Anti-human Trafficking and Modern Slavery Statement

For Fiscal Year 2025 (March 1, 2024 – February 28, 2025)

About Helen of Troy
Helen of Troy is a global consumer products company offering creative solutions for our customers in two business segments: Home and Outdoor and Beauty & Wellness. Helen of Troy purchases its products from unaffiliated manufacturers. 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 values and own operations
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 Sustainability Guiding Principles outline our policies and commitments on human rights, specifically to address slavery and human trafficking risks in our operations and supply chain such as our policies on freely chosen labor, protecting migrant workers, minority groups and women's rights and no tolerance for child labor. Associate expectations are outlined in our Code of Conduct, while supplier expectations are outlined in our Supplier Code of Conduct. These codes of conduct are available under www.helenoftroy.com/sustainability.

Our Board of Directors, through the Corporate Governance Committee, oversees sustainability-related matters and its implementation, including our approach to human rights and its associated policies and guidelines, such as on anti-human trafficking and modern slavery. Our Vice President – Regulatory, Sustainability and Governance (RSG), who reports to the Chief Legal Officer, leads our sustainability program and reports regularly to the Board on these matters. In fiscal 2025, we continued to implement our sustainability strategy, which included strengthening our human rights program particularly in our supply chain. We provide updates on our progress in our published Sustainability Report.

Our supply chain
We expect our suppliers to comply with local legislation and regulations and conduct their activities, including those of their subcontractors, in line with our Supplier Code of Conduct ("relevant standards and practices"). We maintain internal accountability standards and procedures and provide human rights training and awareness (including on human trafficking and slavery) to associates with direct responsibility for supply chain management, with the intent to effectively implement this statement.

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. Our focus, for the purpose of this statement, is visibility on our own direct suppliers complying with relevant standards and practices, however, we expect suppliers to consistently implement compliance throughout their own supply chains.

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, labor, and business conduct, including taking affirmative steps such as verification of our product supply chain to evaluate and

address risks of human trafficking and slavery. These verifications are conducted either by our internal audit teams and/or independent third-party auditors.

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.

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.

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 sustainability areas.

Disclosures

Helen of Troy has implemented a sustainability reporting plan, including information related to key performance indicators on the effectiveness of the steps we have taken on these topics.

This is Helen of Troy's group statement on anti-trafficking and modern slavery for Fiscal Year 2025 (March 1, 2024-February 28, 2025) and is made pursuant to The California Transparency in Supply Chain Act of 2010 (SB 657) and section 54(1) of the UK's Modern Slavery Act of 2015. Please refer to our www.helenoftroy.com/our-brands/ for information on brands covered by this statement.



Tessa Judge
Chief Legal Officer
Approved on behalf of the Board of Directors
Date: February 26, 2025