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CEO Message

I am pleased to present Newell Brands' first Corporate Social Responsibility Report, which includes highlights from 2019 and our continuous journey to achieve a more planet friendly world. While I am delighted to share these accomplishments, I also want to acknowledge that this report's publication comes during the COVID-19 global pandemic, and the devastating impacts and challenges it presents. As Newell Brands, like so many other companies, responds to this unprecedented situation, we have three key short-term priorities. First and foremost, is unequivocally the safety and wellbeing of our people. Second, we are taking the necessary steps to ensure the company's financial vitality and business continuity, including the protection of the profitability and cash flow of the enterprise. And finally, we are working diligently to keep our manufacturing facilities and distribution centers operating so we can provide products like food storage containers, cleaning and sanitization products and childcare products to our consumers who need them now more than ever.

The critical nature of these short-term priorities, however, does not detract from the important long-term work we are doing to ensure our company is a force for good in the world. Our work in sustainability and corporate social responsibility is critical for our employees, consumers, customers, communities and investors. We're continually striving to keep our workplaces safe, limit the environmental impact of our products and operations and foster an inclusive environment where everyone is empowered to contribute and make an impact.

This report illustrates that our people are the driving force of our success. We have teams of senior leaders across the organization devoted to effecting change and driving sustainability. But our sustainability efforts extend well beyond this dedicated group. Employees from all our locations globally are encouraged to become Sustainability Champions tasked with driving positive and sustainable change locally. We currently have over 100 Sustainability Champions across our operating businesses and we look forward to growing this number.

The environmental stewardship does not stop there. Our employees continuously evaluate the scale and materials necessary to produce great products and manage our energy usage. We have prioritized lowering the amount of waste that we send to landfills. Our sites have programs in place to reuse first, recycle second, and then only if necessary, send to a landfill. Water consumption is also important. Newell Brands appreciates the importance water has on the communities near our manufacturing facilities and we are working hard to increase water reuse and lower our water consumption. Overall, we have set sustainability goals against a 2016 baseline and have committed to achieve the following by 2025:

- Reduce our energy usage by 25%. Since 2016 we have lowered our energy usage by 7%;
- Reduce our greenhouse gas emissions by 30%. Our GHG emissions have been lowered by 11% to date;
- Ensure 90% of transporters are certified by the Environmental Protection Agency's SmartWay® Transport Partnership. Currently 80% of our partners are certified; and
- Reduce landfill disposal by recycling or reusing 90% of the waste we generate each year. In 2019 we diverted 72% of our waste from the landfill.

You will see many examples in this report of how our beloved brands support sustainable living and help our consumers reduce their environmental impact, including Contigo®, Bubba®, Rubbermaid Freshworks®, Sistema® and Rubbermaid Commercial Products®. An important part of reducing our environmental impact starts with the packaging of our products. We have set product packaging goals to remove difficult to recycle materials and increase sustainably sourced materials:

- By 2025, eliminate the use of Polyvinyl Chloride (PVC) and Expanded Polystyrene (EPS) in all product packaging; and
- By 2025, have 100% of our direct sourced paperbased product packaging supplied by certified, verified or recycled sources.

In additional to our sustainability initiatives, we have a range of Talent Development, Diversity & Inclusion, and Wellness & Safety programs designed to create an inclusive and engaged workforce. We strive to support a diverse and inclusive working environment that gives our people the opportunity to develop and succeed. Giving back to the communities where we live and work is important to us as a company and to our people. The Newell Brands Charitable Foundation is the cornerstone of our philanthropy efforts. I am very proud of the recent contributions our Business Units have made to healthcare facilities, shelters and other community organizations during the COVID-19 crisis. Among many product donations, our team has donated cleaning and sanitization products, gloves, masks, water bottles and food storage containers to hospitals and childcare products like car seats, highchairs, strollers and playards to families in need. Through volunteering, product donations, financial support and strategic initiatives and partnerships, we strive to make a difference in our communities while engaging our employees.

Our commitment to act responsibly extends to our suppliers and their people. We support them through training and engagement on responsible sourcing, respect for human rights and continuous improvement within our operations.

With that said, we must lead by example. Newell Brands' Board of Directors and Executive Leadership Team establish the long-term strategic direction of the company and the strong framework of principles and practices which ensure accountability, fairness and transparency in our relationships with all our stakeholders. Additionally, myself and the Executive Leadership Team and Board of Directors feel passionately about continuing to make diversity and inclusion a hallmark value of Newell Brands. We are committed to maintaining the highest level of ethics and integrity in our business dealings and have set up the appropriate structure to enable this commitment.

I am immensely proud of our progress while acknowledging we have a great deal of opportunity ahead to make positive change in the world. Thank you for joining us on this journey and we hope you enjoy reading about our achievements to date.

Onwards and upwards,



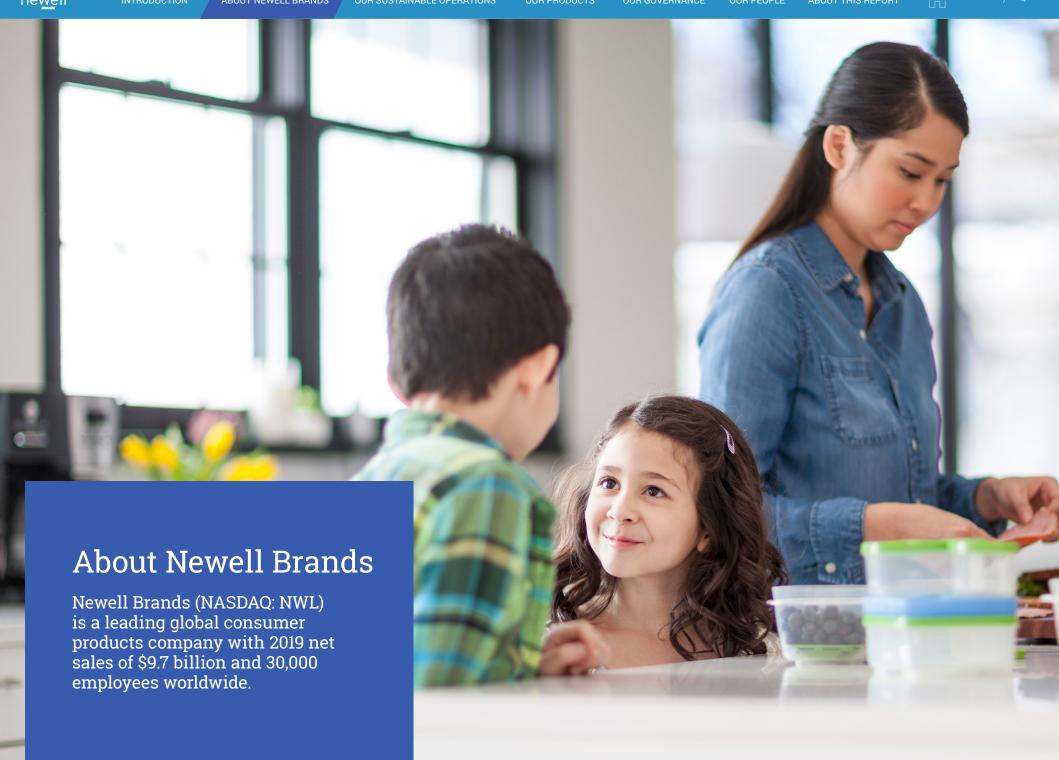
Ravi Saligram
President & CEO





ABOUT NEWELL BRANDS

OUR SUSTAINABLE OPERATIONS



Our products are found in more than 90 percent of U.S. households, with about 80 percent of our sales coming from brands that are #1 or #2 in their categories. Our top ten markets generate more than 90 percent of our total sales and are home to more than 1.1 billion consumers. We have 63 manufacturing and research facilities globally, across 20 countries. We utilize both internal and external manufacturing facilities and third-party partners to manufacture and source our products. Approximately 50 percent of products are made internally, and 50 percent are made externally. Our internal and external manufacturing facilities are in the U.S., China, Mexico, France and Germany, among other countries.

Our products are designed to simplify and improve consumers' everyday lives and help them do some good in the world. We're committed to sustainability at each step of the product life cycle and in the way, we operate in the workplace and our communities. We realize sustainability has no end point but is a journey of responsibility, transparency and accountability and we're proud stewards of brands that support a planet friendly lifestyle, including:



Reducing single-use plastics Contigo®, Bubba®, Rubbermaid®



Preserving food and/or reducing food waste

Ball®, FoodSaver®, Rubbermaid®, Rubbermaid Freshworks®, Sistema®



Collecting and diverting waste properly Rubbermaid Commercial Products®



Choosing sustainably-sourced products Marmot®



Our Brands



















































Sustainability Philosophy

Our Approach

The Director of Global Corporate Social Responsibility (CSR) oversees our global sustainability initiatives and chairs the CSR Council, our executive steering committee for sustainability-related issues. The Council meets monthly to discuss our strategic focus areas, our environmental programs, key updates and relevant regulatory trends. Our Sustainability Council is a more focused second oversight group, made up of functional leaders across our operating businesses, that coordinates environmental management efforts across the enterprise.



Our Focus Areas

Throughout the report, you will read about our different initiatives and programs. All ladder back up to our sustainable focus areas that chart our course on this ongoing journey.

Employee Engagement

Positive change begins from within and we realize it is our employees who have the passion necessary for our success. We encourage employees from all locations sites to become a Sustainability Champion. As a Sustainability Champion, we equip and empower them to drive positive and sustainable change at their facility locations.

Climate and Emissions

We set operational energy goals to increase our efficiency and lower our consumption at our manufacturing sites. We work with our supply partners to ensure we optimize fleet efficiency through the Environmental Protection Agency's SmartWay® Transport Partnership.

Waste Minimization and Diversion

Our operations produce minimal waste, but we acknowledge that we still have a responsibility to find ways to lower what we send to the landfill. Our sites have programs in place to reuse first, recycle second, and then if necessary, send to a landfill.

Circular Economy

Our packaging is the first step in increasing the circular economy of our products. We have set packaging goals to remove difficult to recycle materials and increase sustainably sourced materials.

Energy Management

Environmental stewardship begins with understanding the scale and materials necessary to produce great products and energy is one of our largest material impacts. We work actively with our sites to increase energy management, set reduction goals and implement energy saving projects.

Water Stewardship

Newell Brands respects the importance water has on the communities near our manufacturing sites. We work with our sites to increase water reuse and lower our water consumption.

Human Rights and Responsible Sourcing

Our suppliers and their employees are important to us and we want to ensure they maintain safe working conditions and operate in an ethical and transparent manner. Through training, assessments and engagement, we are focused on promoting supplier development and continuous improvement within our operations.

