

Code of Conduct





Rod Little
CEO, Edgewell Personal Care

At Edgewell, we are committed to doing the right thing

At Edgewell, our reputation as a People First organization is built on trust – with our teammates, our consumers, our customers, and the communities we serve. That trust depends on each of us choosing to do the right thing, every time.

This Code of Conduct is not just a set of rules. It's our commitment to acting with integrity, complying fully with the laws and regulations that apply to our work, and upholding the highest ethical standards in every decision we make. It outlines our policies for creating a safe and inclusive workplace, following the law, operating with integrity, and delivering the highest-quality products to our customers and consumers.

You, our teammates, bring this Code to life. You set the tone by speaking up when something doesn't feel right. If you ever have a question or concern, use the resources outlined in this Code. When you raise an issue in good faith, you have my assurance that you will be supported. Retaliation has no place at Edgewell.

We are determined to innovate and compete. We are moving forward and adapting to a world that never stands still – but let me be clear: no business goal is ever more important than our integrity. We do not cut corners. We do not excuse unethical conduct, “for the good of the company.” We win the right way – together.

Thank you for reading this Code carefully and for living it every day. By doing so, you help ensure Edgewell's future as a responsible, successful company that brings joy and trust to everyone we serve.



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Our Values

Why We Have a Code

Our Code is a statement of our shared values that helps us operate openly, honestly, and ethically. Our Code is the cornerstone of our compliance program and guides us to win in business with integrity. Though it does not offer an answer for every situation, the Code, and the resources it references, provide the guidance and information you need to make ethical decisions. Refer to it often in your work, use good judgment, and always seek further guidance if you need additional assistance.

The Code applies to each Edgewell subsidiary, and when we refer to “Edgewell,” the “Company,” “we,” “us,” or “our,” we mean the member companies of Edgewell, both individually and collectively. We expect all of our employees, officers, agents, contractors, and anyone else acting on the Company’s behalf (collectively, “Teammates”) to behave in an ethical manner and to comply with the letter and spirit of this Code. We expect the same of our suppliers, vendors, and similar business partners and communicate these expectations to them through the Company’s “Supplier Code of Conduct” (“SCoC”). This Code is to be read together with all other Company policies and procedures.

How our PVB Informs Our Code

Our “Purpose, Values and Behaviors (“PVB”), “People First,” “Own it Together,” “Listen Up and Speak Up” and “Move Forward,” are foundational to our purpose and govern our

collaborations with our colleagues, our partnerships with our customers, and our connection to our consumers.

Edgewell relies on the Code to support its absolute commitment to the highest standards of ethics and legal compliance. Teammates, suppliers, and other business partners are expected to conduct themselves in a manner that advances our PVB.

Our Code is designed to demonstrate Edgewell’s commitment to preventing and detecting misconduct and ensuring that our activities comply with all applicable laws, rules, and regulations. This Code represents a major component of our compliance program as it informs Teammates of our expectations and provides guidance to help us do the right thing when acting on the Company’s behalf.

We have a responsibility to ourselves and to our Teammates to conduct business legally and ethically. We must be alert to activities going on around us and speak up if we suspect illegal or unethical conduct by any Teammate, vendor, supplier, or customer. We also want to develop relationships with stakeholders who share our values and ethical standards. Before you establish a relationship with a new stakeholder on behalf of Edgewell, you should satisfy yourself that the stakeholder is committed to demonstrating the highest standards of ethical business conduct. If you suspect at any point that a stakeholder is falling short of this expectation, or if you believe that the relationship is not consistent with goals set forth in any of our other policies (e.g., our SCoC or Anti-Corruption & Anti-Bribery Policy) contact the Legal Department.



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 forge meaningful relationships. Our accomplishments come from our people, so we find joy in celebrating each other whenever we can. And because we care deeply for our people and our communities, we invest in them in ways both big and small.

MOVE FORWARD

We think proactively, continually setting bold and ambitious goals both individually and as a team. As we are not afraid to take smart risks, mistakes are sometimes inevitable. That's OK. We learn from our mistakes and move forward with confidence, and continue to innovate and improve. We recognize our past successes and failures and take pride in our resiliency.

OWN IT TOGETHER

We bring ideas to life by balancing individual ownership with working in teams large and small. At every level, we use our imagination, without needing a nudge. While we take joy in collaborating, as we know teamwork leads to great things, we're always personally accountable ourselves. We delegate and empower our teams to lead and finish strong, so that our innovative ideas become a reality.

LISTEN UP AND SPEAK UP

We create an environment in which good ideas can thrive, so our business does too. We share honest, compassionate feedback and helpful insights so that we move forward stronger together. 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, change and learning.

Although this Code and the policies it references address some of the most common compliance concerns, it cannot address every situation or replace expert advice. Ethical issues are often ambiguous and highly dependent on context. What seems like a minor detail could mean the difference between a permissible activity and an illegal one.

We pride ourselves on maintaining an environment where Teammates are confident that they can speak up when they suspect something is wrong. If you are unsure about whether doing something is ethical, legal, or proper, stop and ask for help from any of the following resources:

- I. Your manager, department head, or any member of Edgewell management;
- II. Any member of People Team;
- III. The Legal Department;
- IV. Internal Audit; or
- V. The Employee Relations COE.

Teammates can have confidence that, if they ask questions about the Code or seek guidance from any of these resources, they will receive a response, and they will not be subject to retaliation.

At Edgewell, we pride ourselves on continually setting bold and ambitious goals both individually and as a team. However, we must never allow the pursuit of ambitious business goals to interfere with our commitment to ethical conduct.

By following our Code, as well as our core values and the principles that inspire them, we can establish and maintain an ethical culture that enables us to continue to improve and innovate while demonstrating honesty and integrity in everything we say and do.

What We Expect From Every Teammate

- a. Integrity and an absolute commitment to the highest standards of ethics and legal compliance;
- b. Familiarity with this Code, our policies, and the resources available to help ensure your conduct exemplifies our PVB at all times;
- c. Accountability, transparency, and support for each other's work;
- d. Setting a good example for others and demonstrating our values through your words and actions on a daily basis;

- e. Be alert to activities going on around us and speak up if you suspect illegal or unethical conduct by any Edgewell Teammate, vendor, supplier, or customer; and
- f. 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.

Additional Expectations for People Leaders and Managers

- a. Appropriate supervision and vigilance to identify situations or actions that may violate the letter or spirit of the Code, violate an Edgewell policy, or potentially damage Edgewell's reputation;
- b. Prompt and thorough responses to reports, observations, or reasonable suspicion of conduct that is unethical, illegal, or potentially damaging to Edgewell's reputation;
- c. Full compliance with all prohibitions of retaliation 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 a government entity, and clear, consistent, communication to others of our "Zero Tolerance Policy" for retaliation; and
- d. Follow through to ensure that concerns about potential misconduct have been appropriately addressed or escalated.

