

## Particulars

### About Your Organisation

#### 1.1 Member Name

The Estee Lauder Companies Inc.

#### 1.2 Membership number

4-0596-15-000-00

#### 1.3 Membership sector

Consumer Goods Manufacturers

#### 1.4 Membership category

Ordinary

#### 1.5 Country

United States

### 2.0 Does your company or organisation produce, process, consume or sell any palm oil or any products containing derivatives of palm oil?

Yes

### 2.1 Please select all description(s) that describe the palm oil-related activities of your company or organisation. Multiple selections are allowed, and not limited to the primary sector of the member's RSPO membership. You will be required to complete the relevant ACOP section based on your selection(s).

- I own and operate oil palm estate(s) and/or palm oil mill(s)
- I represent a palm oil Independent Smallholder farmer Group
- I own and operate independent palm oil mills
- I own and operate independent palm kernel crushing plants
- I trade or broker palm oil, palm kernel oil or related products
- I am a refiner of palm oil or palm kernel oil
- I am a processor of intermediate (B2B) palm oil, palm kernel oil or related ingredients
- I am a B2B distributor or wholesaler of palm oil, palm kernel oil or related products
- I manufacture consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by 3rd party contractors.
- I retail consumer (B2C) products containing palm oil, palm kernel oil or related products
- I operate food retail outlets that use palm oil, palm kernel oil or related products
- I support the sustainable development of the palm oil industry as a conservation and environmental NGO
- I support the sustainable development of the palm oil industry as a social and human development NGO

## Consumer Goods Manufacturers

### 1. Operational Profile

#### 1.1 Please state your company's main activity within the palm oil supply chain.

- Food Good Manufacturer - own brand
- Food Good Manufacturer - third-party brand
- Home & Personal Care Good Manufacturer - own brand
- Home & Personal Care Good Manufacturer - third-party brand
- Ingredient Manufacturers
- Biofuels
- Other

Other

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## 2. Palm Oil and Certified Sustainable Palm Oil Consumption

*Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the RSPO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports without reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports may lead to suspension or termination of RSPO membership.*

**2.1 Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are owned and/or managed by the member, including those under Group Membership**

Fully-owned

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**2.1.1 In which markets does your company sell goods with palm oil and oil palm products?**

Europe, North America, China, India, Malaysia, Indonesia, Africa, Latin America, Rest of the World

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**DL.2.0 In order to facilitate ease of reporting and transparency, RSPO members operating within the palm oil demand supply chain can now choose to report palm oil and palm oil product volumes on:**

an aggregate level (as in previous ACOP reporting cycles)

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**2.2 Total volume of uncertified and certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand and third-party brand products**

Description	Tonnes
Total volume of crude palm oil (tonnes)	0.0
Total volume of crude palm kernel oil (tonnes)	0.0
Total volume of palm kernel expeller (tonnes)	0.0
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	3614.0
Total	3614.0

**2.2.1 Please estimate the percentage of derivatives and fractions (reported in Question CG.2.2) derived from palm oil or from palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based derivatives.**

Description	Percentage
Palm oil-based derivatives and fractions	29.0
Palm kernel oil-based derivatives and fractions	71.0

**2.3 Please estimate the regional distribution of your company's uncertified and certified palm oil, palm kernel oil and related products sales (as declared in Question 2.2) in the following countries/regions. In cases where sales distribution data is not available, members may use manufacturing regions as a proxy for regional usage of certified volumes.**

Countries/Regions	Percentage
Europe	18.0
North America	35.0
Malaysia	0.0
Indonesia	0.0
China	13.0
India	1.0
Latin America	2.0
Africa	1.0
Rest of World	30.0

**2.4 Volume of RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand and third-party brand products in the year:**

<b>Description</b>	<b>Crude/Refined Palm Oil (CSPO)</b>	<b>Crude/Refined Palm Kernel Oil (CSPKO)</b>	<b>Palm Kernel Expeller (CSPKE)</b>	<b>Certified Derivatives and Fractions</b>
RSPO Credits from Mill / Crusher	0.0	0.0	0.0	0.0
RSPO Credits from Independent Smallholder	0.0	0.0	0.0	1066.0
Mass Balance (MB)	0.0	0.0	0.0	2545.98
Segregated (SG)	0.0	0.0	0.0	0.0
Identity Preserved (IP)	0.0	0.0	0.0	2.72
Total	0.0	0.0	0.0	3614.7

