

Modern Slavery and Human Trafficking Statement 2017

Spectrum Brands (UK) Limited as part of the Spectrum Brands Inc. group of companies (“**Spectrum**”) is committed to the highest standards of business conduct in its relationship with its customers, suppliers, shareholders and others and strives to conduct its business in accordance with the highest standards of business ethics. This includes Spectrum’s commitment to conducting its business in a manner that ensures the absence of slavery and human trafficking in its supply chain.

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out steps taken by Spectrum to prevent modern slavery in their business operations and supply chains.

It has been approved by the directors of Spectrum Brands (UK) Limited and signed by Tim Wright, Managing Director of Spectrum Brands (UK) Limited.

About Spectrum

Spectrum Brands (UK) Limited is part of the Spectrum Brands Inc. group of companies which is based in Middleton, Wisconsin, USA. We have over 15,500 employees worldwide and operate in 49 countries.

Spectrum is a global consumer products company offering an expanding portfolio of leading brands providing superior value to consumers and customers every day. Our business is organised into 4 business divisions:

- Global Batteries and Appliances
- Hardware and Home Improvement
- Pet, Home and Garden
- Global Auto Care

We are a leading supplier of consumer batteries, residential locksets, residential builders’ hardware, plumbing, shaving and grooming products, personal care products, small household appliances, specialty pet supplies, lawn and garden and home pest control products, personal insect repellents, and auto care products. Helping to meet the needs of consumers worldwide, we offer a broad portfolio of market-leading, well-known and widely trusted brands.

Spectrum products are sold by the world's top 25 retailers and are available in more than one million stores in approximately 160 countries.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Spectrum expects and requires each of its suppliers to conduct business in a lawful and ethical manner including business practices that prevent or eliminate slavery and human trafficking in its supply chain.

Spectrum communicates this expectation by requiring all Suppliers who provide materials and products to comply with Spectrum's Supplier Code of Conduct (<http://www.spectrumbrands.com/aboutus/supplier-code-of-conduct.aspx>) (the "Code"). The Code, among other issues, specifically forbids the use of slave, forced or involuntary labour of any kind, including unlawful child labour and prohibits Suppliers from maintaining supply chains that engage in human trafficking.

Additionally, Spectrum supports the ETI Base Code stated in the Ethical Trading Initiative implementing human rights, ethical labour practices, and environmental protection standards. The Initiative is available at www.ethicaltrade.org.

The Code (described above) requires that employment is freely chosen and not forced in addition to other similar commitments to ensure the absence of slavery and human trafficking in Spectrum's Suppliers supply chains.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values the Code includes a certification signed by the Supplier acknowledging its responsibility for adhering to the standards of the Code. Suppliers must also ensure that the Code is observed by Suppliers' subcontractors, business associates or employees.

Spectrum identifies and utilises Suppliers who share its commitment to ensure the absence of slavery and human trafficking in its supply chain and reserves the right for itself or through third party auditors, to conduct, or have conducted on its behalf, unannounced audits of production facilities and business practices to monitor Suppliers' commitments.

Where Spectrum deems appropriate it may provide a non-compliant Supplier the opportunity to remedy the non-compliance through implementation of a corrective plan. If the Supplier fails to meet Spectrum's standards, Spectrum will seek to terminate the Supplier from its supply chain. Spectrum reserves the right to cease doing business with any Supplier who is not in compliance with the Code.

Training

Spectrum is committed to implementing and maintaining ongoing training of its employees and consultants on slavery and human trafficking to recognize and mitigate these risks in its supply chains.

We also work with our suppliers on an ongoing basis through effective communication, leading by example in our own manufacturing plants, and provide encouragement support and guidance on acceptable conduct.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 September 2017.

Signed:



Date:

22 JANUARY 2018

Tim Wright

Spectrum Brands UK Limited
