



## **Edgewell Personal Care Company**

### *UK Modern Slavery Act and Australian Modern Slavery Act Statement*

Edgewell Personal Care Company and its subsidiaries (collectively "Edgewell") believe in complying fully with all applicable laws and regulations affecting our businesses. We expect that our employees and business partners will always adhere to the highest ethical business practices. This slavery and human trafficking statement is made by Edgewell pursuant to section 54 of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (collectively the "Acts"), for the financial year ending 30 September 2023, and sets out the steps taken by Edgewell to ensure that slavery and human trafficking are not present in our business or direct supply chain.

#### **About Edgewell**

Edgewell Personal Care Company is a U.S. corporation that is listed on the New York Stock Exchange. Edgewell has a number of subsidiaries throughout North America and Canada, Latin America, Europe, the Middle East, and the Asia Pacific regions. Those subsidiaries include, for purposes relevant to the Acts: Bulldog Skincare Holdings Limited (UK); Bulldog Skincare Limited (UK); Edgewell Personal Care Investments UK Ltd. (UK); Edgewell Personal Care Holdings UK Company Ltd. (UK); Edgewell Personal Care UK Limited (UK); Wilkinson Sword Limited (UK); Edgewell Personal Care Australia Pty. Ltd. (AUS); and American Safety Razor Australia Pty. Limited (AUS). This statement is a collaborative effort between Edgewell's global Procurement, Supply Chain, Legal and HR functions, based largely in the U.S., and the relevant local subsidiaries covered by the Acts.

Edgewell is one of the world's largest manufacturers and marketers of personal care products in the wet shave, sun and skin care (including grooming products), and feminine care categories. Edgewell operates in more than 20 countries with extensive retail reach across 50+ markets, and Edgewell employs approximately 6,800 teammates globally. In addition to its various corporate and commercial offices, Edgewell operates 11 manufacturing and/or warehousing facilities across the globe, including in the United States, Canada, Mexico, Germany, Czech Republic, and in China. Edgewell is committed to responsibly sourcing the ingredients and materials that we use to produce and package our products everywhere we do business.

Edgewell manages our business in three operating segments: Wet Shave, Sun and Skin Care, and Feminine Care. With respect to Wet Shave, Edgewell manufactures and distributes both branded and private label razor systems and disposable shave products around the world, though our primary markets for Wet Shave are the United States, Canada, Japan, Germany, France and the U.K. Edgewell also sells shave preparation products, e.g., shaving gels and creams, in the U.S., Canada and Japan.



Edgewell manufactures and distributes Sun and Skin Care protection products under multiple brand names primarily in the United States, Mexico, Australia and Canada — with efforts to expand distribution further across the world. Edgewell also has acquired a portfolio of men’s grooming skin care brands that are sold in the United States and across Europe.

Finally, in the Feminine Care space, Edgewell manufactures and distributes tampons, pads and liners under various brand names throughout North America.

Edgewell markets and sells our products primarily through a direct sales force, supplemented by strategic exclusive and non-exclusive distributors and wholesalers in certain markets. In the United States, Japan, and larger markets in Western Europe and Latin America, we have dedicated commercial organizations. In other countries where our presence is smaller, we utilize third-party distributors and wholesalers for the marketing, distribution and sales of our products.

A more complete description of Edgewell’s structure, values, divisions, specific product brands, and other details around Edgewell’s business generally can be found in our Annual Report on Form 10-K filed with the United States Securities and Exchange Commission on 28 November 2023, which can be found on the Investor Relations section at [www.edgewell.com](http://www.edgewell.com), and also in our annual Sustainability Report, which can be found in the Sustainability section of our website.

## Applicable Policies

### Edgewell Personal Care Code of Conduct

We believe our Purpose, Values and Behaviors (“PVBs”) reflect the high ethical standards that we uphold throughout our business, and our PVBs are embedded into our Edgewell Personal Care Code of Conduct (the “EPC Code”). Our values, **“People First”**, **“Own it, Together”**, **“Listen Up and Speak Up”** and **“Move Forward,”** are foundational to our purpose and govern our collaborations with our colleagues, our partnerships with our customers, and our connection to our consumers.

