Spectrum Brands Inc. - Climate Change 2020



C0. Introduction

C0.1

(C0.1) Give a general description and introduction to your organization.

Spectrum Brands Holdings (SBH or our 'Company'), a member of the Russell 1000 Index, is a global and diversified consumer products company and a leading supplier of locksets, builders hardware, plumbing and accessories, 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, our Company offers a broad portfolio of market-leading, well-known and widely trusted brands. Based in Middleton, Wisconsin, Spectrum Brands Holdings generated net sales from continuing operations of approximately \$3.8 billion in fiscal 2019.

Please note that the following responses address our 2019 fiscal year: which commenced Oct 1, 2018 and ended on Sept 30, 2019

C0.2

(C0.2) State the start and end date of the year for which you are reporting data.

<not applicable=""></not>

C0.3

(C0.3) Select the countries/areas for which you will be supplying data.

Australia

Cambodia

China Colombia

Ecuador

Germany

Mexico

Netherlands

Philippines

Taiwan, Greater China

United Kingdom of Great Britain and Northern Ireland

United States of America

C0.4

(C0.4) Select the currency used for all financial information disclosed throughout your response.

USD

C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.

Operational control

C-AC0.6/C-FB0.6/C-PF0.6

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(C-AC0.6/C-FB0.6/C-PF0.6) Are emissions from agricultural/forestry, processing/manufacturing, distribution activities or emissions from the consumption of your products – whether in your direct operations or in other parts of your value chain – relevant to your current CDP climate change disclosure?

	Relevance	
Agriculture/Forestry	No	
Processing/Manufacturing	Direct operations only [Processing/manufacturing/Distribution only]	
Distribution	No	
Consumption	No	

C-AC0.6a/C-FB0.6a/C-PF0.6a

(C-AC0.6a/C-FB0.6a/C-PF0.6a) Why are agricultural/forestry activities not relevant to your current CDP climate change disclosure?

Row 1

Primary reason

Other, please specify

Please explain

Spectrum Brands does not engage in agricultural activities within its direct operations. Revenue from pet food, which is sold by Spectrum Brand's Global Pet division, constitutes 15% of Spectrum's total revenue. While agricultural activities are relevant to the upstream S3 emissions of Spectrum's Global Pet division, Spectrum utilizes animal products that would otherwise be disposed of as waste. The logistics required to collect data balancing the positive and negative emissions associated with these activities are prohibitive at this time.

C-AC0.6e/C-FB0.6e/C-PF0.6e

(C-AC0.6e/C-FB0.6e/C-PF0.6e) Why are distribution activities not relevant to your current CDP climate change disclosure?

Row 1

Primary reason

Other, please specify

Please explain

Spectrum does not engage in the distribution of agricultural or processed food products within its direct operations. Food and agriculture-related distribution is relevant to the upstream and downstream S3 emissions of Spectrum's Global Pet division. The logistics required and cost associated with collecting data on these activities are prohibitive at this time. Revenue from pet food constitutes 15% of Spectrum's total revenue.

C-AC0.6g/C-FB0.6g/C-PF0.6g

(C-AC0.6g/C-FB0.6g/C-PF0.6g) Why are emissions from the consumption of your products not relevant to your current CDP climate change disclosure?

Row 1

Primary reason

Other, please specify

Please explain

The logistics required and cost associated with collecting data on the use phase impacts of our pet food products are prohibitive at this time. Revenue from pet food constitutes 15% of Spectrum's total revenue.

C-AC0.7/C-FB0.7/C-PF0.7

(C-AC0.7/C-FB0.7/C-PF0.7) Which agricultural commodity(ies) that your organization produces and/or sources are the most significant to your business by revenue? Select up to five.

Agricultural commodity

Cattle products

% of revenue dependent on this agricultural commodity

Less than 10%

Produced or sourced

Sourced

Revenue from our Global Pet division made up approximately 23% of total revenue for the reporting year. We estimate that 15% of total revenue came from the sale of pet food with only a portion of this coming from cattle products, which amounts to less than 10% of total Spectrum revenue.

Agricultural commodity

Fish and seafood from aquaculture

% of revenue dependent on this agricultural commodity

Less than 10%

Produced or sourced

Sourced

Please explain

Revenue from our Global Pet division made up approximately 23% of total revenue for the reporting year. We estimate that 15% of total revenue came from the sale of pet food with only a portion of this coming from cattle products, which amounts to less than 10% of total Spectrum revenue.

C1. Governance

C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of

Please explain

i) Provide a description of the position(s)/committee(s) in the corporate structure and the level of responsibility they have towards climate-related issues: Our General Counsel, also a member of our Suite Officer Board Executive Group (composed of the four most Senior Executives of our Company), leads our sustainability governance efforts. As a member of our Executive Group, our General Counsel provides oversight while demonstrating Spectrum Brands Holdings' high-level commitment to sustainability ii) Explain how the responsibilities of the position(s)/committee(s) are related to climate issues: The General Counsel oversees decisions for all climate issues, sustainability goals and related resource expenditures. iii) Example of a climate-related decision: Our General Counsel was responsible for setting and approving the Spectrum Brands Holdings' 2022 sustainability goals, including the greenhouse gas reduction goal to reduce our carbon footprint (scope 1 and 2 market based emissions) 3% year over year through FY 2022 on a per-revenue basis from FY 2017.

C1.1b

(C1.1b) Provide further details on the board's oversight of climate-related issues.

with which climate- related issues are a	mechanisms into which climate-related	board- level	Please explain
some meetings	guiding strategy	<not Applicabl e></not 	Describe the governance mechanisms selected and how these mechanisms contribute to the board's overall oversight of climate-related issues: Our Board of Directors ("Board") received an annual update regarding our company's sustainability efforts and progress. As part of the update, the Board was involved in reviewing and guiding sustainability strategy, as well as reviewing and guiding risk management policies. Through this update members of the Board monitor implementation and performance of objectives related to energy and water use and product sustainability. Include what climate issues are scheduled agenda items, who briefs the board and on matters: Our General Counsel presented to the Board the status of Spectrum Brand's progress on sustainability performance objectives for energy, water, and product sustainability goals and this opportunity served as a means to receive feedback from the Board on status towards achieving climate goals.

C1.2

(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.

Name of the position(s) and/or committee(s)	Reporting line		_	Frequency of reporting to the board on climate- related issues
Other C-Suite Officer, please specify (General Counsel / Chief Sustainability Officer)	<not Applicable></not 	Both assessing and managing climate-related risks and opportunities	<not applicable=""></not>	Annually

C1.2a

(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).

- i. Our General Counsel has responsibility for the Spectrum Brands global sustainability program including setting, monitoring and managing sustainability goals. Our General Counsel, with the assistance of our dedicated EHS Team, oversees a committee-led approach that consists of senior leadership as well as dedicated cross-functional and cross-divisional teams. As part of the committee structure, the Global Sustainability Council facilitates integration of sustainability across Spectrum Brands. The committee-led approach is coordinated by representation of our General Counsel. Our EHS Team monitors climate related risks and opportunities that have the potential to affect operations and products and reports to our General Counsel.
- ii. Rationale: Our General Counsel / CSO position allows for coordination of teams across our company to deliver a shared, consistent and best-practice approach for the continuous improvement of sustainability, i.e. safety, environmental, energy/climate change, social, and governance/compliance performance. Topics of focus include: sustainability initiatives/trends, regulatory strategy, responsible sourcing, and customer sustainability programs.

C1.3

(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	

C1.3a

(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).

Entitled to incentive	Type of incentive	Activity inventivized	Comment	
All employees	Non- monetary reward	Emissions reduction target	Spectrum Brands Holdings recognizes the individual efforts of our employees who contribute to the Company's sustainability and/or reduces the energy-use therefore, cost) of our operations. Carbon footprint metrics are annually established for each facility and the progress is reported to the operations team during regional stakeholder calls, to which the leadership team is accountable.	
Other, please specify (Plant employees)	Monetary reward	Efficiency project	Plant employees within the Home & Garden and Global Pet divisions receive monetary bonuses in exchange for increasing changeover efficiency as well as for enacting behavioral and process changes that reduce energy use. Increased changeover efficiency leads to reduced energy and emissions intensities in operations. Other divisions do not use this system because it is not relevant to their business operations.	
	Monetary reward	Efficiency project	Facility managers within the Home & Garden and Global Pet divisions receive monetary bonuses in exchange for increasing changeover efficiency as well as for enacting behavioural and process changes that reduce energy use. Increased changeover efficiency leads to reduced energy and emissions intensities in operations. Other divisions do not use this system because it is not relevant to their business operations.	
Other, please specify (Operational sites)	Non- monetary reward	Efficiency project	Each operational site has performance goals for reaching scrap waste reduction goals. Reductions in scrap waste also reduce the company's scope 3 emissions.	