Sustainability Governance

Our sustainability journey requires support from our leadership teams. We have a CSR council with senior leadership involvement along with supporting councils such as the Sustainability Compliance Council.

Climate, Energy & Emissions

Our Approach

We use data management systems to track energy consumption, determine baselines and reduce overall energy usage and spend.

We respond to the Climate Disclosure Project (CDP) Climate Change questionnaire each year, which is an important vehicle for providing stakeholders with all the technical details of our energy and emissions performance as well as how we manage risks and opportunities.

Through our Sustainability Champions program and the Hierarchy of Sustainability, we encourage all operations to conduct energy awareness campaigns for employees, upgrade to high-efficiency lighting, conduct energy audits and explore renewable energy generation where feasible.

Hierarchy of Sustainability

In 2019, we launched a tiered structure of sustainability performance known as our Hierarchy of Sustainability. Our sites use the tool to assess their local sustainability progress—achieving either bronze, silver or gold rankings—and collaborate and share successes across the company.

Our focus areas for the program include:

- Energy and Greenhouse Gas **Emissions**;
- Waste and Recycling;
- · Water Consumption; and
- Employee Engagement.



CLIMATE AND ENERGY GOALS



Sustainability **Champions Spotlights**

Newell Brands' global Sustainability Champions program is led by a subcommittee of our Sustainability Council. We currently have 100+ sustainability champions across our operating businesses who are empowered to implement sustainability initiatives, engage employees and foster a culture of sustainability at their locations. Sustainability Champions join quarterly calls where they discuss best practices and hear from guest speakers who have successfully rolled out new or innovative practices in their workplaces.

Piyada Hankunakul from the Writing business in Bangkok, Thailand, helped the Paper **Mate Liquid Paper Correction** Pen receive a Green Label or Eco Label certification from the Thailand Environment Institute Foundation. The label indicates that both the product and packaging are recognized as less harmful to the environment and have met a set of requirements and quality tests.



Luis Salomon, a team member from the Outdoor & Recreation business in Pouso Alegre, Brazil, is driving awareness of the environmental impacts caused by improper disposal of oils. He hosted a local waste collection event where employees could bring in their stock of oils for proper disposal. More than 100 liters of oil were collected.

Luis Salomon

Alegre, Brazil

Piyada Hankunakul

Bangkok, Thailand

Tamara Devcich, from Sistema in Auckland, New Zealand, is part of the Sistema Green Team. The team reports greenhouse gas emissions and monitors the sustainability program. She has been working with the Sistema team on reusable shopping baskets made of the same recycled material for a New Zealand supermarket chain. They have been working with customers to help drive the message of "bring your own containers" as an alternative to single use plastic bags and single use drink bottles by ensuring Sistema products are placed in locations around the stores so shoppers can access them more easily.



is doing his part to combat food waste and recycling contamination. He led the charge to have separate food waste collection and new recycling bins added in the office. The office also offered training for employees on proper recycling techniques. The effort has been effective in driving awareness among employees.

Simon Croasdel

Simon Croasdell from the Home

Fragrance business in Avonmouth, UK,

Avonmouth, UK

Auckland, New Zealand

Tamara Devcich

(i)

SmartWay® Leading the Way

The Environmental Protection Agency's SmartWay® Transport Partnership encourages businesses to manage logistics in an environmentally responsible way. SmartWay is committed to ongoing efforts to align emissions accounting methodologies and tools, leading to greater awareness of the environmental impacts of freight and the best strategies to reduce impacts. Our partnership with SmartWay will continue to help us achieve emissions reductions and cost savings through strategies and technologies that will strengthen the efficiency of goods movement. Our goal is to have 90 percent of our carrier fleet SmartWay certified by 2025, and we are well on our way there, as more than 80 percent of our fleet is certified to date.



Newell Brands as Giga-Guru

Project Gigaton is a Walmart initiative to eliminate a billion metric tons—one gigaton—of GHG emissions cumulatively across its broad network of suppliers by 2030. Suppliers can commit to reductions in any of the initiative's six pillars: energy, agriculture, waste, packaging, deforestation and product use.

Newell Brands partners with Walmart on this important initiative, committing to reduce 30 percent of emissions based on a 2016 baseline. Our reduction goal makes us a "Giga-Guru" in Walmart's program. We are focusing on the energy and product use pillars and looking at projects pertaining to operations and supply chain, packaging and transport optimization. In 2019, we reduced approximately 44,653 metric tons of emissions compared to 2016, based on energy efficiency from our operations. With respect to our products, we are designing holistic sustainable products that save on waste and greenhouse gas emissions. For example, Rubbermaid FreshWorks[™] food storage containers help food last longer and reduce carbon emissions on the transportation and disposal phases of the product life cycle.

Data Verification

We commissioned a third-party review of our sustainability data collection systems and processes. It was their conclusion that our "energy and associated GHG data are reliable for corporate reporting purposes" and we feel very confident in the quality of our performance data in this area. We continue to work on strengthening our systems and will consider seeking verification of other metrics, such as water and waste data, in the coming years. See the Independent Third-Party Review and Verification Statement at the end of this report.



Energy & GHG Emissions	2016	2017	2018	2019	2025 Goal
Energy usage (MWh)	921,539	905,020	880,398	854,454	-
Percent energy reduction (2016 baseline)		-2%	-4%	-7%	-25%
Scope 1 & 2 GHG emissions (metric tons CO2e)	399,276	386,347	386,881	355,745	-
Percent GHG emissions reduction (2016 baseline)		-3%	-3%	-11%	-30%





Smart Energy Use

Yankee Candle implemented an LED lighting project at its storage facility located in South Deerfield, MA, upgrading the existing 175 (460W) Ceramic Metal Halide High Bay Fixtures with new energy efficient LED fixtures (240W) and lamps. Occupancy sensors were installed on 50 percent of new fixtures. This project serves as an excellent example of how sustainability can reduce costs and save money, reduce environmental impacts and support workplace safety.

Project Savings:



176 tons of CO2 in annual emissions



of annual



energy cost



for project





Sistema Plastics Ltd Achieves CEMARS® Certification

As one of the largest manufacturing facilities in New Zealand, Sistema recognizes it has a responsibility to operate in the most sustainable way possible, from the process of designing plastic containers through to manufacturing and distribution. Sistema is committed to reducing its carbon emissions by achieving Certified Emissions Measurement And Reduction Scheme (CEMARS®) certification.

CEMARS is a recognized greenhouse gas emissions measurement and reduction initiative administered by Enviro-Mark Solutions. This certification is the first of a two-step process towards achieving carboNZeroCert™ certification in New Zealand.

GHG Emissions Management Plan & 2021 Reduction Targets:



Reduce freight and shipping emissions by

15%



Reduce emissions from electricity use by

40%



Offset emissions from long haul travel by

40%



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Our Approach

At Newell Brands, we are creating a culture focused on eliminating waste across all businesses, and we aspire to achieve zero waste to landfill in all of our operations, whether in transport and distribution or in our manufacturing facilities and offices. From the early stages of product design to manufacturing waste disposal, we are striving to improve our waste footprint.

Our approach is consistent across our locations and utilizes the PEAK strategy—Planning, Engagement, Achievement and Knowledge. We focus on zero waste in all forms—including actual waste as well as wasted time and injuries—and our goal is complete reduction.

Various Newell Brands manufacturing facilities host Kaizen events. Kaizen is Japanese for "change for the good," and the events are aimed at eliminating or reducing operational waste. Several facilities have also conducted waste audits, begun composting and incorporated take-back programs where possible.

In our operations, we set a goal to minimize the amount of waste that we send to the landfills. Our 2025 goal is to recycle or reuse 90 percent of the waste we generate annually, diverting from our landfills.

In 2019, we achieved a cumulative 72 percent reduction in waste to landfill, mainly due to recycling and reuse efforts. Waste reduction leads to a direct economic benefit as well; just one of our facilities' waste reduction efforts enabled it to save more than \$60,000 annually through a reduction of disposal costs and trips to the landfill.

Manufacturing waste (metric tons)	2019
Total waste	29,264
Recycled material (refers to off-site recycled content)	21,211
Percent of waste diverted from landfill	72%

Life Cycle Thinking – Closed Loop Recycling Project

In 2019, the Quickie® plant in El Paso, TX, took decisive action to reduce landfill waste and avoid waste cross-contamination caused by the disposal of excess inventory of cotton mops. After reviewing the product's life cycle and waste disposal practices at the plant, the local team developed a recycling system to collect and properly dispose of Quickie® scrap elements. Now, Quickie® cotton mops are recycled and reused as carpet material. By physically separating defective mops and waste materials, the team also eliminated the risk of waste cross contamination.

As a result of this solution, the plant no longer needs an outside waste removal provider, leading to an annual savings of \$11,000. Another benefit is that we will eliminate two tons of greenhouse gases previously associated with transporting waste.

Sustainable Pallet Partnerships

Pallets are an important piece of Newell Brands' sourcing, storing and distribution processes—from how we receive material to manufacture our products to how we store material in our distribution centers and manufacturing facilities, to how we get our products to our customers. In North America alone, Newell Brands purchases close to seven million new and recycled wooden pallets and leases approximately 300,000 wooden rental pallets each year.

Rubbermaid Commercial Products in Winchester, VA, has partnered with a pallet company that recycles the wood scrap from old pallets into landscaping mulch. Rental pallets are built from responsibly forested timber, and if damaged, can be repaired repeatedly and remain usable for up to 10 years with proper maintenance. Once the rental pallets are "retired," they are dissembled and recycled as opposed to landfilled. In direct contrast, most plastic pallets are manufactured in one piece, meaning if one part of the plastic pallet is damaged, the construction of the pallet prevents it from being repaired and the entire pallet must be replaced, making the wooden pallet a more economical and sustainable product.

ABOUT NEWELL BRANDS

Water & Land

We understand that our operational footprint can have an impact on our natural resources, and we work to reduce these impacts by reducing our water use, monitoring waterways and land and remediating when necessary.

Although Newell Brands is not a large consumer of water within our operations, we understand that it is a valuable commodity. We encourage our offices and facilities to pursue water conservation measures where feasible.

In 2019, our global water consumption was 855.371 million gallons, which is a 37 percent reduction from 2016.

Newell Brands is also responsible for costs of environmental remediation at certain sites, either contractually or legally. As of December 31, 2019, our estimate of environmental remediation costs outstanding was \$45 million.

To monitor and reduce our potential impacts on water and land surrounding our facilities, we have management systems and corporate standards in place to promote compliance with all applicable environmental regulations and to ensure that each facility is held to the same high standards, regardless of location. If an environmental event such as a spill occurs, we work with first responders and local and federal agencies, as appropriate, to contain any potential hazards and minimize (or remediate, if necessary) any impacts. Our robust response planning processes are designed to protect people and natural resources both inside and outside our fence line and help ensure business continuity in the event of an emergency.



