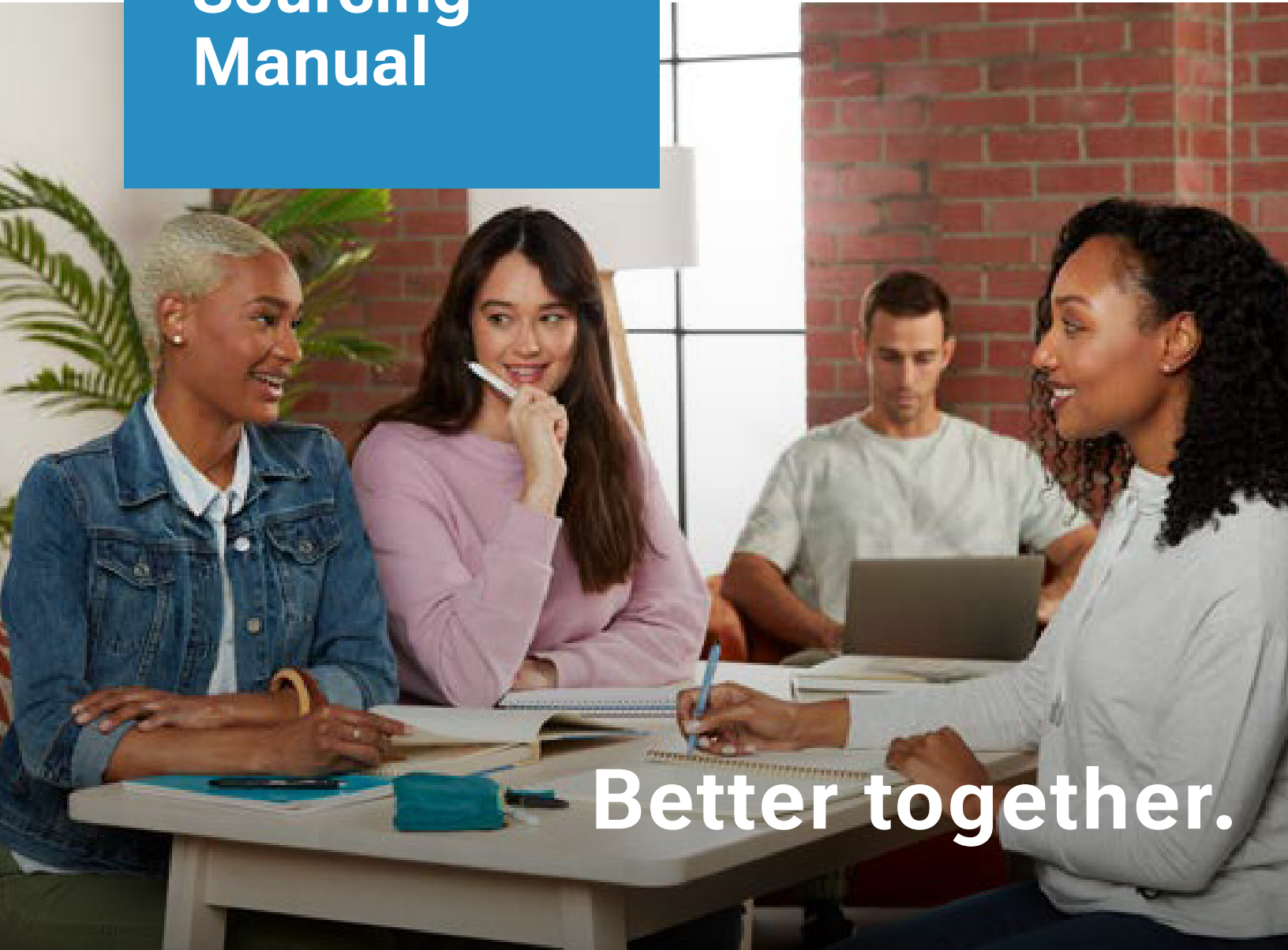




Responsible Sourcing Manual

newell
BRANDS



Better together.

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Better Together

Introducing Newell Brands, a house of leading brands that's so much greater than the sum of its parts.

LEARNING & DEVELOPMENT

KEY BRANDS

WRITING



BABY



HOME & COMMERCIAL

KEY BRANDS

HOME FRAGRANCE



COMMERCIAL



FOOD



HOME APPLIANCES



OUTDOOR & RECREATION

KEY BRANDS

OUTDOOR & RECREATION



Introductions

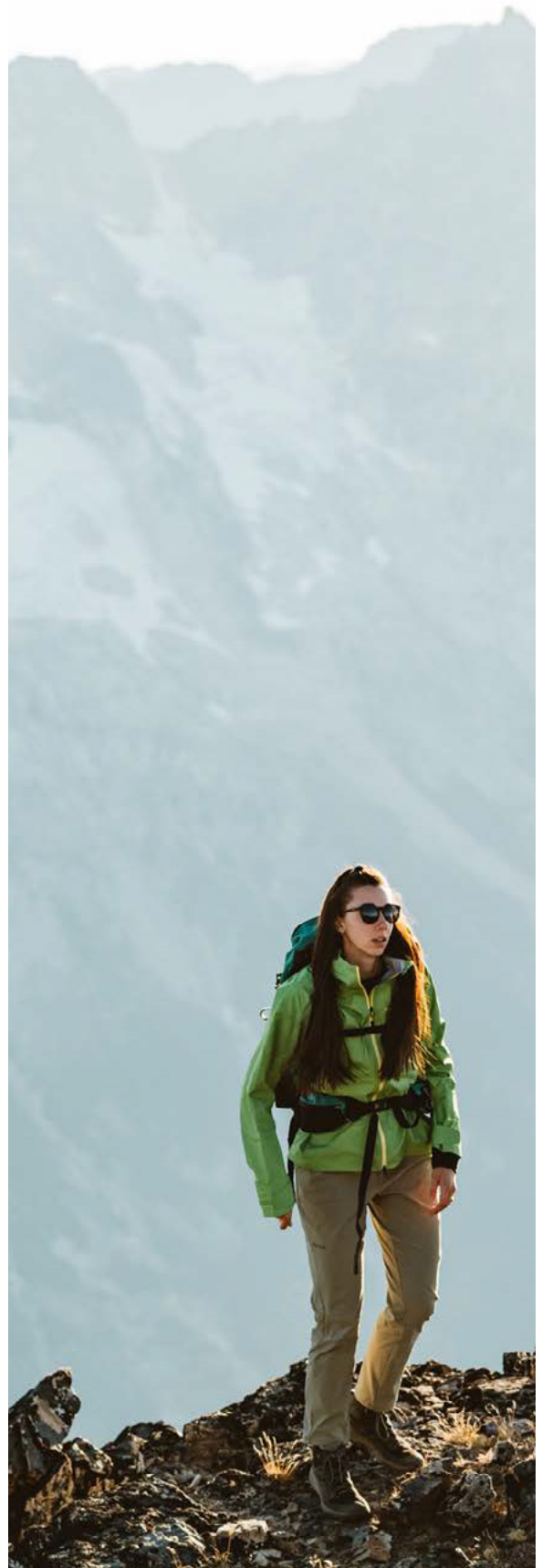
The purpose of our Responsible Sourcing Manual is to ensure our suppliers fully understand our Social Compliance and Supply Chain Security requirements and to assist suppliers with the implementation of our requirements in factories that are producing Newell Brands' products. This manual was developed to provide comprehensive guidance of our requirements and will provide you with all of the necessary information needed to raise and maintain your factory's standards.

Transparency and Supplier Development are key attributes to our Social Compliance and Supply Chain Security programs. We look forward to your active engagement and participation.

It is the expectation that suppliers will comply with the guidelines and requirements outlined in this manual. Failure to comply can result in termination of our business relationship.