C2.	Risks	and	op	porti	unities

C2.1

(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities? Yes

C2.1a

(C2.1a) How does your organization define short-, medium- and long-term time horizons?

	From (years)	To (years)	Comment
Short-term	0	3	
Medium-term	3	5	
Long-term	5	10	

C2.1b

(C2.1b) How does your organization define substantive financial or strategic impact on your business?

For the purposes of Spectrum Brands global Enterprise Risk Management (ERM) process, we define risks that have a 'substantive financial or strategic impact' at the corporate level as having an impact of greater than 15% of EBITDA as an isolated event or a combination of factors impacting the achievement of corporate strategy.

C2.2

(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

Value chain stage(s) covered

Direct operations

Upstream

Downstream

Risk management process

Integrated into multi-disciplinary company-wide risk management process

Frequency of assessment

Annually

Time horizon(s) covered

Short-term

Description of process

At the company level, Spectrum Brands Holdings has a risk management process that identifies and prioritizes risks to the company that could have a strategic impact. Risks that have the potential to be material are disclosed on the Spectrum Brands public reports to the SEC and include statements associated with climate change risk. In addition, for climate change related risks, the sustainability committee identifies risks associated with energy and water resource scarcity and extreme weather occurrences that have potential to disrupt operational and/or supply chain performance and impact product sales. The materiality risk assessment process also includes prioritization on addressing the risks that offer the greatest business harm or liability. Direct Operations (Physical Risk Example): Our facilities are subject to various hazards associated with the manufacturing, handling, storage, and transportation of chemical materials and products, including human error, leaks and ruptures, explosions, floods, fires, inclement weather and natural disasters, power loss or other infrastructure failures, mechanical failure, unscheduled downtime, regulatory requirements, the loss of certifications, technical difficulties, labor disputes, inability to obtain materials, equipment or transportation, environmental hazards such as remediation, chemical spills, discharges or releases of toxic or hazardous substances or gases, and other risks. Many of these hazards could cause personal injury and loss of life, severe damage to, or destruction of, property and equipment and environmental contamination. In addition, the occurrence of material operation problems at our facilities due to any of these hazards could cause a disruption in the production of products. The Company's insurance policies have coverage in case of significant damage to its manufacturing facilities but may not fully compensate for the cost of replacement for any such damage and any loss from business interruption. Divisional leadership is responsible for risk management within operations at the division level. This involves identification and prioritization of risks to each facility. Some SBH facilities are located in areas prone to extreme weather events such as flooding or ice storms. Our Divisional Operations team considers these acute physical risks as they affect the division's daily operations and strategy to mitigate and manage extreme weather events. Upstream Example: Risk in the supply chain is addressed by a sourcing risk management framework and includes assessing a supplier's ability to perform in terms of quality, delivery, and sustainability issues. This framework includes identifying the potential size and scope of the risks on the supply chain. SBH applies the sourcing risk management framework to the product design functions at the company, which will include product specific sustainability topics such as resource scarcity, and continuity of resources. Emissions intensity of products is also considered as part of the framework. The global sourcing risk management procedure is implemented at the division level and used to assess supplier's performance and risk, which may vary during supplier initiation, maintenance, renewal and interim changes through and to contract end. Elements of performance and risk included in the procedure include: financial, quality, EHS, sustainability, and the social license to operate and distribute the product. Downstream (Transitional Risk) Example: Risks such as emerging regulations and reputational concerns can have an impact on our stakeholders - in particular, our customers. Our product teams evaluate downstream impacts, and strive to develop safer products, eliminate unneeded chemicals, and improve cradle-to-grave management of products and packaging. Our approach focuses on both regulatory compliance and conformity with emerging customer and consumer requirements. As part of the potential downstream risks identified through the risk management framework, in 2019 we provided additional disclosure of ingredients from formulated products and article type goods to our retailer customers through the UL WERCSmart platform.

C2.2a

(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance & inclusion	Please explain	
Current regulation	Relevant, always included	At SBH our formal mechanism for assessing regulations is through the Regulatory Advisory Council. The Council is sponsored by a representative from SBH legal department and is global in scale. The Council is charged with identifying new/emerging requirements, predominantly associated with governmental, customer policy or internal initiatives that could affect plant or product, including current environmental regulations. An example current regulation would be the European Emission Trading System (ETS).	
Emerging regulation	Relevant, always included	At SBH our formal mechanism for assessing regulations is through the Regulatory Advisory Council. The Council is sponsored by a representative from SBH legal department and is global in scale. The Council is charged with identifying newlemerging requirements, predominantly associated with governmental, customer policy or internal initiatives that could affect plant or product, including new and emerging environmental regulations. For example, several proposed carbon regulatory schemes have been under consideration recently in the US, such as the Consensus Climate Solution from the Climate Leadership Council.	
Technology	sometimes included	Our Regulatory Advisory Council is charged with identifying new/emerging requirements, predominantly associated with governmental, customer policy or internal initiatives that could affect plant or product. When appropriate, the Regulatory Advisory Council will engage divisional IT departments when technology is an affected element of the Council's assessment. Example technology risks would be the desire to shift towards lower carbon-intensity feedstock materials in our products that will have different performance criteria thus requiring substantial testing and consideration prior to selection.	
Legal	Relevant, always included	Regulatory, and thereby legal risks are consistently evaluated by the Regulatory Advisory Council and may be informed by climate-related issues. For example: legal risks may include revisions to existing emission-related requirements (such as revision to European Union Emissions Trading Scheme for greenhouse gases.	
Market	Relevant, sometimes included	Through the sourcing risk management framework described above in 2.2, SBH has added to the supplier procurement process an evaluation of EHS and social risk focused on mitigating risks to the business and market risk from supplier nonconformance. For example, customer and retail partner carbon performance expectations continue to increase.	
Reputation	Relevant, always included	For SBH reputation is often tied to the use of our products. Our product teams are constantly innovating products to provide the quality, value, and performance our customers demand, while protecting health, safety, and wellness, and minimizing our environmental impacts. An example of climate-related reputation risk would be a news event that negatively affects one of our product categories, potentially allowing key stakeholders such as customers or employees to draw an incorrect conclusion regarding our products.	
Acute physical		Operational risks at the plant level are consistently evaluated and may be informed by climate-related issues. For example, some facilities are located in areas prone to extreme weather events such as flooding or ice storms. Our Divisional Operations team is an example of one risk owner that would consider these acute physical risks as they affect the division's daily operations and strategy to mitigate and manage extreme weather events.	
Chronic physical		Operational risks are consistently evaluated and may be informed by climate-related issues. For example, facilities are located in areas prone to rising average temperatures. Our facility managers are an example of a risk owner that would consider these chronic physical risks as they affect the division's daily operations and strategy to manage for these rising temperatures.	

Yes

C2.3a

(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.

Identifier

Risk 1

Where in the value chain does the risk driver occur?

Direct operations

Risk type & Primary climate-related risk driver

Emerging regulation Carbon pricing mechanisms

Primary potential financial impact

Increased indirect (operating) costs

Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

Company-specific description

Proposed international accords and treaties, as well as federal, state and local laws and regulations, may attempt to control or limit the causes of climate change in the future, including the effect of greenhouse gas emissions on the environment. In the event that the U.S. government or foreign governments enact new climate change laws or regulations or make changes to existing laws or regulations, compliance with applicable laws or regulations may result in increased manufacturing costs for our products, such as by requiring investment in new pollution control equipment or changing the ways in which certain of our products are made. Spectrum Brands may incur some of these costs directly and others may be passed on to us from our third-party suppliers. Being alert to changing regulations and taking proactive measures may provide a competitive advantage.

Time horizon

Medium-term

Likelihood

Likely

Magnitude of impact

Medium

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial implications may be negative but could be offset by gaining a competitive advantage. We are looking to build a process to quantify the financial impacts in the next few years.

Cost of response to risk

Description of response and explanation of cost calculation

The sustainability committee and councils meet regularly to provide updates on incoming climate change-related requests and ongoing projects and implications of internal and external factors. External factors, for example, include the UN Environmental Programme Sustainable Buildings; and Sustainable Real Estate.

Comment

The costs associated with managing this risk are significant and part of existing operating controls. These costs include annual salaries of employees that manage operations, our global EHS and Sustainability teams, our global legal team, and costs for consultants that the company utilizes to validate and calculate our emissions and various public disclosure reporting.

Identifier

Risk 2

Where in the value chain does the risk driver occur?

Upstream

Risk type & Primary climate-related risk driver

Acute physical Increased severity and frequency of extreme weather events such as cyclones and floods

Primary potential financial impact

Increased indirect (operating) costs

Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

Company-specific description

Increasing severe weather occurrence rate, driven by climate change, forces Spectrum Brands to consider supply chain preparedness for these events.

