



HUMAN RIGHTS POLICY

Category: Corporate Compliance
Responsible Department: Legal and Risk Mitigation
Responsible Executive: General Counsel

Date Established: April 2020
Date Last Revised: --
Date Posted to SPB Library: August 2021

Summary

Respect for human rights is a fundamental value of Spectrum Brands Holdings, Inc. ("Spectrum Brands" or the "Company"). This Human Rights Policy (the "Policy") demonstrates Spectrum Brands' commitment to respect and promote human rights, including the protection of minority groups' rights and women's rights, in furtherance of the guidance set forth in, among others, the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, the International Labour Organizations Declaration on Fundamental Principles and Rights at Work, and the Organization for Economic Cooperation and Development for Multinational Enterprises. Through proactive due diligence, Spectrum Brands strives to identify, prevent, and prohibit human rights risks to people in our business and supply chain.

Scope

This Policy applies to Spectrum Brands and its controlled affiliates and subsidiaries and their directors, officers, employees, contractors, and contingent labor worldwide. Spectrum brands also expects its partners, distributors, resellers, consultant, contractors, agents, vendors and suppliers ("Related Parties") to uphold these principles and urges them to adopt similar policies within their own businesses. All directors, officers and employees should read the Policy carefully and make sure that they understand it, the consequences of non-compliance, and the Policy's importance to the success of Spectrum Brands. If any employee has any questions, they should speak to their supervisor, the General Counsel or any of the other resources identified in the Policy. The Policy cannot and is not intended to cover every applicable law or provide answers to all questions that might arise; for that we must ultimately rely on each person's good sense of what is right, including a sense of when it is proper to seek guidance from others on the appropriate course of conduct.

Policy

Respecting One Another

The way we treat each other, and our work environment, affects the way we do our jobs. All employees want and deserve a work place where they are respected and appreciated. Everyone who works for Spectrum Brands must contribute to the creation and maintenance of such an environment, and supervisors have a special responsibility to foster a workplace that supports honesty, integrity, respect and trust.

Employee Privacy

We respect the privacy and dignity of all individuals. Spectrum Brands collects and maintains personal information that relates to your employment, including medical and benefit information. Special care is taken to limit access to personal information to Spectrum Brands personnel who have a need to know such information for a legitimate purpose. The Company will protect private information in accordance with applicable law and Spectrum Brands' policies.

Equal Employment Opportunity and Nondiscrimination

Spectrum Brands is an equal opportunity employer in hiring and promoting practices, benefits and wages. We will not tolerate discrimination against any person on the basis of race, religion, color, gender, age, marital status, national origin, sexual orientation, citizenship, traits historically associated with race (including hair texture or type and protective hairstyles), Vietnam-era or disabled veteran status, HIV/AIDS status, gender identity, gender expression, disability (where the applicant or employee is qualified to perform the essential functions of the job with or without reasonable accommodation), or any other basis prohibited by law in recruiting, hiring, placement, promotion, or any other condition of employment.

Diversity and Inclusion

We seek to recruit, hire and retain the best talent from around the world for all workforce levels (including its Board of Directors and senior management) regardless of gender, race, age, ethnicity, religion, national origin, or any other protected characteristic, reflecting the markets and consumers we serve. Developing and retaining a diverse workforce provides us with a sustained competitive advantage. We recognize that a diverse mix of backgrounds, skills and experiences drives new ideas, products and services, and expect all Spectrum Brands people to treat each other, customers, suppliers and others with respect and dignity. This maximizes our ability to achieve our goals.

Sexual and Other Forms of Harassment

Spectrum Brands policy strictly prohibits any form of harassment in the workplace, including sexual harassment. Spectrum Brands will take prompt and appropriate action to prevent and, where necessary, discipline behavior that violates this policy. Harassment on the basis of other characteristics is also strictly prohibited. Under this policy, harassment is verbal, physical, or visual conduct that degrades or shows hostility or hatred toward an individual because of the individual's race, color, national origin, citizenship, religion, sexual orientation, marital status, age, mental or physical handicap or disability, veteran status or any other characteristic protected by law, which:

- has the purpose or effect of creating an intimidating, hostile, or offensive work environment;
- has the purpose or effect of unreasonably interfering with an individual's work performance; or
- otherwise adversely affects an individual's employment.

Harassing conduct includes, but is not limited to, the following: epithets, slurs, negative stereotyping, threatening, intimidating or hostile acts and written or graphic material that ridicules or shows hostility or aversion to an individual or group and that is posted on Spectrum Brands premises or circulated in the workplace.