**2.4.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question CG.2.4) derived from RSPO-certified palm oil or from RSPO-certified palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based**

<b>Description</b>	<b>Percentage</b>
Certified Palm oil-based derivatives and fractions	29.0
Certified Palm kernel oil-based derivatives and fractions	71.0

**2.5 According to the volume information you have provided in Question 2.2 and Question 2.4, your company's certified palm oil and palm oil products uptake is:**

100.02%

**2.5.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake. This may include your usage of RSPO Credits to cover gaps in certified uptake, changes due to business environment, variations due to stock positions or efforts to support independent smallholders beyond volume commitments.**

ELC endeavors to source our palm-based ingredients responsibly and sustainably with respect for local communities and the environment by procuring ingredients from suppliers that can demonstrate adherence to the principles outlined in our Supplier Code of Conduct and NDPE policy. We assess compliance with these responsible sourcing policies through supplier performance, increased traceability and third-party certification to RSPO's Principles and Criteria.

Since 2015, 100% of the palm-based ingredients (palm oil and its derivatives)\* ELC sources for its products are RSPO certified through a combination of RSPO certified physical supply chains and RSPO Book & Claim palm oil credits. In 2019, ELC committed that at least 90% of our palm-based ingredients\* will be certified sustainable from RSPO physical supply chains by 2025.

ELC is committed to supporting smallholder farmers by helping to build their capacity and improve their livelihoods with the goal of increasing their participation in the palm oil supply chain. We support smallholders in several ways:

**Project Lampung:** In 2019, the company launched Project Lampung in partnership with global NGO Solidaridad, BASF (a long-term supplier of ELC), the Roundtable of Sustainable Palm, Business Watch Indonesia (BWI), and the Indonesian Agency for Agricultural Extension (KTNA), a local farmers association, to build the capacity of 1,000 smallholder farmers in the Lampung Province of Indonesia to produce sustainable palm oil and improve incomes and livelihoods. [Read more here.](#)

**Mosaik Initiative:** In 2020, the ELC Charitable Foundation approved a grant to Action for Sustainable Derivatives to kickstart an innovative pooled-funding model to generate large-scale positive impact on the ground in priority production landscapes. The grant is to be used to expand the Mosaik Initiative, a proven jurisdictional certification approach to sustainable palm production and landscape management and restoration in Central Kalimantan led by NGO partner Institut Penelitian Inovasi Bumi (Inobu).

**Purchasing Independent Smallholder RSPO Credits:** In addition to our expanded portfolio of palm related positive impact projects, we procure Independent Smallholder RSPO credits to support direct market access for certified smallholders.

ELC remains committed to identifying opportunities to extend and scale our impact to create an inclusive and sustainable palm supply chain by continuing to invest in relevant partnerships and projects (including purchases of smallholder credits ) that improve smallholder livelihoods and protect and restore the environment at a scale equal or greater to our palm sourcing impact.\*\*

\*Excludes palm-based ingredients not directly procured by The Estée Lauder Companies, such as those procured by Third-Party Manufacturers.

\*\* Palm sourcing footprint is calculated based on 2019 volume of palm and palm kernel oil based derivatives purchased directly by ELC. Yield per hectare baseline estimate was calculated based on 2019 data from the USDA 2019 GAIN Report for "Indonesia Oilseeds and Products Annual 2019".

2.6 Please estimate the regional distribution of your company's RSPO certified palm oil and palm oil-products usage (as declared in Question CG.2.3) in the following countries/regions:

<b>Countries/Regions</b>	<b>Percentage</b>
Europe	18.0
North America	35.0
Malaysia	0.0
Indonesia	0.0
China	13.0
India	1.0
Latin America	2.0
Africa	1.0
Rest of World	30.0

### 3. TimeBound Plan

**3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification?**

2021

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**3.2 Which year did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and palm oil products in own-brand products**

2015

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**3.2.1 If the previous target year has not been met, please explain why.**

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**3.3 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from any supply chain option in own-brand products.**

2015

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**3.3.1 If the previous target year has not been met, please explain why.**

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**3.4 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in own-brand products.**