Time horizon

Short-term

Likelihood

About as likely as not

Magnitude of impact

Medium

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial implications may be negative.

Cost of response to risk

Description of response and explanation of cost calculation

SBH is regularly assessing its supply chain to strengthen response to potential changes in climate. The Global Sustainability Committee has the responsibility to manage this risk. For example, the Committee oversees how the following are captured into organizational planning: ensuring proper insurance coverages, facility readiness (emergency preparedness), and supplier coordination in the event of heightened risk.

Comment

The costs are related to risk assessments and logistical improvements.

Identifier

Risk 3

Where in the value chain does the risk driver occur?

Downstream

Risk type & Primary climate-related risk driver

Chronic physical Rising mean temperatures

Primary potential financial impact

Decreased revenues due to reduced demand for products and services

Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

Company-specific description

Increased global temperatures may cause regional ecological changes, such as unusual drought or precipitation patterns. These climate shifts may naturally prevent weed growth, which would reduce the demand for Spectrum Brands' herbicide products and present a financial risk to the company.

Time horizon

Unknown

Likelihood

Unlikely

Magnitude of impact

Low

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial implications may be negative.

Cost of response to risk

Description of response and explanation of cost calculation

The sustainability committee and councils meet regularly to provide updates on incoming climate change-related requests and how this could impact our products.

Commen

The costs associated with managing this risk are significant and part of existing operating controls. These costs include annual salaries of employees that manage operations, our global EHS and Sustainability teams, our global legal team, and costs for consultants that the company utilizes to validate and calculate our emissions and

Identifier

Risk 4

Where in the value chain does the risk driver occur?

Direct operations

Risk type & Primary climate-related risk driver

Reputation

Shifts in consumer preferences

Primary potential financial impact

Decreased revenues due to reduced demand for products and services

Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

Company-specific description

As more consumers choose to support brands with strong environmental credentials, we expect to further enhance our commitment to the environment and sustainability and if we succeed, could incur positive impacts to its reputation.

Time horizon

Short-term

Likelihood

Likely

Magnitude of impact

Low

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial implications may be positive.

Cost of response to risk

0

Description of response and explanation of cost calculation

The sustainability committee and councils meet regularly to provide updates on incoming climate change-related requests and ongoing projects. Furthermore, by reporting to CDP and the Walmart Sustainability Index, SBH is showing its commitment to emissions reductions and climate change initiatives. Additionally, SBH has sustainability goals related to: emissions reductions, product sustainability, water savings, health and safety, and partnerships.

Comment

The costs associated with managing this risk are significant and part of existing operating controls. These costs include annual salaries of employees that manage operations, our global EHS and Sustainability teams, our global legal team, and costs for consultants that the company utilizes to validate and calculate our emissions and various public disclosure reporting.

C2.4

(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?

Yes

C2.4a

(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.

Identifier

Opp1

Where in the value chain does the opportunity occur?

Direct operations

Opportunity type

Energy source

Primary climate-related opportunity driver

Use of supportive policy incentives

Primary potential financial impact

Reduced indirect (operating) costs

Company-specific description

Spectrum Brands Holdings' has identified an opportunity in the process surrounding the broad range of potential regulations relating to climate emissions. Agencies such as the Environmental Protection Agency and a host of other organizations at the local, state, national, and international level will implement a policy that directly or indirectly creates a price for greenhouse gas emissions. Spectrum Brands Holdings' has identified an opportunity in pre-emptively measuring, managing, and reducing greenhouse gas emissions as it will be better positioned, to adhere to future regulations.

Time horizon

Medium-term

Likelihood

More likely than not

Magnitude of impact

Medium

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial implications may be positive.

Cost to realize opportunity

Strategy to realize opportunity and explanation of cost calculation

At the divisional level, the Program Manager and Director of Quality meet quarterly with senior leadership, which includes the Senior Vice President and General Manager, the Vice President of Research and Development, and the Sales and Operations team, to provide updates on incoming climate change-related requests and ongoing projects.

Comment

The costs associated with managing this risk are significant and part of existing operating controls. These costs include annual salaries of employees that manage operations, our global EHS and Sustainability teams, our global legal team, and costs for consultants that the company utilizes to validate and calculate our emissions and various public disclosure reporting.

Identifier

Opp2

Where in the value chain does the opportunity occur?

Direct operations

Opportunity type

Products and services

Primary climate-related opportunity driver

Development of climate adaptation, resilience and insurance risk solutions

Primary potential financial impact

Increased revenues resulting from increased demand for products and services

Company-specific description

In some areas, increased precipitation associated with climate change may cause pest population growth. This may increase the demand for our products. Additionally, we expect increased demand in reconstruction for hardware and appliance products due to increased frequency and severity of natural disasters.

Time horizon

Short-term

Likelihood

More likely than not

Magnitude of impact

Medium-low

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial implications may be positive.

Cost to realize opportunity

Strategy to realize opportunity and explanation of cost calculation

The sustainability committee and councils meet regularly to provide updates on incoming climate change-related requests and ongoing projects.

Comment

The costs associated with managing this risk are significant and part of existing operating controls. These costs include annual salaries of employees that manage operations, our global EHS and Sustainability teams, our global legal team, and costs for consultants that the company utilizes to validate and calculate our emissions and various public disclosure reporting.

Identifier

Opp3

Where in the value chain does the opportunity occur?

Downstream

Opportunity type

Products and services

Primary climate-related opportunity driver

Shift in consumer preferences

Primary potential financial impact

Increased revenues resulting from increased demand for products and services

Company-specific description

Employee and customer awareness towards climate change continues to increase. Promoting environmental activities and more sustainable products will improve our image and potentially increase sales.

Time horizon

Short-term

Likelihood

Likely

Magnitude of impact

Medium

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact figure

A large number of consumers are environmentally-conscious. If sales increase due to gained consumers' support, estimated financial gains may be significant.

Cost to realize opportunity

Strategy to realize opportunity and explanation of cost calculation

The sustainability committee and councils meet regularly to provide updates on incoming climate change-related requests and ongoing projects. Furthermore, by reporting to CDP and disclosing emissions, Spectrum Brands Holdings is showing its commitment to emissions reductions and climate change initiatives. Additionally, our sourcing, procurement, and product development teams are encouraged to move beyond compliance to improve product design and packaging from a sustainability perspective.

Comment

The costs associated with managing this risk are significant and part of existing operating controls. These costs include annual salaries of employees that manage operations, our global EHS and Sustainability teams, our global legal team, and costs for consultants that the company utilizes to validate and calculate our emissions and various public disclosure reporting.

Identifier

Opp4

Where in the value chain does the opportunity occur?

Downstream

Opportunity type

Products and services

Primary climate-related opportunity driver

Shift in consumer preferences

Primary potential financial impact

Increased revenues resulting from increased demand for products and services $% \left(1\right) =\left(1\right) \left(1$

Company-specific description

Major purchasing organizations are responding to the financial and regulatory risks associated with climate change by more closely monitoring their supply chains' greenhouse gas emissions. Many retailers have started to give preference to suppliers that measure, disclose, and reduce their impact. SBH is aggressively monitoring and disclosing its emissions which will provide a competitive advantage with buyers that prioritize transparency and compliance.

Time horizon

Short-term

Likelihood

Likely

Magnitude of impact

High

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial implications may be positive.

Cost to realize opportunity

Strategy to realize opportunity and explanation of cost calculation

The sustainability committee and councils meet regularly to provide updates on incoming climate change-related requests and ongoing projects. Furthermore, by reporting to CDP and disclosing emissions, Spectrum Brands is showing its commitment to emissions reductions and climate change initiatives.

Comment

The costs associated with managing this risk are significant and part of existing operating controls. These costs include annual salaries of employees that manage operations, our global EHS and Sustainability teams, our global legal team, and costs for consultants that the company utilizes to validate and calculate our emissions and various public disclosure reporting.

C3. Business Strategy

C3.1

(C3.1) Have climate-related risks and opportunities influenced your organization's strategy and/or financial planning?

Yes

C3.1a

(C3.1a) Does your organization use climate-related scenario analysis to inform its strategy?

No, but we anticipate using qualitative and/or quantitative analysis in the next two years

C3.1c

(C3.1c) Why does your organization not use climate-related scenario analysis to inform its strategy?

Spectrum Brands Holdings does not currently utilize forward-looking scenario analyses associated with climate change to inform our strategy and financial planning; however we are putting processes in place. We are currently setting the stage in order to take on climate scenario planning in the short term. For example, we are in the process of understanding the climate change risk and impact on our property and businesses by working with our insurers globally.

C3.1d

(C3.1d) Describe where and how climate-related risks and opportunities have influenced your strategy.

