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newell  
BRANDS

# OF CONDUCT

*Delighting consumers by lighting up everyday moments*



TABLE OF

CONTENTS



1.0

<b>WE COMMIT TO DOING THE RIGHT THING</b>	<b>3</b>
Message from Our President and CEO	4
Message from Our Chair of the Board	5
Living our Values	6
Our Code of Conduct	7
Our Speak-Up Culture	10

2.0

<b>WE COMMIT TO EACH OTHER</b>	<b>14</b>
Promote respect and inclusion in the workplace	15
Maintain a healthy and safe workplace	16
Ensure fair employment practices	19

3.0

<b>WE COMMIT TO OUR COMPANY</b>	<b>20</b>
Maintain accurate books and records	21
Avoid or disclose conflicts of interest	23
Appropriate gifts and entertainment	24
Protect and use company assets responsibly	25
Communicate about our company responsibly	27
Safeguard confidential information	28
Protect the privacy of personal data	30

4.0

<b>WE COMMIT TO OUR MARKETPLACE</b>	<b>31</b>
Engage in fair dealing	32
Ensure product safety	33
Avoid insider trading	34
Comply with competition laws	35
No bribery	36
Prevent money laundering	38
Comply with trade compliance laws	39

5.0

<b>WE COMMIT TO OUR COMMUNITY</b>	<b>40</b>
Protect our resources	41
Contributions	42

---

<b>RESOURCES</b>	<b>44</b>
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# 1.0

## WE COMMIT TO DOING THE RIGHT THING

MESSAGE FROM OUR PRESIDENT AND CEO >

MESSAGE FROM OUR CHAIR OF THE BOARD >

LIVING OUR VALUES >

OUR CODE OF CONDUCT >

OUR SPEAK-UP CULTURE >



# MESSAGE

## FROM OUR PRESIDENT AND CEO



### DEAR COLLEAGUES,

For more than a century, Newell has been a manufacturer of high-quality, consumer goods. And while our portfolio has grown over the years, one thing remains the same: we are committed to delighting consumers by lighting up everyday moments.

The iconic brands that make up Newell today are trusted names in households around the world. Our incredible legacy of excellence, trust and innovation is something we are proud of – and something we are all responsible for upholding. The longevity and success of Newell is a testament to our shared Values of Integrity, Teamwork, Ownership, Leadership and a Passion for Winning. These Values embody our commitment to doing what's right – for our consumers, our customers, our shareholders, our communities and each other.

In today's dynamic business environment, the trust we've earned over generations can be strengthened – or eroded – by the decisions we make. This is why our Code of Conduct is so essential. It is more than just a set of guidelines – it reflects who we are, what we stand for and how we strive to operate every day.

While our Code does not cover every situation that we may encounter, it sets forth basic principles that guide us in making the right decisions. I encourage each employee to review our Code of Conduct and integrate its principles into your daily activities. Upholding our Code of Conduct is not just a corporate mandate, it is a personal responsibility that each of us carries.

By living Newell's Values and following our Code, not only do we safeguard our legacy, but we also create a high-performing, innovative and inclusive culture where everyone can thrive and help ensure our long-term success. Thank you for your dedication and commitment to upholding the highest standards.

**Chris Peterson**  
*President and CEO, Newell Brands*





MESSAGE

FROM OUR CHAIR OF THE BOARD



DEAR COLLEAGUES,

As Chair of the Board, I am honored to present our company's Code of Conduct. This Code is a cornerstone of our commitment to ethical business practices and reflects our fundamental belief in doing what is right.

The Board is fully committed to embodying the principles outlined in our Code, which foster a culture of integrity throughout our organization. By doing so, we are building a sustainable and prosperous future for our company and community.

To our employees, thank you for your dedication to our Code of Conduct and for upholding the high standards that define who we are. And to our stakeholders, thank you for trusting us to deliver on our commitments and to guide our organization through the lens of Newell's Values.

Bridget Ryan Berman

Bridget Ryan Berman  
Chair of the Board, Newell Brands





# VALUES

## LIVING OUR

At Newell Brands, our Values drive our high-performing, innovative and inclusive culture. We are committed to living our Values in all that we do as One Newell.



### INTEGRITY

Build and Maintain Credibility

### TEAMWORK

Succeed Together

### PASSION FOR WINNING

Create Superior Value for Our Customers

### OWNERSHIP

Act Like a Responsible Owner

### LEADERSHIP

Inspire Boldness





# OUR CODE OF

# CONDUCT



Our commitment to operating ethically is central to our success.

Our Code guides us in making ethical decisions, but it cannot cover every situation that may arise. You must use good judgment to make choices consistent with our Company's Values of Integrity, Teamwork, Passion for Winning, Ownership and Leadership. It's important that everyone at Newell – from our directors to our interns – thoroughly understands and adheres to our Code in all business dealings. If you are unclear about your obligations under the Code, speak up and ask your manager, HR or a member of the Legal team for guidance.

When a local practice suggests a less stringent standard than our own, follow our Code to ensure we are operating with the highest ethical standards. If you have questions about specific laws or regulations or believe there is a conflicting legal obligation under the laws of different countries, contact the Legal team.





# OUR CODE APPLIES TO ALL OF US

- Employees of Newell Brands regardless of location, seniority, business segment or function
- Members of our Board of Directors
- Executive Officers
- Third parties working on our Company's behalf, including agents, representatives, independent contractors and consultants, must follow standards equivalent to our Code



We all must follow the provisions in our Code. Keep in mind that violations of our Code may result in disciplinary action, in accordance with applicable law, up to and including termination; and, in some cases, legal action.

If you believe that you require a waiver of a specific provision, request approval from the Chief Ethics & Compliance Officer. Executive officers and directors must submit waiver requests to the Nominating/Governance Committee of the Board of Directors. If approved, Newell Brands will promptly disclose such waivers as required by law.





