

Environmental, Biodiversity, and Deforestation Policy

Spectrum Brands, Inc.

Environmental Commitment

Spectrum Brands Holdings, Inc. and its controlled affiliates and subsidiaries and their directors, officers, employees, contractors, and contingent labor worldwide (collectively, “Spectrum Brands”), are committed to the health and safety of our employees and protection of the environment across our global operations. Spectrum Brands holds as a core value the importance of providing an environment oriented to safe behaviors and environmental stewardship, and we are committed to doing our part to find solutions to the climate challenge.

To meet our commitments, Spectrum Brands:

- Complies with or exceeds all applicable environmental, health, and safety (“EHS”) laws and regulations and Spectrum Brands’ policies and standards.
- Makes available the resources required to ensure Spectrum Brands meets EHS responsibilities to our employees, customers, partners, suppliers, communities, government agencies and industry groups.
- Selects and retains those suppliers, contractors, or outsourced manufacturers and service providers who comply with all applicable laws and regulations and meet Spectrum Brands’ EHS expectations and Supplier Code of Conduct.
- Staffs, equips, and trains personnel specializing in environmental protection, health and safety.
- Minimizes impact on the environment by assessing ways to reduce greenhouse gas emissions, reduce hazardous and non-hazardous waste, increase recycling, and reduce water use. We continue to evaluate renewable energy sources for our global operations.
- Develops and continuously improves our existing EHS management systems based on globally recognized systems including ISO14001, OHSAS 18001, Life Safety Code and ANSI.
- Measures conformance to our EHS management systems with periodic audits and assessments of all our operations with the goal of continuous improvement.
- Report our progress on achieving EHS and environmental goals through the CDP and biennial Sustainability Report.

Biodiversity and Deforestation

Spectrum Brands is a global company, and we recognize the impact that a loss of biodiversity and increased deforestation can have on the overall environment. We are committed to addressing these issues on a global scale and are working with our global teams to ensure we comply with applicable laws and regulations. While biodiversity is regional, deforestation affects all regions. We recognize the importance of addressing these issues now, to avoid contributing to the further impacts of biodiversity loss and deforestation, including the extraction and use of palm oil and other forest commodities.

Our continued efforts to mitigate climate change impacts include protecting biodiversity, minimizing deforestation and forest degradation, and working with suppliers to ensure the raw materials used in our products and packaging are sustainably sourced. We are engaged in efforts to use packaging materials that are substantiated with widely recognized certifications.

Monitoring of Biodiversity & Deforestation

Spectrum Brands is working to proactively address issues related to biodiversity and deforestation. We monitor our supply chain for potential issues in these areas, and, when we are made aware of an issue regarding biodiversity, deforestation, or the use of unsustainable sourced palm oil and other forest commodities, we work diligently to address these and prevent future concerns.

Sustainable Sourcing of Palm Oil

The unsustainable sourcing of palm oil can contribute to deforestation and the exploitation of indigenous peoples and local communities located in these regions. Spectrum Brands is committed to sustainably sourcing palm oil to promote environmental sustainability, protect biodiversity, and prevent deforestation. We expect our suppliers to adhere to this commitment and other policies related to sourcing raw materials.

If we are made aware of a supplier contributing to deforestation or the unsustainable sourcing of palm oil, we will take immediate action to encourage the supplier to source their raw materials sustainably, including measures up to and including severing the relationship with the supplier. Spectrum Brands takes these concerns seriously and is committed to doing our part to reduce the unsustainable sourcing of palm oil and other sensitive forest commodities.