	Have climate- related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	i) A description of how your strategy in this area has been influenced by climate-related risks and opportunities: The identified opportunity reported in 2.4a (increased demand for more sustainable products) has affected our approach to designing our products in that our sourcing, procurement, and product development teams are encouraged to move beyond compliance to improve product design and packaging from a sustainability perspective. ii) Strategy time horizon(s): At the division level products are typically reviewed annually for opportunities to move beyond compliance to improve product design and packaging from a sustainability perspective. iii) Most substantial strategic decisions to date: Due to a changing consumer perception around the environmental effects of single use plastics, Remington has made efforts to move away from the use of these components in our packaging. To do this we needed to find alternative materials such as paper-based components like molded pulp to replace plastic based components, without adding cost. A prime example of this is our shave and groom items where we've decided to move away from using plastic windows and blisters. Model PG6155 is a good example where we decided to move away from plastic components to a closed litho box. By removing the plastic components from just one gift box, we save 77.5 g (0.171 lbs.) of plastic from entering the waste stream for each package disposed of. Implementing small changes like this can have huge upside environmental potential due the scale of volume we sell into stores. As we roll out this change and changes like it, we anticipate seeing a large reduction in single use plastics in our shave and groom categories.
Supply chain and/or value chain	Yes	i. A description of how your strategy in this area has been influenced by climate-related risks and opportunities: The opportunities opportunity reported in 2.4a (proactively collecting GHG data) has affected our supply chain/value chain activities, particularly with regard to engaging our suppliers to achieve our sustainability goals related to performance on the Walmart THESIS. ii. Strategy time horizon(s) At the corporate level, emissions and results from supplier surveys are collected and reviewed annually. iii. Most substantial strategic decisions to date: For the past 4 years we have invested in surveying our supply chain on various sustainability topics (GHG emissions, sustainable packaging, etc.) to respond to the Walmart THESIS platform. In 2019, Spectrum surveyed 330 unique Tier 1- Tier 3 supplies. As a result of collecting and reporting on both internal and supply chain practices, Spectrum increased it's company-wide average for reporting to THESIS for the 4th consecutive year. Spectrum performed particularly well on manufacturing and supply chain greenhouse gas emissions, manufacturing and supply chain worker health & safety, priority chemicals disclosure, transportation to retailers, product design, and conflict minerals KPIs.
Investment in R&D	Yes	i) A description of how your strategy in this area has been influenced by climate-related risks and opportunities: Opportunity 3 as reported in section 2.4a (shift in consumer preferences) has affected Spectrum Brands Holdings investment in R&D to design our products in that our sourcing, procurement, and product development teams to encouraged to move beyond compliance to improve product design and packaging from a sustainability perspective. ii) Strategy time horizon(s) At the division level products are typically reviewed at least annually for opportunities to move beyond compliance to improve product design and packaging from a sustainability perspective. iii) Most substantial strategic decisions to date. For example, the Hardware and Home Improvement division R&D team was challenged to design a showerhead that flows 1.8 GPM but feels like a showerhead flowing 2.5 GPM. The team studied many different ways to achieve this and ultimately developed a new patented technology that creates larger water droplets that retain the heat in the water longer ultimately making it feel like there is more water flowing than is actually occurring. • Original flow rate requirements were 2.5 GPM. • New EPA/Water sense requirements is 2.0 GPM • We designed the product to be 1.75 -1.8 GPM as marketed. This new patented technology creates larger water droplets and at the result is lower flow but for the customer, the shower feels like there is more flow.
Operations	Yes	i) A description of how your strategy in this area has been influenced by climate-related risks and opportunities: Physical and transitional climate risks and opportunities as described in 2.3a/2.4a have affected our operations, particularly with regard to implementing projects that support our progress toward achieving sustainability goals (energy, water, waste) while saving on operational costs. ii) Strategy time horizon(s) At the division level operations are typically reviewed annually for opportunities for energy efficiency and GHG reduction opportunities. iii) Most substantial strategic decisions to date: For example to decrease the waste footprint from manufacturing, our Global Pet division in Blacksburg, VA devised a process to reuse scrap metal from the filter cartridge manufacturing process: Also, in Blacksburg, VA Filter Cartridge Manufacturing Process Generated Approx. 100 Pounds of Floss Scrap Daily. Previously, the material was discarded in a landfill as waste. That's 25,000 pounds each year. As such, the team worked to identify a new way to recycle the floss scrap to reduce waste and reduce emissions associated with landfilled waste. The scrap floss is now collected and shipped to Morrell targets in Alma, Arkansas. The floss scrap is used as a filler material for youth archery targets. Overall, this equals 25,000 lbs per year reduction in floss scrap/refuse for the facility.

C3.1e

(C3.1e) Describe where and how climate-related risks and opportunities have influenced your financial planning.

	Financial planning elements that have been influenced	Description of influence
Row 1	Direct costs Capital expenditures	i) The identified risks and opportunities reported in 2.3a and 2.4a have affected operating costs based on our ongoing investment toward more sustainable products and efficient facilities to reduce our environmental impacts and emissions. ii) Additionally capital expenditures have been influenced by choices related to remediation options that have differing GHG impacts. For example at the Macon, MO site, we are going to utilize an in situ thermalization method to break down the contaminants versus excavating soil and placing in a landfill or incinerating the soil. This will be less harmful to the environmental and reduce remediation cost for the company by approximately \$1M in addition to having a lower GHG impact from not transporting soil for treatment and or incineration.

C3.1f

(C3.1f) Provide any additional information on how climate-related risks and opportunities have influenced your strategy and financial planning (optional).

C4. Targets and performance

C4.1

(C4.1) Did you have an emissions target that was active in the reporting year? Intensity target

C4.1b

CDP

(C4.1b) Provide details of your emissions intensity target(s) and progress made against those target(s).

Target reference number

Int 1

Year target was set

2017

Target coverage

Company-wide

Scope(s) (or Scope 3 category)

Scope 1+2 (market-based)

Intensity metric

Metric tons CO2e per unit revenue

Base year

2017

Intensity figure in base year (metric tons CO2e per unit of activity)

0.0000299

% of total base year emissions in selected Scope(s) (or Scope 3 category) covered by this intensity figure

100

Target year

2022

Targeted reduction from base year (%)

16.45

Intensity figure in target year (metric tons CO2e per unit of activity) [auto-calculated]

0.00002498145

% change anticipated in absolute Scope 1+2 emissions

-0.5

% change anticipated in absolute Scope 3 emissions

Intensity figure in reporting year (metric tons CO2e per unit of activity)

0.0000308

% of target achieved [auto-calculated]

-18.2980756523773

Target status in reporting year

Underway

Is this a science-based target?

No, and we do not anticipate setting one in the next 2 years

Please explain (including target coverage)

Years noted reflect Spectrum Brands Holdings' fiscal years. Our goal is to reduce our carbon footprint (scope 1 and 2 market based emissions) 3% year over year through FY 2022 on a per revenue basis from a FY 2017 baseline.

C4.2

(C4.2) Did you have any other climate-related targets that were active in the reporting year?

No other climate-related targets

C4.3

(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Yes

C4.3a

(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	4	515
To be implemented*	2	2001
Implementation commenced*	2	124
Implemented*	17	4618
Not to be implemented	0	0

(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.

Initiative category & Initiative type

Energy efficiency in production processes

Process optimization

Estimated annual CO2e savings (metric tonnes CO2e)

107

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Mandatory

Annual monetary savings (unit currency – as specified in C0.4)

1 2 2 2 1

Investment required (unit currency - as specified in C0.4)

10000

Payback period

1-3 years

Estimated lifetime of the initiative

6-10 years

Comment

Improve communications between boilers to optimize utilization

Initiative category & Initiative type

Energy efficiency in buildings

Lighting

Estimated annual CO2e savings (metric tonnes CO2e)

600

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Mandatory

Annual monetary savings (unit currency – as specified in C0.4)

41300

Investment required (unit currency - as specified in C0.4)

400000

Payback period

1-3 years

Estimated lifetime of the initiative

16-20 years

Comment

Initiative category & Initiative type

Energy efficiency in production processes

Compressed air

Estimated annual CO2e savings (metric tonnes CO2e)

85

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Mandatory

Annual monetary savings (unit currency – as specified in C0.4)

4237

Investment required (unit currency – as specified in C0.4)

30000

Payback period

4-10 years

Estimated lifetime of the initiative

Comment

Initiative category & Initiative type

Energy efficiency in production processes

Smart control system

Estimated annual CO2e savings (metric tonnes CO2e)

188.61

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

24000

Investment required (unit currency - as specified in C0.4)

20000

Payback period

<1 year

Estimated lifetime of the initiative

6-10 years

Comment

Initiative category & Initiative type

Energy efficiency in production processes

Machine/equipment replacement

Estimated annual CO2e savings (metric tonnes CO2e)