To report any ethics or compliance concerns or any improper behavior from a Newell employee or 3rd party auditor please access this website (<https://secure.ethicspoint.com/domain/media/en/gui/52773/index.html>) to obtain the ethics hotline phone number for your country or email us at: Ethics@newellco.com

Newell Brands is dedicated to achieving carbon neutrality for all direct operations (scope 1 and 2) by 2040. Our 2023 Corporate Citizenship Report, scheduled for release in 2024, will include a disclosure of our baseline emissions. Additionally, we plan to create a scope 3 footprint that will outline emissions across our value chain, including all suppliers, in 2024. Upon completion, we may establish a scope 3 emissions reduction goal. As a supplier to Newell Brands, we will be reaching out to request emissions data to assist us in developing this footprint. Further communication will be provided in 2024. We are excited to collaborate with each of our partners to gain a better understanding of our impact and opportunities to safeguard people and the planet.



Administrative Procedures

Our Administrative Procedures play a crucial role in the successful achievement of all linked pertinent processes to achieve compliance. Such procedures should facilitate our tasks, and should bring the coordination and cooperation needed to fully incorporate.

Vendor Code of Conduct Compliance

All suppliers must review and acknowledge compliance with the Newell Brands Vendor Code of Conduct (VCOC). Annual certification/recertification on VCOC is required by Newell Brands' policy for all new and/or existing suppliers. Newell RS team conducts annual supplier training to review VCOC. The current version of VCOC is available at: <https://www.newellbrands.com/ethics-compliance>

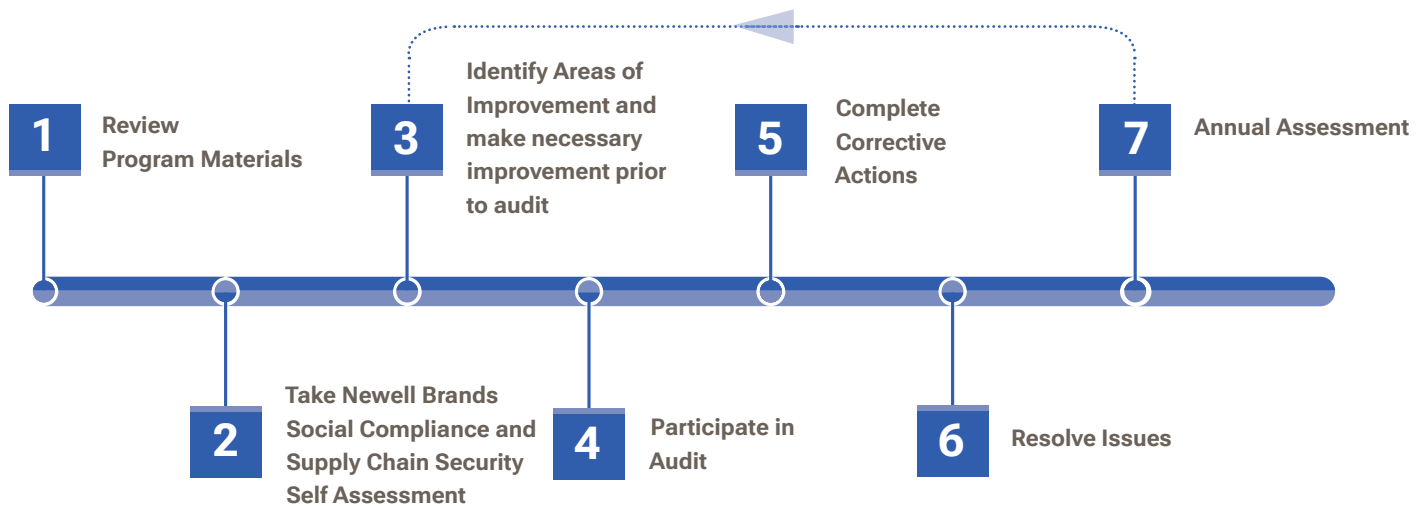
Social Compliance Selection and Supply Chain Security Criteria

The selection process for our suppliers has been set up to integrate social compliance standards with the supplier pre-qualification and approval process to further drive performance and to help source from suppliers that pose the least amount of risk to our organization.

It is the responsibility of the supplier to remediate all findings identified during the Newell Brands Social Compliance and Supply Chain Security Self-Assessment prior to the official audits taking place.

Once internal teams complete a supplier profile and if they want to pre-qualify a supplier, the initial documents will then be distributed by the Social Compliance and Supply Chain Security team. Upon receipt of said documents, these documents will be reviewed and audits will be scheduled based upon sourcing needs.





Escalation Process

The Escalation Process is in place to identify the people to contact in the event of an incident at a factory or for a supplier's low audit rating. In the event that a supplier receives an "F" rating or its equivalent or a Zero Tolerance rating or its equivalent, notifications will be sent internally to the Newell Brands teams that are involved with the particular supplier. Based upon the audit score, suppliers may be required to take mandatory capacity building projects which include training at their expense. In the event of a Zero Tolerance violation this will be escalated to the Newell Brands Zero Tolerance committee and if the finding is substantiated, our business relationship will be impacted and will most likely result in loss of business and termination of our business relationship.

Audit Scheduling

Upon receiving the required documents, the Responsible Sourcing (RS) team will make an assessment of the factory's compliance infrastructure and based upon sourcing expectations, an initial onsite Social Compliance and Supply Chain Security audit will be scheduled.

When an audit is scheduled, the factory will be notified of the audit date. If the audit cannot be conducted on the requested date, the factory must provide the RS team with a written statement within 48 hours briefly describing the reason(s) for the unavailability and a reasonable one-week window for rescheduling the audit.

After an audit date is confirmed, any request for an audit cancellation must be sent directly to the RS team.

Audit-Related Payment Process

Suppliers will be responsible for all costs associated with compliance. The costs include but not limited to the audit payments made to 3rd independent service providers.



Audit Result and Corrective Action

After the audit is completed, a Corrective Action Plan (CAP) will be provided to the supplier. Each CAP will highlight the audit findings and provide recommended corrective action(s). The supplier must complete the recommended corrective action(s) to have the issues resolved. The severity of the findings will dictate the timing for resolution of the findings.

Zero Tolerance Policy

Newell Brands takes human rights and responsible sourcing practices very seriously and we expect each of our suppliers to maintain similar commitments to human rights and responsible sourcing. As such, in order to engage in business activity with Newell Brands, all suppliers are required to agree and abide by our Vendor Code of Conduct.

There are certain violations that Newell Brands and our Customers deem as zero tolerance offenses. These types of violations will not be tolerated in any Newell Brands audits or audits from our Customers, including all audits that may be conducted on your factory such as Social Compliance, Supply Chain Security and Quality. If these types of violations are identified, our team will launch an investigation to validate the findings. If a zero-tolerance violation is validated, our business relationship will be impacted and will most likely result in loss of business and termination of our business relationship.

Factories are expected to have effective management systems in place to manage social compliance actively within their factory and to ensure there are no zero tolerance violations present. Factories also must ensure there are no banned materials present in our products and that there is no sourcing taking place in sanctioned countries or regions. The below violations are deemed as zero tolerance. Please ensure your entire factory is aware of Newell Brands stance on zero tolerance issues, what zero tolerance issues are and that you ensure your factory is in full compliance to these requirements.

Newell Brands Zero Tolerance Violations as defined in the Newell Vendor Code of Conduct:

- Child Labor
- Forced or Prison Labor
- Bribery attempts of any form
- Discrimination
- Harassment
- Corporal Punishment
- Unauthorized Subcontracting
- Falsified documents
- Denial of Access
- Circumvention of audit process
- Wastewater discharge into the environment without treatment
- Contraband contents in shipping Container
- Cross Border Smuggling

In addition to zero tolerance issues, if we find repeat violations or systemic issues in your factory, we may choose to terminate our business relationship. Our customers may also prescribe additional violations, in which case you may be subject to deactivation, termination, and/or even financial penalty. It is the supplier's responsibility to ensure they are proactively managing risk and understand the program requirements of Newell and our Customers.