## MANAGERS SET THE TONE FOR AN ETHICAL WORKPLACE



Managers are responsible for ensuring that their teams act with integrity. If you are a manager, we look to you to:

- Model our Values in Action.
- Understand our Code, as well as the policies and laws that apply to your team.
- Promote a speak-up culture where employees feel comfortable asking questions and raising concerns.
- Report ethics and compliance concerns through the appropriate channel.
- Never respond in a retaliatory manner and ensure your team understands the importance of our non-retaliation policy.

## what if?

**I am a manager and one of my direct reports reached out to me with concerns related to disrespectful treatment by another employee. What do I do?**

*Thank the employee for speaking up and let them know their concerns will be handled confidentially according to our company's Speak Up and Anti-Retaliation Policy. If you are not able to directly address the concerns, then reach out to HR or Ethics & Compliance for additional guidance.*



# OUR SPEAK-UP



# CULTURE

When you seek advice, raise a concern, report suspected misconduct or cooperate with an investigation you are complying with our Code and living our Values. Our Company believes in creating a culture where employees feel comfortable speaking up and knowing that if you do speak up, you will be heard. You may reach out to your manager, HR, or any of the resources listed on the Resources page.

We all have a responsibility to report actual or suspected violations of our Code of Conduct. Ignoring problems makes them worse and can harm others or our Company. If you receive a report, forward it to the Ethics & Compliance team. Do not take it upon yourself to investigate the report.





## WHAT IS THE ETHICS HOTLINE?



The Ethics Hotline is a confidential way to ask questions or share concerns about potentially unethical conduct. The hotline is operated by an independent, third-party company and is available 24 hours a day, 7 days a week.

When you contact the Ethics Hotline you may make a report in your own language. Your report will be documented and sent to Ethics & Compliance to address promptly, discreetly and, to the extent possible, confidentially.

## what if?

**I am not satisfied with the resolution of a report I made to the Ethics Hotline. What should I do?**

*Contacting the Ethics Hotline initiates a process designed to ensure a thorough review of your concern that concludes with an appropriate resolution, including addressing conduct that does not meet our standards. If you continue to have concerns after an investigation is completed, please contact Ethics & Compliance for additional consideration.*



## → WHAT HAPPENS AFTER I MAKE A REPORT TO ETHICS & COMPLIANCE?

Ethics & Compliance will inform you that we have received your report. We will objectively investigate the facts related to your report, requesting support from other Company functions, as needed. In order to ensure that we are able to conduct a thorough investigation, you may be contacted for additional information related to your report.

If you are contacted to assist with an investigation, you have an obligation to cooperate. This means that you must respond to inquiries truthfully and transparently and provide information that is requested. Never conceal information or alter or destroy documents related to the investigation.

Ethics & Compliance will inform you when the investigation is complete. The results of the investigation may not be disclosed to you, but rest assured that the company takes findings of misconduct seriously and will ensure we address any issues.

## what if?

I reported conduct that concerned me to my manager, but she told me not to worry about it. What should I do?

*If you are not satisfied by your manager's response to your report, then reach out to Ethics & Compliance. You should feel that your concerns are being heard and addressed.*

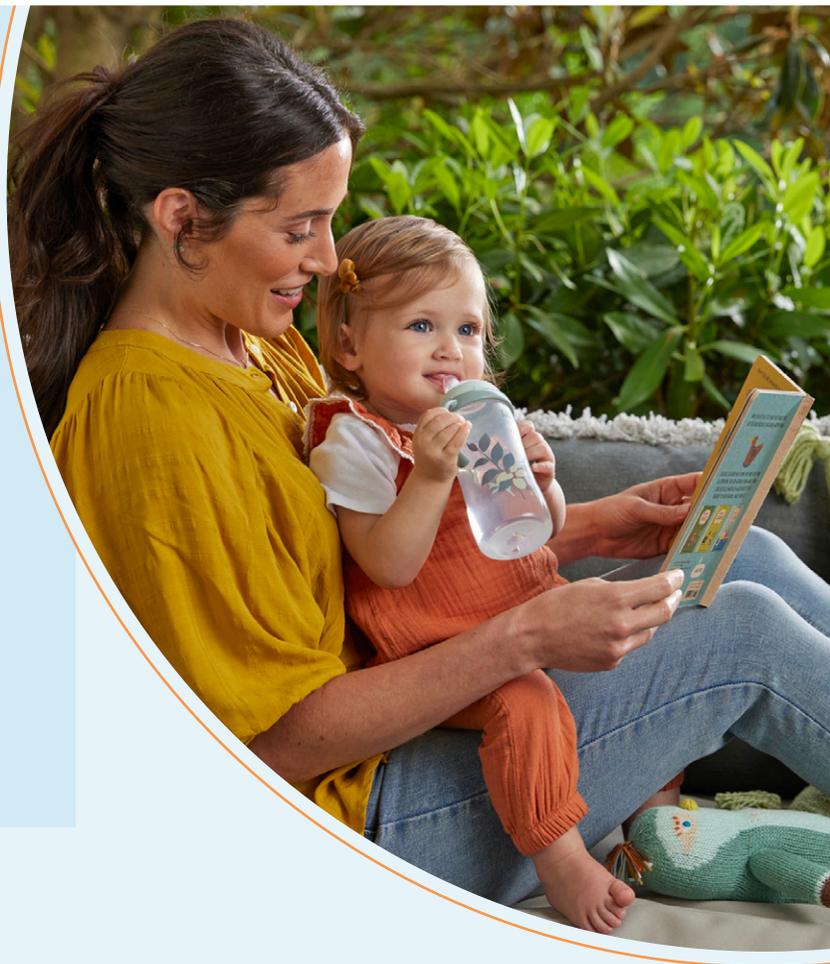




## OUR NON-RETALIATION POLICY

You will not be retaliated against in any way for raising a concern in good faith. Raising a concern in “good faith” means that you are sincere in providing honest and accurate information, even if it later turns out that you are mistaken.

