PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT COMMUNICATION/ATTORNEY WORK PRODUCT
DRAFT FOR DISCUSSION PURPOSES ONLY
DRAFT DATED June 8, 2022

Newell Brands Inc.

Responsible Chemical Management Policy

Newell Brands Inc. is aware of the potential impact of chemicals used in our operations and in our products throughout their life cycle, from design and sourcing to manufacturing, packaging, distribution and end-of-life. Embedded in Newell Brands' four corporate citizenship focus areas—products, people, planet and communities—is a commitment to responsible chemical management. (For more information on these four corporate citizenship focus areas, please visit Newell Brands' Corporate Citizenship Report.)

Responsible Chemical Management Policy Requirements

Our responsible chemical management policy requires the following:

- As a baseline, compliance with all applicable chemical laws and regulations globally, including those governing chemical use, registration, labeling, restriction and disposal
- Design and implementation of restricted substances protocols and processes at the business unit level, using requirements specifically tailored to the business' product portfolio
- Integration of responsible chemical management practices in our Corporate Environmental Compliance and Safety Excellence and Leadership (SEAL) programs, including implementation of written procedures and training programs for company facilities on chemical transportation, handling, usage, storage, emergency response and ultimate disposition
- Maintaining robust compliance assurance practices for operational and product compliance, which may include supplier certifications, full substance disclosures, ingredient and/or product testing and facility self-assessments and audits
- Implementation of circular design principles and sustainable packaging practices to reduce pollution and waste
- Continual exploration of opportunities to exceed compliance, in alignment with the needs and desires of our consumers and our communities, such as proactively reducing, substituting or removing chemicals in or from products, packaging and/or operations

Policy Development and Processes

In addition to integrating responsible chemical management practices in our daily operations, our Product Safety and Regulatory Committee, comprised of representatives from all business units and corporate compliance functions, meets periodically to share updates and best practices and discuss opportunities for continuous improvement and future chemical policy goals.