



Code of Conduct

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Message from Ravi Saligram

At Newell Brands, we are committed to doing things right and always doing the right thing. Our Values of Truth, Transparency, Teamwork and Trust provide a foundation for ethical behavior and guide our interactions with each other and our customers, consumers, vendors and suppliers. Acting honestly and using good judgment are imperative to fulfilling our purpose and achieving our vision.

Our Code of Conduct is the roadmap for conducting business with the highest standards of integrity and operating ethically at every level of the organization. I ask each of you to join me in committing to our Code and adhering to its principles every day in all we do. Together we can ensure we are recognized as an ethical company, valued business partner and a trusted provider of leading brands.

Thank you for your commitment to making Newell Brands a great place to work and do business with.

Ravi K. Saligram
President & CEO

Ravi





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- 1.1 Our People & Purpose
- 1.2 Our Code of Conduct
- 1.3 Our Speak-Up Culture

1.0 We commit to doing the right thing



1.0 We commit to doing the right thing

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Our People & Purpose

With shared Purpose and Values and a desire to be a force for good in the world, our people strive to meet and exceed customer and consumer needs while making the planet a better place and fostering an inclusive environment where all are welcomed and valued. Our global workforce embraces a diverse collection of skills, experiences, abilities and backgrounds to build leading brands, drive innovation and create stakeholder value.

Our commitment to operating ethically extends beyond our walls to our consumers' lives and homes where we deliver superior product innovation, design and performance. It is only by treating our consumers, customers, communities and each other with respect that our beloved, planet-friendly brands may enhance and brighten consumer's lives at home and outside by creating moments of joy, building confidence and providing peace of mind.





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Our Code of Conduct

The key to our continued success is our commitment to operating ethically. Our Code reflects this commitment by embodying our Values of Truth, Transparency, Trust and Teamwork. Our Code guides us on how to make ethical decisions, but it cannot cover every situation that may arise. It is important for you to use your good judgment to make choices that are consistent with our Company's Values.

We must apply our Code consistently in all of our business dealings. When a local practice suggests a standard that is less stringent than our high standards, you should follow our Code. If you have questions about specific laws or regulations, or if you believe there is a conflicting legal obligation under the laws of different countries, contact the Legal team.

Make sure you understand our Code. If you are unclear about your responsibilities, or what the right thing to do is, speak up and ask. You will be required to certify annually that you have read and complied with our Code.





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Our Code applies to all of us

- Employees of Newell Brands regardless of location, seniority, business unit or function
- Members of our Board of Directors
- Executive Officers
- Third parties working on our Company's behalf, including agents, representatives, independent contractors and consultants

We all must follow the provisions in our Code. Keep in mind that violations of our Code may result in disciplinary action, in accordance with applicable law, up to and including termination; and, in some cases, legal action.

If you believe that you require a waiver of a specific provision, request approval from the Chief Ethics and Compliance Officer. Executive officers and directors must submit waiver requests to the Nominating/Governance Committee of the Board of Directors. If approved, Newell Brands will promptly disclose such waivers as required by law.

Managers set the tone for an ethical workplace

Managers are responsible for ensuring that their teams act with integrity. If you are a manager, we look to you to:

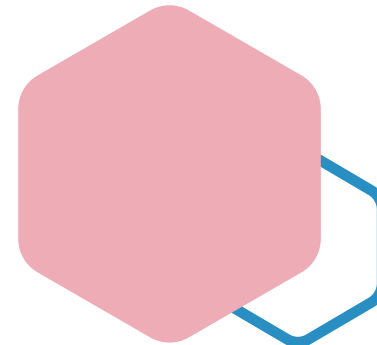
- Set a good example.
- Understand our Code, as well as the policies and laws that apply to your team.
- Promote a speak-up culture where employees feel comfortable asking questions and raising concerns.
- Report ethics and compliance concerns through the appropriate channel.
- Never respond in a retaliatory manner and ensure your team understands the importance of our non-retaliation policy.



Q&A

Q My manager asked me to do something that I'm uncomfortable with, but I'm not sure if it is a violation of our Code. What should I do?

A Report the situation to Ethics and Compliance or Human Resources. If the request makes you feel uncomfortable, you should let someone know.





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Our Speak-Up Culture

When you seek advice, raise a concern, report suspected misconduct or cooperate with an investigation you are complying with our Code and living our Values. Our Company believes in creating a culture where employees feel comfortable speaking-up and knowing that if you do speak up, you will be heard. You may reach out to your manager, Human Resources, or any of the resources listed on the [Resources page](#).

