



Code of Conduct



DOING THE RIGHT THING

A Message from Rod Little

Chief Executive Officer



Edgewell Personal Care Company believes in complying fully with all applicable laws and regulations affecting its businesses. We expect that our Teammates will always adhere to the highest ethical business practices. This document reaffirms this commitment. Please read it carefully and use it to help guide your conduct.

As individual Teammates, we must not only abide by the appropriate standards, but should take the steps necessary to ensure that the Company complies. No one can justify an illegal or unethical act. Any excuse that any such action was "for the good of the Company" will not be accepted. We want each of you to exercise sound judgment and always set an example of a high standard of business ethics.

As a global company, developing and managing a strong diverse organization is essential to achieving our business purpose and objectives. Therefore, we regard our Teammates as the Company's most valuable assets. For that reason, this document covers our policies to ensure a safe workplace environment which is free from unlawful discrimination. We also cover various other topics, ranging from compliance with applicable laws and good business practices to providing the highest quality products to our customers.

If you have any questions about this information, you should talk with your supervisor, an attorney in the Legal Department, or Internal Audit. If you encounter any situation which raises concerns about questionable accounting or auditing matters, you should call the confidential telephone number listed in this document. If you encounter any other situation which you believe violates the standards of conduct outlined in this document, you may immediately consult your supervisor, another member of management at your facility, or as otherwise directed in the relevant section of the Code, as an alternative to using the confidential phone or internet options provided. You may also call the confidential telephone number listed in this document concerning those matters. When done in good faith, you have my assurance that there will be no retribution for asking questions or raising concerns about compliance with these standards or reporting possible improper conduct. Integrity is your responsibility — and it is in the Company's best interest.

Rod Little
President and Chief Executive Officer

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Why We Have a Code

Integrity: The Foundation of the Edgewell Ethics and Compliance Program

Personal integrity, practiced on a daily basis, is the foundation of corporate integrity. Our ethical and legal standards of conduct are rooted in our Code of Conduct (“Code”). The Code defines what we can expect from each other and guides how we report and handle alleged violations of these standards.

Each of us is personally responsible for supporting our Purpose, Values and Behaviors (PVB) through our Ethics and Compliance Program, which is intended to demonstrate, in the clearest possible terms, the absolute commitment of the Company to the highest standards of ethics and legal compliance. The Program is designed to prevent and detect misconduct by Teammates of the Company, its subsidiaries, and affiliates, and to ensure that corporate activities are conducted in accordance with all applicable criminal and civil laws, rules, and regulations. This Code represents a major component of our Ethics and Compliance Program as it provides officers, directors, and Teammates with guidance to help understand how to behave ethically and Do the Right Thing when acting on the Company’s behalf.

Our Code sets forth the fundamental principles and some of the key policies and procedures that govern our business. It is not a complete compilation of all company guidelines or policies. We are expected to know and comply with all company guidelines and policies, whether or not reflected in the Code.

Our Code applies to us all. We are all expected to act with uncompromising honesty and integrity at all times. We must demand of ourselves and of each other the highest standards of individual and corporate integrity. Each of us, including our Chief Executive Officer and other executive officers, directors, and Teammates of Edgewell, together with our affiliate and subsidiary companies worldwide (collectively “Edgewell”), is required to strictly abide by our Code, our policies and applicable laws that apply to business activities on behalf of Edgewell.

Additionally, we have a Supplier Code of Conduct that outlines standards for and expectations of our suppliers (including any third parties that produce goods for, or provide goods and services to Edgewell). We expect our business partners to demonstrate high standards of ethical business conduct.

As an integral part of our continuing efforts to maintain very high standards of conduct, and because of the important role that each Teammate plays in our Ethics and Compliance Program, occasionally Teammates will be asked to participate in mandatory compliance training. The training may cover key components of our Code and other relevant compliance topics related to Edgewell. Managers are expected to have regular discussions about our Code and encourage everyone under their supervision to comply with our Code, Edgewell policies, and mandatory training. Our Code is also publicly available.

The Legal Department and Internal Audit help administer and monitor the Company’s Ethics and Compliance Program. You may contact the Legal Department or Internal Audit for interpretations, guidance and to ask questions concerning anything contained in this document.



Ethical Role Models: Leaders' and Managers' Responsibilities

Leaders and managers are expected to serve as ethical role models for everyone by exemplifying the Edgewell PVB at all times. If you are an Edgewell leader or manager, you have a special responsibility to lead with integrity and take affirmative steps to influence your Teammates to do the same. This requires a visible commitment to promote ethical conduct and communicate the importance of our Code.

