

ESTÉE LAUDER COMPANIES

SUPPLIER CODE OF CONDUCT

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SUPPLIER CODE OF CONDUCT

OUR COMMITMENT

Dear Valued Supplier,

The Estée Lauder Companies Inc. and its subsidiaries ('ELC', 'we', 'us or 'our') are committed to 'Bringing the best to everyone we touch.' As part of this commitment, we require our suppliers to comply fully with this Supplier Code of Conduct.

ELC was founded on the values of uncompromising ethics, integrity, fairness, diversity and trust. As a condition of doing business with ELC, we expect our suppliers to honour our company values and our commitment to operating as a responsible and sustainable corporate citizen. In partnership with our suppliers and everyone we touch, we are committed to compliance with the law, ethical business practices, fostering our heritage of respect for people and the environment, and serving as a positive influence in the communities we serve and from which we source.

We aim to develop long-lasting, trusting and mutually beneficial relationships with suppliers who share our strong values and demonstrate the same commitment to operating responsibly and ethically across all facets of business.

We recognise that our suppliers operate in diverse legal and cultural environments throughout the world. This Supplier Code of Conduct ('Supplier Code') sets forth the basic requirements we expect of suppliers including vendors, service providers, independent contractors and consultants (collectively, 'ELC Suppliers'), as a condition of doing business with ELC.

This Supplier Code is based on internationally recognised standards, including the Universal Declaration of Human Rights and International Labor Organization's Conventions. The Supplier Code, further detailed herein, consists of the following core principles:

1. ENGAGE IN LAWFUL AND ETHICAL BUSINESS PRACTICES
2. PROMOTE A RESPECTFUL, FAIR AND DIVERSE WORKPLACE
3. PROVIDE A SAFE, HEALTHY WORKPLACE AND PROTECT THE ENVIRONMENT AND COMMUNITY

We truly believe that by conducting business in accordance with this Supplier Code, we are all contributing positively to society and the environment for current and future generations. We thank you for your full support and look forward to continuing to build a foundation of growth and sustainability for all.

Sincerely,



Roberto Magaña
Senior Vice President and Chief Procurement Officer for
The Estée Lauder Companies Inc.

ENGAGE IN LAWFUL AND ETHICAL BUSINESS PRACTICES

1.1 LEGAL COMPLIANCE

ELC is committed to conducting its business in accordance with the highest ethical business standards and in compliance with applicable laws and regulations in the countries where we do business. We aim to meet or exceed requirements of applicable environmental, health and safety laws and regulations, corporate standards and other standards to which ELC subscribes. We expect ELC Suppliers to do the same. In cases where applicable law conflicts with the provisions in this Supplier Code, ELC Suppliers are expected to comply with the law, while seeking to meet the underlying tenets of each standard within this Supplier Code.

1.2 PROHIBITION AGAINST BRIBERY AND CORRUPTION

ELC Suppliers and their officers, directors and employees must adhere to the highest standards of ethical business conduct and must not engage in bribery or corruption in any form, either directly or through third parties. We expect ELC Suppliers to promote anti-bribery and anti-corruption compliance in their organisations through developing their own standards, which should be designed to facilitate compliance with legal requirements, including the U.S. Foreign Corrupt Practices Act.

1.3 IMPROPER GIFTS, HOSPITALITY AND ENTERTAINMENT

ELC Suppliers must not give gifts or entertainment to ELC employees or representatives, that create a conflict of interest or the appearance of a conflict. Modest gifts and hospitality may be permissible so long as they are not provided as a quid pro quo, are modest in value, infrequent, unsolicited, given on a customary gift giving occasion, reasonable and customary in our business, and permissible under the [ELC Code of Conduct](#), the policies of ELC Suppliers' organisation and comply with local laws. Cash and cash equivalents such as gift cards and gift checks are never acceptable. Gifts of tickets for entertainment of any nature (theatre, sporting event, etc.) require that the donor attend the event with the recipient.

1.4 CONFIDENTIALITY AND PRIVACY

ELC Suppliers must respect and safeguard ELC's confidential information (including personal information). ELC Suppliers shall only use ELC's confidential information for the purposes for which it was provided. ELC Suppliers must notify ELC promptly if they become aware of any intentional or unintentional improper disclosure or use of ELC's confidential information. ELC Suppliers must comply with applicable laws and regulations related to the protection and use of personal information.

1.5 FAIR COMPETITION

ELC Suppliers must conduct their business in a fair and ethical manner, and in compliance with all applicable fair competition and antitrust laws.

PROMOTE A RESPECTFUL, FAIR AND DIVERSE WORKPLACE

2.1 CHILD LABOUR AND YOUNG WORKERS

ELC Suppliers must not employ child labour. The term 'child' means any person employed under the age of 15 (or 14 where the law of the country permits) or under the minimum age for employment in the country, whichever is greater. ELC Suppliers employing young workers (workers above the minimum age of employment but under the age of 18) must comply with applicable laws and regulations regarding hours, compensation and must avoid conditions or restrictions that could be harmful to their morals, health, safety and development.

2.2 FORCED LABOUR AND HUMAN TRAFFICKING

ELC Suppliers must not use or benefit from any form of human trafficking, or forced or compulsory labour of any kind, be it prison, bonded, indentured or otherwise. Furthermore, mandatory overtime is not permitted, and workers must be allowed to leave their employment after giving reasonable notice. Imposing monetary fines, withholding identity papers (such as passports), work permits, remuneration or requiring recruitment deposits or other constraints as a condition of employment, is not allowed.