We all have a responsibility to report actual or suspected violations of our Code of Conduct. Ignoring problems makes them worse and can harm others or our Company. If you receive a report, do not investigate it yourself, instead forward it to the Ethics and Compliance team.





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What is the Ethics Hotline?

The Ethics Hotline is a confidential way to ask questions or share concerns about potentially unethical conduct. The hotline is operated by an independent, third-party company and is available 24 hours a day, 7 days a week.

When you contact the Ethics Hotline you may make a report in your own language. Your report will be documented and sent to the Ethics and Compliance team to address promptly, discreetly and, to the extent possible, confidentially.

What happens after I make a report to the Ethics Hotline?

Ethics and Compliance will inform you that we have received your report. We will objectively investigate your report, requesting support from other Company functions, as needed. To ensure that we are able to conduct a thorough investigation, you may be contacted for details related to your report.

You have an obligation to cooperate with all internal investigations. This means that you must respond to inquiries truthfully and transparently and provide information that is requested.

Ethics and Compliance will inform you when the investigation is complete. The results of the investigation may not be disclosed to you; but rest assured that the Company takes findings of misconduct seriously and will ensure we address any issues.

Q&A



- Q I am not satisfied with the resolution of a report I made to the Ethics Hotline. What should I do?**
- A** Contacting the Ethics Hotline initiates a process designed to ensure a thorough review of your concern that concludes with an appropriate resolution, including addressing conduct that does not meet our standards. If you continue to have concerns after an investigation is completed, contact Ethics and Compliance for additional consideration.
- Q I reported conduct that concerned me to my manager, but she told me not to worry about it. What should I do?**
- A** If you are not satisfied by your manager's response to your report, reach out to Ethics and Compliance. You should feel that your concerns are being heard and addressed.



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Our Non-Retaliation Policy

You will not be retaliated against in any way for raising a concern in good faith. Raising a concern in “good faith” means that you are sincere in providing honest and accurate information, even if it later turns out that you are mistaken.

Forms of retaliation include losing your job, being demoted, suspended, threatened, harassed, victimized or being discriminated against. We take claims of retaliation seriously — anyone found to have committed a retaliatory act is subject to disciplinary action, up to and including termination. If you or someone you know is the victim of retaliation, report it immediately. If you are ever concerned about your personal safety, contact Global Security.



Have a question or concern? Speak up, we're listening at [Ethics Hotline](#) or ethics@newellco.com

Q&A

Q I suspect that my manager is engaging in inappropriate conduct. Should I be concerned about promotion opportunities if I make a report involving him?

A No. You will not be subject to retaliation, including an adverse impact on potential career opportunities, for making a report in good faith. If you are concerned that something is wrong, you have an obligation to speak up and make a report.

Q Will I get in trouble if I am involved in the misconduct that I am reporting?

A There may be consequences for your actions; however, by speaking up about the conduct and cooperating with the investigation, you will be protected from any retaliatory actions.



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- 2.1 Promote respect in the workplace
- 2.2 Maintain a healthy and safe workplace
- 2.3 Ensure fair employment practices



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Promote respect in the workplace

We believe that employees are the most fulfilled, engaged and successful when they are encouraged and empowered to bring their whole selves to work, and we fundamentally believe diversity of thought and experience is essential to innovation and growth. In this spirit, we aim to foster an environment where all employees feel welcome and valued.

OUR COMPANY DEFINES DIVERSITY, INCLUSION AND BELONGING (DI&B) AS:



Diversity: The blending of many backgrounds, experiences and perspectives within our teams.



Inclusion: Fostering a collaborative workplace that equally values open participation from individuals with different ideas and viewpoints.



Belonging: The ability for employees to feel empowered to bring their whole selves to work.





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No harassment

We must ensure a respectful working environment, free of inappropriate behavior and harassment. You must speak up about intimidating, hostile or offensive workplace behavior, including:

- Making offensive comments, jokes, or slurs.
- Sharing or sending offensive pictures, images, or communications.
- Making sexual remarks, sexual advances, and inappropriate touching or gestures.
- Name calling or directing profanity or threats at another individual.

No discrimination

We recruit, hire, evaluate, promote, and compensate people without regard to any legally protected status, including race, color, sexual orientation, gender identity, age, religion, and disability. We also observe all local non-discrimination regulations.

Q&A

Q I am a manager and during a business dinner, an employee made flirtatious remarks to a vendor's representative. The representative did not seem to mind, and it was outside of the office. Should I have said something?

A Yes, you have a duty to counsel the employee on appropriate business conduct. You should not assume that the representative is okay with such treatment; and your employee must treat the representative with respect regardless of the meeting location. When you tolerate the inappropriate behavior, you send the message that it is okay.



