

StanleyBlack&Decker		<i>EHS – MS - 001 / 09</i>
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Stanley Black & Decker

EHS Management

System Plan

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STANLEY BLACK & DECKER ENVIRONMENTAL, HEALTH AND SAFETY MANAGEMENT SYSTEM PLAN

1.0 Purpose and Scope

To be recognized as a world leader, Stanley Black & Decker's facilities must become the model for health & safety in the workplace and environmental stewardship. The purpose of this EHS Management System Plan (the "Plan") is to describe the core elements of Stanley Black & Decker's EHS Management System established in accordance with Stanley Black & Decker's Code of Business Ethics (the "Code of Business Ethics") and individual facility needs.

The Plan sets forth the overall strategy and organizational structure to manage Stanley Black & Decker's EHS and CSR programs. The plan is established to ensure best in class CSR performance, and to prevent, or detect and correct; violations of EHS laws and regulations, the Code of Business Ethics, and other applicable standards. Stanley Black & Decker will manufacture, distribute, and market products globally in a responsible manner that protects employees, communities, customers, and the environment. The success of the EHS Management System depends on commitment from all levels of the company. The Plan enables the company and each facility to establish and assess the effectiveness of its EHS compliance program.

To embed our Purpose and to support our Ambitions across our global infrastructure and presence, Stanley Black & Decker is committed to developing EHS-CSR strategies that target socially responsible employee engagement, community involvement, products, services, and operations globally. To achieve this standard of excellence, we have instituted an EHS Management System Plan based on the goals and guidelines of the International Standards of Operation for Environmental Management (ISO 14001 & EMAS), Occupational Health and Safety Management (OHSAS 18001/ISO 45001), the UN Sustainable Development Goals (SDGs), Social Responsibility Standards (ISO 26000) and the SBD Code of Business Ethics. SBD follows the precautionary principle in the application of its management system in that when an activity raises threats of harm to human health or the environment, precautionary measures are taken even when cause & effect relationships are not fully established. These actions include the prevention of injuries, the prevention and elimination of pollution and waste, sustainable energy management, setting context-based water targets and compliance with all relevant legal and other requirements. Further, to enhance the quality of our facility and surrounding communities, Stanley Black & Decker is committed to continual improvement with respect to its EHS performance and to share with our community, suppliers, and customers our results and the best practices we learn. The **bolded** portions of the Plan represent minimum requirements. Non-bolded portions provide additional information to aid in implementation.

2.0 Applicability

This Plan applies to all employees and operating unit locations worldwide, including all manufacturing facilities, distribution centers, warehouses, field service centers, retail, SG&A locations and mobile units ("facilities") of Stanley Black & Decker and its subsidiaries and joint ventures (in which Stanley Black & Decker exercises decision making control over operations). Legal requirements may vary in different countries in which Stanley Black & Decker facilities

are located. This plan must be applied in each country in a manner that complies with the respective legal requirements.

3.0 Responsibility

Stanley Black & Decker's General Counsel is the designated Company EHS Compliance Officer and is responsible for overseeing implementation of the Plan, for overseeing compliance with Stanley Black & Decker's policies, standards, and procedures, and reporting and providing advice to the Chief Executive Officer ("CEO") and the Board of Directors (the "Board") concerning such matters.

The Chief Responsibility Officer is responsible for overall coordination of the Plan and establishing company-wide EHS-CSR goals and objectives. The Chief Responsibility Officer along with the Division Presidents, are responsible for implementation of the Plan, and compliance by all facilities with applicable EHS laws and regulations.

Each Division President is responsible for ensuring that all facilities in their business implement the Plan and that company-wide EHS-CSR goals and objectives are communicated to and achieved by the facilities.

The Chief Supply Chain Officers, Operations Vice Presidents and/or Directors, along with the Division Presidents, are responsible for ensuring that sufficient resources are available to the respective Facility Managers to properly implement the Plan at each facility and to achieve company-wide goals and objectives.

Each Facility Manager or Operations Leader with an equivalent role is responsible for ensuring that their facility complies with applicable EHS laws and regulations, implementing the Plan at their facility and fully integrating EHS-CSR considerations into the day-to-day activity of facility operations. Each Facility Manager will determine the actions necessary for successful implementation of the Plan based on the types and extent of EHS-CSR risks encountered at each location. Each Facility Manager is responsible for supplying sufficient resources to implement the Plan. Each Facility Manager is ultimately responsible for reporting, investigating, and implementing corrective measures for all injuries and inputting them into the EHS website.

Human Resources is responsible for supporting successful implementation of the Plan through the staffing of adequate EHS resources, establishment of policies and systems to ensure accountability to the requirements of the plan, and communication of Code of Business Ethics and Plan expectations and responsibilities.

The Chief Responsibility Officer will assist General Counsel, the Senior Vice President of Human Resources, the Division Presidents, the Operations Vice Presidents and/or Directors, and the Senior Managers in the implementation of the Plan.

Each employee is required to comply with all applicable EHS laws and regulations and the Code of Business Ethics. Each employee is responsible for knowing and following the EHS

practices described to them. An employee having knowledge or suspicion of any condition that is or may be in violation of an EHS laws or regulations or the Code of Business Ethics must immediately report such information to their supervisor, Facility Manager or General Counsel. An employee who feels inadequately trained regarding EHS to perform a certain task must immediately discuss the concern with their supervisor.