2030

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**3.4.1 If the previous target year has not been met, please explain why.**

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**3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why**

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#### 4. Trademark Use

##### 4.1 Does your company use or plan to use the RSPO Trademark in own-brand products?

No

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##### 4.3 Please explain why your company does not plan to use the RSPO Trademark in own-brand products

- Challenging reputation of palm oil
- Confusion among end-consumers
- Costs of changing labels
- Difficulty of applying for RSPO Trademark
- Lack of customer demand
- Limited label space
- Low consumer awareness
- Low usage of palm oil
- Risk of supply disruption
- Others

Others

Trademark usage on our products is calculated on a case by case basis. At this time, we do not have plans to use the RSPO trademark on our product packaging.

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## 5. Actions for Next Reporting Period

### 5.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

The Estée Lauder Companies has committed that by 2025, at least 90% of our palm-based ingredients (palm oil and its derivatives) will be certified from RSPO physical supply chains.\* To meet this commitment, we will continue to substitute existing palm-based ingredients with RSPO-certified Mass Balance alternatives by partnering with strategic suppliers on our palm oil sourcing policy. We conduct due diligence of our palm oil sourcing to ensure compliance with our NDPE policy and have developed a palm oil action plan. We will report on this process annually as appropriate.

ELC plans to accelerate our sustainable palm procurement by:

- Continuing to build supplier capacity to make progress against our goal that at least 90% of our palm-based ingredients\* will be certified sustainable from RSPO physical\* supply chains by 2025.
- Offering training on our NDPE policy and palm action plan to our key direct palm-based ingredient suppliers and relevant Third-Party Manufacturers.
- Leveraging an industry aligned supplier sustainable palm sourcing assessment methodology with key palm suppliers in 2021 to inform supplier prioritization and drive continuous improvement.

In addition, ELC is continuing to monitor our sustainable palm procurement by building transparency and confidence in our supply chain among partners and suppliers through industry collective action.

The Estée Lauder Companies is a founding member of Action for Sustainable Derivatives (ASD), a collaboration of brands and suppliers aimed at addressing responsible sourcing in complex derivative supply chains by collaborating to harmonize approaches on transparency, risk monitoring and evaluation. Through our membership in ASD, ELC is committed to establishing traceability to the point in the supply chain where suppliers can demonstrate that the palm ingredients meet our sourcing principles, and collectively monitor and address grievances.

In 2020, ELC gained traceability to the mill for over 70% of our palm volume purchased\* in 2019. Additionally, through our ASD membership, ELC leverages dynamic monitoring of our traced supply chain through a shared grievance dashboard. If evidence of a grievance is found, the grievance reports will be reviewed, investigated, and addressed through industry collaboration or ELC's individual action.

We will continue our monitoring and transparency efforts by:

- tracing our palm supply chain to achieve increased traceability to the mill and beyond;
- driving industry alignment through our partnership with ASD; and
- contributing to shared monitoring of risk, grievances, and continuous improvement plans, as needed.

The Estée Lauder Companies recognizes this commitment is a journey and we expect to continue to evolve and establish best practices with our partners and other stakeholders. We plan to share and update our progress on priority areas, including RSPO physically certified sustainable palm volumes, traceability and community impact projects on an annual basis.

\*Excludes palm-based ingredients not directly procured by The Estée Lauder Companies, such as those procured by Third-Party Manufacturers.

## Shared Responsibility

*The Board of Governors of the Roundtable on Sustainable Palm Oil approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility indicators will be done through several channels, including ACOP. As the implementation of Shared Responsibility reporting is still on-going and in development, the Shared Responsibility section in ACOP is not yet final and may change in future ACOP cycles. For more information on Shared Responsibility, please go to <https://rspo.org/news-and-events/news/what-are-the-new-shared-responsibility-rules> or email the ACOP team at [acop@rspo.org](mailto:acop@rspo.org)*

### Labour & Labour Rights

**1.1 Does your company have a publicly-available policy covering Labour & Labour Rights?**

Yes

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**1.1.1 Does the policy cover:**

- No discrimination
- Wage and working conditions
- Freedom of association
- No child labour
- No harassment
- No forced or trafficked labour

### Ethical Conduct & Human Rights

**1.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?**

Yes

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**1.2.1 Does the policy cover:**