Safety and Security in the Workplace

The safety and security of employees is of primary importance, and we are all responsible for keeping our facilities free from recognized hazards and obeying all Spectrum Brands safety rules. Employees are to immediately report any unsafe working conditions and are prohibited from working on any unsafe or broken equipment. Working conditions should be maintained in a clean and orderly state to encourage efficient operations and promote good safety practices.

No employee may bring firearms, explosives, incendiary devices or any other weapons into the workplace or any work-related setting, regardless of whether or not employees are licensed to carry such weapons. Similarly, Spectrum Brands will not tolerate threats or any level of violence in the workplace or in any work-related setting. Threats or assaults that require immediate attention should be reported to Security or the police at 911.

Child, Forced, or Compulsory Labor and Physical Abuse

Spectrum Brands forbids the use of child, forced, or compulsory prison labor in any of our global operations or

facilities, and will not tolerate exploitation of children, physical punishment or abuse, or involuntary servitude. Spectrum Brands fully respects all applicable laws establishing a minimum age for employment, in order to support the effective abolition of child labor worldwide and does not permit workers under the age of 18 to perform work on Spectrum Brands' behalf, unless local law allows otherwise.

Wage and Hour Practices

Spectrum Brands is committed to provide fair and competitive wages to its employees. We follow all applicable wage and hour laws in accordance with federal and local laws and practices.

Freedom of Association

Spectrum Brands respects every employee's right to choose to join or not to join a trade union, to collectively bargain, or to have recognized employee representation in accordance with applicable law.

Healthy Lifestyles

Spectrum Brands is committed to promoting healthy lifestyles for its employees and our consumers.

Training

Spectrum Brands provides its employees training on a regular basis on workplace practices, including non-harassment, equal opportunity, human rights, and safe workplace behaviors.

Land Rights and Water Resources

Spectrum Brands recognizes the significant implications regarding respect for human rights that land use and water use across our value chain may have, which we address through specific policy and action. We respect the human need and right for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation. Spectrum Brands has worked to develop policies and practices that mitigate risk by assessing local water risks, consulting and partnering with governments, communities and other stakeholders to develop water stress solutions where and when needed, and also implementing source water protection plans at our facilities.

Third Parties

Spectrum Brands encourages all Related Parties to comply with this Policy, and requires all suppliers and vendors to abide by the Company's Supplier Policy of Conduct, which incorporates the provisions of this Policy.

Animals

It is Spectrum Brands' policy to perform animal testing as mandated by the Federal Environmental Protection Agency ("EPA") and the Food and Drug Administration ("FDA") on its products that fall under the jurisdiction of the EPA or the FDA. Spectrum Brands is committed to bringing real solutions to pet owners and making pets happy. We conduct palatability and taste testing in accordance with applicable laws to determine animal preferences of treats. Spectrum Brands does not conduct or permit studies that require invasive techniques or loss of life, and we support: (a) the internationally accepted "3 Rs": (i) replacement of animal studies with non-animal alternatives, (ii) reduction in the numbers of animals involved in studies; and (iii) the refinement of methods to enhance animal welfare; and (b) the FDA's stance on research and animal testing – derive the maximum amount of useful scientific information from the minimum number of animals and employ the most humane methods available within the limitations of scientific capability.

IMPLEMENTATION OF THE POLICY

Responsibilities

This Policy is overseen by Spectrum Brands' Board of Directors, Chief Executive Officer, and Named Executive Officers through regular meetings and updates. While each of us is individually responsible for putting the Policy to work, we need not go it alone. In doing so, Spectrum Brands has a number of resources, people and processes in place to answer our questions and guide us through difficult decisions.

Although compliance with and enforcement of this Policy ultimately rests with the Company, this can be done only with all employees' support, cooperation, and assistance. Because Spectrum Brands can take action to correct any policy violation only if it is aware of it, each employee has a duty to implement and enforce this Policy. *If you see something, say something.*

Copies of this Policy are available on Spectrum Brands' Intranet.

Community and Stakeholder Engagement

Spectrum Brands is part of the communities in which we operate. We strive to engage with communities on human rights matters that are important to them such as land rights, access to water and health. Our goal is to develop a dialogue where we can listen to, learn from and consider their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level. Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes issues in our Company, across our value chain and with our various sponsorships, through which we seek to promote respect for human rights.

Seeking Guidance

This Policy cannot provide definitive answers to all questions. If you have questions regarding any of the policies discussed in this Policy, or if you are in doubt about the best course of action in a particular situation, you should seek guidance from your supervisor, the Senior Vice President, Global Human Resources, the General Counsel or the other resources identified in this Policy. This Policy will be interpreted and enforced by Spectrum Brands, which shall be the final authority with respect to interpreting and enforcing this Policy.