4.0 Terms and Definitions

For the purposes of this EHS Management Systems Plan, the terms and definitions given in the ISO 14001 & EMAS, and OHSAS 18001/ISO 45001) standards and ISO 26000 guidelines apply along with the following:

CAP – Compliance Assurance Program

CRO- Chief Responsibility Officer

EHS – Environmental Health and Safety

CSR – Corporate Social Responsibility

EHS MS – Environmental Health and Safety Management System

F&E – Find and Eliminate

JSA – Job Safety Assessment

KPI – Key Performance Indicator

SBD – Stanley Black & Decker

SCA – Sustainable Corrective Action/s

SG&A - Sales, General and Administrative

SPEAR - Strategic Program for Environmental Assessment and Remediation

The term “the Plan” used in this and other system documentation applies to this corporate EHS management system plan.

The term “Facility” or “Facilities” used in this and other system documentation applies to all operating unit locations worldwide, including without limitation, all manufacturing facilities, distribution centers, warehouses, field service centers, retail, factory centers, SG&A locations and mobile units of Stanley Black & Decker and its subsidiaries and joint ventures (in which Stanley Black & Decker exercises decision making control over operations).

The term “Facility Manager” used in this and other system documentation applies to Plant Managers, Regional Field Operation Managers, General Managers, Directors, and all those who have ultimate responsible for a “facility” or “facilities”.

The term “Division President” used in this and other system documentation applies to subsidiary presidents, presidents responsible for a business segment, and all those who have ultimate responsible for a “division or business segment.”

The term “Audit” used in this and other system documentation applies to the systematic, objective assessment of the workplace for compliance with regulatory and internal EHS requirements. This includes External (CAP) audits and any Internal Corporate EHS or Operational

assessment of the workplace, systems, and/or documents to evaluate compliance with EHS expectations.

5.0 Elements of the Plan

5.1 EHS Management System Policy (“EHS Policy”)

Our Purpose: For Those Who Make the World... prepared, protected, and free from harm; (Sustainable); (Safer & Secure); (Socially Responsible).

Our Ambitions: We have defined three overarching ambitions for 2030 which guide our work and support the achievement of the UN Sustainable Development Goals:
Empower Makers - Enable **10 Million** Creators and Makers to Thrive in A Changing World
Innovate with Purpose - Innovate Our Products to Enhance the Lives Of **500 Million** People and Improve Environmental Impacts
Create a More Sustainable World - **Positively Impact** the Environment Through Our Operations

Communication of EHS Plan & Policy

All employees must be made aware of Stanley Black & Decker's EHS Policy and Code of Business Ethics, which communicates to the employees management's concern, commitment, and vision of EHS-CSR improvement and each employee's responsibilities to comply with applicable EHS laws and regulations.

The Code of Business Ethics are central features of the Plan. They establish the standard of performance and provide the framework for setting and reviewing EHS-CSR objectives and targets. They are also useful as reference documents for the enforcement of EHS policies, practices, and procedures.

The Code of Business Ethics shall be reviewed annually with all employees and incorporated into new employee orientations. All exempt employees are required annually to execute a statement certifying that they have reviewed the Code of Business Ethics, they will comply with such requirements, they understand that employment at Stanley Black & Decker is dependent on compliance with such requirements, and they have a duty to report any violations of the requirements.

Human Resources is responsible for communication of [Code of Business Ethics](#) and Plan expectations and responsibilities.

5.2 Resources, Roles and Responsibility

5.2.1 Chief Responsibility Officer (CRO)

The CRO will report directly to the Chief Executive Officer. The CRO (with assistance from Company EHS-CSR Leaders) will provide the overall leadership, strategic guidance, and professional expertise to implement the Plan and meet Stanley Black & Decker's EHS-CSR goals

and objectives. The CRO will:

- Implement a company-wide EHS management system,
- **The CRO will designate Company EHS-CSR Leaders to support EHS governance and EHS Operations execution globally and use appropriate due diligence to ensure that each person selected has the appropriate qualifications.**
- Assume the lead role in working with the facilities and General Counsel on all pending or threatened enforcement actions or claims against Stanley Black & Decker arising under EHS laws and regulations and act as a liaison between facility personnel and attorneys and consultants in connection with regulatory issues.
- Identify EHS-CSR best management practices for implementation on a company-wide basis, as appropriate,
- Develop metrics and analyze performance results,
- Provide strategic leadership, communications, and guidance,
- Ensure a periodic review of risks and opportunities, and scenario planning related to climate change,
- Ensure a periodic update of materiality assessment as appropriate,
- Develop and lead an EHS support network to assist each Facility Manager,
- Provide a score card of overall EHS-CSR performance,
- On a quarterly basis, provide the CEO, CFO, = CHRO, and Division Presidents with a report summarizing the company's EHS-CSR performance,
- Evaluate the effectiveness of the Plan and make recommendations for continual improvement,
- Periodically facilitate a meeting of all Company EHS -CSR Leaders and selected Operations EHS Leaders to discuss developments in EHS laws and regulations, new or modified EHS initiatives, and other relevant matters. A primary purpose of such meetings will be to provide overall direction and guidance to Operations EHS concerning the implementation of the Plan,
- Establish policies and procedures aimed at reducing Stanley Black & Decker's risk of cleanup liability at off-site waste treatment, storage, and disposal facilities, including guidelines regarding waste minimization, site selection and minimization, and due diligence
- Provide guidance on the investigation and/or remediation of Stanley Black & Decker's current or former properties under the Strategic Program for Environmental Assessment and Remediation ("SPEAR") and the assessment of the environmental condition of properties, and compliance status of businesses, that may be acquired.

