



Edgewell Human Rights Policy

Introduction

At Edgewell Personal Care Company and our subsidiaries (collectively, "Edgewell"), we are committed to conducting business responsibly and complying fully with all applicable laws and regulations affecting our businesses. We are equally committed to advancing in our journey to use our business and our brands as catalysts for good. Our Sustainable Care 2030 strategy sets out our ambition to help build a world in which caring for ourselves is balanced with caring for our shared planet and society.

Providing a fair and inclusive work environment is incredibly important to us. As such in applying our Human Rights Policy, we are focused on upholding and promoting the rights of all people. We listen deeply and speak directly to create an environment that is open to difference. We aim to bring joy to not only the products we create and the people we serve, but our teammates across the globe too.

Our Purpose, Values, and Behaviors reflect the high ethical standards that we uphold throughout our business. Our [values](#) are foundational to our purpose and govern our collaborations with our teammates, our partnerships with our customers, and our connection to our consumers.

Scope of This Policy

In this Human Rights Policy (the "Policy"), we commit 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);
- OECD Guidelines for Multinational Enterprises;
- The ILO Declaration on Fundamental Principles and Rights at Work; and
- The UN Guiding Principles on Business and Human Rights.

We will embed the commitments that we make in this Policy into both our own operations and across our supply chain. We also expect our teammates, suppliers, and other business partners to uphold such commitments and to act in compliance with domestic law and international human rights standards wherever they operate.

Where domestic laws and international human rights standards differ, we commit to upholding whichever standard is higher to the greatest extent feasible, and we ask our business partners to do the same.

This Policy is publicly available on our website and is shared with all team members and with business partners, as a condition of employment or doing business with Edgewell. It applies to both the conduct of and respect of rights for the following stakeholders: Edgewell teammates across our global operations — from our offices to manufacturing sites — suppliers and supply chain workers, contractors and service providers, communities that host our manufacturing sites or sourcing locations, and consumers.

We are aware of the different human rights impacts on groups or individuals who have been historically underrepresented. We take an intersectional approach in applying our policies by recognizing that each individual is unique.

Prioritized Human Rights Issues

To determine the most salient human rights issues — based on our industry and business activities — for our own operations and across our supply chain, we worked with a recognized third-party expert to complete a formal salient issue identification exercise. From the exercise, we identified the following issues related to our industry (in alphabetical order) as posing the most severe risks to people and will therefore prioritize actions to address identified and related adverse human rights impacts.

1. Child Labor;
2. Discrimination, Harassment and Abuse;
3. Forced Labor;
4. Labor Conditions;
5. Occupational Health and Safety; and
6. Product Stewardship and Safety.

We will continually assess these and other risks and emerging issues and will report on our actions and potential changes to our salient human rights issues in our annual Sustainability Report.

Governance

This Policy has been approved by the Chief Executive Officer of the Company and reviewed by the Corporate Governance Committee (CGC) of the Board of Directors. The CGC has oversight for the Company's human rights practices and is informed of any substantive changes to this Policy.

Implementation

Our commitment to human rights is embedded in roles and responsibilities throughout the organization. Business leaders from departments such as Human Resources, Legal, Procurement, Operations, and Sustainability are responsible for ensuring alignment between our commitment and our policies, practices, and procedures in their respective areas. Our cross-functional Working Group, consisting of various business leaders, will allow us to ensure alignment between departments, implement targeted human rights programs and initiatives, and inform our reporting. To further ensure internal alignment with our Policy commitments, we will ensure the topic of human rights is included in our annual Code of Conduct training.

We recognize that our potential human rights impacts go beyond our own operations into our supply chain. As such we are continually reviewing and improving our ethical and responsible sourcing program to ensure alignment with our Human Rights Policy within their own business activities and supply chains. We require that our business partners comply with our [Supplier Code of Conduct](#), and expect they cascade the commitment to respect human rights to other business relationships throughout their supply chains. We will conduct joint activities with suppliers to support them in implementing and cascading these expectations.

In accordance with the principles of the United Nations Guiding Principles (UNGPs), we are committed to conducting formal human rights due diligence, which includes:

- Assessing human rights in our own business and across our supply chain;
- Integrating human rights issues identified into management decisions and actions;
- Preventing, mitigating and managing human rights risks;
- Reviewing the effectiveness of our processes;
- Tracking our actions and progress to inform decision-making and effective remediation; and
- Engaging with, and reporting to, internal and external stakeholders.

Collaboration and Engagement

We know that we cannot do this work alone and we are committed to engaging with stakeholders, including potentially affected rightsholders, to inform the rollout and implementation of this Policy. We also expect our business partners to identify human rights risks, prevent abuses, and mitigate harms when they occur. Additionally, we remain committed to supporting our retail customers' human rights ambitions and interests and will continue to seek alignment where possible.

It is important that we are transparent as we continue our human rights journey. We will provide more insight into our strategies to manage identified risks and implement relevant programs related to human rights in both our operations and supply chain in our annual Sustainability Report. We will also use our [website](#) to publish documentation related to human rights, such as updated policies.

Grievance Mechanisms

Grievance mechanisms are important to identify human rights violations and provide a mechanism for individuals to report potential misconduct. We are committed to ensuring alignment with the UNGP's criteria for effective grievance mechanisms.

We provide team members and business partners with access to a confidential phone number and web address, via the toll-free number (+1) 855-405-6557 and at third-party managed website www.edgewell.ethicspoint.com (available in multiple languages). Our [Code of Conduct](#) emphasizes the importance of raising concerns and provides steps on how to report such concerns. Our [Supplier Code of Conduct](#) also includes Hotline contact information and requires business partners to cascade the requirement for a grievance mechanism in turn to their business partners.

All grievances are processed by the Chief Legal Officer and/or responsible members of the Edgewell Legal Team. We will not tolerate any form of retaliation for reporting grievances.