



Fighting Against Forced Labour and Child Labour in Supply Chains Act Annual Report

For Fiscal Year 2024 (March 1, 2023 – February 29, 2024)

About Helen of Troy

Helen of Troy Limited (“Helen of Troy”) is a global consumer products company offering creative solutions for our customers in two business segments: Home & Outdoor and Beauty & Wellness. Helen of Troy purchases its products from unaffiliated manufacturers and currently market our products in over 100 countries throughout the world. As of February 29, 2024, Helen of Troy employed 1,927 full-time associates worldwide.

More information concerning our business performance and organizational structure is in our most recent Form 10-K filing on our website (www.helenoftroy.com).

Our policies, values and operations

We embed responsible business conduct principles throughout our supply chains through various means. At a minimum, we expect our company, our associates, our suppliers, and our partners globally to comply with relevant and applicable legal and professional requirements and regulations. In addition, our Environmental, Social and Governance (ESG) [Guiding Principles](#) outline our policies and commitments to maintaining and advancing human rights. Our ESG Guiding Principles specifically address slavery and human trafficking risks in our operations and supply chain as is reflected in our policies relating to freely chosen labour, protecting migrant workers, minority groups and women’s rights and no tolerance for child labour. Associate expectations are outlined in our [Code of Conduct](#), while supplier expectations our outlined in our [Supplier Code of Conduct](#). These codes of conduct are available under www.helenoftroy.com/esg.

Our Board of Directors, through the [Corporate Governance Committee](#), oversees ESG-related matters and its implementation, including our approach to human rights and associated policies and guidelines relating to anti-human trafficking and modern slavery. Our Vice President, Global ESG, who reports to the Chief Legal Officer, leads our ESG program and works closely with our cross functional, corporate-wide ESG Task Force. Our Vice President, Global ESG reports regularly to the Board on these matters. In fiscal 2024, we continued to implement our ESG strategy, which included strengthening our human rights program particularly in our supply chain. We provide updates on our progress in our published ESG Report.

In policies or agreements with third parties, Helen of Troy requires suppliers and contractors to maintain policies and implement a system that contributes to sustainable development and to be financially, environmentally and socially responsible. Helen of Troy expects suppliers to comply with applicable laws, regulations and international standards that require them to treat workers fairly and to provide a safe and healthy work environment. Our Supplier Code of Conduct addresses business practices of our third-party suppliers. It contains specific provisions addressing human rights, labour, and business conduct, including taking affirmative steps such as verification of our product supply chain to evaluate and address risks of issues such as human trafficking, slavery, forced, and child labour. These verifications are conducted either by our internal supply chain audit teams and/or independent third-party auditors.

Our supply chain

In order to mitigate the risk of forced labour or child labour in our supply chains, we expect our suppliers to comply with local legislation and regulations while conducting their activities, including those of their subcontractors, in line with our Supplier Code of Conduct (“relevant standards and practices”).

Each of our suppliers has its own supply chain and we recognize that each level in the supply chain is responsible for ensuring compliance with applicable laws and regulations and for respecting human rights.

New suppliers undergo a social compliance audit, which includes an assessment of its practices to avoid modern slavery and human trafficking. Suppliers are expected to designate management staff to monitor their factories, production facilities and compliance with our Supplier Code of Conduct. Helen of Troy may conduct a mix of announced or unannounced visits and/or have independent third-parties audit to help determine compliance with the Supplier Code of Conduct, including prohibitions on slavery and human trafficking. This helps us identify parts of our activities and supply chains that may carry a risk of forced labour or child labour.

The number of assessments follows our risk-based approach and is dependent on the level of project activity awarded throughout the year and the terms of our contract with the supplier. If gaps are identified, we may work with suppliers to help them understand how to close those gaps or we may ultimately consider terminating the contract, if permitted under our contract terms. Suppliers that are required to develop a corrective action plan may be subject to additional audits, which may be announced or unannounced, as part of Helen of Troy’s monitoring efforts. We strive to include our Supplier Code of Conduct in relevant supplier contracts, where applicable. If permitted under our contract terms, we may seek to terminate contracts with immediate effect if suppliers breach Helen of Troy’s Supplier Code of Conduct.

Our business segments work closely with our key suppliers globally with the goal of improving their environmental and social impacts. We continued to be members of amfori BSCI, SEDEX and Worldly (formerly Higg Index) across our business segments. Our company-wide set of guidelines on supplier compliance, which is aligned with relevant international standards and guidelines such as amfori BSCI, SEDEX and Worldly standardizes our supplier compliance approach. Working with a consultant since fiscal 2022, we completed a human rights risk assessment, with findings and recommendations feeding into our guidelines to support proactive risk identification and management of issues including forced and child labour. The aim is to better understand where targeted improvement opportunities lie within our broader key supplier base and prioritize work with suppliers to address them more effectively. We periodically update our human rights risk assessment, with findings and recommendations feeding into our guidelines to support proactive risk management.

Remediation

1. As we did not identify any instances of forced or child labour during fiscal 2024, no measures have been taken to remediate forced labour or child labour.
2. No measures have been taken to remediate the loss of income to families that results from any measure taken to eliminate the use of forced labour or child labour in our activities or supply chains.

Training

We maintain internal accountability standards and procedures and provide mandatory yearly human rights training and awareness (including on the topics of forced and child labour) to associates with direct responsibility for supply chain management, with the intent to effectively implement our Supplier Code of Conduct.

Assessing Effectiveness

Helen of Troy has implemented an environmental, social and governance (ESG) reporting plan, including information related to key performance indicators on the effectiveness of the steps we have taken on these topics. Every quarter, our supply chain teams report progress on audit compliance and discuss gaps and improvement measures with relevant teams in each of our segments. We are committed to continually improving on the visibility and performance of our supply chain in the relevant ESG areas.

Approval and Attestation

This report was approved pursuant to subparagraph 11(4)(a) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act by the board of directors of Helen of Troy Limited.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Tessa Judge

Chief Legal Officer

Approved on behalf of the Board of Directors

I have the authority to bind "Helen of Troy Limited"

Date: May 29, 2024

Please refer to our www.helenoftroy.com/our-brands/ for information on brands covered by this statement.