

# Modern Slavery and Supply Chain Transparency Statement (2024)

# Introduction

At Newell Brands,<sup>1</sup> our iconic products vary across a wide range of categories, and we recognize the importance of supporting human rights and improving working conditions for the workers who make them. Our values of leadership, passion for winning, integrity, ownership and teamwork remain consistent with our efforts to prevent modern slavery, forced labor, child labor and human trafficking in our global supply chain.

We proudly reaffirm our work in this important area by publishing this statement, which is made in accordance with the California Transparency in Supply Chains Act, the UK Modern Slavery Act,<sup>2</sup> the Australian Modern Slavery Act<sup>3</sup> and the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act.<sup>4</sup>

**To learn more about our operating segments, review our [2024 Annual Report on Form 10-K](#).**

## Our Business

Newell is a leading consumer goods company with a strong portfolio of well-known brands such as Sharpie, Graco, Oster, Yankee Candle, Rubbermaid and Coleman. Headquartered in the United States, we have nearly 24,000 talented employees around the world, and we are organized into three unique operating segments: Learning & Development, Home & Commercial and Outdoor & Recreation.

We proudly sell our products in over 150 countries across the globe and have operations on the ground in over 40 of those countries. We manufacture many of our products in the United States and elsewhere, and we also partner with third parties who manufacture products on our behalf or supply materials to produce our products. Of our total employees, approximately 14,000 of our employees are in manufacturing and supply chain roles. In addition, third-party facilities that manufacture our products or supply materials collectively employ thousands of workers worldwide.

<sup>1</sup> Newell Brands (or "Newell") is a global company. All references to Newell include Newell Brands Inc., and its subsidiaries worldwide. We present this single statement to reflect our goal of managing fundamental human rights and decent working conditions in a consistent, integrated manner across our global operations. However, not all Newell entities are subject to the Acts mentioned above. To the extent applicable, we may include additional disclosures specific to the entities required to prepare a statement under one or more of the Acts referenced.

<sup>2</sup> In the United Kingdom, reporting entities include Newell Brands UK Limited, Mapa Spontex UK Limited, Newell Rubbermaid UK Services Limited and Yankee Candle Company (Europe) Limited, which are subsidiaries of Newell.

<sup>3</sup> In the Australia-New Zealand region, reporting entities include Newell Australia Pty Limited, the Australian operating entity of Newell, and Sistema Plastics Limited and Newell New Zealand Limited, all of which are subsidiaries of Newell.

<sup>4</sup> In Canada, reporting entities include Yankee Candle Canada, Inc., and Newell Brands Canada ULC, which are subsidiaries of Newell.

We never take lightly the vast responsibility that accompanies our success as an organization, and we believe that, under no circumstance, is it acceptable for anyone to be subjected to any form of modern slavery. It is because of these strong beliefs that we continuously aim to create transparency across our supply chain to ensure that our retail customers and consumers receive ethically produced and sourced products.

## Newell at a Glance\*



\*Data represents a 12-month period ending December 31, 2024.

# Our Supply Chain

The significant breadth of our products and the global reach of our business means that Newell operates a complex supply chain consisting of sourcing finished goods, raw materials, components and services from over 18,000 suppliers in over 90 countries. Since our suppliers range from large multinational companies to small and medium-sized businesses, we tailor our procurement process to leverage the expertise and relative scale of our suppliers.

Newell's global supplier network undergoes ongoing reviews conducted by our Responsible Sourcing Team as part of the execution of a global monitoring plan related to social compliance and supply chain security audits through our Responsible Sourcing Program. This program aims to create transparency across our supply chain and to align our actions and those of our suppliers with our goal of producing and sourcing products in an ethical and responsible manner.



## Our Policies

Through our policies, such as our [Code of Conduct](#), [Vendor Code of Conduct](#) and [Responsible Sourcing Manual](#), we express our dedication to maintaining our values and supporting our rigorous efforts to prevent modern slavery in our supply chain.

### Code of Conduct

Our Code of Conduct, which was recently refreshed, guides our employees in making the right decisions in every aspect of our global business. Our Code is available in 12 languages and outlines our demanding standards, including those on human rights and individual workers' rights. It specifically prohibits "the use of child labor, forced labor or physical punishment" in any aspect of our business and also outlines our efforts to:

- **Follow applicable wage and hour laws, including minimum wage, overtime and maximum hour laws**
- **Respect our employees' rights to lawful freedom of association and recognize their right to collective bargaining**
- **Support equal opportunity for all employees**

Employees receive a copy of the Code of Conduct when they join Newell and agree in writing to comply with it. In addition, for the second year in a row, we proudly reported a 100 percent completion rate for employees assigned to complete mandatory Code of Conduct training.