5.2.2 General Counsel

General Counsel (or outside counsel selected by General Counsel) will provide legal advice concerning EHS-CSR compliance matters and represent Stanley Black & Decker in all pending or threatened enforcement actions or claims against Stanley Black & Decker arising under

EHS-CSR laws and regulations. Facilities will not engage outside attorneys for EHS-CSR matters without prior approval from General Counsel

5.2.3 EHS Governance Leaders

The Governance EHS-CSR Leaders will provide the strategic guidance and professional expertise to implement the Plan and meet Stanley Black & Decker's EHS-CSR goals and objectives.

The Governance EHS-CSR Leaders will:

- Support the company-wide EHS management system by developing and maintaining policies, systems, and governance for assurance of compliance with regulatory requirements and plan expectations
- Provide validation and oversight to compliance with regulatory and Plan expectations,
- Provide global strategic leadership, communications, and guidance including strategic plans,
- Develop metrics and targets and analyze and communicate overall EHS-CSR performance,
- Mentor and develop Operations EHS Leaders and facility teams to execute corporate EHS-CSR strategies aligned with the Plan,
- Identify strategic objectives and provide guidance to Operations to meet such objectives,
- Qualify EHS consultants and maintain approved EHS Consultant list
- Provide guidelines to Operations EHS to specify minimum expectations for EHS skills, expertise, and training.
- Lead execute of EHS-CSR strategies, initiatives and policies at the sector level for non MFG/DC sectors
- Lead due diligence efforts for mergers and new acquisitions
- Lead CSR Pillar strategy and framework
- Lead Compliance Audit Program (CAP)
- Lead external transparency reporting
- Lead SPEAR (Strategic Program for Environmental Assessment and Remediation)
- Develop and maintain EHS web data management system
- See the [RACI](#) for additional responsibilities

5.2.4 Global Operations EHS Leaders

Global operations EHS is headed by the Vice President of Global Operations EHS reporting directly to the CRO. The VP Global Ops-EHS is supported by a team of business and regional Operations EHS leaders. The Operations EHS Leaders will execute EHS-CSR strategies, initiatives and policies at the Manufacturing and DC business and facility level to meet Stanley Black & Decker's EHS-CSR goals and objectives.

The Operations EHS Leaders will:

- Translate governance requirements into business and site-specific targets and goals,
- Ensure that Operations EHS Leaders receive appropriate training,
- Ensure adequate site level EHS staffing, development, training, and coaching,
- Ensure facilities maintain timely, complete, and accurate EHS data on the EHS website,
- Oversee and assist Site EHS Leaders during facility restructuring projects or major process changes to manage significant risks, including verification that required environmental permits are obtained at any facility prior to the installation or modification of equipment or process change,
- Assist Facility Managers in the recruiting and training of Site EHS Leaders,
- Liaison between facility management and government agencies on regulatory issues with guidance and support from Governance EHS and Legal Counsel,
- Coordinate annual EHS audits to support compliance certification, provide oversight of audit corrective actions, and reporting on audit results, as necessary; and
- Identify EHS best management practices for implementation on a company-wide basis, as appropriate
- Lead site and business level rewards, recognition, and promotion program,
- Ensure Governance EHS notification of significant EHS events,
- Ensure compliance with all regulatory requirements including environmental permits through ongoing operations
- Ensure appropriate site level identification, prevention and control of hazards and risks including development of JSA's, WI's and SOP's
- Ensure site level emergency response procedures are created, aligned with governance expectations, and implemented
- Drive integration process and closure of identified activities
- See the [RACI](#) for additional responsibilities

5.2.5 Facility Managers

Each facility must have in place a structure to manage its EHS program. The EHS program should be organized to achieve maximum effectiveness. Organization entails an understanding of EHS roles and responsibilities, appropriate technical staffing, as well as a capability to provide overall strategic direction and support to facility-wide prevention efforts. Each facility will develop a written EHS Management System Plan, which will be reviewed and approved by the Operations EHS Leader and validated by Governance EHS using the EHS Roadmap scoring and validation procedure.

It is recognized that certain facilities, due to their small size and/or nature of operations, will not have the same needs as other facilities, nor the infrastructure to implement the Plan. The Chief Human Resources Officer, along with the respective Division Presidents, will ensure that those

facilities are provided resources, expertise, and other assistance to implement the Plan. Considering this, certain provisions are not directly applicable to such facilities.

Facility Managers must ensure that all employees are made aware of the Code of Business Ethics and that they understand that top management considers compliance with EHS laws and regulations, environmental stewardship, and protecting the health and safety of all employees' top priorities for Stanley Black & Decker.

Facility Managers have primary responsibility for EHS compliance and the implementation of the Plan at their facility. Facility Managers, with assistance from the Company EHS-CSR Leaders and Operations EHS Leaders, must provide overall strategic direction and support to the facility-wide EHS efforts including financial and human resources.

The responsibilities of the Facility Managers are described in this Plan and the EHS Compliance Assurance Letter and generally include:

- Review and approve facility-wide policies, programs, and other initiatives,
- Critically review EHS plans,
- Approve the necessary human and financial resources to administer the Plan,
- Designate site EHS Resources,
- Review the status of on-going programs,
- Provide direction to the site EHS staff,
- Ensure that employees are trained in appropriate EHS procedures,
- Sustain interest and communications in EHS concerns throughout the facility,
- Provide appropriate incentives to managers and employees to perform in accordance with EHS laws and regulations, the Code of Business Ethics, and other standards, including recognition of exemplary performance and consistent enforcement through appropriate disciplinary mechanisms,
- Ensure that appropriate procedures and activities are in place to achieve and maintain compliance,
- Ensure that all agency interactions, NOV's, violations are reported to your designated Corporate EHS Leader; and
- Ensure that injuries are reported and entered in the EHS Website as soon as possible.

