

Supplier Ethical Standards Manual and Procedures



Newell Consumer Brands



Newell Professional Brands



Baby & Parenting Essentials Brands



Table of Contents

1. Preface.....	6
2. Definitions.....	7
3. Newell Rubbermaid Supplier Ethical Standard Team (Global Sourcing)	8
4. Ethical Standards Assessment	10
5. Customs-Trade Partnership Against Terrorism.....	16
6. Assessment Scoring Criteria	17
7. Pass/Fail Criteria	18
8. Cost of Re-assessment	20
9. Ethical Standards Assessment Flow Chart	21
Appendix A. Supplier Code of Conduct.....	22
Appendix B. Letter to Suppliers	27
Appendix C. C-TPAT Questionnaire and Assessment Checklist...	29

Appendix D. Supplier Ethical Standard Corrective Action Report.. **33**

1. Preface

Our Supplier Code of Conduct sets forth the commitment of Newell Rubbermaid to do business with suppliers who share our commitment to fair and safe labor practices and ethical workplaces. Our Ethical Standards Manual and associated processes are in place to allow our partnership with suppliers to be one of fairness and trust both between our company and our suppliers and between our company and the customers that we serve around the globe.

With the above in mind, the general principles of our program are set forth in Newell Rubbermaid's Code of Conduct and Ethics and our Supplier Code of Conduct, which incorporates the flow down requirements of our customer's Ethical Standards. Newell Rubbermaid's Supplier Code of Conduct is located in Appendix A.

Compliance with these standards is verified through our supplier assessment program covered in greater detail later in this manual.

Collectively, our Supplier Code of Conduct and the assessment process defined in our Ethical Standards Manual are intended to set standards designed to improve the quality of life of the workers that make the merchandise we supply, comply with legal requirements wherever we operate in the world, identify our global ethical business practices, and insure business processes are in place that comply with the intent of our Supplier Code of Conduct.

2. Definitions

Newell Rubbermaid: Newell Rubbermaid, Inc. and its divisions.

Customer: A customer of Newell Rubbermaid.

Customs-Trade Partnership against Terrorism (C-TPAT): A voluntary US Government and business initiative that builds cooperative relationships to create a more secure supply chain. Incentives, such as fewer cargo examinations, a lower level of random compliance measurement examinations, expedited cargo processing at the border, 'front of line' inspection privileges at ports of entry if examination is required, risk score reductions, and penalty mitigation, are offered to businesses as they meet requirements of a tiered structure of criteria.

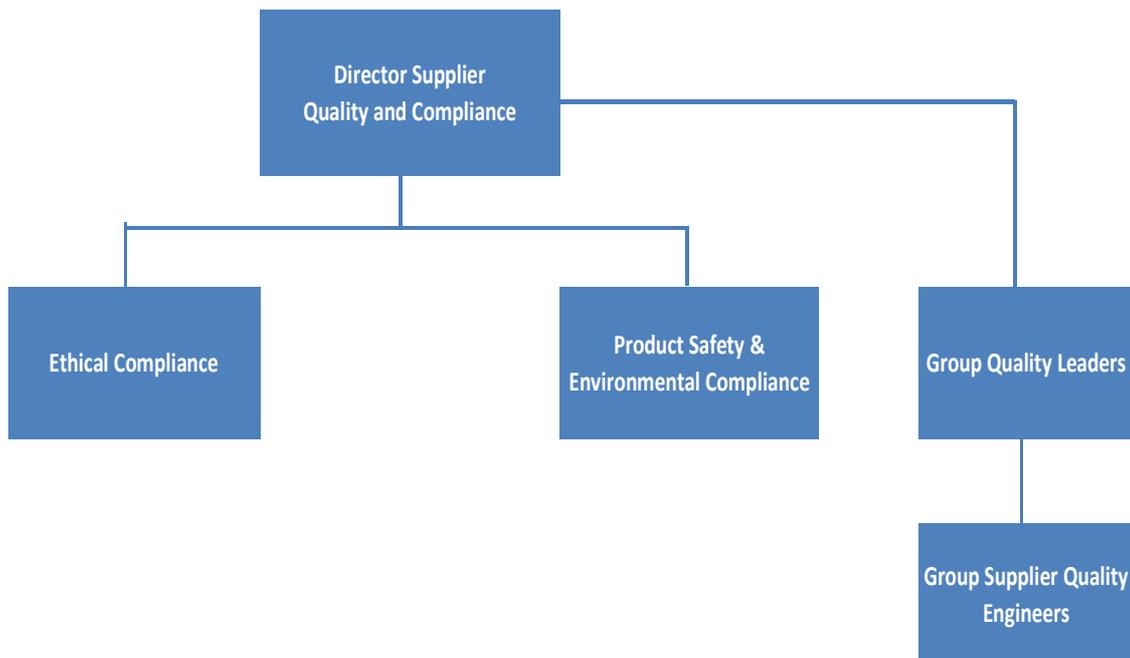
Follow-up Assessment or Re-Assessment: An assessment needed because of failure of a Newell Rubbermaid assessment.