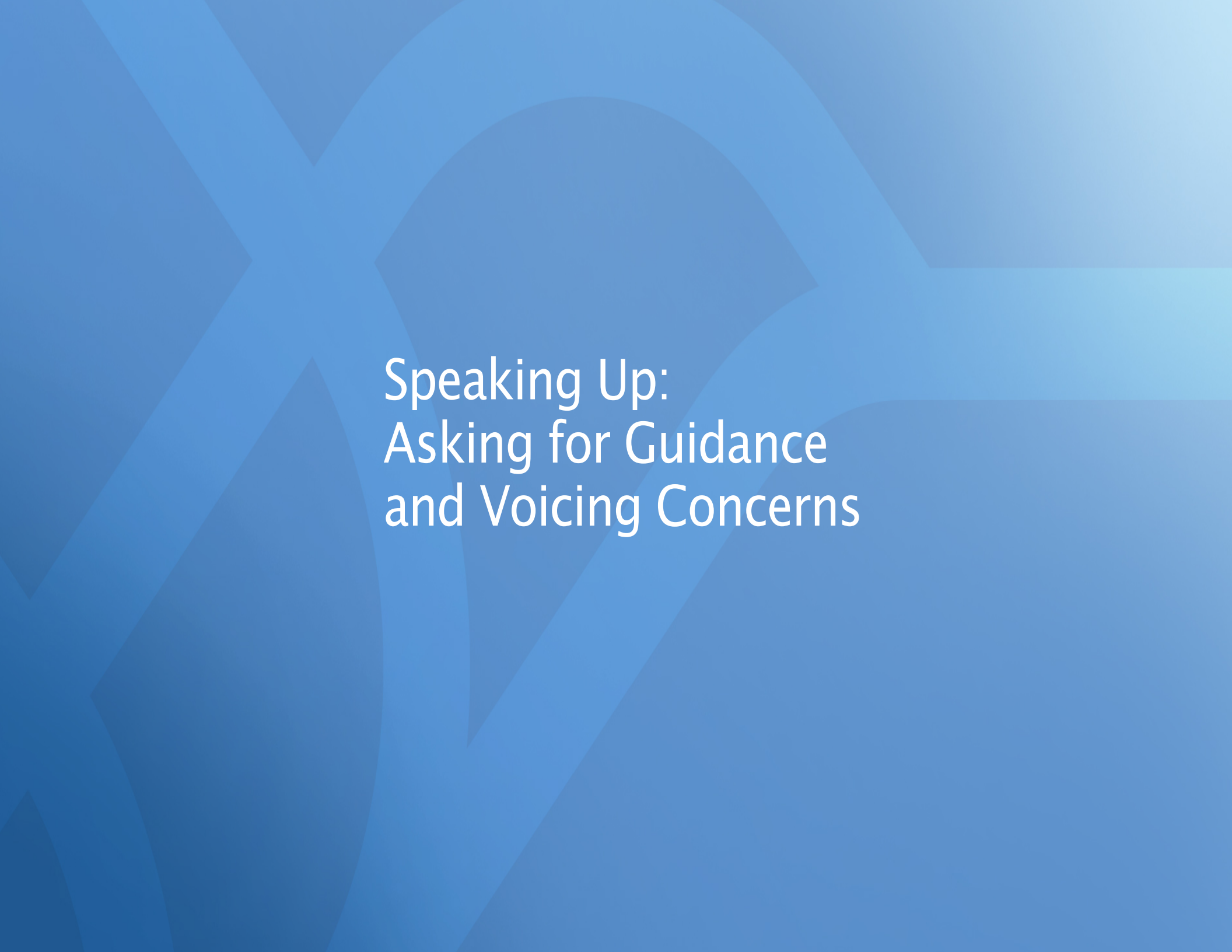
Leaders and managers must strive to create a positive work environment in which everyone feels comfortable asking for help and raising concerns about compliance with the Code and company policies in accordance with the directions set forth in this Code and consistent with our Listen Up and Speak Up Value. Leaders must also be alert to any situations or actions that may violate the letter or spirit of the Code, violate an Edgewell policy or potentially damage Edgewell's reputation. It is important to act quickly to address such situations. When leaders and managers receive reports of a situation that is unethical, illegal, or potentially damaging to Edgewell's reputation, or suspect that one exists, they should promptly notify appropriate personnel and work to resolve the issue, as described in this Code.

Leaders and managers who know about, or should know about, misconduct and do not act promptly to report and correct the situation will be subject to disciplinary action. Leaders and managers who suspect or receive reports of potential noncompliance with our Code should not perform any investigative or other follow-up steps on their own. Leaders and managers who become aware of suspected misconduct should not contact the person suspected of the misconduct and should immediately follow the Edgewell reporting guidelines to ensure that a complete and proper investigation promptly takes place. Leaders and managers must not retaliate or tolerate retaliatory acts against Edgewell Teammates or business partners who in good faith report an alleged violation of our Code, Edgewell policies or the law to Edgewell or the government, and leaders and managers are expected to clearly communicate to others our "Zero Tolerance Policy" for retaliation, as set forth in this Code.



Discipline for Code of Conduct Violations

Subject to applicable law, individuals who violate our Code or Edgewell policies are subject to appropriate discipline. Disciplinary measures will vary depending on the seriousness of the violation and individual circumstances. Possible disciplinary sanctions include, but are not limited to, written warnings, suspension, and termination. In appropriate circumstances, Edgewell will consider taking legal action or referring matters to public law enforcement authorities for possible prosecution.



Speaking Up:
Asking for Guidance
and Voicing Concerns

We Each Have a Responsibility to Ask Questions

We have a responsibility to ourselves and to our Teammates to conduct business legally and ethically. We should be alert to activities going on around us and speak up if we suspect illegal or unethical conduct by any Edgewell Teammate, contractor, vendor, supplier, director, customer, or other person working for or on behalf of Edgewell.

Sometimes, it might seem easier to “look the other way,” but doing nothing is, in itself, an action that can have serious consequences for us as individuals and for Edgewell. Participation and commitment to monitoring the integrity of our business conduct is instrumental in sustaining our ethical culture. If we do not speak up, Edgewell cannot address the problem.

No code of conduct can cover every business situation that may require an ethical or legal decision. Consequently, if we suspect that someone is behaving illegally or unethically, each of us is responsible for seeking guidance regarding our Code, Edgewell policies and applicable laws when necessary. Speaking up and seeking advice is not a responsibility that can be delegated to others. If we have questions about the law, our Code, or our policies, or if we face situations not specifically addressed in our Code, we should seek advice from our manager or local supervisor, Human Resources, the Legal Department, or Internal Audit before taking any action.

Additionally, anyone may contact the Edgewell Compliance Hotline with questions about business conduct or to report concerns.

Reporting Misconduct – Confidential Telephone Number and Web Address

A confidential telephone number and web address have been established to allow you to report any Code violations, questionable accounting or auditing practices, or any other situation that could affect your work environment or that you think may pose a financial or legal risk to the Company.

You can report your concerns relating to issues covered by this document, confidentially and anonymously¹, by calling EthicsPoint, our external service provider, toll-free at 855-405-6557, or by filing a report at our confidential web address: www.edgewell.ethicspoint.com.

If you do not speak English, EthicsPoint will have translators available.

All reports are taken seriously and are investigated. All reports concerning financial matters will be forwarded to the Chairman of the Audit Committee of the Board of Directors of the Company. The Chairman will ensure that these matters are investigated. You will not be subject to discharge, demotion, suspension, threats, harassment, or other retaliation or retribution as a result of your good faith reporting of a potential violation of law or of these standards of conduct.

If you need to contact the Legal Department, please contact the Chief Legal Officer, or send an email to LegalEPC@edgewell.com.

Whether calling or using the web address, please be as specific as possible about the situation and location you are describing.



Listen up *Speak up*

¹ The ability to report concerns anonymously may be restricted by the laws of certain countries.

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

HOW TO REPORT



ONLINE

www.edgewell.ethicspoint.com



LEGAL DEPT.