What You Can Expect From Edgewell

For the Company's part, Edgewell will strive to do all it can to be an organization we feel proud to work for and support. To that end, you can expect from Edgewell:

- a. An absolute commitment to ethical behavior, integrity, and honesty in everything we do;
- b. That we will, at all times, be mindful of not only what we do, but how we do it;
- c. Continuous efforts towards improvement to ensure that our Code reflects the world we operate in, any heightened compliance risks, lessons learned from mistakes, and the new challenges Teammates face;
- d. A commitment to supporting our Teammates and stakeholders when they raise good-faith concerns regarding Edgewell's ethical commitments;

- e. A prompt and appropriate response to reports of potential violations of applicable law, this Code, or Edgewell policies;
- f. A commitment to our Zero Tolerance Policy that prohibits 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; and
- g. A commitment to working with organizations that share our values and agree to uphold ethical business practices.

How to Use the Code

No code of conduct can cover every business situation that may require an ethical or legal decision. Consequently, if you suspect that a Teammate, supplier, vendor, or any other business partner is behaving illegally or unethically, you are responsible for seeking guidance regarding our Code, Edgewell policies, and applicable laws. Speaking up and seeking advice is not a responsibility that can be delegated to others. If you have questions about the law, our Code, or our policies, or if you face situations not specifically addressed in our Code, seek advice from your manager or local supervisor, Human Resources, the Legal Department, or Internal Audit before taking any action unless an immediate threat to some-

one's life, health, or physical safety makes getting guidance in advance impossible (in which case you should use your best judgment and seek further guidance as soon as possible).

Speaking Up: Asking for Guidance and Voicing Concerns

While every teammate should be confident that you can come forward and raise potential concerns, the Company has also established a confidential telephone number and web address 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. Thus, in addition to the internal resources referenced above, you also can report your concerns relating to issues covered by this document, confidentially and anonymously, 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.

Any reports made, whether anonymous or not, should include as much detail as possible to allow the Company to investigate the matter appropriately. Regardless of who you contact to make a report of potential misconduct, your



concern will be handled promptly, thoroughly, and consistent with applicable law. Investigations, and the identities of those involved, will be kept confidential to the extent possible. We will act appropriately based on the findings of an investigation. The Company may maintain the confidentiality of such reports to the extent circumstances permit.

Zero Tolerance Policy for Retaliation

We pride ourselves on maintaining an environment where Teammates are confident in speaking up when they suspect something is wrong. This means that retaliation is not tolerated.

Retaliation includes, but may not be limited to, taking a negative employment action against a person because they (i) reported in good faith actual or suspected misconduct to Edgewell or the government (ii) participated in or cooperated with an Edgewell or government investigation, or (iii) engaged in some other similar lawful and protected activity. Negative employment actions can include, for example, 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, (f) negative impact on salary or benefits or (g) any other action that dissuades or discourages Teammates from speaking up about potential legal or compliance issues. This does not mean, however, that managers cannot take appropriate employment-related action, including disciplinary action or performance management, in the usual scope of their duties and based on valid performance-related factors. Rather, it means that such actions cannot be based on a Teammate having raised a concern in good faith or participated in an investigation.

As a company, we do not tolerate retaliation against anyone who raises an issue or concern in good faith, participates in an investigation, or otherwise exercises their lawfully protected rights, 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 has been retaliated against, report the incident immediately to any of the Edgewell resources identified in the Code.

People First

As a people first organization, everyone has an opportunity to contribute meaningfully. We use our daily interactions to build relationships and an environment that celebrates individuality and belonging.

As a People First organization:

- i. We are committed to fostering a culture of inclusion; and
- ii. we value diversity as a strength because we know diverse perspectives ignite creativity and deliver great results.

Creating a Secure Work Environment

We are committed to fostering an open and inclusive work environment where people are joyful about coming to work and feel comfortable and safe expressing their individuality. We have zero tolerance for discrimination in any form and seek to create ways to move forward in a way that is governed by equity, fairness, and trust. Creating a secure work environment means:

- Following applicable environmental, health, and safety policies, guidelines, regulations, and laws;
- Protecting the environment and the communities in which we operate and conduct business;
- Not working under the influence of illegal drugs, controlled substances, or any other substance that could compromise safety or performance (though appropriate accommodations for medical conditions may be made in some circumstances that do not pose risks for harm);
- Not feeling pressured or pressuring others to consume



alcohol at work events or with work colleagues; if you do consume alcohol at a work event, please do so responsibly;

- Complying with Company policies related to travel and leveraging Company travel management processes;
- Exercising good judgment and promptly reporting concerns about Teammates or visitors exhibiting behavior that could be a sign of threats or acts of violence;
- Complying with Company policies related to physical security, including visitor access to facilities and use of Edgewell badges; and
- All Teammates are prohibited from sending, reading, or composing text messages, emails, instant messages, or any other form of electronic communication on any handheld or other electronic device while operating a Company-owned or company-rented vehicle, a government-owned vehicle, or a personally owned vehicle when on Company business. Teammates may only do so when they are legally and safely stopped and parked. No one may send text messages, emails, or otherwise use any cell phone or other device in a manner that might distract them while operating any vehicle during the performance of any Edgewell-related task.

Non-Discrimination Policies

Edgewell 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 applicable U.S. federal, state, and local 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; or
- Any other trait protected by law.

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.

We Do Not Tolerate Any Form of Harassment

Every Teammate has the right to work in an environment free of harassment. We are a global company, and Edgewell will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of our Teammates.

Harassment can take many forms, including unwelcome verbal, visual, or physical conduct directed towards someone because of their actual or perceived membership in a legally protected class. The harasser can be a supervisor, co-worker, or anyone in the workplace, such as a customer, vendor, or visitor. While the legal definition of harassment varies by location, harassment always has the purpose or effect of creating an intimidating, hostile, humiliating, or offensive work environment. Regardless of how the law views the conduct, we consider the following non-exhaustive list to be unacceptable under the Code:

- Epithets, slurs, or negative stereotyping;
- Degrading comments, written, or graphic material;
- Jokes of a racial, offensive, or insensitive nature; or
- Hostile, intimidating, or threatening behavior directed at someone because of their membership in a protected class.