Audit Scope

In order to build a healthy and smooth supply chain base for continuous supply of products to our valuable customers, Newell Brands arranges RS and SCS assessments at all suppliers, including suppliers who make components, raw materials and 2nd tier contractors. Suppliers are required to disclose and/or update all these related production locations



Audit Guidelines

Social Compliance and Supply Chain Security : Audit Criteria and Scheduling

Newell Brands and its affiliates have adopted a comprehensive Social Compliance and Supply Chain Security Program to ensure operation within the highest standards of business ethics and in accordance with all applicable laws and regulations. Our commitment to enhance responsible sourcing will support protecting employee safety, employee health, the well-being of the global community and the integrity of our supply chain.

Supplier Selection Process:

The selection process for our suppliers has been set up to integrate social responsibility standards with the supplier pre-qualification and approval process to further drive performance and to help source from suppliers that pose the least amount of risk to our organization.

All new suppliers are required to review and acknowledge compliance with the Newell Brands Vendor Code of Conduct. A Self-Assessment is to be completed within 10 working days of receiving the document. It is the responsibility of the supplier to remediate all findings identified during the Newell Brands Social Compliance and Supply Chain Security Self-Assessment prior to the Social Compliance and Supply Chain Security audit.

New suppliers are required to sign agreement to be complaint with US-CBP CTPAT standards

New Suppliers

All new suppliers must have initial Newell Brands Social Compliance and Supply Chain Security Audit conducted to ensure suppliers that are producing products for Newell Brands are abiding by the requirements outlined within the Newell Brands Vendor Code of Conduct. Suppliers must have a valid business license and comprehensive financial health verification prior Newell issuing business to a new supplier.

In addition, it is expected that all Newell Brands suppliers either new or existing maintain all legally required documents which include, but not limited to local governmental inspection reports and responses, health and safety related certificates/permits, building certificates, local government environmental certificates/permits, etc.

Existing Suppliers

When developing audit schedules for existing suppliers, Newell Brands Responsible Sourcing team will apply a risk- based audit approach. At a minimum every supplier will be required to participate in a Newell Brands audit every 24 months regardless of prior rating.

Newell brand RS team and Newell customers maintain the right to conduct unannounced audits of any disclosed location.



Audit Exemption Guidelines

The purpose of having Audit Exemptions Guidelines is to reduce redundant audits and allocate resources to supplier remediation and development.

All Suppliers

All shared industry audits accepted by Newell Brands are mapped to our Vendor Code of Conduct requirements and tied to an audit rating. Only suppliers that are in good standing with an overall rating of "A", "B" or "C" can provide a shared industry audit in place of a Newell Brands Social Compliance Audit or a Supply Chain Security Audit. These audits shall be conducted by auditors registered by the Association of Professional Social Compliance Auditors (APSCA), and at the expense of the suppliers. If a shared audit is approved the audit team will follow up on any corrective actions to ensure CAP closure and compliance. Suppliers are only able to share an approved industry audit once every 12 months.

Suppliers scoring "F" will be required to go through the Newell Brands Social Compliance or Supply Chain Security audit process. Suppliers will be held accountable for all fees associated with Newell Brands audit.

In addition to Newell Brands' audit guidelines, other customers may require industry audits on an annual basis. Suppliers are also responsible for covering the additional costs associated with customer audits.

Accepted Reports

- Business Social Compliance Initiative (BSCI)
- Better Work
- Responsible Business Alliance (RBA)
- International Council of Toy Industries (ICTI) CARE Program
- SEDEX Members Ethical Trade Audit (SMETA)
- Social Accountability 8000 (SA8000)
- Worldwide Responsible Accredited Production (WRAP)
- SCAN - Supplier Compliance Audit Network

Conditions of acceptance

1

No zero-tolerance (No Exception) violations or Immediate Resolution findings

2

Valid audit done in current calendar year or within 1 year period.

3

Supplier needs to provide Corrective Action Plans for findings as instructed by Newell Brands RS Team or SCAN audit team.

4

Supplier completes all required self-audit questionnaires.

5

Newell Brands and our Auditors will conduct onsite validation visits as needed to determine completion of Corrective Action Plans.



Audit Rating Definitions

Rating A Score 90 -100 No or a few minor issues identified, demonstrating high level of performance	Rating B Score 75-89 Major issue identified, meeting most of the standards	Rating C Score 60-74 Multiple Major issues identified, intervention needed	Rating F Score 0-59 Critical issue identified, strong intervention needed	Rating ZT Zero Tolerance issue identified
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Refer to the “Social Compliance and Supply Chain Security Issue Topics” section for further guidance related to audit item violations.

Follow-up audits for a “F” rating will likely occur within 6 months of the previous audit date, or as determined by Newell Brands. Follow-up audits for “C” rating will likely occur within 12 months. Moreover, all audit determinations will be made on a case-by-case basis based on the nature and level of non-compliance risks, the factory’s geographic location (high-risk, medium-risk, and low-risk), the type of remediation in place, and the level of confidence in the particular supplier.



Corrective Action Plan (CAP) Guidelines

Note: SCAN will administer the SCS CAPA's with the RS team (NTC) overseeing progress



Violation Category

State violation category per audit checklist



Violation Description

State the audit violation(s)



Recommendation

The corrective action(s) required (recommendations from the auditor).



Rating

State audit rating A / B / C / E / F per audit checklist



Failure Analysis

Factory must provide root cause of failure



Corrective Action Plan

The factory must include achievable corrective actions that will be implemented to resolve the non-compliance. The factory is required to provide a multi-step plan detailing each phase with specific deliverable and successive target dates for correcting violations that require some gradual or extended period for a full remediation.



Responsible Person

Enter person who is responsible for corrective action of violation



Completion Date

Enter date of completion only when the non-compliance is fully resolved



Improvement Evidence(s)

Submit supportive documentation (scanned copies, photos...) for a final evaluation by Newell Brands.

Suppliers will be responsible for reviewing findings within Newell Brands compliance software system (Rizepoint) and /or via CAPs provided by Newell RS team and submitting Corrective Actions accordingly.

All Critical findings are to be remediated with 60 days or less.



Enablement on Continuous Improvement

If an audit rating is assessed with F or below, the supplier might be requested to go through a capacity building process in addition to CAP completion requirement. Newell RS team will work with the supplier to determine the most suitable path forward based on 1) impact on the affected workers, 2) nature and risk level of non-compliances, 3) business impact, 4) suppliers' knowledge, capability, and resource availability, and 5) suppliers' commitment level.

If external resource is deemed necessary to support with remediation process, which includes but not limited to capacity building project taking, training event participation, E-Learning course taking, etc., the supplier is requested to bear all the cost related to such engagements as a commitment to improve performance and meet Newell's expectation.

In general, suppliers' factories are expected to improve the rating to at least C or above after the current phase of remediation/capacity building process is completed. If repeated F ratings or worse were received, the factories would be considered for deactivation, and potentially lose business with Newell and/or Newell customers.



The Following Steps Make Up the Audit Process:

There are certain violations that Newell Brands deems as “Zero Tolerance.” These types of violations will not be tolerated and will likely result in termination of our business relationship. All vendors are expected to have effective management systems and awareness training in place to manage social compliance within their respective factories and to ensure there are no zero tolerance violations present. Vendors must also ensure there are no banned materials from sanctioned countries or regions present in products sourced to Newell Brands. Vendor must make their factories aware of zero tolerance issues to ensure compliance with Vendor Code of Conduct requirements.



1. Pre-Audit Questionnaire

This is a set of questions completed by the supplier that is used to familiarize assessors and our company with the Social Compliance and Supply Chain Security practices and policies of the supplier. It is requested as part of the initial qualification of the supplier, as part of a periodic update because the previous questionnaire is more than two years old, or because the audit team feels enough has changed at the supplier since the last questionnaire to warrant a new one. The pre-audit questionnaire must be returned to the RS team by the required date.

2. Opening Meeting

Opening meetings are conducted with the supplier's top management and will entail introductions, a discussion on the pre-audit questionnaire, completion of integrity letter and verification of factory business license.

3. Factory Tour Guidance

During the factory tour, Newell Brand's auditor must be provided access and will visit all parts of facility, including but not limited to production area, warehouse area, fire control area, chemical/hazardous substance placement area, waste storage area, dormitory and canteen, packing, shipping, loading dock and cargo area, guard house, IT room, CCTV monitor system, seal locker, container inspection records and tools, perimeter fencing and other sensitive areas.

