



Responsible Palm Oil Sourcing Policy

Introduction

Palm oil supports the livelihoods of farmers globally, contributes to economic development, and because of its versatility and efficiency, is a key ingredient in a variety of consumable products, including personal care products. Palm uses up to ten times less land while producing a much higher oil yield than equivalent edible oils. However, palm oil plantations have expanded in recent decades to meet growing global demand, raising concerns about how palm oil is cultivated and its correlation to deforestation of carbon-rich forests. While the amount of palm oil, palm oil derivatives, palm kernel oil, and palm kernel oil derivatives ingredients (“palm oil”) used in the manufacturing of Edgewell Personal Care products is small, the company is committed to the responsible sourcing of sustainable palm oil. Edgewell joined the Roundtable on Sustainable Palm Oil (RSPO) in 2022 to further advance our efforts and demonstrate our commitment to use responsibly source palm oil.

Policy

This policy complements Edgewell’s [Supplier Code of Conduct](#) and [Human Rights Policy](#).

Our Responsible Palm Oil Sourcing Policy covers our end-to-end supply chain, including direct suppliers, distributors, as well as third party contract manufacturers. It applies to all palm oil sourced by Edgewell, our subsidiaries, and contract manufacturers. We expect our suppliers to meet and communicate these expectations with their supply base, while ensuring proper due diligence and monitoring practices are in place.

Our Commitment

Edgewell is committed to sourcing 100% of palm oil utilized to produce our products from certified sources, Mass Balance as a minimum. Edgewell employs a multifaceted approach to meet this objective including the purchase of RSPO certified palm oil, creation of robust sourcing practices, and dissemination of expectations within our Supplier Code of Conduct. While the priority is to physically source certified material, we will consider RSPO Credits in specific instances where certified palm oil materials are not available.

Edgewell Expectations

The RSPO certification demonstrates that RSPO members who produce or physically handle the RSPO Certified Sustainable Palm Oil (CSPO) have committed to being part of the solution for sustainably sourced palm oil. We require our palm oil ingredient suppliers and contract manufacturers who use palm oil to source RSPO certified palm oil with valid certificates¹. Additionally, we strongly encourage those suppliers, contract manufacturers and their upstream supply chains to be RSPO members with Supply Chain Certification.

In addition to compliance with all applicable local, state, and national laws and regulations including international human and labor rights laws and norms, Edgewell suppliers are expected to meet and communicate the following expectations throughout their supply chains:

¹ Edgewell recognizes the challenge for some palm oil derivatives to be RSPO certified due to limited transparency within the supply chain and will review ingredient on a case-by-case basis.



- No Deforestation, including protection and conservation of High Conservation Value (HCV) and High Carbon Stock (HCS) forests.²
- No new development on peat lands, regardless of depth.
- No use of fire to clear land for new development or replanting.
- No exploitation of people; which includes prohibiting and elimination of all forms of forced labor, child labor and human trafficking, including, but not limited to, any form of prison, slave, bonded or forced indentured labor.
- Respect and uphold human rights including respect for land tenure rights of indigenous people and local communities to give or withhold their free, prior, and informed consent (FPIC) in all engagement for development of land they own legally, communally or by customary rights.
- Progressive reduction of Greenhouse Gas Emissions from operations of ingredient manufacturing sites, refineries, mills, and plantations.
- Have a responsive and effective grievance mechanism that permits workers impacted by supply chain operations to report concerns and violations confidentially and anonymously without fear of retaliation.
- Comply with Edgewell’s [Supplier Code of Conduct](#).

Supply Chain Disruptions

Supply disruptions can occur within a company’s supply chain due to geopolitical and environmental events. Such events could restrict Edgewell’s ability to procure an ample supply of RSPO certified palm oil to meet production demand. We also recognize the challenge for some palm oil-derived ingredients to be RSPO certified due to limited transparency within the supply chain. In such a case, we expect our suppliers to be transparent and forthcoming regarding supply disruptions requiring the use of non-certified palm oil. Edgewell will review requests for exceptions on a case-by-case basis.

Tracking and Reporting

We work with our suppliers and external partners (where applicable) to collect, aggregate, and communicate information about our progress in sourcing 100% certified sustainable palm oil for use in our products. Edgewell reports the amount of palm oil sourced in the Company’s Sustainability Report, including the percentage of RSPO certified palm oil. We expect each supplier to comply with Edgewell’s request as it pertains to material certification or general usage inquiries for reporting purposes.

² [The High Carbon Stock approach \(“HCSA”\) Toolkit](#) should be applied to identify and conserve HCS forest. These provisions prohibit the conversion of Intact Forest Landscapes (defined by the IFL Mapping Team) for Oil Palm Production.