Sexual harassment is a particular form of discriminatory harassment that can occur between any individuals, regardless of their sex or gender. Sexual harassment can take many forms, including:



- Sexual advances;
- Requests for sexual favors;
- Jokes with sexual or harassing overtones;
- Inappropriate comments about one’s appearance, based on sex or gender;
- Display of sexually suggestive pictures or pornography; or
- Unwanted touching.

Any form of discriminatory harassment – including online harassment – is a violation of our policies (e.g., our Global Social Media Policy and Human Rights Policy) and potentially the law, and could subject the Company, as well as the harasser, to liability. Remember that harassment is determined not by your intentions, but by your actions and how they impact others. You must never engage in conduct that could cause others in the workplace to feel uncomfortable.

If you believe you have been subject to, or become aware of, unlawful harassment or discrimination, you must either notify a member of Company management, HR, Legal, the Compliance COE, Internal Audit, or the Employee Relations COE, or you can raise your concerns anonymously through EthicsPoint, the Company’s third-party compliance hotline.

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

Health, Safety, Environmental and Sustainability Policies

Edgewell is committed to protecting the environment, health, and safety (“EHS”) of our employees, customers, and the global communities where we operate. 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.

Across Edgewell, our team’s work is guided by a comprehensive set of Health, Safety, Environmental and Sustainability (“HSES”) policies and standards that cover a range of HSES topics such as waste, water, air, management systems and reporting, and machine safety, among many others. These are aligned with industry best practices and legal, regulatory and customer requirements. Our framework provides a systematic and consistent approach with the goal of driving positive change and taking appropriate steps toward significant, lasting improvements.

When possible, we aim to perform above and beyond EHS regulatory requirements, laws, and globally recognized standards. All our manufacturing facilities must implement and maintain EHS management systems consistent with the requirements of the globally recognized International Organization for Standardization (“ISO”) 14001 and 45001 standards. These standards require that facilities maintain robust systems for managing and controlling environmental impacts, safety risks and hazards. Facilities are internally audited, measured and scored against our policies and standards, with a focus on compliance and continual improvement.

Each of us must put safety first. We expect you to:

- Comply with all applicable health and safety laws and regulations, as well as Edgewell’s own internal requirements;
- Perform all work with a commitment to eliminating or mitigating health and safety hazards or impacts;
- Look out for the safety of your colleagues and those around you; and
- Immediately put a stop to any unsafe or unhealthy activity, and report unsafe conditions to your supervisor.

Workplace Safety

Edgewell does not tolerate threats and violence. The safety of our employees and those in our workplace is of paramount importance. Acts or threats of violence in the workplace—whether that conduct occurs on company premises or offsite while an employee is working on behalf of Edgewell—will not be

tolerated. Threatening behavior is never acceptable. You must never engage in any activity that could cause someone to feel threatened or unsafe. This includes verbal assaults, threats, or any expressions of hostility, intimidation, or aggression. You are also prohibited from possessing weapons while on Company property or working offsite. Weapons include guns, knives, explosives, and other items with the potential to inflict harm. Be alert to your surroundings and speak up about threats of violence. If you or a Teammate are faced with an imminent threat to your safety, contact local law enforcement immediately and then report the incident internally.



Accessibility

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

You must 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 Business Partner or the Legal Department.

Privacy

Consumer and regulatory concerns about protecting sensitive data have resulted in passage of data privacy laws and regulations that include penalties to enforce them. Edgewell is committed to respecting people's privacy. Data is one of the most important assets a company has. Transparency about how consent is requested, compliance with privacy principles and policies, and appropriate management of data is vital to building trust and accountability with consumers, customers, and business partners.

Personal information must be collected, securely processed, and used in accordance with Edgewell's values, applicable laws, and respect for privacy as a human right and only if use of the data is necessary to fulfill a lawful or legitimate purpose.

Teammates and business partners must follow privacy by design principles in new projects and immediately report any personal data breach.

Teammates and third parties accessing any personal information must review and follow Edgewell's privacy practices, policies, and processes, including the Teammate Privacy Notice and remain mindful of the ways Edgewell collects, uses, shares and stores people's personal information, including in our products and operations—and how we handle and protect that information once we have it.

Within the meaning of applicable legislation, personal data, or personally identifiable information ("Personal Information") means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be directly or indirectly identified by reference to information such as a name, email address, identification number, online identifier or to one or more factors specific to the physical, psychological, genetic, or cultural identity of that person.

You must not collect, access, use, retain or disclose Teammate Personal Information, except as permitted by law and pursuant to relevant and appropriate business purposes. You must not share this information with anyone, either inside or outside Edgewell, who does not have a legitimate business need to know. In addition, you must take steps to properly secure such data at all times from unauthorized access. You also must inform employees about the Personal Information that is being collected about them and how it will be used.

Edgewell is committed to maintaining consumer trust by protecting the privacy and security of consumer Personal Information. Laws governing the collection and use of consumer Personal Information vary by geography. These laws may apply

to particular data types, kinds of consumers, types of data processing, or communication channels.

For more information on how Edgewell handles and protects Personal Information, review our Website Privacy Policies, Teammates Privacy Notice and Data Classification Policy.

Own It, Together

Compliance with Laws

Obedying the law, both in letter and in spirit, is the foundation of Edgewell's ethical standards. All Teammates are expected to respect and obey the laws of the jurisdictions in which Edgewell operates. While it is no small task to know the details of those laws that may affect Edgewell's daily business operations, Edgewell's policies provide important guidance in making decisions. Please refer to the "Policy Links" section in this Code for links to the various policies currently in place.

Insider Trading

Never buy or sell Edgewell securities or any other company's stock if you are aware of information that has not been publicly announced and that could have a material effect on the value of the securities. It is illegal and against Edgewell policy to give anyone, including friends and family, tips on when to buy or sell securities when aware of material non-public information concerning that security. This applies to decisions to buy or sell Edgewell stock or the stock of an Edgewell supplier, manufacturer, vendor, or customer. If you learn secret information that relates in any way to your role at Edgewell, you may not use that information to trade or share it with others.

Information is material if it would likely be considered important by an investor who is deciding whether to buy or sell a security, or if the information is likely to have a significant effect on the market price of the security. Both positive and negative information may be considered material. Examples of potential material information include financial results, information about new products or significant features, timing of significant

product announcements or new product introductions, news of a pending or proposed acquisition or other corporate transaction, significant changes in sources or availability of supplies, changes in dividend policy, and significant cybersecurity, or other data protection or privacy incidents.

For guidance on what constitutes material non-public information and other rules about trading, review our Insider Trading Policy.

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 Edgewell.

Confidential information includes personnel data maintained by the Company, customer and supplier lists, pricing and cost data, and 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.

