

# **Consolidated Forced Labor and Modern Slavery Statement 2026**

**Reporting period: FY2025**

**Reporting Entities:** Empower Brands Canada, Inc.; Spectrum Brands (UK) Limited;  
Spectrum Brands Australia Pty. Ltd.

## 1. Introduction

Spectrum Brands Holdings, Inc., together with its controlled affiliates and subsidiaries (collectively, “Spectrum Brands”), is committed to conducting business ethically and to ensuring the absence of forced labor, modern slavery and human trafficking in our operations and supply chains. This consolidated report is prepared to address the requirements of Canada’s Fighting Against Forced Labor and Child Labor in Supply Chains Act (S-211), the United Kingdom Modern Slavery Act 2015 (Section 54), and the Australian Commonwealth Modern Slavery Act 2018.

This single report is designed to meet each jurisdiction’s disclosure expectations. It draws on existing reports for Empower Brands Canada, Inc., Spectrum Brands (UK) Limited, and expands on our approach across all reporting entities.

## 2. Scope, Entities and Reporting Approach

This report covers Empower Brands Canada, Inc.; Spectrum Brands (UK) Limited; and Spectrum Brands Australia Pty. Ltd. Where policies and processes are enterprise-wide, they apply to all Spectrum Brands entities unless otherwise specified.

Our report aligns to the six reporting areas referenced in UK statutory guidance and maps to Canada S-211 and Australia’s mandatory criteria. Jurisdiction-specific approvals and publication requirements are set out in Section 10.

## 3. Organizational Structure and Supply Chains

Spectrum Brands is a leading global branded consumer products and home essentials company. We operate through three divisions: Home & Personal Care (HPC), Home & Garden (H&G), and Global Pet Care (GPC). Our products are sold by the world’s top retailers and are available in more than one million stores across approximately 160 countries. Empower Brands Canada is primarily dedicated to the sale and distribution of HPC products and operates from Etobicoke, Ontario. Spectrum Brands (UK) Limited operates from Failsworth, Manchester (head office) and Wombourne, Staffordshire (warehousing).

Due to the breadth of our product offerings and operations, our supply chain is complex and global, encompassing product design, component sourcing, contract manufacturing, logistics, and distribution. The majority of our Tier 1 manufacturing suppliers are located in China and the broader Asia-Pacific region.

We maintain dedicated global procurement teams that oversee sourcing and supplier relationships, supported by internal audit, legal, and regulatory functions. Our Supplier Code of Conduct applies to all suppliers, subcontractors and business partners and prohibits forced or involuntary labor, unlawful child labor and human trafficking.

Spectrum Brands supports the ETI Base Code stated in the Ethical Trading Initiative implementing human rights, ethical labor practices, and environmental protection standards. The Initiative is available at [www.ethicaltrade.org](http://www.ethicaltrade.org). The ETI Base Code 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, strives to provide a safe, healthful, healthy and productive work environment for its employees, and expects its Suppliers to uphold the same standards.

Since January 1, 2018, Spectrum Brands has been 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.

We are considering expanding supply chain mapping to additional Tier 2 and Tier 3 inputs for selected high-risk product categories and geographies.

#### **4. Policies on Modern Slavery and Related Standards**

Our policy framework includes, among others: Code of Business Conduct and Ethics; Human Rights Policy; Supplier Code of Conduct; Whistleblowing Policy; Anti-Bribery Policy; Child Labor Remediation Policy; Global Procurement Policy; Environmental, Biodiversity, and Deforestation Policy; and our Policy Regarding Conflict Minerals.

Supplier adherence is enforced through contractual obligations, certifications to the Supplier Code, and the right to conduct announced and unannounced audits of facilities. Non-compliance may lead to corrective action plans and, where required, suspension or termination.

Spectrum Brands requires all Suppliers who provide materials, products or services to comply with the Spectrum Brands Supplier Code of Conduct (<https://www.spectrumbrands.com/about-us/suppliers/supplier-code-of-conduct.html>) (the "**Supplier Code**"). The Supplier Code applies to all subsidiaries, controlled affiliates and joint ventures of Spectrum Brands and specifically forbids the use of slavery, forced or involuntary labor of any kind, including unlawful child labor, and prohibits Suppliers from maintaining supply chains that engage in human trafficking. The Supplier Code has been drafted in accordance with, and 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, and the UK Bribery Act 2010.

The Supplier Code includes a certification, requiring our suppliers to acknowledge its responsibility for adhering to the standards of the Supplier Code. Suppliers must also ensure that the Supplier Code is observed by our Suppliers' subcontractors, business associates and employees.

We intend to strengthen our policy suite to clarify expectations on responsible recruitment (including prohibition of worker-paid recruitment fees), freedom of movement, and retention of identity documents across all supplier tiers.

## **5. Due Diligence Processes**

Our risk-based due diligence lifecycle includes: (i) onboarding assessments and supplier acknowledgements of the Supplier Code; (ii) third-party social compliance audits (e.g., amfori BSCI or equivalent); (iii) ongoing monitoring through audit results, grievance channels, and customer audits; and (iv) escalation and remediation where issues are identified.

We utilize a combination of desktop assessments, site audits, worker and management interviews, and document reviews. Findings are captured in corrective action plans with defined owners and timelines; closure is evidenced and validated.

We continually evaluate our due diligence to identify evolving and/or new risks or issues based on evolving sourcing efforts.

## **6. Risk Assessment and Management**

Spectrum Brands performs ongoing enterprise and supply chain risk assessments across categories such as geography, industry, supplier-related factors, and known sector risks (e.g., conflict minerals).

We prioritize mitigation through supplier engagement, capability-building, and, when necessary, intensified monitoring or disengagement. Distributor risks are assessed and managed through extended standards and oversight.

We are exploring measures to further strengthen our risk-management practices, including potential efforts to improve visibility into Tier 2 inputs and expanding supplier engagement and communication.

## **7. Training**

Nearly all employees complete annual Code of Conduct training that includes human rights content. Targeted training is provided to procurement, sourcing, quality, and supplier management teams on identifying risk indicators and managing non-compliance. We also provide supplier-facing guidance on the Supplier Code and audit readiness.

We are considering the implementation of learning modules and scenario-based workshops for high-impact functions, including commodity managers and site quality leads in higher-risk geographies.

## **8. KPIs and Effectiveness**

We anticipate monitoring progress through a combination of activity and outcome indicators, internal audits, and review of supplier performance.

We are considering adopting a harmonized KPI framework aligned to UK guidance on monitoring and evaluation and Australia's "assessing effectiveness" criterion. Targets will be reviewed annually by our Legal & Risk Mitigation and Global Sourcing teams.

- **Supply Chain Visibility:** Percentage of Tier 1 suppliers mapped (target: 95%) and priority Tier 2 inputs mapped in high-risk categories (target: ≥60% in year one).
- **Supplier Due Diligence:** Percentage of high-risk suppliers completing a recognized social compliance audit or equivalent due diligence annually (target: ≥50%).
- **Corrective Action Management:** Percentage of critical findings remediated within 90 days (target: ≥85%); average days to closure.
- **Responsible Recruitment:** Percentage of audited suppliers with zero worker-paid recruitment fees (target: 100%); number of workers reimbursed where fees identified.
- **Grievance Mechanisms:** Percentage of strategic suppliers with effective worker voice channels verified (target: ≥50%); number of substantiated cases and remediation outcomes.
- **Training Effectiveness:** Completion rates for targeted functions (target: ≥90%); post-training assessment scores; supplier training coverage.
- **Incident Management:** Number of modern slavery indicators identified; time to escalate; remediation provided to affected workers (qualitative case summaries).

## 9. Remediation and Grievance Mechanisms

We operate a whistleblowing mechanism available to all individuals (e.g., employees, contractors, vendors, customers, members of the community) and encourage suppliers to establish confidential reporting channels. Where violations are identified, we work with suppliers on corrective action, including root cause analysis, management system improvements, and follow-up verification.

Our Child Labor Remediation Policy requires age verification controls and sets out procedures to protect the best interests of the child, including removal from hazardous work, support for education continuity, and engagement with local stakeholders.

## 10. Governance, Approvals and Jurisdictional Requirements

United Kingdom (UK MSA 2015 s.54): This statement is intended to meet the expectations of the updated UK guidance and addresses the six reporting areas. It will be approved by the Executive Board (or equivalent) of Spectrum Brands (UK) Limited, signed by a director, and published on our website, with a link in in the Modern Slavery section on Spectrum Brand (UK) Limited's website (<https://www.spectrumbrands.co.uk/>), as well as added to the Home Office's Modern Slavery Statement Registry.

Canada (S-211): This report has been approved and attested by a senior officer of Empower Brands Canada, Inc. in accordance with Section 11 of the Act. Spectrum Brands' operations within Canada do not meet the minimum thresholds as set forth in the applicable law and regulations. As such, we are not required to submit a statement to the Canadian Government's Public Safety Canada portal. Nonetheless, we recognize the importance of human rights and anti-slavery commitments and have prepared this statement to align with the principles and expectations outlined in Canada's Fighting Against Forced Labor and Child Labor in Supply Chains Act

Australia (Commonwealth Modern Slavery Act 2018): Spectrum Brands' operations within Australia do not meet the minimum thresholds as set forth in the applicable law and regulations. As such, we are not required to submit a statement to the Australian Government's Modern Slavery Statements Register. Nonetheless, we recognize the importance of human rights and anti-slavery commitments and have prepared this statement to align with the principles and expectations outlined in the Commonwealth Modern Slavery Act 2018.

The Legal & Risk Mitigation and Global Sourcing teams will review progress against KPIs annually and report to the appropriate internal leadership to support informed oversight and decision-making.

## **11. Publication and Registry Submissions**

We will publish this consolidated report on Spectrum Brands' global website in a prominent location. Jurisdictional submissions will be completed through the relevant government portal, where applicable.

Empower Brands Canada, Inc.



---

Ehsan Zargar, Director

Spectrum Brands (UK) Limited



---

Benjamin Goodman, Director

Spectrum Brands Australia Pty. Ltd.



---

Timothy Lardinois, Director