Outdoor & Recreation Water Reclamation Project

Our Outdoor & Recreation manufacturing facility in New Braunfels, TX, uses air conditioner spot cooling units that generate condensate water that is normally directed into water drains as clean waste water. A system was developed to capture the condensate and pump it to a collection tank outside of the facility that, when full, pumps the water into one of the factory water tower reservoirs. This allows the water to be recycled and used to cool plant manufacturing processes.

This project has a direct and positive impact on the local environment: every gallon that is reclaimed and reused is one gallon of water that is not required from our local aquifer. The estimated reclaimed and reused water is 133,127 gallons a year. This number will increase as we continue to install spot air conditioner units to cool the workplace environments.



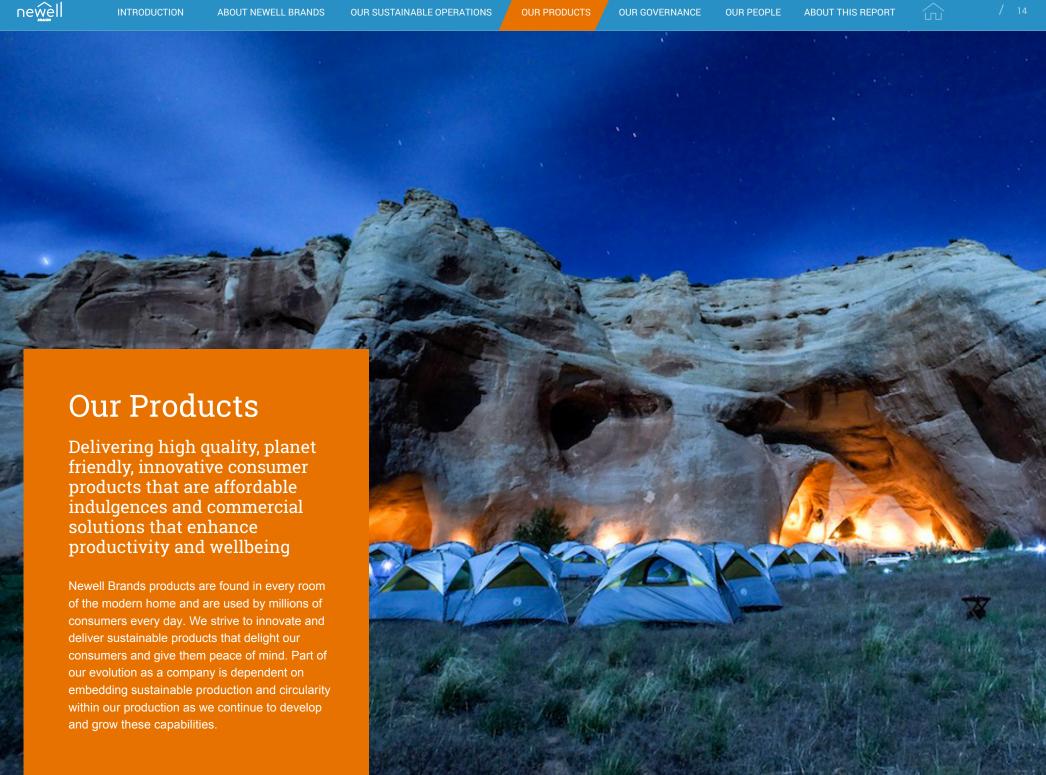
Closed Loop Chiller in NUK®'s Manufacturing Facility

In 2019, we installed a closed loop chiller system with an adiabatic free cooler in our Reedsburg, WI, facility, with the two following benefits: reduced water and electrical consumption. Projected savings for this project is \$22,000 per year against a \$40,000 annual spend, resulting in more than 50 percent cost savings. Prior to the installation of the closed loop system, the facility consumed and then discharged approximately 2.6M gallons of non-contact city water per month. Since implementation, we are discharging approximately 100,000 gallons per month, for 30 million gallons of water conservation annually. In addition, prior to the install, each individual press had its own chiller system. We have eliminated seven individual chillers from our operation, saving both on maintenance costs and electrical usage cost. Lastly, as the water can be chilled by cooler ambient outside temperatures, we have seen a monthly reduction of 25,000 watts of electricity during the cooler months, which is equal to 99 percent of the electrical usage reduction for this operation.

Project Savings:







OUR PEOPLE

Innovation & Sustainability

Our Approach

Many of our products support sustainable living and help our consumers reduce their environmental impact. In their own unique ways, our brand teams are focused on improving the sustainability of the products they make-from design and sourcing through manufacturing, packaging, distribution and disposal.





OUR GOVERNANCE

Sustainable Products & the Circular Economy

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Our latest design frontier is our product platform focused on rethinking design beyond the use of a product, including sustainability and environmental impacts across a product's entire life cycle. Integrating the circular economy across the industry will shift manufacturing from a linear system to one that is circular by design and incorporates the following principles:

- **Design out waste and pollution**
- Keep products and materials in use
- Regenerate natural systems



We know the choices made at each step of the product life cycle have an impact on the environment, and we look to develop and integrate sustainability considerations wherever possible:

- We're focusing on sustainable innovation early in the design process for both our products and packaging, leveraging the appropriate design criteria that will apply through the entire product life cycle, without losing focus on key consumer needs;
- We're increasing our use of greener and recycled materials and exploring alternatives to plastics across our product divisions; and
- We're building product platforms focused on reusability, durability and recyclability.

Integration of circular economy principles across our diverse brands and products is a challenging, entrepreneurial task that requires focus, collaboration and innovation globally. To begin reducing the environmental impacts of the products in our portfolio, we must first assess the current impacts across a product life cycle. We do this by implementing the Life Cycle Assessment (LCA) framework, a process for evaluating the environmental impact associated with all stages of a product's life. Our methodical LCA framework calculates the environmental impact of input materials and of the manufacturing, packaging, distribution and use of product, as well as its disposal at end of life.

A number of product lines within Newell Brands' Commercial and Writing businesses have switched to post-consumer and post-industrial recycled resin as a sustainable alternative to virgin plastic. Recycled resin is used with about 30 percent of Commercial products such as material carts, dollies, wastebaskets and refuse containers. Writing uses recycled resin in Prismacolor®, Sharpie® King Caps and Elmer's[®] foam boards products. With new technology being developed, such as chemical recycling, there will be new opportunities to add recycled material to our other operating businesses.

In Outdoor & Recreation, Marmot® exemplifies our approach to making sustainable products. Marmot® has been producing high-quality technical clothing and equipment for mountaineers, outdoor enthusiasts and extreme alpinists since 1974. Based in Rohnert Park, CA, the Marmot® team has been advancing sustainability through product innovations and process changes since 2007. Marmot[®] introduced Bluesign approved fabrics, eliminated Perfluorooctanoic acid (PFOA) from products, became Responsible Down Standard (RDS) and certified and introduced Treadlightupcycled product lines for sleeping bags and waterproof rainwear. New this year, Marmot® is introducing an Environmental Impact Report Card hangtag for a number of our product lines to further inform consumers about Marmot®'s sustainability efforts.

Sustainable Living



Sustainable Apparel Technologies Eco Featherless Products

Sustainability continues to play an important role in the outdoor industry with Marmot[®]. Outdoor equipment consumers are interested in purchasing products that use few pollutants, have a resourceefficient manufacturer and use natural materials. With the two following approaches, Marmot combines functionality and ecoconsciousness to meet and exceed our consumers' expectations. The Marmot® EVODry products are completely free of perfluorinated chemicals and made from upcycled yarn. Compared to new yarns, EVODry fabrics uses less petroleum and energy. Additionally, our waterproofing treatment doesn't use any water whatsoever and minimizes waste. Featherless is a highperformance insulation produced using recycled plastic as an alternative to natural down sourced from geese and ducks.

FoodSaver® Vacuum Sealing System Helps **Households Reduce Food Waste and Save Money**

Research shows that Americans throw away nearly \$165 billion worth of food each year, costing the average American family up to \$2,2001. The FoodSaver® system is the #1 Vacuum Sealing System and leading brand in food preservation, with a Food Preservation System that creates an air-tight seal to lock in freshness, protect food from spoiling and reduce waste. This system keeps food fresh up to 5 times longer², whether in the pantry, fridge or freezer, and can save users up to \$2,700 a year3.



Beyond the sustainability benefits, FoodSaver® is working to minimize material waste in manufacturing, explore reusability for bags and rolls, utilize recycled material and packaging where possible and reduce carbon emissions during transportation.

- 1 Natural Resources Defense Council (NRDC), http://www.nrdc.org/food/files/wasted-food-ip.pdf
- 2 Compared to ordinary storage methods
- 3 Based on buying in bulk, buying on sale and preventing waste

Marmot®'s Environmental Impact Report Cards

To continue transparent communication of sustainability efforts to consumers, Marmot recently created an Environmental Impact Report Card for its outerwear and sleeping bags. Illustrated on a hangtag, these report cards rank products on a good-better-best scale based on the environmental and social impact of each individual product. To explain why each product received the score it did, hangtags display an icon for each criteria—bluesign certified material recycled content, and PFC-Free Durable Water Repellent. When met, green text explains specifics (as seen on the left on 'Best' hangtag). When not met, grey text (below) explains that Marmot is a performance-driven brand and sustainable alternatives will be used when they don't compromise performance.







Rubbermaid Commercial Products Mobile Marketing Showrooms

The Rubbermaid Commercial Products® (RCP) team has four mobile marketing selling showrooms that travel across the U.S. to various customer facilities, distributor locations and trade events. One of the showrooms is dedicated specifically to highlighting sustainable solutions, while the other three display a variety of products that also support sustainability. All four trucks include products that contain recycled content that contribute to water conservation, help reduce landfill waste and encourage recycling and compositing habits. During these visits, our team works with end users to analyze their waste streams, identify key areas for improvement and offer RCP product recommendations that will enable them to practice better habits. The Mobile Marketing team has made more than 350 customer visits including 50 site assessments and waste audits.

Sustainable Packaging

Our Approach

In 2019, Newell Brands joined the <u>Sustainable Packaging Coalition</u>®. We will align with their mission of sourcing responsibly and optimizing and recovering packaging resources to have a low impact where possible. We have set corporate-wide packaging goals to remove difficult to recycle materials and increase sustainable sourced materials.



Eliminate the use of Polyvinyl Chloride (PVC) and Expanded Polystyrene (EPS) in all packaging by 2025



100% of our direct sourced paper-based packaging will be supplied by certified, verified or recycled sources by 2025

Our approach for success utilizes the five principles below to continuously lower the environmental impact of our packaging.