During the factory tour visit, auditors will do the following:

- Check whether the markings in production/warehouse are clear and reasonable; (e.g.: fire extinguisher location & label, PPE location, material placement and label, forklift access etc.).
- Check whether exit routes or exits for fire evacuation are safe and compliant with fire control regulations.
- Check all facilities for fire alarms, emergency lighting, sprinkler systems, fire extinguishers, smoke detectors and whether they are properly maintained and recorded.
- Check chemical/hazardous storage area to ensure the area is clear, chemicals are segregated, markings and storage are sufficient for the facility.
- Check the waste storage area to ensure it has clear marking, segregation area and disposal scheme
- Check the dormitory and canteen including all facilities (washbasins and water taps, lighting, shower and toilets).
- Review security measures and emergency evacuation plans to ensure they meet fire control requirements.
- Check factory for adherence to all Minimum Security Criteria that align with Global SCS programs (CTPAT, AEO, PIP, etc.)



4. Worker Interview

Employee interviews are an integral part of the process used to assess the effectiveness of the Social Compliance processes in place. All employee interviews will take place in a private area away from the production floor. No management or their representatives will be present. Employees to be interviewed will be selected by the audit team, not management for the supplier. This is normally done during the walk-through but may be done at any time.

TIER	AUDIT PROTOCOL	NUMBER OF WORKERS	WORKERS INTERVIEWS
1	Regular Audit Protocol	< 100	5 Employees at minimum
2	Regular Audit Protocol	101 to 200	10 Employees at minimum
3	Regular Audit Protocol	> 200	25 Employees

5. Document Review

The auditor will review documents to assess the facility's compliance with Vendor Code of Conduct. Documentation to be reviewed includes but is not limited to the following:

 Business License A	 Personnel Files B	 Workers' Contracts C	 Time Cards D	
 Payroll Records E	 Production Records F	 Security Records G	 Accident & Injury Records H	 Shipping Docs or Other Related Records I



6. On-Site Report Preparation

The auditor will collect information during factory tour, document review and worker interviews sufficient to identify, discuss and document the audit result during closing meeting.

7. Closing Meeting

A member of the manufacturing site management must attend the closing meeting. At the closing meeting, the audit team leader will summarize the audit results, make recommendations for changes/improvements that may be needed and discuss any questions the supplier may have. A member of supplier management must sign the audit results on the audit template and agree to develop and take corrective action for any findings noted during audit.

8. Publication of Audit Results

Audit results will be shared with suppliers and Newell Brands' internal teams. High risk findings will be put into our escalation process.

9. Follow-Up Audit

Audit will be scheduled to ensure findings have been resolved and factory has the appropriate management systems in place to meet compliance expectations.



Capacity Building And Continuous Improvement

We strive to continuously strengthen and enhance our responsible sourcing programs to ensure we mitigate risk, minimize negative impacts, and make a positive contribution to the businesses, people and communities we support through ethical business practices. To achieve it, we require all suppliers to embed spirits of “Transparency” and “Continuous Improvement” into daily compliance operation when working towards meeting Newell Brands Responsible Sourcing requirements. On a commitment to workers and to continuous improvement, we put the safety and interests of workers first and work to strengthen suppliers’ capacities to manage and mitigate risks in their value chains. If an issue is found, we work with suppliers to remediate the issue by prioritizing worker feedback and offering resources to help them invest in worker well-being and safe workplaces.

To help suppliers advance on the responsible sourcing journey, Newell Responsible Sourcing (RS) team provides training and webinars on topics that matter most.

Supplier training program focus on awareness building, best practice sharing, and continuous improvement supporting. The goal is to ensure compliance with the Vendor Code of Conduct and all related legal requirements. The trainings not only provide important updates and guidance for suppliers to meet program requirements, but also as an opportunity facilitate a two-way communication between Newell Brands and our suppliers.



Training program is delivered with multiple formats. In addition to regular supplier training events, we hold webinar trainings and virtual supplier roundtable meetings which are tailor made to address specific topics, such as effective management system developing, Newell's customer standard refreshing, force labor preventing, etc. Over the time, we expect suppliers to take more ownership and accountability managing compliance performance while continuously benefiting from training program. New E-Learning and an online-based Academy are expected to be developed to enhance learning experience. The training materials are shared on Newell Brands' platform (Rizepoint).

Suppliers are mandatorily requested to attend the training under the circumstance listed below, but is not limited to:

- a. **New supplier onboarding**
- b. **Strategic supplier capacity building**
- c. **Low performance supplier remediation supporting**
- d. **New initiative introduction and awareness building**
- e. **Special project engaging**
- f. **All others requested by Newell RS team**

Management Action Plan (MAP)

When an audit reveals a critical issue or recurring failures that have gone unresolved with a supplier, a Management Action Plan (MAP) is required to be implemented at the supplier's expense. MAPs include close partnership with suppliers and key internal cross-functional stakeholders to ensure that the supplier understands the root cause of the failure and makes changes to reduce the likelihood of recurrence. The program is customized for each supplier's circumstances focused on the specific area targeted for improvement.

Newell expects all suppliers to make full commitment and take responsible ownership to achieve improvements during the remediation process. Newell RS team will provide guideline and support throughout the process. With critical issues, we expect suppliers to show that meaningful progress towards remediation within a defined timeline is made, based on the issue. Meanwhile we recognize that some long-standing issues may come with complicated reasons behind, such as on the issue of excessive working hours (OT), which takes time to effectively remediate. With full transparency in mind, suppliers are requested to work on continuous improvement in a sustainable fashion. We believe a robust management system can support productivity while assuring continued compliance with our Vendor COC requirements, therefore we encourage suppliers to make effort, measure progress, and show impact on management system enhancement and workplace dialogue building.



Newell's Corporate Citizenship

Newell Brands has adopted 9 areas of focus. Our corporate citizenship philosophies guide our efforts to be a force for good and the tangible ways we're making a difference.

- Diversity, Inclusion and Belonging
- Employee Engagement
- Sustainability Governance
- Climate and Emissions Reduction
- Energy Management
- Waste Minimization and Diversion
- Product and Packaging Lifecycle innovation
- Human Rights and Responsible Sourcing
- Community Outreach
- Secure Supply Chains



Newell's Corporate Citizenship Philosophies.

Diversity, Inclusion and Belonging

We believe diversity, inclusion and belonging are critical to the success of our business and to helping attract, retain and develop the best talent. A diverse and inclusive workplace creates an environment rich with innovative ideas, and engage workforce and better solutions. We are committed to building inclusive teams that reflect the diversity of our brands and consumers.

Sustainability Governance

Our corporate citizenship approach is rooted in strong leadership. We have instituted a Corporate Citizenship Council with cross-functional senior leadership. The Nominating/ Governance Committee of our Board of Directors provides oversight of our programs and policies.

Energy Management

Energy is one of our largest impacts on the climate and natural resources. We work actively with our sites to improve efficient energy management, set reduction goals and implement energy-saving projects.

Employee Engagement

Our people are our greatest asset and drive our success through their passion and commitment. Through our company-sponsored programs, we encourage and support them to drive positive change across the organization. We celebrate our Sustainability Champions who are empowered to implement sustainability initiatives at their locations and our give@newell Ambassadors who help spread awareness of the many volunteer efforts and opportunities available across our organization.

Waste Minimization and Diversion

We are working to reduce waste to landfill and are committed to finding new ways to divert waste to more productive uses, including reuse and recycling.

Climate and Emissions Reduction

Climate change is one of our society's most pressing issues and we aim to lower emissions across our value chain. We've set GHG reduction, renewable energy, carbon neutrality and waste reduction goals to minimize our impact on the planet and people.

Product and Packaging Lifecycle innovation

Reducing the impact of our products and packaging is critical to reducing the environmental impacts throughout the life cycle of our products. We have developed design for sustainability guidelines and set packaging sustainability goals to source more sustainable materials and reduce waste.