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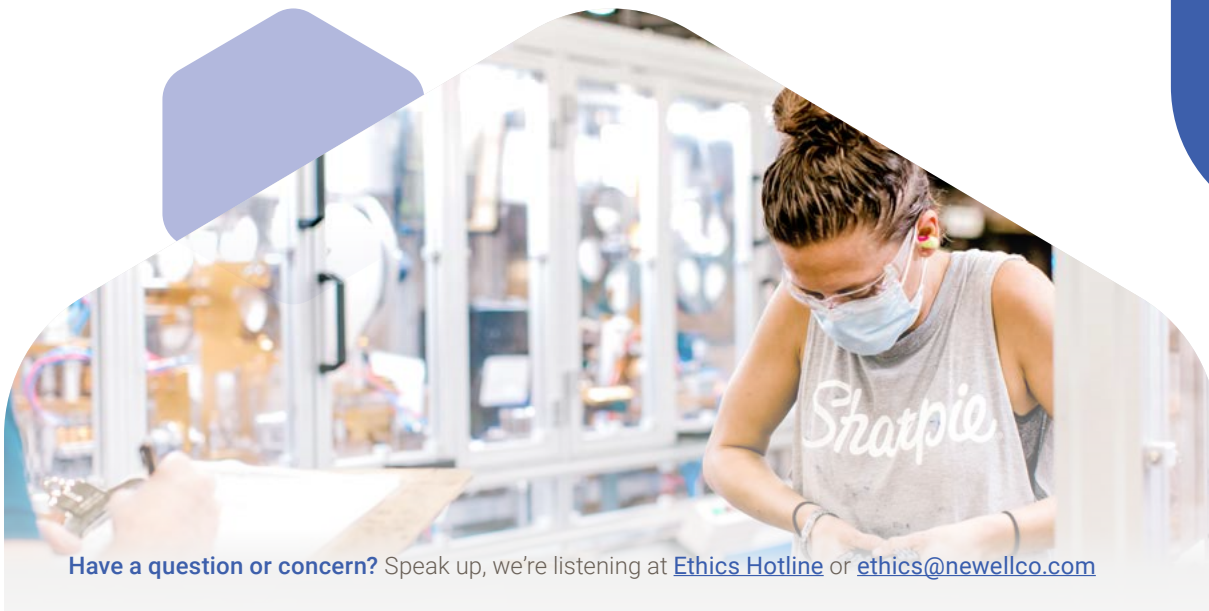
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Maintain a healthy and safe workplace

Safe work practices

No production goal, cost saving, or competitive advantage is worth an injury or illness. Our Company's occupational safety standards and guidance are based on industry best practices, and our workplaces meet or exceed applicable occupational safety and health regulations. Our Company regularly conducts reviews of our facilities and audits our safety practices. You can do your part by following safety and health requirements and promptly reporting any workplace accidents, injuries, illnesses or unsafe conditions (including "near misses").



Have a question or concern? Speak up, we're listening at [Ethics Hotline](#) or ethics@newellco.com

Q&A

- Q** A safety guard on one of our machines is broken, but I was told that we do not have the budget to have it repaired. Who should I ask about this?
- A** Speak up and report the issue to your site manager, your safety lead or Ethics and Compliance. Protecting our employees is a priority, so do your part to make sure that equipment is functioning safely.
- Q** My manager suggested that we alter our normal practices to speed up the production line, but I do not think the new process is safe. What should I do?
- A** Never compromise when it comes to safety. Contact your site safety lead or Ethics and Compliance, so that a safe course of action can be determined.



No violence in the workplace

Acts or threats of violence interfere with our commitment to a healthy and safe workplace and are not tolerated at our Company.

Every employee has a responsibility to:

- Report behaviors that threaten or harm employees in a violent, or potentially violent, manner.
- Refrain from making jokes about harming others.
- Call local law enforcement if you, or someone you know, is in immediate danger (if it is safe for you to do so).
- Never possess weapons, including firearms, knives or clubs, while on Company premises, including Company parking lots, except where otherwise required by law.

A drug-free and alcohol-free workplace

Being under the influence of drugs or alcohol will create safety hazards, put you and others at risk and negatively affect job performance. Never engage in work if you are under the influence of any substance. Also, do not possess controlled substances, drugs or drug paraphernalia (other than lawful prescriptions) while on Company premises, in Company vehicles or performing work-related tasks.

In certain instances, you may be permitted to drink alcoholic beverages at Company events, or while conducting Company business. When doing so, you must exercise both moderation and good judgment, as well as comply with applicable laws and Company policies. Alcohol use is never an excuse for inappropriate behavior at work events. Do not drive if you cannot operate a vehicle safely and legally.