Forms of retaliation include losing your job, being demoted, suspended, threatened, harassed, victimized or being discriminated against. Retaliation is illegal and we take claims of retaliation seriously – anyone found to have committed a retaliatory act is subject to disciplinary action, up to and including termination. If you or someone you know is the victim of retaliation, report it immediately. If you are ever concerned about your personal safety, contact Global Security.



**CLICK HERE FOR OUR SPEAK UP AND ANTI-RETALIATION POLICY.**



# what if?

**I suspect that my manager is engaging in inappropriate conduct. Should I be concerned about promotion opportunities if I make a report involving him?**

*No. We will never tolerate retaliation against anyone for raising a concern in good faith. If you suspect that something is wrong, you have an obligation to speak up. We will take steps to protect you from retaliation.*

**Will I get in trouble if I am involved in the misconduct that I am reporting?**

*There may be consequences for your actions; however, by speaking up about the conduct and cooperating with the investigation, you will be protected from any retaliatory actions.*





2.0

# WE COMMIT TO EACH OTHER

PROMOTE RESPECT AND INCLUSION IN THE WORKPLACE



MAINTAIN A HEALTHY AND SAFE WORKPLACE



ENSURE FAIR EMPLOYMENT PRACTICES





PROMOTE

# RESPECT AND INCLUSION IN THE WORKPLACE

We promote respect in the workplace through our Values In Action. Inclusion is at the heart of how we work together as a team. By fostering an environment where our multi-cultural and multi-generational workforce feels included, we unlock the full potential of our people to delight the consumers we serve. Prioritizing inclusion fosters innovation and enables high performance as a team.



## what if?

I am a manager and during a business dinner, an employee made flirtatious remarks to a vendor's representative. The representative did not seem to mind, and it was outside of the office. Should I have said something?

*Yes, you have a duty to counsel the employee on appropriate business conduct. Your employee has a responsibility to treat the representative with respect regardless of the meeting location. When you tolerate the inappropriate behavior, you send the message that it is okay.*



### NO HARASSMENT



We must ensure a respectful working environment, free of inappropriate behavior and harassment. You must speak up about intimidating, hostile or offensive workplace behavior, including:

- Making offensive comments, jokes, or slurs about any legally protected status, including race, age and religion.
- Sharing or sending offensive pictures, images, or communications.
- Making sexual remarks, sexual advances, and inappropriate touching or gestures.
- Name calling or directing profanity or threats at another individual.

### NO DISCRIMINATION



We recruit, hire, evaluate, promote, and compensate people based on merit without regard to any legally protected status, including race, color, sexual orientation, gender identity, age, religion, and disability. We also observe all local non-discrimination regulations.



# MAINTAIN A HEALTHY AND SAFE



# WORKPLACE

## SAFE WORK PRACTICES



No production goal, cost savings, time savings or competitive advantage is worth an injury or illness. Our Company's occupational safety standards and guidance are based on industry best practices. We are committed to providing a workplace that meets or exceeds applicable occupational safety and health laws and regulations. Our Company regularly conducts reviews of our facilities and audits our safety practices. You can do your part by following safety and health requirements and promptly reporting any workplace accidents, injuries, illnesses or unsafe conditions (including "near misses").

**A safety guard on one of our machines is broken, but I was told that we do not have the budget to have it repaired. Who should I ask about this?**

*Speak up and report the issue to your site manager, your safety lead or Ethics & Compliance. Protecting our employees is a priority, so do your part to make sure that equipment is functioning safely.*

**My manager suggested that we alter our normal practices to speed up the production line, but I do not think the new process is safe. What should I do?**

*Never compromise when it comes to safety. Contact your site safety lead or Ethics & Compliance, so that a safe course of action can be determined.*

# what if?





# → NO VIOLENCE IN THE WORKPLACE

Acts or threats of violence interfere with our commitment to a healthy and safe workplace and are not tolerated at our Company.

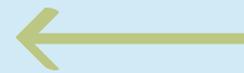
Every employee has a responsibility to:

- Report behaviors that threaten or harm employees in a violent, or potentially violent, manner.
- Refrain from making jokes about harming others.
- Call local law enforcement if you, or someone you know, is in immediate danger (if it is safe for you to do so).
- Never possess weapons, including firearms, knives or clubs, while on Company premises, including Company parking lots, except where otherwise expressly permitted by law.





## A DRUG-FREE AND ALCOHOL-FREE WORKPLACE



Being under the influence of drugs or alcohol can negatively affect job performance, create safety hazards and put you and others at risk. Never engage in work if you are under the influence of any substance. Also, do not possess controlled substances, drugs or drug paraphernalia (other than lawful prescriptions) while on Company premises, in Company vehicles or while performing work-related tasks.

In certain instances, you may be permitted to drink alcoholic beverages at Company events, or while conducting Company business. When doing so, you must exercise both moderation and good judgment, as well as comply with applicable laws and Company policies. Alcohol use is never an excuse for inappropriate behavior at work events. Do not drive if you cannot operate a vehicle safely and legally.