Although you may use confidential information in the performance of your job, you may not

disclose this information to anyone outside Edgewell without specific authorization and agreement from the outside party to maintain the confidentiality of the information. Within Edgewell, you must only discuss this information, on a strictly "need to know" basis, with other Teammates who require the information to perform their jobs.

Disclosing (or "leaking") confidential information outside of Edgewell or to those who do not need it for legitimate business purposes can have significant consequences for Edgewell's business and could be illegal. For example, leaks could expose Edgewell to liability or give away product strategies to compet-



itors; they could also result in lawsuits or undermine the work, or even safety, of our colleagues. Sharing Edgewell's confidential information with internal or external parties who have no legitimate need to know such information could also seriously damage Edgewell's reputation and breach the trust of others, including people who use Edgewell services, our colleagues, third parties and the community.

When there is a business need to share confidential information with a supplier, vendor, or other third party, never volunteer more than what is necessary to address the business at hand. Any confidential information shared outside Edgewell must be covered by a non-disclosure/confidentiality agreement (NDA). Teammates must comply with terms of NDAs or applicable agreements when dealing with third-party confidential information, including obtaining express written consent if asked to share third-party confidential information with another third-party. To learn more about NDAs and the NDA process, please contact the Legal Department.

Customers, partners, suppliers, and other third parties may disclose confidential information to Edgewell during the course of business. We are all responsible for protecting and maintaining the confidentiality of any information entrusted to us by our partners. Compromising that trust may damage relationships with our partners and can also result in legal liability.

Edgewell will protect its proprietary and confidential information and trade secrets; but nothing in this Code or any Company policies should be read to discourage employees from cooperating with government investigations, complying with subpoenas, court orders, or similar lawful demands, or otherwise engaging in lawful and protected conduct.

Business Practices

We have a responsibility to ourselves and to our Teammates to conduct business legally and ethically. We will not compromise on our commitment to our PVB for any business opportunity. We will win by selling the best products, not by selling our reputation. To that end, we expect all of our Teammates to be mindful and vigilant about the following policies that govern our business practices:

We prohibit all forms of corruption. We will not tolerate any attempt to gain a personal benefit or business advantage through improper or illegal means such as bribery or anti-competitive collusive activity. Bribery takes many forms, so gifts, political or charitable contributions, and other inducements or benefits may never be given when the intent in doing so is to improperly influence any actions or decisions. We also may not ask or encourage others to engage in actions or transactions

on our behalf that our Code or PVB would prohibit us from undertaking.

As our Company expands its geographical reach, we may be involved in projects in places where bribes and other corrupt practices are viewed as part of regular business practices. You must always adhere to this Code and our Anti-Bribery and Anti-Corruption Policy, regardless of what is considered permissible or customary in that location.

Commitment to the highest standards of ethics and legal compliance means we:

- Comply with the letter and spirit of anti-corruption, anti-bribery, and anti-kickback laws wherever we do business, including the Foreign Corrupt Practices Act ("FCPA") and the U.K. Bribery Act;
- Never offer bribes, kickbacks, facilitation payments, or



anything of value, to an individual or government official to improperly influence—or if it could appear to improperly influence—a business or government decision;

- Never offer, provide, or accept gifts or entertainment when doing so would improperly influence, or even appear to improperly influence, a business or government decision;
- Refuse all offers of bribes, kickbacks or any other payments or benefits intended to improperly influence how we make decisions at Edgewell.
- Know enough about the people we do business with to determine whether they are government officials;

Money Laundering

Money laundering is the process by which the proceeds of a crime are converted into assets which appear to have a legitimate origin. We all need to be vigilant towards potentially suspicious transactions and illegal activity by others so that we can protect Edgewell and ensure the Company is not used as a vehicle to launder money.

Take care to avoid potentially suspicious transactions, relationships, business practices, and behaviors, and be mindful of common warning signs when working with business partners including:



- Properly review and select ethical, trustworthy, qualified third parties, and never use them to do anything improper;
- Make hiring decisions based on a candidate's qualifications, knowledge, skills, and abilities—never to secure an improper advantage or for an improper reason, such as benefiting a customer or government official; and
- Create and maintain accurate books and records and effective internal controls.

Requests for payment to accounts in jurisdictions with no connection to the relevant transaction;

- Connections to public officials;
- Cash requests or other unusual payment terms like requests to receive or pay funds into or from multiple bank accounts or through a third party;
- Limited relationship history and experience;
- Questionable expense reimbursement requests;
- Payments to numbered accounts;

- Refusal to enter into written agreements;
- Obscured ownership structures;
- Inadequate staff to perform duties;
- Excessive reluctance to provide standard personal or business background information; or
- Overpayments or payments in a different currency to those of the invoice.

You must follow procedures to determine the entity and legitimate operations of our business partners and must maintain procedures to prevent the acceptance of suspicious payments.



Customer records and profiles must be kept up to date and you must only do business with partners on whom we have carried out adequate due diligence to know the counterparty and how they use our products and services.

As detailed further below, we also comply with applicable laws on doing business with persons and entities that are subject to sanctions (e.g., we do not engage in transactions with persons and entities on the [U.S. Treasury Department's list of sanctioned, blocked, and politically exposed persons](#)). For more information, see our Anti-Bribery and Anti-Corruption Policy and the SCoC.

Antitrust

We comply with applicable antitrust laws of the countries and states where we operate.

Antitrust laws are intended to protect free and vigorous competition at all levels of the supply chain. Agreements and practices intended to restrict competition or abuse a dominant market position are generally unlawful.

Edgewell must compete independently from other market players and avoid coordination with competitors intended to avoid or reduce the uncertainty of the marketplace.

Teammates shall not enter into any understanding or agreement, express or implied, with any competitor regarding: a) prices or output; b) terms of sales or purchases; c) allocation of business markets, territories, customers, or suppliers; d) the exchange of confidential or commercially sensitive information; or e) refusal to deal with or boycott any customer or supplier.

Examples of unlawful activity when interacting with competitors include:

- Price fixing
- Market sharing
- Bid rigging (coordinating tenders)
- Labor market agreements
- Exchanges of confidential and commercially sensitive information

Trade associations are a legitimate venue for market participants to discuss industry trends and issues, including legislation and regulation. Trade associations do, however, present the risk of facilitating intentional or inadvertent exchanges of competitively sensitive information amongst competitors. Vigilance is required when attending trade association meetings in order to comply with applicable antitrust laws and Edgewell policies.

The principles of antitrust law apply to Edgewell's relationships with its customers, i.e., retailers, distributors, and wholesalers. Customers must be free to determine their commercial strategies, such as the following, independently:

- Resale price maintenance;
- Restrictions on resale territories or customers; and
- Sales of competitors' products.

