



MODERN SLAVERY STATEMENT

1 July 2023 – 30 June 2024

MTD Products Australia Pty Ltd

This statement has been published in compliance with requirements under the *Modern Slavery Act 2018* and it summarises steps taken by Stanley Black & Decker, Inc. (NYSE: SWK) and its Australian subsidiary MTD Products Australia Pty Ltd (ACN 004 873 572) whose principle place of business is 6-8 Zenith Road, Dandenong South Victoria 3175 (MTD Products) to ensure that modern slavery and human trafficking in any form is not taking place in our commercial organisation, supply chains or in any part of our business. References to Stanley Black & Decker should be read as references to both Stanley Black & Decker Inc and MTD Products.

Introduction and identification of the reporting entity (Criteria 1)

MTD Products is a wholly owned subsidiary of Stanley Black & Decker Inc. As a wholly owned subsidiary of Stanley Black & Decker Inc, MTD Products is required to adhere to the policies and procedures set out by Stanley Black & Decker Inc.

Stanley Black & Decker is actively committed to eradicating human trafficking and slavery from its supply chain. Stanley Black & Decker does not and will not permit its employees, subcontractors, subcontractor employees or agents to engage in any form of trafficking in persons, and will take appropriate action, up to and including termination, against employees, agents or subcontractors that violate this policy. Employees, subcontractors and agents who become aware of a potential violation of this policy are expected to report the potential violation through the company's online helpline at <https://integrity.sbdinc.com/>

Stanley Black & Decker takes pride in:

- maintaining a safe and healthy work environment
- providing a secure workplace for its employees
- embracing sustainable practices
- continually improving and learning from each other
- recognizing and rewarding those who exceed expectations
- creating a safe space for expressing individuality and diversity
- advancing Human Rights in the workplace and supply chain



- giving back and sharing with its communities to make a difference

Stanley Black & Decker Australia Pty Ltd and MTD Products Australia Pty Ltd are the only entities that met the reporting threshold requirement under the *Modern Slavery Act 2018 (Cth)* in 2022. MTD Products Australia Pty Ltd was wholly acquired by Stanley Black & Decker Inc in 1 December 2021.

This Modern Slavery Statement has been produced by MTD Products Australia Pty Ltd, the Reporting Entity under the *Modern Slavery Act 2018 (Cth)*. This Statement outlines how MTD Products approaches the risks of modern slavery and the steps taken to reduce modern slavery and human trafficking risks in its operations and supply chains from 1 July 2023 to 30 June 2024.

Stanley Black & Decker, as a global company, faces increasing legislative demands in relation to modern slavery across many jurisdictions. By way of example, US Customs and Border has introduced a regime that places a greater importance on identifying and eradicating modern slavery practices. Stanley Black & Decker is currently reviewing the recommendations made by US Customs and Border and is in the process of implementing the recommendations of US Customs and Border.

Organisational structure, activities and supply chain (Criteria 2)

MTD Products manufactures lawn and garden products and is the fastest growing riding mower brand in the United States. MTD Products also has a reputation for being world class sports turf equipment. MTD Products include Troy Bilt®, Rover®, WOLF Garten®, Cub Cadet® and Robomow®

Stanley Black & Decker is a diversified global provider of hand tools, power tools and related accessories, outdoor garden maintenance equipment, engineered fastening systems and products and services for various industrial applications, as described in more detail in the 2022 Annual Report, which can be found on the Stanley Black & Decker corporate website at:

<http://www.stanleyblackanddecker.com/investors>.

MTD Products provides these products and services within Australia. Stanley Black & Decker, Inc. is the parent company of MTD Products Australia Pty Ltd. References to Stanley Black & Decker should be read as references to both Stanley Black & Decker, Inc. and MTD Products Australia Pty Ltd.

Stanley Black & Decker has an extensive network of suppliers of raw materials, component parts and finished goods around the world and is actively committed to eradicating human trafficking and slavery from its supply chain.