Follow-on Assessment: An assessment needed because of failure of a customer assessment.

3. Newell Rubbermaid Supplier Ethic Standard Team (Global Sourcing)

3.1 Resources

Our Global Sourcing team is comprised of professionals who are dedicated to ensuring that the standards set forth in our Supplier Code of Conduct are adhered to by our suppliers. Additionally, this team leads and coordinates our internal programs focused on Newell Rubbermaid's efforts to comply with supplier standards imposed upon us by our customers such as WAL-MART, Costco, Lowe's and others.



GSA Resources for Supplier Compliance

Supplier Obligations

⋮

- 3.1.1 Suppliers are responsible for their compliance with our Supplier Code of Conduct. Suppliers are also expected to abide by all of the laws, regulations and other standards applicable to their particular industry.
- 3.1.2 Supplier management is responsible for informing all employees of our Supplier Code of Conduct and their obligations thereunder. Suppliers are responsible for ensuring that all records and documentation requested by Newell Rubbermaid is made available shall be available to submit to Newell Rubbermaid or its designated representatives and auditors.
- 3.1.3 Suppliers agree to perform periodic internal assessment to ensure compliance with Newell Rubbermaid's Supplier Code of Conduct.
- 3.1.4 Suppliers authorize Newell Rubbermaid or its designated representatives and auditors to conduct periodic assessments, as requested, to ensure the supplier is in compliance with the Newell Rubbermaid Supplier Code of Conduct.

3.2 Responsibilities of Newell Rubbermaid Global Sourcing

- 3.2.1 Newell Rubbermaid Global Sourcing is committed to executing its Supplier Code of Conduct (SCOC) and Ethical Standards in all areas of its business and will only engage business partners who share our commitment to the SCOC and Ethical Standards. Newell Rubbermaid expects all of its suppliers to adhere to the SCOC and our Ethical Standards, and will assist them in meeting their requirements.
- 3.2.2 Newell Rubbermaid Global Sourcing will not tolerate any vendors or suppliers who violate the laws of the country where they operate or who knowingly violates the standards set forth in our Supplier Code of Conduct. Newell Rubbermaid is prepared to terminate

partnerships with those suppliers who do not comply or take other appropriate action in accordance with these Ethical Standards.

3.2.3 The Global Sourcing assessment team is responsible for performing assessments before new suppliers are selected. An official assessment report is required and should be sent to Newell Rubbermaid Global Sourcing, the appropriate division of the company and other individuals within the company who have a legitimate reason to know of the results as confirmation of final qualification of the supplier.

3.2.4 For Direct Import (DI) suppliers, the Global Sourcing assessment team is responsible for performing a pre-assessment before the customer's assessment. A gap analysis and corrective action plan from the pre-assessment should be prepared by the supplier with the assistance and oversight of the Newell Rubbermaid Global Sourcing assessment team. The sourcing team will then follow the progress of the corrective actions outlined by the Supplier to ensure all actions are completed before the customer's final assessment.

4. Ethical Standards Assessment

An Ethical standards assessment may be required as part of supplier qualification, a periodic assessment, a random assessment, or a follow-up assessment due to failure of a Newell Rubbermaid or a Newell Rubbermaid's customer ethical standards assessment.

The following steps make up the assessment process:

1. Pre-Assessment questionnaire
2. Opening Meeting
3. Factory Tour Guidance
4. Workers Interview
5. Document Review
6. On-site Report Preparation
7. Closing Meeting
8. Publication of Assessment Results
9. Supplier Ethical Standard Corrective Action Report

10. Follow-up assessment

4.1 Visit Agenda for Ethical Standard Supplier

Visit Agenda for ES Supplier

1. Pre-Audit Preparation

1. Bring Pre- Audit Questionnaire
2. Bring Location Map of Factory
3. Bring Previous Report (If needed)
4. Bring Factory's CAR

2. Opening Meeting

1. Mutual Team Introduction.
2. Explain Gift & Gratuity Policy
3. Explain Audit Purpose, Scope & Procedure.
4. Explain Audit Guidelines Used
5. Make Statement of Confidentiality
6. ES checklist overview
7. Verify Business License
8. Review Factory Layout Map
9. Review Process Flow Chart

3. Factory Tour (Refer to factory tour guidance for details)

1. Check Production Facilities (Workplace, W/H etc.)
2. Check Dormitory

4. Worker's Interview

1. Select Appropriate Workers for Interview
2. Select Proper Interview Locations
3. Hold Combination Interviews (Group/Individual)
4. Use Interview Tactics

5. Document / Record Review

1. Review document list (eg: Employee Manual, SOP documents, Work instructions etc)
2. Review other Supportive records.

6. On-site Report Preparation :

1. Include all findings observed during the audit
2. Describe the Findings Adequately
3. Collect all the related evidence (documents & photos)

7. Closing Meeting

1. Closing courtesy for mutual discussion
2. Brief Good Practices of the Factory
3. Explain Audit Findings / Share Examples
4. Interpret Labor Laws Adequately

8. Overall

1. Labor Law Understanding
2. Effective Communication Skills
3. Time Management
4. Overall Approaches utilized

4.2 Pre-assessment questionnaire

This is a set of questions (Appendix D) completed by the supplier that is used to familiarize assessors and our company with the ethical standards practices and policies of the supplier. It may be 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 assessment team feels enough has changed at the supplier since the last questionnaire to warrant a new one.