Secure Supply Chains

Newell Brands fully supports Supply Chain Security (SCS) programs such as AEO, PIP and Customs-Trade Partnership Against Terrorism (CTPAT). We recognize the critical role they play in safeguarding global supply chains from potential security risks.

We understand that SCS is an essential tool that helps to identify and mitigate potential security threats and vulnerabilities, while also enhancing the efficiency of the supply chain. We are committed to working closely with our supply chain partners to ensure that all SCS requirements are met and that the program's standards are consistently upheld.

We recognize that formal SCS programs are a collaborative effort, and we are committed to actively participating in this effort to ensure that our supply chain partners, and our organization remain compliant and secure. We understand the importance of our collective responsibility to maintain a safe and secure supply chain.



Human Rights and Responsible Sourcing

Our suppliers and their employees are an extension of our team. We set stringent standards around ethical conduct and safe working conditions that our suppliers are required to meet. We also require our suppliers to maintain high standards through ongoing training, assessments and engagement.

Community Outreach

We have a responsibility to give back to the communities in which we operate through philanthropy, volunteer hours and in-kind donations. We are committed to partnering with nonprofit and give groups that align with our values to create change locally, nationally.

Sustainability

Newell Brands is committed to ensuring that the most sustainable practices are used when sourcing materials and manufacturing our products.

We are focused on improving sustainability at each phase of our products' development cycle from supply partners that share our focus on sustainability. Suppliers are responsible for monitoring their supply chain and are encouraged to incorporate our sustainability philosophies into their culture and operations to ensure we all are making a better tomorrow.

Newell Brands is dedicated to achieving carbon neutrality for all direct operations (scope 1 and 2) by 2040. Our 2023 Corporate Citizenship Report, scheduled for release in 2024, will include a disclosure of our baseline emissions. Additionally, we plan to create a scope 3 footprint that will outline emissions across our value chain, including all suppliers, in 2024. Upon completion, we may establish a scope 3 emissions reduction goal. As a supplier to Newell Brands, we will be reaching out to request emissions data to assist us in developing this footprint. Further communication will be provided in 2024. We are excited to collaborate with each of our partners to gain a better understanding of our impact and opportunities to safeguard people and the planet.

Operations Goals

Newell strives to make decisions through the lens of sustainability to ensure we remain responsible environmental stewards by reducing energy use and emissions, waste and our impacts on water and surrounding land of our facilities. Overall, we have set sustainability goals baseline and have committed to achieve the following. By sharing our goals, we are encouraging our suppliers to set similar goals for themselves.



*To learn more about Sustainability at Newell Brands please check out our website at <https://www.newellbrands.com/community/sustainability>."



Packaging Goals

Newell Brands is committed to responsible material choices and eliminating problematic materials from our packaging. In support, we set a goal in 2020 to eliminate the use of Polyvinyl Chloride (PVC) and Expanded Polystyrene (EPS) in all packaging by 2025. We ask that as a supplier to Newell you partner with us in achieving this goal by providing data to report progress annually and support alternative design solutions to replace these materials where they exist today

Source

100%

of our direct-sourced paper-based packaging from certified, verified or recycled sources

GOAL YEAR

2025



Eliminate the use of Polyvinyl Chloride (PVC) and Expanded Polystyrene (EPS) in all packaging

GOAL YEAR

2025



Use at least

20%

non-virgin (recycled content) in plastic packaging for Newell manufactured goods

GOAL YEAR

2025



Product And Packaging Sustainability

Product and Packaging Sustainability Vision

We aspire to share the future of responsible consumption by creating, products that are better for the environment and enable our consumers to live more sustainably.

Our Commitment

We are committed to innovating across our portfolio and dedicated to delivering quality products to customers and consumers that promote a circular future. We support responsible consumption through our commitment to product and packaging sustainability.

Supplier Sustainability

Sustainability has transitioned from a buzz word used by a few businesses to the standard means by which companies reduce their environmental impact, increase employee engagement, and improve profits. Increased sustainability is not contained within the walls of your facilities but can create positive change upstream and downstream for you. We have outlined a few topics and steps that you can take to increase your sustainability. We know when you increase your sustainability it benefits everyone so if you any questions about these or would like help please email us at sustainability@newellco.com.

As a Newell Brands Supplier we reserve the right to request sustainability KPI data from you including packaging bill of materials, operational and transportation emissions, and inspection measurements that support and drive efficiencies towards product, packaging, and operational sustainability improvement.



Sustainability Initiative Framework

Below is a framework to help guide you through a successful sustainable program or project. We recommend striving for balance over trade-offs. Sacrificing one pillar (people, planet, or profit) for another is not sustainable but when we view every project's need, implementation, and outcome through the lens of sustainability, a natural balance occurs.

Where too?	What does success look like for your initiative? (goal, certification, engagement)
Where from?	What do you know and what do you need to know? (data, baseline, talent)
Who's going?	Who needs to be involved and when? (team, internal, external, partnerships)
What's the story?	How will the story play out? (schedule, budget, urgency)

Measurements, Management, and Success

Reducing the environmental impacts of your operations is a necessary first step in your sustainable journey and there is a natural progression to do that: Measurement & Verification of Utility Consumption, Reduce Consumption and Increase Efficiencies, and Goals, Reporting, and Adjusting.

Measurement & Verification of Utility Consumption

Creating a system for tracking your utility consumption can be as simple or complex as necessary for your operations. The utilities we recommend you measure include electricity, fossil fuels (natural gas, heating oils, diesel, etc.), water, and waste (landfill and recyclables). If you have never measured your utilities from a sustainability standpoint, we recommend starting right now and without delay. Measuring and analyzing on a quarterly basis is a good place to start and as you progress you can transition into conducting a monthly analysis to help you discover utility usage inefficiencies and address them. As you are measuring these you should also overlay production and/or labor variables. This will give you a quick energy intensity assessment from which you can see how your consumption relates to production. Once you understand the utility consumption of your site(s) then you can begin to create programs and projects to make the necessary improvements to lower your utility waste and increase savings.

Reduce Consumption and Increase Efficiencies

After you understand the utilities of your site(s) and how they relate to your production it's now time to look at removing the waste while increasing efficiency. We recommend looking for quick and easy wins- lighting (LED conversion, controls), leaks (water and air), electrical (power-off, HVAC maintenance), waste (reduction, reuse, and recycling). A preventive maintenance, care and service program can help you identify, repair, and keep your production lines and building running optimally ensuring you are not wasting any energy or water. If you do not have people trained in energy and water efficiency there are several free resources on-line or you could engage external talent to help you identify and increase efficiency. We recommend engaging your utility providers to ensure your bill rates match your consumption profile.



Goals, Reporting, and Adjusting

Utilizing goals and reporting allows you the ability to show improvements and track success. If you have never set sustainability goals and objectives, we suggest starting with what you can control such as energy, water and waste. Your goals should be long-term whereas your objectives should be specific and measurable. Please remember not to create these in a silo but to get buy-in and support from various stakeholders and leadership. Your goals and objectives should not be achievable for where you are in your sustainability journey. We suggest you review your goals and objectives often and adjust your strategy as needed to ensure your best success.

Responsible Sourcing Guidance for the Supply Chain

Newell believes that sustainable sourcing of products is necessary in order to continue to meet the expectations of our customers and to help preserve the natural environment. Newell encourages suppliers to join us in working to reduce negative impacts through adoption of sustainable sourcing practices and increasing transparency and accountability throughout the value chain.

Pulp, Paper, & Timber

Our expectation is our suppliers will make responsible but timely progress in building the necessary systems and tools to adopt responsible sourcing approaches for pulp, paper, and timber. We are committed to sourcing fiber based packaging materials from certified, verified, or recycled sources including sourcing from sources certified to globally recognized forest, fiber, and chain-of-custody certification standards, including Forest Stewardship Council (FSC), Sustainable Forest Initiative (SFI) and Program for Forest Endorsement (PEFC) certification programs.

Palm Oil

We will strive to source palm oil from sources that provide protection for the environment as well as protection for its workers. Newell Brands is encouraging suppliers to improve their palm oil sourcing practices by sourcing in accordance to Roundtable on Sustainable Palm Oil (RSPO) standards.

