

## The Estée Lauder Companies Inc. Human Rights Policy

### OUR COMMITMENT

Every day at The Estée Lauder Companies Inc. (we, us, our or ELC)\*, we make choices that we know will have impact far beyond our business, and that is a responsibility we take very seriously. As we approach human rights in our operations and across our value chain, we aspire to foster respect for people and the environment and to be a positive influence in every community in which we operate and from which we source.

As a global company, we comply with laws and regulations around the world where we conduct business. We also look to those who provide us with services or goods (collectively “suppliers”) to operate in compliance with all applicable laws, including, but not limited to, employment laws pertaining to child labor, minimum wages, overtime compensation, hiring, and occupational safety.

This human rights policy outlines our approach to respect human rights across our global operations and supply chain and recognizes these international protocols:

- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights

### OUR APPROACH

This policy applies to all ELC employees, locations, operating companies and employees of subsidiaries and joint ventures in which we hold a majority interest. We also expect our suppliers to respect human rights in their own operations and supply chains. We promote a culture of uncompromising ethics and integrity and put forth standards to uphold the principles and ideals that make us a global leader in prestige beauty. We have tailored approaches for various stakeholder groups that focus on key risks and opportunities.

As of the date of this policy, we have policies, processes, training and systems in place to identify, assess, monitor and mitigate or eliminate actual or potential human rights impacts, several of which are referenced below.

We have conducted a corporate-level Human Rights Assessment (HRA) based on the methodology outlined by the UN Guiding Principles on Business & Human Rights, the global standard for HRAs. Through the HRA process, we assessed human rights risks and impacts across our operations, including our corporate policies and procedures, as well as our supply chain, manufacturing, and retail operations. The HRA has provided us with a framework to help identify

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\* ELC, we, us and our refer to The Estée Lauder Companies Inc. and its subsidiaries. In the case of recently acquired subsidiaries or businesses, application of this policy will be subject to a transition period, the length of which will depend on the status and capabilities of the acquired businesses and/or entities.

and prioritize our salient human rights risks and impacts, and to identify key actions for improvement.

We intend to continue to enhance these processes and policies and engage with our internal and external stakeholders in implementing this policy.

### *OUR OPERATIONS*

We strive to promote a safe, inclusive, and diverse work environment where all employees feel welcome and valued. We strictly prohibit discrimination based on race, creed, color, religion, sex, gender, age, national origin, alienage or citizenship status, sexual orientation, gender identity or expression, marital, partnership or familial status, disability, genetic information, veteran/military status, domestic violence victim status, or any other characteristic protected by law.

Our [Code of Conduct](#) (“Code”) sets forth basic guidelines that all employees are expected to follow. It also outlines our commitments to our employees, including:

- providing equal opportunities for employment;
- basing employment decisions on merit, considering qualifications and achievement; and
- having a zero-tolerance policy for harassment and strictly prohibiting conduct that constitutes, or that could lead or contribute to, harassment based on a protected class.

All ELC employees are expected to conduct themselves at all times within the letter and the spirit of the Code. All employees are required to sign off on the Code upon hire and certain employees receive annual Code refresher training. We conduct training for managers, supervisors and other appropriate employees on topics related to our Code, inclusive of unconscious bias and inclusion and diversity training. We report on our inclusion and diversity metrics in our [Social Impact & Sustainability reports](#).

We are committed to maintaining a safe and healthy workplace and have achieved a world class-level low total incident rate. We continuously assess our performance and set corporate-wide safety goals in support of our commitment to employee safety. We also provide health and wellness programs for our employees.

We have a longstanding commitment to inclusion and diversity and to empowering employees at all levels of the company. We are dedicated to fostering inclusive environments and initiatives for our workforce and consumers. We have taken several actions to toward this goal, including specific commitments and benchmarks against gender and racial equity and pay parity as an important step towards achieving full equity in all aspects of employment at The Estée Lauder Companies. [Read more](#) about these commitments.

### *OUR SUPPLIERS*

We recognize that our suppliers operate in diverse legal and cultural environments throughout the world. Our [Supplier Code of Conduct](#) (“Supplier Code”) sets forth the basic requirements we expect of suppliers, including vendors, service providers, independent contractors and consultants. The Supplier Code addresses our expectations for suppliers in addressing or dealing with human

rights matters, including: child labor, forced labor, discrimination, worker health and safety, environment, ethical practices, privacy and anticorruption. We look for ways to strengthen our Supplier Code controls and systems and revise and update it as needed.

We take a risk-based approach to supplier due diligence. We conduct due diligence as part of new supplier qualifications and assess risk of existing direct and indirect suppliers annually. We risk-rank direct and indirect suppliers globally based on pre-established criteria, such as location of operations, type of goods or services being sourced, and potential impact to our business. Based on the risk ranking of the supplier, we conduct additional due diligence using third-party on-site audits or assessments, as appropriate. This additional due diligence assesses suppliers on environmental impact, labor, human rights, and ethics.

In this regard, we provide guidance to suppliers, which can be found in the ELC [Supplier Sustainability Guidelines](#). This includes ways a supplier can build upon the foundation of the Supplier Code standards, to consider and apply to its business sustainability and human rights best practices and continuously improve.

We have collaborated with suppliers, industry groups, peers, local non-governmental organizations and communities to address certain pressing human rights challenges and advance our practices. We will continue to work collaboratively across our many stakeholders to address these complex challenges and matters as they arise.

#### *OUR CONSUMERS*

Consumers around the world trust our brands to deliver a High-Touch beauty experience that is safe, effective and socially and environmentally responsible. We greatly value the trust our consumers place in our extraordinary products for their efficacy and safety. Our [Ingredient and Product Testing and Safety](#) commitment outlines how we ensure that all our products are safe to use as intended.

We know that consumers trust us with their personal information, and we are committed to respecting their privacy and the security of their information.

#### *OUR COMMUNITIES*

As a global company with a portfolio of well-known brands, we have many opportunities for meaningful engagement in citizenship causes that matter to our employees, consumers, communities and suppliers. We develop and implement strategies to reduce operational impacts for our company-owned production, distribution and retail facilities. We have also set citizenship and sustainability goals in focus areas where we believe we have the opportunity to positively impact the environment and society. To read more about our commitment to citizenship and sustainability, please visit our [website](#).

#### **ACCESS TO GRIEVANCE AND REMEDY**

We have grievance mechanisms in place for employees and others affected by our operations to report any concerns or potential violations of this policy. Employees have several avenues to raise

questions or concerns about whether any behavior is consistent with the law, our Code of Conduct or Company policies, including our Human Rights Policy. If there are allegations of a violation, the matter will be reviewed, investigated and remediated as appropriate. Employees and non-employees can report concerns through our [Integrity Helpline](#) and other resources.

We will not tolerate retaliation against anyone who in good faith raises questions or concerns about a potential violation of the law, our Code, or Company policies, or who assists in an investigation of a reported violation. Retaliation in any form is itself a serious violation of our Code and is strictly prohibited. Acts of retaliation or potential retaliation should be reported immediately. Anyone found to have retaliated against an individual will be subject to disciplinary action, up to and including termination of employment.

### **GOVERNANCE AND OVERSIGHT**

At ELC, our human rights policy and progress is overseen by our Executive Vice President, Global Human Resources; Executive Vice President, Global Supply Chain; and Senior Vice President, Global Corporate Citizenship and Sustainability.

ELC intends to review and update this policy periodically to reflect changes in processes and procedures.

This policy has been reviewed by and approved by our Chief Executive Officer and Executive Chairman.