



## **AVON PRODUCTS, INC.**

### **AVON SUPPLIER GLOBAL CODE OF CONDUCT**

At Avon, we believe in five core values: Trust, Respect, Belief, Humility and Integrity. While each plays an integral role in our global business operations, the value of Integrity holds a special place in Avon's culture and serves to anchor our company in an increasingly complex and demanding world. Avon defines Integrity as setting and observing the highest ethical standards and always doing the right thing. In remaining true to this value, we fulfill a duty of care, not only to our Independent Representatives and customers in the communities we serve, but to our colleagues and ourselves.

Avon upholds these values in its own operations and is committed to working with reputable business partners who demonstrate the same dedication to ethical business standards and practices as Avon does.

To help fulfill this commitment, the Avon Supplier Global Code of Conduct (hereby referred to as the "Code of Conduct") was created and applies to any company, its factories, manufacturers, vendors or agents (hereby referred to as "Suppliers") that produce goods and/or provide services for Avon Products, Inc. or any local affiliate thereof. This Code of Conduct, issued on October 13 of 2015 supersedes all previous Supplier Global Codes of Conduct.

While Avon recognizes that there are different legal and cultural environments in which Suppliers operate throughout the world, this Code of Conduct sets forth the minimum expectations under which Avon and our worldwide Suppliers are required to operate.

Further, Avon strongly encourages Suppliers to exceed the requirements set forth in this Code of Conduct and to promote best practices and continuous improvement.

- 1. Laws and Regulations:** Notwithstanding anything herein and to the contrary, Suppliers must operate in full compliance with all compulsory laws and regulations of the countries in which they operate.
- 2. Child Labor:** Suppliers must not employ workers younger than the greater of (i) 15 years of age, or 14 where the local law allows such exception consistent with International Labor Organization guidelines, or (ii) the age for completing compulsory education, or (iii) the minimum age established by law in the country of manufacture.

In addition, Suppliers must comply with all legal requirements for authorized young workers, particularly those pertaining to hours of work, wages, and working conditions.

**3. Forced Labor:** Suppliers will not use forced labor, whether prison, bonded, indentured or otherwise and will not engage in or support trafficking in human beings. Forced overtime is also prohibited.

**4. Discipline:** All workers must be treated with respect and dignity. No worker shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse as defined by applicable law. In addition, Suppliers will not use monetary fines as a disciplinary practice.

**5. Hours:** Suppliers will not require workers to work in excess of the lesser of (i) the limits on regular and overtime hours allowed by the law of the country where the worker is located, or (ii) 60 hours a week on a regularly scheduled basis, including overtime, and, except under extraordinary business circumstances, 72 hours a week as an absolute maximum. In addition, Suppliers will ensure all workers are entitled to at least 1 day off every consecutive seven-day period.

**6. Wages/Benefits:** Suppliers must ensure that they pay workers at least the legal minimum wage, as well as the legally mandated overtime premium, for all hours worked and that there will be no monetary fines for poor performance. Suppliers must also ensure that all legally mandated benefits are being provided and that there will be no illegal deductions for benefits.

**7. Discrimination:** While Avon recognizes and respects cultural differences, Suppliers must ensure employment (including hiring, remuneration, benefits, advancement, termination and retirement) is based on ability and not on race, color, religion, sex, age, national origin, disability, pregnancy, marital or partnership status, sexual orientation, gender identity, veteran's status, or any other personal characteristics protected by law in each locality. Suppliers must comply with all applicable country and local laws governing non-discrimination in employment.

**8. Freedom of Association/Collective Bargaining:** Workers should be free to join organizations, such as trade unions, of their own choosing, and to refrain from joining such organizations if that is their wish. Suppliers must not threaten or penalize workers for their efforts to organize or bargain collectively where permitted by the laws of the country where the worker is located, nor may they discriminate against workers as a result of any such organization affiliation.

**9. Health and Safety:** Suppliers must provide their workers with a clean, safe and healthy work environment in compliance with all applicable, legally mandated standards for workplace

health and safety in the countries in which they operate. This includes residential facilities, if applicable. In addition, Avon encourages Suppliers to strive to implement industry best practices, where applicable.

**10. Environmental Management:** Suppliers must comply with all local environmental laws applicable to their operations. In addition, Avon encourages Suppliers to have environmental policies and environmental management systems containing goals with targets that are focused on the continuous improvement of overall environmental performance.

**11. Subcontractors:** Suppliers must not use subcontractors in the production of Avon products or product components without Avon's prior written approval, and only after the subcontractor has agreed in writing to comply with this Code of Conduct, as well as any other terms that Avon may require.

**12. Communication:** Suppliers must communicate the provisions of this Code of Conduct to their workers and supervisors. Avon will periodically conduct supplier seminars on how to implement and uphold its Code of Conduct.

**13. Monitoring and Compliance:** Avon will undertake affirmative measures such as announced and unannounced on-site inspections of Supplier premises and production facilities, to monitor compliance with this Code of Conduct. Suppliers must maintain on site all documentation necessary to demonstrate compliance with this Code of Conduct. Suppliers must allow Avon's associates and/or its third party monitoring firms full access to premises and production facilities, worker records and workers for confidential interviews in connection with monitoring visits.

**14. Integrity and Anti-Corruption:** Suppliers must conduct business with honesty and integrity and demonstrate the highest standards of business ethics. Suppliers must not engage in bribery, corruption, or other unethical or illegal practices whether in dealings with government officials (which includes government employees or officers at any level, employees or officers at government-controlled or owned entities, employees or officers of public international organizations, and political officials or candidates or anyone acting on such a person's behalf), political parties or others, including individuals in the private sector. This includes, directly or indirectly, paying, giving, offering, promising, or authorizing money or anything of value to anyone to seek to obtain an undue or improper advantage. This also includes any unethical business activities or arrangements between Supplier and any Avon Associate or any other company or individual.

**15. Accuracy of Business Records:** Suppliers will record and report information accurately and honestly and will not hide, fail to record, or make false entries. All books, records and accounts must accurately reflect transactions, payments and events, and conform to generally accepted accounting principles, good internal controls and all applicable laws and regulations.

**16. Responsible Sourcing:** Suppliers will be committed to the sourcing of raw materials, goods and services with the same fundamental support of human rights, labor, health and safety, environment, and ethics -- unbounded by specific materials or locations, and develop and/or maintain the capability to identify all materials contained in its products for Avon.

- Where applicable, we expect our suppliers to take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.
- Avon is committed to helping end deforestation through the Avon Palm Oil Promise and the Avon Paper Promise. To that end and where applicable, Suppliers shall work in collaboration with Avon to help ensure: (i) palm oil, palm kernel oil (PKO), and palm/PKO derivatives used in Avon products globally meet the guidelines outlined in the Avon Palm Oil Promise; and (ii) paper and wood fiber products used in Avon's brochures, literature and products meet the guidelines outlined in the Avon Paper Promise.

The signatory of the Acknowledgment of The Supplier Code of Conduct, on behalf of the Supplier, acknowledges their understanding of, and their compliance with, all applicable laws and this Code of Conduct. Suppliers are expected to take necessary corrective actions to remediate promptly any noncompliance. Avon reserves the right to terminate its business relationship with any Supplier who is unwilling to comply with this Code of Conduct.