- Recruitment
- Contractors
- Sub-Contractors & Third-Party Contractors

### Land Use

**1.3 Does your company have a publicly-available Policy covering Land Use?**

Yes

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**1.3.1 Does the policy cover:**

- Free Prior and Informed Consent (FPIC)
- Compensation

### Occupational Health & Safety

**1.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?**

Yes

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### Climate Change & Greenhouse Gas (GHG)

**1.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?**

Yes

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**1.5.1 Does the policy cover:**

- Identification and assessment of GHG
- Monitored implementation plan to reduce or minimise GHG emissions

### Complaints & Grievances

**1.6 Does your company have a Complaints & Grievances Mechanism?**

Yes

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**1.6.1 Is your Complaints & Grievance mechanism in line with the principles of the RSPO's grievance mechanism, which are the elements of fairness, transparency, and impartiality?**

Yes

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### Smallholders

**1.7 Does your company support oil palm independent smallholder groups?**

Yes

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**1.7.1 Does this support cover:**

- Fair and transparent dealings with Smallholders
- Improved Smallholder livelihoods

### 1.7.2 How is your company supporting them?

ELC is committed to supporting smallholder farmers by helping to build their capacity and improve their livelihoods with the goal of increasing their participation in the palm oil supply chain. Initiatives include:

#### Project Lampung:

In 2019, ELC launched Project Lampung in partnership with global NGO Solidaridad, BASF (a long-term supplier of ELC), the Roundtable of Sustainable Palm, Business Watch Indonesia (BWI), and the Indonesian Agency for Agricultural Extension (KTNA), a local farmers association, to build the capacity of 1,000 smallholder farmers in the Lampung Province of Indonesia to produce sustainable palm oil and improve incomes and livelihoods.

#### Mosaik Initiative:

In 2020, the ELC Charitable Foundation approved a grant to Action for Sustainable Derivatives to kickstart an innovative pooled-funding model to generate large-scale positive impact on the ground in priority production landscapes. The grant is to be used to expand the Mosaik Initiative, a proven jurisdictional certification approach to sustainable palm production and landscape management and restoration in Central Kalimantan led by NGO partner Institut Penelitian Inovasi Bumi (Inobu).

#### Purchasing Independent Smallholder RSPO Credits:

In addition to our expanded portfolio of palm related positive impact projects, in 2021, we procured Independent Smallholder RSPO credits equivalent to 29.5% of our 2020 palm ingredient volume supporting direct market access for certified smallholders.

ELC remains committed to identifying opportunities to extend and scale our impact to create an inclusive and sustainable palm supply chain by continuing to invest in relevant partnerships and projects (including purchases of smallholder credits) that improve smallholder livelihoods and protect and restore the environment at a scale equal or greater to our palm sourcing impact.\*

\*Palm sourcing footprint is calculated based on 2019 volume of palm and palm kernel oil based derivatives purchased directly by ELC. Yield per hectare baseline estimate was calculated based on 2019 data from the USDA 2019 GAIN Report for "Indonesia Oilseeds and Products Annual 2019".

**Sustainable Palm Oil Policy**

**1.8 Does your company have a publicly-available Policy covering the implementation of RSPO Shared Responsibility principles?**

Yes \_\_\_\_\_

**Waste Management**

**1.9 Does your company have a waste management plan?**

Yes \_\_\_\_\_

**Water Management**

**1.10 Does your company have a water management plan?**

Yes \_\_\_\_\_

**Energy Use**

**1.11 Does your company have an energy use plan covering fossil fuels and renewable energy?**

Yes \_\_\_\_\_

**RSPO Services and Support**

**1.12 Does your company provide services and support to the RSPO, eg. participation in RSPO Working Groups and Task Forces**

Yes \_\_\_\_\_

**Shared Responsibility Resourcing**

**1.13 Does your company have a plan to commit resources to ensure effective implementation of RSPO Shared Responsibility principles?**

Yes \_\_\_\_\_

## Challenges and Support

### 1.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?

- Awareness of RSPO in the market
- Difficulties in the certification process
- Certification of smallholders
- Competition with non-RSPO members
- High costs in achieving or adhering to certification
- Human rights issues
- Insufficient demand for RSPO-certified palm oil
- Low usage of palm oil
- Reputation of palm oil in the market
- Reputation of RSPO in the market
- Supply issues
- Traceability issues
- No challenges faced
- Others

#### Others

The Estée Lauder Companies predominantly sources PKO-derived materials, similar to most other personal care products companies. The complexity of the PKO derivative ingredient supply chain continues to pose significant challenges to establishing source traceability, as well as to our tier 1 direct suppliers. In addition, the lack of upstream certified palm derivatives poses a challenge for our suppliers.