720

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

550

Investment required (unit currency - as specified in C0.4)

5129

Payback period

4-10 years

Estimated lifetime of the initiative

11-15 years

Comment

Complete payback in estimated in 7 or less

Initiative category & Initiative type

Energy efficiency in production processes

Waste heat recovery

Estimated annual CO2e savings (metric tonnes CO2e)

124

Scope(s)

Scope 1

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

60000

Investment required (unit currency - as specified in C0.4)

50000

Payback period

<1 year

Estimated lifetime of the initiative

3-5 years

Comment

Initiative category & Initiative type

Energy efficiency in buildings

Estimated annual CO2e savings (metric tonnes CO2e)

25.93

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

3087

Investment required (unit currency - as specified in C0.4)

0

Payback period

<1 year

Estimated lifetime of the initiative

3-5 years

Comment

Subic, Basic energy conservation initiative to used lower light wattages

Initiative category & Initiative type

Energy efficiency in production processes Process optimization

Estimated annual CO2e savings (metric tonnes CO2e)

129.63

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

26957

Investment required (unit currency - as specified in C0.4)

0

Payback period

<1 year

Estimated lifetime of the initiative

3-5 years

Comment

Subic, More Safer and Less Hazardous Gas on the process

Initiative category & Initiative type

Waste reduction and material circularity

Waste reduction

Estimated annual CO2e savings (metric tonnes CO2e)

6.54

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

21000

Investment required (unit currency - as specified in C0.4)

0

Payback period

<1 year

Estimated lifetime of the initiative

3-5 years

Comment

Subic, Reduction of wastewater that needs to be treated as it passed the effluent quality requirement.

Transportation Company fleet vehicle efficiency

Estimated annual CO2e savings (metric tonnes CO2e)

31.05

Scope(s)

Scope 1

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

17143

Investment required (unit currency - as specified in C0.4)

34200

Payback period

1-3 years

Estimated lifetime of the initiative

>30 years

Comment

Initiative category & Initiative type

Energy efficiency in buildings Motors and drives

Estimated annual CO2e savings (metric tonnes CO2e)

218.31

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

37628

Investment required (unit currency – as specified in C0.4)

62000

Payback period

1-3 years

Estimated lifetime of the initiative

3-5 years

Comment

Initiative category & Initiative type

Energy efficiency in production processes Reuse of water

Estimated annual CO2e savings (metric tonnes CO2e)

156.41

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

139330

Investment required (unit currency - as specified in C0.4)

232000

Payback period

1-3 years

Estimated lifetime of the initiative

3-5 years

Comment

Initiative category & Initiative type

Energy efficiency in buildings Building Energy Management Systems (BEMS)

Estimated annual CO2e savings (metric tonnes CO2e)

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

Investment required (unit currency - as specified in C0.4)

Payback period

1-3 years

Estimated lifetime of the initiative

3-5 years

Comment

Initiative category & Initiative type

Energy efficiency in buildings

Building Energy Management Systems (BEMS)

Estimated annual CO2e savings (metric tonnes CO2e)

1722.08

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

151202

Investment required (unit currency - as specified in C0.4)

150000

Payback period

<1 year

Estimated lifetime of the initiative

3-5 years

Comment

Initiative category & Initiative type

Energy efficiency in buildings

Other, please specify (Add dryer to air compressors)

Estimated annual CO2e savings (metric tonnes CO2e)

220.55

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

32230

Investment required (unit currency - as specified in C0.4)

12000

Payback period

<1 year

Estimated lifetime of the initiative

3-5 years

Comment

Initiative category & Initiative type

Company policy or behavioral change

Resource efficiency

Estimated annual CO2e savings (metric tonnes CO2e)

191.97

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

25690

Investment required (unit currency - as specified in C0.4)

37140

Payback period

1-3 years

Estimated lifetime of the initiative

Ongoing

Comment

Initiative category & Initiative type

Energy efficiency in production processes Machine/equipment replacement

Estimated annual CO2e savings (metric tonnes CO2e)

22 27

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in C0.4)

11910

Investment required (unit currency - as specified in C0.4)

11420

Payback period

<1 year

Estimated lifetime of the initiative

6-10 years

Comment

C4.3c

(C4.3c) What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Compliance with regulatory requirements/standards requirements/standards recompany evaluates both the end goal of achieving year-on-year improvements.	
Financial optimization calculations Spectrum Brands Holdings constantly investigates and reviews opportunities to reduce the environmental impacts and carbon footprint associated with the company's coperations and products. When opportunities to reduce emissions and improve energy efficiency emerge, the company evaluates both the economic and environmental projects, with the end goal of achieving year-on-year improvements.	
Employee engagement	Spectrum Brands Holdings constantly investigates and reviews opportunities to reduce the environmental impacts and carbon footprint associated with the company's day-to-day operations and products. When opportunities to reduce emissions and improve energy efficiency emerge, the company evaluates both the economic and environmental impacts of such projects, with the end goal of achieving year-on-year improvements.

C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?

C5. Emissions methodology

C5.1

(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).

Scope 1

Base year start

October 1 2016

Base year end

September 30 2017

Base year emissions (metric tons CO2e)

30916.56

Comment

In January 2019, Spectrum Brands Holdings divested its Global Battery & Lighting (GBL) and Global Auto Care (GAC) divisions. As such we have updated our base year to FY17 from FY16. We removed emissions associated with the GBL and GAC divisions from our FY17 and FY18 inventory to align with our company's current organizational structure.

Scope 2 (location-based)

Base year start

October 1 2016

Base year end

September 30 2017

Base year emissions (metric tons CO2e)

80662.95

Comment

In January 2019, SBH divested its Global Battery & Lighting (GBL) and Global Auto Care (GAC) divisions. We removed emissions associated with the GBL and GAC divisions from our FY17 and FY18 inventory to align with our company's current organizational structure.

Scope 2 (market-based)

Base year start

October 1 2016

Base year end

September 30 2017

Base year emissions (metric tons CO2e)

80036.77

Comment

In January 2019, Spectrum Brands Holdings divested its Global Battery & Lighting (GBL) and Global Auto Care (GAC) divisions. As such we have updated our base year to FY17 from FY16. We removed emissions associated with the GBL and GAC divisions from our FY17 and FY18 inventory to align with our company's current organizational structure.

C5.2

(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

C6. Emissions data

C6.1

(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

Gross global Scope 1 emissions (metric tons CO2e)

37986

Start date

<Not Applicable>

End date

<Not Applicable>

Comment

C6.2

(C6.2) Describe your organization's approach to reporting Scope 2 emissions.

Row 1

Scope 2, location-based

We are reporting a Scope 2, location-based figure

Scope 2, market-based

We are reporting a Scope 2, market-based figure

Comment

C6.3

(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

Scope 2, location-based

78235

Scope 2, market-based (if applicable)

78982

Start date

<Not Applicable>

End date

<Not Applicable>

Comment

C6.4

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

Yes

C6.4a

(C6.4a) Provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure.

Source

Sales Offices

Relevance of Scope 1 emissions from this source

Emissions are relevant but not yet calculated

Relevance of location-based Scope 2 emissions from this source

Emissions are relevant but not yet calculated

Relevance of market-based Scope 2 emissions from this source (if applicable)

Emissions are relevant but not yet calculated

Explain why this source is excluded

The logistics required and cost associated with collecting this data are prohibitive at this time

C6.5

(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Capital goods

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Fuel-and-energy-related activities (not included in Scope 1 or 2)

Evaluation status

Relevant, calculated

Metric tonnes CO2e

6122

Emissions calculation methodology

Location -based emissions from electricity transmission and distribution (T&D) losses were calculated by multiplying electricity consumption (international facilities) or electricity emissions (US facilities) by the T&D loss rate in accordance with the GHG Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) and the GHG Protocol Technical Guidance for Calculating Scope 3 Emissions (Version 1.0). Emission factors for the US are from US EPA, Emission Factors for Greenhouse Gas Inventories, Table 6 Electricity (eGRID2018), January 2020. GWPs from the IPCC Fifth Assessment Report (AR5 - 100 year) were applied. T&D loss rates for the US are from US Energy Information Administration (EIA), "State Electricity Profiles," Table 10. Supply and disposition of electricity, 1990-2017 (megawatthours), Data for 2018 February 26, 2019 (https://www.eia.gov/electricity/state/), and international T&D loss rates are from the International Energy Agency (IEA), "CO2 Emissions from Fuel Combustion," 2019 Edition, Year 2017 Data.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

Please explain

Upstream transportation and distribution

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Waste generated in operations