Reporting Violations

If you know of or suspect a violation of applicable laws or regulations, the Policy, or Spectrum Brands' related policies, you may report that information to your supervisor, the Executive Vice President, Global Human Resources, the General Counsel or the helpline discussed below. *No one will be subject to retaliation because of a good faith report of suspected misconduct.*

The Helpline

Spectrum Brands has a 24-hour helpline, 1-866-384-4277, and website, <https://secure.ethicspoint.com/domain/media/en/gui/7424/index.html>, which you can use to report violations of Spectrum Brands' policies or to seek guidance on those policies. You may report suspected violations to or ask questions of the helpline anonymously; however, providing your name may expedite the time it takes Spectrum Brands to respond to your call, and it also allows Spectrum Brands to contact you if necessary during any investigation. Either way, you should treat the information that you provide as confidential. Spectrum Brands will not in any way retaliate against any individual for making a good faith complaint or report or for participating in the investigation of such a complaint or report.

Investigations of Suspected Violations

All reported violations will be promptly investigated and treated confidentially to the extent possible. It is imperative that reporting persons not conduct their own preliminary investigations. Investigations of alleged violations may involve complex factual and/or legal issues and acting on your own may compromise the integrity of an investigation and adversely affect both you and Spectrum Brands.

Discipline for Violations

Spectrum Brands intends to use every reasonable effort to prevent the occurrence of conduct not in compliance with its Policy and to halt any such conduct that may occur as soon as reasonably possible after its discovery. Spectrum Brands personnel who violate this Policy, who ignore evidence of violations of this Policy, or who retaliate against individual for reporting a good faith violation under this Policy may be subject to disciplinary actions, up to and including termination of employment.

Waivers of the Policy

Spectrum Brands will waive application of the policies set forth in this Policy only where circumstances warrant granting a waiver, and then only in conjunction with any appropriate monitoring of the particular situation. Waivers of the Policy for Directors and executive officers may be made only by the Board as a whole or the Audit Committee.

No Rights Created

This Policy is a statement of the fundamental principles and key policies and procedures that govern the conduct of Spectrum Brands', its employees, and its Related Parties. It is not intended to and does not create any rights in any employee, client, supplier, competitor, shareholder or any other person or entity, nor does it, in any way, constitute an employment contract or an assurance of continued employment.

Remember

Ultimate responsibility to assure that we as a Company comply with the many laws, regulations and ethical standards affecting our business rests with each of us. You must become familiar with and conduct yourself strictly in compliance with those laws, regulations and standards and Spectrum Brands' policies and guidelines pertaining to them. *If you have questions, ask them; if you have concerns, please raise them; if you feel uncomfortable, seek advice.*

Note that this is a policy of Spectrum Brands, its subsidiaries and controlled affiliates, and the rights and obligations are applicable to the persons identified herein. Nothing in this Policy grants any person other than Spectrum Brands the benefit of any rights or privileges, which belong solely to Spectrum Brands.

To the extent any provision in this Policy conflicts with another policy, the most strict provision shall apply.

Timeliness of Response/Review

It is the intent of Spectrum Brands Holdings, Inc. to ensure compliance with this Policy and all appropriate procedures as quickly and efficiently as possible. In the event the particular claim or situation requires further analysis or internal review, the timing will be adjusted accordingly.

Contact Information

Spectrum Brands, Inc.
Attn: General Counsel
3001 Deming Way

Middleton, WI 53562

Related Information

Spectrum Brands Documents:

None

Other Documents:

Supplier Policy of Conduct
Sexual or Other Harassment Policy
Workplace Environment Policy
Privacy Policy
Code of Business Conduct and Ethics

Related Links:

None

Revision History

Enter a list of revisions that have been made to the Policy (if applicable).

April 2020	Policy Creation
August 2021	Language Updated

Responsible Executive



Ehsan Zargar, Executive Vice President, General Counsel & Corporate Secretary

Spectrum Brands Holdings, Inc.
Human Rights Policy

I have received and read Spectrum Brands Holdings, Inc.'s Human Rights Policy (the "Policy"), and I understand its contents. I agree to comply fully with the standards, policies and procedures contained in the Policy and the related policies and procedures of Spectrum Brands Holdings, Inc. I understand that I have an obligation to report any suspected violations of the Policy that I am aware of. I acknowledge that the Policy is a statement of policies for appropriate conduct and does not, in any way, constitute an employment contract, an assurance of continued employment, or any other rights or privileges.

Printed Name

Signature

Date