Q&A

Q My team went out for after-work drinks and my manager acted in a way that made me uncomfortable. She may have had too much to drink because she has never acted this way before. What should I do?

A Report the incident to Human Resources or Ethics and Compliance. If your manager's conduct made you feel uncomfortable, you should let someone know.



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Ensure fair employment practices

Our Company values our employees and engages in ethical labor practices in our global operations and facilities.

- We forbid the use of child labor, forced labor or physical punishment.
- We follow applicable wage and hour laws, including minimum wage, overtime and maximum hour laws.
- We respect our employees' rights to lawful freedom of association and recognize their right to collective bargaining.
- We believe in equal opportunity for all employees.





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- 3.2 Avoid or disclose conflicts of interest
- 3.3 Appropriate gifts and entertainment
- 3.4 Protect and use Company assets responsibly
- 3.5 Communicate about our Company responsibly
- 3.6 Safeguard confidential information
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Maintain accurate books and records

Honesty in our books, records and financial statements is critical to our success and to maintaining the trust of our stockholders and other stakeholders. You must be accurate, transparent, prompt and complete when recording your transactions, including your timesheets and expense reports. Only use Company funds for the purpose described in the documents supporting the payment.





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Ensure the integrity of financial reports

- Follow internal processes, and the laws and rules governing financial accounting/reporting, to accurately record assets, liabilities, revenues and expenses.
- Never intentionally delay recording transactions.
- Be honest when making forecasts and ensure that our reports accurately reflect our financial position, as described by the supporting documentation.
- Disclosures we make to government entities and communications to the financial community must be full, fair, accurate, timely, and understandable.

Cooperate with auditors

Be open and honest with our internal and external auditors, tax authorities, and other regulators. Do not take any action to coerce, manipulate or mislead anyone auditing or reviewing our Company's financial statements.



Q&A

Q I informed my manager of errors in a report that we are submitting to a government agency. He told me not to worry because 'everyone does it that way.' Should I correct the errors?

A Never knowingly allow inaccurate information to be submitted to a government agency. Speak up and report your concerns to the Ethics and Compliance team.

Q My co-worker asked me to punch his timecard for him. What should I do?

A Timecards are Company records and must be punched by the employee, not a co-worker. Advise your co-worker to speak to his manager if there is an issue, but do not punch the timecard for him.



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Avoid or disclose conflicts of interest

We must always act in the best interest of our Company. A conflict of interest occurs when you are involved in a relationship or activity that affects your objectivity in making business decisions. It is not possible to list every type of conflict of interest situation, so we rely on you to disclose any situation that is, or could appear be, a conflict of interest. We can then assess the facts and address the situation.

Common conflicts of interest situations, and related guidance, can be found below.

- Investments
- Family and personal relationships
- Contacts with competitors, suppliers, vendors or customers
- Other employment
- Board of Directors
- Personal Gain



**CLICK FOR
ADDITIONAL
GUIDANCE**

Q&A



Q My partner started an online business to sell her homemade candles. Is this okay?

A Perhaps, depending on the specific details of the activity and your responsibilities at our Company. Regardless, this situation could appear to be a conflict of interest. Therefore, you should discuss it with your manager or Human Resources.



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Appropriate gifts and entertainment

Gifts and entertainment can promote positive professional relationships. However, we must ensure that there is no appearance of an improper attempt to influence business decisions associated with such activities. When giving or receiving a gift or entertainment neither party should feel that they must do something in return for the gift or entertainment.

Any gift or entertainment provided in connection with your job must be transparent and recorded accurately in our books and records. Your expense report must include the purpose of the expense and the person to whom you gave the gift or entertainment. Gifts to business partners must be recorded as gifts from the Company.

If you have questions about gifts or entertainment, review our gifts and entertainment policy below or ask your manager or Ethics and Compliance.



Q&A

Q I received a gift from a vendor that is valued at \$150, so it does not meet our guidelines. However, I do not believe that accepting the gift is inappropriate. What should I do?

A If you believe that an exception is appropriate, contact Ethics and Compliance to request a waiver. Otherwise, you should return the gift and explain that our policy does not allow you to keep it. If you are not sure how to return the gift, talk to your manager or Ethics and Compliance.

Q One of my suppliers sent me tickets to a golf tournament. What should I do?

A You can accept the tickets if: you are not obligated to treat the supplier favorably in return for the tickets; a business purpose is served (i.e., the supplier will be attending with you); you only occasionally accept tickets from the supplier; and the tickets were purchased at a reasonable price. If any of these conditions are not met, speak to your manager or Ethics and Compliance before accepting.



