

# Speak Up and Anti-Retaliation Policy

Maintaining our culture of integrity at Newell is critical to our success as an organization and as individuals. Our commitment to operating with transparency, trust, and integrity means creating an environment where we all feel comfortable speaking up and raising concerns and knowing that, when we do, we'll be heard.

## Why do we have this policy?

Speaking up is not always easy, and we recognize that it can sometimes feel simpler not to get involved. We want all employees to feel a sense of personal responsibility and to believe that raising concerns is the right thing to do. That requires Newell's dedication to making the reporting process safe, trustworthy, transparent, and fair. This policy serves as our commitment to fostering a speak-up culture at Newell. We want you to know when, where, and how you can confidentially ask a question about a Newell policy or raise a concern about suspected misconduct without fear of retaliation. This policy also explains what you can expect from Newell when you speak up.

## Who can speak up?

Anyone who works for or on behalf of Newell or has a business or stakeholder relationship with Newell can rely on this policy. This includes directors, employees, former employees, vendors, suppliers, contractors, and external stakeholders. By speaking up, you give us the opportunity to address issues to continuously improve our approach to doing business with honesty and integrity.

## What is Newell's policy on speaking up?

If you are aware of or suspect misconduct, including any violation of the law, our Code of Conduct, or any other Newell policy, we expect you to speak up using one of the reporting options in this policy. Examples of the types of issues that you should raise include harassment, fraud, theft, bribery, corruption, conflicts of interest, human rights violations, or retaliation.

## What is Newell's policy on retaliation?

**Our policy is simple: We do not tolerate retaliation.**

**Retaliation** is a negative action against someone who, in good faith, raises a concern about a violation of a Newell policy or the law or participates in an investigation. Good faith means being sincere in providing honest and accurate information, even if you turn out to be mistaken. Retaliation is illegal and can occur in different ways, including termination, demotion, salary reduction, harassment, or being assigned less favorable work. At Newell, retaliation is never okay.

## How do I speak up and report a concern?

Speaking up and raising concerns is essential to maintaining our strong culture of integrity. If you are a Newell employee, the best way to raise a concern is to speak with a manager or Human Resources. If you are unable to use either of these options or prefer to remain anonymous, you may use any of these additional channels to raise a concern:

- [Ethics Hotline](#)
- [Newell Ethics and Compliance](#)
- [Chief Ethics and Compliance Officer](#)
- [Chief Legal and Administrative Officer](#)
- [Legal Team](#)
- [Global Security](#)
- [Global Internal Audit](#) or
- A local resource designated to receive reports of suspected violations of the law or Newell policies

While we encourage internal reporting, which gives us the opportunity to address concerns promptly and consistently, we recognize there may be times when you feel that reporting a concern externally is more appropriate. If you raise a concern to an external regulator or other government entity, you will still be protected under this policy. In instances involving threats to life or property, seek emergency assistance or contact local law enforcement or other appropriate authorities.

### **A special note about financial issues**

If you have a concern about financial issues such as Newell's financial statement disclosures, accounting, internal accounting controls, auditing matters, or violations of Newell's Code of Ethics for Senior Financial Advisors, you may also contact the Audit Committee directly by following Newell's process for [Reporting Allegations Relating to Accounting Matters](#). Newell's Chief Ethics and Compliance Officer, in consultation with Newell's Chief Legal and Administrative Officer, will review these reports and present them to the Audit Committee and the Nominating and Governance Committee of the Board.

## What about confidentiality and anonymous reporting?

We are committed to maintaining confidentiality throughout the investigation of every report we receive. When you speak up, we only share information with a limited number of people on a need-to-know basis. We keep details of the case, your identity, and the identity of anyone else involved confidential during and after the investigation. If you have any questions about the confidentiality of a report that you've made, speak with Human Resources or contact Ethics and Compliance at [ethics@newellco.com](mailto:ethics@newellco.com).

Although we encourage anyone reporting a concern to confidentially share their identity so that our investigation can be as thorough as possible, we understand there may be times when remaining anonymous is important to you. The Ethics Hotline accepts anonymous reports in most countries, depending on local law. Anyone who uses the Ethics Hotline to raise a concern can return to their report to provide additional information or check on the status. Our Ethics Hotline is administered by an independent third party and is available 24 hours a day, seven days a week, in multiple languages.

In the U.S. and Canada, call 770-613-6300. For a list of numbers in other countries, visit our Ethics Hotline [website](#), where you can also submit a report in writing.

## What happens when I raise a concern?

We take all concerns seriously and strive to ensure our process is consistent, timely, and fair. When you raise a concern using any of the methods in this policy, our investigation process typically includes the following unless we determine that the best outcome would be achieved by modifying our approach.



Our commitment to maintaining confidentiality continues even when our investigation is complete. Please note that if you report a concern, we will not be able to give you details of the outcome or any disciplinary action taken. This allows us to protect the privacy and legal rights of everyone involved.

## As a manager, how can I support this policy?

All employees and those acting on Newell’s behalf are expected to promptly report any concerns and provide honest and thorough information during an investigation. If you manage or supervise others, you have a special responsibility to lead with integrity by:

- Encouraging our speak-up culture in which everyone feels comfortable raising concerns;
- Escalating reported concerns to Human Resources, Ethics and Compliance, or Senior Management so they can be addressed promptly; and
- Protecting employees by maintaining confidentiality and never allowing or ignoring acts of retaliation.

## What happens if someone violates this policy?

It is a violation of our policy to retaliate, knowingly make a false accusation, interfere with an investigation, lie to investigators, or refuse to cooperate in an investigation. Doing so or otherwise violating this policy or our Code of Conduct may lead to disciplinary action up to and including termination. In addition, Newell executives are subject to criminal penalties, including imprisonment, for retaliation.

## What if I have additional questions?

Newell takes its commitment to corporate governance seriously, and this Speak Up and Anti-Retaliation Policy is an important tool in delivering on that commitment. If you have any questions or feedback about this policy or our Code of Conduct, contact Ethics and Compliance at [ethics@newellco.com](mailto:ethics@newellco.com).



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Bradford Turner  
Chief Legal and Administrative Officer

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**Policy Owner:** Chief Ethics and Compliance Officer

**Executive Sponsor:** Chief Legal and Administrative Officer