## what if?

**My team went out for after-work drinks and my manager acted in a way that made me uncomfortable. She may have had too much to drink because she has never acted this way before. What should I do?**

*Check in with your manager to make sure she's all right or seek the support of another manager at the outing. If you still have concerns, be sure to raise them to HR or Ethics & Compliance.*





# ENSURE FAIR EMPLOYMENT

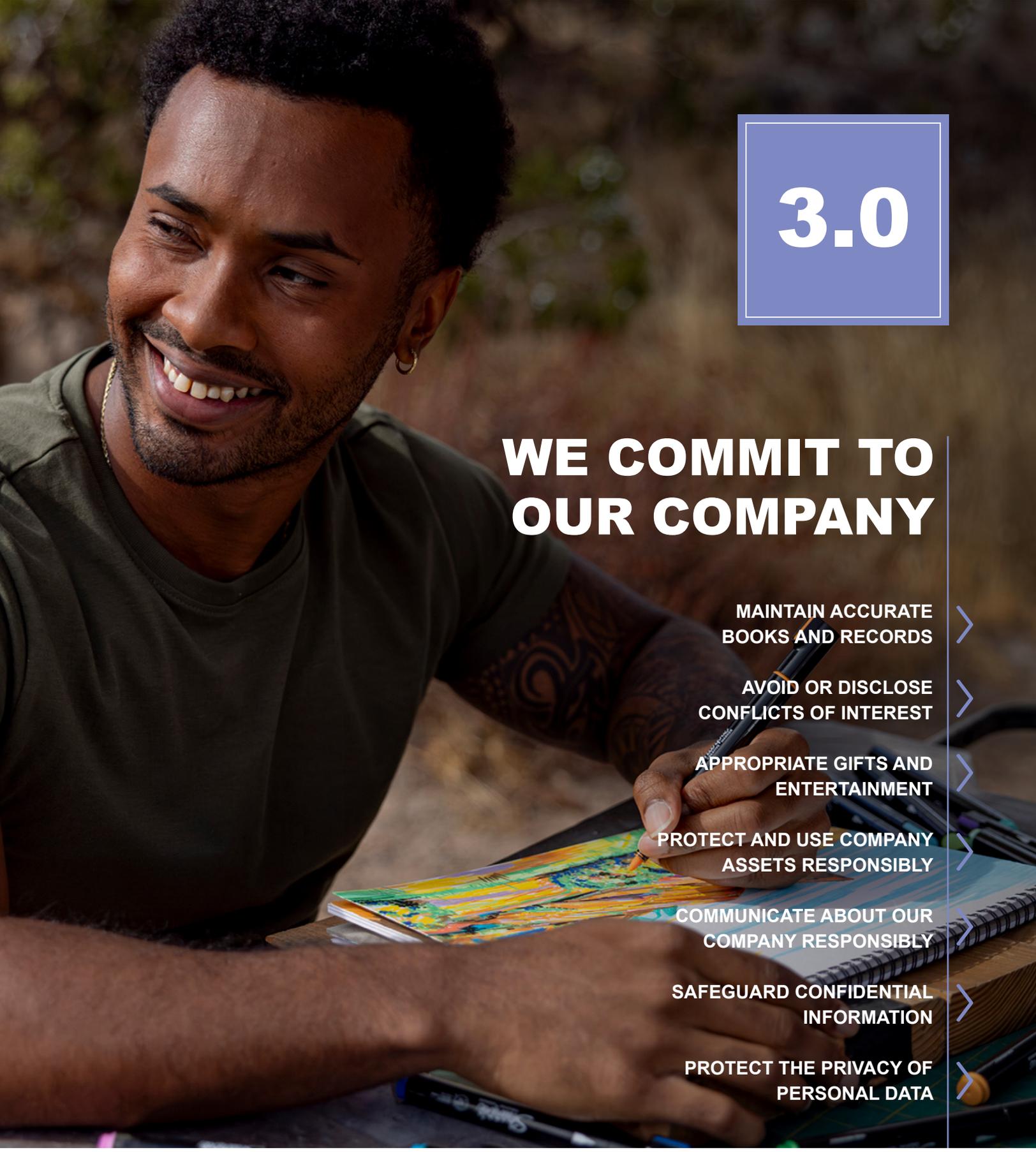


# PRACTICES

Our Company values our employees and engages in ethical labor practices in our global operations and facilities.

- We forbid the use of child labor, forced labor or physical punishment.
- We follow applicable wage and hour laws, including minimum wage, overtime and maximum hour laws.
- We respect our employees' rights to lawful freedom of association and recognize their right to collective bargaining.
- We believe in equal opportunity for all employees.





3.0

# WE COMMIT TO OUR COMPANY

MAINTAIN ACCURATE BOOKS AND RECORDS



AVOID OR DISCLOSE CONFLICTS OF INTEREST



APPROPRIATE GIFTS AND ENTERTAINMENT



PROTECT AND USE COMPANY ASSETS RESPONSIBLY



COMMUNICATE ABOUT OUR COMPANY RESPONSIBLY



SAFEGUARD CONFIDENTIAL INFORMATION



PROTECT THE PRIVACY OF PERSONAL DATA





# MAINTAIN ACCURATE BOOKS AND

# RECORDS

Honesty in our books, records and financial statements is critical to our success and to maintaining the trust of our stockholders and other stakeholders. You must be accurate, transparent, prompt and complete when recording your transactions, including your timesheets and expense reports. Only use Company funds for the purpose described in the documents supporting the payment.



## ENSURE THE INTEGRITY OF FINANCIAL REPORTS



- Follow internal processes, and the laws, rules and regulations that govern financial accounting/reporting, to accurately record assets, liabilities, revenues and expenses.
- Never intentionally delay recording transactions.
- Be honest when making forecasts and ensure that our reports accurately reflect our financial position, as described by the supporting documentation.
- Disclosures we make to government entities and communications to the financial community must be full, fair, accurate, timely, and understandable.



## → COOPERATE WITH AUDITORS

Be open and honest with our internal and external auditors, tax authorities, and other regulators. Do not take any action to coerce, manipulate or mislead anyone auditing or reviewing our Company's financial statements.



