



Edgewell Personal Care Company

UK Modern Slavery Act and Australian Modern Slavery Act Statement

Edgewell Personal Care Company and its subsidiaries (collectively, “Edgewell”) believes in complying fully with all applicable laws and regulations affecting our businesses. We expect that our employees and business partners will always adhere to the highest ethical business practices. This slavery and human trafficking statement is made by Edgewell pursuant to section 54 of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (collectively, the "Acts") for the financial year ending 30 September 2020 and sets out the steps taken by Edgewell to ensure that slavery and human trafficking are not present in our business or direct supply chain

About Edgewell

Edgewell is one of the world’s largest manufacturers and marketers of personal care products in the wet shave, sun and skin care, and feminine care categories. Edgewell operates in more than 20 countries with extensive retail reach across 50 markets and we are committed to responsibly sourcing the ingredients and materials that we use to produce and package our products. A description of Edgewell’s structure, values, divisions and product brands can be found in our Annual Report on Form 10-K filed with the United States Securities and Exchange Commission on November 20, 2020, which can be found on the Investor Relations section at www.edgewell.com, and in our annual Sustainability Report, which can be found on the Sustainability section of our website.

Policies

We believe our Purpose, Values and Behaviors reflect the high ethical standards that we uphold throughout our business. Our values- **“people first,” “move forward,” “listen up and speak up”** and **“own it together”**- are foundational to our purpose and govern our collaborations with our colleagues, our partnerships with our customers, and our connection to our consumers.

As such, we are committed to ensuring that there is no modern slavery or human trafficking in any of our employees and operations globally. Edgewell strives to promote sustainable business practices across our entire value chain and to embed respect for human rights and zero tolerance of modern slavery across our business. As an extension of our core business, we expect our suppliers to share the same values and ethical standards that we demand of ourselves.



The Code makes clear our opposition to the exploitation of workers through any form of forced or bonded labor, slavery, human trafficking or other labor practices that involve harsh or inhumane treatment. Primary among the provisions is that “Suppliers shall not use any prison, indentured, involuntary or forced labor of any kind. Suppliers shall not engage in slavery or in human trafficking of any kind, including but not limited to the recruitment, harboring, transportation, solicitation, provision or acquisition of persons for labor or services through the use of force, fraud or coercion. Suppliers shall not require any workers to surrender any government-issued identification, passports or work permits as a condition of employment. Suppliers shall not require any worker to remain in employment for any period of time against his or her will.”

To promote human rights across our direct business operations, we require our network of suppliers and direct supply chain to comply with the Code through incorporation into our contracts with suppliers. We work with our suppliers to support their compliance and may act against those that do not demonstrate sufficient commitment to the Code or are in breach of them.

With regard to our own labor practices, we expect all employees to comply with all applicable laws. Edgewell has developed an Ethics and Compliance Program to help ensure that our standards are met. Under our Program, we conduct periodic audits of various business units and activities, as well as of other Edgewell programs.

A confidential telephone number and web address have been established to allow employees and individuals in our operations or direct supply chain to confidentially and anonymously, as permitted by applicable law, report violations to our policies. All reports are promptly investigated in good faith and any discharge, demotion, suspension, threats, harassment, or other retaliation or retribution as a result of a good faith reporting of a potential violation of law or of our standards of conduct will not be tolerated.

Supply Chain Due Diligence

We have reviewed our suppliers and assessed the key ones in more detail to ensure that they have appropriate policies in place to minimize the risk of slavery and human trafficking in their business. Specifically, our key suppliers have each represented and warranted that they comply with all slavery and human trafficking laws of the country or countries in which they do business including, but not limited to the Acts, and do not engage in slavery or in human trafficking of any kind, including but not limited to the recruitment, harboring, transportation, solicitation, provision or acquisition of persons for labor or services through the use of force, fraud or coercion.

Based on our review, we are satisfied that our key suppliers have appropriate policies in place.

During fiscal year 2020, we did not identify any instances of human trafficking or modern slavery in our direct supply chain.

Evaluation of Modern Slavery Risk of Our Suppliers

Edgewell carries out routine due diligence checks on material suppliers and routinely screens all third-parties, including suppliers, against compliance information databases that include human trafficking and modern slavery information. Due diligence and monitoring is ongoing and under review to improve supplier vetting and to further minimize a range of risks, including modern slavery and human trafficking. This is led by our procurement team, assisted by our legal team. Our procurement team also looks to foster long-term relationships with suppliers, through which policies aimed at minimizing a range of risks (including the risk of modern slavery and human trafficking) can be advanced. Edgewell reserves the right to terminate relationships with suppliers who do not conform to the requirements of applicable law and our Code.

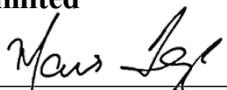
Training

We will continue to work to embed respect for human rights and zero tolerance of modern slavery across our business; to strengthen the education available to our employees and business partners on the risks, policies and standards related to modern slavery, human trafficking and forced labor; and to develop awareness-raising tools for our company and our direct supply chain.

Approval

This statement has been approved by the board of directors (or equivalent management body) of each of the entities named below and signed by a director (or equivalent) of each of these entities effective February 11, 2021, for the fiscal year ending September 30, 2020.

Bulldog Skincare Holdings Limited


By: Marisa Iasenza
Title: Director

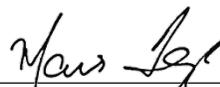
Bulldog Skincare Limited


By: Marisa Iasenza
Title: Director

Edgewell Personal Care Holdings UK Ltd.


By: Marisa Iasenza
Title: Director

Edgewell Personal Care UK Limited


By: Marisa Iasenza
Title: Director

Edgewell Personal Care Investments UK Ltd.


By: Marisa Iasenza
Title: Director

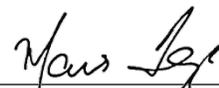
Personna International UK Limited


By: Marisa Iasenza
Title: Director

Wilkinson Sword Limited


By: Marisa Iasenza
Title: Director

American Safety Razor Australia Pty. Limited


By: Marisa Iasenza
Title: Director

Edgewell Personal Care Australia Pty. Ltd.


By: Marisa Iasenza
Title: Director