Stanley Black & Decker is continuously monitoring its internal resources to ensure that it has the right level of resources and skillsets to meet the increasing demands of monitoring and complying with global modern slavery requirements. Stanley Black & Decker recently employed additional staff to meet the increasing demands.



Risks of modern slavery practices in business operations and supply chains (Criteria 3)

Stanley Black & Decker has identified the following risk factors may be present in its operations and supply chains:

- Geographical risks – procuring materials or services outside of Australia where there are low governance standards, conflict or poverty;
- Lack of transparency in supply chains – as supply chains can be multi-tiered, multi-jurisdictional and complex there can be a lack of transparency;
- Sourcing raw materials potentially provides exposure to issues associated with Conflict Minerals; and
- Use of low margin products means that suppliers may seek to exploit children, low-skilled or low paid workers.

Actions taken to assess and address risks including due diligence and remediation processes (Criteria 4)

Global Standards

Stanley Black & Decker implements and enforces global standards. These standards are published on its website at <https://www.stanleyblackanddecker.com/impact/governance/resources-policies>. All suppliers must comply with Stanley Black & Decker's global standards.

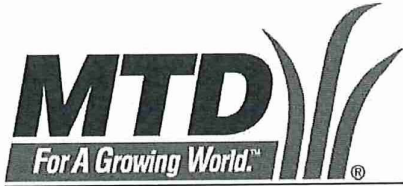
Identification of developed and developing countries and industries

Stanley Black & Decker has processes and monitoring in place which identifies any changes in the markets which could lead to a country moving from a developed country to a developing country (and vice versa). In addition, ongoing monitoring of industries/sectors in both developed and developing countries helps to identify any increased or changing risks. Currently, Stanley Black & Decker has in excess of 40,000 suppliers.

Audits

During the reporting period there were in excess of 150 audits conducted by Stanley Black & Decker or its consultants. These audits identify issues and then categorise them as high, medium or low risk. The categorization of issues identified is further reviewed against the location and industry to ensure that country and industry risks are included within any risk profile. Depending upon the issue and categorization of risk, Stanley Black & Decker will impose the frequency of any further or additional audits.

The nature of audits is reviewed regularly taking into account any previous audit findings, locations,



trends, legislative requirements and recommendations provided by authorities and/or regulators.

Supplier compliance is monitored by requesting supplier self-assessments on both a regular and adhoc basis. The self-assessment requires Stanley Black & Decker suppliers to acknowledge and comply with the terms of the Stanley Black & Decker Supplier Code of Conduct; these terms address amongst other things, Employment Conditions, such as child labour, forced labour and prison labour etc. (the Supplier Code of Conduct can be found on page 6 of our updated Supplier Handbook found at https://www.stanleyblackanddecker.com/sites/stanleyblackanddecker.com/files/sbd_sustainability_social_accountability_manual.pdf). Failure to undertake self-assessments could result in the contract with the supplier being suspended or terminated.

In addition, third party consultants are retained to perform on-site audits in countries that have been identified as being of higher risk of modern slavery practices. Suppliers in countries identified as being of higher risk of modern slavery practices are required to allow onsite audits. Stanley Black & Decker continues to monitor both supplier and country behaviour to ensure that high risk markets and/or suppliers are identified.

New suppliers are audited by the Internal Supplier Quality Team and existing suppliers are audited by independent certification and auditing consultants specialising in identifying modern slavery practices and other risk and compliance issues. All results of audits are carefully reviewed by Stanley Black & Decker's Supplier Risk Team. Audits can include confidential employee interviews of individuals selected by Stanley Black & Decker and/or its consultants. Some audits are unannounced whilst other audits are announced to the suppliers only with as much lead time as minimally necessary to ensure that all required documentation is available to the auditing team. These on-site audits include verification of time and pay records.

Due Diligence

Stanley Black & Decker has determined that its main exposure to modern slavery may be identified within their supply chains and have measured this risk over several years through proactive steps whereby new third party vendors, suppliers and business partners are subject to due diligence checks founded upon compliance audits and ethical policies of how Stanley Black & Decker conducts business as a global organisation. Such assessments and audits are carried out globally and in some cases the Sedex Social Accountability web based platform is used.