Protect and use Company assets responsibly

Company property and equipment

Our Company provides you with the physical and electronic resources you need to do your job. These resources are valuable Company assets, and we trust you to use them appropriately to conduct Company business. You must also protect our Company assets from theft, loss, damage, unauthorized access, waste and abuse. Promptly inform your manager about property or equipment that is unsafe or needs to be repaired.

Social media

Social media tools such as blogs, wikis, chatrooms and networking sites provide a valuable outlet to communicate about our Company. However, you must be responsible when using social media and be careful when communicating about our Company. Unless you are explicitly authorized to speak on behalf of our Company, make it clear that your views are your own and do not reflect our Company's position. When required by applicable law, disclose your affiliation with our Company. Review the [Newell Brands Social Media Policy](#) for additional information.





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Information Technology

Information Technology such as hardware, software, e-mail, and intranet/internet access are Company property. We rely on you to use these electronic assets appropriately and to protect our systems from malicious actors and downtime.

- **Never install unauthorized software, applications, hardware or storage devices on your Company issued computer.**
- **Do not use unauthorized physical or cloud storage for Company information.**
- **Do not access our network through unauthorized applications or devices.**
- **Do not access, store, send, post or publish material that is inappropriate, discriminatory, sexually explicit, offensive or threatening.**

Where legally permitted, we reserve the right to monitor the use of these resources.

Company records

Records we generate during the normal course of business are important Company assets. We must ensure that we can access these records if needed, including to comply with regulatory requirements. You are responsible for retaining, storing and disposing of Company records properly and in accordance with our [Records Retention Policy](#).

You will be notified by the Legal team if you are required to retain documents that relate to an ongoing litigation, investigation or audit. Never dispose of information that is subject to a legal hold until the Legal team provides you with written authorization to do so. Records that have met preservation and legal hold requirements should be properly discarded.





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Communicate about our Company responsibly

Only individuals authorized in writing by Corporate Communications may communicate to the media or publicly on behalf of Newell Brands. All requests for information about Newell Brands from the media should be forwarded to Corporate Communications and from analysts and investors should be forwarded to Investor Relations. If you see social media content that should be addressed by the Company, do not address it yourself, rather send the relevant information to Corporate Communications. Review the [Newell Brands Media Policy](#) for additional information.



Have a question or concern? Speak up, we're listening at [Ethics Hotline](#) or ethics@newellco.com

Q&A



Q I received a call from a reporter asking me to comment on a project I'm working on. What should I do?

A You may know the project better than anyone else in our Company, but if you are not specifically authorized by Corporate Communications to speak to the media about the project, you should refer the reporter to Corporate Communications.



Safeguard confidential information

Confidential information about our Company makes us who we are and drives our competitive advantage in the marketplace. Information is confidential if it is not generally known to the public, but you are exposed to it as part of your job. We count on you to protect our confidential information so that it is not used for improper purposes. Your obligation to protect Newell Brands' confidential information continues even if you leave our Company.

Safeguarding our Company's confidential information does not prevent you from providing information to government authorities regarding misconduct, participating in investigations, giving required testimony in proceedings regarding Newell Brands' conduct, or engaging in activities protected under the whistleblower statutes administered by any government agency.

Protect our intellectual property

Preventing the unauthorized use of our intellectual property protects our market advantage and helps grow our brands and our reputation. To the extent permitted by law, all intellectual property conceived, created or made during the course of a Newell Brands employee's work belongs to our Company and should be disclosed to the Legal team before you share it with third parties. You must use Newell Brands' intellectual property in accordance with our Company's ownership rights.

How can I protect confidential information?

- Use it only as necessary to do your job.
- Information may be confidential even if it will later become public (e.g., financial results). Treat this information as confidential until authorized Company representatives have disclosed the information publicly.
- Share it only with Company employees who need to know it to do their jobs and third parties who have signed nondisclosure agreements or who are subject to professional duties of confidentiality (e.g., attorneys).
- Safeguard confidential documents, including in your office.
- Do not discuss Company business in public places where others can hear it.
- Do not view confidential information on your laptop in public places where others can see it.
- Only allow people with proper authorization into our facilities and contact local security if you notice unauthorized visitors.
- Ensure that employees return all confidential information if they leave our Company.



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Protect the privacy of Personal Data

We believe that respecting the privacy of our employees, business partners and consumers builds trust and long-lasting relationships. As part of your job, you may handle the Personal Data of your colleagues, customers and consumers. Personal Data is information that can be used to identify an individual directly or indirectly. Examples include: name, location, phone number, email address, photography, identification numbers, payment information and IP address. When we collect, access or handle the Personal Data of our employees or third parties, we must comply with all applicable data privacy laws and the [Newell Brands Global Data Privacy Policy](#).