LegalEPC@Edgewell.com



PHONE

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: 1-800-551-155 Step #2: 855-405-6557
Australia - Telstra	Step #1: 1-800-881-011 Step #2: 855-405-6557
Chile	Step #1: 800-225-288 Step #2: 855-405-6557
Colombia	Step #1: 01-800-911-0011 Step #2: 855-405-6557
Germany	Step #1: 0-800-225-5288 Step #2: 855-405-6557
Hong Kong	Step #1: 800-93-2266 Step #2: 855-405-6557
Italy	Step #1: 800-172-444 Step #2: 855-405-6557
Japan	Step #1: 0034-811-001 Step #2: 855-405-6557
Peru	Step #1: 0-800-50-000 Step #2: 855-405-6557
Poland	Step #1: 0-0-800-111-1111 Step #2: 855-405-6557
Russia	Step #1: 8^10-800-110-1011 Step #2: 855-405-6557
Spain	Step #1: 900-99-0011 Step #2: 855-405-6557
Venezuela	Step #1: 0-800-552-6288 Step #2: 855-405-6557
New Zealand	Step #1: 000-911 Step #2: 855-405-6557

Teammates calling from all other countries should consult www.edgewell.ethicspoint.com for additional dialing information and instructions.

Zero Tolerance Policy for Retaliation

As a company, we do 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. We take claims of retaliation seriously — anyone found to have committed a retaliatory act is subject to disciplinary action, up to and including termination. If you or someone you know is the victim of retaliation, report it immediately to any of the Edgewell resources available for reporting.

What Is Retaliation?

Retaliation means taking a negative action against a person for reporting in good faith actual or suspected misconduct to Edgewell or the government or for participating in or cooperating with an Edgewell or government investigation. It can include conduct such as (a) threats of physical harm, (b) threats of or actual termination of employment, (c) less desirable work assignments, (d) managerial or co-worker abuse, (e) exclusion from work activities or (f) negative impact on salary or benefits. This does not mean, however, that managers cannot take appropriate employment-related action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

When we in good faith seek advice, raise a concern, or report actual or suspected misconduct, we are following the spirit of our Code and Doing the Right Thing. We should all feel comfortable reporting actual or suspected misconduct without fear of losing our jobs or other harm.

Investigating Reports of Misconduct

All reports of potential violations of applicable law, this Code or Edgewell policies are promptly evaluated and investigated where appropriate. Depending on the circumstances, the investigation may be conducted by managers or local supervisors, members of the Legal Department, Human Resources, Internal Audit 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.

The Board of Directors, as a whole or through one of its committees, is informed of hotline reports and other appropriate reports of suspected business misconduct and the results of the investigations of those reports. The Board of Directors, as a whole or through one of its committees, may request managers, local supervisors, or the Chief Legal Officer to investigate or may, in its discretion, retain its own advisors to advise or investigate reports.

Participating in an Investigation

Edgewell is committed to ensuring that those Teammates reporting violations or participating in investigations are treated fairly. Any complaint of retaliation will be promptly investigated, per our Zero Tolerance Policy for Retaliation.





Doing the Right Thing: How We Uphold the Code of Conduct and Our PVB

Our Purpose, Values and Behaviors

By following our Code, as well as our Purpose, Values and the Behaviors that inspire them, we can establish and maintain an ethical culture in our company, where integrity and respect for others lead all of our actions.

Our PVB are an intrinsic part of who we are as a company and as individuals. They are a commitment we make to each other and to our shareholders, business partners, consumers, customers, suppliers, and communities that we will always act with integrity and strive to achieve excellence.



People first

People First

Our secret is people. Whether with our team or in our communities more broadly, we make every encounter an opportunity to practice empathy, show authenticity, and deepen relationships. Our accomplishments come from our people, so we find joy in celebrating each other whenever we can. We care for our people and communities, so we invest in them.



Own it together

Own it, Together

We bring big ideas to life by balancing individual ownership with teamwork and collaboration. At every level, we take initiative without needing a nudge. We take joy in collaborating, because we know teamwork leads to great things, but we're always personally accountable ourselves. We delegate and empower our teams to lead, and finish strong, so that our innovative ideas can become a new reality.



Listen up speak up

Listen Up and Speak Up

We create an environment where good ideas can thrive, so our business does too. We share honest, compassionate feedback and helpful insights in service of moving forward. Even when something is hard to hear, we aren't afraid to listen to the people around us and remain open to change. We welcome new voices and actively seek out divergent opinions. We listen deeply, speak directly, and create an environment that's open to difference.



Move forward

Move Forward

We think proactively, continually setting bold and aggressive goals both individually and as a team. Because we are not afraid to take smart risks and move forward quickly, failure is sometimes inevitable. That's OK; we learn from our mistakes and boldly move forward to continue to pursue innovative ideas. We recognize our past successes and failures and take pride in our resiliency.

Equal Employment Opportunity

Non-Discrimination Policies

Our Teammates provide us with a wide complement of talents which contribute greatly to our success. The Company is committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity, and respect. It is our policy to provide equal opportunity for all Teammates and applicants on the basis of merit. Participation in Company-sponsored programs will not be restricted in any manner prohibited by law.

Our practice is to comply with all U.S. federal, state, and local laws and foreign laws prohibiting discrimination on the basis of:

- race, color, or ancestry
- creed or religion
- gender
- age
- physical or mental disability
- national origin
- sexual orientation
- veteran status
- gender identity
- ethnicity
- any other trait protected by law

No one shall discriminate against any individual because of one of these protected characteristics with respect to any offer, or term or condition, of employment. Our goal is to have Teammates perform their roles and responsibilities to the best of their abilities; we will make reasonable accommodations for the known physical and mental limitations of qualified individuals with disabilities, if needed, to reach this goal. When warranted, the Company also provides paid and unpaid leaves of absence from work.

Company policy prohibits retaliation because of a leave against someone who is or was on an approved leave of absence.

**Edgewell is committed to treating our
people with fairness, dignity, and respect
and provides equal opportunity for all
Teammates.**

Rights with Respect to Benefit Plans

Every Teammate of the Company is entitled to exercise, or attempt to attain, their rights under the Company's benefit plans. No Teammate may be discriminated against for exercising or attaining or prospectively attaining rights under a benefit plan, and no adverse employment action shall be taken against a Teammate for such actions.

Work Environment Policies

Every Teammate of the Company has the right to work in an environment free of harassment. We are a global company, and the Company will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of our Teammates. The Company's policies prohibit behavior that creates an intimidating, hostile or offensive working environment. All Teammates should be aware that an intimidating, hostile or offensive working environment can result from disparaging or insensitive comments, actions, gestures, jokes or epithets, or the display of derogatory, obscene, demeaning, or objectionable signs, posters, cartoons, photographs, or drawings. The Company also will not tolerate unlawful sexual harassment that includes unwelcome sexual advances, requests for sexual favors or other unwelcome verbal or physical conduct of a sexual nature.