Policies

Stanley Black & Decker's commitment to human rights is reflected in its Business Conduct Guidelines, which are posted on the Company websites and are distributed annually to all of the Company employees worldwide. As set forth in the Guidelines:

"The Company [Stanley Black and Decker] is strongly committed to full compliance with human rights and labour standards. The Company facilities and the facilities of the



Company's direct and indirect vendors must ensure that no Company product is made in whole or in part using any child, forced or prison labour. The Company, its subcontractors and agents and their respective employees are expected to comply with the Company's Combating Trafficking in Persons Policy. The Company's managers and the Company's direct and indirect vendors have the obligation to provide for factory inspections, to be vigilant, and to take immediate action to prevent any unfair employment practices".

The due diligence framework is designed to identify (amongst other things) forced labour, child labour and pay equity. The due diligence is reviewed regularly to ensure that it identifies and captures emerging trends.

Human Rights Due Diligence Framework

Stanley Black & Decker has established a Human Rights Due Diligence Framework which utilises a unique internal web-based platform for performance monitoring and data storage of its individual sites. This includes specific Human Rights Road Maps, Risk Assessments and Mitigations and is applicable to all sites globally. These Road Maps describe the standards and steps to ensure adequate human rights adherence at individual site level and so combine to form a global due diligence system. The Human Rights Due Diligence Framework can be found at:
https://www.stanleyblackanddecker.com/sites/stanleyblackanddecker.com/files/human_rights_due_diligence.pdf

The Human Rights Due Diligence Framework is reviewed to ensure that it maintains up to date and captures any evolutions to the exploitation of human rights.

Sourcing raw materials

Stanley Black & Decker is committed to conducting its business in an ethical, law abiding manner. Stanley Black & Decker is aware of the issues associated with the mining of Conflict Minerals (such as tin, tungsten, tantalum and gold) which is occurring in the Democratic Republic of Congo and adjoining countries and its obligations under the Dodd-Frank Act (US).

Stanley Black & Decker works with its suppliers to educate them regarding the issues surrounding Conflict Minerals and steps that can be taken to obtain an increased transparency regarding the origin of minerals contained in the products that are supplied to Stanley Black & Decker. Selected suppliers are required to complete a survey which helps identify any risks of Conflict Minerals. Suppliers are selected on the basis of location, contract spend, risk factors identified in the supply chain and to ensure compliance with section 1502 US Dodd Frank Act. In 2023, 670 suppliers completed the survey and in some cases, suppliers were required to provide additional information to Stanley Black & Decker.

Stanley Black & Decker reserves the right to request additional information from suppliers regarding the origin of Conflict Minerals. If a Supplier fails to cooperate, this could lead to Stanley Black & Decker discontinuing purchases from the Supplier. In 2023, no suppliers refused to co-operate.

If suppliers identified sourcing their materials from high-risk regions such as the Democratic Republic of Congo and adjoining countries, the suppliers were required to:

- (a) Determine if the smelter was "conflict-free;" and



- (b) Require the smelter to participate in an audit program or
- (c) Remove the smelter from the supply chain.

The above action must be taken within 6 months of notification.

Stanley Black & Decker has a Conflict Mineral Policy which can be found at https://www.stanleyblackanddecker.com/sites/default/files/2022-07/swk_conflictmineralspolicy.pdf

Code of Business Ethics

Stanley Black & Decker also has a Code of Business Ethics which applies to employees, officers, directors, contractors, vendors and suppliers. Its managers and board members annually acknowledge their understanding of this Code and its tenets. Stanley Black & Decker's reputation, culture and values are important to its success; any violations of the Code, or the law, will result in disciplinary action, up to and including termination.

The Code of Business Ethics can be found at:

<https://www.stanleyblackanddecker.com/sites/stanleyblackanddecker.com/files/stanley-black-and-decker-cobe-english.pdf>

Investigations and reporting

Stanley Black & Decker will investigate reports of violations of this Code or corresponding policies, and it strictly prohibits retaliation against anyone who reports a concern in good faith. There have been no reports of Violation of our Code or Corresponding Policies. Should these occur they will be investigated on a confidential basis.

