

Modern Slavery and Human Trafficking Statement 2019

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 and human trafficking 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.

Our business and supply chain

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:

- Home and Personal Care
- Hardware and Home Improvement
- Home & Garden
- Global Pet Care

We are a leading supplier of 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 and personal insect repellents. 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. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

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.

In addition, Spectrum's retail and commercial customers (the "**Customers**") concerned about preventing and eradicating slavery and human trafficking in their supply chains, require verification through Customers' audits of Spectrum's and Spectrum's manufacturers' facilities that Spectrum's products are manufactured through supply chains that adhere to anti-slavery and anti-human trafficking policies. Thus Spectrum's supply chains have been subject to intense scrutiny under both Spectrum's and its Customers' anti-slavery and anti-human trafficking polices (including announced and unannounced audits) prior to and after the release of Modern Slavery Act 2015.

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.

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.

As of 1 January 2018, Spectrum is listed as an amfori-BSCI Brand-category global member. BSCI provides a system that helps companies to gradually improve working conditions in their supply chain.

Supplier adherence to our values

Spectrum have zero tolerance to slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts. We fully support the government objectives to eradicate modern slavery and human trafficking.

It is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the management of its activities.

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.

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.

Spectrum expects all Delivery Partners, organisations within our Frameworks and other companies we engage with to ensure their goods, materials and labour-related supply chains:

- Fully comply with the Modern Slavery Act 2015; and are
- Transparent, accountable and auditable; and are
- Free from ethical ambiguities

Training

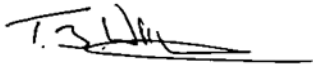
Spectrum is committed to implementing and maintaining ongoing training of its employees and consultants on slavery and human trafficking in order to:

- raise awareness of modern slavery and human trafficking
- recognize the risks of modern slavery and human trafficking in our supply chains
- identify and report potential breaches of our Supplier Code of Conduct
- understand the consequences for failing to ensure that there is no modern slavery and human trafficking in our supply chain
- mitigate any risks in our supply chains

Responsibility for the preparation and publication of this policy resides with our department of Legal Services.

For more information on Spectrum's commitment to ensure the absence of slavery and human trafficking in its supply chains, click on the Code link above. Spectrum reserves the right to amend this Statement at any time without notice.

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 2019.



April 2020

Signed:

Date:

Tim Wright

Spectrum Brands (UK) Limited