Any Teammate who engages in prohibited harassing or discriminating conduct, including degrading or humiliating jokes, slurs, intimidation, or other inappropriate behavior that violates Company policy will be subject to the appropriate disciplinary action, which may include immediate termination of employment.

The Company prohibits retaliation against any Teammate who participates in an investigation or raises a good faith complaint of alleged harassment or discrimination.

Employment practices covered by this policy include:

- hiring and recruiting
- training
- promotions and transfers
- terminations
- compensation and Teammate benefits.

As a global company, we are committed to developing and managing a strong, diverse organization. In the United States, as a federal contractor, the Company also will take affirmative action in these employment practices and will monitor and evaluate affirmative action programs in order to identify areas of concern and to achieve affirmative action goals and objectives. Managers whose areas are subject to such programs are expected to cooperate with the Company's affirmative action efforts.

Reporting Requirements

If you believe you have been subject to, or become aware of, unlawful harassment or discrimination, you should either notify a member of management or a Human Resources representative, or you can use one of the confidential methods of communication listed in this Code.

Safety

Our Company policy is to provide safe, clean, healthy, and sanitary working conditions at all facilities, and to follow all applicable occupational safety and health laws and regulations. You must perform your work in a safe manner.

If you are aware of any unsafe or hazardous conditions or practices, you should report them to your supervisor, the Legal Department, or Internal Audit for the most immediate response. You can also use one of the confidential methods of communication listed in this Code.

Accessibility

The Company is committed to complying with applicable federal, state, and foreign laws regarding the accessibility of Company facilities to persons with disabilities. The Company will endeavor to make new facilities accessible to all persons and existing facilities as accessible as practicable.

You should ensure that you conduct Company- sponsored programs in accessible locations and with appropriate accommodations, where required. If you have questions about this, you should discuss the matter with your Human Resources representative or an attorney in the Legal Department.

HIPAA Privacy Practices & Notice (US Only)

In compliance with the standards established under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Company policy, the Edgewell Health Care Program, which encompasses the Edgewell Medical Plan, the Edgewell Dental Plan, and the Edgewell Vision Plan, is required to protect the privacy of individually identifiable Teammate health information received, generated, or transmitted by the Edgewell Health Care Program.

All Edgewell Teammates will be provided with a Notice of Privacy Practices regarding the privacy and handling of Protected Health Information (PHI). PHI will be handled in accordance with the terms of the regulation and the Edgewell Health Care Program HIPAA Policy. The misuse or misappropriation of PHI by Teammates, members of the Edgewell Benefits Governance Committee, contractors or business associates can result in disciplinary actions or sanctions, and in certain situations, civil or criminal penalties.

For general information about Edgewell's privacy policy and practices contact Edgewell at (203) 944- 5500 and request to be directed to the Corporate Benefits Department. Complaints regarding potential violations of the privacy policy should be mailed to: Edgewell Personal Care, Benefits Department - HIPAA - Privacy Officer, 6 Research Drive, Shelton, CT 06484. If you are not satisfied with Edgewell's response or you believe that your privacy rights have been violated, you also have the right to submit a complaint to the Secretary of the Department of Health and Human Services, Hubert H. Humphrey Building, 200 Independence Avenue SW, Washington, DC 20201. The Company will not retaliate against any Teammate or individual for invoking one of the rights discussed in the Privacy Notice, for raising a complaint of possible violation, or for participating in an investigation.



Compliance with Laws

We expect all Teammates to comply with all applicable laws, both within and outside the United States. The use of funds or assets of the Company in connection with any unlawful act or improper purpose, including illegal payments to government officials or agents, and the establishment of undisclosed or unrecorded funds, is strictly and unconditionally prohibited.

The Company has developed an Ethics and Compliance Program to help ensure that this standard is met. Under our Program, we conduct periodic audits of various business units and activities, as well as of other Company programs. You have a duty to respond truthfully to Company investigations, compliance surveys and direct inquiries by supervisors or legal counsel regarding business conduct. In addition, if you receive the Company's annual Code of Conduct questionnaire, we expect you to respond promptly.

You may contact a supervisor, Internal Audit, or an attorney in the Legal Department for interpretations and guidance about these matters.

Securities Laws

In the course of your employment, you may become aware of non-public information about the Company that is material to an investor's decision to buy or sell the Company's common stock. Material non-public information may include information about financial results, plans for acquisitions, divestitures, mergers or joint ventures, new product information or marketing strategies, or other significant corporate transactions.

Securities laws and Company policy prohibit you from trading in, or influencing others to trade in, common stock of the Company on the basis of material non-public information. This prohibition includes transfers into and out of the Company common stock funds of Company benefit plans. You may also not disclose material non-public information about the Company to family members or others who may trade in the Company's common stock on the basis of that information.

We expect all Teammates to comply with all federal, state, and foreign securities laws and the rules of the New York Stock Exchange.

We also have Company policies that:

- prohibit Teammates from speculating in Company securities or market options for Company securities (commonly known as "puts" and "calls") by buying and selling them based on relatively short-term price movements.
- prohibit Teammates from engaging in "short sales" involving Company securities. A short sale is the sale of securities not actually owned by the Teammate.

Before you trade in the Company's common stock, you should review the Company's Insider Trading Policy for guidance. If you have a question about an unusual situation, please contact an attorney in the Legal Department.

question

Does our Insider Trading Policy apply to all Edgewell Teammates?

Q&A insider trading

answer

Yes. No Teammate is allowed to trade in Edgewell securities when he or she has material non-public information about Edgewell. The policy applies to any Teammate, and even non-employees, who may possess material non-public information about Edgewell.

Confidential Information

Confidential information about the Company's strategies and operations is a valuable asset. You may have access to, or be provided with, confidential, non-public information in connection with your position with the Company. Confidential information includes personnel data maintained by the Company, customer and supplier lists, pricing and cost data, information pertaining to acquisitions, divestitures, joint ventures and mergers, information pertaining to product development and patenting decisions and efforts to obtain patents in the U.S. and abroad, financial data, research data, strategic plans, marketing strategies, techniques, and proprietary computer software.

question

How do I handle conversations about work matters when out with my Teammates for lunch?

Q&A

confidential
information

answer

Conversations about Company business in public places should not include Edgewell confidential information unless a business need requires you to share it with an authorized individual. In general, avoid conversations, discussions, or talking on the phone about work matters in public places (yes, even in elevators!). If you are unsure whether information is confidential, don't share it!