Evaluation status

Relevant, calculated

Metric tonnes CO2e

8642

Emissions calculation methodology

Solid waste emissions (hazardous and non-hazardous waste to landfill, recycling) were calculated by multiplying the mass of waste by the appropriate emission factor (EF) based on the waste treatment method and waste type. Hazardous waste was assumed to be general hazardous waste sent to landfill, non-hazardous waste to landfill was assumed to be mixed municipal solid waste (MSW), and potential waste material recycled/reused/recovered was assumed to be 100% mixed recyclables. Waste EFs should include end-of-life processes only, adapted from US EPA, "Waste Reduction Model (WARM)," Version 14, February 2016

(https://www.epa.gov/warm/documentation-chapters-greenhouse-gas-emission-and-energy-factors-used-waste-reduction-model). Landfill EFs only include non-biogenic emissions associated with landfilling and transportation (https://www.epa.gov/sites/production/files/2016-03/documents/warm_v14_management_practices.pdf). Recycling EFs only include non-biogenic emissions associated with transportation to the recycling facility (http://epa.gov/epawaste/conserve/tools/warm/pdfs/Recycling.pdf). Emissions associated with water, sewage and other systems were calculated using Carnegie Mellon's Economic Input-Output Life Cycle Assessment US 2002 Purchaser Price Model (http://www.eiolca.net/cgi-bin/dft/use.pl?newmatrix=US428PURCH2002). FY19 water withdrawal costs were adjusted for inflation using the CPI Inflation Calculator (http://cpiinflationcalculator.com/). GWPs from the IPCC Fifth Assessment Report (AR5 - 100 year) were applied.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Business travel

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Employee commuting

Evaluation status

Relevant, calculated

Metric tonnes CO2e

19792

Emissions calculation methodology

SBH collected commute data from employees via a commute and travel survey requesting distance traveled to and from work in an average week in 2019 for the following transport methods: public transit and alternative methods - walk/bike, transit rail, intercity rail, bus, and ferry/boat; vehicle transit - car, truck or SUV, and motorcycle (also requested fuel type for car, truck or SUV, and motorcycle transport). 2334 of 8599 employees responded to the survey with usable data. One-way commute distances as well as the number of commute days traveled in an average week were recorded. Distances traveled were multiplied by an assumed 50 weeks per year. Per-person distances traveled by each transport method were calculated by division and applied to the 6265 employees that did not respond to the survey, with half the per person distances being applied to "Other" employee types (including temp, seasonal, intern, casual, contract, etc.). Employee commuting emissions were then calculated by multiplying total miles traveled by the appropriate emission factor and global warming potential in accordance with the GHG Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) and the GHG Protocol Technical Guidance for Calculating Scope 3 Emissions (Version 1.0). Emission factors from EPA, "Emission Factors for Greenhouse Gas Inventories 2020," Table 2 Mobile Combustion CO2 Emission Factors, Table 3 Mobile Combustion CH4 and N2O Emission Factors for On-road Diesel and Alternative Fuel Vehicles, and Table 10 Scope 3 Category 6: Business Travel and Category 7: Employee Commuting Emission Factors, 26 March, 2020 (https://www.epa.gov/sites/production/files/2020-04/documents/ghg-emission-factors-hub.pdf) and GWPs from the IPCC Fifth Assessment Report (AR5 - 100 year) were applied. Actual employee commute emissions for the 2334 employees that responded to the survey were 5402 t CO2e, and estimated employee commute emissions for the remaining 6265 employees were 14390 tCO2e.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

Please explain

Upstream leased assets

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

SBH does not operate any leased facilities within the company's boundaries.

Downstream transportation and distribution

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Processing of sold products

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

SBH products are finished goods and do not undergo further processing after point of sale.

Use of sold products

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

End of life treatment of sold products

Evaluation status

Relevant, not yet calculated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Downstream leased assets

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

SBH does not operate any leased facilities within the company's boundaries.

Franchises

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

SBH does not operate franchises.

Investments

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

SBH did not make investments in the reporting year that could substantially impact the company's Scope 3 emissions.

Other (upstream)

Evaluation status

Not evaluated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Other (downstream)

Evaluation status

Not evaluated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

C6.7

(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

No

C-AC6.8/C-FB6.8/C-PF6.8

(C-AC6.8/C-FB6.8/C-PF6.8) Is biogenic carbon pertaining to your direct operations relevant to your current CDP climate change disclosure?

No

C-AC6.9/C-FB6.9/C-PF6.9

(C-AC6.9/C-FB6.9/C-PF6.9) Do you collect or calculate greenhouse gas emissions for each commodity reported as significant to your business in C-AC0.7/FB0.7/PF0.7?

Agricultural commodities

Cattle products

Do you collect or calculate GHG emissions for this commodity?

No

Please explain

The logistics required and cost associated with collecting this data are prohibitive at this time.

Agricultural commodities

Fish and seafood from aquaculture

Do you collect or calculate GHG emissions for this commodity?

No

Please explain

The logistics required and cost associated with collecting this data are prohibitive at this time.

(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Intensity figure

0.00003057

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

116221

Metric denominator

unit total revenue

Metric denominator: Unit total

3802100000

Scope 2 figure used

Location-based

% change from previous year

2.1

Direction of change

Decreased

Reason for change

Scope 1-2 Location-Based Emissions decreased by 2.3% while net revenue decreased by .2% compared to the previous reporting year, resulting in a decrease in emissions per unit revenue of 2.1%. Spectrum Brands implemented a number of emissions reduction projects within the reporting year which improved the efficiency of our processes and our overall Scope 1 and Scope 2 location-based emissions intensity. These projects amounted to a total emissions reduction of 4,618 tons, a 3.9% decrease from our FY18 Scope 1 and Scope 2 location-based emissions (-4618/ 118938 = - 3.9%). Some of our most impactful emissions reduction projects include the installation of Building Energy Management Systems (BEMS) at multiple sites and the conversion to LED lighting at multiple sites, which has reduced our electricity consumption and scope 2 emissions.

Intensity figure

13.7

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

116221

Metric denominator

full time equivalent (FTE) employee

Metric denominator: Unit total

8471

Scope 2 figure used

Location-based

% change from previous year

8

Direction of change

Increased

Reason for change

Scope 1-2 Location-Based Emissions increased by 2.3% while the number of FTE employees reduced by 9.5% compared to the previous reporting year, resulting in an increase in emissions per FTE of 8%.

C7. Emissions breakdowns

C7.1

(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Yes

C7.1a

(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).

Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
CO2	37928.369	IPCC Fifth Assessment Report (AR5 – 100 year)
CH4	25.617	IPCC Fifth Assessment Report (AR5 – 100 year)
N2O	31.962	IPCC Fifth Assessment Report (AR5 – 100 year)

C7.2

(C7.2) Break down your total gross global Scope 1 emissions by country/region.

Country/Region	Scope 1 emissions (metric tons CO2e)
United States of America	8702.058
Australia	0
Cambodia	196.615
China	1622.722
Germany	1679.917
Mexico	10191.052
Philippines	4884.92
Taiwan, Greater China	0.113
United Kingdom of Great Britain and Northern Ireland	1645.741
Netherlands	7190.182
Colombia	1130.147
Ecuador	742.483

C7.3

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

By business division

C7.3a

(C7.3a) Break down your total gross global Scope 1 emissions by business division.

Business division	Scope 1 emissions (metric ton CO2e)
HPC	2194.483
нн	20583.38
GPC	13376.003
H&G	1832.082

C-AC7.4/C-FB7.4/C-PF7.4

(C-AC7.4/C-FB7.4/C-PF7.4) Do you include emissions pertaining to your business activity(ies) in your direct operations as part of your global gross Scope 1 figure?

Yes

C-AC7.4b/C-FB7.4b/C-PF7.4b

(C-AC7.4b/C-FB7.4b/C-PF7.4b) Report the Scope 1 emissions pertaining to your business activity(ies) and explain any exclusions. If applicable, disaggregate your agricultural/forestry by GHG emissions category.

Activity

Processing/Manufacturing

Emissions category

<Not Applicable>

Emissions (metric tons CO2e)

1491

Methodology

Other, please specify

Please explain

Our pet food processing takes place at our Bridgeton and Melle facilities. This S1 emissions figure is calculated as the sum of the estimated portion of scope 1 emissions at each facility which are associated with pet food processing.

C7.5

(C7.5) Break down your total gross global Scope 2 emissions by country/region.

