into agreements or take actions that unreasonably restrain trade, are deceptive or misleading, or restrict competition. Suppliers must comply with all applicable antitrust and competition Laws.

## Anti-Money Laundering and Counterterrorism

Suppliers must comply with applicable anti-money laundering and counter-terrorist financing Laws. Suppliers must scrutinize the source of funds transmitted to Edgewell. Suppliers must also conduct due diligence of customers and counterparties to avoid inadvertently facilitating money laundering or funding terrorist organizations in the course of doing business with Edgewell.

## No Conflict Minerals

Supplier undertakes that no conflict minerals (tantalum, tin, gold, tungsten, or their derivatives) are incorporated in, or necessary to, the functionality or production of any product delivered to Edgewell (including in any component manufactured of such product by a third- party) in accordance with the [Edgewell Conflict Minerals Sourcing Policy](#).

## Accounts

Suppliers must operate their business with high financial integrity and maintain accurate books and records in compliance with generally accepted accounting principles. Suppliers must not make false, inaccurate, artificial, or misleading entries or omissions in any system, book, communications, or records. Suppliers must not intentionally make a payment or approve an invoice, expense report, or other document that is incorrect, misleading, or inaccurate.

## Securities and Insider Trading

Suppliers that possess non-public information related to Edgewell must not use or share that information to trade or enable others to trade in Edgewell securities or the securities of another company to which such information pertains. Suppliers must comply with all securities and insider trading Laws when conducting Edgewell business.

## Anti-Boycott

Supplier must comply with U.S. and other applicable import/export controls, sanctions, and anti-boycott Laws when conducting business for Edgewell, and must avoid taking any actions that would cause Edgewell to violate these Laws.

## Import/Export

If Supplier is responsible for the import/export of goods, Supplier must be aware of and in compliance with all applicable Laws and must make accurate declarations and not mischaracterize the value or nature of the goods in any way that would create liability. Supplier must not transfer Edgewell goods or technologies to sanctioned/embargoed countries or territories, to sanctioned or restricted parties, or for restricted end uses unless such transfer is authorized under applicable Law or regulation and is explicitly approved, in writing and in advance, by Edgewell.

## Intellectual Property and Confidentiality

Suppliers must respect both Edgewell and third-party intellectual property rights and maintain the confidentiality of both Edgewell and third-party trade secrets and other proprietary information. Suppliers must take all actions necessary to protect Edgewell intellectual property and Edgewell brand integrity, and Suppliers accept the responsibility to hold their suppliers and subcontractors accountable as well. In

supplying products to Edgewell, Suppliers must not violate or infringe any third-party patents and must take appropriate action to ensure that Edgewell will not receive any infringing products. Confidential and proprietary information includes any information that is non-public or not easily determined or obtained by others. Suppliers must not use Edgewell's name or trademarks in any advertising or marketing materials without prior written authorization from Edgewell.

### Relationship Responsibility

Suppliers must be sensitive to Edgewell Teammates' internal codes of conduct and avoid conflicts of interest. A conflict of interest occurs when someone's personal interests influence or appear to influence their ability to act objectively and in the best interests of Edgewell. Suppliers must disclose to Edgewell any actual or potential conflicts of interest. Suppliers must inform Edgewell if one of their workers, investors, family members or other affiliated persons has a relationship with an Edgewell employee who can make decisions that may affect the Supplier's business, or if an Edgewell employee has an interest of any kind in Supplier's organization.

Additionally, Edgewell Teammates cannot solicit any gifts from Suppliers, nor can an Edgewell Teammate accept any gifts or entertainment if such could influence, or appear to influence, the Edgewell Teammate's business decisions on behalf of the Supplier or interfere with the Edgewell Teammate's ability to be impartial in carrying out his or her duties. Copies of these policies can be provided upon request.

### Animal Welfare

Suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals and provide an environment free from distress, cruelty, abuse, and neglect that is consistent with all applicable Laws and industry guidelines and based on best available technology and standards, and in accordance with the [Edgewell Animal Testing Policy](#).

### Subcontracting

Suppliers must not use subcontractors without prior written approval from Edgewell. In general, Suppliers and Subcontractors must compete fairly and ethically for all business opportunities and must comply with all applicable Laws and the Code.