- $1 \qquad \begin{array}{ll} \text{Reduce environmental impacts throughout the entire life cycle} \\ \text{(e.g. carbon footprint)} \end{array}$
- 2. Optimize material use and eliminate unnecessary components
- 3 Use materials that are widely recycled and design packaging to be recovered
- 4 Increase use of recycled and sustainably sourced materials
- 5 Provide clear recycling instructions

MATERIAL OPTIMIZATION



Left: The packaging for the Contigo® thermal product line was redesigned from a containing structure to a simple paper sleeve. By making this change, Contigo reduced paper usage by 88 percent.

Right: Rubbermaid® FreshWorks™ containers went from a corrugate box with a window to a stacked product version with only a Solid Bleached Sulfate sleeve. This reduced material volume by 92 percent.



SUSTAINABLE MATERIALS



Left: Woodwick® has been transitioning from Expanded Polystyrene (EPS) foam and foamin-place (FIP) to molded pulp. Molded pulp is a packaging material made from recycled paperboard and/or newsprint. Moving to molded pulp enables the packaging to be recyclable whereas EPS and the foam often end up in a landfill.

Right: The packaging for Mr Sketch® products went from clear fold PET plastic to paperboard. Plastic film is typically recyclable only once at certain drop-off locations, while paper is recyclable multiple times and widely accepted in curbside recycling—increasing the likelihood that the material will be recycled.



Industry Partnership with How2Recycle®

To provide clear recycling instructions and ensure our packaging is recycled properly, we partnered with How2Recycle®.

In 2019, our Connected Home & Security business participated in a pilot program using How2Recycle® labels. We plan to have How2Recyle® labels integrated into packaging on all brands by 2025.

Three category labels in packaging recyclability



Optimally recyclable

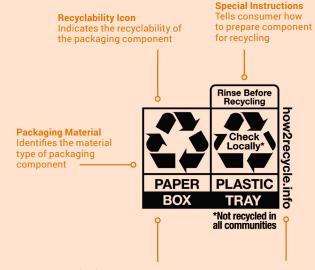


Recyclable in some communities



Partially or not vet recyclable

HOW2RECYCLE® LABEL OVERVIEW



Packaging Component The specific part of the package referenced by the label

How2Recycle Website Provides information on the label and additional recycling information





Minimizing Packaging

Working off the Life Cycle Analysis framework, the teams in our Connected Home & Security business developed a new packaging concept for First Alert. The new packaging was created from recycled materials, reducing the amount of plastic used and enabling consumers to recycle it. Packaging made from recycled materials has the added benefit of being more secure and tearresistant compared to the traditional plastic clamshell packaging used by First Alert prior to the refresh.

Impact:



60% less plastic on average



36% reduction in overall package weight



An optimized design that's cube shaped and retail ready for more efficient restocking

An Innovative Mindset

Our Design team, led by the Senior Vice President of Design and the Director of Innovation, works with every Business Unit to incorporate our Principles of Design at the very early stages of the manufacturing process.

1	INNOVATIVE CLARITY	The "new" is quickly self-evident
2	SMART SIMPLICITY	Visually clean, but not plain
3	INTUITIVE USABILITY	Consumer interaction that is clear, easy and safe
4	FUNCTIONAL INTEGRITY	Robust operation and quality experience
5	AESTHETIC HARMONY	Shape, line, proportion and scale that work together
6	EMOTIONAL DESIRABILITY	Makes the consumer want it
7	BRAND SENSITIVITY	Amplifying the overarching tenets and spirit of the brand
8	VALUE RESPONSIBILITY	Contributes to portfolio business goals



To coalesce ideas and product innovation, leaders in Marketing, Design, R&D, Innovation Group, Finance and the CEOs of each Business Unit hold monthly innovation meetings to discuss new products with product managers. The team creates process roadmaps to bring a product from ideation through business case, design, funding, production, testing (including consumer insights), scaling and launch to market.



Design Institute



design institute

Through the company's state-of-the art Green Certified Design Institute, our designers receive multi-disciplinary training and professional development opportunities to support their personal growth and contribute to Newell's innovative platform. The curriculum includes three programs, each solidly rooted in the Newell Brands Design culture and values;



Mastery of skills, intellectual understanding, knowledge and intuition;



Character

Motivation, passion, attitude, ethics and values; and



Process

Discipline, creativity, ability to collaborate, methodology and teach-ability.

Culture of Product Safety

Newell Brands' number one priority is the safety and wellbeing of our consumers, customers and employees. With a strong track record of product safety, we proactively evaluate our products for safety and compliance with applicable safety regulations in every jurisdiction where we operate and sell. In fact, many of our Business Units set internal standards that go above and beyond regulations.

Accountability for product safety sits with our Business Units, who update our Executive Leadership Team regarding any potential issues and corrective action items. For example, Graco®, utilizes a Business Unitspecific Safety Committee. The committee participates in the product development processes which includes, safety testing and our Design Failure Mode and Effect Analysis (DFMEA) for each product.

The DFMEA is a methodical approach used to identify potential risks and failures introduced in a new or changed design of a product. Our Design Team initially identifies design functions, failure modes and their effects on the consumer with corresponding severity ranking of any hazards identified. They then systematically identify mitigation actions to prevent occurrence of each failure mode—from normal use or reasonably foreseeable misuse of the product and including quality, safety and consumer satisfaction issues.

While we intend to prevent potential safety issues from occurring, we understand that there are unforeseable external or internal issues that do happen. When this happens, we work with our consumers and customers to understand any safetyrelated concerns, and correct course. Our Consumer Care team is trained to handle safety complaints and concerns and escalate them appropriately to the crossfunctional Crisis Management Team (CMT). Our CMT is made up of leaders from Quality, R&D, Legal, Finance and Marketing, who examine all issues and determine actions, investigations and recalls.

In 2019, we conducted a voluntary recall in partnership with the U.S. Consumer Product Safety Commission (CPSC) of Contigo® Kids Cleanable Water Bottles. As part of our ongoing safety review process, Contigo identified that the water bottle's clear silicone spout in some cases may detach from the lid of the water bottle. The incident rate of consumers reporting the separation of the silicone spout was very low and no injuries were reported. But, out of an abundance of caution, we quickly self-reported the issue to the CPSC and launched a recall to remove the defective water bottle lids out of the market and give consumers a new product.

Restricted Substances

Newell Brands works to ensure that our products are compliant with all applicable substance restrictions in the markets in which they are sold. Substance restrictions are tailored to brands or product categories and may be based upon various published chemical lists from federal, state and local regulatory bodies, as well as industry associations. Graco for instance, targets substances for evaluation that are subject to particular regulatory focus in children's products, such as specific halogenated flame retardants, heavy metals, PFOA, ortho-phthalates, specific phosphorus-based flame retardants and nonylphenol. In all cases, substance regulations and guidance are rigorously monitored, and restrictions updated accordingly.

Above and Beyond Compliance: Car Seat Testing



We test our Graco® car seats based on criteria outlined in Federal Motor Vehicle Safety Standard 213 (FVMSS 213), which is the National Highway Transportation Safety Administration (NHTSA) standard for crash performance of car seats. In addition to FVMSS 213 requirements, Graco ®offers a line of car seats under the name ProtectPlus Engineered that tests front, side, rear, rollover crashes and

extreme car temperatures, which are tests not required by the government. Graco® car seats are tested for structural integrity by testing the acceleration speed and crash forces above federal standards.

Graco® also offers Safety Surround Advanced Side impact protection that provides additional protection in the headrest. More information on car seat testing can be found at https://www.gracobaby.com/en-US/safety.

Responsible Sourcing

Our Approach

Responsible sourcing is a multifaceted program that sits within Newell Brands' Procurement team, with direct oversight by the Chief Procurement Officer, the Chief Supply Chain Officer, Vice President Sourced Finished Goods & CSR and the Director of Global CSR. Social compliance is a large aspect of our overall approach to responsible sourcing.

Our program ensures that our suppliers operate with the highest standards of business ethics and in accordance with all applicable laws and regulations. Our program has five objectives, outlined below, against which we measure progress in a compliance software system. Launched in 2018, the software tracks all actions and results related to social and environmental compliance and responsible sourcing across our locations globally.

TARGETS:



Achieve 80% Corrective Action Plan closure rate annually



Quarterly training webinars for suppliers annually



Conduct two in-person Supplier Training events annually



Average more than 600 compliance audits annually

Social Compliance Program Objectives

- Minimize supply chain interruptions and risks
- Improve transparency within our supply chain
- Develop the social compliance capabilities of suppliers
- Protect our corporate reputation
- Ultimately enhance customer and consumer satisfaction



Policies & Expectations

We strive to help our suppliers develop and position them for success, and to improve transparency throughout our supply chain. Newell Brands' Responsible Sourcing Manual provides a comprehensive overview of our supplier requirements, as well as guidance to help suppliers implement programs to raise or maintain their factory standards.

We require strict adherence to our Vendor Code of Conduct (Code) which outlines our expectations of suppliers and vendors. For example, as part of our third party supplier audits, we conduct human rights due diligence risk assessments.

Along with governments, non-governmental organizations, the investment community and other companies, we are concerned with potential human rights violations, such as forced labor, human trafficking, child labor and the role armed conflicts may play in such violations across the Democratic Republic of Congo (DRC) and surrounding regions

("the DRC region"). In line with our Code provisions, we commit to conducting business in accordance with our deep respect for human rights. This means working to eliminate potential human rights violations within our supply chain, such as forced labor, human trafficking, child labor and the role armed conflicts may play in such violations across the DRC and surrounding regions. We strive to understand whether any "conflict minerals" which refers to tin, tungsten, tantalum and gold ("3TG minerals") that may be contained in our products are used to finance the conflict in the DRC region.

Our actions on conflict minerals support and demonstrate our long-term commitment to respect the human rights of all people and to improve the quality of life in the communities we serve. We publish the results in an annual Conflict Minerals Report.

Vendor Code of Conduct

	Working Hours	ورکی	Dormitory Standards
	Child Labor	⇔	Health & Safety
200	Forced Labor & Anti-Slavery		Environmental Protection
	Anti-Bribery		Sub-Contracting
8-0	Discrimination Harassment & Disciplinary Practices		Freedom of Association
	Wages & Benefits		Conflict Materials



OUR GOVERNANCE

New Supplier Qualification & Audits

The selection process for our suppliers integrates social and environmental compliance standards with the supplier prequalification and approval process to further drive performance and minimize risk to our organization. Detailed steps of this process are available in our Responsible Sourcing Manual.

In June of 2019, our Procurement team launched an enterprise-wide New Supplier Qualification procedure for our Sourced Finished Goods (SFG) category-third parties that provide finished products for resale under our brands. Before doing business with us, new SFG suppliers must meet four main criteria.

Should a supplier not pass an audit, they must complete a corrective action plan. Our goal is to have an 80 percent or better corrective action plan closure rate annually.

Below is an illustrated overview of our process. We have an escalation process in place to immediately rectify any high-risk issues and drive long-term continuous improvement with suppliers. Details on our audit scoring criteria and corrective action plan guidelines can be found in our Responsible Sourcing Manual.

Another form of auditing is conducted in compliance with the U.S. Customs-Trade Partnership Against Terrorism (C-TPAT). As a C-TPAT member, we conduct security audits on our suppliers and our own facilities to protect our value chain from potential terrorist threats and from concealment of terrorist weapons at each point in the international-based logistical supply chain.

- Supplier Technical / Capability Verification
- Social Compliance / Vendor Code of **Conduct Confirmation**
- Financial Health and Stability
- Supplier Business License and Tax Registration Certificate verification

Suppliers must pass a Newell Brands audit with more than 200 criteria before being approved as an active supplier. Our goal is to audit 100 percent of such suppliers on a three-year rolling basis, and to conduct more than 600 audits each year. In 2019, we conducted close to 700 audits. Our audit topics tie back to the criteria outlined within our Vendor Code of Conduct.



Training & Education

Supplier Training

We offer annual supplier training focused on continuous improvement, sharing best practices, developing our suppliers and helping them align with laws and our own requirements and celebrating achievements.

Some of the topics covered in the 2019 training included establishing effective management systems, building a proactive culture around fire safety, environmental protection and integrating sustainability within factories to go beyond compliance.

Beyond our annual training events, we offer frequent webinars, e-learning modules, round tables and on-site training for suppliers. We target completion of at least two training events a year and quarterly webinars.

In 2020, we will be working with a sampling of our suppliers to deploy sustainability projects to help them reduce their environmental footprint and track key suppliers' energy and emissions data.





Annual Supplier Training Events



Quarterly Webinars



E-Learning Modules

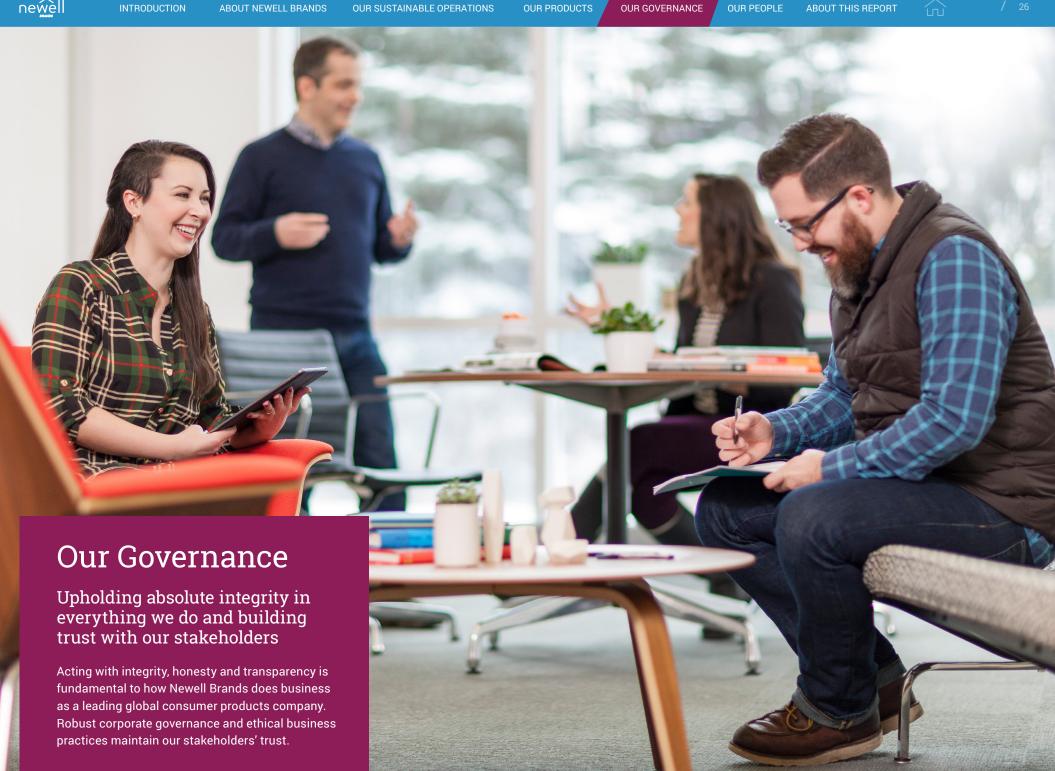


Supplier Roundtables



Onsite Factory Training





Corporate Governance

Our Approach

Newell Brands' Board of Directors and Executive Leadership Team establish the long-term strategic direction of the company to ensure that we are creating value for our stakeholders.

The Executive Leadership Team, led by our President and CEO, brings a wealth of experience to our day-today operations. This team is focused on putting our consumers first, collaborating with our customers, delivering value for our shareholders and galvanizing employees to create a winning culture.

Leading with integrity and ensuring the company's ongoing compliance in all areas of business are of paramount importance at Newell Brands. Our experienced Board of Directors performs several functions for the company, such as selecting company leaders, providing oversight of management practices and risk management and engaging with stakeholders.

We recognize the importance of Board member independence and diversity as critical components of objective oversight and continuous improvement. Of our 12 Board members, 11 are independent, with the exception of our President & CEO.

Director Composition	As of 1/1/20
Number of Directors	12
Percent Director Independence	92%
Percent Women on Board	25%
Percent Minority on Board	25%
Percent Under 30 Years Old	0%
Percent 30 – 50 Years Old	25%
Percent Over 50 Years Old	75%
Average Director Tenure	4 years

In step with fostering proper business behaviors through sound governance, the Board of Directors exercises oversight of certain environmental, social and governance (ESG) topic areas through the work of Board Committees.

- The Nominating/Governance Committee oversees environmental and health and safety , ethics and compliance policy and practices, sustainability and corporate citizenship
- · The Audit Committee holds responsibility for ensuring the ethics and integrity of financial statements, compliance and audits, and oversees any potential material ESG issues that may surface throughout the course of enterprise risk assessments
- The Organizational Development & **Compensation Committee** reviews executive compensation and pay-for-performance, as well as policies and procedures relating to succession planning of critical roles and human capital management and development
- The Finance Committee has oversight for the capital structure, financial plans, policies, practices and performance of the company.

For further details on specific Committee duties, visit the committee charters hyperlinked above.

To ensure the highest level of Board effectiveness, the Nominating/Governance Committee supervises an annual evaluation of the Board and its Committees in terms of oversight, strategy and management capabilities, structure, responsibilities and resources. The process includes an individual director evaluation for directors to receive peer feedback.



To help management and the Board understand and consider the issues that matter most to our stockholders, we conduct periodic outreach with a diverse array of stockholders on a range of topics related to executive compensation, governance and sustainability matters.

In 2019, we conducted outreach in the spring and fall with our top institutional investors representing approximately 48 and 43 percent, respectively, of our shares outstanding. Our outreach to investors was focused on executive compensation and corporate governance matters.

Additional details regarding Newell's corporate governance policies and disclosures can be found in our most recent Proxy Statement and on our Investor Relations website.

Ethics & Compliance

Our Approach

At Newell Brands, we are committed to upholding the highest ethical and legal compliance standards. We strongly believe that our success hinges on our ability to gain and maintain the trust of customers, consumers, business partners, employees and other stakeholders.

Our Chief Ethics & Compliance Officer oversees our Global Ethics & Compliance program, reports to the Chief Legal & Administrative Officer and provides regular updates to committees of the Board of Directors.

Policies

We maintain a number of policies that guide our employees and suppliers to act ethically and in compliance with laws and regulations. Our Code of Conduct guides our Board of Directors, executive officers and all global employees, while our Vendor Code of Conduct guides Newell Brands' business partners. Reviewed annually and updated as needed, these codes reinforce our values and define the behaviors necessary to preserving the ethical integrity of our company. To ensure compliance with applicable trade laws. Newell Brands maintains an International Export Compliance Policy that addresses trade sanctions, export controls, and anti-boycott regulations. The policy provides practical guidance for employees involved in international transactions. For example, it reminds employees that before sending products or engaging in other international transactions, we must confirm that these transactions do not involved an embargoed country.

Newell Brands conducts watchlist screening on third parties before they are set-up for payment in the company's SAP system. We review any potential hits to determine whether there are anti-bribery/anti-corruption risks associated with conducting business with these third parties. There is additional screening for a broader set of business partners once they are included in the company's payment system. Furthermore, we recently updated our Global Anti-Bribery and Anti-Corruption Policy for distribution.

Human Rights

Our respect for human rights and our standards and due diligence is a focal point of our Code of Conduct and Vendor Code of Conduct. Both include requirements for the following elements:

- Wages and benefits;
- · Child labor;
- Working hours;
- Forced or indentured labor and human trafficking;
- Discrimination, harassment and disciplinary practices; and
- Freedom of association.

Ethics Hotline And Training

The Board of Directors, senior leaders and employees are responsible for acting with integrity and speaking up about potential ethics and compliance issues. Newell Brands maintains a 24/7 Ethics Hotline, managed by a third party, for employees and third parties to ask questions, raise concerns or report potential Code violations. We encourage employees to report any concerns and remind them about the hotline through various means including the Code of Conduct training, our internal and external company websites and facility signage. Employees may also go directly to the Audit Committee of the Board of Directors to report concerns about accounting, financial controls or related topics.

Code of Conduct training, mandatory for all employees, covers topics such as cultivating a respectful workplace, conducting business in an ethical and legal manner, safeguarding employee and consumer privacy and reporting issues. The training includes a variety of employee touchpoints, including in-depth and refresher courses as well as microlearning opportunities that highlight a rotation of relevant topics. We review hotline reports to ensure that Code of Conduct training topics address areas where compliance may be a concern. Our goal is for 100 percent of employees to complete the online Code of Conduct training each year and in 2019, 99.7 percent of employees completed training. We also conduct global trainings in specific regions and countries on issues relevant to those geographies.

Employees without access to online training, such as some of those in our manufacturing facilities, receive in-person Code of Conduct training. Our facilities host several sessions per year and track attendance. Our Board of Directors also receive Code of Conduct training and anti-corruption training. Certain employees, depending on their role, may be required to complete additional ethics and compliance trainings. For instance, those employees involved in international transactions are required to take our Trade Control Policy training to ensure they understand relevant policies and procedures.