Typically the pre-assessment questionnaire will be requested and sent by the assessment team that will be conducting an assessment or by the sourcing team/member completing the supplier qualification. The pre-assessment questionnaire should be returned to the requestor by the required date.

4.3 Opening Meeting

Opening meetings are conducted with the supplier's management and will entail introductions, a discussion on the pre-assessment questionnaire, where applicable, and verification of the factory/ manufacturing business license.

4.4 Factory Tour Guidance

During the factory tour, Newell Rubbermaid's internal auditor should 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.

During the factory tour visit, Newell Rubbermaid's internal auditor will do the following:

- Check whether the markings in production/warehouse are clear and reasonable; (eg: 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 and check all facilities for fire alarms, emergency lighting, sprinkler system, fire extinguishers, smoke detector whether it is effectively maintained and recorded;
- Check the area of chemical/hazardous storage whether it has clear area setting, segregation, marking and storage condition;
- Check the area of waste storage and observe whether it has clear marking, segregation and disposal scheme;
- Check the dormitory & canteen including all facilities (washbasins and water taps, shower & toilet equipment, lights etc) and review security measures & emergency evacuation plans are appropriately set up to meet fire control requirements.

4.5 Worker Interview

Employee interviews are an integral part of the process used to assess the effectiveness of the ethical standards processes in place. All employee interviews will take place in a private area away from the production floor. Approximately 15 to 25 employees will be interviewed. No management or their representatives will be present. Employees to be interviewed will be selected by the assessment team, not management for the supplier. This is normally done during the walk-through but may be done at any time.

4.6 Document Review

The Newell Rubbermaid auditor will also review documents to assess the facility's compliance with Newell Rubbermaid's Ethical Standards and Supplier Code of Conduct. Documentation to be reviewed includes but is not limited to the following:

- a) Business license
- b) Personnel files
- c) Workers' contracts
- d) Time cards
- e) Payroll records
- f) Production records
- g) Security records
- h) Accident & injury records
- i) Other related documents or records

4.7 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. The supplier will be required to submit a Corrective Action Plan (CAP) for any nonconformity identified.

4.8 Closing Meeting

A member of the manufacturing site management must attend the closing meeting. At the closing meeting, the assessment team leader will summarize the assessment 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 assessment results on the assessment template and agree to develop and take corrective action for any findings.

4.9 Publication of Assessment Results

Assessment results will be published on the Assessment Results Summary as part of the NR Checklist. Results will be formally provided to the supplier, Newell Rubbermaid's Global Sourcing management and the appropriate Division's Vice President of Sourcing along with the regional management team shortly after completion of the assessment.

4.10 Supplier Ethical Standard Corrective Action Report

Any individual item receiving a score of Critical (CRI 0 point) or Major (MAJ 0 point) will require a corrective action. Any Audit findings with score >0 may also require corrective action as deemed necessary by the lead auditor. A brief summary of corrective actions to be completed will be filled in by the supplier on the Assessment Results Summary & Supplier Ethical Standard Corrective Action Report and provided to the assessment team or designee for monitoring and distribution within 5 working days of receipt of the assessment results. A Supplier Ethical Standard Corrective Action Report for each item should be provided within 10 working days of the assessment results using Appendix D. All corrective actions are expected to be completed within 30 days of the Supplier submitting Appendix D (45 days total from initial assessment results) unless the lead assessor or designee agrees to a longer time period. Requests for an extension must be in writing by individual assessment finding needing correction and an extension. Updates on progress for corrective actions should be provided to the assessment team lead or designee weekly during the extension period or at other designated time frames determined by the lead assessor or designee until the corrective action is completed and closed.

4.11 Follow-up Assessment

If deemed necessary, a follow-up assessment will be done to validate that corrective actions have been successfully implemented and are providing the desired result(s). A follow-on assessment may also be conducted as a result of failing a customer assessment and should take place before the customer's re-assessment.

5. Customs-Trade Partnership Against Terrorism (C-TPAT)

Newell Rubbermaid has chosen to participate in the U.S. government's C-TPAT initiative to create a more secure supply chain. Thus, for suppliers that are Direct Import Suppliers it is necessary to fill-out and return a questionnaire concerning C-TPAT before the assessment. This questionnaire will be validated during the assessment and becomes part of the assessment results upon validation. See Appendix C for C-TPAT Questionnaire and Assessment Checklist.

6. Assessment Scoring Criteria

Audit findings should be based on on-site observation, document verification, employee interviews and information provided by the factory management.

Scoring System Judgment Criteria

Based on the on-site observation, document verification, employee interview and information provided by the factory management, the auditor is required to complete each question listed in sections 1 to 10 highlighted in the ES checklist.

