

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 - Processors and/or Traders
- I trade or broker palm oil, palm kernel oil or related products - Processors and/or Traders
- I am a refiner of palm oil or palm kernel oil - Processors and/or Traders
- I am a processor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders
- I am a B2B distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
- I manufacture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by 3rd party contractors - Consumer Goods Manufacturers
- I retail final consumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers
- I operate food retail outlets that use palm oil, palm kernel oil or related products - Retailers
- I am a conservation and environmental NGO supporting the sustainable development of the palm oil industry
- I am a social and human development NGO supporting the sustainable development of the palm oil industry

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

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

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)

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)	1.81
Total volume of crude palm kernel oil (tonnes)	0.00
Total volume of palm kernel expeller (tonnes)	0.00
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	5116.63
Total	5118.44

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	37
Palm kernel oil-based derivatives and fractions	63

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.

Countries/Regions	Percentage
Europe	17
North America	25
Malaysia	0
Indonesia	0
China	25
India	1
Latin America	1
Africa	0
Rest of World	31

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:

Description	Crude/Refined Palm Oil (CSPO)	Crude/Refined Palm Kernel Oil (CSPKO)	Palm Kernel Expeller (CSPKE)	Certified Derivatives and Fractions
RSPO Credits from Mill / Crusher	0.00	0.00	0.00	0.00
RSPO Credits from Independent Smallholder	0.00	0.00	0.00	410.00
Mass Balance (MB)	0.00	0.00	0.00	4706.61
Segregated (SG)	0.00	0.00	0.00	0.02
Identity Preserved (IP)	1.81	0.00	0.00	0.00
Total	1.81	0.00	0.00	5116.63

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

Description	Percentage
Certified Palm oil-based derivatives and fractions	37
Certified Palm kernel oil-based derivatives and fractions	63

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:

100.00%

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 the Roundtable on Sustainable Palm Oil's (RSPO) Principles and Criteria.

Since 2015, 100% of the palm-based ingredients 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 its palm-based ingredients³ 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. Initiatives include:

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.

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). In addition to helping to protect nature, the program fosters practices that recognize the economic challenges small holder farmers and their communities face and create practical solutions that protect their rights while also creating opportunities to thrive. Thus far, the initiative has helped support smallholder farmers through farmer trainings on no burning, organic farming, natural pesticides, RSPO certifications and the planting of seedlings of various species fulfilling ecological, economic and socio-cultural functions.

Purchasing Independent Smallholder RSPO Credits

In addition to our expanded portfolio of palm related positive impact projects, in 2022, we procured Independent Smallholder RSPO credits equivalent to 8% of our 2021 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.***

* Excludes palm-based ingredients not directly procured by ELC, such as those procured by Third-Party Manufacturers (TPMs) and certain acquired brands not yet fully integrated into the relevant ELC systems.

** Physical supply chain refers to a palm oil supply that is sourced from certified plantations under the Mass Balance, identity Preserved or Segregated certifications. More information on RSPO certified supply chains can be found here (<https://rspo.org/certification/supply-chains>)

***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".

Source: <https://www.elcompanies.com/en/our-commitments/viewpoints/palm-oil>

2.6 Please estimate the regional sales volume distribution of your company's RSPO certified palm oil, palm kernel oil and related products (as declared in Question 2.4) in the following countries/regions:

Countries/Regions	Percentage
Europe	17
North America	25
Malaysia	0
Indonesia	0
China	25
India	1
Latin America	1
Africa	0
Rest of World	31

3. TimeBound Plan

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

2022

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

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

-

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

2015

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

-

3.4 Which year did your company begin (or expects to begin) using only 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

3.4.1 If the previous target year has not been met, 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

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.

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)

- Participation in RSPO Working Group or Task Forces
- Support Independent Smallholders (ISH)
- Contribute to the RSPO Smallholder Trainer Academy
- Financial contribution to the RSPO Smallholder Support Fund
- Direct investments in Smallholder Certification projects
- Involvement/direct investments in Jurisdictional/Landscape approach
- Direct/collective investments in conservation and restoration initiatives
- Financial contribution to support members with Remediation and Compensation (RaCP) process, direct/collective investments in conservation and restoration initiatives
- Allocating FTE to promote the production or consumption of certified sustainable oil palm products
- Specific policies and action plans by the member to promote CSPO production or consumption in the upstream or downstream supply chain, including target dates or broader policies that include such efforts
- No activities planned
- Others

Other

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 the 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 ELC, such as those procured by Third-Party Manufacturers (TPMs) and certain acquired brands not yet fully integrated into the relevant ELC systems.