## what if?

**My co-worker asked me to punch his timecard for him. What should I do?**

*Timecards are Company records and must be punched by the employee, not a co-worker. Advise your co-worker to speak to his manager if there is an issue, but do not punch the timecard for him.*

**I informed my manager of errors in a report that we are submitting to a government agency. He told me not to worry because 'everyone does it that way.' Should I correct the errors?**

*Never knowingly allow inaccurate information to be submitted to a government agency. Speak up and report your concerns to the Ethics & Compliance team.*





# AVOID

## OR DISCLOSE CONFLICTS OF INTEREST



We must always act in the best interest of our Company. A conflict of interest occurs when you are involved in a relationship or activity that affects your objectivity in making business decisions. It is not possible to list every type of conflict of interest situation, so we rely on you to disclose any situation that is, or could appear to be, a conflict of interest. We can then assess the facts and address the situation.

## what if?

Common conflicts of interest situations that you should be aware of are listed below.

- Investments
- Family and personal relationships
- Contacts with competitors, suppliers, vendors or customers
- Other employment
- Board of Directors
- Personal Gain

**My partner started an online business to sell her homemade candles. Is this okay?**

*Perhaps, depending on the specific details of the activity and your responsibilities at our Company. Regardless, this situation could appear to be a conflict of interest. Therefore, you should discuss it with your manager or HR.*

CLICK FOR ADDITIONAL GUIDANCE.





# APPROPRIATE

## GIFTS AND ENTERTAINMENT

Gifts and entertainment can promote positive professional relationships. However, we must ensure that there is no appearance of an improper attempt to influence business decisions associated with such activities. When giving or receiving a gift or entertainment neither party should feel that they must do something, including promising business, in return for the gift or entertainment.

Any gift or entertainment provided in connection with your job must be transparent and recorded accurately in our books and records. When completing an expense report, you must state the purpose of the expense and the person to whom you gave the gift or entertainment. All gifts to vendors, customers and business partners must be recorded and designated as gifts from the Company.

If you have questions about whether entertainment or a gift is appropriate or how to record such an expenditure, ask your manager or Ethics & Compliance.



CLICK FOR ADDITIONAL GUIDANCE.



## what if?



**I received a gift from a vendor that is valued at \$500 and am not sure if it is appropriate to accept. What should I do?**

*If you are unsure if a gift meets company guidelines, contact Ethics & Compliance for guidance. If you do not feel comfortable accepting the gift, you can always politely decline and return it to the vendor.*

**One of my suppliers sent me tickets to a golf tournament. What should I do?**

*You can accept the tickets if: you are not obligated to treat the supplier favorably in return for the tickets; a business purpose is served (i.e., the supplier will be attending with you); you only occasionally accept tickets from the supplier; and the tickets were purchased at a reasonable price. If any of these conditions are not met, speak to your manager or Ethics & Compliance before accepting.*



# PROTECT

## AND USE COMPANY ASSETS RESPONSIBLY



### COMPANY PROPERTY AND EQUIPMENT



Our Company provides you with the physical and electronic resources you need to do your job. These resources are valuable Company assets, and we trust you to use them appropriately to conduct Company business. You must also protect our Company assets from theft, loss, damage, unauthorized access, waste and abuse. Promptly report any property or equipment that appears damaged, unsafe, defective or in need of repair.



### SOCIAL MEDIA

Social media tools such as blogs, wikis, chatrooms and networking sites provide a valuable outlet to communicate about our Company with stakeholders. However, you must be responsible when using social media and be careful when communicating about our Company. Unless you are explicitly authorized to speak on behalf of our Company, make it clear that your views are your own and do not reflect our Company's position. When required by applicable law, disclose your affiliation with our Company. Never use social media to communicate about confidential information.



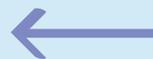
### ARTIFICIAL INTELLIGENCE (AI)

At Newell, we are committed to transparency, accountability and fairness in the use of AI technologies used across the company. Our [Artificial Intelligence \(AI\) Use Policy](#) is designed to help ensure our AI initiatives align with ethical standards and privacy principles that benefit both our company and consumers. We also always safeguard our confidential information when using AI.





## INFORMATION TECHNOLOGY



Information Technology such as hardware, software, e-mail, voicemail, intranet and internet access, computer files and programs are Company property. We rely on you to use these valuable electronic assets appropriately and to protect our systems from malicious actors, unapproved applications and downtime.

- Never install unauthorized software, applications, hardware or storage devices on your Company issued computer.
- Do not use unauthorized physical or cloud storage for Company information.
- Do not access our network through unauthorized applications or devices.
- Do not access, store, send, post or publish material that is inappropriate, discriminatory, sexually explicit, offensive or threatening.

Where legally permitted, we reserve the right to monitor the use of these resources.



## COMPANY RECORDS

Records we generate during the normal course of business are important Company assets. We must ensure that we can access these records if needed, including to comply with regulatory requirements. You are responsible for retaining, storing and disposing of Company records properly and in accordance with our [Records Retention Policy](#).

You will be notified by the Legal team if you are required to retain documents that relate to an ongoing litigation, investigation or audit. Never dispose of information that is subject to a legal hold until the Legal team provides you with written authorization to do so. Records that have met preservation and legal hold requirements should be properly discarded.





# COMMUNICATE ABOUT OUR COMPANY

# RESPONSIBLY

Only individuals authorized in writing by Corporate Communications may communicate to the media or otherwise communicate publicly on behalf of Newell Brands. All requests for information about Newell Brands from the media should be forwarded to Corporate Communications. Requests from analysts and investors should be forwarded to Investor Relations. If you see social media content that you believe should be addressed by the Company, do not respond or address it yourself, rather send the relevant information to Corporate Communications.