You must ensure that communications, including meetings, conversations, and exchanges of information with competitors, retailers, and customers that may touch upon competitive matters are approached with considerable caution and only with the advice and approval of the Legal Department.

Conflicts of Interest

A conflict of interest may exist any time a Teammate's personal interests might interfere or compete with duties the Teammate owes to the Company. This Code generally prohibits Teammates from engaging in activities that might prevent them from objectively acting in the Company's best interests as such conduct may damage Edgewell's reputation or financial interests or may give the appearance of impropriety or divided loyalty. Although in some circumstances exceptions may be appropriate, unless you obtain advance approval from the Legal Department, you must generally avoid situations and transactions that create a real or perceived conflict of interest. If you are unsure about a potential conflict, talk to your manager or any member of Edgewell management, your HR Business Partner or any member of HR, the Legal Department, Internal Audit, or the Employee Relations COE. Members of Edgewell's Board of Directors must follow the requirements and procedures described in the Edgewell Board of Directors Code of Conduct.

While a conflict of interest could arise in any situation in which outside activities or personal interests could influence, or appear to influence, your ability to make objective decisions in the course of your Company job, the following are common situations Teammates may encounter.

Significant Personal Relationships

Personal relationships in the workplace can present a real or perceived conflict of interest when one individual in the relationship is in a position to make or influence employment decisions regarding the other, including, but not limited to, decisions about performance assessments, compensation, discipline, and/or career advancement and development. Significant personal relationships include, but are not limited to, spouses, domestic partners, family members, dating or physical relationships, close friendships, and outside business or financial relationships unrelated to Edgewell.

Edgewell business relationships include, but are not limited to, vendors, customers, suppliers, contractors, temporary agency workers, or similar relationships. Do not conduct Edgewell business with family members or others with whom you have a significant personal relationship. Do not use your position at Edgewell to obtain from Edgewell business partners personal benefits or favorable treatment for yourself, family members, or others with whom you have a personal relationship. This prohibition applies to transactions like product purchases or sales, investment opportunities, hiring decisions, promotions, contracting opportunities, lending arrangements,

and any similar business or financial matters. If you believe that a family, business, or personal relationship may create an actual or apparent conflict of interest, disclose it to your manager and your HR Business Partner to review and address. You must not allow any relationship to disrupt the workplace or interfere with your work or judgment.

Conflicts of Interest and Outside Activities

Generally, you may participate in outside activities, including secondary employment, businesses, inventions, and serving on boards, only if they do not present a conflict of interest under the guidelines set forth above, and you adhere to the rules set out below.

Edgewell generally considers an outside activity to be a conflict of interest if it:

- Is for a business, company, or organization that makes or sells products or services that compete with Edgewell's, or that Edgewell reasonably anticipates providing.
- Generates or exposes you to intellectual property that competes with or relates to Edgewell's present or reasonably anticipated businesses, products, or services.
- Would require you to disclose or use confidential Edgewell information and/or to use Edgewell assets—including, for example, Edgewell workspace, phones, computers, Internet access, printers, and photocopiers. While reasonable personal use of these assets by teammates is not itself a conflict of interest, outside activities that depend on or require regular use of Edgewell assets would present a conflict of interest under the Code.
- Arises from your role in Edgewell's business relationship with the organization.

An outside activity that is the same as or similar to your role or work at Edgewell, that otherwise may impair or limit your ability to perform duties you owe to Edgewell, and/or is expected to be done on a full-time basis at the same time you are working full-time for Edgewell, could also be considered a conflict of interest. Work with your manager, HR Business Partner, and the Legal Department to evaluate a potential conflict of interest and utilize any digital conflict of interest disclosure tools or processes which may be implemented by the Company from time to time.

If an outside activity is deemed to present a conflict of interest or if an outside activity you are interested in pursuing may present a conflict of interest, you must coordinate with your

HR Business Partner and the Legal Department to seek written approval to participate, which may include conditions to mitigate the conflict and/or added safeguards.

Theft

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, up to and including termination of employment, and the Company may also seek prosecution under applicable criminal laws:

- Using Edgewell funds for personal purchases;
- Falsifying attendance records, padding expense reports, engaging in expense reimbursement schemes, or otherwise claiming funds that you are not lawfully entitled to receive;
- Authorizing checks to be issued to phantom service providers or other personal accounts;
- Selling Edgewell property for personal profit, or profiting off of overcharges to Edgewell; and
- Accepting bribes or kickbacks related to your responsibilities to Edgewell.

Personal Use of Company Resources

Company resources are to be maintained for business related purposes.

You must not use Company property, information, or your 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 must 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 and authorized you to do so. You must 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 and the activity does not otherwise interfere with operations or your duties, is permissible. Any use of Company resources for personal financial gain unrelated to Company business is prohibited.

Complying with International Trade Requirements

Edgewell is committed to respecting and complying with applicable customs, export, import, sanctions, and antiboycott laws.

Teammates must conduct appropriate diligence on proposed relationships with individuals, entities, and countries to mitigate the risk of violating applicable global trade laws and regulations, including those relating to the import and export of goods, services, and technical data to and from the United States and other countries.

Export Controls and Sanctions

Because Edgewell is a U.S. company, its products are subject to both U.S. and local export controls and economic sanctions laws, regardless of your work assignment or location. Export controls and economic sanctions laws affect many Edgewell transactions, including intra-company transactions; technology transfers; and transactions with other parties, including clients, suppliers, and original equipment manufacturers. Before Edgewell products can be exported, re-exported, or delivered anywhere, Edgewell must validate that it has the authorization to provide those items under U.S. and applicable non-U.S. export and sanctions laws. All Edgewell business must comply with the [U.S. Export Regulations Program](#).

Imports

Edgewell must also comply with all import laws, regulations and requirements when engaging in international trade. In addition to the cross-border movement of physical items, import implications may result from other activities, such as:

- Change in manufacturing location, processes, or source of supply.
- Client activity requiring cross-border delivery.
- Shipment of marketing samples or prototypes cross-border.
- Calculation of product intra-company prices for sales to an Edgewell location in another country.
- Determination of product country of origin.
- Maintenance of accurate data and records for product inventory, sales, and shipment.

Anti-Boycott Laws

Edgewell, its subsidiaries and affiliates, and their agents are prohibited from complying with or supporting a foreign country's boycott of a country that is friendly to the United States. Edgewell is required to report promptly to the U.S. Govern-

ment any request to support a boycott or to furnish information regarding a boycott. If your role at Edgewell calls for you to address such issues, be sure to familiarize yourself with the Company's Anti-Boycott Laws and Regulations Policy.