- a. Each question is graded as 'Critical', 'Major' or 'Minor'. If the factory violates any 'Critical' issue, the overall result will be 'Unsatisfactory' regardless of what the total computed score is.
- b. The detailed scoring approach and principle is set forth below:
 - Where the maximum possible score is 3, the auditor should enter '3' if the factory complies with legal requirement or the client's expectation. Otherwise, the auditor should enter '0' if the factory does not comply with the legal requirement or NR's expectation.
 - Where the maximum possible score is 2, the auditor should enter '2' if the factory fully complies with legal requirement or NR's expectations.
 - If a factory partially complies with its legal requirement or NR's expectations, the auditor should enter '1' as the score.
 - If factory does not comply with the legal requirement or NR's expectations at all, the auditor should enter '0'.
 - Where the maximum possible score is 1, the auditor should enter '1' if the factory fully complies with legal requirement or NR's expectation.

- If factory does not fully comply with the legal requirement or NR's expectation at all, auditor should enter '0'.
- For questions involving 'Critical' grading, the only scoring options are auditor '3' for full compliance or '0' for non-compliance. Partial compliance is not applicable for critical grading questions.

7. Pass/Fail Criteria

We desire to have all of our suppliers achieve a perfect score but realize that this may not always be possible. With that in mind, the following are the overall pass/fail criteria for the assessment:

Approval - Total score is not less than 75% and no 0 score has been given for any individual major or critical item

Conditional Approval - Total score is between 60% and 75% and no 0 score has been given for any individual critical item

Unsatisfactory - Total score is lower than 60% and no 0 score has been given for any individual critical item

Denial – Regardless of the total score, if a supplier or potential supplier has been given a 0 for any critical issue, the result shall be “Denial”.

Assessment Failure – Critical Finding

An assessment may be failed (Unsatisfactory or Denial) by critical findings in certain areas:

- child labor
- forced labor
- harassment
- discrimination
- illegal transshipments
- bribery
- denial of access to documentation, factory tour or employee interview
- Unsafe working conditions / dormitory resulting in an immediate threat to the employees' life, limbs and functions.

Assessment failure for a critical finding in one of these areas for current suppliers may result in cancellation of current purchase orders, disqualification as a supplier, and denial of future business.

Assessment Failure – Access Denied, Document Review, Employee Interview

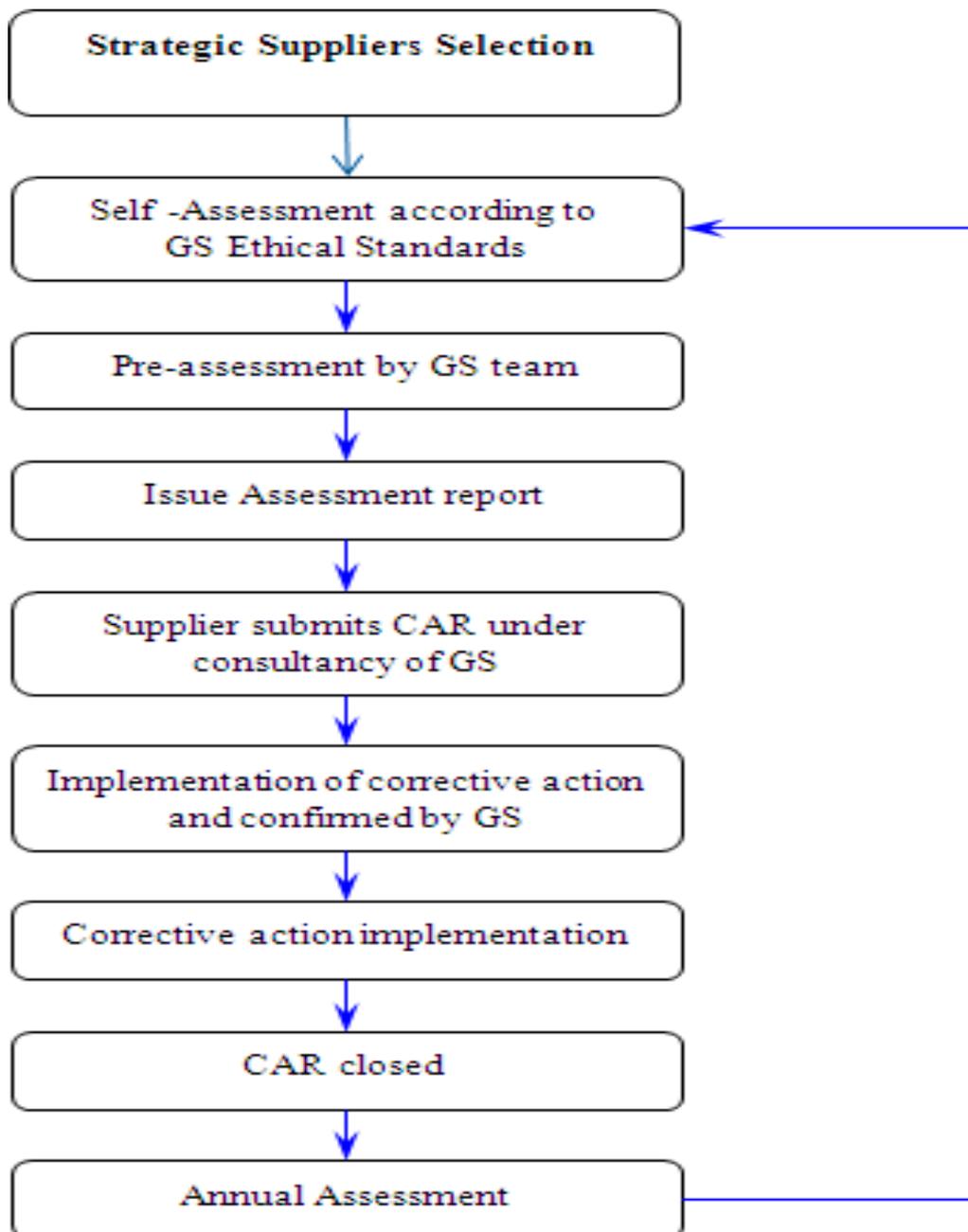
Access to supplier facilities and subcontractor facilities that produce Newell Rubbermaid products must be allowed as part of doing business and meeting our assessment requirements. This includes access to: (1) required documentation, licenses, and other paperwork required to validate assessment area, (2) employee dormitories and canteens; and (3) employees themselves. Failure to provide access to any of these will result in the failure of the assessment (Denial) and potentially loss of business with Newell Rubbermaid, including cancellation of current purchase orders, disqualification as a supplier, and denial of future business.