## what if?

I received a call from a reporter asking me to comment on a project I'm working on. What should I do?

*You may know the project better than anyone else in our Company, but if you are not specifically authorized by Corporate Communications to speak to the media about the project, you should refer the reporter to Corporate Communications.*





# SAFEGUARD

## CONFIDENTIAL INFORMATION

Confidential information about our Company makes us who we are and drives our competitive advantage in the marketplace. Information is confidential if it is not generally known to the public, but you are exposed to it as part of your job. We count on you to protect our confidential information so that it is not used for improper purposes. Your obligation to protect Newell Brands' confidential information continues even if you leave our Company.

Safeguarding our Company's confidential information does not prevent you from providing information to government authorities regarding misconduct, participating in investigations, giving required testimony in proceedings regarding Newell Brands' conduct, or engaging in activities protected under the whistleblower statutes administered by any government agency.



## PROTECT OUR INTELLECTUAL PROPERTY



Preventing the unauthorized use of our intellectual property protects our market advantage and helps grow our brands and our reputation. To the extent permitted by law, all intellectual property conceived, created or made during the course of a Newell Brands employee's work belongs to our Company and should be disclosed to the Legal team before you share it with third parties. You must use Newell Brands' intellectual property in accordance with our Company's ownership rights.



# HOW CAN I PROTECT CONFIDENTIAL INFORMATION?

- Use it only as necessary to do your job.
- Information may be confidential even if it will later become public (e.g., financial results). Treat this information as confidential until authorized Company representatives have disclosed the information publicly.
- Share it only with Company employees who need to know it to do their jobs and third parties who have signed nondisclosure agreements or who are subject to professional duties of confidentiality (e.g., attorneys).
- Safeguard confidential documents, including in your office.
- Do not discuss Company business in public places where others can hear it.
- Do not view confidential information on your laptop in public places where others can see it.
- Only allow people with proper authorization into our facilities and contact local security if you notice unauthorized visitors.
- Ensure that employees return all confidential information if they leave our Company.





# PROTECT THE PRIVACY OF PERSONAL

# DATA

We believe that respecting the privacy of our employees, business partners and consumers builds trust and long-lasting relationships. As part of your job, you may handle the personal data of your colleagues, customers and consumers. Personal data is information that can be used to identify an individual directly or indirectly. Examples include: name, location, phone number, email address, photography, identification numbers, payment information and IP address. When we collect, access or handle the personal data of our employees or third parties, we must comply with all applicable data privacy laws and the Newell Brands [Global Data Privacy Policy](#).



## HOW CAN WE ENSURE WE COMPLY WITH DATA PRIVACY REGULATIONS?



- Do not collect more Personal Data than is needed.
- Use Personal Data for a specific purpose, and only for that purpose.
- Do not retain Personal Data longer than needed and delete it as soon as feasible.
- Limit access to Personal Data to only necessary individuals.
- Send Personal Data securely and never to a personally owned device.
- Only allow a third party to access Personal Data that belongs to our Company for purposes that directly support Newell Brands.
- Consult with the Legal team before transferring data outside of the country in which it is collected.



4.0

# WE COMMIT TO OUR MARKETPLACE

ENGAGE IN FAIR DEALING

ENSURE PRODUCT SAFETY

AVOID INSIDER TRADING

COMPLY WITH COMPETITION LAWS

NO BRIBERY

PREVENT MONEY LAUNDERING

COMPLY WITH TRADE COMPLIANCE LAWS



# ENGAGE

## IN FAIR DEALING

We believe that promoting positive business relationships rooted in truth and transparency build long-lasting relationships. Every employee must deal fairly and honestly with all third parties, including customers, competitors and suppliers.

- Make sure that you are accurate in promotional materials and can substantiate any claims that you make about our products.
- Buy and sell based on appropriate business considerations such as quality, price, service, reliability and ethical standards.
- Give potential suppliers and vendors equal consideration, treating them fairly and honestly.
- Gather competitive information legally, ethically and in a way that will not reflect badly on our Company. You may use information about our competitors that is in the public domain. However, never acquire information about other companies through improper means or enlist someone else to do so on your behalf.
- Ensure that you are not infringing upon the valid intellectual property rights of any third party, including our Company's competitors.



## what if?

**Is it okay to refer to documents I have from a previous employer?**

*It depends. If the documents contain confidential information, you cannot use or share them with Newell Brands. You must honor your confidentiality obligations, including any nondisclosure agreements, with your prior employers. If you have questions, ask the Legal team.*

**We recently hired a Marketing Director whose previous employer is a competitor of ours. During a team meeting, my colleague asked the new hire to disclose information from her previous employer's marketing plans. What should I do?**

*Speak up and tell your colleague that her request is improper. If you do not feel comfortable addressing your colleague, report the matter to your manager or Ethics & Compliance. Remember, we do not hire an employee of a competitor to obtain confidential information. Furthermore, we cannot ask colleagues to disclose confidential information about their former employers.*



# ENSURE PRODUCT



# SAFETY

Our consumers rely on us to make high-quality, safe products that consistently meet or exceed our Company's high standards. To maintain their trust, you must comply with applicable consumer laws, as well as our Company's policies addressing the safety and quality of our products.

We must promptly address issues with products that do not meet our high standards. If you have concerns about the quality or safety of our products, speak up and report them immediately. Similarly, if consumers express such concerns, forward them to the Legal team. If you are aware of a supplier not upholding a commitment to quality and safety, speak up and report it to our Corporate Social Responsibility team.





# AVOID

## INSIDER TRADING

We may have access to material non-public information about our Company or companies with which we do business. Material non-public information is information about a company that is not generally known to the public (“inside” information) and that a reasonable investor would consider relevant in making investment decisions. Insider trading occurs when someone uses inside information to gain profits or avoid losses in the stock market. Insider trading is illegal. To comply with the law, never buy or sell stock or other securities on the basis of inside information or provide “tips” based on inside information to others.

