

NEWELL AUSTRALIAN MODERN SLAVERY ACT STATEMENT 2022

Introduction

This 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 Sistema Plastics Australia Ltd have taken for the financial year ending 31 December 2022 and are continuing to take to combat any modern slavery, forced labor or human trafficking within their business, operations and 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. We are dedicated to conducting business in a lawful and ethical manner. We are also committed to preventing any occurrence of slavery and human trafficking from our supply chain.

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 Australia is the Australian arm of its ultimate holding company, Newell Brands Inc. (collectively, together with its subsidiaries, "Newell" or "the Company"), which is headquartered in the United States of America.

Sistema Plastics Australia Ltd is a New Zealand company which is part of the broader Newell group, is an own operated supplier which both manufactures food storage containers and sells these into Australia.

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®, 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 three operating segments: Learning & Development (covering the Writing and Baby sub-segments), Home & Commercial Solutions (covering the previously reported Commercial Solutions, Home Solutions and Home Appliances operating segments) and Outdoor & Recreation.

Supply Chains

Due to the breadth of the Company's products and global reach of its business, Newell has a complex supply chain. The global supplier network is managed by a global responsible sourcing team of 12 employees led by a global enterprise director ("Responsible Sourcing team"). The team oversees the execution of a global monitoring plan related to social compliance and supply chain security audits. Newell Australia sources finished goods from suppliers from all over the world.

Producing thousands of products for more than 100 brands requires a robust and global supply chain. Our responsible sourcing program, which includes both social compliance and security, aims to create transparency across our supply chain to ensure customers and consumers receive ethically produced sourced products.

Relevant policies and protocols

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 and supply chains:

- 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 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"

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.

Our Code of Conduct also affirms our Company's commitment to work with business partners who promote the same ethical labor standards. 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 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."

The Newell Code of Conduct applies to:

- Employees of Newell Brands regardless of location, seniority, business division or function
- Members of our Board of Directors
- Executive Officers
- Third parties acting on our behalf, including agents, representatives, independent contractors and consultants, must follow equivalent standards

Newell recognizes the potential for modern slavery practices such as indentured labor and debt bondage which may arise on recruitment of staff. Newell uses only specified, reputable employment agencies to source labor and verifies the practices of any new agency before accepting workers from that agency.

Other ways in which Newell evaluates compliance with the Newell Code of Conduct in its own operations include yearly mandated staff training and enterprise-wide policies which reflect the Code of Conduct standards. These policies are monitored by internal audits and external compliance checks and any issues are managed by an enterprise-wide Board level review committee.

Vendor Code of Conduct and Supplier Assurance

Newell sits in a unique position within the consumer products value chain. We source raw materials and components, as well as finished goods, from a network of thousands of suppliers. We also are a supplier ourselves, selling our products to some of the world's largest retailers, including Walmart, Amazon, Target and Costco. These retailers have their own responsible sourcing programs and expectations of vendors, which means in addition to Newell's internal responsible sourcing program standards, we partner with our customers and suppliers to ensure compliance across our supply chain. Today, we're responding to new supply chain risks, government and regulatory changes and legislation, and heightened customer expectations of responsible sourcing standards. For Newell, as well as other multinational companies that source products globally, managing a global supply chain now goes well beyond compliance. It requires proactive identification of risks, precise monitoring of data and deep engagement with suppliers and customers.

It is our expectation that the manufacturers and suppliers with whom we do business will share our commitment to fair and safe labor practices and conduct themselves in a lawful and ethical manner. Consistent with this commitment, we have developed our Responsible Sourcing Standards, which prohibits the use of unlawful child labor and forced or involuntary labor of any kind.

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’s standard Master Purchase Agreement requires that its suppliers represent and warrant that all labor and/or materials used in connection with the provision of any products provided to Newell were “employed and/or produced in compliance with applicable laws forbidding slavery and human trafficking.”

Ethics Hotline

Newell encourages all its workers, customers and other business partners to report any concerns related to Newell’s direct activities or its supply chain. This includes circumstances that may give rise to an increased risk of slavery or human trafficking. Newell’s whistleblowing procedure is designed to make it easy for workers to make disclosures, with global toll free numbers. Employees, customers or others who have concerns can confidentially contact the company’s Ethics Hotline.

The Ethics Hotline is a safe way for concerns about potentially unethical conduct to be shared, without fear of retaliation. It hosted and operated by an independent third party, and spoken or written reports are accepted in many languages. Reports may be made anonymously where permitted by law. Newell’s Global Ethics & Compliance team address reports promptly, discreetly and to the extent possible, confidentially.

Risks, Risk Assessment and Due Diligence

The greatest potential risk of slavery and human trafficking in Newell’s business is in its 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’s Responsible Sourcing team analyzes geographic, industry specific and supplier based risks on a regular ongoing basis. Newell’s Vendor Code of Conduct Audit includes standards on forced labor and addresses common indicators of modern day slavery to ensure

active monitoring and address any potential risks within the supply chain. We have had no identified instances of this activity occurring in our supply chain in the reporting year.

We use internal and external auditors layered over each other 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. If we identify a Zero Tolerance event occurring in our supply chain, a senior leadership council reviews the event and takes appropriate corrective action.