The *Human Rights* section of the EPC Code makes clear that Edgewell prohibits the use of forced or otherwise illegal labor and human trafficking, and that Edgewell does not condone the exploitation, physical punishment, abuse, trafficking or involuntary servitude of anyone. Edgewell further requires all of its business partners to exhibit respect for these fundamental human rights and human dignity when doing business with us. In short, the EPC Code makes clear that we hold our suppliers to the same standards as that to which we hold ourselves.

### Human Rights Policy

In addition to the Human Rights provision in the EPC Code, Edgewell recently adopted a more comprehensive Human Rights Policy as part of its Sustainable Care 2030 strategy,



<https://edgewell.com/pages/policies-statements>. In the Human Rights Policy, Edgewell has committed to respecting the key values and principles found in internationally recognized human rights standards, such as:

- The International Bill of Human Rights, which includes the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social, and Cultural Rights (ICESCR);
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises;
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work; and
- The United Nations (UN) Guiding Principles on Business and Human Rights.

Edgewell has committed to embed the principles in the Human Rights Policy into both our own operations and across our supply chain and has made clear that both child labor and forced labor are among the highest priority human rights issues.

### **Supplier Code of Conduct**

Edgewell has specifically taken the key values and principles in its Human Rights Policy and ensured that all of Edgewell's suppliers also conduct themselves to the same standards. This is the core purpose of Edgewell's Supplier Code of Conduct (the "Supplier Code"), <https://edgewell.com/pages/policies-statements>, also recently implemented as part of Edgewell's Sustainable Care 2030 strategy. Edgewell provides the Supplier Code to all of our suppliers and makes clear that acceptance of an Edgewell purchase order constitutes a promise to comply with the Supplier Code.

The Supplier Code contains an in-depth section on Labor & Human Rights, including a section prohibiting Forced Labor. The Forced Labor section of the Supplier Code explicitly states:

[Edgewell] 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 countries 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.



The Forced Labor section of the Supplier Code further puts suppliers on notice that, as noted above, accepting an Edgewell purchase order constitutes a certification of compliance at the outset of the relationship or transaction, and a promise to comply with the Supplier Code during the contract period. Edgewell also may require suppliers to certify periodically in the future that materials and services incorporated into Edgewell’s products comply with the laws regarding slavery and human trafficking of the country or the countries where they are doing business. Edgewell further makes clear to suppliers that they are responsible to assess and monitor their own compliance with the Supplier Code — and that Edgewell may also ask suppliers to execute certifications of their compliance with it. Finally, if Edgewell determines that any supplier has violated the Supplier Code, Edgewell may terminate the relationship altogether or require the supplier to implement a corrective action plan.

As the foregoing policies make clear, Edgewell is committed to ensuring that there is no modern slavery or human trafficking in any of our operations globally. Edgewell strives to promote sustainable business practices across our entire value chain and to embed respect for human rights and zero tolerance of modern slavery across our business. As an extension of our core business, we expect our suppliers to share the same values and ethical standards that we demand of ourselves.

As part of our responsible sourcing program, Edgewell may, where appropriate, apply enhanced due diligence on parts of our supply chain related to certain environmental or social issues, including in jurisdictions in which our suppliers are located that are identified as high-risk for modern slavery.

### **Reporting and Investigating Concerns; Non-Retaliation**

Edgewell has a robust Ethics and Compliance program to help ensure that all of these standards are met. The EPC Code, the Human Rights Policy, and the Supplier Code all make clear that Edgewell will investigate all reports of potential violations in a timely, objective and respectful manner, and without retaliation. Edgewell employees as well as suppliers and their employees may report any concerns confidentially through Edgewell’s third-party Compliance Hotline, EthicsPoint — including anonymously where permitted by applicable law. Edgewell will handle all such matters with the appropriate sensitivity and discretion. Edgewell also does not tolerate retaliation against anyone who raises a concern in good faith or participates in an investigation, even if no evidence of misconduct is found. Thus, if suppliers retaliate against their workers who in good faith report potential violations of the law, the EPC Code, the Human Rights Policy, the Supplier Code, or any other policy, it may lead to terminate of the supplier’s business relationship with Edgewell.