Inside information should be considered non-public until there is a formal press release, a published and publicly accessible earnings call or similar event or a document filed with the U.S. Securities and Exchange Commission (SEC) disclosing the information. Certain information filed with the SEC may not be public, so review our [policy](#) or contact the Legal team if you are uncertain.



## what if?

**I work for Newell Brands and my brother asked if he should buy our stock. Because of my position, I learned that we will announce a new acquisition which may increase the value of our stock. What should I do?**

*Do not share this “inside” information with your brother or provide him with a “tip” that would influence his decision to buy the stock. If you do, both of you would be breaking the law.*

## WHAT ARE EXAMPLES OF POTENTIAL “INSIDE” INFORMATION?

- Projected future earnings or losses
- Undisclosed financial results
- Planned mergers or acquisitions
- Sale of Company assets or subsidiaries
- Changes in dividend policy
- Changes in executive management
- Significant new product plans
- Impending bankruptcy or financial problems



# COMPLY

## WITH COMPETITION LAWS



We embrace a free marketplace where we compete vigorously and comply with competition and antitrust laws. Competition laws exist in virtually every country and cover many types of activities. The intended purpose of competition laws is to protect consumers and companies by preserving open competition. The penalties for violating these laws may include high fines, not being able to enforce commercial agreements and even imprisonment.



### TERMS OF SALE

You must not participate in agreements or policies that restrict our buyers' resale prices or terms and conditions of sale without legal advice. In countries where our Company has a particularly strong position, consult with the Legal team to ensure that actions related to pricing and selling are not in violation of competition laws.

### RELATIONSHIPS WITH COMPETITORS

- Do not discuss sensitive business information with competitors including: pricing, sales terms, marketing plans, trade programs, discounts, boycotts of third parties, or proprietary information.
- Do not come to an understanding with a competitor about any competitive matter, including refraining from competing in certain product or geographic markets.
- These types of discussions or agreements may give the appearance of cooperating with competitors instead of being independent.

**I attended a trade association meeting and during a break one of the participants wanted to compare the pricing and rebate programs that our companies offer customers. What should I do?**

*If this person is attending a trade association meeting with you, he is likely employed by a competitor. Advise him that you cannot discuss this information with him. You should never discuss pricing or price-related programs with competitors.*





# NO BRIBERY

We are committed to conducting business with integrity and do not tolerate any form of bribery or corruption. As a global company, we must comply with the laws of multiple countries as they relate to bribery of both private individuals and public/government officials. Many of these countries' laws, including the Foreign Corrupt Practices Act, apply to conduct both inside and outside of the respective country. Violations of anti-bribery laws can result in lawsuits, substantial fines and/or jail time for the Company and the employee.



## REMEMBER

- Never accept or provide anything of value in exchange for an improper advantage or to obtain/retain business.
- Regardless of local practice, make sure you avoid even the appearance of doing something improper to gain a business advantage.
- Be particularly cautious when dealing with government or public officials, officials of international organizations and political parties.
- Do not give anything of value to a government official or employee without obtaining prior authorization from Ethics & Compliance. The term "government official" should be applied broadly.
- Review our [Global Anti-Corruption Policy](#) to understand your responsibilities in complying with relevant regulations.





## → NO FACILITATION PAYMENTS

Our Company prohibits making facilitation payments. Facilitation payments are payments made to government officials in order to expedite official, routine government services.

If you need to make a payment in order to protect your personal safety, notify Ethics & Compliance as soon as possible and Global Security if it is safe to do so.



## → WE ARE ACCOUNTABLE FOR OUR THIRD PARTIES

We are responsible for third parties and other agents acting on our behalf. You must not knowingly allow a third party to engage in corrupt practices, including making improper payments on our Company's behalf. Additional information about when and how to conduct due diligence on third parties can be found in our [Global Anti-Corruption Policy](#).



**I have a shipment that must be delivered in a week, but was informed by the Customs office that it will take at least three weeks to process the paperwork. Our logistics vendor said that they can ensure delivery within a week. Can I use the vendor to handle the delivery?**

*Perhaps, but you must first ask the vendor questions related to the methods that they will use to have the paperwork processed more quickly. You should consult with Ethics & Compliance to confirm that you are asking our vendor all of the appropriate questions.*

**A Customs office outside of the U.S. is holding a large shipment of our products because there was an error in our paperwork. The Customs examiner asked our customs agent to pay a small cash "fine" in exchange for releasing the product. Can we permit our customs agent to make the payment?**

*No, you must obtain pre-approval from Ethics & Compliance. If it's not reviewed and documented properly, making a payment to a government official in exchange for the release of our products could be a violation of our Code and the law.*

# what if?



# PREVENT

## MONEY LAUNDERING

We abide by all laws designed to deter money laundering. Money laundering is the process by which funds generated through criminal activity (e.g., terrorism, drug trafficking) are moved through legitimate businesses in order to hide their criminal origin. Never knowingly facilitate money laundering and only conduct business with third parties after you have conducted appropriate due diligence.

Be aware of suspicious transactions:

- Payments in cash
- Requests to transfer funds to/from countries or entities that are not related to the transaction or customer
- Payment terms that are inconsistent with our Company's normal terms of business



## what if?

**A customer asked me to divide a \$10,000 transaction into four payments so that he can avoid having to complete paperwork required by the government. What should I do?**

*Advise the customer that you will not split the transaction because it is a violation of our Company's policy. The transaction must be processed for the total amount with all required paperwork submitted to the government. Also, report the request and any suspicious transactions to Ethics & Compliance.*





# COMPLY

## WITH TRADE COMPLIANCE LAWS



As a multi-national company, our transactions often involve moving products across national borders. Trade is heavily regulated, and many governments set rules and regulations to control importing, exporting, and related activities. We must comply with these laws and regulations that govern international trade. Violations of export and import laws can result in severe civil and criminal penalties for the company and its employees, including imprisonment.