Additionally, we are working to increase procurement of certified sustainable palm derived ingredients through physical supply chains in a market environment that offers limited availability of RSPO-certified PKO and PKO-derived ingredients.

**Resolution/Mitigation Efforts:** The Estée Lauder Companies is collaborating with stakeholder groups and other companies to identify mechanisms to improve traceability in the PKO and PKO derivatives supply chain with a goal to increase our procurement of CSPKO ingredients and collectively engage key actors along the supply chain. Through our membership in the Action for Sustainable Derivatives (ASD) collaborative initiative, we are working to establish traceability to the point in the supply chain where suppliers can demonstrate that the palm ingredients meet our sourcing principles. In 2020, ELC gained traceability to the mill for over 70% of our palm volume purchased\* in 2019. We will further our commitment to monitoring and transparency by continuing to invest in tracing our palm supply chain to achieve increased traceability to the mill and beyond and continuing to drive industry alignment through our partnership with ASD by contributing to shared monitoring of risk, grievances, and continuous improvement plans, as needed.

Additionally, through our ASD membership, ELC leverages dynamic monitoring of our traced supply chain through a shared grievance dashboard. If evidence of a grievance is found, the grievance reports will be reviewed, investigated, and addressed through industry collaboration or ELC's individual action.

We are also members of the North American Sustainable Palm Oil Network (NASPON) to support the goal of reaching 100% CSPO in the market. The Estée Lauder Companies is also continuing to search for greater volumes of Mass Balance products as the oleo-chemical industry evolves to meet growing demand for CSPO/PKO materials. We are continuing to develop a responsible sourcing framework that will help ensure the sustainable use of materials from biodiversity. This effort is planned to further strengthen our corporate commitment to sustainable sourcing practices.

\*Excludes palm-based ingredients not directly procured by The Estée Lauder Companies, such as those procured by Third-Party Manufacturers.

## 1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?

- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
- Promotion of physical CSPO
- Providing funding or support for CSPO development efforts
- Research & Development support
- Stakeholder engagement
- No actions taken
- Others

### Others

The Estee Lauder Companies is one of the founding members of the Action for Sustainable Derivatives (ASD), a collaborative initiative co-managed and co-facilitated by BSR and Transitions, to promote responsible sourcing and collective action to increase sustainable production of palm oil and palm oil derivatives. ASD participants aim to scale up efforts towards compliance with No Deforestation, No Peat, No Exploitation (NDPE) principles and to positively transform the palm oil industry. By harmonizing requirements, standardizing tools and methodologies, and mutualizing efforts, ASD intends to increase the transparency of the global derivatives supply chain, collectively monitor risks and activities along the supply chain, and implement collective action projects to address social and environmental issues on the ground. We hosted a supplier webinar on the ASD initiative and to kick off the palm traceability exercise, where we informed our suppliers of our RSPO goals.

Additionally, The Estee Lauder Companies is a member of the RSPO's North American Sustainable Palm Oil Network (NASPON) whose aim is to educate, build momentum, and accelerate collaboration within the North American market for the uptake of Certified Sustainable Palm Oil. ELC has been an active member of the derivatives working group to collaboratively address common challenges in the palm derivatives supply chain.

While we have direct control over our own purchase of palm-based ingredients, we are also able to influence our larger network of suppliers and partners through continued communication and by outlining our expectations. Products manufactured by Third-Party Manufacturers (TPMs) that contain palm-based ingredients not directly procured by The Estée Lauder Companies are currently excluded from our palm oil goal. In fiscal 2020, we communicated to our TPMs our expectation that they use palm-based ingredients that are from an RSPO physically certified sustainable source (Mass Balanced, Segregated or Identity Preserved) to further advance our commitment to ensuring sustainable palm oil supply chains. We will be working with our TPMs to support the increase of RSPO-certified palm-based ingredients in products made on our behalf.