Training – internal and external

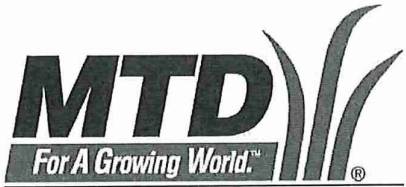
Stanley Black & Decker Australia Pty Ltd ensures all senior management are annually trained to aid their understanding with Stanley Black & Decker's Business Conduct Guidelines which determine how Stanley Black & Decker Australia Pty Ltd conduct its business. Stanley Black & Decker Australia Pty Ltd implements ethical policies founded upon standards for sustainability and social accountability to protect the business.

Stanley Black & Decker is also reviewing its training program with a view to creating virtual/on-demand online training modules which can be accessed by its suppliers. Some topics will be mandatory viewing for suppliers and failure to complete the online training could result in suspension or termination of the supply contract.

Supplier assistance

Historically, Stanley Black & Decker had a compliance "Hotline" that was used by third parties to report any suspected breaches of Stanley Black & Decker's standards or code of conduct. This Hotline will be replaced by the "Helpline".

Stanley Black & Decker is currently implementing a "Helpline" which will provide assistance to all of its



suppliers, employees and consultants in managing supply chain risks. This could include, for example, a supplier querying what steps need to be taken in its supply chain to ensure compliance, or querying whether particular conduct falls foul of Stanley Black & Decker's requirements in relation to modern slavery. It is hoped that this helpline will be operational globally within the next 12 months.

Assessment of effectiveness of actions being taken to assess and address modern slavery risks (Criteria 5)

Stanley Black & Decker has incorporated the assessment and effectiveness of risk and compliance measures (which includes modern slavery considerations) into the Category Manager's business review. Standard team meetings also discuss any identified new areas of risk or changes to the risk profiles of countries, industries or suppliers.

Employees and suppliers are monitored to ensure that they are respecting and adhering to the Business Conduct Guidelines. Assessments and audits of suppliers are conducted globally. Any issues that are identified are corrected using a corrective action plan highlighting the issue, corrective action, responsible party for implementation and timing.

Suppliers are rated for compliance with Stanley Black & Decker practices and standards. Deficiencies found during supplier audits can result in graduated penalties, ranging from requirements for corrective action plans and follow up audits to termination of the business relationship. Any issues that are identified are corrected using a corrective action plan highlighting the issue, corrective action, responsible party for implementation and timing.

Stanley Black & Decker's Supplier Risk Team meets regularly to monitor the effectiveness of its initiatives to identify modern slavery risks. Suppliers must allow Stanley Black & Decker (or its consultants) rights to conduct audits of its suppliers and their personnel to assess compliance with modern slavery provisions. These audits are implemented as part of Stanley Black & Decker's supplier sustainability audit process.

Consultation with any entities MTD Products owns or controls (Criteria 6)

MTD Products Australia Pty Ltd does not own or control any entities.

Conclusion

Stanley Black & Decker recognises the importance of a continuous improvement approach to combating modern slavery risks in its operations and supply chains. Stanley Black & Decker's commitment to its current modern slavery initiatives establishes a strong foundation for identifying and managing modern slavery risks.



This statement covers the period from 1 July 2023 to 30 June 2024.

Consultation and Approval

This statement was prepared by the Product Compliance Team of Stanley Black & Decker who have consulted with directors, compliance and audit teams, employees, stakeholders and external consultants of both MTD Products Australia Pty Ltd and Stanley Black & Decker Inc.

This Modern Slavery Statement has been approved by the Board of MTD Products Australia Pty Ltd, the Reporting Entity under the *Modern Slavery Act 2018 (Cth)*.

Signed by:

A handwritten signature in black ink, appearing to read 'Adrian Davis', with a long horizontal flourish extending to the right.

Adrian Davis
Director of MTD Products Australia Pty Ltd
on behalf of the Board of MTD Products
Australia Pty Ltd