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)	Purchased and consumed electricity, heat, steam or cooling (MWh)	Purchased and consumed low-carbon electricity, heat, steam or cooling accounted for in Scope 2 market-based approach (MWh)
United States of America	28830.086	30159.555	52920.72	0
Australia	808.577	808.577	792.72	0
Cambodia	1041	1041	1751.59	0
China	8158.154	8158.154	13038.36	0
Germany	2337.564	0	5707.82	5707.82
Mexico	17398.003	17398.003	36379.43	0
Philippines	12086.834	12086.834	17991.61	0
Γaiwan, Greater China	1102.103	1102.103	1760.6	0
United Kingdom of Great Britain and Northern Ireland	298.725	461.253	1210.63	0
Netherlands	5864.042	7456.801	14069.43	0
Colombia	145.695	145.695	1081.87	0
Ecuador	164.476	164.476	916.45	0

C7.6

(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

By business division

C7.6a

(C7.6a) Break down your total gross global Scope 2 emissions by business division.

Business division	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
GPC	14888.82	14278.41
H&G	7222.96	7020.96
ННІ	51882.703	53303.099
HPC	4240.766	4379.979

C7.9

(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Decreased

C7.9a

(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

	Change in emissions (metric tons CO2e)	of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	0	No change	0	
Other emissions reduction activities	4618	Decreased	3.9	Emissions have not grown as high as could be expected due to other emissions reduction activities implemented during FY19. In FY19, 4,618 t CO2e were reduced by the scope 1-2 emissions reduction projects that we were able to quantify in C4.3b, including initiatives such as lighting, process optimizations, smart control systems, waste heat recovery, energy management systems, equipment replacement, and fleet efficiency. Our revised FY18 Scope 1-2 location-based emissions were 118,938 t CO2e. Therefore, we calculate this % decrease as -4,618 / 118,938 = -3.9%.
Divestment	0	No change	0	
Acquisitions	0	No change	0	
Mergers	0	No change	0	
Change in output		<not Applicable ></not 		
Change in methodology	569	Increased	0.5	Our Scope 2 location-based emissions increased by 569 MT CO2e relative to FY18 due to updated location-based emissions factors. At some sites the location-based emissions factor used for FY19 increased relative to FY18, while at others they decreased, with the net result causing an emissions increase. We calculate this % increase as 569/ 118,938 (our FY18 Scope 1 and Scope 2 location-based emissions) = .5%.
Change in boundary		<not Applicable ></not 		
Change in physical operating conditions		<not Applicable ></not 		
Unidentified	1332	Increased	1.1	After taking into consideration the impact of our emissions reduction activities and an update of our location-based S2 emissions factors, there remains an unidentified 1.1% increase in our Scope 1 and Scope 2 location-based emissions. We calculate this 1.1% increase as 1332/118,938 (our total FY18 Scope 1 and location-based Scope 2 emissions) = 1.1%. As our sustainability strategy matures we will continue to improve the tracking of activities that cause an increase or decrease in our greenhouse gas emissions.
Other		<not Applicable ></not 		

C7.9b

(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Location-based

C8. Energy

C8.1

(C8.1) What percentage of your total operational spend in the reporting year was on energy?

More than 0% but less than or equal to 5%

C8.2

(C8.2) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	Yes

C8.2a

(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	0	202570	202570
Consumption of purchased or acquired electricity	<not applicable=""></not>	5708	141913	147621
Consumption of purchased or acquired heat	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Consumption of purchased or acquired steam	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Consumption of purchased or acquired cooling	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>	<not applicable=""></not>
Consumption of self-generated non-fuel renewable energy	<not applicable=""></not>	0	<not applicable=""></not>	0
Total energy consumption	<not applicable=""></not>	5708	344483	350191

C8.2b

(C8.2b) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Yes
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

C8.2c

(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Fuels (excluding feedstocks)

Natural Gas

Heating value

HHV (higher heating value)

Total fuel MWh consumed by the organization

169248.06

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

169248.06

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

53.1145

Unit

kg CO2e per million Btu

Emissions factor source

EPA, "Emission Factors for Greenhouse Gas Inventories," Table 1 Stationary Combustion Emission Factors, March 9, 2018 (https://www.epa.gov/climateleadership/center-corporate-climate-leadership-ghg-emission-factors-hub)

Comment

Fuels (excluding feedstocks)

Motor Gasoline

Heating value

HHV (higher heating value)

Total fuel MWh consumed by the organization

39.79

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

33.79

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

8.81184

Unit

kg CO2e per gallon

Emissions factor source

EPA, "Emission Factors for Greenhouse Gas Inventories," Table 1 Stationary Combustion Emission Factors, March 9, 2018 (https://www.epa.gov/climateleadership/center-corporate-climate-leadership-ghg-emission-factors-hub)

Comment

Fuels (excluding feedstocks)

Diesel

Heating value

HHV (higher heating value)

Total fuel MWh consumed by the organization

3648.02

MWh fuel consumed for self-generation of electricity

3648.02

MWh fuel consumed for self-generation of heat

0

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

10.24268

Unit

kg CO2e per gallon

Emissions factor source

EPA, "Emission Factors for Greenhouse Gas Inventories," Table 1 Stationary Combustion Emission Factors, March 9, 2018 (https://www.epa.gov/climateleadership/center-corporate-climate-leadership-ghg-emission-factors-hub)

Comment

Fuels (excluding feedstocks)

Propane Gas

Heating value

HHV (higher heating value)

Total fuel MWh consumed by the organization

29634.03

MWh fuel consumed for self-generation of electricity

U

MWh fuel consumed for self-generation of heat

29634.03

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

5.74081

Unit

kg CO2e per gallon

Emissions factor source

EPA, "Emission Factors for Greenhouse Gas Inventories," Table 1 Stationary Combustion Emission Factors, March 9, 2018 (https://www.epa.gov/climateleadership/center-corporate-climate-leadership-ghg-emission-factors-hub)

Comment

CDP

C8.2d

(C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

		Generation that is consumed by the organization (MWh)	_	Generation from renewable sources that is consumed by the organization (MWh)
Electricity	1094	1094	0	0
Heat	0	0	0	0
Steam	0	0	0	0
Cooling	0	0	0	0

C8.2e

(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero emission factor in the market-based Scope 2 figure reported in C6.3.

Sourcing method

Green electricity products (e.g. green tariffs) from an energy supplier, not supported by energy attribute certificates

Low-carbon technology type

Hydropower

Country/region of consumption of low-carbon electricity, heat, steam or cooling

Germany

MWh consumed accounted for at a zero emission factor

5707.8

Comment

Spectrum's Melle facility consumes 100% renewable energy purchased from the utility.

C9. Additional metrics

C9.1

(C9.1) Provide any additional climate-related metrics relevant to your business.

C10. Verification

C10.1

(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	No third-party verification or assurance

C10.1a

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Verification or assurance cycle in place
Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

Spectrum Brands FY 2019 GHG Verification Statement_20200818.pdf

Page/ section reference

1

Relevant standard

Other, please specify (Environmental Resources Trust Corporate GHG Verification Guideline (Tier II))

Proportion of reported emissions verified (%)

100

C10.1b

(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Scope 2 approach

Scope 2 market-based

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

Spectrum Brands FY 2019 GHG Verification Statement_20200818.pdf

Page/ section reference

1

Relevant standard

Other, please specify (Environmental Resources Trust Corporate GHG Verification Guideline (Tier II))

Proportion of reported emissions verified (%)

100

C10.2

(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5? No, but we are actively considering verifying within the next two years

C11. Carbon pricing

C11.1

(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)? Yes

C11.1a

(C11.1a) Select the carbon pricing regulation(s) which impacts your operations.

EU ETS

C11.1b

(C11.1b) Complete the following table for each of the emissions trading schemes you are regulated by. **EU ETS** % of Scope 1 emissions covered by the ETS

Period start date January 1 2019

Period end date

December 31 2019

Allowances allocated

Allowances purchased

2700

Verified Scope 1 emissions in metric tons CO2e

% of Scope 2 emissions covered by the ETS

Verified Scope 2 emissions in metric tons CO2e

Details of ownership

Facilities we own and operate

Comment

C11.1d

(C11.1d) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

Spectrum Brands Holdings strategy with regard to complying with schemes in which we participate is to adhere to European law according to the Energy Emissions Directive. This particular site is subject to the EU-ETC emission trading scheme via a separate CO2 emission trading permit, granted by the Dutch Emissions Authority dated January 2013.

C11.2

(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period? No

C11.3

(C11.3) Does your organization use an internal price on carbon?

No, and we do not currently anticipate doing so in the next two years

C12. Engagement

C12.1

(C12.1) Do you engage with your value chain on climate-related issues?

Yes, our suppliers

Yes, our customers

C12.1a

(C12.1a) Provide details of your climate-related supplier engagement strategy.

Type of engagement

Information collection (understanding supplier behavior)

Details of engagement

Collect climate change and carbon information at least annually from suppliers

% of suppliers by number

22

% total procurement spend (direct and indirect)

% of supplier-related Scope 3 emissions as reported in C6.5

Ω

Rationale for the coverage of your engagement

The coverage of our engagement prioritizes suppliers from whom we require data to respond to and achieve improved performance on the Walmart Sustainability Index. In 2019, we surveyed 260 tier 1 suppliers to generate our responses to the WMSI surveys that include product category Key Performance Indicators (KPIs).