We also promote CSPO through the smallholder farmer projects we support. For example, Project Lampung's goal is to have a minimum of one-third of the supported smallholder farmers certified according to the Smallholder Standard of RSPO by the end of fiscal 2022.



**1.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here**

The Estée Lauder Companies (ELC) Palm Oil Action Plan: <https://www.elcompanies.com/en/our-commitments/viewpoints#palm-oil>

ELC FY19 Corporate Responsibility Report: <https://media.elcompanies.com/files/e/estee-lauder-companies/universal/our-commitments/2020-cs-report/elc-fy20-citizenship-sustainability-report.pdf>

NDPE policy: <https://www.elcompanies.com/en/our-commitments/viewpoints/ndpe>

Ethical Conduct & Human Rights Policies: ELC has two policies that address ethical conduct and human rights -- the ELC Code of Conduct (COC) and the ELC Supplier Code of Conduct (SCOC). The Estée Lauder Companies' processes are aligned with RSPO's grievance mechanism in that our process (i) provide employees with several avenues to raise questions or concerns about whether any behavior is consistent with the law, our Code of Conduct, or Company policies, (ii) ensure that reports about inconsistent conduct are reviewed, investigated, and remediated, (iii) protect our Company's commitment to conducting business with uncompromising ethics and integrity, (iv) protect reporters who in good faith raise questions or concerns about potential violations or who assist in an investigation of a reported violation from retaliation or discrimination, (v) allow non-employees to report concerns through our Company's Compliance Helpline. Our processes differ from the RSPO's grievance mechanism in that our processes ensure that questions and concerns are treated confidentially to the greatest extent possible and reporters are allowed to raise questions and concerns on an anonymous basis where permitted by law.

ELC Supplier Code of Conduct and Supplier Sustainability Guidelines:

<https://www.elcompanies.com/en/our-commitments/working-with-our-suppliers/supplier-code-of-conduct>

ELC Code of Conduct (including grievance mechanism): <https://media.elcompanies.com/files/e/estee-lauder-companies/universal/investors/corporate-governance/governance-principles/elc-code-of-conduct.pdf>

GHG Policy: <https://elcompanies.sharepoint.com/:b:/s/EICGCCS/EUtbYmdqMr1FoUV8cLUnBUcB-V5CGyrbXcTuSsFUQyN1og?e=KaLE0X>

ELC 2019 CDP Climate Disclosure: <https://media.elcompanies.com/files/e/estee-lauder-companies/universal/our-commitments/2020-cs-report/elc-cdp-climate-change-questionnaire-2020.pdf>

Although we do not have a public policy covering climate change and GHG, we continue to work to address the challenges and opportunities associated with climate change. This is a critical decade for climate action and, as a signatory of the Paris Agreement, The Estée Lauder Companies (ELC) is part of the global business community committed to taking bold action to address climate change. In 2020, ELC achieved Net Zero emissions and sourced 100% renewable electricity globally for its direct operations, reaching the target it set on joining RE100 in 2017. ELC also met its goal to set science-based emissions reduction targets (SBTs) for its direct operations and value chain, positioning the company to take even more decisive action against climate change in the coming decade. The targets address Scopes 1, 2, and 3 emissions and are independently validated and approved by the Science Based Target initiative (SBTi). To achieve its Net Zero emissions and RE100 goals by 2020, ELC focused first and foremost on reducing its operational carbon footprint by deploying high-quality solutions and investing in projects bringing additional renewable energy to the grid. The portfolio approach includes signing a Virtual Power Purchase Agreement (VPPA) for 22 megawatts (MW) of wind power from the Ponderosa wind farm in Oklahoma, sealing the company's largest renewable energy agreement to-date. The Ponderosa wind farm alone will cover more than half of the company's electricity footprint with renewable energy technologies. ELC further added to its global renewable energy portfolio by installing ground-mount and rooftop on-site solar arrays at its facilities around the world, bringing the company's global total to more than 5 MW of solar capacity.

Occupational Health & Safety: FY20 C&S Report, pgs 80-83

<https://media.elcompanies.com/files/e/estee-lauder-companies/universal/our-commitments/2020-cs-report/elc-fy20-citizenship-sustainability-report.pdf>