Talent Development

Our Approach

Newell Brands' Chief Human Resources Officer oversees our People strategies globally. Newell Brands' cultural identity today is rooted in being recognized as a highly effective company that delivers on commitments, fulfills promises and never disappoints. We encourage crossfunctional team collaboration that gives employees the opportunity to be nimble and purpose and performance driven.

grow@newell

grow@newell is our global platform for measuring and developing talent performance across Newell Brands. At the year-end performance review, managers and employees take time to reflect on accomplishments and highlight areas of opportunity, including goals for the upcoming year. Guidance appropriate to each career level provides employees with a framework and tools to support their personal and professional growth.

Engagement

Employee feedback is essential to an open, inclusive culture. It provides an important perspective on the operations and performance of our company and how leadership is engaging with diverse populations of people.

In 2018, we conducted a global engagement survey and a pulse survey ten months later. We also regularly gather feedback from employees in response to company events and initiatives.

In addition to local town halls and roundtable discussions, our President & CEO hosts quarterly Global Meetings in different locations around the company and our Chief Financial Officer hosts an employee-facing "Earnings Explained" call following our earnings announcements to explain our financial results. We also regularly publish a podcast called "Leaders Live", an informal conversation on a topical issue with a leader at the company.

now@newell

Launched in fall of 2017, now@newell is our employee mobile app. In 2019, nearly 9,000 employees used the app, which accounted for 95 percent of the professional population of the company. Content includes business updates, employee profiles, leadership videos, photo contests and information about our sustainability and volunteer efforts.



Newell Brands Meetups

Newell Meetups are leader-led, small-group roundtables that

2019 DATA









SURVEY RESULTS

73%

76%

99%

Wellness & Safety

We are committed to supporting employees' wellbeing and provide programs to promote wellness and safety at all levels of the organization.

Our Approach

newell

The health, safety and wellbeing of our employees is our number one priority. Accordingly, we are unwavering in our commitment to workplace safety and our vision of ZERO: zero injuries, zero unsafe conditions and zero unsafe behaviors.

We also offer benefits and programs that help our employees stay healthy, enjoy life and prepare for the future, from growing a family to saving for retirement. Overseen by our Vice President of Human Resources and Total Rewards, well@newell is a comprehensive benefits program offered to all employees.

Safety Management System

Our Safety Management System, named SEAL (Safety Excellence and Leadership), focuses on awareness, education, and a consistent set of safety processes and policies across the company. It is proactive and helps build a culture of safety to reduce and eliminate injuries, illnesses and incident-related costs. It also assures that we maintain compliance with governmental regulations. SEAL is driven from our executives to each location and individual where we establish consistent safety expectations. Our safety performance and programs are overseen by the Supply Chain department.

We focus on eliminating unsafe conditions and unsafe behaviors to achieve zero incidents. While our goal is always zero incidents, we set both leading and lagging indicator targets at all levels to drive safety performance. Our internal audit program is essential to monitoring our safety program and performance against our goals. We review the SEAL program annually to embed new best practices, ensure it is effective and to incorporate relevant updates in regulations and trends.

Five Elements of SEAL



Incident Management responding to injuries and illnesses



Safety Culture our vision, goals and employee engagement



Proactive Safety Processesprocedures, training and preventive strategies



Compliance ensuring regulatory compliance



General Implementation and Housekeeping



Safety Training

newell

All employees at our manufacturing and warehouse facilities receive regular safetytopic training. Each year, our locations perform a needs assessment to identify the environmental health and safety training needs and objectives for associates, supervisors and management, based on their function.

When joining the company, new manufacturing facility and warehouse employees go through a detailed safety orientation checklist, so they are properly trained in all safety aspects of their job. Items on the checklist must be reviewed and verified annually.

We track safety training per employee and evaluate the effectiveness of training during SEAL assessment. In 2019, our manufacturing employees completed 360,000 safety training hours globally.

Safety Performance

OUR SUSTAINABLE OPERATIONS

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Safety Performance Metrics	2017	2018	2019
Recordable injuries	589	517	336
Global recordable incident rate	1.09	1.41	0.99



TRODUCTION

well@newell

We want our employees to feel fulfilled at work and in their personal lives. Newell Brands is committed to supporting our employees' wellbeing with benefits that provide them and their families with comprehensive coverage and support through all stages of life.

We offer a company-paid global Employee Assistance Program to help all global employees and their family members deal with life's challenges, including stress, anxiety and depression, marital/family issues, substance abuse, child and elder care solutions and legal or financial issues.

Additionally, to encourage preventative screenings and healthy behaviors, U.S. employees are eligible for discounts on medical insurance premiums in exchange for getting an annual physical and being tobacco-free. Our telemedicine program makes care accessible to employees 24/7, wherever they may be.

Finally, NewellFlex is a discretionary program that enables employees and managers to develop an arrangement together that supports employees' lives outside of work, while meeting the business needs of the company. While options may vary based on the employee's role or location, the program offers several potential arrangements tailored to the individual employee's circumstances.

For more information, see our benefits page.



CEO Award for Zero Recordable Injuries

To highlight the tremendous safety accomplishments across our brands, our President & Chief Executive Officer gives an annual award to facilities which maintain high SEAL scores and operate with zero recordable injuries. In 2019, the Writing Business Unit's Maryville, TN, Shelbyville, TN and Manchester, TN facilities operated with zero recordable incidents.

These facilities all successfully implemented our SEAL program, and the results illustrate the success of the program and our employees' commitment to safe operations. In each facility, leadership encourages employees to keep safety top of mind through safety committees and safety recognition and incentive programs.

Graco and Baby Jogger Certified Passenger Safety Technician Inspections for Employees

Graco and Baby Jogger want to ensure that our people and their families are as safe as possible, especially when transporting their children. That's why we host periodic car seat checks and installations for our employees—no matter what brand of car seat they use. Our certified in-house safety passenger technicians teach employees how to properly install their car seat and fit it to their child. In 2019, more than 90 employees were certified as safety passenger technicians in both the U.S. and Canada.

ABOUT NEWELL BRANDS

Diversity & Inclusion

Our Approach

At Newell Brands, 'diversity' is the blending of backgrounds, experiences and perspectives within a team. 'Inclusion' is the support for a collaborative environment that values open participation from individuals with different ideas and perspectives.

together@newell, our global diversity and inclusion (D&I) program, reflects our company's commitment to both of these values.

In 2019, we appointed a Chief Diversity Officer to oversee all D&I initiatives for the company; an important pillar to the overall Newell Brands People Strategy. The Chief Diversity Officer shares progress, updates and learnings at Executive Leadership Team meetings and with the Board of Directors. Our Chief Diversity Officer travels widely to Newell Brands sites, meeting with employees in small groups and one-onone to promote diversity and inclusion and collect feedback on current and future D&I priorities.



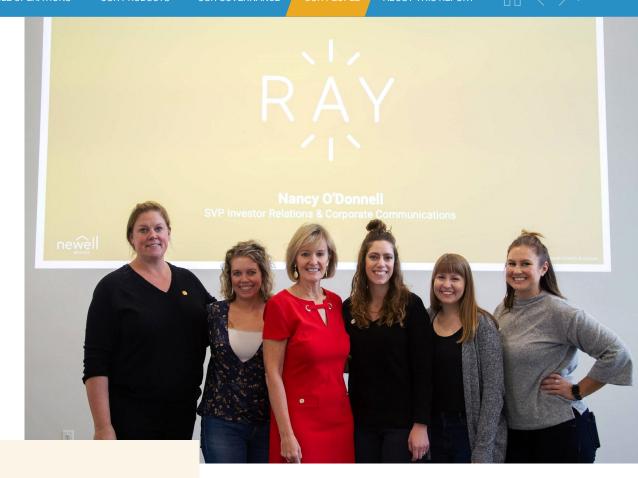
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together@newell

In the short term, together@newell focuses on two areas.

- 1 Inclusivity of underrepresented employees
- 2 Advancing women and people of color (POC) in leadership positions

To enhance inclusivity of underrepresented employees, Newell Brands re-launched two employee resource groups (ERGs) in three locations in the fall of 2019. Our ERGs are voluntary, employee-led organizations open to all, designed to foster a diverse, inclusive workplace by providing opportunities for employees to join forces, build relationships and develop leadership skills.





RAY, a women's resource group in Atlanta, GA, Huntersville, NC and Kalamazoo, MI: RAY provides its members opportunities to use their strengths, abilities and talents to support and empower all women at Newell Brands.



BEACON, (Black Employees Achieving, Connecting and Operating in Newell), a resource group in Atlanta, GA: The group supports an inclusive and diverse environment to recruit and develop Black employees at Newell Brands. We will continue to strengthen and expand ERGs to new locations based on employee interest. Additionally, we are developing methods to help our employees and leaders recognize unconscious bias, and to support the complex discussions that are needed to counteract its adverse effects in our corporate culture. We plan to pilot this programming in select teams during 2020.

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Workforce Demographics



Note: POC = People of Color, defined as that group of U.S. employees who self-identify their ethnicity as other than white/Caucasian.

To advance in our second focus area, Newell Brands set corporate goals to improve year-over-year representation of women in Leadership and Director roles and above, and year-over-year representation of People of Color (POC) in management roles. We are creating slates of diverse candidates in our hiring and recruitment, using diverse interview panels and incorporating D&I discussions into our talent review and calibration discussions. We are working to establish meaningful development efforts for women and POC that address the path to success at Newell Brands.



Board Diversity

Of the 12 members of our Board of Directors in 2019, three are women and three are People of Color.



Fair Compensation

In the U.S., we instituted a policy of no longer questioning external job candidates about their current salary, avoiding the potential compounding of discrimination that negatively and disproportionately affects women and POC. Compensation is determined based on the job duties and requirements and the candidate's experience. We are striving to achieve pay parity between male and female executives.

Respectful Workplace Training

We ensure a respectful working environment, free of inappropriate behavior and harassment, and are committed to providing a safe, secure and healthy workplace for every employee.

Our Respect in the Workplace training covers harassment-free workplace guidelines through an inperson, interactive session of best practices that support our Code of Conduct. This required course ensures that employees are provided with Newell Brands' equal employment opportunity, anti-harassment, non-retaliation and reporting policies, and that they understand how to report related concerns.

In 2019, 14 of our locations received this training from subject matter experts in the company's legal department. For 2020, we are building the next version of our Respect in the Workplace training to address more nuanced and subtle scenarios that help our employees think beyond the typical legal training.

TRODUCTION

Community

Our Approach

Newell Brands' corporate philanthropy efforts are overseen by our Vice President of Global Corporate Communications, Events & Philanthropy, who also collaborates with employees at the operating business level on key community initiatives.

Our new philanthropy and volunteer program, give@newell, was launched in 2018. In 2019, we reinvigorated our corporate foundation, the Newell Brands Charitable Foundation. To spread the word among our global community of 30,000 employees, we began publishing quarterly newsletters and launched a dedicated CSR, D&I and philanthropy communications channel on our employee app to raise awareness and engage employees in our efforts.

2019 Highlight







give@newell

The program aims at making a positive difference in our communities. As a company, we are deeply committed to empowering our employees to give back.

Through give@newell, we offer online tools to help our employees find and create volunteer projects and track their hours. We have an incentive program that awards Newell Brands products to employees who log eight, 16 or 20 hours on the platform within a calendar year. Eligible employees also receive eight hours of VTO annually to support qualified popprofit organizations.

give@newell strives to enable employees to volunteer when and where they want, sharing their time and skills to support the surrounding communities and coming together as teams with strong, shared community spirit.

Newell Brands Charitable Foundation

The Newell Brands Charitable Foundation is committed to making life better by supporting eligible 501(c)(3) charitable organizations that align with our businesses and are important to our employees.

In 2019, we established giving pillars that focus our efforts on the areas where we can make the greatest impact.



We have meaningful partnerships with organizations in each of these pillars, such as Atlanta Public Schools, The American Red Cross, KaBOOM! and the Children's Hospital of Atlanta.

Since disasters can have a devastating impact on the lives of our employees, neighbors, business partners, customers and consumers, the Newell Brands Charitable Foundation partners with disaster relief organizations such as The American Red Cross in times of crisis. We strive to respond to states of emergency with corporate support, donations of product and employee contributions through corporate matches.



Local Impact Grant Program











The Environment

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Atlanta Public Schools Back to School Bash

For the past five years, Newell Brands has sponsored the Atlanta Public Schools "Back to School Bash," an event where students receive free school supplies, healthcare and more. In addition to in-kind and monetary support, Newell Brands sends 100+ volunteers annually. To date, Newell Brands' Writing, Baby and Food businesses have donated more than 285,000 products to the Bash, filled more than 10,000 backpacks with school supplies and impacted nearly 30,000 lives.



Newell Brands x KaBOOM!

In 2017, we joined efforts with KaBOOM!, a national nonprofit dedicated to giving all kids great, safe places to play. Through the Newell Brands Charitable Foundation, we fund and help build playgrounds in the communities closest to the company's operations. Each project under this initiative is achieved with the help of Newell Brands employee volunteers across the U.S. In 2019, we completed eight play spaces in underserved areas located near our business operations in Atlanta, GA; South Deerfield, MA; Miami/Boca Raton, FL; Chicago, IL; High Point, NC and Hoboken, NJ.



Sistema School Starter Program

As part of the Sistema® School Starter Program, an initiative that encourages waste-free and healthy lunches, Sistema donated 15,000 Lunch Cube Maxes to low-income elementary students in more than 250 schools in New Zealand. Sistema's Lunch Cubes are free of phthalates and BPA, and they contain multiple compartments to keep food separate, eliminating the need for disposable packaging or plastic wrap.

Baby Safety Awareness Month

Graco® partnered with nonprofit organization Baby2Baby to help families in need gain access to the necessary baby gear to keep little ones safe. Graco donated more than \$250,000 in product donations including car seats, strollers and high chairs to children living in poverty that Baby2Baby serves. Educational materials on car seat safety and safe sleep accompanied the donation, helping to support Baby2Baby's programs and providing parents with information on how to keep their children safe. Newell Brands supported this effort as well via a corporate gift to Baby2Baby's Sweet Dreams initiative, which helps provide every child with a safe place to sleep, recognizing that the cost of safe sleep options is prohibitive for many low-income families.

Kids in Need Foundation

In 2018, the Newell Brands Writing business donated more than \$1 million in product to the Kids in Need Foundation, a nonprofit that provides free school supplies to children in underserved communities across the U.S. Donated items included Prismacolor® art kits, Paper Mate® coloring books, Elmer's® glue and Sharpie® pens.



Global Environmental Volunteering

Across the globe our teams regularly get together on a variety of environmental volunteering projects to support causes they care about locally.

In celebration of "Let's Clean up the Czech Republic Day," 31 Yankee Candle® employees from our Most, Czech Republic facility and 22 of their children took time out of their weekend to make their neighborhood greener. The group cleaned up 264 pounds (about 119 kilograms) of waste in the area surrounding the facility.

On World Water Day, annually held on March 22, the Outdoor & Recreation team in Pouso Alegre, Brazil, organized a waste collection event for the public to bring in kitchen oils for proper disposal. In total, 100 liters of oil were collected.

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INTRODUCTION

Our 2019 CSR Report references widely adopted standards for sustainability reporting:

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- Global Reporting Initiative (GRI) Standards: These help businesses and governments understand and communicate their impact on a variety of sustainability issues in a common format.
- Sustainability Accounting Standards Board (SASB): These standards focus on sustainability topics of particular interest to investors; we have considered topics within the Household and Personal Care Products category.

Please see our Content Index for a full list of GRI and SASB disclosures addressed in this report.

For more information or questions regarding this report or CSR at Newell, please contact media@newellco.com

Newell Brands Corporate Headquarters

6655 Peachtree Dunwoody Road Atlanta, GA 30328 newellbrands.com/contact

Forward-Looking Information

OUR GOVERNANCE

OUR PRODUCTS

Some of the statements in this report, particularly those related to future goals, commitments and programs as well as business performance and objectives are forward-looking statements within the meaning of the U.S. Private Securities Litigation Reform Act of 1995. These statements generally can be identified by the use of words or phrases, including, but not limited to, "intend," "anticipate," "believe," "estimate," "project," "target," "plan," "expect," "setting up," beginning to," "will," "should," "would," "resume" or similar statements. We caution that forward-looking statements are not guarantees because there are inherent difficulties in predicting future results. Actual results may differ materially from those expressed or implied in the forward-looking statements. Important factors that could cause actual results to differ materially from those suggested by the forward-looking statements can be found in our current and periodic reports filed with the U.S. Securities and Exchange Commission, including with limitation our 2019 Annual Report on Form 10-K.

OUR PEOPLE

ABOUT THIS REPORT



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Stakeholder Engagement

We believe that integrity and transparency build long-lasting relationships with employees, customers, consumers, suppliers, business partner and investors. These relationships are foundational to our success as a company. The table below outlines our approach to maintaining honest and transparent communication with all Newell Brands' stakeholder groups.

Stakeholder Group	Type Of Engagement
Employees	 Communication via regular content on employee mobile app, company-wide emails, company HR portal and corporate social media channels All company and department town halls, quarterly global meetings and meetups with leadership CFO-led, employee facing "Earnings Explained" calls Quarterly newsletter on Sustainability, Philanthropy and Diversity Employee engagement surveys Manufacturing meetings and walkthroughs Digital Signage Leadership videos and podcasts Monthly leader toolkits
Community	 Charitable contributions of product, employee time and financial support Face-to-face meetings for community program development
Consumers	 Marketing campaigns Consumer careline Social media postings on brand channels Social media postings on corporate channels

Retail Customers and Partners	 Communication via e-mails, calls and meetings On-site visits Annual customer surveys Special collaboration projects, such as: Walmart's Project Gigaton Walmart's Sustainability Index Joint training with Walmart on Forced Labor Training sessions at our Annual Supplier Training events
Suppliers	 Direct communication via e-mails, calls and meetings Supplier audits and corrective action plans In-factory training sessions Annual supplier training events
Distributors	Direct communication via e-mails, calls and meetingsOccasional on-site visits
Industry Associations	 Special collaboration projects, such as: How2Recycle, Sustainable Packaging Coalition and Carbon Disclosure Project
Investors	 Direct communication via in-person meetings, email and calls Press release and SEC filings Annual meeting of stockholders Quarterly earnings calls Investor and industry conferences
Regulators	 Engagement with governments in countries of operation, as necessary based around international trade Monitoring of regulatory activity Inspection and surveys

Newell Brands 2019 CSR Report Content Indices (GRI & SASB)

GRI - General Disclosures

GRI Standard	Disclosure	Location / Direct Answer		
ORGANIZATIONAL PROFILE				
GRI 102:	102-1 Name of the organization	Newell Brands		
General Disclosures	102-2 Activities, brands, products and services	About Newell Brands		
	102-3 Location of headquarters	Atlanta, Georgia, US		
	102-4 Location of operations	About Newell Brands		
	102-5 Ownership and legal form	Newell Brands is a publicly traded company on the New York stock exchange under the symbol "NWL"		
	102-6 Markets served	About Newell Brands		
	102-7 Scale of the organization	About Newell Brands		
	102-8 Information on employees and other workers	About Newell Brands; Diversity & Inclusion		
	102-9 Supply chain	Responsible Sourcing		
	102-10 Significant changes to the organization and its supply chain	Newell Brands was created in 2016 through a merger between Jarden and Newell Rubbermaid. This is the company's first report referencing GRI guidelines or standards.		
	102-12 External initiatives	Stakeholder Engagement		
	102-13 Membership of associations	Stakeholder Engagement		
STRATEGY	<i>,</i>			
	102-14 Statement from senior decision-maker	CEO Message		
	102-15 Key impacts, risks, and opportunities	Stakeholder Engagement		
ETHICS & I	NTEGRITY			
	102-16 Values, principles, standards and norms of behavior	Ethics & Compliance; About Newell Brands; Business Ethics; Code of Conduct		
	102-17 Mechanisms for advice and concerns about ethics	Ethics & Compliance; Code of Conduct		

GOVERNA	NCE	
	102-18 Governance structure	Corporate Governance; Corporate Governance website
	102-20 Executive-level responsibility for economic, environmental, and social topics	Corporate Governance
	102-22 Composition of the highest governance body and its committees	Corporate Governance; Corporate Governance website
	102-23 Chair of the highest governance body	Corporate Governance; Corporate Governance website
STAKEHOL	DER ENGAGEMENT	
	102-40 List of stakeholder groups	Stakeholder Engagement
	102-41 Collective bargaining agreements	Talent Development
	102-42 Identifying and selecting stakeholders	Stakeholder Engagement
	102-43 Approach to stakeholder engagement	Stakeholder Engagement
REPORTIN	G PRACTICES	
	102-46 Defining report content and topic Boundaries	Stakeholder Engagement
	102-47 List of material topics	Stakeholder Engagement; Our Products; Our People; Our Operations; Our Governance
	102-48 Restatements of information	This is the first CSR Report for Newell Brands and therefore does not contain restatements of information.
	102-49 Changes in reporting	This is the first CSR Report for Newell Brands.
	102-50 Reporting period	About This Report
	102-51 Date of most recent report	This is the first CSR Report for Newell Brands.
	102-52 Reporting cycle	This is the first CSR Report for Newell Brands.
	102-53 Contact point for questions regarding the report	About This Report
	102-54 Claims of reporting in accordance with the GRI Standards	About This Report
	102-55 GRI content index	Content Index
	102-56 External assurance	Climate, Energy & Emissions; Verification Statement