5.2.6 Site EHS Leaders

Each facility must have a designated EHS Leader to take responsibility for coordination of the EHS program. EHS Leaders with part-time functional EHS responsibilities must devote sufficient time to the program to provide the necessary staff support for line management to meet the facility's established EHS goals and objectives, and the requirements of this Plan.

Site EHS Leader is responsible for:

- **Advising their Facility Managers on applicable legal and other requirements.**

- Development, implementation and maintenance of policies, programs, JSA's, WI's, & SOP's aligned with EHS Governance expectations,
- Compliance with and understanding of all requirements under the facility's environmental permits and communicating such requirements to facility management,
- Developing, completing, and filing all necessary documentation and/or reports in accordance with applicable reporting and record keeping requirements,
- Completing a compliance calendar for all required activities and reporting obligations,
- Identify, participate in and/or lead agency inspection response requirements,
- Providing regulatory oversight of the operation and maintenance of pollution control equipment and monitoring devices,
- Ensuring the proper classification, management, and disposal of wastes,
- Evaluation of opportunities for waste minimization, full diversion of waste from landfill, reducing energy consumption, conserving water and evaluation of new raw materials or replacements for existing raw materials,
- Identifying and implementing EHS training programs for employees and contractors,
- Coordinating industrial hygiene surveys, safety reviews, hazard analysis, accident investigations, and analyzing trends in injury/illness experience and hazards identified at the facility.

5.2.7 Line Management

The responsibility for the execution of the EHS program is a line management function. Active participation in the program at all levels of the line organization is necessary if program objectives are to be met.

Each facility must ensure that the roles and responsibilities of line management and the EHS staff are clearly communicated and understood. Line managers must understand that they play a significant role in the implementation of the Plan, assisting in conducting audits and routine and frequent inspections, assisting in initial incident investigations, enforcing rules and procedures, identifying improvement opportunities and training employees on EHS aspects of their jobs, and setting an example for EHS engagement and culture.

5.2.8 Product Engineering & Design Teams

Engineering & design teams are responsible for ensuring product sustainability and safety. Product engineering and design teams are responsible for embedding product safety reviews into the new product introduction and engineering design processes. The process for such reviews must be documented and followed in each business unit. Sustainability must also be embedded into ideation processes to support the Products with Purpose pillar of the SBD CSR strategy.

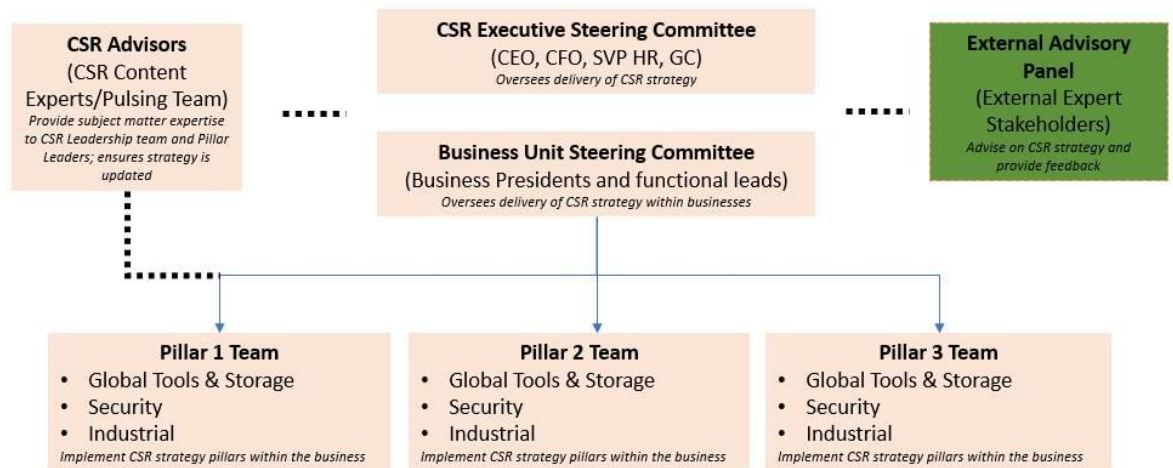
5.2.9 EHS Committee

Each facility will establish an EHS Committee to ensure that line managers and employees are actively involved in hazard assessments, accident investigations, work analysis, EHS training and evaluation of the EHS aspects and impacts of the operation.

The Site EHS Leader will establish the method of selecting employee members; the length of service of members; committee meeting requirements (e.g., frequency, quorum rules, and minutes); the committee's roles and responsibilities, such as the frequency and scope of committee inspections, role in accident investigations; role in hazard notification; and the training of the committee members.

5.2.10 CSR Governance Structure

Responsible for delivery on the CSR strategy requires various levels of oversight across the company, as outline below.



5.3 Authority & Accountability

Each Facility Manager's EHS & CSR performance will be assessed as part of their overall performance review. Key considerations will include EHS compliance, injury rates, Roadmap score, results of EHS compliance audits, degree of implementation of the Plan, progress towards goals regarding energy, water, waste and carbon, and measurable improvement with respect to EHS & CSR performance. The facility's overall KPI score on the Score Card or dashboard (described in section 5.5.1) and increasing or decreasing trends will be considered.

Managers and supervisors of all departments must be held responsible and accountable for the EHS & CSR management practices implemented in their area of responsibility. EHS & CSR performance must be made a key part of line management responsibilities and performance evaluations. This includes performing such functions as area inspections and audits, and

employee training. Job descriptions are a key management tool in assigning accountability. EHS & CSR considerations should be included as a job requirement in all relevant job descriptions, part of performance appraisals, and if applicable, incentive compensation measurements.

5.4 Hazards and Risks & Aspects and Impacts – Assessment, Prevention and Control

Assessment of Hazards and Risk & Aspects and Impacts

Facility Managers, with assistance from Site EHS Leaders and Operations EHS Leaders, must assess inherent environmental impacts and health and safety hazards present in their facility. A structured approach for determining inherent hazards and environmental impacts present at a facility must be developed and implemented. The types and extent of hazards and impacts determine the management systems and internal controls that should be present and functioning to prevent and control those risks. Assessment activities include:

- A determination of the requirements for identifying, understanding, and complying with regulatory requirements and company standards, policies, procedures, and best management practices, and,
- Use of tools such as EHS Roadmap to evaluate current EHS performance relative to location, operating unit and Stanley Black & Decker's corporate goals and objectives, and the factors affecting that performance.

Prevention and Control

Facility Managers and Site EHS Leaders must assess whether the necessary prevention and/or control strategies and systems (e.g., engineering controls, programs, procedures, training, etc.) are in place, inherent risks and impacts are addressed, and the system is functioning effectively. Personal protective equipment will be used only when other controls and systems are infeasible or impracticable. Assessment, prevention and control principles and practices must be applied in the planning, design, and layout of new buildings, processes, products, preventive maintenance activities and/or changes to existing facilities, and products, and in all property transactions in accordance to our Management of Change policy.

[Strategic Program for Environmental Assessment and Remediation \("SPEAR"\)](#)

Stanley Black & Decker's investigation and remediation projects will be managed through the Strategic Program for Environmental Assessment and Remediation ("SPEAR") to ensure a safe and healthy environment for Stanley Black & Decker's employees and neighbors, maximize Stanley Black & Decker's ability to reliably assess environmental liabilities, and create an accountable system for effectively controlling costs.

SPEAR is based on four guiding principles, (1) reinforce business decisions by integrating sound environmental practices, (2) build and leverage partnerships with consultants and outside counsel, (3) develop site-specific plans to achieve project objectives, and (4) manage and track site-specific cleanup strategies to measure project objectives and to control costs and schedules.

SPEAR will be led by the Corporate EHS Director, Environmental Affairs. With few exceptions, all environmental remediation projects will be managed by the Corporate EHS Director, Environmental Affairs. The Corporate EHS Director, Environmental Affairs will qualify and partner with environmental consultants and with outside legal counsel selected by General Counsel. Unless specifically approved by the Corporate EHS Director, Environmental Affairs, no other environmental consulting firm, or law firm is authorized to work on environmental investigations and remediation projects.

5.5 Objectives, Targets and Programs

The CRO annually provides a three-year strategic plan to the CEO, CFO and the CHRO which they will use to establish Stanley Black & Decker's overall EHS-CSR goals, objectives, and action plans for such period. This plan will remain aligned with our overall EHS-CSR strategy.

Performance is not only measured by numerical goals but more importantly the implementation of activities, programs, and development of internal controls necessary to achieve those goals. The actions/objectives proposed to achieve goals form the basis for an annual action plan. The plan will be in writing and the goals and objectives will support the Code of Business Ethics and Stanley Black & Decker's overall corporate goals. The action plans developed for this purpose will clearly define responsibility and accountability for completion. The three-year strategic plan will guide the Senior Managers with respect to facility EHS-CSR goals, objectives, and action plans.

Each facility must establish written EHS goals, objectives, targets, and programs. Each facility will develop a written action plan, consistent with Stanley Black & Decker's three-year strategic plan, to accomplish its goals and objectives.

Operation EHS leaders will assist the facilities with the identification of EHS goals and objectives, which shall be measurable to the extent practicable, and development of action plans.

5.5.1 EHS Roadmap

The EHS Roadmap provides a path of work to implement the EHSMS Plan, maintain compliance with legal and other requirements, ensure continuous improvement, and demonstrate world class performance. The Roadmap score provides a numeric evaluation of the facility EHS Management system maturity. Roadmap scores help the sites, the businesses, and the Corporate EHS team to identify those areas that may require additional resources. It also reduces program variability between facilities and advances best management practices throughout the organization. The numeric scoring aspect of the Roadmap allows each facility to gauge its performance against the rest of the company or a business group average.

Roadmap Emphasis Program

Periodically, and at the beginning of each calendar year, the Corporate EHS team shall identify sector specific 'Emphasis' roadmaps. The roadmaps will serve as a pathway to exceeding

regulatory compliance and creating world class management systems committed to continuous improvement.

Each emphasis roadmap shall be selected based on data driven high consequence activities, consultation with internal stakeholders, legislative frameworks, and industry trends. Once the full range of emphasis roadmaps have been selected and released, it shall be the responsibility of Operations EHS to provide the necessary resources to ensure robust and uniform programs are developed and delivered in a timely manner. A scorecard is provided to measure progress. No other roadmap shall be accessible for verification until a minimum score of 3 is achieved across those selected emphasis roadmap programs.

5.5.2 EHS Scorecard

The EHS Scorecard provides visibility of qualitative and quantitative results by facility. Data related to identified Key Performance Indicators is translated into EHS Scorecards depicting monthly, annual, year-over-year, and ongoing performance results.

Scorecards have been developed for each sector, region, business, and sub-business. EHS Scorecard tools include real time links to reports by business, segment, region, and sector. These three Scorecards roll up into the overall EHS Scorecard.