Cotton

Suppliers to Newell Brands shall not source any Cotton from countries or areas subject to U.S sanctions. Newell Brands is encouraging all suppliers to evaluate their cotton sourcing methods to ensure they are in compliance with responsible sourcing practices.

Conflict Minerals

Conflict minerals include metals tantalum, tin, tungsten, gold, cobalt, and other derivatives extracted from metallic ore that are mined and sold in the Democratic Republic of Congo (DRC) and adjoining countries under circumstances that contribute to or support human rights violations. Newell Brands is committed to ensuring that the products it sells do not incorporate "Conflict Minerals." As required by the U.S. Securities and Exchange Commission (SEC), Newell performs due diligence into the source of such minerals and discloses the results. Newell Brands requires that suppliers perform due diligence into their respective supply chains to determine whether products supplied contain conflict minerals and to what extent those metals are sourced from conflict-free smelters. Suppliers are required to report their results to Newell Brands to ensure compliance with legal obligations and policy goals. Suppliers are encouraged to use free standardized reporting resources developed by the Responsible Minerals Initiative (RMI).

1. Food and Agriculture Organization of the United Nations (FAO).

2. <https://www.rspo.org/news-and-events/news/new-partnership-set-to-raise-profile-of-sustainable-palm-oil>



Newell Brands Vendor Code of Conduct

Newell Brands and its subsidiaries and affiliates (collectively, “Newell”) are committed to conducting business activities with the highest standards of business ethics and in accordance with all applicable laws and regulations. This Vendor Code of Conduct applies to all parties providing goods or services to Newell and their subsidiaries, affiliates and subcontractors (collectively, “Vendors”), whether organized, operating, or existing under United States law or the law of any other country, state, political union, municipality, administrative district, or other governmental authority. This Code establishes the standard of conduct Newell expects from our Vendors in a number of areas, including human rights, labor requirements, health and safety, environmental compliance and management practices. Newell will assess supplier compliance against our Code. Violations of our Code may result in corrective action, including termination of the business relationship with Newell.

Newell reserves the right to inspect and/or authorize a third party to inspect and audit, at any time, whether or not notice is provided in advance, all Vendors and any location where a good is designed, manufactured, assembled, handled, located, or retailed (“Factories”). Vendors shall also permit Newell’s customers to inspect and audit its Factories to the extent reasonably required or requested by such customer as a condition of it doing business with Newell. All such documentation must be accurate, free from any attempt to falsify or mislead and made available promptly upon request to any person of Newell conducting an audit.

All vendors are to notify Newell of any material information that impacts Newell Brands reputation or material issues that might disrupt supplier or a vendors’ ability to produce products or services per contractual obligations.



Zero Tolerance Issues

There are certain violations that Newell Brands deems as “Zero Tolerance.” These types of violations will not be tolerated and will likely result in termination of our business relationship. All vendors are expected to have effective management systems and awareness training in place to manage social compliance within their respective factories and to ensure there are no zero tolerance violations present. Vendors must also ensure there are no banned materials from sanctioned countries or regions present in products sourced to Newell Brands. Vendor must make their factories aware of zero tolerance issues to ensure compliance with Vendor Code of Conduct requirements.

Newell Brands Zero Tolerance Violation include:

- Child Labor
- Forced or Prison Labor
- Bribery attempts of any form
- Discrimination
- Harassment
- Corporal Punishment
- Unauthorized Subcontracting
- Falsified documents
- Denial of Access
- Circumvention of audit process
- Wastewater discharge into the environment without treatment
- Contraband Container Contents
- Contraband Contents in Shipping Containers
- Cross Border Smuggling

In addition to zero tolerance issues, if we find repeat violations or systemic issues in your factory, we may choose to terminate our business relationship. Our customers may also prescribe additional violations, in which case you may be subject to termination. It is the supplier’s responsibility to ensure they are proactively managing risk and understand the program requirements of Newell

Compliance With Laws And Regulations

Comply with all applicable laws in any country in which it conducts business and demonstrate actions in all cases that meet or exceed those required by applicable law. The term “applicable law(s)” means with respect to any Vendor, any domestic, foreign, federal, state, local or municipal statute, law, ordinance, policy, guidance, rule, administrative interpretation, regulation, order, writ, injunction, directive, judgment, decree or other requirement of any governmental entity applicable to such Vendor.

Anti-bribery And Anti-corruption

All Vendors must comply with all anti-bribery and anti-corruption laws worldwide, and conduct business with integrity. Vendors must never accept or provide anything of value, either directly or indirectly, in order to obtain an improper advantage or to obtain or retain business (e.g. money, gifts, meals and transportation). Vendors must have adequate procedures in place to prevent bribery in all commercial dealings undertaken.

Conflicts Of Interest

Vendors must avoid conflicts of interest situations. Newell defines a conflict of interest as being involved in a relationship or activity that affects, or has the appearance of affecting, your objectivity in making business decisions in the best interest of the company. Vendors must disclose to Newell any conflicts of interest situations that the Vendor is aware of.

Trade And Customs Compliance

Vendors must comply with all applicable laws and regulations related to the exportation and importation of products. In order to protect the integrity of cargo being shipped, Vendors must strive to comply with supply chain security processes and procedures consistent with U.S. Customs Trade Partnership Against Terrorism (CTPAT) and other relevant programs such as Authorized Economic Operator (AEO).





Discrimination, Harassment & Disciplinary Practices

Vendors shall not discriminate against their employees or prospective employees in hiring practices or other terms or conditions of work on the basis of race, color, national origin, gender, gender identity, religion, age, disability, political affiliation, sexual orientation, social or marital status, maternity, or membership in worker's organizations, such as unions, or any other similar factors.

Vendors shall not engage in the use or threat of corporal punishment, the use or threat of any type of abuse or harassment, including mental, physical (including sexual) or verbal, against its employees or the use or threat of any other form of intimidation. Vendors shall treat all of its employees with respect and dignity. All major disciplinary measures taken against employees shall be documented by Vendors.

Environmental

Vendors must comply with all applicable environmental protection laws. Vendors shall have an implemented environmental management system (EMS) and environmental emergency plan (EEP). It is the Vendor's responsibility to ensure there is never any illegal discharge or dumping of waste or wastewater into local water bodies, including rivers or streams.

Sub-contracting

Factories agree to perform all final manufacturing and assembly operations to produce products, and that they will not sub-contract the completion or substantially all of the manufacturing or assembly of the products unless Vendor obtains prior written approval from Newell. Vendors are responsible for notifying Newell of any plans for change of manufacturing locations. The sub-contracting of any work if permitted by Newell, shall not relieve Vendors from obligations hereunder, including, but not limited to, the obligation to require the companies providing goods and services to Vendors to comply with this Vendor Code of Conduct.

Freedom Of Association

Vendors should respect the rights of their employees to choose whether to associate with any lawful organization including labor organizations.

Health & Safety

Suppliers must provide their employees with a safe and healthy working environment, and where provided, a safe and healthy living environment. Suppliers shall comply with applicable worker safety laws and regulations which includes:

- o Building Integrity
- o Occupational Safety
- o Occupational Injury & Illness
- o Fire Safety
- o Emergency Preparedness
- o Machine Safeguarding
- o Chemical Safety
- o Sanitation, Food & Dormitory
- o Freedom of Movement

Conflict Minerals

Vendors shall implement procedures to assure that no products or materials supplied to Newell contain conflict minerals (columbite-tantalite (also known as coltan (tantalum, niobium), cassiterite (tin), wolframite (tungsten), gold, cobalt, or their derivatives) that directly or indirectly finance armed groups through mining or mineral trading in the Democratic Republic of Congo or an adjoining country. Upon Newell's request, Vendors will fully cooperate in responding to any country of origin inquiries regarding conflict minerals (including requesting information from its own suppliers); provide requested documentation; and/or certify its compliance with this provision by providing a sworn declaration of one of its officers, directors, or managing agents.