How can we ensure we comply with data privacy regulations?

- Do not collect more Personal Data than is needed.
- Use Personal Data for a specific purpose, and only for that purpose.
- Do not retain Personal Data longer than needed and delete it as soon as feasible.
- Limit access to Personal Data to necessary individuals.
- Send Personal Data securely and never to a personally owned device.
- Only allow a third party to access Personal Data that belongs to our Company for purposes that directly support Newell Brands.
- Consult with the Legal team before transferring data outside of the country in which it is collected.





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Engage in fair dealing

Our Company believes that promoting positive business relationships rooted in truth and transparency build long-lasting relationships. We all must deal fairly and honestly with all third parties, including customers, competitors and suppliers.

- Make sure that you are accurate in promotional materials and can substantiate any claims that you make about our products.
- Buy and sell based on appropriate business considerations such as quality, price, service, reliability and ethical standards.
- Give potential suppliers and vendors equal consideration, treating them fairly and honestly.
- Gather competitive information legally, ethically and in a way that will not reflect badly on our Company.
- Ensure that you are not infringing upon the valid intellectual property rights of any third party.

Q&A



- Q** We recently hired a Marketing Director whose previous employer is a competitor of ours. During a team meeting, my colleague asked the new hire to disclose information from her previous employer's marketing plans. What should I do?
- A** Speak up and tell your colleague that her request is improper. If you do not feel comfortable addressing your colleague, report the matter to your manager or Ethics and Compliance. Remember, we do not hire an employee of a competitor to obtain confidential information. Furthermore, we cannot ask colleagues to disclose confidential information about their former employers.
- Q** Is it okay to refer to documents I have from a previous employer?
- A** It depends. If the documents contain confidential information, you cannot use or share them with Newell Brands. You must honor your confidentiality obligations, including any nondisclosure agreements, with your prior employers. If you have questions, ask the Legal team.



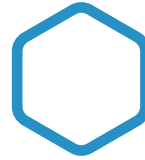
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Ensure product safety

Our consumers rely on us to make high quality, safe products that consistently meet or exceed our Company's high standards. To maintain their trust, you must comply with applicable consumer laws, as well as our Company's policies addressing the safety and quality of our products.

We must promptly address issues with products that do not meet our high standards. If you have concerns about the quality or safety of our products, speak up and report them immediately. Similarly, if consumers express such concerns, forward them to the Legal team. If you are aware of a supplier not upholding a commitment to quality and safety, speak up and report it to our Corporate Social Responsibility team.



Have a question or concern? Speak up, we're listening at [Ethics Hotline](#) or ethics@newellco.com



Avoid insider trading

We may have access to material, non-public (“inside”) information about our Company, or companies with which we do business. Material non-public information is information that is not generally known to the public and that a reasonable investor would consider relevant in making investment decisions. Insider trading occurs when someone uses inside information to gain profits or avoid losses in the stock market. Insider trading is illegal. To comply with the law, never buy or sell stock or other securities on the basis of inside information or provide “tips” based on inside information to others.

What are examples of potential “inside” information?

- Projected future earnings or losses
- Undisclosed financial results
- Planned mergers or acquisitions
- Sale of Company assets or subsidiaries
- Changes in dividend policy
- Changes in executive management
- Significant new product plans or commercial strategies
- Impending bankruptcy or financial problems



Q&A

Q I work for Newell Brands and my brother asked if he should buy our stock. Because of my position, I learned that we will announce a new acquisition which may increase the value of our stock. What should I do?

A Do not share this “inside” information with your brother or provide him with a “tip” that would influence his decision to buy the stock. If you do, both of you would be breaking the law.



1.0 We commit to doing the right thing

2.0 We commit to each other

3.0 We commit to our Company

4.0 We commit to our marketplace

5.0 We commit to our community

Comply with competition laws

We embrace a free marketplace where we compete vigorously and comply with competition and antitrust laws. Competition laws exist in virtually every country and cover many types of activities. The intended purpose of competition laws is to protect consumers and companies by preserving open competition. The penalties for violating these laws may include high fines, not being able to enforce commercial agreements and even imprisonment.

Relationships with competitors

- Do not discuss sensitive business information with competitors including: pricing, sales terms, marketing plans, trade programs, discounts, boycotts of third parties, or proprietary information.
- Do not come to an understanding with a competitor about any competitive matter, including refraining from competing in certain product or geographic markets.
- These types of discussions or agreements may give the appearance of cooperating with competitors instead of being independent.