Listen Up and Speak Up

Financial Reporting and Records

Having clear, complete, and accurate records is critical to our operations and reputation. Our records tell us how our business is doing, inform the everyday and long-term strategic decisions we make, and help us fulfill our commitments to our clients, employees, business partners, and other stakeholders. Keeping accurate records is a responsibility that all Teammates and departments share. In every company record you prepare, you must be honest, careful, and thorough.

U.S. securities laws require us to keep accurate books and records that fairly reflect all transactions. If, for example, a bribe or other unauthorized transaction is falsely entered into a company's books and records as a legitimate payment, that false entry may itself be an illegal act. Indeed, when regulatory authorities do not have sufficient evidence of a specific criminal act, they may instead prosecute a company for violating recordkeeping requirements related to the transaction. Therefore, keeping detailed, accurate, and transparent records is critical. Falsifying Company records, attempting to conceal a transaction, or otherwise failing to record a transaction or expense accurately will not be tolerated and may result in criminal prosecution.

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.

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.

The same laws also require Edgewell to use policies, procedures, and accounting controls that provide reasonable assurance that the Company's financial transactions were properly authorized. Accordingly, Teammates who enter into contracts or agreements on Edgewell's behalf must have proper authorization to do so, including appropriate legal review, prior to the execution of any such documents. Efforts to "get around" or circumvent our financial procedures and controls may also result in criminal liability.

Records Management

Teammates are responsible for storing and disposing of documents, including email and other electronic documents, in accordance with our data classification, management and records retention policies. Proper retention of original records is required for the company to comply with the law, internal or independent audits, other investigations, and our contractual commitments.

Edgewell owns all records and information in any form, such as electronic or paper, which are created or received in the course of doing Edgewell's business. Certain records must be kept because the information meets specific criteria and those are identified in the Edgewell Records Retention Schedule. Examples include corporate tax documents, financial statements, design documents, and personnel records.

Privacy, product safety or other applicable laws may dictate how long these records can be retained. At times, Edgewell will need to retain records and information beyond the normal retention period for legal reasons or audits. If records, data, and information are subject to a "legal hold," "preservation directive," "document retention directive," or similar directive, you must not alter, destroy, remove, or delete them in any way. The Legal Department will notify you of any legal holds you may be subjected to and what is required.

For more information, see the Edgewell Record Retention Policy and Schedules.

Social Media and Other Online Activity

Social media includes many forms of electronic communication, such as websites for social networking, through which users create online communities to share information, ideas, personal messages, and other content. Over the last two decades, social media has become pervasive in many aspects of life, including business. How individuals affiliated with Edgewell use social media can affect Edgewell and its brands and expose the Company and individual Teammates to business, reputational, or legal risks.



Edgewell has established a Global Social Media Policy to govern the use of social media by all Teammates, contractors, and interns. All users are responsible for understanding and complying with Edgewell's Global Social Media Policy and related policies. Teammates whose employment involves the use of social media for specific tasks may be subject to additional, more specific expectations. The Global Social Media Policy is not intended to interfere with an employee's legally protected rights (e.g., the posting or sharing of information relating to the terms and conditions of employment) or to prohibit communications protected by local law.

All Teammates must use good judgment and weigh risks before posting content on social media. When shared on social media, all content must be honest, truthful, and accurate. Harassment or discrimination will not be tolerated. All online behavior must follow Edgewell's PVBs and Code.

Thoughtful use of Social Media should be based on the following principles:

- Do not submit false or misleading consumer reviews for Edgewell or competitive products. Submitting an honest review about personal experience with a product, including the appropriate disclosure of the relationship with the Company is acceptable. If content features other Edgewell Teammates' names or likenesses, it must not be shared without prior consent from those featured;
- Comply with all applicable platform Terms of Service and policies. Follow all local laws and regulations;
- Content must be wholly original and free of unpermitted use of any third-party materials (e.g., we may not use images, video clips, music, or other intellectual property that we do not own or otherwise have a legal right to use). Remember that no social media communication, including private messages, is ever truly private, and any information shared could become public;
- Any posts or comments by Edgewell employees that mention Edgewell, Company business performance, products, or brands may be subject to review by regulators; and
- Edgewell will not continuously monitor Teammates' personal accounts. However, we may review certain accounts or posts based on keywords, tags, mentions, internal reporting of concerns, and/or for other legitimate business reasons as approved by Edgewell's Legal Department.

Be advised that when using Edgewell assets or when using any device you personally own that you connect to any of Edgewell's systems, any telephone conversations or transmissions, electronic mail or transmissions, or internet access or usage of any such assets, devices, or systems may be subject to monitoring at any time and by any lawful means wherever applicable laws permit.

For more information, please refer to the Edgewell Global Social Media Policy.

Communicating Outside of Edgewell

Edgewell strives to provide clear and accurate information to the media, financial analysts, and the general public. In addition to important legal requirements to be clear and accurate, this helps us maintain integrity in our relationships with the public and other external stakeholders, which in turn strengthens our corporate reputation. Because this is so important, Edgewell has designated specific functions and individuals with responsibility for communicating with the media and financial analysts.

Teammates are prohibited from speaking on behalf of Edgewell without prior consultation with a member of the Global Communications Department. Teammates must not speak to outside parties, including financial or investment professionals,

analysts, or stockholders about confidential or sensitive information or intellectual property that relates to our Company, or any financial matters, earnings estimates, or market rumors relating to our Company.

Only specifically designated spokespersons are permitted to speak publicly on behalf of our Company. These include the President and CEO, CFO, COO, and the Vice President – Investor Relations.

Before taking any action, contact the Chief of Staff & Communications or the appropriate Communications manager for the relevant brand or brands about any requests for interviews, external speaking engagements (e.g., conferences and seminars), photographs, films, videotapes, gifts, or information about our Company or products from media representatives, journalists, authors, public relations agencies, and other companies (e.g., our suppliers and retailers). It is prohibited to have "off the record" conversations related to our Company with media representatives.

Government agencies and other regulatory bodies may attempt to contact you from time to time seeking information about our Company. We cooperate with government or regulatory inquiries or investigations, and we expect you to notify the Legal Department before responding, so we can ensure we are responsive to the request and do so in full compliance with applicable laws. While you are generally required to notify the Legal Department of any regulatory inquiry or investigation, this must not be construed to limit your right to communicate with a government agency, to participate in any investigation by a government agency, or to submit a charge or complaint to a government agency, in each case without authorization from or notification to our Company.

Move Forward

We are 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.