2.3 HUMANE AND DIGNIFYING TREATMENT

ELC Suppliers must treat their employees¹ with respect and dignity. They must not engage in any kind of physical, verbal, psychological or sexual abuse, harassment or any other forms of intimidation or misconduct.

2.4 WORKING HOURS

ELC Suppliers must uphold the local legal or contractually agreed-upon limit on hours worked. Where no limit is imposed, they must not engage workers for more than 60 hours a week at most, outside of extraordinary circumstances. Workers must receive at least one day off in seven days, or the local legal standard (whichever is greater), receive any legally required daily rest periods, and must not be required to take work home.

2.5 WAGES BENEFITS AND TERMS OF EMPLOYMENT

ELC Suppliers must pay their employees any legally prescribed, contractually agreed-upon or applicable prevailing industry minimum wage (whichever is higher), as well as any legally prescribed benefits. Workers must not be subject to financial penalties as a disciplinary measure or for poor performance, or to illegal deductions for benefits payments.

2.6 EQUALITY, INCLUSION AND DIVERSITY

ELC Suppliers must strive to promote an environment that is free from discrimination and inclusive of all people and their unique abilities, strengths and differences. ELC Suppliers must provide equal opportunities, in all aspects of employment and must not subject their workers to any illegal discrimination with regard to recruitment, hiring, remuneration, promotion, access to training, professional development, retirement or termination. Any employment decisions must be based on worker's ability and not on personal characteristics such as race, creed, colour, religion, gender, sex, age, national origin, alienage or citizenship status, sexual orientation, gender identity

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Revised on April 2020

This version supersedes any previous version of ELC's Supplier Code of Conduct

¹As used in this Supplier Code, 'workers' or 'employees' of ELC Suppliers shall mean all workforce of such ELC Suppliers, including full-time or part-time employees and outsourced, contracted or seasonal worker.

or expression, marital, partnership or familial status, disability, genetic information, veteran/military status, domestic violence victim status, social background, caste, health status, pregnancy, or any other characteristic protected by law. Workers with the same qualifications, skills, experience and performance should receive equal pay for equal work, as required by local law.

2.7 FREEDOM OF ASSOCIATION

ELC Suppliers must recognise the right of employees to associate freely and must comply with all local laws governing the right of employees to select or not to select workplace representatives.

PROVIDE A SAFE, HEALTHY WORKPLACE AND PROTECT THE ENVIRONMENT AND COMMUNITY

3.1 HEALTH AND SAFETY

ELC Suppliers must meet and strive to exceed requirements of applicable health and safety laws and regulations. ELC Suppliers must maintain a clean, healthy and safe workplace. Any residential facilities must be similarly maintained. Work areas must be of a standard to prevent accidents, injuries and illnesses, and to ensure an adequate level of sanitation. ELC Suppliers must reduce the potential for injuries and illnesses in the workplace by eliminating or minimising workplace hazards and providing health and safety training to workers.

3.2 ENVIRONMENT

ELC Suppliers must meet all requirements of applicable environmental laws and regulations related to their products' development, manufacturing, and distribution. ELC Suppliers must strive to continually improve their environmental footprint including the promotion of sustainability initiatives such as energy and water conservation, pollution prevention, waste minimisation, reuse and recycling practices.

IMPLEMENTATION

ELC will work with ELC Suppliers, as appropriate, to ensure they fully understand the intent and requirements of the Supplier Code.

ELC Suppliers are expected to make all reasonable efforts to communicate the Supplier Code, to their workers, as appropriate, and provide workers with the opportunity to ask questions and raise concerns.

ELC approves new suppliers or new manufacturing plants after suppliers meet the requirements set forth in the Supplier Code evaluation process, which requires all ELC Suppliers to sign the Supplier Code and applicable ELC Suppliers to complete an assessment or on-site audit.

ELC contracts with third parties to conduct on-site audits for ELC Suppliers that are selected based on criteria such as geography, type of material and impact to the business. ELC also assesses certain ELC Suppliers against environmental and social criteria using a third-party sustainability ratings platform.

If an ELC Supplier appears to be in non-compliance with the Supplier Code, we expect the ELC Supplier to cooperate and provide additional information, for us to decide whether such ELC Supplier is compliant.

If we determine the ELC Supplier is not compliant, then the remedies may include, among other things, termination of business with ELC or the development and implementation of a corrective action plan that would need to be implemented within a certain fixed period of time. ELC may follow such implementation by a follow up audit, as it deems appropriate.

To learn more about ELC's commitment to sustainability please visit the [Sustainability section of our Corporate Website](#). For additional guidance, also review ELC's Supplier Sustainability Guidelines. The Supplier Sustainability Guidelines provide ELC Suppliers with actions ELC Suppliers can take, building on the foundation of the Supplier Code standards, to move towards best practice and continuous improvement.

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Acknowledgement

I hereby acknowledge, on behalf of the Supplier, that I have received, read and understand the requirements set forth in The Estée Lauder Companies' Supplier Code of Conduct. I confirm, on behalf of the Supplier, that I am an authorised signatory of the Supplier and the Supplier will comply with the Supplier Code and the laws referred to in the Supplier Code.

SUPPLIER NAME _____

SIGNATURE _____

NAME _____

TITLE _____

DATE _____