The KPI Scorecard measures each facility's performance against the established quantitative goals. The Roadmap Scorecard measures EHS program development and implementation and compliance with the EHSMS Plan. The Audits and Awards Scorecard incentivizes sites to achieve external recognition for their EHS efforts. The LEAP Award Scorecard measures achievement of the LEAP award criteria for Bronze, Silver, and Gold Star EHS Awards.

5.5.3 ECOSMART

Stanley Black & Decker strives to be a global sustainable business leader. To lead in the field of sustainability, sustainable thinking must be incorporated into every aspect of the company. A crucial component in minimizing Stanley Black & Decker's environmental impact is assessing the environmental footprint of the company and identifying opportunities for improvement, particularly regarding improvements in energy, carbon, waste, and water reductions.

The ECOSMART program incorporates assessment and improvement activities into our operations globally by ensuring funding for sustainability projects and awarding recognition to facilities, business units, or teams that implement impactful projects aligned with our sustainability commitment.

Session Find and Eliminate

Each year, Manufacturing and Distribution Sites must prepare and present a tactical annual path of work to achieve the site's Sustainability and injury reduction goals. The Session F and E will also serve as an avenue to address key Safety and Health Initiatives and to share Best Management Practices as a part of the ECOSMART program. Sites identify specific projects

aimed to improve site sustainability. The site Manager will present the plan to the Business Segment Vice President and Directors, Corporate EHS, Operations EHS, the site EHS support, and any supporting site personnel.

5.5.4 [Sustainable Corrective Action](#)

The Sustainable Corrective Action Program provides the framework for post-incident reviews of corrective action plans developed for recordable injuries, regulatory non-conformances requiring report to a regulatory agency, significant near miss incidents, significant environmental releases, exceedance of regulatory permit conditions or significant or complex audit findings.

The purpose of the Sustainable Corrective Action Review is to ensure that corrective actions identified for the incident are adequate, effective, and sustainable to prevent future incidents. Operations EHS is responsible for ensuring that Sustainable Corrective Action Reviews are conducted no sooner than 6 months and no later than 9 months from the original incident date. Depending on the severity and complexity of the event, a second post review may also be conducted. The site is responsible for establishing the time and place of the review.

5.5.5 [Corporate Social Responsibility](#)

SBD has evolved its focus in EHS to incorporate CSR to activate our broader purpose in society. This strategy aligns with the United Nation’s 2030 Sustainable Development Goals. The strategy is underpinned in three pillars, “Empower Makers”, “Innovate with Purpose”, and “Create a More Sustainable World” and includes 11 goals to be achieved by 2030.

Inspiring Makers and Innovators to Create a More Sustainable World

Pillar 1 - Empower Makers	Pillar 2 - Innovate with Purpose	Pillar 3 - Create a More Sustainable World
<p>2030 Ambition: Enable 10 million creators and makers to thrive in a changing world</p> <p>Goal 1 Employee Career Mobility: Prepare employees for career mobility relevant for Industry 4.0 by supporting them in re-training and re-upsking</p> <p>Goal 2 STEAM Education: Enable people to access STEAM education and training to improve livelihoods and help support the workforce of tomorrow</p> <p>Goal 3 Vocational and Trade Skills: Help people develop cutting-edge vocational and trade skills required for employment</p> <p>Goal 4 Makerspace Training: Enrich the education, creativity and hands-on job experience for people through makerspaces around the world</p>	<p>2030 Ambition: Innovate our products to enhance the lives of 500 million people and improve environmental impacts</p> <p>Goal 5 Addressing Unmet Societal Needs: Deliver innovation with purpose - projects which address unmet societal needs, improve the lives of 500 million people, and contribute 10% of SBD revenue</p> <p>Goal 6 Circular Design: Design products for circularity across material selection, use and end of life considerations</p> <p>Goal 7 Sustainable Supply Chain: Source all raw materials, finished goods, components and services from suppliers that meet environmental and social sustainability criteria; reduce supply chain emissions by 35% by 2030, based on a 2017 baseline</p> <p>Goal 8 New Business Models: Decouple revenue from resource use by increasing the share of revenue from services vs. products</p>	<p>2030 Ambition: Positively impact the environment through our operations</p> <p>Goal 9 Carbon Positive Operations: Set science-based carbon reduction targets by 2016 and become carbon positive in our operations</p> <p>Goal 10 Sustainable Water Use: Sustainably use water by mapping water risks and setting context-based targets</p> <p>Goal 11 Zero Waste to Landfill: Achieve zero waste to landfill in operations</p>

Empower Makers

Industrial and technological innovations are rapidly changing the nature of work and jobs. We recognize that our own workers, as well as those in the communities where we live and work, will require education, learning, upskilling and experience to ensure they can thrive in this new context. We are committed to helping employees and people of the world gain the skills and expertise needed to secure jobs and revitalize communities, which is why we have a goal to enable 10 million creators and makers to thrive in a changing world by 2030.

Innovate with Purpose

We make products and services that help create and shape the world and can partner even more broadly to create new solutions to meet global societal needs. Matching social impact to our business presents new and exciting commercial opportunities. Through our work, we aim to improve the positive, societal impacts of our products across their lifecycle, including design, use and end of life. For these reasons, we have a goal to innovate our products to enhance the lives of 500 million people and improve environmental impacts by 2030.

Create a More Sustainable World

Demand for already constrained resources continues to rise as does the economic impact of environmental degradation. Climate change represents a debilitating threat to society as well as a business risk for the private sector. Our sustainability initiative no longer simply seeks to reduce negative impact, which is why we set a goal to positively impact the environment across our footprint by 2030.