Monitoring Of The Vendor Code Of Conduct

Newell will review this Vendor Code of Conduct on a regular basis and will revise it to incorporate additional parameters when necessary. This Code is a general statement of Newell's expectations with respect to its Vendors. The Code should be read in conjunction with the Vendor's obligations set forth in the Responsible Sourcing Manual and in any agreements between Newell (or any of its operating divisions) and the Vendor.

It is the responsibility of the Vendor to ensure that it understands and complies with this Vendor Code of Conduct and to inform Newell (or a member of its management) if and when any situation develops that causes a Vendor to operate in violation of this Vendor Code of Conduct. Vendors are expected to self-monitor their compliance with this Vendor Code of Conduct, therefore, Newell strongly encourages Vendors to define and implement a policy for social accountability and to adopt or establish a management system to ensure that the requirements of this Vendor Code of Conduct can be met in a consistent manner.

In addition to any other rights Newell may have under any agreement it may have entered into with a Vendor, if Newell determines that any Vendor fails to comply with or breaches any terms of this Vendor Code of Conduct or has otherwise behaved in a manner that is inconsistent with the intent of this Vendor Code of Conduct, Newell reserves the right, in its sole and absolute discretion, to:

1. Terminate the business relationship with the Vendor, including the cancellation of any outstanding purchase orders, or
2. Require corrective actions within an acceptable time period and/or work with the Vendor for an acceptable remedial program in order for the business relationship to continue or resume.



Supply Chain Security Guidelines & Issue Topics

Supply Chain Security Standards

Newell is a member and partner of the U.S. Customs and Border Protection in the CTPAT (Customs-Trade Partnership Against Terrorism) program. In 2020 U.S. Customs released updated and new CTPAT requirements. These requirements are now referred to as the Minimum Security Criteria (MSC). In conjunction, the World Customs Organization (WCO) programs, PIP(Canada) and AEO (Europe and Latin America) are aligned with the standards of the CTPAT program and Newell recognizes Vendors and Factories who have obtained certification administered by these foreign Customs administrations.



Vendors and factories shall meet or exceed the following:

1

Adhere to security standards based on the Minimum Security Criteria to overcome potential threats posed by terrorism and smuggling activities in order to safeguard the supply chain.

2

Comply with security recommendations resulting from any third-party audit firm or properly designated security representative of Newell.

Vendors and factories must develop, implement and follow standard written security procedures, which address the following:

Compliance Management



It is a best practice for all Vendors and Factories to acquire membership in a World Customs Organization program such as CTPAT, AEO, PIP etc. Vendors and Factories that belong must ensure that their programs correspond to the Newell Supply Chain Security Guidelines

Upper Management Support



Newell suppliers must have the support of their upper management. Instilling security as an integral part of a company's culture and ensuring that it is a company-wide priority is in large part the responsibility of the company's leadership

Risk Assessment



The Newell suppliers must have a risk assessment that identifies vulnerabilities in their business plan including geographic location and supply chain risks.

Business Partners



Written policies and procedures to select business partners including customers, carriers, other manufacturers, product suppliers, vendors (parts and raw material suppliers etc.)

Cyber Security



Written policies and procedures to prevent suppliers' information systems and data, to include but not limited to intellectual property, customer information, financial and trade data and employee records. System must have protective measures to identify improper use, tampering and password control.

Container and Instruments of International Traffic Safety



Written policies and procedures to include container security, container inspection, container storage, seal security and storage.



Procedural Security

Security measures must be in place to ensure the integrity and security of processes relevant to document processing, transportation, shipping & receiving, cargo discrepancies and storage of cargo in the supply chain.

Agricultural Procedures

Written policies and procedures to ensure the prevention of visible pest contamination to include compliance with Wood Packaging Materials regulations.

Physical Security

Cargo handling and storage facilities in domestic and foreign locations must have physical barriers and deterrents that guard against unauthorized access. Building structures, fencing, gatehouses, locking devices, lighting should all be considered.

Physical Access Control

Written policies and procedures to prevent unauthorized access to facilities, maintain control of employees and visitors and protect company assets.

Personnel Security

Written policies and procedures to screen prospective employees and to periodically review current employees to include pre-employment screening, background investigation (when available) and termination procedures.

Security Education, Training and Awareness

Training awareness program established and maintained for all employees and contractors on policies and procedures related to CTPAT, security, business continuity, risk management and other specialized topics.

Newell is a member and partner of the U.S. Customs and Border Protection in the CTPAT (Customs-Trade Partnership Against Terrorism) program. In conjunction, the World Customs Organization (WCO) programs, PIP (Canada) and AEO (Europe and Latin America) are aligned with the standards of the CTPAT program which is a threat awareness program that identifies weakness in security procedures and introduces needed corrective actions to overcome potential threats posed by terrorist and contraband smugglers at each point in the foreign based logistical supply chain. Supply Chain Security (SCS) compliance carries valuable benefits and due to the global nature of Newell business activities, it is perceived as mandatory by many of Newell customers.

The Supply Chain Security Compliance Guidelines below will provide details in meeting the SCS criteria, highlighting the critical requirements. This document will serve as an important tool to assist factories in achieving SCS compliance.

TOPIC**1****Compliance Management**

It is a best practice for all Vendors and Factories to acquire membership in a WCO program such as CTPAT, AEO, PIP when applicable. Vendors and Factories that belong must ensure that their program corresponds to the Newell Supply Chain Security Guidelines including:

- Identify person(s) of responsibility for the program and liaison with governmental agency as applicable
- Establish a comprehensive manual based on the program criteria to include annual review of the policy and procedures, and update as needed
- Training program for all employees
- Identify international supply chain process and conduct a risk and vulnerability assessment



TOPIC

2

Upper Management Support

In promoting a culture of security, CTPAT Partners should demonstrate their commitment to supply chain security and the CTPAT Program through a statement of support. The statement should be signed by a senior company official and displayed in appropriate company locations. Support should include the following:

- Incorporate representatives from all relevant departments into a cross function team
- Point of Contact who is knowledgeable in CTPAT requirements
- Accountability (ADHERE TO written policy and procedure and identify who is accountable)
- CTPAT manual that is updated annually to meet updated criteria
- Reporting of regular updates and issues

TOPIC

3

Risk Assessment

Factories must conduct and document a risk assessment to determine the risk in their supply chains. Mapping should include the following:

- Mapping cargo flow including when cargo is at “rest”
- Business partners
- Manufacturing, distribution locations
- Modes of transportation
- Threat assessment
- Vulnerability assessment
- Audit assessment
- Action Plans

TOPIC

4

Business Partners

The facility must have written, verifiable processes and procedures used in the selection of business partners including material suppliers, manufacturers, and logistics service providers.

The facility must incorporate and require minimum supply chain security requirement language in contracts with a business partners.

Contracted business partners are required to conduct and provide an annual security risk assessment of their operation. These business partners include any contract services, such as security, transportation provider, freight consolidation or manufacturing labor.

TOPIC

5

Cyber Security

In today's digital world, cybersecurity is the key to safeguarding a company's most precious assets – intellectual property, customer information, financial and trade data, and employee records, among others. With increased connectivity to the internet comes the risk of a breach of a company's information systems. This threat pertains to businesses of all types and sizes. Measures to secure a company's information technology (IT) and data are of paramount importance, and the listed criteria provide a foundation for an overall cybersecurity program. CTPAT criteria is below:

Accountability – comprehensive written cybersecurity policies and/or procedures to protect information technology (IT) systems. The written IT policy, at a minimum, must cover all of the individual Cybersecurity criteria comprehensive written cybersecurity policies and/or procedures to protect information technology (IT) systems. The written IT policy, at a minimum, must cover all of the individual Cybersecurity criteria



TOPIC

5 Cyber Security (Continue)

1. Hardware
2. Software
3. Email and internet
4. Intrusion detection
5. Password automation
6. Regular reviews of IT infrastructure to identify vulnerabilities
7. If vulnerabilities are found, instate a corrective action plan.
8. User restriction based on job restriction
9. Data will be backed up once a week

TOPIC

6 Container & Instruments of International Traffic Safety

Written policies and procedures to include container security, container inspection, container storage, seal security and storage.