Terms of sale

You must not participate in agreements or policies that restrict our buyers' resale prices or terms and conditions of sale without legal advice. In countries where our Company has a particularly strong position, consult with the Legal team to ensure that actions related to pricing and selling are not in violation of competition laws.

Q&A

Q I attended a trade association meeting and during a break one of the participants wanted to compare the pricing and rebate programs that our companies offer customers. What should I do?

A If this person is attending a trade association meeting with you, he is likely employed by a competitor. Advise him that you cannot discuss this information with him. You should never discuss pricing or price-related programs with competitors.





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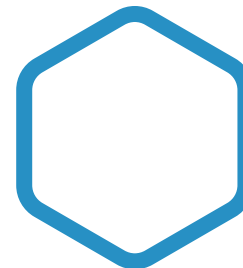
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No bribery

We are committed to conducting business with integrity and do not tolerate any form of bribery or corruption. As a global company, we must comply with the laws of multiple countries as they relate to bribery of both private individuals and public/government officials. Many of these countries' laws, including the Foreign Corrupt Practices Act, apply to conduct both inside and outside of the respective country. Violations of anti-bribery laws can result in lawsuits, substantial fines and jail time for both the Company and the employee.

- Never accept or provide anything of value in exchange for an improper advantage or to obtain/retain business.
- Regardless of local practice, make sure you avoid even the appearance of doing something improper to gain a business advantage.
- Be particularly cautious when dealing with government or public officials, officials of international organizations and political parties.
- Do not give anything of value to a government official or employee without obtaining prior authorization from Ethics and Compliance. The term "government official" should be applied broadly.
- Review our [Anti-bribery and Anti-corruption Policy](#) to understand your responsibilities in complying with relevant regulations.





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No facilitation payments

Our Company prohibits making facilitation payments. Facilitation payments are payments made to government officials in order to expedite official, routine government services.

If you need to make a payment in order to protect your personal safety, notify Ethics and Compliance and Global Security if it is safe to do so.

We are accountable for our third parties

We are responsible for third parties and other agents acting on our behalf. You must not knowingly allow a third party to engage in corrupt practices, including making improper payments, on our Company's behalf. Additional information about when and how to conduct due diligence on third parties can be found in our [Anti-bribery and Anti-corruption Policy](#).



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Q&A

- Q** A Customs office outside of the U.S. is holding a large shipment of our products because there was an error in our paperwork. The Customs examiner asked our customs agent to pay a small cash "fine" in exchange for releasing the product. Can we permit our customs agent to make the payment?
- A** No, you must obtain pre-approval from Ethics and Compliance. If it is not reviewed and documented properly, making a payment to a government official in exchange for the release of our products could be a violation of our Code and the law.
- Q** I have a shipment that must be delivered in a week, but was informed by the Customs office that it will take at least three weeks to process the paperwork. Our logistics vendor said that they can ensure delivery within a week. Can I use the vendor to handle the delivery?
- A** Perhaps, but you must first ask the vendor questions related to the methods that they will use to have the paperwork processed more quickly. You should consult with Ethics and Compliance to confirm that you are asking our vendor all of the appropriate questions.



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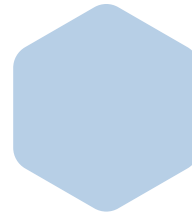
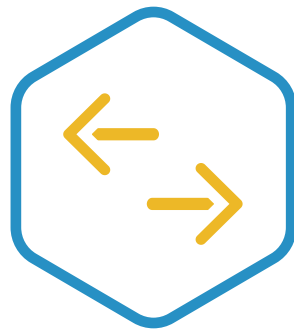
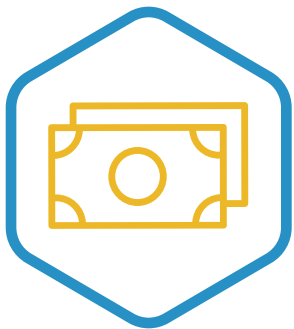
5.0 We commit to our community

Prevent money laundering

We abide by all laws designed to deter money laundering. Money laundering is the process by which funds generated through criminal activity (e.g., terrorism, drug trafficking) are moved through legitimate businesses in order to hide their criminal origin. Never knowingly facilitate money laundering and only conduct business with third parties after you have conducted appropriate due diligence.

Be aware of suspicious transactions

- Payments in cash
- Requests to transfer funds to/from countries or entities that are not related to the transaction or customer
- Payment terms that are inconsistent with our Company's normal terms of business



Q&A

Q A customer asked me to divide a \$10,000 transaction into four payments so that he can avoid having to complete paperwork required by the government. What should I do?