### **Supply Chain Due Diligence**

Our key suppliers have each represented and warranted, by virtue of doing business with Edgewell, that they agree to comply with the Supplier Code. As noted above, this means that



all such suppliers are promising to comply with all slavery and human trafficking laws of the country or countries in which they do business, including but not limited to the Acts, and that they do not engage in slavery or in human trafficking of any kind, including but not limited to the recruitment, harboring, transportation, solicitation, provision or acquisition of persons for labor or services through the use of force, fraud or coercion.

During fiscal year 2023, we did not identify any instances of human trafficking or modern slavery in our direct supply chain.

### **Areas of Risk**

Edgewell recognizes that the third-party distributors and wholesalers it uses potentially have increased risk of slavery and human trafficking when compared to Edgewell's directly employed manufacturing and commercial employees.

Another potentially increased area of risk regarding slavery and human trafficking in Edgewell's supply chain arises from the sourcing and availability of raw materials. Edgewell sources materials such as steel, various plastic resins, plastic based components, textile fibers and non-woven fabrics, organic and inorganic chemicals, soap-based lubricants and plastic-pulp based packaging in the manufacturing of our products. These materials are sourced on a regional and/or global basis, as applicable, and from multiple sources as price and availability fluctuates.

### **Evaluation of Risk**

Edgewell carries out routine due diligence checks on material suppliers and routinely screens third parties, including suppliers, against compliance information databases that include human trafficking and modern slavery information. Due diligence and monitoring is ongoing and under review to improve supplier vetting and to further minimize a range of risks around human rights, including modern slavery and human trafficking. This is led by our procurement team, assisted by our legal team. Our procurement team also looks to foster long-term relationships with suppliers, through which policies aimed at minimizing a range of risks (including the risk of modern slavery and human trafficking) can be advanced. Edgewell reserves the right to terminate relationships with suppliers who do not conform to the requirements of applicable law and our EPC Code.

### **Training**

We will continue to work to embed respect for human rights and zero tolerance of modern slavery across our business; to strengthen the education available to our employees and business partners on the risks, policies and standards related to modern slavery, human trafficking and forced labor; and to develop awareness-raising tools for our company and our direct supply chain. The Supplier Code makes clear Edgewell's expectation that suppliers develop and maintain internal training, policies and/or codes to ensure that their workers and



business partners assisting with Edgewell business understand these principles. Further, Edgewell also includes content on Protecting and Respecting Human Rights in its annual training on the EPC Code for Edgewell employees.

### Approval

This statement has been approved by the board of directors (or equivalent management body) of each of the entities named below, including but not limited to for the purposes of complying with the Acts, and signed by a director (or equivalent) of each of these entities effective 31 March 2024. This statement constitutes the requisite annual "Modern Slavery Statement" for the fiscal year ending 30 September 2023.


#### Bulldog Skincare Holdings Limited

  
By: LaTanya Langley, Director

#### Bulldog Skincare Limited

  
By: LaTanya Langley, Director


#### Edgewell Personal Care Holdings UK Ltd.

  
By: LaTanya Langley, Director

#### Edgewell Personal Care UK Limited

  
By: LaTanya Langley, Director

#### Edgewell Personal Care Investments UK Ltd.

  
By: LaTanya Langley, Director

#### Wilkinson Sword Limited

  
By: LaTanya Langley, Director

#### Edgewell Personal Care Australia Pty. Ltd.

  
By: LaTanya Langley, Director

#### American Safety Razor Australia Pty. Limited

  
By: LaTanya Langley, Director