



## UK MODERN SLAVERY ACT STATEMENT

### Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Newell Brands Inc. (“Newell”) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Newell Brands is a leading global consumer goods company. Newell rigorously applies high standards of corporate governance and ethics to its business and emphasizes transparency and accountability. Modern slavery encompasses slavery, servitude, human trafficking and forced labor. Newell is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organizational structure and supply chains

Newell has its headquarters in the US and is recognized as a leading global consumer goods company with a strong portfolio of well-known brands, including Paper Mate®, Sharpie®, Dymo®, EXPO®, Parker®, Elmer’s®, Coleman®, Jostens®, Marmot®, Rawlings®, Oster®, Sunbeam®, FoodSaver®, Mr. Coffee®, Rubbermaid Commercial Products®, Graco®, Baby Jogger®, NUK®, Calphalon®, Rubbermaid®, Contigo®, First Alert®, Waddington and Yankee Candle®.

We operate from over 100 locations worldwide, including the United States, Canada, the United Kingdom, France, UAE, Japan, China, Columbia and Brazil.

Newell is organized into the following 16 operating divisions: Home Fragrance Division; Fishing Division; Baby Division; Writing Division; Food Division; Appliances & Cookware Division; Outdoor & Recreation Division; Consumer & Commercial Solutions Division; Jostens Division; Waddington Division; Team Sports Division; Safety & Security Division; Process Solutions Division; Home and Family Division; Fine Writing Division; and Global eCommerce Division.

### Relevant policies

Newell operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Code of Conduct
- Supplier Business Ethics
- Global Procurement Policy
- Safety and Health Resources Policy
- Corporate Social Responsibility Policy

Newell’s Code of Conduct is the key to our continued growth and a commitment by every employee to an ethical workplace. Our Code helps us keep that commitment by reflecting our

values, putting our Company policies into practice and providing us with the information we need to make good decisions. Newell's code makes clear to employees the actions and behavior expected of them when representing Newell. Newell strives to maintain the highest standards of employee conduct and ethical behavior when operating abroad and managing its supply chain. Specifically, Section 2.2 of Newell's Code of Conduct states:

*“We prohibit labor practices that are inhumane or endanger the health and safety of the global workforce. We reject the following and will not knowingly do business with any individual or company that participates in:*

- *The exploitation of children, including child labor*
- *Physical punishment*
- *Forced or compulsory labor*
- *Unlawful discrimination and occupation*
- *Human trafficking*

*As part of our commitment to human dignity, we select vendors, suppliers and business partners who certify that they are committed to the health and safety of their workers, do not use forced labor or materials or goods produced by forced labor and implement supplier programs that ensure no materials used in our products come from sources that commit human rights violations.”*

Newell uses only specified, reputable employment agencies to source labor and verifies the practices of any new agency before accepting workers from that agency.

Newell is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labor. Newell works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Each supplier is required to acknowledge and agree to the Newell's Supplier Code of Conduct and serious violations of Newell's Supplier Code of Conduct will lead to the termination of the business relationship.

Newell encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Newell. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Newell's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact our anonymous Ethics Hotline.

### **Risk assessment and due diligence**

The greatest potential risk of slavery and human trafficking can exist in our supply chain. Newell believes that the risk of slavery and human trafficking is mitigated as a result of clearly established standards, oversight and quality controls within our sourcing process and business operations.

Newell undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Newell's due diligence and reviews include:

- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;

- conducting supplier audits or assessments through Newell's third party auditor;
- creating an annual risk profile for each supplier by rating each supplier using internal scorecard based on various methods; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our Supplier Code of Conduct, including the termination of the business relationship.

### **Performance indicators**

Newell has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, Newell is:

- requiring employees to complete Code of Conduct training on a periodic basis;
- developing a system for supplier verification and certification whereby Newell evaluates potential suppliers before they enter the supply chain; and
- auditing its existing suppliers through the use of an internal scorecard.

### **Training**

Newell requires key professionals within Newell to complete training on modern slavery on a periodic basis.

Newell's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labor engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within Newell;
- what steps Newell should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from Newell's supply chains.

### **Board approval**

This statement has been approved by Newell's Board of Directors, who will review and update it annually.



**Michael A. Todman, Chair of the Nominating/Governance Committee**