



# Modern Slavery and Supply Chain Transparency Statement (2023)

## Introduction

Newell<sup>1</sup> is committed to supporting human rights and improving working conditions for the workers who make our products. Although the products we make are uniquely diverse and vary across a wide range, our values of integrity, teamwork, passion for winning, leadership and ownership remain consistent with our commitment to preventing modern slavery, forced labor, child labor and human trafficking in our global supply chain.

This statement 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>.

## 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 25,000 talented employees around the world and we are organized into three unique operating segments: Learning & Development, Home & Commercial and Outdoor & Recreation.

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*To learn more about our operating segments, review our [2023 Annual Report on Form 10-K](#).*

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We proudly sell our products in over 150 countries across the globe, and we operate in over 40 of those countries. We manufacture many of our products, and we also partner with third parties who manufacture products on our behalf or supply materials for the production of our products. Over 15,000 of our employees are in manufacturing or distribution. In addition, third-party facilities that manufacture our products or supply materials collectively employ more than one million individuals worldwide. This all leads to our understanding of 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 customers and consumers receive ethically produced and sourced products.

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<sup>1</sup> Newell is a global company. All references to Newell include Newell Brands Inc., and its subsidiaries worldwide.

<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.



## Newell at a Glance

NET SALES

**\$8.1**  
BILLION

TOTAL EMPLOYEES

**~25K**  


PRODUCTS SOLD  
IN OVER  
**150**  
COUNTRIES

BRANDS  
**60**  


SUPPLY CHAIN & DISTRIBUTION EMPLOYEES  
**~15K**

OPERATE IN OVER  
**40**  
COUNTRIES AROUND THE GLOBE  


NEWELL-OWNED MANUFACTURING SITES  
**46**  
NEWELL-OWNED MANUFACTURING  
IN **19** COUNTRIES

MANUFACTURING & SOURCING  
IN  
**56**  
COUNTRIES  


## Our Supply Chain

Due to the breadth of our products and the global reach of our business, Newell operates a complex supply chain, sourcing finished goods, raw materials, components and services from over 20,000 suppliers in 77 countries. Our suppliers range from large multinational companies to small and medium-sized businesses, which allows us to 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 ensure our customers and consumers receive products that are produced and sourced in an ethical manner.



## Our Policies

Our policies express our dedication to maintaining our values and support our rigorous efforts to prevent modern slavery in our supply chain. These include our [Code of Conduct](#), [Vendor Code of Conduct](#) and [Responsible Sourcing Manual](#).

**Code of Conduct.** Our [Code of Conduct](#), which guides our employees in making the right decisions in every aspect of our global business, reflects our commitment to an ethical and safe workplace and outlines our demanding standards on human rights and individual workers’ rights. Specifically, our Code of Conduct, which is available in twelve languages, prohibits “the use of child labor, forced labor or physical punishment” in any aspect of our business. In our Code, we also commit 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 and
- 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, employees receive refreshed Code of Conduct training annually.

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*Our [Vendor Code of Conduct](#) reflects our expectation that third parties adhere to our rigorous standards on human rights. Each supplier must acknowledge it and agree to follow the requirements in our Code.*

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**Vendor Code of Conduct.** As further assurance that our suppliers share our commitment to preventing modern slavery and adhering to the highest ethical business conduct, we publish and regularly update 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 reflects our expectation that third parties adhere to our rigorous standards on human rights, individual workers’ rights and all applicable laws. Our Company does not permit our business partners to use inhumane labor practices, including forced, compulsory and child labor or physical punishment.”

Each supplier is required to acknowledge and agree to follow our Vendor Code of Conduct. Serious violations may lead to the termination of the business relationship.

## Zero Tolerance Policy

Newell takes human rights and responsible sourcing practices seriously and we expect each of our suppliers to maintain a similar commitment. As such, there are certain violations that Newell deems as “zero-tolerance” offenses. Examples of zero-tolerance offenses include bribery, child labor, forced or prison labor, cross-border smuggling and falsifying documents.



If these types of offenses are identified, our Responsible Sourcing Team launches an investigation. If a zero-tolerance offense is validated, it is escalated to our Zero Tolerance Committee, which is comprised of Newell executives, including our Chief Procurement Officer, Vice President of Enterprise Procurement and Responsible Sourcing, Chief Ethics and Compliance Officer, Chief Legal and Administrative Officer, and other appropriate segment leadership (as required). The Committee makes a collective determination on the most expedient and impactful way to address the issue, which can result in the loss of business for the supplier and 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 zero-tolerance offenses are promptly and effectively addressed.

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*To learn more about our Zero-Tolerance Policy, view our [Vendor Code of Conduct](#) which outlines how we ensure supplier issues are addressed promptly and effectively.*

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## **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 starts with our commitment to identify and address 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 and
- Analytics and reporting to enable continuous improvement.

## **Due Diligence**

Newell 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 and
- Written agreement to abide by our Vendor Code of Conduct.

Approved suppliers undergo regular assessments to ensure continuous adherence to our standards, including our requirement that supplier operations be void of any human rights violation, including modern slavery. Through this process, we conduct periodic announced and unannounced assessments of our suppliers designed to verify their 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 seriously violate Newell's Vendor Code of Conduct.

We are evolving 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. For example, instead of requiring suppliers to respond to repeated questionnaires and audit requests, we are coordinating with industry organizations that conduct standardized audits that many customers can access, saving time and resources and reducing audit fatigue.

### **Risk Assessment**

In 2023, we continued the process of understanding risks of forced labor use in our supply chain beyond top tier suppliers by engaging a trusted third party to conduct and review supplier risk assessments and through distributing requests for information within Newell's suppliers' sub-tiers. This work resulted in mapping out Newell's supply chain to mitigate the potential for forced labor. We evaluated high-risk product lines, including cotton, down to the farm level where the cotton is cultivated. In 2023, ten suppliers participated in our pilot assessment. 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. Our goal is to have our assessment completed by the end of 2024.

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 in which 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 vendors 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 2023, we completed four MAPs, returning those challenged suppliers to good standing. We also returned to in-person supplier training for the first time in three years.

### **Reporting Concerns**

Newell encourages workers, 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 oversight by our Board and our Executive Committee. Reports can be made by phone or via a written report on the provider’s website. Reports are accepted in over 100 languages and can also be made anonymously. 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. Investigators receive relevant training on best practices to use when conducting investigations. 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**

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 are aware of and engage in our global efforts to eliminate modern slavery from our supply chain.

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

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In addition to training Newell employees, we provide regular ongoing training to our finished goods suppliers around key human rights topics. In 2023, over 350 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, Supply Chain and Ethics and Compliance. As part of our long-term strategy, we are committed to continuing to invest in training and awareness of our 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:

- The number of suppliers screened on human rights





- The number of Corrective Action Plans implemented and resolved related to human rights issues
- The number of employees that have completed training and other capacity-building activity relevant to our Code of Conduct, human rights and modern slavery and
- The number of reports received related to human rights issues, specifically, modern slavery and our handling of those reports.

In addition to these measures, we also review the effectiveness of our efforts by assessing our suppliers' ability 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 will 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 Commitment

*Our Corporate Citizenship Report outlines the philosophies that direct the actions we take to be a force for good.*

Newell is committed to continuously improving 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. As part of our commitment to corporate citizenship, Newell recently published its [2023 Corporate Citizenship Report](#), which outlines our corporate citizenship goals and demonstrates the tangible ways in which we are making a difference in our communities locally and globally. The performance indicators on modern slavery prevention are encompassed in the “Ethics & Compliance” and “Responsible Sourcing and Social Compliance” sections of the report.

Examples of progress made in 2023 include the following:

- Hosted our Responsible Sourcing Supplier Summit
- Presented Supplier Builder and Fire Safety Training
- Refreshed our Vendor Code of Conduct
- Upgraded our participation with SEDEX to an A/B membership
- Achieved 98% corrective action plan closure for any opportunities that presented themselves in our suppliers' operations and
- Audited and reviewed 637 factories through our Responsible Sourcing Program to assess suppliers on multiple issues including human rights.



We commit to our work on preventing modern slavery on an ongoing basis by continuing to:

- Complete the Supply Chain mapping process to identify potential areas of risk across Newell
- 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
- 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 and
- Identify and implement ways to improve employee and supplier awareness of Newell's commitment to respect human rights and efforts to prevent modern slavery and human trafficking within our supply chain.

In 2024 and beyond, Newell is committed to supporting human rights and improving working conditions for the workers who produce our goods across the globe.

## Consultation and Approvals

This statement describes Newell's and its subsidiaries actions on modern slavery for the calendar year 2023. 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 departments within Newell:

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

**Approved by the Board of Directors on May 9, 2024**

*Bridget Ryan Berman*

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