8. Cost of Re-assessment

The cost of a re-assessment, because of failure (Unsatisfactory or Denial), of a Newell Rubbermaid assessment will be borne by the supplier. A Newell Rubbermaid re-assessment may be conducted by a third party designated by Newell Rubbermaid at their discretion. The supplier will also bear the cost of any re-assessment by any Newell Rubbermaid customer, when the supplier fails the customer's assessment. In this instance, the supplier will also bear the cost of any Newell Rubbermaid follow-on assessment.

It is in the supplier's best interest to fully understand the ethical standards requirements of Newell Rubbermaid and its customers and to have policies, procedures, and processes in place to comply with them.

9. Ethical Standards Assessment Flow Chart



Appendix A

Supplier Code of Conduct

NEWELL RUBBERMAID INC. SUPPLIER CODE OF CONDUCT

INTRODUCTION

Newell Rubbermaid Inc. (Newell) is committed to conducting its worldwide business in an ethical, legal and socially responsible manner. This commitment extends to the suppliers with whom we chose to do business. Newell expects the same level of honesty and integrity of its supplier partners that it expects of its own employees. To clarify the exact nature of these expectations, Newell has prepared this Supplier Code of Conduct which applies globally to all suppliers and the associated sub-suppliers who are part of the supply chain. Compliance with this Code is expected for all suppliers and their sub-suppliers as the actions of those with whom we do business may be attributed to Newell and potentially adversely affects Newell's reputation or that of a particular brand within the Newell family.

All suppliers are expected to take all appropriate steps necessary to ensure compliance with this Code. Suppliers are also expected to be familiar with the business practices of their suppliers and any sub-contractors to ensure that they operate within the guidelines of this Code.

COMPLIANCE WITH LAWS AND REGULATIONS

A Supplier is required to abide by all applicable laws, regulations and standards applicable to its particular industry under the national laws of the countries where the Supplier is doing business. Suppliers are also expected to comply with the standards set forth in this Supplier Code of Conduct. Should the legal requirements and the standards of the industry or the provisions of this Code conflict, the Supplier must comply with the laws of the country in which the products are being manufactured. Suppliers should, however, strive to meet industry standards and the standards set forth in this Code whenever possible. If state or local legal requirements apply to the Supplier's manufacturing activities, the Supplier must comply with the state and local requirements. Suppliers shall actively assess and monitor the day-to-day management processes to ensure compliance with applicable laws and this Code of Conduct. Supplier shall also assure that employees are advised of the requirements of this Code.

EMPLOYMENT PRACTICES

Newell Rubbermaid expects Suppliers to respect its employees and to strive to improve conditions whenever possible and to be in compliance with the specific requirements relating to employment conditions contained herein.

- **Compensation & Benefits:** Suppliers shall provide wages, overtime compensation and benefits at not less than the minimum levels required by applicable laws and regulations or which are consistent with the prevailing local industry levels, whichever is higher. If local laws do not provide for overtime pay, suppliers will pay at least regular wages for overtime work