(Source: <https://www.elcompanies.com/en/our-commitments/viewpoints/palm-oil>)

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 (SR) requirements will be done through ACOP and MyRSPO. As the process of verification of the reports is in development, the Shared Responsibility section in ACOP may change in future ACOP cycles. Evidence to show compliance to the SR requirements shall be uploaded via your membership profile in MyRSPO. Please login to your MyRSPO account and upload the relevant policies, plans and relevant reports there. If you do not have a policy or your policy does not cover all items, you will be required to provide a Declaration of Support for the relevant policy items in your MyRSPO profile. Additional information on the required policies and plans applicable to all sectors as well as the annual uptake targets for supply chain actors can be found on <https://rspo.org/members/shared-responsibility> or email the Shared Responsibility team at sharedresponsibility@rspo.org.

Information & Public Availability

1.1 Does your company have organisational management documents publicly-available?

Yes

Ethical Conduct & Human Rights

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

Yes

1.2.1 Does the policy cover:

- Recruitment
- Contractors
- Suppliers and Sub-Contractors

Legal Compliance

1.3 Does your company comply with all applicable legal requirements?

Yes

1.4 Does your company require its third party contractors to comply with legal requirements, i.e. including a clause on legal compliance in the contracts?

Yes

Complaints & Grievances

1.5 Does your company have a Grievance Mechanism that is accessible to all affected parties?

Yes

1.5.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System?

Yes

Land Use & FPIC

1.6 Does your company have a publicly-available policy covering Commitment to respect Free Prior and Informed Consent (FPIC) in the Palm Oil Supply chain?

Yes _____

1.6.1 Does your company have a procedure in place to identify legal, customary or user rights, and people entitled to compensation?

No _____

Smallholders

1.7 Does your company support oil palm smallholders (groups)?

Yes _____

1.7.1 Does your company report on the actions to support the inclusion of smallholders?

Yes _____

Labour & Labour Rights

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

Yes _____

1.8.1 Does the policy cover:

- No discrimination and equal opportunities
- Pay and working conditions at least at legal or industry minimum standards and are sufficient to provide decent living wages (DLW)
- Freedom of association and Collective bargaining
- Protection of children, as well as the workforce of suppliers and third-party contractors
- Prevention of all forms of harassment, including sexual harassment
- No forced or trafficked labour

Occupational Health & Safety

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

Yes _____

1.9.1 Does your company have a Standard Operating Procedure (SOP) for Occupational Health & Safety?

Yes _____

Waste Management

1.10a Does your company have a waste management plan that includes reduction, recycling, reusing and disposal based on the hazardous characteristics?

Yes

1.10a.1 Is this plan implemented?

Yes

Water Management

1.11 Does your company have a water management plan to promote efficient use and continued availability of water sources?

Yes

1.11.1 Is this plan implemented?

Yes

Energy Use

1.12 Does your company have an energy use plan to improve the efficiency of the fossil fuels used and to optimise renewable energy?

Yes

1.12.1 Are there records of implementation of the plan ie. monitoring and reporting?

Yes

Climate Change & Greenhouse Gas (GHG)

1.13 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG) including identification and assessment of GHG emissions and implementation of a plan to reduce or minimise them?

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 2021, ELC gained traceability to the mill for over 79% of our palm volume purchased* in 2020. 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.

We are a founding member of Action for Sustainable Derivatives (ASD). This alliance of brands and suppliers aims to address responsible sourcing in the complex palm derivatives supply chain by collaborating to harmonize approaches on transparency, risk monitoring, and evaluation. Through our membership in ASD, we are 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. Additionally, through our ASD membership, we are able to leverage the dynamic monitoring of our traced supply chain through a shared grievance dashboard. Once a grievance is filed, the reports are reviewed and investigated. If substantiating evidence in support of a grievance is found, the grievance will be addressed through industry collaboration or through our own individual action as a company. (FY21 SI&S Report pg. 75)

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 ELC, such as those procured by Third-Party Manufacturers (TPMs) and certain acquired brands not yet fully integrated into the relevant ELC systems.

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?

- Communication and/or engagement to transform the negative perception of palm oil
- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- Engagement with peers and clients
- Promotion of CSPO through off product claims
- 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

Stakeholder Engagement:

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. We continue to communicate to our third-party manufacturers 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 the project.

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 Viewpoint: <https://www.elcompanies.com/en/our-commitments/viewpoints#palm-oil>

ELC FY21 Social Impact & Sustainability Report: <https://media.elcompanies.com/files/e/estee-lauder-companies/universal/our-commitments/2021-ss-report/elc-socialimpact-sustainability-report-fy21.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://www.elcompanies.com/en/news-and-media/newsroom/company-features/2020/earth-day>
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. The Ponderosa wind farm generated more than 57,700 megawatt hours (MWh) of power in fiscal 2021 (FY21 SI&S report pg. 60). As of fiscal 2021, our total solar capacity is 5.7 MW. During the fiscal year, we generated more than 5,000 MWh of solar energy, which is equivalent to the amount of carbon sequestered by 4,300 acres of U.S. forests in one year (FY21 SI&S report pg. 61).

In fiscal 2021, we continued to make progress toward our Scope 1 and 2 emissions reduction target through a portfolio of climate solutions, including on-site renewables, energy efficiency projects, green utility contracts, and renewable energy credits. We made progress toward our Scope 3 target by engaging with suppliers through CDP Supply Chain and establishing an internal governance structure to oversee emissions reductions. (FY21 SI&S Report pg. 58).

Source: ELC press release <https://www.elcompanies.com/en/news-and-media/newsroom/press-releases/2020/11-02-2020-171617374>

ELC 2021 CDP Climate Disclosure:
<https://media.elcompanies.com/files/e/estee-lauder-companies/universal/our-commitments/2021-si-s-report/elc-cdp-climate-response-2021.pdf>

ELC 2021 CDP Forest Disclosure:
<https://media.elcompanies.com/files/e/estee-lauder-companies/universal/our-commitments/2021-si-s-report/elc-cdp-forests-response-2021.pdf>

CDP Supply Chain (pg. 64 of FY21 SI&S report)

In fiscal 2021, we joined CDP Supply Chain and requested that more than 200 suppliers respond to the CDP Climate questionnaire. Collectively, these suppliers represent a significant amount of our total spend. We will use this supplier-provided data to help us calculate a portion of our Scope 3 footprint. In addition, we plan to use our suppliers' responses to identify potential areas of opportunity and collaboration.

Occupational Health & Safety:

FY21 SI&S Report, pgs 21-23

<https://media.elcompanies.com/files/e/estee-lauder-companies/universal/our-commitments/2021-ss-report/elc-socialimpact-sustainability-report-fy21.pdf>

Project Inobu additional info

"Inobu Mosaik Initiative

In Indonesia, rural households rely heavily on farming for their livelihoods, but often lack the land rights, resources and funding to farm responsibly. Through our company's participation in Action for Sustainable Derivatives (ASD), a collaborative initiative that brings together companies in the cosmetics, home, health and personal care, and oleochemicals industries to collectively tackle supply chain issues around palm derivatives, ELCCF has helped to fund the expansion of the Inobu Mosaik Initiative.

This initiative is a sustainable landscapes project focused on community-based restoration, fire-free agricultural livelihood development, and Roundtable on Sustainable Palm Oil (RSPO) certification of smallholder farmers in Central Kalimantan, Indonesia. The project has helped to progress the development of ASD's approach to collectively supporting impact on the ground. In addition to helping to protect nature, the program fosters practices that recognize the economic challenges Indigenous smallholder farmers and their communities face and creates practical solutions that protect their rights while also creating opportunities to thrive. Thus far, the initiative has helped support 589 individuals through farmer trainings on no burning, organic farming, natural pesticides, RSPO certifications and the planting of seedlings of various species fulfilling ecological, economic and socio-cultural functions.

ELC and its Charitable Foundation have long understood the importance of supporting local solutions to help address the intersecting challenges affecting global communities, but there's more work ahead of us. And it won't be easy. Through a continued investment and collaboration with partners around the world, we are furthering our efforts to take decisive action toward a low-carbon future and further a more just, equitable transition, not only within our walls but outside them too. By working together, we can unite our strengths and advance long-lasting solutions, bringing us one step closer to a sustainable, beautiful future."

<https://www.elcompanies.com/en/news-and-media/newsroom/company-features/2022/earth-month-2022>