GRI - SPECIFIC DISCLOSURES

GRI Standard	Disclosure	Location / Direct Answer	
ECONOMIC F	ECONOMIC PERFORMANCE		
GRI 201-1	Direct economic value generated and distributed	About Newell Brands	
MATERIALS			
GRI 103:	103-1 Explanation of the material topic and its Boundary	Innovation & Sustainability	
Management Approach	103-2 The management approach and its components	Innovation & Sustainability	
	103-3 Evaluation of the management approach	Innovation & Sustainability	
ENERGY			
GRI 103: Management	103-1 Explanation of the material topic and its Boundary	Climate, Energy & Emissions; Environmental Management	
Approach	103-2 The management approach and its components	Climate, Energy & Emissions; Environmental Management	
	103-3 Evaluation of the management approach	Climate, Energy & Emissions; Environmental Management	
GRI 302:	302-1 Energy consumption within the organization	Climate, Energy & Emissions	
Energy	302-4 Reduction of energy consumption	Climate, Energy & Emissions	
WATER			
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Water & Land; Environmental Management	
	103-2 The management approach and its components	Water & Land; Environmental Management	
	103-3 Evaluation of the management approach	Water & Land; Environmental Management	
GRI 303: Water (2018)	303-5 Water consumption	Water & Land	

EMISSIONS		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Climate, Energy & Emissions; Environmental Management
	103-2 The management approach and its components	Climate, Energy & Emissions; Environmental Management
	103-3 Evaluation of the management approach	Climate, Energy & Emissions; Environmental Management
GRI 305:	305-1 Direct (Scope 1) GHG emissions	Climate, Energy & Emissions
Emissions	305-2 Indirect (Scope 2) GHG emissions	Climate, Energy & Emissions
	305-5 Reduction of GHG emissions	Climate, Energy & Emissions;
WASTE		
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Waste; Environmental Management
	103-2 The management approach and its components	<u>Waste;</u> Environmental Management
	103-3 Evaluation of the management approach	Waste; Environmental Management
GRI 306: Effluents & Waste	306-2 Waste by type and disposal method	Waste
ENVIRONME	NTAL COMPLIANCE	
GRI 103:	103-1 Explanation of the material topic and its Boundary	Environmental Management
Management Approach	103-2 The management approach and its components	Environmental Management
	103-3 Evaluation of the management approach	Environmental Management
SUPPLIER E	NVIRONMENTAL ASSESSMENT	
GRI 103:	103-1 Explanation of the material topic and its Boundary	Responsible Sourcing
Management Approach	103-2 The management approach and its components	Responsible Sourcing
	103-3 Evaluation of the management approach	Responsible Sourcing

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GRI Standard	Disclosure	Location / Direct Answer
EMPLOYME	NT	
GRI 103: Management Approach	103-1 Explanation of the material topic and its Boundary	Talent Development; Wellness & Safety
	103-2 The management approach and its components	Talent Development; Wellness & Safety
	103-3 Evaluation of the management approach	Talent Development; Wellness & Safety
GRI 401: Employment	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Wellness & Safety
OCCUPATIO	NAL HEALTH & SAFETY	
GRI 103:	103-1 Explanation of the material topic and its Boundary	Wellness & Safety
Management	103-2 The management approach and its components	Wellness & Safety
Approach	103-3 Evaluation of the management approach	Wellness & Safety
GRI 403: Occupational Health & Safety	403-1 Occupational health and safety management system	Wellness & Safety
	403-2 Hazard identification, risk assessment, and incident investigation	Wellness & Safety
	403-3 Occupational health services	Wellness & Safety
	403-4 Worker participation, consultation, and communication on occupational health and safety	Wellness & Safety
	403-5 Worker training on occupational health and safety	Wellness & Safety
	403-6 Promotion of worker health	Wellness & Safety
	403-8 Workers covered by an occupational health and safety management system	Wellness & Safety
	403-9 Work-related injuries	Wellness & Safety
TRAINING &	EDUCATION	
GRI 103:	103-1 Explanation of the material topic and its Boundary	Talent Development
Management Approach	103-2 The management approach and its components	Talent Development
	103-3 Evaluation of the management approach	Talent Development
GRI 404: Training and Education	404-2 Programs for upgrading employee skills and transition assistance programs	Talent Development

DIVERSITY 8	EQUAL OPPORTUNITY	
GRI 103:	103-1 Explanation of the material topic and its Boundary	Diversity & Inclusion
Management Approach	103-2 The management approach and its components	Diversity & Inclusion
	103-3 Evaluation of the management approach	Diversity & Inclusion
GRI 405: Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	Diversity & Inclusion
HUMAN RIG	HTS ASSESSMENT	
GRI 103:	103-1 Explanation of the material topic and its Boundary	Ethics & Compliance
Management Approach	103-2 The management approach and its components	Ethics & Compliance
	103-3 Evaluation of the management approach	Ethics & Compliance
GRI 412: Human Rights Assessment	412-2 Employee training on human rights policies or procedures	Ethics & Compliance; Respectful Workplace Training
LOCAL COM	MUNITIES	
GRI 103:	103-1 Explanation of the material topic and its Boundary	Community
Management Approach	103-2 The management approach and its components	Community
	103-3 Evaluation of the management approach	<u>Community</u>
GRI 413: Local Communities	413-1 Operations with local community engagement, impacts assessments, and development programs	Community
SUPPLIER S	OCIAL ASSESSMENT	
GRI 103:	103-1 Explanation of the material topic and its Boundary	Responsible Sourcing
Management	103-2 The management approach and its components	Responsible Sourcing
Approach	103-3 Evaluation of the management approach	Responsible Sourcing
CUSTOMER	HEALTH & SAFETY	
GRI 103: Management	103-1 Explanation of the material topic and its Boundary	Innovation & Sustainability
Approach	103-2 The management approach and its components	Innovation & Sustainability
	103-3 Evaluation of the management approach	Innovation & Sustainability
GRI 416: Customer Health & Safety	416-1 Assessment of the health and safety impacts of product and service categories	Innovation & Sustainability_

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SASB INDEX

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This index reflects SASB disclosures under the Household & Personal Products subcategory, which is the designation that SASB has assigned to Newell Brands. We also considered relevant metrics under other Consumer Goods subcategories that are relevant to parts of our diversified business, and have referenced those where applicable:

Sustainability Disclosure Topics & Accounting Metrics		
TOPIC	ACCOUNTING METRIC	RESPONSE/LOCATION
	CG-HP-140a.1 Total water withdrawn: Thousand cubic meters (m³) CG-HP-140a.1 Total water consumed:	While water has not been identified as a material issue for the company, Newell Brands continues to track and evaluate water usage and strives to reduce consumption over time. See report section on Water & Land.
	Percentage (%)	
Water Management	CG-HP-140a.1 Percentage of each in regions with High or Extremely High Baseline Water Stress	
	CG-HP-140a.2 Description of water management risks and discussion of strategies and practices to mitigate those risks	
Product Environmental, Health, and Safety Performance	CG-HP-250a.1 Revenue from products that contain REACH substances of very high concern (SVHC)	Newell Brands currently does not track these revenue-related disclosures.
	CG-HP-250a.2 Revenue from products that contain substances on the California DTSC Candidate Chemicals List	
	CG-HP-250a.4 Revenue from products designed with green chemistry principles	
	CG-HP-250a.3 Discussion of process to identify and manage emerging materials and chemicals of concern	Product Innovation & Safety
	CG-TS-250.a.1 Number of (1) recalls and (2) total units recalled	Product Innovation & Safety

Packaging Lifecycle Management	CG-HP-410a.1 Total weight of packaging: Metric tons	We'll be evaluating for future reports.
	CG-HP-410a.1 Percentage made from recycled and/or renewable materials: Percent (%)	
	CG-HP-410a.1 Percentage that is recyclable, reusable, and/or compostable: Percent (%)	
	CG-HP-410a.2 Discussion of strategies to reduce the environmental impact of packaging throughout its lifecycle	Product Innovation & Safety
Environmental & Social Impacts of Palm Oil Supply Chain	CG-HP-430a.1 Amount of palm oil sourced: Metric tons	We'll be evaluating for future reports.
	CG-HP-430a.1 Percentage certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book & claim: Percent (%)	
Labor Conditions in the Supply Chain	CG-TS-430a.1 Number of facilities audited to a social responsibility code of conduct	Responsible Sourcing
ACTIVITY METRI	cs	
METRIC		RESPONSE/LOCATION
CG-HP-000.B Number of manufacturing facilities		45

OUR GOVERNANCE



Independent Third-Party Review and Verification Statement

Sustainable Futures (SF) was engaged by Newell Brands (NWL) to conduct an internal audit and provide a third party review and verification statement as to whether selected GHG/energy consumption data for 2016 calendar year and Q4 2018 – Q3 2019, as reported by facilities are reliable for corporate social responsibility reporting purposes.

This review is made solely to Newell Brands in accordance with the scope of work and terms of our engagement. Our work has been undertaken so that we might state to Newell Brands those matters that we have been engaged to state in this report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume any responsibility to anyone other than Newell Brands for our work, for this independent review, or for the conclusions we have reached.

Nature and Scope of Review

SF was asked to review the corporate and facility level natural gas, purchased electricity, consumption data and associated GHG emissions reported by the top consumers out of Newell's facilities for the calendar year 2016 and Q4 2018 - Q3 2019. As such, SF is not providing verification for the wider scope of emissions sources that Newell collect data and report on (e.g. fuel oil, purchased steam, refrigerants, business travel and vehicle fleet). However, consumption in the reviewed facilities accounts for over 10% of total consumption and as such represents a significant sample upon which to base findings on the overall reported KPI values.

The energy/GHG data review followed the GHG reporting and calculation guidelines contained in the Greenhouse Gas Protocol, published by the World Resources Institute. The facility level review activities, conducted during November 2019 and January 2020, included:

- Examining processes and understanding key assumptions and limitations;
- Site visits to audit selected sustainability performance indicators, systems and processes in place.
- Interviews to understand the data collation, systems and reporting processes; and
- A review of sampled invoices and other documentary evidence of the data at facility and corporate level.

For the purposes of this work, an error or omission was considered to be material if it represented greater than 5% of the inventory for the facility being reviewed or resulting in a 1% or more variation of Newell's total energy consumption.

SF has not been involved in defining the data to be collected prior to this engagement nor designing the process of data collection and reporting.

Conclusions

Based on the work performed, nothing has come to our attention to indicate that the energy and GHG reported data are in any way materially misstated. It is our professional judgement that in all material respects, the 2016 calendar year and Q4 2018 - Q3 2019 data for the sustainability KPIs of natural gas, purchased electricity are reliable for corporate reporting purposes.