5.5.6 Key Safe Behaviors and Behavior Based Observations

Key Safe Behaviors (KSB's) and Key Environmental Behaviors (KEB's) set expectations of all employees within Stanley Black & Decker. KSB's are minimum acceptable standards where failure to comply with required behaviours may result in injury or ill health. Operations EHS and Site EHS Leaders are responsible for ensuring that KSB's are communicated and adhered to by all SBD employees, contractors, and visitors.

Behavioral Based Observations: A specific Roadmap outlines the requirement for a Behavioral Based Observation program at operational sites. The intention is to ensure effective 'peer on peer' observations: to promote safe behaviors, correct unsafe behaviors and promote a strong 'safety culture' within the operation. Operations EHS and Site EHS Leaders are responsible for ensuring that each operational facility has prepared a path of work to assess readiness and implement a BBO program.

5.6 Legal and Other Requirements

Compliance with EHS laws and regulations, the Code of Business Ethics, established rules, procedures, EHS standards and practices must be enforced by the Senior Management and line management.

Each facility must consistently and visibility enforce Stanley Black & Decker's policies, standards and procedures through appropriate disciplinary mechanisms in accordance with applicable corporate policies, including, as appropriate, reprimand, probation, suspension, reassignment, demotion, termination, and reporting individuals' conduct to law enforcement authorities.

5.6.1 [Global Minimum Standards Policy](#)

The EHS Standards and Minimum Operating Requirements have been developed to ensure

employees and others working on the behalf of Stanley Black & Decker (SBD) are informed of the minimum requirements for safe and compliant EHS behavior. All employees located in SBD locations or engaged to work at Client Sites on behalf of SBD worldwide must comply with these standards and regulations to protect the environment, their safety and the safety and welfare of their co-workers.

The SBD EHS standards do not override any local, state, regional, provincial, or country EHS legal requirements; but instead serve to generally support the EHS compliance efforts of SBD. In addition to implementing the SBD EHS Standards, all SBD facilities must develop a comprehensive list of EHS legal requirements and develop systems and controls to ensure compliance.

5.6.2 Use of Restricted Materials

Restricted Materials are specific materials that are prohibited, restricted, or controlled in manufacturing or in products. The purchase and/or use of restricted materials in our products is prohibited. Regardless of legal requirements, all EHS assessments shall include a review of risks related to the current or historical use, storage, or disposal of restricted materials at the facility. Governance EHS Leaders review and liaise with the relevant commercial, sourcing, engineering, and operations functions to make sure they are aware of product-related environmental laws, rules and regulations applicable to manufacturing, distributing, marketing and disposing of products and chemicals.

5.7 Evaluation of Compliance

The Stanley Black & Decker commitment to compliance is executed by establishing, implementing, and maintaining a periodic evaluation of all applicable legal and other requirements for all operations globally.

5.7.1 Compliance Audit Program

Routine facility audits and inspections are supplemented with periodic formal compliance audits by outside consultants under the guidance of legal counsel pursuant to Stanley Black & Decker’s Compliance Assurance Program (“CAP”). In accordance with the CAP, Senior Managers must submit annual EHS Compliance Assurance Letters and note any approved compliance exceptions (where applicable) to the General Counsel certifying that facilities that have been audited within the past calendar year are in compliance with EHS laws and regulations and Stanley Black & Decker’s policies and procedures, or that the activities to achieve compliance have been identified and will be completed.

5.7.2 Internal Inspections and Audits

Internal Governance EHS audits will be developed to monitor the on-going suitability, adequacy, and effectiveness of the Plan. All processes and sections of the standard would be included. The status and importance of the activities being audited, (along with other KPI indicators, risk assessments and previous audit results), will determine the frequency of the

audit. Internal auditors are required to be qualified based on education, training and/or experience and must be independent of the activities being audited.

Routine self-evaluation of EHS compliance is conducted on a continual basis by Facility Managers and EHS Leaders to identify non-conformances and implement corrective actions.

Each facility must develop a checklist of those items requiring periodic review, which should include inspections mandated by law and other inspections as determined by the facility. The facility must apply a risk assessment approach to demonstrate that each non-conformance is addressed, employees are consulted, significant hazards are controlled, precautions are reasonable, and remaining risk is low.

5.7.3 Agency Interactions & Notices of Violation (NOV)

All Agency Interactions and potential NOV's must be reported immediately to the respective Business Unit VP of Operations, VP Ops EHS, Business EHS and Governance EHS-CSR Leader. Governance EHS has responsibility to manage all agency NOV's, negotiations and settlements in collaboration with Legal Counsel. An agency interaction is a written or verbal inquiry from an outside local, state, or federal environmental, health, or safety organization. It also includes any on-site inspections or visits from these agencies.

Police, emergency medical response, and routine regulatory reporting are not normally included in the Agency Interaction and Notice of Violation Policy unless related to an EHS issue.

An NOV is a written finding or multiple findings from a regulatory agency or body that violate an EHS law, regulation, rule, or decree. It may be communicated in a variety of formats including a notice of citation, inspection report, contravention, or improvement order. This document will indicate the violated law, rule, or regulation. It will normally include a process to eliminate or reduce the severity of the NOV through a contest or appeal procedure. The NOV may also have an associated fine or penalty. All potential NOV's will be reviewed on a case-by-case basis by Corporate EHS-CSR and Legal Counsel.

All agency interactions and NOV's must be entered into the EHS Website, updated as needed, and closed when interaction is considered complete and no further action is expected. Any follow up visits, letters or phone conversations to a previous interaction will be updated on the original interaction. Agency interactions are tracked and reported on our EHS Key Performance Indicator (KPI) scorecards and dashboards and communicated in monthly Business EHS Summary reports.

