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UK MODERN SLAVERY ACT STATEMENT

DATE: May 16, 2023

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Newell Brands, Inc. and its subsidiaries ("Newell") have taken, and are continuing to take, to ensure that modern slavery, forced labor or human trafficking are not taking place within Newell's business or supply chain.

Newell is a leading global consumer goods company. Newell rigorously applies high standards of corporate governance and ethics to its business and emphasizes transparency and accountability.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Newell has a zero-tolerance approach to modern slavery, and is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in any of its supply chains.

Organizational structure and business

Newell has its headquarters in the US and is recognized as a leading global consumer goods company with a strong portfolio of well-known brands, including Paper Mate®, Sharpie®, Dymo®, EXPO®, Parker®, Elmer's®, Coleman®, Marmot®, Oster®, Sunbeam®, FoodSaver®, Mr. Coffee®, Rubbermaid® Commercial Products, Graco®, Baby Jogger®, NUK®, Calphalon®, Rubbermaid®, Contigo®, and Yankee Candle®.

Newell sells its products in nearly 200 countries around the world, with operations on the ground in over 40 of these countries, including in the North America, Latin America, Europe, Middle East, Africa and Asia-Pacific regions.

Newell is organized into the following 3 operating segments: Learning & Development (covering the Writing and Baby sub-segments), Home & Commercial (covering the Commercial, Food, Home Fragrance and Home Appliances sub-segments) and Outdoor & Recreation. This statement has been approved by the Newell Board of Directors on

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the date set out at the top of this statement and also applies to all subsidiaries of Newell (as at the date of this statement) which meet the criteria set forth in the Modern Slavery Act 2015.

Relevant policies and tools

Newell utilizes the following policies and procedural documents that describe the company's approach around human rights, responsible sourcing and ethical standards including the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in Newell's operations:

- Code of Conduct
- Vendor Code of Conduct
- Supplier Business Ethics guidelines
- Global Procurement Policy
- Responsible Sourcing Manual

Newell's Code of Conduct is key to the company's continued growth and reflects a commitment by every employee to an ethical workplace. Newell's Code makes clear to employees the actions and behavior expected of them when representing Newell. Newell strives to maintain the highest standards of employee conduct and ethical behavior when operating abroad and managing its supply chain.

Specifically, Section 2.3 of Newell's Code of Conduct states:

"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"

Additionally, Section 5.2 of Newell's Code of Conduct states:

"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

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from global supply chains, including the UK Modern Slavery Act and California Transparency in Supply Chain Act. Our Company does not permit our business partners to use inhumane labor practices, including forced, compulsory and child labor or physical punishment.”

Newell uses only specified, reputable employment agencies to source labor and verifies the practices of any new agency before accepting workers from that agency.

Newell is committed to ensuring that its suppliers adhere to the highest standards of ethics. Supplier requirements are outlined within both Newell’s Code of Conduct and Vendor Code of Conduct. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labor. Newell works with suppliers to ensure that they meet the standards of Newell’s Vendor Code of Conduct and improve their worker’s working conditions. Each supplier is required to acknowledge and agree to Newell’s Vendor Code of Conduct and serious violations of Newell’s Vendor Code of Conduct may lead to the termination of the business relationship. Specifically, the Vendor Code of Conduct states:

“Vendors shall not use any prison, indentured, bonded or forced labor. No employees shall be forced to remain employed other than on a voluntary basis. Foreign employees must be employed in full compliance with the labor and employment laws of the host country. The contract terms under which such employees are employed must be in writing, in a language that the employees can read and understand, and accepted by the employees prior to their departure from their home countries. Supplier must not withhold the passports and visas of foreign employees. Vendor shall maintain and commit to maintaining a work environment that is free from human trafficking. Employment practices must not include the recruitment, transportation, transfer, harboring or receipt of persons, or through the use of force or through other forms of coercion, abduction, fraud, deception, abuse of power or by giving or receiving payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.”

Newell encourages all its workers, customers and other business partners to report any concerns related to Newell’s direct activities or its supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Newell’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can confidentially contact the company’s Ethics Hotline.

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Risk assessment and due diligence

The greatest potential risk of slavery and human trafficking can exist in supply chains. Newell believes that the risk of slavery and human trafficking is mitigated by clearly established standards, oversight and quality controls within Newell's sourcing process, social compliance verification process and business operations.

Newell conducts due diligence when considering engaging new suppliers and regularly reviews its existing suppliers. Newell's due diligence and reviews include: capabilities assessment, financial verification, Vendor Code of Conduct Audits, and Newell's Vendor Code of Conduct review prior to commencing business with a supplier. For existing suppliers, annual Vendor Code of Conduct confirmation and social compliance trainings including developing corrective action plans are completed. Newell has an established escalation process for suppliers that fail to improve their performance in accordance with an action plan or seriously violate Newell's Vendor Code of Conduct.

Newell's Corporate Social Responsibility team works closely with the business units and its suppliers to ensure they establish a proactive culture around human rights. Newell's Responsible Sourcing Manual is a resource provided to suppliers to ensure they fully understand the social compliance requirements and to assist them with proactively managing human rights within their factories.

In 2022, Newell commenced the process of understanding risks of forced labor use in its supply chains beyond top tier suppliers by engaging KPMG to conduct and review supplier risk assessments and sending out requests for information within Newell's suppliers' sub-tiers. This is only the first step in mapping out Newell's supply chain to mitigate the risk of potential force labor being used to manufacture Newell products. Newell is reviewing technologies and conducting benchmark studies with its retail customers and peer companies to identify additional steps it can take to mitigate any risks of forced labor use. Our goal is to have this task completed by the end of 2024.

For more information on Newell's Corporate Social Responsibility program, please review Newell's Vendor Code of Conduct and Responsible Sourcing Manual at <https://www.newellbrands.com/ethics-compliance>.

Corporate Citizenship Report, Newell's Progress and Performance Indicators

Newell's commitment to addressing modern slavery issues in its supply chain forms part of its wider commitment to Corporate Citizenship. Newell recently published its 2022 Corporate Citizenship Report which can be found at

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<https://www.newellbrands.com/corporate-citizenship/>. This report covers Newell's progress around its Corporate Citizenship philosophies and its progress and performance indicators on modern slavery are encompassed in the "Ethics and Compliance" and "Responsible Sourcing" sections of the Corporate Citizenship Report. Newell's Corporate Citizenship philosophies direct its efforts to be a force for good and demonstrate the tangible ways it is making a difference.

Board Approval

This statement has been approved by Newell's Board of Directors, who will review the statement and applicable updates annually.

Sincerely,



19 May 2023 5:03:41 PM EDT
Robert Steele
Board Chair