Container Security and inspection

- Policies and procedures must be in place to verify the physical integrity of the container structure prior to stuffing to include the reliability of the locking mechanism of the doors.
- Based on CTPAT and WCO standards it is recommended to follow the “seven-point” inspection process for all containers.

- | | | | |
|--------------|--------------|--------------------------|---------------|
| • Front Wall | • Right Side | • Ceiling / Roof | • Outside / |
| • Left Side | • Floor | • Inside / Outside doors | Undercarriage |

Container Storage

Containers must be stored in a secure area to prevent unauthorized access and/or tampering. Container doors should be secured by seals or positioned not to allow container doors to be opened (back to back). Policy and Procedures must be in place for reporting, preventing unauthorized access to the interior of the container and/or storage areas.

Seal Security and Storage

High security seals must be affixed to all loaded containers bound for the U.S. All seals must meet or exceed the current PAS ISO 17712 standards for high security seals.

Policies and Procedures to ensure seal security to include:

- Seal control and accountability
- Designated person(s) of responsibility
- Proper method to affix to the container
- Recognizing and reporting of compromised seals or container to proper authority
- Proper disposal of used seals.

Conveyance Security

Driver information should be recorded and retained for all departing shipments and written procedures in place instructing the drivers to take designated routes between the origin and the port. Transit routes from the factory to the port or next destination location should be randomly changed to minimize predictability. When applicable tracking technology should be used by the transportation company



TOPIC

7

Procedural Security

Security measures must be in place to ensure the integrity and security of processes relevant to document processing, transportation, shipping & receiving, cargo discrepancies and storage of cargo in the supply chain.

- Documentation Process:

- Legible
- Complete
- Accurate
- Protected against the exchange, loss or introduction of erroneous information
- Documentation control must include safeguarding computer access and information.

- Manifest Procedures to ensure the integrity of cargo received from abroad must be in place to ensure information received from business partners is reported accurately and timely.

- Shipping and Receiving:

- Cargo should be reconciled against the manifest
- Cargo should have accurate description
- Weights, labels, marks and piece count recorded and verified
- Departing cargo should be verified against the purchase order
- Drivers delivering or receiving cargo must be positively identified (photo ID) prior to cargo received or shipped

- Cargo Discrepancies, all shortages and overages and other anomalies must be resolved and/or investigated appropriately internally and externally. Customs and/or other appropriate law enforcement agencies must be notified if illegal or suspicious activities are detected. As appropriate based on current law or governmental structure.

TOPIC

8

Agricultural Procedures

Agriculture is the largest industry and employment sector in the U.S., an industry threatened by the introduction of foreign animal and plant contaminants such as soil, manure, seeds, and plant and animal material which may harbor invasive and destructive pests and diseases. Ensuring compliance with CTPAT's agricultural requirements will help protect a key industry in the U.S. and the overall global food supply.

Pest Contamination - Wood Packaging Materials (WPM)

Factories must have written procedures designed to prevent visible pest contamination to include compliance with Wood Packaging Materials (WPM) regulations. Visible pest prevention measures must be adhered to throughout the supply chain.

Newell Rubbermaid suppliers, vendors and transportation providers are required to inspect containers prior to loading for pest contamination. This is part of the Newell Brands 7 -point inspection process.



TOPIC

9

Physical Security

Cargo handling and storage facilities in domestic and foreign locations must have physical barriers and deterrents that guard against unauthorized access. Building structures, fencing, gatehouses, locking devices, lighting should all be considered.

The following CTPAT and / or WCO criteria should be implemented throughout the supply chain as applicable:

Fencing

Perimeter fencing should enclose the areas around cargo handling and storage facilities. Interior fencing within a cargo handling structure should be used to segregate domestic from international, high-value, and hazardous cargo. All fencing must be regularly inspected for integrity and damage.

Gates and Gate Houses

Gates through which vehicles and/or personnel enter or exit must be manned and/or monitored. The number of gates should be kept to the minimum necessary for proper access and safety.

Parking

Private passenger vehicles should be prohibited from parking in or adjacent to cargo handling and storage areas.

Building Structure

Buildings must be constructed of materials that resist unlawful entry. The integrity of structures must be maintained by periodic inspection and repair.

Locking Devices and Key Controls

All external and internal windows, gates and fences must be secured with locking devices. Management or security personnel must control the issuance of all locks and keys.

Lighting

Adequate lighting must be provided inside and outside the facility including the following areas: entrances and exits, cargo handling and storage areas, fence lines and parking areas.

Alarms Systems and Video Surveillance Cameras

Alarm systems and video surveillance cameras should be utilized to monitor premises and prevent unauthorized access to cargo handling and storage areas.

Alarms and video surveillance systems must have random periodic reviews of footage





Challenging and Removing Unauthorized Person(s)

Policy and Procedure must be in place to identify, challenge and address unauthorized/unidentified persons. Employees must be trained on the process to include reporting and escalation process

TOPIC

11 Personnel Security

Written policies and procedures to screen prospective employees and to periodically review current employees to include pre-employment screening, background investigation (when available) and termination procedures.

- Pre-Employment Verification Application information, such as employment history and references, must be verified prior to employment
- Background Investigations Background Checks/Investigations: It must be recognized that under Newell CTPAT and/or WCO standards business units should comply with foreign, federal, state and local regulations. Periodic checks and reinvestigations should be performed based on cause and/or the sensitivity of the employee's position.
- Personnel termination procedures must be in place to ensure identification badges are returned, facility, and systems access removed for terminated employees and/or contractors to include documentation.

TOPIC

12 Education, Training, and Awareness

Policy and Procedures must be implemented to ensure security and awareness training programs are established and maintained to recognize to include awareness of the threat of terrorism at each point in the supply chain. Employees and/or contractors must be made aware of procedures Newell has in place to react and how to report. The program should address but not limited to the following:

The Policy and Procedures must have periodic "refresher training" specific to signs of hidden compartments, concealed contraband in naturally occurring compartments and signs of pest contamination.

- | | |
|-------------------------------------|---|
| • Threat posed by terrorism | • Specialized training for shipping and receiving personnel |
| • Maintaining cargo integrity | • Handling unauthorized person(s) |
| • Recognizing internal conspiracies | • Loss prevention |
| • Protecting access control | • Bomb threats |

Additional training should be provided to employees and/or contractors assigned to shipping and receiving. The training should be specific to the following:

- Maintaining cargo integrity
- Recognizing internal conspiracies
- Protecting access controls



TOPIC

13

Heightened global enforcement of anti-forced labor compliance is leading to specific criteria for supply chain transparency

The reasons for this increased visibility are clear: Companies are under pressure from governments, consumers, NGOs, and other stakeholders to divulge more information about their supply chains. The reputational cost of failing to meet these demands can be high.

At Newell Brands Inc., we are committed to meeting the expectations of the governments where we do business and our customers. We are adhering to a single comprehensive program that will meet the most rigorous of these laws, regulations and consumer expectations.

In order to comply with the concept of “rebuttable presumption”, Newell Brands requires all suppliers to provide supply chain details that support our due diligence initiatives.

- Suppliers must be engaged in the Forced Labor risk assessment
- Suppliers will provide details on upstream raw materials and components including vendors names, locations/ addresses and contacts.
- Affidavits from each company or entity involved in the production process and an acknowledgement that a physical audit of their facilities will be welcomed.
- Suppliers agree to remediate any findings of Forced Labor or gaps in due diligence.
- Supplier agrees to provide Evidence Pertaining to Merchandise or Any Component Thereof
 - o Purchase orders
 - o Invoice for all suppliers and sub-suppliers
 - o Packing list
 - o Bill of materials
 - o Certificates of origin
 - o Payment records
 - o Seller’s inventory records, including dock/warehouse receipts
 - o Shipping records, including manifests, bills of lading (e.g., airway/vessel/trucking)
 - o Buyer’s inventory records, including dock/warehouse receipts
 - o Invoices and receipts for all suppliers and sub-suppliers
 - o Import/export records