Environmental Matters

We are determined to be a positive force in the world – from innovating products, transforming packaging, and reducing our environmental footprint to engaging with our suppliers and championing values of inclusion and belonging. We are committed to growing our business responsibly and doing our part to care for our planet and the people and communities we serve.

We believe in innovating solutions, embracing opportunities, and embedding practices throughout our operations and supply chain that move us forward on our sustainability journey. Our Teammates are key to realizing our goals for reducing greenhouse gas emissions, energy consumption, waste, and water usage across our global operations. At the same time, we remain focused on responsibly sourcing ingredients and materials and engaging with our suppliers to help ensure they uphold our social and environmental standards.

Teammates must conduct Edgewell business in an environmentally sound manner, which means:

- Avoiding an unreasonable adverse impact on the environment;
- Complying with all applicable laws, regulations, and Edgewell policies concerning environmental matters; and
- Cooperating with environmental agencies and regulators.

In addition, Teammates must immediately alert their 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.

Human Rights

We are committed to respecting human rights and promoting sustainable business practices across our entire value chain. We want all our products to contain high-quality ingredients and materials that are sourced responsibly. That is why we work with our suppliers to ensure they understand and uphold our social and environmental standards and treat all workers with

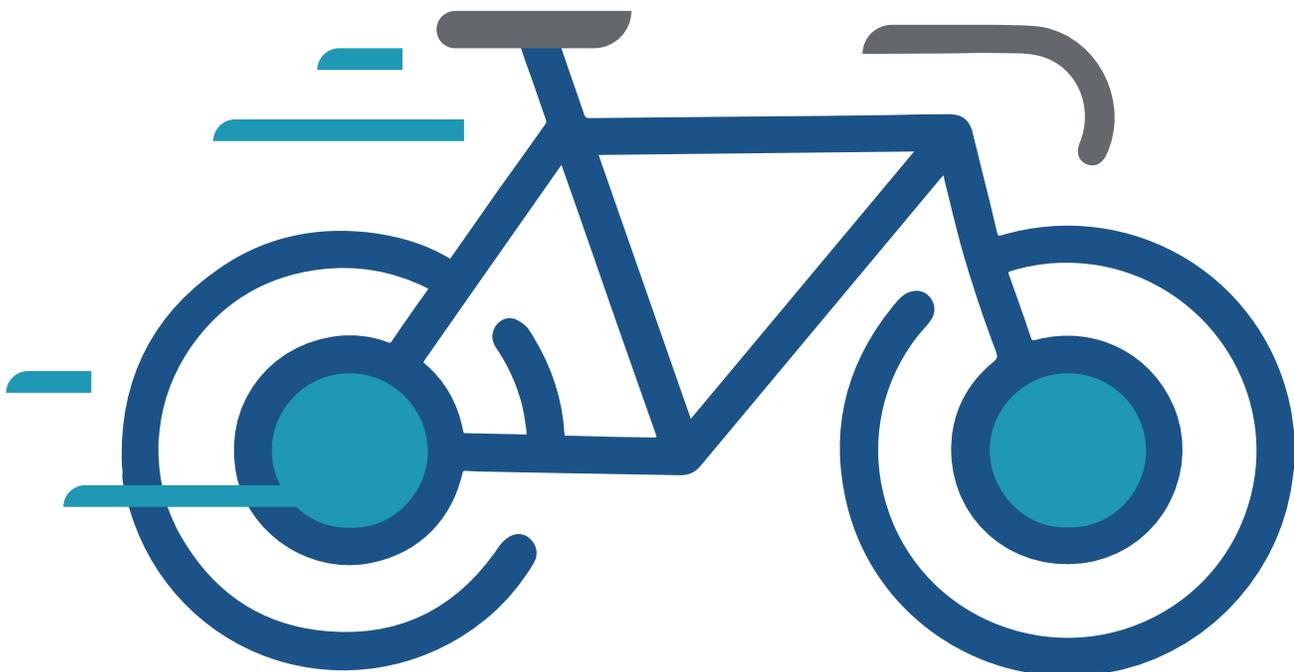
fairness, decency, and respect. We communicate regularly with suppliers, customers, and other stakeholders around our sourcing practices, including supporting customers with their sustainability priorities.

Edgewell strives to promote sustainable business practices. We believe in working with organizations that share our values and expect our suppliers and business partners to uphold ethical business practices. We detail our expectations — and conditions for partnering with Edgewell — in our SCoC. This includes, but is not limited to, standards related to:

- Labor and human rights (including non-discrimination, forced labor, child labor, working hours, wages, benefits, and freedom of association);
- Environmental management;
- Health and safety; or
- Ethics and anti-corruption.

Edgewell does not tolerate modern slavery or human trafficking either in our own teams or those of our suppliers. Additionally, we communicate regularly with suppliers, customers, and other stakeholders around our sourcing practices, including supporting customers with their sustainability priorities. In addition, we monitor progress against our 2030 goals and report annually on our efforts.

For more information, please refer to the Edgewell Human Rights Policy, our Modern Slavery Act Statement, and the SCoC.



Intellectual Property

Edgewell's Intellectual Property ("IP") is among its most valuable assets. IP includes copyrights, patents, trademarks, trade secrets, design rights, trade dress, logos, know-how, and other intangible industrial or commercial property. Edgewell owns the rights to all IP relating to Edgewell businesses that Teammates create, develop, or conceive using the Company's resources. This is true regardless of whether the IP is patentable or protectable by copyright, trade secret or trademark. You must not use this IP in a manner that is inconsistent with Edgewell's ownership rights.

You play a key role in helping us protect Edgewell's IP.

- Watch what you say. Being aware of where you are, who is around you, and what they might see or overhear is an important way we all protect Edgewell's secrets.
- Protect our IP. Keep track of the assets that Edgewell has entrusted to you, and prevent loss, misuse, waste, or theft of those assets.
- Set an example. Model behavior that protects our assets and information at all times.
- Report suspected infringements and unauthorized use of Edgewell's IP to the Legal team. Prompt action can prevent further infringement and protect the company's rights.

You must also respect the intellectual property rights of others. Unauthorized use, reproduction, or distribution of any third-party intellectual property, including trademarks, copyrighted materials, software, and confidential information is strictly prohibited. Your team must seek appropriate permissions or licenses before using or incorporating third-party intellectual property into the organization's work. Any suspected infringement of the intellectual property rights of others must be reported immediately to the Legal team.