Although you may use confidential information in the performance of your job, you may not disclose this information to anyone outside the Company without

specific authorization and, generally, agreement from the outside party to maintain the confidentiality of the information. Within the Company, you should only discuss this information, on a strictly "need to know" basis, with other Teammates who require the information to perform their jobs.

Business Practices

Integrity in Business

You must always deal fairly with the Company's customers, distributors and agents, and competitors. Although the Company expects you to work to advance its interests, you should do so in a manner that is consistent with the highest standards of integrity and ethical dealing. You should never engage in unethical business practices, such as the following:

- stealing trade secrets
- unfairly or dishonestly obtaining competitive information
- disparaging or lying about a competitor's products, business practices, or services
- inducing the breach of a legally binding contract
- paying bribes or kickbacks to obtain a sale, and
- misrepresenting the Company's products or their performance, sales terms or policies, or any other material information that is likely to influence a sale.

Remember - in all of your business dealings, you must be truthful and avoid deception. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other unethical business practice.





Integrity in Government Contracting

The Company expects you to work in a manner consistent with the highest standards of integrity and ethical dealing in connection with Company business with the government. As with all other business dealings, you must be truthful and avoid deception. You should never engage in unethical business practices, such as the following:

- Submit false claims or otherwise engage in fraudulent activity.
- Take action that constitutes a conflict of interest.
- Pay bribes or kickbacks.
- Violate government rules on gratuities; and
- Fail to report government overpayments to the Company.

Acceptance of Gifts or Favors

Neither you nor any member of your immediate family should solicit the Company's current or potential customers, suppliers, contractors, outside agencies or other business associates for any money, gifts, free services, or special favors.

You may not accept unsolicited gifts or entertainment if they could influence, or appear to influence, your business decisions on behalf of the Company, or interfere with your ability to be impartial in carrying out your duties. You should never accept cash, gift certificates or other cash equivalents, regardless of the amount. However, social amenities customarily associated with legitimate business relationships, including nominal gifts and dinners at business meetings, and tickets to athletic or other cultural events where business is discussed with the provider of the tickets, are acceptable if they would not be expected to influence your impartial business judgment.

The Company may adopt more specific policies limiting the value of gifts that may be accepted, and may require notification of your supervisor, or other personnel, of any gifts that you are offered. If you have questions regarding any applicable policies, you should consult your supervisor or a member of the Legal or Internal Audit Departments.

Business Gifts

You may give business gifts of nominal value only when:

- giving such a gift is in line with generally accepted local business ethics.
- it is not in violation of any applicable law; and
- you have no reason to believe the receipt of your gift would violate the policies of the recipient's employer.

We must not accept unsolicited gifts or entertainment if they could influence, or appear to influence, a business decision.

Meals, Transportation and Entertainment

You must make sure you act in accordance with the highest ethical standards when, in connection with Company business, you accept or provide meals, transportation, or entertainment. You must also be sure that such expenditures do not violate applicable federal, state, or foreign laws. If you have any questions about their legality, you should contact an attorney in the Legal Department.

All business entertainment or business-related gift giving must be properly documented in accordance with Company policy.

question

I am interviewing third-parties for assistance on a potential project. One of the companies has offered me tickets to a sporting event, all expenses paid. May I accept the offer?

Q&A

gifts, meals, and
entertainment

answer

Social amenities customarily associated with legitimate business relationships, including nominal gifts and dinners at business meetings, and tickets to some events where business is discussed may be acceptable if they would not be expected to influence your impartial business judgment. To determine what types of gifts may be acceptable, you should contact your manager and the Legal Department.

Antitrust

You must comply fully with federal, state, and foreign antitrust laws in your business practices. Under both US antitrust laws and antitrust laws of other countries, it is never acceptable to enter into agreements with competitors regarding pricing, customers or terms of sale, and any discussions with competitors regarding those matters can subject you and the Company to

significant penalties. Because of the danger, you should avoid discussions with competitors in general, and you should never have any discussions or dealings of any kind with competitors of the Company regarding any of the following matters:

- prices or discounts.
- pricing or bidding formulas, or bid rigging
- discount rates, credit terms, maximum pricing
- terms or conditions of sales or purchases.
- an allocation of markets, territories, customers, or suppliers; and
- a refusal to deal with, or a boycott of, any customer or supplier.

If you believe there is a need to discuss prices or discounts or terms of sales with competitors, you must first, in all cases, obtain the approval of the Chief Legal Officer of the Company.

At trade or technical association meetings, be alert to potential situations where it may not be appropriate for you to participate in discussions with our competitors. If a competitor raises a prohibited subject, end the conversation immediately and notify the Legal Department of the incident.

At other times, if you are contacted by a competitor, you should immediately end the conversation and notify the Legal Department of the incident.

You may not engage in any conduct which violates, or is likely to violate, any antitrust law. If you work in a sales, marketing, or advertising position, you should be familiar with Company guidelines and policies which govern business practices acceptable to the Company in those areas, including standards related to the Company's pricing practices and promotional policies.

Any questionable act which may be considered a violation of an antitrust law should be promptly reported to the Legal Department.



European Competition Laws

In the countries of the European Union, competition laws prohibit agreements with competitors which:

- ban exports to other territories of the EU
- limit warranties to the country of purchase
- prevent customers from using products outside the country of purchase
- restrict sales or supply by country or territory
- impede parallel trade – the import of genuine but less expensive products from elsewhere in the EU
- penalize dealers that sell outside their territories.

In addition, if a seller has dominant or substantial market position, EU Competition Laws may prohibit:

- requiring customers to purchase products exclusively from that seller
- refusing to supply an existing customer without reasonable cause
- restricting distributors from selling competitive products
- discriminatory pricing or other conditions of sale, or setting discounts on other than a legally acceptable basis
- pricing products below average cost in order to drive a competitor out of business
- tying the sale of a dominant product to the purchase of another.

Any proposals which could involve any of the above matters should be carefully discussed in advance with the Legal Department.

Any questionable act which may be considered a violation of any antitrust or competition law, whether in the United States or elsewhere, should be promptly reported to the Legal Department.

Conflicts of Interest

As a Teammate, you have a duty of loyalty to the Company. A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. You should not use your position with the Company to gain a personal advantage, or to use Company resources for other than Company purposes. You should never act in a way that is detrimental to the Company.