To mitigate the risks of modern slavery arising in Newell's supply chain, we implement a Management Action Plan (MAP) with the impact factory and conduct escalated monitoring and tracking of performance. Newell works to ensure factories establish a proactive culture around human rights and social compliance.

When engaging new finished goods suppliers Newell's due diligence and reviews include: capabilities assessment, financial verification and Newell's Vendor Code of Conduct review prior to commencing business with a supplier.

Newell has developed a detailed process to evaluate a supplier's ongoing compliance with our Responsible Sourcing Standards. Through this process, it conducts periodic, announced and unannounced assessments of our suppliers designed to verify their compliance with our Vendor Code of Conduct. These assessments are conducted by Newell Brands Corporate Social Responsibility team or a third party, as appropriate. Newell also 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.

Our evolving due diligence practices involve stronger engagement among industry peers, including sharing of best practices and audit processes and establishment of industry standards. For example, instead of requiring suppliers to respond to repeated questionnaires and audit requests, we're coordinating with industry organizations that conduct standardized audits that many customers can access, saving time and resources and reducing audit fatigue. We've also updated our audit scoring methodology, simplifying our grades to A, B, C and F for scoring and continue to actively maintain our strict zero tolerance process. This scoring approach better aligns factory performance with industry guidelines.

In addition to responsible sourcing audits which Newell performs itself, when we receive shared reports or audits conducted by third party monitoring firms, we conduct post-audit verification. In 2022, our first year using this approach, Newell conducted a total of 192 post audit and follow-up verifications. We found significant improvement at these factories in the

implementation of corrective action plans and closure rates. In addition, we're expanding our internal capabilities and working toward certifying our program against industry audits, like SEDEX, RBA and Amfori-BSI. This would allow us to share audits with customers and other key stakeholders and have a laser focus on identifying potential risk or exposure to human trafficking in our supply chain.

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.

Training

Employees tasked with supplier compliance as well as other employees with direct responsibility for supply chain management are provided training on human trafficking and slavery, including ways to mitigate the risks of these practices within our supply chain. Since our employees have been trained to identify non-compliance, they are expected to report to our Vice-President of Global Sourcing, the Ethics and Compliance Team or the Legal Department any potential unlawful or unethical conduct within the supply chain.

To further mitigate modern slavery risks in its supply chain, 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.

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 2022, Newell achieved 85 percent corrective action plan closure for any opportunities that presented themselves in our suppliers' operations.

In 2022, Newell conducted and reviewed 697 factories through various audit schemes 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.

In the reporting period, Newell put an elevated emphasis on responsible sourcing and appointed a director to run Newell’s Responsible Sourcing team and transform our approach to responsible sourcing. This enables us to be strategic and responsive to risks and opportunities, building greater confidence with internal and external stakeholders. Our new structure has three pillars:

Vendor Resiliency	Data Analysis	Vendor Enablement
Using risk assessments and audits to prioritize suppliers based on risk	Producing reports to communicate actionable findings to optimize our program	Helping suppliers improve through ongoing interventions, training, and engagement

Performance indicators: Achievements in 2022

Newell has key performance indicators (KPIs) for measuring the effectiveness of its actions being taken to assess and address modern slavery and conducts reviews on an annual basis, including the following which were measured in 2022:

- Completion of 697 responsible sourcing audits which account for 92 percent of Newell’s sourced finished goods spend.
- Reached 94% closure of corrective action plans for the 2022 rolling period.
- Hosted two remote supplier training sessions.

Newell’s Responsible Sourcing 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/ethics-compliance>.

Consultation Process

This is a joint statement on behalf of Newell Australia Pty Limited and Sistema Plastics Australia Pty Ltd, both of which are wholly owned subsidiaries of Newell Brands, Inc. and which conduct business in Australia. The procurement and ethical sourcing program described in this Statement is centrally managed by Newell's enterprise-wide Responsible Sourcing team and applies to all of the Newell reporting entities including these reporting entities. Engagement cross functionally with each business within Newell takes place on a regular ongoing basis to provide key intelligence updates on supplier performance and monitoring of responsible sourcing and social compliance initiatives.

Corporate Citizenship Report

As part of Newell's commitment to Corporate Citizenship, Newell recently published its 2022 Corporate Citizenship Report which can be found at <https://www.newellbrands.com/community/corporate-citizenship>

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. The 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 the Board of Newell Australia, on behalf of Newell Australia Pty Limited. This Statement will be reviewed and updated annually as required by applicable legislation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Raj Dave', with a stylized flourish at the end.

Raj Dave

Director

Newell Australia Pty Limited

May 23, 2023

ANNEXURE 1 - MODERN SLAVERY ACT 2018 (Cth) MANDATORY CRITERIA CHECK-LIST

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Newell Australia Pty Limited as defined by the *Modern Slavery Act 2018* (Cth)¹ (“the Act”) on May 23, 2023.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Newell Australia Pty Limited as defined by the Act².

Mandatory criteria

The table below outlines where information related to each of the mandatory criteria in section 16 of the Act can be found:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity’s structure, operations and supply chains.	1 - 2
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5 - 7
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	2-7
e) Describe how the reporting entity assesses the effectiveness of these actions.	8-9
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	9
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.*	9

* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

¹ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

² Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator;