

Modern Slavery and Human Trafficking Statement 2024

INTRODUCTION

Spectrum Brands EMEA 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 within its business or in our supply chain.

As part of the global company, we fully support the goals of modern slavery laws set in the Modern Slavery Act 2015 but also in California Transparency in Supply Chain Act 2010 and the Australia Modern Slavery Act 2018 (Commonwealth). The general objectives of such Acts are aligned with the way that we manage our business and supply chain, and with the principles espoused by our Board of Directors of fairness and humane treatment of all individuals around the world involved in the production and distribution of our products.

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 February 2023, effective upon approval by the Executive Board.

OUR BUSINESS AND SUPPLY CHAIN

Spectrum Brands EMEA UK Limited is part of the Spectrum Brands Inc. group of companies based in Middleton, Wisconsin, USA. We have over 10,000 employees worldwide operating in 49 countries.

Spectrum Brands Inc. is a leading global branded consumer products and home essentials company focused on driving innovation and providing exceptional customer service. Our business is organised into 4 business divisions:

- Home and Personal Care
- Home & Garden

- Global Pet Care

Spectrum Brands Inc is a leading supplier of 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.

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 is a business division of Global Pet Care. The current supply chains of Spectrum Brands operate across Asia and Europe. We operate from two UK sites; our main Head Office based in Nottingham, and a warehousing facility in Wombourne, Staffordshire. In addition we utilise a Third Party warehouse and distribution service delivered by Great Bear.

OUR POLICIES ON MODERN 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, customers, business associates and employees (“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, products or services to comply with Spectrum Brands Inc. Supplier Code of Conduct

(<https://www.spectrumbrands.com/about-us/suppliers/supplier-code-of-conduct.html>) (the “Code”). The Code, among other issues, specifically forbids the use of slavery, 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 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. The relevant account managers will monitor and enforce compliance

of the Supplier Code of Conduct. It is Spectrum Brands requirement to attach the Code to every contract which must be subsequently signed by the Supplier.

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 polices 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

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, 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.

OTHER RELEVANT POLICIES

The following policies underpin our approach to tackling Modern Slavery in our own business and our supply chain:

- Anti-Bribery Policy
- Environmental policy
- Human Rights Policy
- Policy Regarding Conflict Minerals
- Securities Holding and Trading Policy
- Code of Business Conduct and Ethics
- Whistleblowing Policy

SUPPLIERS 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.

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 on issues including, but not limited to, environmental performance, labour performance, human rights performance, modern slavery compliance, anti-corruption, product safety, compliance with product standards, quality issues, and/or customer complaints associated with the materials, products or services.

Where Spectrum Brands deems appropriate it may provide a non-compliant Supplier the opportunity to remedy the non-compliance through implementation of a corrective action 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.

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 compliant with the Modern Slavery Act 2015;
- transparent, accountable and auditable; and
- 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, and
- mitigate any risks in our supply chains.

Employees receive training on our Code and Ethics, which requires employee compliance with applicable laws and our policies. This 2-hour training is compulsory to every Spectrum Brands employee and occurs once a year. Management and relevant employees in our supply chain and

procurement functions receive training and information on slavery and human trafficking laws and best practices in risk identification, mitigation and prevention.

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. Our action plans for both our own operations and the supply chain were affected and we had to rethink our planned workstreams and focus areas to meet the challenges thrown at the business by the pandemic. We are pleased that we were able to continue to make progress throughout this very challenging period, even though this meant changing our action plans to enable us to continue to develop but in a different way e.g., more use of technology.

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
- strengthen our network of supply chain intelligence
- continually reviewing and, where necessary, updating our processes for appointing potential supply chain providers
- 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
- continuing to drive equity, diversity and inclusion across our business; and
- identifying and using opportunities for collaboration to verify and help resolve risk issues

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 2023. It was approved by the Executive Spectrum Brands EMEA UK Limited and signed by Rupert Phillips, Director of Spectrum Brands EMEA UK Limited.



Signed:

Date: November 2024

Rupert Phillips
Director
Spectrum Brands EMEA UK Limited