

# Bath & Body Works®

## BATH & BODY WORKS GLOBAL ANTI-CORRUPTION POLICY

Bath & Body Works (the “Company”) prohibits all forms of corruption and requires compliance with applicable anti-corruption and anti-bribery laws worldwide. The Company has adopted this Global Anti-Corruption Policy (“Policy”), which applies to members of the Bath & Body Works Board of Directors, all associates (collectively, “Associates”), and all third parties (e.g., vendors, suppliers, contractors, etc.) acting on the Company’s behalf (“Third-Party Representatives”). This Policy is designed to help ensure that Associates and Third-Party Representatives fully understand and comply with the Policy and the Company’s associated anti-corruption compliance procedures.

All prohibitions and requirements set forth in this Policy apply equally to Bath & Body Works Associates and Third-Party Representatives performing services or conducting interactions on Bath & Body Works’ behalf.

This Policy further supports the Company’s Code of Conduct and reinforces our commitment to conducting business consistent with the highest ethical standards and legal requirements everywhere we operate.

## ANTI-CORRUPTION LAWS

Because Bath & Body Works is a global company, Associates and Third-Party Representatives must comply with all applicable anti-corruption and anti-bribery laws globally, including the US Foreign Corrupt Practices Act (“FCPA”), UK Bribery Act 2010 (“UKBA”), China’s Anti-Unfair Competition Law, and the laws of all countries where the Company operates. Associates must consult Global Ethics & Compliance whenever local laws conflict with this Policy before taking any action.

The primary focus of anti-corruption laws is to prohibit improper inducements to Government Officials. A “Government Official” is: (1) an officer or employee of a government or any department, agency or related instrumentality including state-owned or controlled companies; (2) an officer or employee of a public international organization such as the United Nations, World Bank, etc.; (3) a person acting in an official capacity for or on behalf of any such government, department, agency, instrumentality or public international organization; or (4) a political party, political party official or candidate for political office. Government Official also means a family member of any of the individuals described in this paragraph.

While many anti-corruption laws, including the FCPA and UKBA, focus on international business transactions, the laws of most countries in which Bath & Body Works operates also prohibit the bribery of domestic Government Officials. In addition, many jurisdictions have adopted commercial bribery laws which prohibit offering inducements to individuals in the private sector to influence or incentivize improper performance of a function or activity.

## ANYTHING OF VALUE

Associates and Third-Party Representatives must not – directly or indirectly – offer, promise, authorize or give Anything of Value to anyone, including Government Officials, with the intention to: (1) influence someone to obtain or retain business or gain an improper advantage; or (2) incentivize improper performance of someone’s business or professional obligations.

In addition, Associates must not – directly or indirectly – request, agree to receive, or accept Anything of Value as an incentive or reward for acting improperly.

For purposes of this Policy, “Anything of Value” is any item or benefit including, but not limited to, cash, cash equivalents (such as gift cards, gift certificates and merchandise discounts), loans, gifts, entertainment

(for example, concert, theater, sport or similar event invitations), meals, transportation, lodging, per diems, favors, job offers or business opportunities.

## FACILITATION PAYMENTS

Government Officials may sometimes request small payments or gratuities to expedite non-discretionary government actions, such as clearing customs or obtaining a travel visa, which the Company (or its Associates or Third-Party Representatives) are otherwise legally entitled to receive. These unofficial or non-published fees, not authorized by the government agency or department, are commonly known as “facilitation payments” or “grease payments.”

The Company strictly prohibits Associates and Third-Party Representatives from offering, promising, paying, or authorizing facilitation payments on the Company’s behalf, regardless of local custom or practice. If any Associate becomes aware of a request for a facilitation payment, they must promptly notify Global Ethics & Compliance in writing.

## HEALTH AND SAFETY PAYMENTS

There may be circumstances in which an Associate or Third-Party Representative is forced to make a payment to counter a threat of physical harm or unlawful detention. Such payments are allowed only if the Associate or Third-Party Representative believes in good faith that the threat is imminent, serious and credible. A minor delay or personal inconvenience does not justify a payment. Associates or Third-Party Representatives should immediately notify Global Ethics & Compliance in writing after a health and safety payment is demanded or made.

## GIFTS & HOSPITALITY

Associates and Third-Party Representatives may not offer or give Gifts and Hospitality to Government Officials (excluding nominal hospitality such as coffee, tea, water, etc., when customary in the context) without written pre-approval from the Global Ethics & Compliance Department.

For purposes of this Policy, the term “Gifts and Hospitality” includes cash or cash equivalents (gift cards, gift certificates, rebates and discounts), merchandise, personal favors, transportation, travel or vacation accommodations, business or employment opportunities (including internships), and anything else of value. Hospitality includes business meals, cocktails, tickets to events (sporting events, concerts, theater, etc.), other forms of entertainment, and related travel. Promotional or branded items that are of nominal value and that constitute reasonable and bona fide expenditures related to the promotion or explanation of the Company’s products are permissible. Associates should refer to Company guidance for monetary thresholds and further examples of permitted and prohibited items. Any exceptions require pre-approval by Global Ethics & Compliance. All gifts and hospitality must also comply with the Gift & Hospitality Policy in the Code of Conduct and must be properly reported and documented in accordance with the Company’s recordkeeping requirements.

## THIRD PARTY DUE DILIGENCE

All Third-Party Representatives, including (but not limited to) Bath & Body Works vendors, suppliers, contractors, retail partners, joint venture partners and other business partners must comply with anti-corruption and anti-bribery laws and this Policy. Third-Party Representatives must also ensure that all subcontractors and agents engaged to provide services to Bath & Body Works comply with this Policy.

Third-Party Representatives remain ultimately responsible for ensuring their subcontractors and agents comply with all anti-corruption and anti-bribery laws and Bath & Body Works' standards.

While Associates seeking to retain any vendor must follow the Company's Delegation of Authority Policy, some Third-Party Representatives require additional documented, risk-based review and enhanced due diligence. This includes individuals or entities that produce goods specifically for the Company or perform services that may involve interactions with external parties on the Company's behalf. Examples of such Third-Party Representatives include, but are not limited to, suppliers, lawyers, accountants, consultants, agents (e.g., travel or real estate), representatives, real estate brokers, investigators, contractors, project managers, developers, security providers, freight forwarders, consolidators and customs brokers.

Associates must comply with the relevant approval and setup procedures related to engaging and doing business with all third parties. In addition, as set forth in Company procedures, the Company must have written contracts with appropriate anti-corruption compliance provisions before Third-Party Representatives are authorized to provide any goods or perform any service, receive any payment, or commence operations. Associates must ensure Third-Party Representatives understand and comply with this Policy and are aware they will be subject to ongoing monitoring for compliance.

## CONTRIBUTIONS AND CORPORATE INVESTMENTS

Associates and Third-Party Representatives are prohibited from making political or charitable contributions on the Company's behalf or using Company resources or assets unless the contribution is pre-approved in writing by and complies with the Company's Foundation Grant and Corporate Giving Policy. The Company must exercise heightened scrutiny to ensure contributions are not used as indirect means of bribery, including those made through third parties. All contributions must be properly recorded and disclosed.

Global Ethics & Compliance must review proposed joint ventures, investments and acquisitions for anti-corruption purposes before transactions are completed. The Company prohibits indirect contributions, including through third parties, intermediaries, or organizations that could be perceived as a conduit for improper payments.

## RISK ASSESSMENT AND PROCEDURES

The Company maintains an effective global anti-corruption program, which includes regular identification, assessment and prioritization of anti-corruption risks, including an evaluation of the jurisdictions in which the Company operates, the markets for products and services, the extent to which Third-Party Representatives are engaged, and the degree of interaction with Government Officials. The Company has implemented and maintains controls designed to prevent and detect bribery and corruption and to monitor compliance with the global anti-corruption program.

## EDUCATION AND AWARENESS

Bath & Body Works has implemented and maintains a program to provide regular anti-corruption education and awareness to Associates. Training sessions include online courses and in-person presentations regarding anti-corruption laws and Bath & Body Works anti-corruption policies and procedures. Completion of training will be tracked, and the effectiveness of training programs will be periodically evaluated and enhanced as necessary.

## RECORDKEEPING

All transactions and payments must be accurately and completely recorded in the Company's books and records. Associates must never create, approve, or submit false or misleading documents. Third-Party Representatives are also required to comply with the recordkeeping requirements in this Policy and other related policies and procedures.

## SPEAK UP

Associates and Third-Party Representatives are encouraged to report any conduct that may violate this Policy, applicable laws, or related internal controls. The Company strictly prohibits retaliation against anyone who makes a good faith report or assists in an investigation.

Violations of this Policy may result in disciplinary action, up to and including termination of employment or business relationships, and may result in legal proceedings. The Company will cooperate fully with regulatory authorities in investigating and resolving any allegations of bribery or corruption.

Anyone may report concerns to Global Ethics & Compliance at [ethicsandcompliance@bbw.com](mailto:ethicsandcompliance@bbw.com), to the Company's Ethics Hotline at 1.888.884.7218, or at <http://www.bbw.ethicspoint.com>. Reports may be made confidentially and anonymously, as permitted by law.