## Vendor Code of Conduct

As further assurance that our suppliers are aligned with our goals of preventing modern slavery and adhering to the highest ethical business conduct, we publish our Vendor Code of Conduct. Available in multiple languages, it requires our suppliers to demonstrate that they provide safe working conditions, treat workers with dignity and respect, act ethically and comply with all relevant human rights and labor laws. Specifically, our Vendor Code of Conduct requires vendors to “maintain a work environment that is free from any forced labor, prison labor, or human trafficking” including child labor or any non-voluntary employment. In addition, we require our direct and sourced finished goods suppliers to attest to our Vendor Code of Conduct on an annual basis or when we make updates to the Code. Serious violations may lead to the termination of the business relationship.

## Leadership Engagement

Newell takes human rights and responsible sourcing practices seriously and we expect each of our suppliers to maintain a similar position. As such, certain violations such as allegations of bribery, child labor, forced or prison labor, cross-border smuggling, or falsifying documents are escalated to a committee of Newell Brands executives that includes our Chief Procurement Officer, Vice President of Enterprise Procurement and Responsible Sourcing, Chief Ethics and Compliance Officer, Chief Legal and Administrative Officer, and other segment leadership, as appropriate. Relying on subject matter experts and working to ensure alignment with our values, these leaders make a collective determination on the most expedient and impactful way to address the issues brought before them. This may include the loss of business for the supplier or the termination of our business relationship. Suppliers are expected to have effective systems in place to manage social compliance actively within their operations and to ensure that all offenses are promptly and effectively addressed.

## Our Assessment of Risk

We recognize that demonstrating our support of human rights and eliminating modern trafficking in our supply chain involves mitigating risk through a highly integrated and holistic approach. This includes clearly established standards, oversight and quality controls within our sourcing process and business operations. Our work in this area is illustrated through our goal of identifying and addressing potential modern slavery risks, which includes:

- **Strong policies prohibiting modern slavery at every level of our supply chain**
- **Identification and assessment of risks**
- **Design and implementation of actions and strategies to respond to identified risks**
- **Ongoing assessments, monitoring and audits**
- **Analytics and reporting to enable continuous improvement**

To learn more, view our Vendor Code of Conduct which outlines how we ensure supplier issues are addressed promptly and effectively.



## Due Diligence

Newell Brands has developed a detailed process to evaluate whether a new supplier's capabilities, principles, and values are consistent with ours, including whether a supplier is equally committed to supporting human rights for all workers. This begins with the initial selection process for our suppliers, which integrates social compliance standards with the supplier pre-qualification and approval process. Due diligence for new suppliers includes:

- **Capabilities assessment**
- **Financial verification**
- **Vendor Code of Conduct audits**
- **Written agreement to abide by our Vendor Code of Conduct**

Approved suppliers undergo regular assessments to ensure continuous adherence to our standards, including the requirement that supplier operations be void of any human rights violations such as modern slavery. Our process of conducting periodic announced and unannounced assessments of our suppliers is designed to verify compliance with Newell's Vendor Code of Conduct. These assessments are conducted by our Corporate Social Responsibility Team or a third party. Newell also has an established escalation process for suppliers that fail to improve their performance in accordance with an action plan or that commit serious violations of Newell's Vendor Code of Conduct.

We continue to evolve our due diligence practices by monitoring and following industry best practices and audit processes, leveraging industry-wide available resources and, where appropriate, participating in the development and improvement of industry standards. By continuing to leverage our membership in multi-stakeholder initiatives like SEDEX (Supplier Ethical Data Exchange) and SCAN (Supply Chain Audit Network), we have improved the depth and breadth of our audits, enabling more effective assessments of social compliance and supply chain security. This allows us to focus on high-priority risks while maintaining robust oversight.