Proprietary Information

Teammates may come in contact with information of a confidential, proprietary, restricted, or otherwise sensitive nature ("Proprietary Information"). Proprietary information includes Edgewell's intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Messages, other communications, and any other data or information in any form that you create, send, and receive using Edgewell's devices, e-mail, or other systems or resources are also Edgewell's Proprietary Information. You have no expectation of privacy regarding any materials that are

sent, received, or otherwise accessed using company devices or systems (except where legally required). Where permitted by applicable law, we reserve the right to obtain and review any such Proprietary Information, including from personally owned devices that you connect to Edgewell's systems. Proprietary Information may be encountered in many forms, such as documents, electronic media or even business conversations. All Proprietary Information must be delivered to Edgewell promptly after your employment ceases, or at any other time that we request.

Proprietary Information does not include information that (a) is or that lawfully becomes publicly available; (b) is or becomes known or available to a Teammate from a third party who did not acquire or disclose such information or materials by breach of a duty of confidentiality, or by a wrongful or improper act; (c) is subject to disclosure under applicable law; or (d) is independently developed by a Teammate without reference to the Proprietary Information.

Charitable Contributions

Edgewell has a deep commitment to caring for our communities. Driven by our People First value — which extends beyond our own business — we are dedicated to supporting these vital networks.

Our Teammates play a critical role in our community impact efforts, donating their time, talents, and resources to support the causes they care most about. To encourage and support them in their efforts, Edgewell launched Together We Care — a defined community impact program that covers Teammate donation matching and volunteering. Through Together We Care, Teammates in the U.S., Canada and Puerto Rico can easily identify charities and causes, make donations and volunteer in ways that work for them. We are actively working to provide more structure around volunteer activities globally.

Contributions and Donations are defined as anything of value (cash, Edgewell products, non-Edgewell products, services, use of Edgewell assets or facilities, etc.) made to a charitable or non-profit organization or government entity for charitable or public purposes without seeking any benefit in exchange.

Please refer to the Edgewell Global Financial Policy Manual – Charitable Donations to ensure donations or contributions made by Edgewell align with our PVB, comply with applicable laws and Edgewell policies, are approved by the appropriate personnel, and are correctly recorded in our financial records.

Participating in Public Service and Political Activity

As a good corporate citizen, Edgewell encourages employees to participate in their communities. Your participation in public service may, however, create a conflict of interest. As a board

or committee member of a civic organization, for example, you may be confronted with a decision involving Edgewell, such as a decision to purchase Edgewell products or services, and your interest in Edgewell and your obligation to the civic organization might pull you in opposite directions. Make it clear that you are an Edgewell employee to avoid any perception that you concealed your association with Edgewell and consider abstaining from participating in any decision-making on matters involving Edgewell. Speak with your manager to determine the proper approach if you think your personal activities could create a conflict of interest and seek advice from the civic organization's legal counsel or from the Legal Department, as needed.

Edgewell will not pay you for time spent running for public office, serving as an elected official, or campaigning for a political candidate, unless required by law. Consult with the Legal Department before accepting a political appointment or running for government office at any level.

Edgewell will not endorse, support, or make contributions or payments to any political parties or candidates, including through political action committees, campaign funds, trade or industry associations or similar organizations. For example, Edgewell will not purchase tickets, pay fees, or reimburse expenses for any event where any portion of the funds will be used for election campaigns. Do not make any political contribution as a representative of Edgewell, and do not use work time or Edgewell assets in support of political parties or candidates – using work time or assets would be the equivalent of a contribution. Edgewell will not reimburse you for any personal contributions you make nor expenses you incur in connection with personal political activities.

Other Aspects of Compliance

Conflicts

If the Code conflicts with local laws or regulations, only the Code sections permitted by applicable laws and regulations will apply. Please reach out to the Legal Department if you have questions about Code applicability or conflicts of law. Nothing in this Code or other policies is intended to infringe upon or chill an employee's ability to exercise their rights or to engage in lawful, protected activities. Relevant additional guidance applicable to your region or country should be sought from the Legal Department and may prevail to the extent of any inconsistencies with the guidance linked in the Code. In the event of an inconsistency between the English version of this Code and any version of the Code that has been translated into a different language, the English version will prevail to the extent permitted by law.

Training

Training is essential to ensure that the Code and Edgewell policies referenced in it are top-of-mind in our daily work. It is a forum in which the content in this Code comes to life and it is an important part of each Teammate's engagement with Edgewell's policies. All Teammates must complete assigned trainings, including training on the Code and other Edgewell policies. Failing to complete assigned training undermines Edgewell's ability to meet its legal obligations and could result in disciplinary action, up to and including termination of employment.

The Code Is Not a Contract

Our Code is not a contract. The Code does not create any contractual rights between you and Edgewell, nor does it convey any specific employment rights or guarantee any employment for any specific period of time.

Administering the Code

Edgewell's Compliance Center of Excellence is responsible for developing, implementing, and interpreting our Code and can be reached at compliance@edgewell.com. Postal mail can be sent to the Legal Department at 6 Research Drive, Shelton, CT 06484.

Compliance and Waivers of Business Standards

You will be held accountable for your adherence to this Code. Your failure to comply may result in disciplinary action, up to and including termination of employment. Violations of many 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 must report them as described in this Code. 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, court appearance, or filing with a government agency, you are expected to report such matters immediately, as described in this Code.

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, up to and including termination of employment. Violations may be reported to your supervisor or the supervisor of the Teammate who commits the violation, but they must also be reported to Internal Audit or the Chief Legal Officer or anonymously reported through the phone numbers and web address provided above. 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 this Code.

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 disclosures 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.

Policy Links

[Supplier Code of Conduct](#)

[Website Privacy Policy](#)

[Teammate Privacy Notice](#)

[Data Classification Policy](#)

[Anti-Bribery and Anti-Corruption Policy](#)

[Anti-Boycott Policy](#)

[Record Retention Policy](#)

[Social Media Policy](#)

[Human Rights Policy](#)

[UK Modern Slavery Act Statement](#)

[Global Financial Policy](#)

Helpful Resources

Compliance

For concerns or questions about suspected violations of the Code, law or our policies, contact compliance@edgewell.com.

To report concerns confidentially and anonymously, contact 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.

Global Safety and Industrial Hygiene

For concerns or questions about workplace safety, contact Scott Sutkowski, Global EH&S Manager

Edgewell Communications

For media requests, concerns, issues, or questions related to communications, contact Lauren Medina, Chief of Staff & Communications.

Sustainability, Human Rights and DEI

For concerns or questions about the Company's sustainability, human rights, and Inclusion & Belonging initiatives, contact: Amy Knight, Sustainability Vice President, Alison Jones, VP, Inclusion & Belonging

People Team

For concerns or questions about HR related issues, contact your local People Business Partner.