

Modern Slavery and Human Trafficking Statement 2020

Introduction

Spectrum Brands (UK) Limited (“**Spectrum Brands**”) 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 Brands 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 Brands to prevent modern slavery and human trafficking in their business operations and supply chains. It will replace our previous statement, published in April 2019, effective upon approval by the Executive Board.

Our business and supply chain

Spectrum Brands (UK) Limited is part of the Spectrum Brands Inc. group of companies based in Middleton, Wisconsin, USA. We have on average 12,000 employees worldwide operating in 49 countries.

Spectrum Brands Inc. 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.

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

Spectrum Brands (UK) Limited

Registered Office: Regent Mill | Fir Street | Failsworth | Manchester | M35 0HS | Tel: +44(0)161 947 3000

Registration No. 02394603 | VAT Reg. No. GB 532 783437

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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 Brands 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 condemn any business that knowingly or unknowingly complicit in modern slavery and human trafficking crimes. 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 Brands communicates this expectation by requiring all Suppliers who provide materials and products to comply with Spectrum Brands Inc. Supplier Code of Conduct (updated in April 2020) (<https://www.spectrumbrands.com/about-us/suppliers/supplier-code-of-conduct.html>) (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. It has been drafted based on the guidance set forth in the standards of the International Labor Organization Conventions, the United Nations' Universal Declaration of Human Rights, the United Nations' Convention on the Elimination of All Forms of Discrimination against Women, the United Nations' Conventions on Children's Rights, the United Nations' Global Compact, the Ethical Trading Initiative, the Organization of Economic Cooperation, the Development Guidelines for Multinational Enterprises, the Foreign Corrupt Practices Act, the UK Bribery Act 2010 and it applies to all subsidiaries, controlled affiliates and joint ventures of Spectrum Brands Holdings, Inc. The relevant account managers will monitor and enforce compliance of the Supplier Code of Conduct.

In addition, Spectrum Brands 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 Brands and Spectrum Brands manufacturers’ facilities that Spectrum Brands products are manufactured through supply chains that adhere to anti-slavery and anti-human trafficking policies. Thus Spectrum Brands supply chains have been subject to intense scrutiny under both Spectrum Brands and its Customers’ anti-slavery and anti-human trafficking policies including announced and unannounced audits prior to and after the release of Modern Slavery Act 2015.

Additionally, Spectrum Brands 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.

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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 Brands Suppliers' supply chains. Spectrum Brands utilizes fair employment practices, as well as strives to provide a safe, healthful, healthy and productive work environment for its employees and expects its Suppliers to uphold the same standards.

As of 1 January 2018, Spectrum Brands 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 Brands have zero tolerance to slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant country of operations. We continue to commit to providing customers with goods that have been produced in decent and safe working conditions, lawfully through fair and honest dealings and without exploiting the people who made them. We fully support the government objectives to eradicate modern 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 Brands 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 Brands 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 Brands standards, Spectrum Brands will seek to terminate the Supplier from its supply chain. Spectrum Brands 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.

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

- fully complied with the Modern Slavery Act 2015; and are
- transparent, accountable and auditable; and are
- free from ethical ambiguities

Training

Spectrum Brands 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

COVID-19

We understand that some workers may be more vulnerable to modern slavery during the coronavirus pandemic. Spectrum Brands adopted Covid-19 safe workplaces in line with government guidelines that were duly communicated to our employees in an accessible format with regular updates. We have also communicated with our employees about best practices on working from home and regular support being available from their respective managers if necessary to safeguard their wellbeing.

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DreamBone
The Healthy Alternative to Hardbiscuits

SmartBones
The Healthy Alternative to Hardbiscuits

Next steps

Following a review of the effectiveness of the steps, we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking by:

- raising awareness of Modern Slavery and Human Trafficking Statement as well as our updated Supplier Code of Conduct with our employees and suppliers
- additional training for employees as necessary
- continuing to promote transparency and accountability in our commercial dealings
- integrating any learnings from Covid-19 into our future strategy

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

For more information on Spectrum Brands commitment to ensure the absence of slavery and human trafficking in its supply chains, click on the Code link above. Spectrum Brands 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 Spectrum Brands slavery and human trafficking statement for the financial year ending 30 September 2020. It was approved by the Executive Board of Spectrum Brands (UK) Limited and signed by Tim Wright, Senior Vice President of Spectrum Brands (UK) Limited.



Signed:

Date: March 2021

Tim Wright
Senior Vice President
Spectrum Brands (UK) Limited

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