## Risk Assessment

In 2024, we continued the ongoing process of understanding risks of forced labor in our supply chain beyond top tier suppliers by engaging a trusted third party to conduct and review supplier risk assessments. We also distributed requests for information within Newell's suppliers' sub-tiers. This work resulted in mapping out Newell's supply chain to identify and mitigate the potential for forced labor. As a result, we identified and evaluated high-risk product lines, including cotton and small electrical appliances and high-risk commodities such as latex and rubber down to the farm and plantation levels where the raw materials are cultivated. This led to our increasing traceability assessments along with further engagement with external organizations and suppliers to ensure fair labor practices and safe working conditions through our supply chain. Specifically, in 2024, an additional twelve suppliers participated in traceability assessments. We continue to review technologies and conduct benchmark studies with our retail customers and peer companies to identify additional steps we can take to mitigate any risks of forced labor use.

Newell's program is built upon a continuous improvement platform that utilizes the audit as a starting point for driving long-term sustainable improvements with suppliers. We use internal and external auditors to ensure credibility in our process. Newell makes every reasonable effort to conduct ongoing due diligence of suppliers and has activity touchpoints through auditing, training and customer programs. We have a robust escalation process in place for high-risk violations to ensure full resolution of any issues.



## Our Efforts to Address Risk

Internally and through our Responsible Sourcing Team's work with our suppliers, we take steps to build capacity to address risk by creating systematic change and engaging in continuous improvement efforts. One way we mitigate the risks of modern slavery arising in our supply chain is by implementing a Management Action Plan (MAP) with our highest risk suppliers and through conducting escalated monitoring and tracking of performance. MAP is a process that includes an in-depth review of the root cause of failures and intensive corrective programs to help suppliers improve their operations. Creating a MAP allows us to work with suppliers to ensure they can establish a proactive culture around human rights and social compliance. In 2024, we completed five MAPs, returning those suppliers to good standing.

## Reporting Concerns

Newell encourages workers, retail customers and business partners to report any concerns related to our direct activities or our supply chain, including activities that may relate to an increased risk of modern slavery or human trafficking. Newell's [Speak Up and Anti-Retaliation Policy](#) is designed to make it easy for anyone, including workers, to contact us through the company's [Ethics Hotline](#).

The Ethics Hotline is a safe way to raise concerns about potentially unethical conduct without fear of retaliation. It is hosted and operated by an independent third-party provider with leadership engagement through oversight by our Chief Ethics and Compliance Officer and regular updates to our Board. Hotline reports can be made by phone or via the internet. Reports are accepted in over 100 languages and can also be made anonymously. Newell employees are also encouraged to report unethical or illegal conduct, including human rights concerns, to our leaders, such as our Vice President of Global Sourcing, our Chief Ethics and Compliance Officer or the Responsible Sourcing or Legal Teams. In 2024, investigators received training on best practices to use when conducting investigations, including how to escalate and resolve serious concerns such as human trafficking or forced labor. Newell's Global Ethics and Compliance team addresses reports promptly, discreetly, and confidentially, and is experienced in addressing calls related to potential human rights and modern slavery issues.



## Training

In 2024, we conducted more than ten comprehensive training sessions, virtually and in person, aimed at strengthening supplier awareness and compliance. Through these sessions, we successfully trained more than 788 supplier personnel across various critical areas, including:

- **Identification and prevention of forced labor**
- **Child labor risk mitigation strategies**
- **Updates to the Vendor Code of Conduct**
- **Key regulatory changes and compliance requirements**
- **Ethical business practices and corporate compliance**
- **Supply chain security and risk management**
- **Escalating concerns**

These training initiatives were designed to enhance supplier capacity, reinforce accountability, and ensure alignment with evolving global regulatory and ethical standards. We continue to invest in education and engagement which remain a cornerstone of our responsible sourcing strategy.

**As part of our long-term strategy, we continue to invest in human rights training and awareness globally.**





We believe frequent and ongoing training and awareness on how to identify, prevent and mitigate the risk of modern slavery is an essential component of our overall efforts to help eradicate human rights violations in our supply chain. This work starts within, so we provide Newell employees who are tasked with social compliance and other employees with direct responsibility for supply chain management with relevant training on human trafficking and modern slavery. During sessions, employees are exposed to our “tone at the top” approach, where leaders engage in our global efforts to eliminate modern slavery from our supply chain.

In addition to training Newell employees, we provide regular ongoing training to our finished goods suppliers around key human rights topics. In 2024, representatives from over 250 suppliers attended our annual Responsible Sourcing Summit and received guidance on preventing human trafficking along with information about Newell’s expectations for supporting risk mitigation, continuous improvement and overall supplier development. Attendees also received presentations by leaders in Responsible Sourcing and Supply Chain and, for the first time ever, our Chief Ethics and Compliance Officer partnered with local team members in Asia to provide live in-person customized training on ethical decision making and methods to escalate concerns. The training included role-play activities involving members of Newell’s local leadership team and provided opportunities for question-and-answer sessions. As part of our long-term strategy, we continue to invest in standards for supporting human rights globally.

## Assessing Effectiveness

Assessing the effectiveness of our modern slavery prevention efforts allows us to understand the greatest risks and focus our efforts where they are most impactful. This also helps us understand and continuously improve the way in which we identify and address relevant risks, including the risk of modern slavery.

Key measures we use to assess our approach include:

- **Auditing Suppliers:** In 2024, we conducted 391 social compliance audits and 169 supply chain security audits for a total of 560 audits. We closed out 484 corrective action plans with suppliers for issues identified in the audits. In further response to audit outcomes, we trained over 700 supplier personnel on the elimination and identification of forced labor.
- **Monitoring Activity:** Through our robust and proactive monitoring plan, we did not identify any instances of forced labor or human trafficking within our supply chain.

In addition to these measures, we also review the effectiveness of our efforts by assessing our suppliers’ abilities to detect and mitigate modern slavery risks along with their response to such concerns, including remediation efforts. To the extent we have discovered that our efforts to prevent or remediate child labor or forced labor have resulted in the loss of income to our workers’ families in any identifiable way, we have taken appropriate measures to address such impact to remediate the loss of income. We realize that modern slavery is a complex issue that requires dedication and effort to eradicate, and we continuously work internally as a company and with our suppliers to identify additional ways to assess the effectiveness of our actions.

# Our Progress and Ongoing Focus

Newell is working to continuously improve the effectiveness of our efforts to eliminate modern slavery from our supply chain and to support human rights globally. We look to consistently deliver progress and expand our work to identify and address any modern slavery risks that may arise in our business. Newell recently published the [2024 Corporate Citizenship Report](#), which outlines the ways in which we focus on consumers, ethical operations, employee safety and wellbeing, suppliers, community impact and highlights our aim to create lasting value for all our stakeholders. The performance indicators on modern slavery prevention are encompassed in the “Responsible Sourcing & Social Compliance” section of the report.

Examples of progress made in 2024 include the following:

- **Hosting our Responsible Sourcing Supplier Summit**
- **Presenting Supplier Builder and Fire Safety Training**
- **Refreshing our Vendor Code of Conduct**
- **Upgrading our participation with SEDEX to an A/B membership**
- **Achieving 98% closure on 484 corrective action plans for any opportunities that presented themselves in our suppliers’ operations**
- **Completing 560 audits through our Responsible Sourcing Program to assess suppliers on multiple issues including human rights**

We work to prevent modern slavery on an ongoing basis by continuing to:

- **Complete the Supply Chain mapping process to identify potential areas of risk across Newell**
- **Stay abreast of information on global risk related to slavery and human trafficking**
- **Incorporate supplier performance, including human rights support, in our identification of strategic suppliers**
- **Strengthen contracts with suppliers, implement additional measures of self-certification, and provide other support to ensure our suppliers have additional resources and capabilities to address modern slavery concerns**
- **Identify and implement ways to improve employee and supplier awareness of Newell’s focus on respecting human rights and efforts to prevent modern slavery and human trafficking within our supply chain**

In 2025 and beyond, Newell is working to support human rights and improve working conditions for the workers who produce our goods across the globe.



**As a global leader in consumer goods, we recognize our responsibility to ensure that our products are produced in alignment with our values and ethical standards.**

# Consultation and Approvals

This statement describes Newell's and its subsidiaries' actions on modern slavery for the calendar year 2024. It was produced in consultation with our subsidiaries to identify and assess modern slavery risks, exchange meaningful dialogue and ensure accountability through involvement from the following global departments within Newell:

- **Corporate Communications**
- **Ethics and Compliance**
- **Global Supply Chain**
- **Human Resources**
- **Legal Services**
- **Procurement**
- **Responsible Sourcing**
- **Supply Chain**

**Approved by the Board of Directors on May 8, 2025**



**Bridget Ryan Berman**  
Chair, Board of Directors  
Newell Brands Inc.

**This Report was approved by the Board of Directors of Yankee Candle Canada Inc. and Newell Brands Canada ULC pursuant to section 11(4)(b)(i) of the Act.**

Dated: May 8, 2025



**Brian J. Decker, Director**

I have the authority to bind Yankee Candle Canada Inc. and Newell Brands Canada ULC.