- **Working Hours:** Suppliers shall maintain employee work hours in compliance with the local standards and applicable laws of the jurisdictions in which the Suppliers are doing business. If local and/or national regulations regarding the number of maximum overtime hours that may be worked by individual workers do not exist, then the working hours should not regularly exceed 60 hours per week consisting of a maximum of 48 hours of regular hours and 12 hours of overtime. One day off in every seven days should be given. Newell Rubbermaid will not use Suppliers who regularly require workers to work hours in excess of the statutory requirements.
- **Child Labor:** Newell Rubbermaid respects the right of children to development and education. Exploitation of child labor is totally unacceptable. No person shall be employed at an age younger than the legal minimum age for working in any specific country or in absence of law, 15 years of age. If local law allows the minimum age of employment to be 14 years of age or younger, the minimum age of employment shall be 14 years of age. Employment of any individual below 14 years of age is strictly prohibited. In general, all employees under the age of 18 must: not be employed in hazardous work; must not work night shifts; and are entitled to more breaks than adults.
- **Forced Labor:** The use of forced or involuntary labor will not be tolerated by Newell Rubbermaid. Suppliers shall maintain employment on a voluntary basis. Newell will not work with Suppliers who directly or indirectly use in any manner forced labor, indentured labor, bonded labor or prison labor.
- **Human Trafficking:** Supplier shall maintain and commit to maintaining a work environment that is free from human trafficking. Newell Rubbermaid will not tolerate employment practices that include the recruitment, transportation, transfer, harboring or receipt of persons or through the use of force or the threat of force or through other forms of coercion, abduction, fraud, deception, abuse of power or by giving or receiving payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
- **Non discrimination, Harassment & Disciplinary Practice:** Newell Rubbermaid recognizes that cultural differences exist and different practices apply in various jurisdictions; however, the terms and conditions of employment should be based on an individual's ability to do the job, not on the basis of race, color, religion, sex, age, physical ability, national origin, or any other protected characteristic. Workers should be treated with respect and dignity. In terms of disciplinary practices, they should be fair, arbitrary and effective. Employees of our Suppliers must not be exposed to physical punishment, threats of violence or physical, sexual, psychological or verbal harassment or maltreatment.

- **Freedom of Association:** Suppliers should respect the rights of their employees to choose to associate with or not associate with or to establish any lawful organization including labor organizations.
- **Health & Safety:** Suppliers must provide their employees with safe and healthy working environment, and where provided, a safe and healthy living environment. Suppliers shall comply with all applicable worker safety laws and regulations which includes:
 - Building Integrity
 - Occupational Safety
 - Occupational Injury & Illness
 - Emergency Preparedness
 - Machine Safeguarding
 - Chemical Safety
 - Sanitation, Food & Dormitory

ENVIRONMENTAL

Suppliers shall comply with all applicable environmental laws and regulations. This shall include having processes in place to ensure compliance with those regulations relating to the handling, recycling, and disposal of dangerous or hazardous materials. Newell Rubbermaid favors suppliers that share its commitment to sustainable business practices.

SECURITY

Suppliers will maintain adequate security at all production and warehousing facilities and implement supply chain security procedures designed to prevent the introduction of non-manifested cargo into outbound shipments. Each Supplier facility must have written security procedures to document proof of adequate security controls.

Newell has made a voluntary application to the United States Customs and Border Protection authorities under the Customs and Trade Partnership Against Terrorism (C-TPAT). C-TPAT is a joint initiative between the American government and business community for the purpose of maximizing security in connection with the import of goods into the United States. Newell has been approved as a C-TPAT partner. Approval applies to Newell's entire supply chain. Approval includes assessment of Newell divisions by U.S. Customs authorities. Newell's participation as a C-TPAT partner mandates that our Suppliers also observe the C-TPAT requirements for assuring that our product supply chain is secure from terrorist threats. Direct import suppliers must respond to Supplier self-assessment questionnaires if requested.

GIFT & GRATUITY POLICY

Newell Rubbermaid employees are prohibited from soliciting or accepting any gifts, gratuities or other monetary incentives that are designed to improperly influence business decisions or as a condition of doing business. The Supplier has an

affirmative duty to report any such request or demand immediately to Newell. Certain business courtesies are not prohibited. Employees may accept gifts that are infrequent and nominal in value; occasional and reasonably-priced meals with a business contact or which are otherwise reasonable and customary, in countries where custom requires such courtesies so long as the receipt of these gifts does not suggest a conflict of interest or give the appearance of an improper attempt to influence business decisions. We expect our Suppliers to adhere to these gift giving guidelines.

CONFLICT MINERALS

Supplier shall implement procedures to assure that no products or materials supplied to Newell Rubbermaid contain conflict minerals (columbite-tantalite (also known as coltan (tantalum, niobium)), cassiterite (tin), wolframite (tungsten), gold 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 Rubbermaid's request, Supplier 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 SUPPLIER CODE OF CONDUCT

Newell Rubbermaid will review this Supplier Code of Conduct on a regular basis and will revise it to incorporate additional parameters when necessary. Suppliers are invited to contribute towards the further development of the Supplier Code of Conduct.

Newell Rubbermaid shall have the right to periodically inspect Suppliers and their facilities to verify compliance with this Code either directly or through a third-party. Such inspections may be conducted without notice to the Supplier. Suppliers are also required to disclose all material facts relating to production of products for Newell Rubbermaid upon request.

This Code is a general statement of Newell Rubbermaid's expectations with respect to its Suppliers. The Code should be read conjunction with the Supplier's obligations set forth in any agreements between Newell Rubbermaid (or any of its operating divisions) and the Supplier. In the event of a conflict between this Code and any such agreement, the agreement shall control.

Appendix B

Letter to Suppliers

Jan 2012

Dear Valued Supplier,

Newell Rubbermaid Inc. (Newell) values the strong relationship we have with our customers and suppliers. We believe that by establishing and maintaining a balanced set of ethical standards, we will continue to build these relationships.

Newell first developed and implemented its Supplier Ethical Standards and Procedures Manual beginning in January 2007. We regularly update this Manual and will send out a copy of the document once a year to make sure all existing and new suppliers have the latest version of the policy and are familiar with its requirements and procedures.

This program primarily consists of 3 parts.

1. Suppliers will be required to schedule assessments and pre-assessments for supplier qualification as a requirement of doing business with us.
2. Periodic, and at times unannounced, assessments of our suppliers to be conducted and required by Newell Rubbermaid and its customers.
3. Adherence to our Supplier Code of Conduct.

Newell requests that you complete and forward your supplier assessment reports to the Vice President Global Sourcing and Vice President of the relevant division(s) with whom you're doing business on the form contained in the Manual.

The supplier assessment status report should contain all assessments requested by and scheduled with customers, assessment findings, assessment ratings, and corrective actions requested and made. These reports should be updated as changes occur or at a minimum on a monthly basis.

A dedicated e-mail address, ES-Audit@newellco.com, is available to collect supplier assessment reports and corrective action plans. Suppliers may communicate with Newell Rubbermaid regarding ethics and compliance issues or questions through this same e-mail address.

Best Regards,

Carolin Heete
Vice President of Global Sourcing,
Newell Rubbermaid, Inc.

Appendix C

C-TPAT Questionnaire and Assessment Checklist

C-TPAT Security – Suppliers Assessment

SUPPLIER Name:	
Factory Name & Address:	
Assess-mentor Name:	
Assess-mentor Title:	
Date of Assessment:	

1. Physical Security			
	Question	Yes	No
1.1	Are buildings constructed of materials that resist unlawful entry?	<input type="checkbox"/>	<input type="checkbox"/>
1.2	Are entrances and exits to the warehouse/distribution center monitored?	<input type="checkbox"/>	<input type="checkbox"/>
1.3	Are external and internal doors, windows and fences protected by appropriate means?	<input type="checkbox"/>	<input type="checkbox"/>
1.4	Are intrusion alarms used to detect unauthorized entry after hours?	<input type="checkbox"/>	<input type="checkbox"/>
1.5	Are external doors and windows linked to the alarm system?	<input type="checkbox"/>	<input type="checkbox"/>
1.6	Are windows sealed or secured with protective/bars?	<input type="checkbox"/>	<input type="checkbox"/>
1.7	Are exit doors reinforced?	<input type="checkbox"/>	<input type="checkbox"/>
1.8	Are dock doors constructed of materials that prevent unlawful entry?	<input type="checkbox"/>	<input type="checkbox"/>
1.9	Are dock doors closed and locked unless a shipment is being received or dispatched?	<input type="checkbox"/>	<input type="checkbox"/>
1.10	Is parking for employees & visitors separate from the dock and cargo areas?	<input type="checkbox"/>	<input type="checkbox"/>
1.11	Is lighting both inside and outside the facility adequate to eliminate dark corners?	<input type="checkbox"/>	<input type="checkbox"/>
1.12	Is flood lighting used on loading and unloading areas?	<input type="checkbox"/>	<input type="checkbox"/>
1.13	Are dock doors illuminated at night?	<input type="checkbox"/>	<input type="checkbox"/>
1.14	Are clear zones maintained around the facility (i.e., are brush and growth cleared from the perimeter barrier)?	<input type="checkbox"/>	<input type="checkbox"/>
1.15	Are communication systems in place to contact internal security personnel or local law enforcement officers in the event of an emergency?	<input type="checkbox"/>	<input type="checkbox"/>
1.16	Is international and domestic cargo segregated and marked?	<input type="checkbox"/>	<input type="checkbox"/>
1.17	Is dangerous goods cargo segregated and stored in a safe area?	<input type="checkbox"/>	<input type="checkbox"/>
1.18	Is high-value cargo segregated and stored in a safe, caged or fenced-in area?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			