- Export controls restrict or prohibit exports to certain countries, individuals, and entities.
- We are responsible for ensuring that, at a minimum, our transactions are compliant with U.S. sanctions laws.
- If you know or have reason to believe that a customer or business partner intends to improperly resell our products in another country, for example in a country that is subject to sanctions or to a third party that is targeted by sanctions measures, notify Ethics & Compliance.
- We are prohibited from participating in any international boycott that is not sanctioned by the U.S.
- Review the Newell Brands [International Trade Compliance Policy](#) for additional information on complying with anti-boycott and export regulations.



## what if?

**A third party asked me if he could distribute our products in Iran. The distributor is based in Iran and appears on the U.S. government Specially Designated Nationals list. Since the products are not manufactured in the U.S., I work outside of the U.S. and I am not a U.S. national, is it ok for me to sell our products to this distributor?**

*No. As a U.S. company, we must ensure that our transactions are compliant with U.S. sanctions laws, regardless of where an employee is located. If you have any questions, contact the Ethics & Compliance team.*



TABLE OF CONTENTS

We commit to doing THE RIGHT THING

We commit to EACH OTHER

We commit to our COMPANY

We commit to our MARKETPLACE

We commit to our COMMUNITY

RESOURCES



5.0

# WE COMMIT TO OUR COMMUNITY

PROTECT OUR RESOURCES

CONTRIBUTIONS





# PROTECT

## OUR RESOURCES



### → ENVIRONMENTAL REGULATIONS

Environmental laws protect people and the planet and aid in the preservation of valuable natural resources. Compliance with these regulations protect against harmful impacts to the communities in which we operate and reduces risks to the company and our employees. Violations of environmental laws may result in high fines, expensive and long-term remediation obligations, restrictions on our operations, injuries to people, and even imprisonment.

- Compliance with laws and regulations is the minimum standard.
- Comply with our corporate environmental standards, which are applicable to all of our operations and ensure uniform practices around the globe.
- If you are unsure about specific requirements, contact the Environmental Affairs team.



### SOURCE RESPONSIBLY ←

Our responsible sourcing program, which includes both social compliance and supply chain security, aims to increase transparency across our supply chain so we can ensure our customers and consumers receive high-quality and ethically produced or sourced products. Our [Vendor Code of Conduct](#) reflects our expectation that third parties adhere to our rigorous standards on human rights, individual workers' rights, and to all applicable laws. We comply with legislation focused on eliminating slavery and human trafficking from global supply chains. Our Company does not permit our business partners to use inhumane labor practices, including forced, compulsory and child labor or physical punishment.



# CONTRIBUTIONS

## CHARITABLE CONTRIBUTIONS

As a global company, we take seriously our responsibility to give back to the communities in which we operate. We are committed to making the world a better place and support nonprofit organizations whose missions align with our business, Values and philanthropic priorities.

- We are uniquely positioned to make a difference through in-kind donations of Newell Brands' product, particularly in response to natural disasters and other crises.
- We encourage employees to give back through volunteerism. Certain full-time employees receive paid time off to volunteer with eligible nonprofit organizations.
- Through the Newell Brands Charitable Foundation's Local Impact Grant Program, employees in select locations can nominate and vote on nonprofits to receive funding.
- Prior to committing to a financial or product donation on behalf of the Company, or using paid time off to volunteer, please review the Newell Brands [Philanthropy Policy](#) and follow the process required for review and approval.



## POLITICAL CONTRIBUTIONS



As a matter of policy, we do not use corporate funds to make contributions to support or oppose federal, state or local political parties, candidates, campaigns, ballot measures, political organizations, or social welfare organizations. Any contribution of Company funds or assets for these purposes requires approval by the Chief Executive Officer. For additional information, please review our [Government Affairs Policy](#).



ALWAYS REMEMBER

# WE EACH PLAY A PART

in following our Code and living our Values. These Values guide how we interact with our consumers, our customers, our shareholders, our communities and each other. Our Code can never cover every situation, but you can rely on several [additional resources](#) to help.

If you're faced with an ethical dilemma, start by asking yourself:

- Is it legal?
- Does it align with our Code of Conduct and other policies on the topic?
- Does it reflect our Values?
- Would you be comfortable if others knew about it?

If the answer to any of these questions is "no," don't move forward with the action. If you're still uncertain, you can speak with your manager, HR or a member of the Ethics & Compliance team. You can also contact the [Ethics Hotline](#) to raise a concern or request guidance. We will be prompt and thorough in our response.

Finally, we can't stress this point enough: We will never tolerate retaliation against anyone who raises a good-faith concern of a suspected violation of our Code of Conduct or the law.



# RESOURCES

If you have a question or concern, speak up by reaching out to your manager or any of the resources listed below.

RESOURCE	CONTACT INFORMATION
Ethics Hotline	ethics.newellbrands.com
Ethics & Compliance	ethics@newellco.com
Legal Team	legalservicesdepartment@newellco.com
Audit Committee	For reporting accounting, financial controls, or related issues, mail a sealed envelope marked "To Be Opened by the Audit Committee" to: 6655 Peachtree Dunwoody Road Atlanta, GA 30328 USA
Corporate Communications	media@newellco.com
Corporate Social Responsibility Team	sustainability@newellco.com
Environmental Affairs	environmental.compliance@newellco.com
Global Security	security@newellco.com
Human Resources	Contact Employee Relations
Investor Relations	investor.relations@newellco.com
Trade & Customs Team	RPS@newellco.com