### Data Privacy and Security

Suppliers must ensure that they, their affiliates, and their workers comply with all applicable Laws and regulations concerning the collection, use and protection of personal information when conducting business for Edgewell. Personal information includes information that relates to an identifiable individual. Suppliers must take appropriate steps to safeguard confidentiality and privacy of personal information of individuals. Suppliers must not access, use, or disclose personal information in a manner that is not compatible with the context in which the personal information was obtained by or on behalf of Edgewell, or otherwise not aligned with Edgewell's expectations based on the business relationship with Edgewell.

## MONITORING, CERTIFICATIONS AND AUDITING

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Suppliers are expected to designate one or more members of management staff to be responsible for assessing and monitoring its compliance with the Code. From time to time, and consistent with our Suppliers' obligation to comply with the Code, Edgewell may ask Suppliers to execute certifications of their compliance with the principles in the Code.

To manage risk in the supply chain, we use various third-party audit criteria to help evaluate Suppliers' overall compliance in areas such as, quality, safety, and environmental compliance.

From time to time, Edgewell or an independent third-party may evaluate Suppliers' compliance in areas relevant to the Code, such as financial books and records, quality, safety, and environmental compliance. Suppliers must allow Edgewell and/or any of its representatives or agents (including third parties) access to its facilities, relevant records, employees for confidential interviews, and other sources for evaluation of compliance with the Code, whether announced or unannounced. Suppliers agree to maintain on file such documentation as may be needed to demonstrate compliance with the standards mentioned above and agree to make these documents available for Edgewell or its representatives for inspection.

Edgewell will continue to develop monitoring systems to assess compliance. Compliance with the following internationally recognized alternative standards, however, will assure minimum standards are met for the listed aspects of Edgewell's Code.

- Social Accountability 8000 (SA 8000) – Labor & Human Rights Section of the Code
- United Nations Supplier Code of Conduct – Labor & Human Rights Section and Health & Safety Section of the Code
- Responsible Business Alliance (RBA) Code of Conduct – all sections of the Code, except No Conflict Minerals

If Edgewell determines that any Supplier has violated the Code, Edgewell may either terminate its business relationship or require Supplier to implement a corrective action plan. Suppliers must submit a corrective action plan that includes a time frame for correcting the non-compliances identified. If corrective action is advised but not taken, Edgewell will suspend placement of future orders and may terminate current production. Suppliers must notify Edgewell immediately if they become aware of any non-compliance of their company or of any of their suppliers with the Code, and Suppliers will take immediate necessary actions to remedy any non-compliance.

## **ACKNOWLEDGEMENT & ACCEPTANCE**

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By acceptance of Purchase Order or payment from Edgewell, Supplier acknowledges acceptance of this Code of Conduct and intention to comply with its requirements.

## APPENDIX

### Code of Conduct Reporting

Reports of potential misconduct can be made directly to your manager, Human Resources to any attorney in the Legal Department, or by anonymously contacting the Compliance Hotline



#### Telephone Numbers:

United States & Canada: 1-855-405-6557

The following countries have local direct dial numbers for the Hotline:

China	4008801412
Czech Republic	800-144-074
France	0800-90-6951
Israel	180-931-7156
México	001-855-903-8164
United Kingdom	0808-234-6250

**Two-step toll-free dialing is used for these countries:**

Australia - Optus	Step #1: 1-800-881-011
Australia - Telstra	Step #2: 855-405-6557
Chile	Step #1: 800-225-288
Colombia	Step #2: 855-405-6557
Germany	Step #1: 01-800-911-0011
Hong Kong	Step #2: 855-405-6557
Italy	Step #1: 0-800-225-5288
Japan	Step #2: 855-405-6557
Peru	Step #1: 800-93-2266
Poland	Step #2: 855-405-6557
Russia	Step #1: 0034-811-001
Spain	Step #2: 855-405-6557
Venezuela	Step #1: 800-172-444
New Zealand	Step #2: 855-405-6557

Teamates calling from all other countries should consult [www.edgewell.ethicspoint.com](http://www.edgewell.ethicspoint.com) for additional dialing information and instructions.