A Advise the customer that you will not split the transaction because it is a violation of our Company's policy. The transaction must be processed for the total amount with all required paperwork submitted to the government. Also, report the request, and any suspicious transactions, to Ethics and Compliance.



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Comply with trade compliance laws

As a multi-national company our transactions often involve moving products across national borders. Trade is heavily regulated, and many governments set rules and regulations to control importing, exporting, and related activities. We must comply with these laws and regulations that govern international trade. Violations of export and import laws can result in severe civil and criminal penalties for the Company and its employees, including imprisonment.

- Export controls restrict or prohibit exports to certain countries, individuals, and entities.
- We are responsible for ensuring that, at a minimum, our transactions are compliant with U.S. sanctions laws.
- If you know, or have reason to believe, that a business partner intends to improperly resell our products, for example in a country that is subject to sanctions or to a third party that is targeted by sanctions measures, notify Ethics and Compliance.
- We are prohibited from participating in any international boycott that is not sanctioned by the U.S.
- Review the [Newell Brands International Export Compliance Policy](#) for additional information on complying with anti-boycott and export regulations.



Q&A

Q A third party asked me if he could distribute our products in Iran. The distributor is based in Iran and appears on the U.S. government Specially Designated Nationals list. Since the products are not manufactured in the U.S., I work outside of the U.S. and I am not a U.S. national, is it ok for me to sell our products to this distributor?

A No. As a U.S. company, we must ensure that our transactions are compliant with U.S. sanctions laws, regardless of where an employee is located. If you have any questions, contact the Ethics and Compliance team.



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5.0 We commit to our community

- 5.1 Protect our natural environment
- 5.2 Source responsibly
- 5.3 Contributions



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Protect our natural environment

Environmental Regulations

Environmental laws protect people and the planet and aid in the preservation of valuable natural resources. Compliance with these regulations protect against harmful impacts to the communities in which we operate and reduces risks to the Company and our employees. Violations of environmental laws may result in high fines, expensive and long-term remediation obligations, restrictions on our operations, injuries to people, and even imprisonment.

- Compliance with laws and regulations is the minimum standard.
- Comply with our corporate environmental standards, which are applicable to all of our operations and ensure uniform practices around the globe.
- If you are unsure about specific requirements, contact the Environmental Affairs team.

Sustainability

As responsible corporate citizens, we strive to protect our national environment and reduce the environmental impacts of our operations. We incorporate sustainable practices into our operations to reduce our use of the planet's valuable resources and our impacts on the environment. These practices include waste reduction and diversion; water conservation; energy conservation; the reduction of greenhouse gas emissions; and the efficient and thoughtful use of materials in operations, products, and packaging. We hold ourselves accountable for implementing these practices by setting public, company-wide sustainability goals.





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Source responsibly

Our responsible sourcing program, which includes both social compliance and supply chain security, aims to increase transparency across our supply chain so we can ensure our customers and consumers receive high-quality and ethically produced or sourced products. Our [Vendor Code of Conduct](#) reflects our expectation that third parties adhere to our rigorous standards on human rights, individual workers' rights, and to all applicable laws. We comply with legislation focused on eliminating slavery and human trafficking from global supply chains, including the UK Modern Slavery Act and California Transparency in Supply Chain Act. Our Company does not permit our business partners to use inhumane labor practices, including forced, compulsory and child labor or physical punishment.





Contributions

Charitable Contributions

As a global company, we take seriously our responsibility to give back to the communities in which we operate. We are committed to making the world a better place and support nonprofit organizations whose missions align with our business, Values and philanthropic priorities.

- We are uniquely positioned to make a difference through in-kind donations of Newell Brands' product, particularly in response to natural disasters and other crises.
- We encourage employees to give back through volunteerism.
- Through the Newell Brands Charitable Foundation's Local Impact Grant Program, employees can nominate and vote on nonprofits to receive funding.
- The Foundation's Matching Gift Program allows employee donations to select charities to be matched dollar-for-dollar by the Foundation, up to a certain limit.
- Prior to committing a donation on behalf of the Company, review the [Newell Brands Philanthropy Policy](#) and follow the process required for review and approval.

Political Contributions

As a matter of policy, we do not use corporate funds to make contributions to support or oppose federal, state or local political parties, candidates, campaigns, ballot measures, political organizations, or social welfare organizations. Any contribution of Company funds or assets for these purposes requires approval by the Chief Executive Officer. Review our [Government Affairs Policy](#) for additional information.