2. Access Controls			
	Question	Yes	No
Facility Access			
2.1	Does the facility have a formal ID system for permanent and temporary employees?	<input type="checkbox"/>	<input type="checkbox"/>
2.2	Do the ID badges display both the employee's name and a photo?	<input type="checkbox"/>	<input type="checkbox"/>
2.3	Must employees show their badges upon entering the facility?	<input type="checkbox"/>	<input type="checkbox"/>
2.4	Are badges color-coded to help distinguish workers' assigned areas?	<input type="checkbox"/>	<input type="checkbox"/>
2.5	Are employees required to wear uniforms?	<input type="checkbox"/>	<input type="checkbox"/>
2.6	Is there a controlled access gate to monitor activity coming in and out of the facility?	<input type="checkbox"/>	<input type="checkbox"/>
2.7	Is there a formal registration process to document visitors to the facility?	<input type="checkbox"/>	<input type="checkbox"/>
2.8	Is access to loading docks limited to those employees approved or scheduled to work on the loading docks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.9	Do employees escort visitors while in a loading facility or warehouse?	<input type="checkbox"/>	<input type="checkbox"/>
2.10	Do employees or security personnel challenge unknown or unauthorized persons in the facility?	<input type="checkbox"/>	<input type="checkbox"/>
2.11	Are truck drivers granted limited access to the facility and supervised at all times?	<input type="checkbox"/>	<input type="checkbox"/>
Data Access			
2.12	Are networks containing sensitive data secured to prevent unauthorized access to such data?	<input type="checkbox"/>	<input type="checkbox"/>
2.13	Are individual computer workstations password-protected?	<input type="checkbox"/>	<input type="checkbox"/>
2.14	If information is available in the public domain (e.g., the Internet), is it protected by a firewall?	<input type="checkbox"/>	<input type="checkbox"/>
2.15	Is access to sensitive information and/or systems limited?	<input type="checkbox"/>	<input type="checkbox"/>
2.16	Is a log of computer/building access rights maintained?	<input type="checkbox"/>	<input type="checkbox"/>
2.17	If an employee separates from the company are the access rights revoked?	<input type="checkbox"/>	<input type="checkbox"/>
2.18	Is there a documented procedure in place to ensure that all access rights are revoked?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			

3. Procedural Security			
	Question	Yes	No
Shipping & Receiving			
3.1	Is the introduction and removal of cargo and packages supervised by a designated security officer?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.2	Do you ensure that all merchandise is properly marked?	<input type="checkbox"/>	<input type="checkbox"/>
3.3	Do you ensure that all merchandise is properly counted?	<input type="checkbox"/>	<input type="checkbox"/>
3.4	Do you ensure that all merchandise is properly weighed?	<input type="checkbox"/>	<input type="checkbox"/>
3.5	Do you ensure that all merchandise is properly documented?	<input type="checkbox"/>	<input type="checkbox"/>
3.6	Do you have a procedure to detect and report shortages and overages?	<input type="checkbox"/>	<input type="checkbox"/>
Container Security			
3.7	Are containers/trailers/railcars stored overnight?	<input type="checkbox"/>	<input type="checkbox"/>
	Are those containers loaded?	<input type="checkbox"/>	<input type="checkbox"/>
	How are the containers secured?		
3.8	Are all containers or trailers entering or leaving the facility recorded with the name of the driver?	<input type="checkbox"/>	<input type="checkbox"/>
3.9	Are containers stored in a monitored area to protect them from unauthorized access?	<input type="checkbox"/>	<input type="checkbox"/>
3.10	Do you utilize the 7 point inspection process to ensure the integrity of containers prior to loading?	<input type="checkbox"/>	<input type="checkbox"/>
3.11	Do you utilize high security seals on outbound containers/trailers/railcars?	<input type="checkbox"/>	<input type="checkbox"/>
3.12	Do you have a procedure for storing, recording, tracking, and affixing seals?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			

4. Personnel Security			
<i>NOTE: We recognize that many of the standards listed below are the common practice in the U.S., though this might not be the case in your country. We also recognize that some data or information that is available in the U.S. may not be available in other countries.</i>			
	Question	Yes	No
4.1	Are prospective employees pre-screened before employment?	<input type="checkbox"/>	<input type="checkbox"/>
4.2	Do you also pre-screen temporary and contract employees with the same diligence?	<input type="checkbox"/>	<input type="checkbox"/>
4.3	Which of the following areas does the pre-screening process include?		
	Application verification	<input type="checkbox"/>	<input type="checkbox"/>
	Prior employment	<input type="checkbox"/>	<input type="checkbox"/>
	Address verification	<input type="checkbox"/>	<input type="checkbox"/>
	Criminal convictions	<input type="checkbox"/>	<input type="checkbox"/>
	Drug testing	<input type="checkbox"/>	<input type="checkbox"/>
	Other (describe)	<input type="checkbox"/>	<input type="checkbox"/>

4.4	Are photographs of employees held on file?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			

5. Education & Training & Threat Awareness			
	Question	Yes	No
5.1	Does your facility have a formal training program?	<input type="checkbox"/>	<input type="checkbox"/>
5.2	What is the schedule for training program to employees?		
5.3	Does the training program address the following areas?		
	Recognizing internal conspiracies	<input type="checkbox"/>	<input type="checkbox"/>
	Maintaining product integrity	<input type="checkbox"/>	<input type="checkbox"/>
	Discovering and addressing unauthorized access of the facility or information	<input type="checkbox"/>	<input type="checkbox"/>
5.4	Is the training documented, with proof that an employee has completed the training maintained in the employee's file?	<input type="checkbox"/>	<input type="checkbox"/>
5.5	Do you offer incentives for employees to participate in security controls (e.g., rewards for reporting wrongdoing)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.6	Does training addresses potential threats in the supply chain?	<input type="checkbox"/>	<input type="checkbox"/>
5.7	Do employees routinely receive briefings or other communication illustrating smuggling trends, seizures and information on terrorist threats along routes or areas in the supply chain?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:			

Appendix D

Supplier Ethical Standard Corrective Action Report