It is your obligation to ensure that you remain free of conflicts of interest in the performance of your responsibilities to the Company. If the following situations involve you or any member of your immediate family, we believe real or perceived conflicts of interest can arise:

- association as a director, employee or consultant with any enterprise that presently competes with, or is a customer, supplier, or contractor of the Company.
- having a controlling or substantial interest, or ownership of a substantial stock position, in a competitor, a customer, a supplier or a contractor of the Company, except for holdings in a publicly traded corporation where the amount owned is insignificant in relation to the total amount of publicly held securities of that company; or
- formal or informal agreements, arrangements, or understandings whereby a personal benefit will accrue to an officer, Teammate or director of the Company, or a member of his or her family, as a result of action taken in the performance of the individual's duties on behalf of the Company.

In addition, to avoid the appearance of conflict, the Company prohibits Teammates that are related, married, cohabitating or in a romantic or personal relationship from being employed in a direct reporting relationship. Situations which might constitute a conflict of interest must be reported to Human Resources, the Legal Department or Internal Audit within ten (10) days after you become aware of the conflict.



Theft from the Company; Personal Use of Company Resources

Theft from the Company will not be tolerated – whether in the form of direct theft of inventory or other assets of the Company, or in the form of indirect schemes to defraud the Company. Any of the following activities will subject you to disciplinary action, including termination of employment, and, in addition, the Company may seek prosecution under applicable criminal laws:

- using Company funds for personal purchases
- padding expense reports or engaging in expense reimbursement schemes
- authorizing checks to be issued to phantom service providers or other personal accounts
- selling Company property for personal profit, or profiting off of overcharges to the Company, and
- accepting bribes or kickbacks related to your responsibilities to the Company

It is the responsibility of each Company Teammate to preserve the Company's assets, including time, materials, supplies, equipment, and information.

Company resources are to be maintained for business related purposes. As a general rule, the personal use of any Company asset without the prior approval of your supervisor is prohibited.

You should not use Company property, information, or position for your personal gain, or compete with the Company in general or with respect to specific transactions or opportunities. If, in the course of your employment, you become aware of business or financial opportunities in any of the Company's areas of business, you should not take advantage of those opportunities personally, or make it possible for another person or organization to take advantage of those opportunities, unless the Company has expressly decided not to act on the opportunity. You should not use Company trademarks or logos unless the use is for Company business. The occasional use of items, such as copying facilities or telephones, where the cost to the Company is insignificant, is permissible. Any use of Company resources for personal financial gain unrelated to Company business is prohibited.

All communications systems, computers, and content thereon, electronic mail (email), intranet (SharePoint); Internet access, or voicemail, are the property of the Company and are to be primarily used for business purposes. Limited reasonable personal use of the Company's communications systems is permitted; however, subject to the provisions of privacy laws in local countries, you should assume that these communications are not private. The Company reserves the right to periodically access, monitor and disclose the contents of SharePoint, OneDrive, email, and voicemail messages. Access and disclosure of an individual

Teammate's files, or accounts, or messages may be done only for appropriate business reasons, upon review by the Legal Department.

Teammates may not use internal communication channels or access to the Internet at work to post, store, transmit, download, or distribute any materials that are threatening, knowingly, recklessly, or maliciously false or slanderous, or obscene, that violate Company policies, including those described under "Equal Employment Opportunity" in this document, or that constitute or encourage a criminal offense, give rise to civil liability, or otherwise violate any laws. Additionally, these channels of communication may not be used to send chain letters, mass mailings, personal broadcast messages, messages with content that violates Company policy, or copyrighted documents that are not authorized for reproduction, nor are they to be used to access the accounts or files of others without approval or open misaddressed mail.

Teammates that abuse the Company's communications systems or use them excessively for non-business purposes may be subject to disciplinary action, which may include termination of employment, or discontinuance of further access to those systems. Teammates may reference the Company's Information Systems Security Policy and Internet Security Policy.



International Business

In today's global economy, it is important to understand fully the laws and regulations governing our interactions with other countries. All Company Teammates, agents and representatives are expected to abide by the laws of the United States and the laws of any other countries in which the Company conducts its business.

Bribery; Payments to Officials

It is always illegal, and against Company policy, to bribe government officials of your own country. In addition, under the U.S. Foreign Corrupt Practices Act and the regulations of the Organization for Economic Cooperation and Development ("OECD"), it is also illegal to pay directly or indirectly, or offer to pay, cash, or provide benefits to, any foreign or domestic government official in order to obtain or retain business, or to obtain any improper advantage in the conduct of your business, such as favorable tax treatment, the grant of a license, etc. For purposes of these laws, a government official includes any officer or Teammate of that government or any of its agencies, departments, courts, etc., as well as officials or agents of public international organizations, such as the World Trade Organization. (In certain situations, it may be acceptable to make facilitating payments in order to expedite routine government action. These situations must be carefully analyzed so as not to violate any applicable law – if you believe such a payment is warranted, you must first consult the Legal Department before you take any action.)

It is also a violation to make a payment to a third party, such as a sales agent, with reasonable knowledge or expectation that the payment will be passed along to a government official. The following situations are strongly suggestive of unlawful conduct by your agent and should warn you of potential violations:

- the agent has an extremely close relationship with a government official or agency
- the agent engages in undue secrecy, or warns you "Don't ask"
- you receive inflated invoices or are asked to pay unusual rebates
- the agent submits unexplained or unusual bonus requests or expense reports, or
- the agent requests that you make payments to unrelated parties or in another country.

If you have questions about unusual conduct on the part of your agent, you should immediately contact the Legal Department.

Payments to foreign political parties and candidates on behalf of the Company may violate the Foreign Corrupt Practices Act as well as the election laws of the foreign country involved. You may not make such payments without the approval of the Company's Chief Executive Officer and the Chief Legal Officer.

question

I need to obtain approval for a project as quickly as possible. The government employee I contacted has offered to speed up the process if I pay him a "small fee." May I make a small payment to a government employee to speed up the approval process?

Q&A corruption and bribery

answer

No. This type of payment is known as a "facilitation payment" and is prohibited by Edgewell. You may not offer or pay any amount to government officials to facilitate government approvals, even if it will speed up a project. You should notify your manager and the Legal Department of this request. In certain cases, official payments paid directly to government agencies (not to government officials) for expedited services may be permissible but check with the Legal Department first.

U.S. Anti-Boycott Laws

United States law prohibits the Company and, generally, its subsidiaries, and their Teammates and agents, from participating in illegal boycott activity of foreign countries, and requires that demands or requests for participation be promptly reported to U.S. trade officials. The law prohibits boycott requests to:

- refuse to do business with a boycotted firm or in a boycotted country
- take discriminatory action against any person based on race, religion, sex, or national origin
- furnish information about race, religion, sex, or national origin, or about business relationships with boycotted countries or firms
- furnish information about membership in, or contributions to, charitable or fraternal organizations that support boycotted countries, or
- implement letters of credit that contain prohibited conditions and requirements, including negotiating or issuing the letter, honoring it by acceptance, or paying drafts under the letter.

