

AUSTRALIAN MODERN SLAVERY ACT STATEMENT 2021

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 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") have taken for the financial year ending 31 December 2021 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. 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 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. Newell also operates in Australia through its other Australian subsidiaries Sunbeam Holdings and Sunbeam Corp. Sistema Plastics Australia Ltd (Australian Branch) is also part of the broader Newell 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®, 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 seven business units: Home Fragrance, Baby, Writing, Food, Home Appliances, Outdoor & Recreation and Commercial. The Australian businesses sell products of Writing, Commercial, Baby, Home Appliances under the iconic Sunbeam brand, Outdoor and Recreation as renowned Coleman brand and so on.

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 global procurement teams consisting of over 200 employees who oversee local and regional sourcing and supplier arrangements ("Responsible Sourcing team"). The Australian businesses source 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 & Standards

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.

Vendor Code of Conduct and Supplier Assurance

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.”

Additionally, we have also revised our standard Master Purchase Agreement to require our suppliers to represent and warrant that all labor and/or materials used in connection with the provision of any products provided to us 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

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. 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 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 this risk, 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. 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.

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, we conduct 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.

In addition to annual Vendor Code of Conduct confirmation, Newell undertakes social compliance trainings including developing corrective action plans. 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.

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 2021, Newell achieved 90 percent corrective action plan closure for any opportunities that presented themselves in our suppliers’ operations. In this regard, challenges presented by COVID-19 still posed obstacles to in person audits.

In 2021, Newell conducted and reviewed 498 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. 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.

Set out below are some examples of the criteria outlined in the audit and examples of Supplier Development actions undertaken in 2021. This includes quarterly trainings webinars for our suppliers and held annual supplier trainings coverings all aspects of our policies prohibiting modern slavery in our supply chain.

| Risks | Audit Criteria | Supplier Development |
|-------------------|---|---|
| Policy/Procedures | <ul style="list-style-type: none"> Factory policies, procedures, practices for | Newell holds year-round trainings focused on supplier |

| | | |
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| | <p>obtaining, implementing, and retaining information on local and national labor and employment laws and regulations</p> <ul style="list-style-type: none"> • 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>development and continuous improvement in the supply chain. In 2021, the following trainings were included:</p> <ul style="list-style-type: none"> • 14th Annual supplier training with over 368 participants. • 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 • 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. • Newell virtually conducted its 14th annual supplier training event which focused on human rights, responsible |
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|-----------------------------------|---|---|
| | | <p>sourcing, sustainability and supply chain security.</p> |
| <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, personal protective equipment, first aid and emergency facilities, access to clean drinking water, toilets, etc. | <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>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 |
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Performance indicators

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. As a result, in 2021 Newell:

- Conducted quarterly online virtual 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 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 its wholly owned subsidiaries which operate the Australian businesses – Sunbeam ANZ Holdings Pty Ltd and Sunbeam Corporation Pty Ltd. The procurement and ethical sourcing program described in this Statement is centrally managed by Newell's Responsible Sourcing team 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 intelligence updates on supplier performance.

Updates are provided to executive leadership during monthly Corporate Social Responsibility Council meetings.

Corporate Citizenship Report

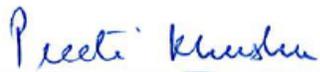
As part of Newell's commitment to Corporate Citizenship, Newell recently published its 2021 Corporate Citizenship Report which can be found at <https://www.newellbrands.com/community/corporate-citizenship>

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. In 2021, Newell Brands conducted our first materiality assessment to better understand the corporate citizenship topics most important to stakeholders. Based on the materiality assessment, Newell Brands shifted to four corporate citizenship focus areas which guide reporting including Our Products, Our Planet, Our People and Our Communities.

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 from 2021 covered by this statement, being its wholly owned subsidiaries Sunbeam ANZ Holdings Pty Ltd and Sunbeam Corporation Pty Ltd. This Statement will be reviewed and updated annually as required by applicable legislation.

Sincerely,



Preeti Khushu

Director

Newell Australia Pty Limited

May 10, 2022

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 April 27, 2022.

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 |
| 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. | 2-10 |
| e) Describe how the reporting entity assesses the effectiveness of these actions. | 6 -10 |
| 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). | 11 |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.* | 12 |

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

¹Section 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;