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AUSTRALIAN MODERN SLAVERY ACT STATEMENT

Introduction

This is a joint statement is made pursuant to the Modern Slavery Act 2018 (Cth) and sets out the steps that Newell Australia Pty Limited (ACN 075 071 233) ("Newell Australia") and its wholly owned subsidiaries Sunbeam ANZ Holdings Pty Ltd (ACN 612 931 316) ("Sunbeam Holdings") and Sunbeam Corporation Pty Ltd (ACN 000 006 771) ("Sunbeam Corp") and Coleman Brands Pty Limited (ACN 091 681 195) ("Coleman") (together, "Newell" or "the Company") have taken for the financial year ending 31 December 2020 and are continuing to take to combat any modern slavery, forced labor or human trafficking within Newell's business, operations or supply chains.

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 encompasses slavery, servitude, human trafficking and forced labor. Newell maintains a zero-tolerance stance on these issues. Newell is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery, forced labor and human trafficking.

Organizational structure and business

Newell Australia is the Australian arm of its ultimate holding company, Newell Brands Inc. which is headquartered in the US. Newell also operates in Australia through its other Australian subsidiaries Coleman, Sunbeam Holdings and Sunbeam Corp. Sistema Plastics Australia Ltd is also part of the broader Newell Brands Inc. group.



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®, First Alert®, Sistema®, 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 8 business units: Home Fragrance; Baby; Writing; Food; Home Appliances; Outdoor & Recreation; Commercial; Connected Home & Security. The Australian businesses sell Home Appliances products under the iconic Sunbeam and Sistema brands and Outdoor & Recreation goods under the renowned Coleman brand.

Supply Chains

Due to the breadth of the Company's products and global reach of its business, Newell has a complex supply chain. The supply chain is managed by global procurement teams consisting of over 200 employees who oversee local and regional sourcing and supplier arrangements ("Responsible Sourcing team"). The Australian Sunbeam and Coleman businesses source products from suppliers from all over the world.

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
- Vendor Code of Conduct Audit (means a social compliance audit carried out by Newell against its supplier to ensure the supplier is complying with Newell's 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 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:

"We prohibit inhumane labor practices. Our Company complies with laws and regulations directed at protecting the health and safety of the global workforce. We comply with legislation focused on eliminating slavery and human trafficking from global supply chains, including the UK Modern Slavery Act. Our Company rejects, and will not knowingly use business partners that engage in, inhumane labor practices, including:

- The exploitation of children and the use of child labor
- Physical punishment
- Forced or compulsory labor
- Human trafficking.

As part of our commitment to human dignity, we select vendors, suppliers and business partners who certify that they are committed to the health and safety of their workers, do not use forced labor or materials or goods produced by forced labor and implement supplier programs that ensure no materials used in our products come from sources that commit human rights violations."

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 the direct activities, or the supply chains of, Newell. 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

Risks, risk assessment and due diligence

Newell's Responsible Sourcing team analyzes geographic, industry specific and supplier based risks on a regular ongoing basis. Our audit is tailored to address risks of forced labor and modern day slavery. Our audit also addresses common indicators of forced labor.

A risk Newell and other companies face is around countries having weak rules of law. To mitigate this risk, we work closely with factories to ensure they have robust management systems in place to address these risks on a regular and ongoing basis. Newell works to ensure factories establish a proactive culture around human rights and social compliance.

To further mitigate risks Newell provides regular ongoing training to our finished goods suppliers around key social compliance topics such as forced labor to support risk mitigation, continuous improvement and overall supplier development.

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 finished goods 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 finished goods 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 Progress

Newell's goal is to carry out social compliance audits on 100 percent of its finished goods suppliers that are in-scope based on country risk assessments on a three-year rolling basis. Where country risk assessments find suppliers fall into a medium- or high-risk country, those suppliers will fall within the scope of social compliance audits.

In 2020, Newell achieved 95 percent of this goal due to challenges presented by COVID-19. Newell is committed to completing its goal of auditing any remaining suppliers from its 2020 audit in the first half of 2021 as COVID-19 restrictions are lifted. In 2020, Newell conducted and reviewed over 500 social compliance audits to assess suppliers on human rights. Audit topics included: forced labor, child labor, working hours, freedom of association and environmental, health & safety. 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. Newell has an escalation process in place for high risk violations to ensure full issue resolution. Newell's Vendor Code of Conduct Audit includes standards on forced labor

to ensure active monitoring and address any potential risks within the supply chain. Below are some examples of the criteria outlined in the audit:

Risks	Audit Criteria	Supplier Development
<p>Policy/Procedures</p>	<ul style="list-style-type: none"> • Factory policies, procedures, practices for obtaining, implementing, and retaining information on local and national labor and employment laws and regulations • Factory policies and procedures related to wages and benefits, working hours, hiring procedures, forced labor, discrimination and harassment, health and safety, freedom of association, business ethics, and subcontracting • Maintenance of factory procedure manuals and employee handbooks • Proper documentation and maintenance of worker personnel files and records, including labor contracts to verify if the factory is properly signing the contract with all 	<p>Newell holds year-round trainings focused on supplier development and continuous improvement in the supply chain. In 2020, the following trainings were included:</p> <ul style="list-style-type: none"> • Four quarterly webinars were delivered to suppliers in English and Mandarin, covering the following topics: <ul style="list-style-type: none"> - Continuous improvement in fire safety - Forced labor - Newell’s Code of Conduct and anti-bribery - Zero-tolerance issues and how to prevent them • In March 2020, Newell held a virtual roundtable with a sample of its suppliers to discuss how to remediate high-risk findings and proactively address social compliance issues.

		<ul style="list-style-type: none"> • In October 2020, Newell also virtually conducted its 13th annual supplier training event which focused on human rights, responsible sourcing, sustainability and supply chain security.
<p>Factory Management Systems</p>	<ul style="list-style-type: none"> • Agreements for services with third parties include clauses prohibiting harassment and abuse • Mechanisms to confirm employment agency(s) have valid business license/ permit in accordance with local laws • Training for employees with recruitment responsibilities on risks and identification of modern slavery and human trafficking during recruitment process • Safe factory conditions across all health & safety related areas, from but not limited to building, fire safety, workplace condition & ventilation, chemicals handling, machines and special equipment, occupational diseases, 	<ul style="list-style-type: none"> • Each supplier receives a Corrective Action Plan highlighting audit findings and recommended corrective action(s) • The supplier must complete recommended corrective action(s) within a specific timeframe according to severity • Suppliers are to apply root cause analysis to establish long-term solutions to the findings.

	<p>personal protective equipment, first aid and emergency facilities, access to clean drinking water, toilets, etc.</p>	
<p>Migrant Labor</p>	<ul style="list-style-type: none"> • Terms of contract are in writing, and in a language the employee can read, understand, and accepted • Wages are paid directly to the employee and no practice of withholding wages or forced saving • Travel and personal identification documents are in the possession of the workers • Proper documentation supporting that all legally mandated benefits and allowances are provided • Review of employee timecards, piece rate records, pay stubs, other applicable personnel/employer payroll records, production related or other records for random pay periods to verify wages 	<ul style="list-style-type: none"> • Risk assessments across finished goods suppliers • Joint training activities with finished goods suppliers to mitigate impact

Performance indicators

Newell has reviewed its key performance indicators (KPIs) for measuring the effectiveness of its actions being taken to assess and address modern slavery risks in light of the introduction of the Modern Slavery Act 2018 (Cth) and conducts reviews on an annual basis. As a result, Newell:

- Conducted trainings on forced labor to educate finished goods suppliers;
- Continued to perform audits against its Vendor Code of Conduct;
- Utilized its supplier verification process to evaluate potential finished goods suppliers before they enter the supply chain;
- Escalated potential high-risk issues to the relevant parties within Newell with actionable steps, up to, and including, the supplier's removal from Newell's supply chain; and
- Recalibrated its program and updated Newell's Vendor Code of Conduct Audit to ensure that criteria align with emerging trends and current regulatory landscape.

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.

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

Consultation Process

This is a joint statement on behalf of Newell's wholly owned subsidiaries which operate the Australian businesses – Sunbeam Holdings, Sunbeam Corp and Coleman. The procurement and ethical sourcing program described in this Statement is centrally managed by Newell and applies to all the reporting entities across Newell. Engagement cross functionally with each business within Newell takes place on a regular ongoing basis to provide key intel updates on supplier performance. Updates to executive leadership take place through monthly meetings during the Corporate Social Responsibility Council.

Corporate Citizenship Report

As part of Newell's commitment to Corporate Citizenship, Newell recently published its 2020 Corporate Citizenship Report which can be found at <https://newell.brightspotcdn.com/a6/19/24181be4414fb6347f3846154bf9/newell-cc-report-2020-final.pdf>. This report covers Newell's progress around its Corporate Citizenship philosophies. Newell's Corporate Citizenship philosophies direct its efforts to be a force for good and demonstrate the tangible ways it is making a difference. Newell's Corporate Citizenship philosophies are: Diversity, Inclusion and Belonging, Employee Engagement, Sustainability Governance, Climate and Emissions Reduction, Energy Management, Waste Minimization and Diversion, Product and Packaging Lifecycle Innovation, Water Stewardship, Human Rights and Responsible Sourcing, Community Outreach.

Board approval

This statement has been approved by the Board of Newell Australia, on behalf of Newell Australia Pty Limited, and as the parent entity of the other reporting entities covered by this statement, being its wholly owned subsidiaries Sunbeam ANZ Holdings Pty Ltd, Sunbeam Corporation Pty Ltd and Coleman Brands Pty Limited. This Statement will be reviewed and updated annually as required by applicable legislation.

Sincerely,



Preeti Khushu

Director

Newell Australia Pty Limited

29 June 2021