Impact of engagement, including measures of success

SBH engagement with suppliers is undertaken to evaluate the risks and opportunities presented by our upstream relationships. Engagement success is measured by high response rates to supplier surveys, enabling us to improve performance with regard to CDP and the Walmart Sustainability Index and thereby leading to increased transparency within the supply chain. The intent of surveying suppliers is to go beyond collecting data to increasing awareness, which we facilitate by providing educational materials describing the importance of evaluating, improving and reporting on sustainability-related impacts.

Comment

C12.1b

(C12.1b) Give details of your climate-related engagement strategy with your customers.

Type of engagement

Education/information sharing

Details of engagement

Share information about your products and relevant certification schemes (i.e. Energy STAR)

% of customers by number

0.12

% of customer - related Scope 3 emissions as reported in C6.5 $\ensuremath{\text{0}}$

Portfolio coverage (total or outstanding)

<Not Applicable>

$Please\ explain\ the\ rationale\ for\ selecting\ this\ group\ of\ customers\ and\ scope\ of\ engagement$

SBH reports to CDP as well as the Walmart Sustainability Index (WMSI)/THESIS. Our strategy for prioritizing engagement is based significantly on our customers' priorities, which also prompt us to measure greenhouse gas emissions and other climate change impacts beyond our standard organizational reporting.

Impact of engagement, including measures of success

Success is measured by consistently improving sustainability performance across our product categories in the Walmart Sustainability Index/THESIS. In 2019, we earned a top 3 ranking for 7 out of 10 ranked product categories. We also continued to increase our company-wide average, achieving a 61.5% average in 2019, up from 60% in 2018, 47% in 2017 and 35% in 2016.

C12.3

(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?

C12.3g

(C12.3g) Why do you not engage with policy makers on climate-related issues?

While we have engaged with a trade association in the past related to climate change policy, Spectrum Brands Holdings did not engage during the reporting year. This type of engagement will be considered as we move forward in our sustainability journey and continue our commitment to our public sustainability goals.

C12.4

(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Publication

In mainstream reports

Status

Complete

Attach the document

SPB_10K_11152019.pdf

Page/Section reference

Pg. 3 Forward Looking Statements, Pg. 17 Risk of Environmental Liability,

Content elements

Strategy

Risks & opportunities

Comment

Publication

In voluntary sustainability report

Status

Complete

Attach the document

2019-CCR-Update (3).pdf

Page/Section reference

2-11

Content elements

Emissions figures

Other metrics

Comment

C15. Signoff

C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

C15.1

(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	Executive Vice President, General Council	Other C-Suite Officer

SC. Supply chain module

SC0.0

(SC0.0) If you would like to do so, please provide a separate introduction to this module.

SC0.1

(SC0.1) What is your company's annual revenue for the stated reporting period?

	Annual Revenue
Row 1	3802100000

(SC0.2) Do you have an ISIN for your company that you would be willing to share with CDP?

No

SC1.1

(SC1.1) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.

Requesting member

Walmart, Inc.

Scope of emissions

Scope 1

Allocation level

Company wide

Allocation level detail

<Not Applicable>

Emissions in metric tonnes of CO2e

5152

Uncertainty (±%)

5

Major sources of emissions

Natural gas

Verified

No

Allocation method

Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

SBH has engaged a third party consulting firm to identify the inventory boundaries, complete all calculations, and report emissions to CDP. The chosen allocation method is approximate.

Requesting member

Walmart, Inc.

Scope of emissions

Scope 2

Allocation level

Company wide

Allocation level detail

<Not Applicable>

Emissions in metric tonnes of CO2e

10612

Uncertainty (±%)

5

Major sources of emissions

Purchased electricity (location-based)

Verified

No

Allocation method

Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

SBH has engaged a third party consulting firm to identify the inventory boundaries, complete all calculations, and report emissions to CDP. The chosen allocation method is approximate.

Requesting member

Walmart, Inc.

Scope of emissions

Scope 3

Allocation level

Company wide

Allocation level detail

<Not Applicable>

Emissions in metric tonnes of CO2e

4687

Uncertainty (±%)

5

Major sources of emissions

Transmission & distribution losses associated with purchased electricity (location-based), employee commute, waste and water consumption

Verified

No

Allocation method

Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

SBH has engaged a third party consulting firm to identify the inventory boundaries, complete all calculations, and report emissions to CDP. The chosen allocation method is approximate.

Requesting member

Target Corporation

Scope of emissions

Scope 1

Allocation level

Company wide

Allocation level detail

<Not Applicable>

Emissions in metric tonnes of CO2e

571

Uncertainty (±%)

5

Major sources of emissions

Natural gas

Verified

No

Allocation method

Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

SBH has engaged a third party consulting firm to identify the inventory boundaries, complete all calculations, and report emissions to CDP. The chosen allocation method is approximate.

Requesting member

Target Corporation

Scope of emissions

Scope 2

Allocation level

Company wide

Allocation level detail

<Not Applicable>

Emissions in metric tonnes of CO2e

1175

Uncertainty (±%)

5

Major sources of emissions

Purchased electricity (location-based)

Verified

Yes

Allocation method

Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

SBH has engaged a third party consulting firm to identify the inventory boundaries, complete all calculations, and report emissions to CDP. The chosen allocation method is approximate.

Requesting member

Target Corporation

Scope of emissions

Scope 3

Allocation level

Company wide

Allocation level detail

<Not Applicable>

Emissions in metric tonnes of CO2e

519

Uncertainty (±%)

5

Major sources of emissions

Transmission & distribution losses associated with purchased electricity (location-based), employee commute, waste and water consumption

Verified

No

Allocation method

Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

SBH has engaged a third party consulting firm to identify the inventory boundaries, complete all calculations, and report emissions to CDP. The chosen allocation method is approximate.

Requesting member

J Sainsbury Plc

Scope of emissions

Scope 1

Allocation level

Company wide

Allocation level detail

<Not Applicable>

Emissions in metric tonnes of CO2e

124

Uncertainty (±%)

5

Major sources of emissions

Natural gas

Verified

No

Allocation method

Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

SBH has engaged a third party consulting firm to identify the inventory boundaries, complete all calculations, and report emissions to CDP. The chosen allocation method is approximate.

Requesting member

J Sainsbury Plc

Scope of emissions

Scope 2

Allocation level

Company wide

Allocation level detail

<Not Applicable>

Emissions in metric tonnes of CO2e

255

Uncertainty (±%)

5

Major sources of emissions

Purchased electricity (location-based)

Verified

No

Allocation method

Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

SBH has engaged a third party consulting firm to identify the inventory boundaries, complete all calculations, and report emissions to CDP. The chosen allocation method is approximate.

Requesting member

J Sainsbury Plc

Scope of emissions

Scope 3

Allocation level

Company wide

Allocation level detail

<Not Applicable>

Emissions in metric tonnes of CO2e

113

Uncertainty (±%)

5

Major sources of emissions

Transmission & distribution losses associated with purchased electricity (location-based), employee commute, waste and water consumption

Verified

No

Allocation method

Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

SBH has engaged a third party consulting firm to identify the inventory boundaries, complete all calculations, and report emissions to CDP. The chosen allocation method is approximate.

SC1.2

(SC1.2) Where published information has been used in completing SC1.1, please provide a reference(s).

Not applicable

SC1.3

(SC1.3) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

Allo	cation challenges	Please explain what would help you overcome these challenges
We f	ace no challenges	

SC1.4

(SC1.4) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

No

SC1.4b

(SC1.4b) Explain why you do not plan to develop capabilities to allocate emissions to your customers.

SBH does not face any challenges with emissions allocation at this time. The company is comfortable with its current strategy to allocate emissions.

SC2.1

(SC2.1) Please propose any mutually beneficial climate-related projects you could collaborate on with specific CDP Supply Chain members.

SC2.2

(SC2.2) Have requests or initiatives by CDP Supply Chain members prompted your organization to take organizational-level emissions reduction initiatives?

SC3.1

(SC3.1) Do you want to enroll in the 2020-2021 CDP Action Exchange initiative?

No

SC3.2

(SC3.2) Is your company a participating supplier in CDP's 2019-2020 Action Exchange initiative? No

SC4.1

(SC4.1) Are you providing product level data for your organization's goods or services?

No, I am not providing data

Submit your response

In which language are you submitting your response? English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission	Are you ready to submit the additional Supply Chain Questions?
I am submitting my response	Investors	Non-public	Yes, submit Supply Chain Questions now
	Customers		

Please confirm below

I have read and accept the applicable Terms

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