You may comply with local prohibitions on imports from a boycotted country, or the use of carriers from that country; import and shipping document requirements with respect to country of origin, name of carrier, shipping routes, etc.; unilateral selection by boycotting countries of carriers, insurers, suppliers, etc.; export requirements relating to shipments or transshipments of exports to a boycotted country; and immigration, passport, visa or employment requirements, provided that you may not provide information about Teammates of the company, unless you are merely facilitating the transfer of information supplied by a Teammate.

As noted above, if you receive a boycott request, a report must be made to U.S. trade officials even if no action is taken in response to the request. If you receive such a request, you must immediately contact the Legal Department so that a proper report may be prepared. However, the following requests are not reportable because of their common use for non- boycott purposes:

- requests to refrain from using a carrier from a particular country
- shipping route requests
- requests to supply an affirmative certificate of origin
- requests to supply an affirmative certificate regarding the name of a supplier or manufacturer of goods
- requests for compliance with the boycotting country's laws (other than an express request related to the boycott)
- requests for visa information for individuals

- requests for affirmative certificates indicating the destination of exports or confirming that cargo will be unloaded or discharged at a particular destination
- requests for "vessel eligible" certificates
- requests for certificates concerning local agents of insurance carriers

Trading Sanctions

You must ensure that the Company complies with all trading sanctions on any foreign country imposed on American companies by the United States Government, as well as sanctions on trading with entities or individuals linked to those governments or linked to terrorist or narcotic- trafficking activities. The Company will not knowingly participate in any activity that would violate federal and foreign laws and regulations governing imports and exports. If, because of name, affiliation, location, or any other reason, you have reason to suspect that transactions with a customer or supplier, new or existing, may violate those sanctions you should contact the Legal Department immediately to determine if transactions are permitted.

If you have any questions regarding applicable trading sanctions, or conflicts between the laws of countries in which the Company conducts its business, you should contact an attorney in the Legal Department.



Financial Reporting and Records

The Company maintains accounting and internal control systems to provide assurance that Company assets are safeguarded against loss. We must maintain a high standard of accuracy and thoroughness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, Teammates, and shareholders. They are also necessary for compliance with tax and financial reporting requirements.

All financial information must reflect actual transactions and conform to generally accepted accounting principles and established Company financial policy. No undisclosed or unrecorded funds or assets may be established. All transactions and disbursements must be reported accurately, completely and in appropriate detail in order to ensure full accountability for all assets and activities of the Company and to supply the data needed in connection with the preparation of its financial statements. No one should make fraudulent or false entries for any reason in the books, records, or accounts of the Company, nor should expenses be incurred on behalf of the Company for any unauthorized purpose.

The Company's public disclosure, including disclosure in reports filed with, or submitted to, the U.S. Securities and Exchange Commission and other governmental agencies, and in its earnings releases and other public communications, should be full, fair, accurate, timely and understandable. Teammates, officers, and directors should act in good faith, responsibly, with due care, competence, and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated to personal interests. No one should make, or ask anyone else to make, any false, misleading, or incomplete statements in the Company's public statements or filings, or in response to questionnaires used in the preparation of such statements, or in response to any audit of the Company's financial statements.

Financial and accounting officers and managers must exhibit and promote the highest standards of honest and ethical conduct and must encourage professional integrity in all aspects of the Company's financial organization. They should share knowledge and maintain skills important and relevant to the fulfillment of their responsibilities. Teammates with financial and accounting responsibility should be encouraged to inform senior management of deviations from established Company financial policies and be informed that there will be no reprisals for providing such information. Information concerning financial irregularities may also be reported confidentially in the manner described earlier in this document.

Records Management

Various laws and good business practices require Edgewell to keep certain business records, including electronic records, for specific periods of time. In addition, we may not discard certain relevant records when litigation, subpoenas, audits, or investigations are pending or anticipated. Storing business records

longer than necessary, however, incurs needless costs, potential risks for Edgewell and prevents the efficient retrieval and accessibility of relevant records.

We must all strictly comply with Edgewell policies on management of our records. For specific information regarding how long to keep and how to dispose of business records, consult all applicable policies and schedules, including the Record Retention Policy and Record Retention Schedule.

Q&A records management

question

My manager has asked me to shred documents or delete emails related to a project handled by my department. Is it OK for me to do this?

answer

If there is no ongoing or likely lawsuit, investigation, audit, or examination to which the documents may relate, the destruction of documents and emails in the ordinary course of business is permissible if done in accordance with our Record Retention Policy and Record Retention Schedule.

Compliance and Waivers of Business Standards

You will be held accountable for your adherence to these standards of conduct. Your failure to comply with them may result in disciplinary action, up to and including termination of employment. Violations of these standards may also constitute violations of law and may result in civil and criminal penalties for you, your supervisors and/or the Company. If you have evidence of fraud or other breaches of these standards of conduct, you are encouraged and expected to report them as described in this document. **If you have reason to believe that any of the Company's books and records are not being maintained in an accurate or complete manner, if you feel that you are being pressured to prepare or destroy documents in violation of**

Company policy, or if you become aware that any misleading, incomplete or false statement has been made to an accountant, auditor, attorney or government official in connection with any audit, examination or filing with a government agency, you are expected to report such matters immediately, as described in this document.

The Company's failure to report certain violations of these standards, particularly violations relating to government contracting, may result in civil and/or criminal penalties for the Company. Consequently, prompt reporting is essential.

Failure to report a violation can lead to disciplinary action which may be as severe as the disciplinary action against the person who committed the violation.

Violations may be reported to your supervisor or the supervisor of the Teammate who commits the violation, but they should also be reported to Internal Audit or the Chief Legal Officer of the Company, or confidentially reported through the phone numbers and web address provided at the front of this document. You will not be subject to discharge, demotion, suspension, threats, harassment, or other retaliation as a result of your good faith reporting of a potential violation of law or of these standards of conduct.

Any waivers of these standards of conduct must be approved,

- with regard to any executive officer of the Company, by the Board of Directors; and
- with regard to any Teammate who is not an executive officer of the Company, by the Chief Executive Officer or a person designated by the Chief Executive Officer.



No waiver of these standards of conduct with regard to an executive officer will be effective until that waiver has been reported to the person responsible for the preparation and filing of the Company's reports on Form 8-K, in sufficient detail to enable that person to prepare a report containing all required disclosure with respect to the waiver. The Company will promptly disclose, as required by federal securities laws, details regarding waivers of these standards of conduct with regard to an executive officer.

Environmental Matters

Our Company policy is to comply with all applicable federal, state, and foreign environmental laws and regulations. We expect Teammates to conduct Company business in an environmentally sound manner. You should perform your duties to:

- avoid an unreasonable adverse impact on the environment,
- comply with all Company policies concerning environmental matters,
- cooperate with environmental agency inspectors, and
- assist in emergency response efforts when they arise.

In addition, you should immediately alert your supervisor, the Legal Department, or Internal Audit to any situation regarding the discharge of a hazardous substance, improper disposal of waste materials, or any situation which may be potentially damaging to the environment. The Company will not tolerate retaliation against any Teammate who reports any violation of environmental laws to management or to a government agency, or who participates in a Company investigation. Teammates who condone or permit a violation of environmental laws will be subject to disciplinary action.

Each Company facility should promptly advise the Legal Department or the Company's Environmental Health & Safety Department of any citations, complaints or legal actions initiated by any government enforcement agency or any outside party involving environmental matters. If you have any questions regarding environmental practices and applicable law, you should contact an attorney in the Legal Department.

Human Rights

We prohibit the use of forced or otherwise illegal labor and human trafficking. We do not condone the exploitation, physical punishment, abuse, trafficking or involuntary servitude of children or others. We require our business partners to exhibit respect for fundamental human rights and human dignity and respect for the equal rights of men and women while doing business with us. Our standards for and expectations of our suppliers (including any third parties that produce goods for, or provide goods to Edgewell) are explicitly outlined in our Supplier Code of Conduct. We expect our business partners to demonstrate high standards of ethical business conduct.

We hold our suppliers to the same high standard of ethical business conduct as that to which we hold ourselves.



Social Media and Other Online Activity

Those of us who use online communication tools like blogs, social media sites and other digital platforms — whether on our own personal time or in an official capacity on behalf of Edgewell — assume responsibility for ensuring that our activities do not violate Edgewell policies or cause Edgewell to violate laws or regulations.

Any time we endorse or promote Edgewell or any of our products in a forum in which our connection to Edgewell is not obvious, whether in person or online, we must disclose our connection to Edgewell. Such disclosure must be clear and conspicuous, readily visible within our communication, and understandable and apparent to the average reader near the beginning of the communication. These requirements apply even to comments we make on our own personal blog or social media pages or on third-party websites, as well as to actions we take on Edgewell-affiliated websites, such as product ratings and reviews and our brands' social media pages. If we use social media or other forums to express our personal views regarding Edgewell, our products or our competitors, we should not indicate or imply that our comments represent the positions, strategies, or opinions of Edgewell. If we engage or provide something of value to a consultant, agency, celebrity, consumer, blogger, or other party to entice or encourage them to review, promote or endorse Edgewell or our products, or criticize our competitors' products, we must ensure that those parties also disclose their affiliation with Edgewell. Additionally, we should never attempt to inappropriately view or access the personal social media accounts of our Teammates and job applicants.




social media

question

I was browsing a social media site and saw a criticism of an Edgewell product. I'm very familiar with the product and want to respond to the criticism with positive comments about the product. Do I have to say that I work for Edgewell?

answer

Yes. Anytime we endorse or promote Edgewell or our products online we must clearly and conspicuously disclose that we are a Teammate, director, or consultant of Edgewell, unless that fact is already apparent.

Product Quality

The Company's intent is to produce products of the finest quality for its customers and the consuming public. Our quality standards are meant to be consistent with applicable laws and regulations, and to match or exceed recognized good manufacturing practices.

Each of us is responsible for performing our work in such a way that the integrity and quality of the Company's products is maintained. If you are aware of any actions or conditions that may jeopardize these standards, you should report them to your supervisor, the Legal Department, or to Internal Audit.

Any time we endorse or promote Edgewell ... we must disclose our connection to the company in a clear and conspicuous manner.

Copyrights, Trademarks and Patents

The Company is strongly committed to defending its own copyright, trademark, and patent rights, and to respecting the valid and enforceable intellectual property rights of others, whether in the U.S. or in other countries. It is committed to maintaining the highest standards of ethical conduct in connection with such intellectual property rights of others.

The Company's colleagues should not photocopy, upload, download, or otherwise create hard or electronic copies of materials unless such materials are necessary to further business needs AND appropriate permissions to make such copies have been secured from the copyright owner. All other reproduction of U.S. copyrighted materials is prohibited. When in doubt you should contact an attorney in the Legal Department before any materials are copied.

All other reproduction of U.S. copyrighted materials is prohibited. With respect to any copyrighted materials, not specifically listed on the list of CCC approved titles, you should contact an attorney in the Legal Department before any such materials are copied.

The Company owns numerous trademarks for its products and services worldwide, including some of our most notable marks like SCHICK, WILKINSON SWORD, EDGE, SKINTIMATE, PLAYTEX, STAYFREE, CAREFREE, O.B., BANANA BOAT, HAWAIIAN TROPIC, WET ONES, BULLDOG, JACK BLACK and CREMO. The Company grants licenses and permissions to use and/or display these marks only under strict licensing provisions and after appropriate internal reviews and approvals. Personal use by Teammates of the Company trademark is prohibited. All requests to display or in any way use the Company's trademarks should be immediately referred to the Legal Department for handling.

Unsolicited disclosures or ideas that are received by Teammates of the Company that appear to offer suggestions relating to the Company's products or operations should be immediately referred to the Legal Department for handling. You should not disclose these suggestions to anyone else in the Company without the approval of the Legal Department.

Political Contributions

Under federal law, the Company and its subsidiaries are prohibited from contributing cash or other resources to candidates for federal office. Other resources include non-financial donations such as using work time and telephones to solicit support for a candidate, or the loaning of Company property for use in a campaign.

In addition, some states prohibit or restrict contributions by corporations to candidates for state or local office, and it is the Company's policy to comply fully with these statutes. To assure compliance with laws regarding political contributions, no Company contributions may be made to political candidates

without the prior approval of the Company's Chief Executive Officer or any President of the Company and notification to the Chief Legal Officer.

Payments to foreign political parties and candidates on behalf of the Company may violate the Foreign Corrupt Practices Act as well as the election laws of the foreign country involved. You may not make such payments without the approval of the Chief Executive Officer or any President of the Company, and the Chief Legal Officer.



**Edgewell complies with
all regulations
governing political
contributions.**