5.8 EHS Training, Competence & Awareness

Specific EHS training and education initiatives must be developed to address inherent risks present at each facility, field service, retail, and SG&A location. Initial training must include an orientation to the facility's EHS program and job-specific training. Training must also be initiated when employees transfer to new jobs or before operating process changes. The facility must develop procedures for training temporary employees, contractors or others who

work on behalf of the company. Refresher training must be performed periodically as required by law, best management practice or after any EHS incident.

A competence matrix is to be created by each site, identifying which training by job; also, a training plan matrix must be established annually that outlines who will be trained, the training topics and the date(s) that training will be conducted. Documentation validating that the training has taken place must be maintained at the facility. These records must include as a minimum:

- Sign-in-sheets
- Date(s) of training
- Training course syllabus (e.g., a course outline)
- Verification and competence testing for regulatory training (e.g., test, documented observation)

Minimum EHS Training Requirements:

All employees must understand SBD's EHS Management Plan, and their role in it. At a minimum, training programs must meet all applicable legal requirements and must include: Management Training and Education (including supervisors):

- Outline of EHS compliance policy,
- Identification of inherent EHS hazards and risks at the facility,
- Identification of significant environmental impacts at the facility,
- Overview of relevant EHS laws and regulations,
- Roles and responsibilities of supervisors and line employees in the EHS program; and
- Education and training required by law for employees.

Employee Training and Education

- EHS procedures specific to performing each job or task,
- Employees' EHS responsibilities and involvement in the EHS program,
- Handling and disposal of all toxic or hazardous substances and wastes,
- Reporting requirements and mechanisms for EHS incidents and violations of regulations and company standards; and

Contractors

- Outline of EHS compliance policy,
- Identification of Facility Specific Aspects and Hazards

Professional Training and Education

- **Corporate, Operations, and Site EHS Leaders must enhance their professional education and skills through continuing education. EHS Leaders must develop sufficient**

technical skills, training, and expertise to assess EHS conditions and to consult and advise management of appropriate prevention and control strategies

5.9 EHS Communication and Consultation

5.9.1 Internal Communication

Company EHS-CSR will establish and maintain a system to communicate pertinent EHS-CSR information to Executive Leadership, Operations Leaders and Operations EHS, including information on the company's EHS performance, legal and regulatory developments, and implementation of the Plan. Company EHS-CSR will maintain Stanley Black & Decker's web-based EHS measurement and information management system "EHS Website". This system is comprehensive, automated, and designed to streamline and greatly accelerate critical EHS data-gathering and data-processing functions. The EHS Website contains records indicative of each facility's EHS performance, including, without limitation, Roadmap scores, audit findings and corrective action tracking, injury and illness reports, and other records to facilitate oversight provided by the Senior Management and Company EHS-CSR.

Each facility must establish an on-going means of communicating EHS issues and information. This should include positive progress in the prevention of EHS incidents and records of compliance, as well as information on spills, EHS incidents, injuries and illnesses, violations of regulatory requirements and/or company standards, waste minimization, energy conservation and water conservation, etc. The communications system should include periodic scheduled EHS meetings held by Senior and line management.

Each facility must implement procedures to receive and respond to EHS complaints and/or concerns. The facility should establish mechanisms for internal reporting, without fear of retribution, of potential EHS incidents or noncompliance to line managers, the EHS Leader or Senior Management. Reporting mechanisms, to the General Counsel and Corporate EHS-CSR Leaders, must be communicated to employees and assurances given that reports will be handled in a confidential manner. Line managers, EHS Leaders and Senior Management must treat all reports seriously and confidentially. More information can be found in the [Incident Notification Matrix](#).

5.9.2 External Communication

Any Stanley Black & Decker employee, who receives a request for EHS information or a statement of EHS concern or complaint is to notify the CRO and Corporate EHS-CSR Leader prior to responding to the inquiry. The Site EHS Leader will create a record of the external communication by recording all communications within the Stanley Black & Decker Agency Interactions Log on the EHS Website.

A copy of this Plan or information pertaining to the EHS Policy will be provided to external interested parties upon request and with approval of the CRO.

Stanley Black & Decker will continue to communicate its EHS performance publicly through the Carbon Disclosure Leadership Index, Dow Jones Sustainability Index (DJSI), Bloomberg Climate

Innovation Index, and other selected reporting systems. Stanley Black & Decker will post its EHS reports on the Stanley Black & Decker external website www.stanleyblackanddecker.com under the “sustainability” page.

Consultation

The Chief Responsibility Officer will qualify all EHS consultants. Stanley Black & Decker will partner with and retain only such pre-qualified consultants. The Chief Responsibility Officer will develop and implement the necessary programs to qualify EHS consultants.

Benchmarking

Corporate EHS will periodically participate in benchmarking studies and various industry working groups and roundtables concerning EHS practices and systems with companies considered as business leaders regarding EHS. Corporate EHS-CSR will perform an annual review of feedback from external rating agencies to identify gaps and determine how to adjust EHS & CSR strategy accordingly

5.10 Operational Controls

Facility Managers and Site EHS Leaders have the responsibility to develop compliance procedures, manuals and other materials appropriate for their facilities to identify how employees and contractors are to meet the requirements of EHS laws, regulations, permits, enforceable agreements and other sources of authority for EHS requirements.

Each facility must maintain its equipment to ensure effective operations and EHS performance. Job Safety Assessments (JSA's), Work Instructions (WI's) and/or Standard Operating Procedures (SOP's) shall be established and maintained in areas related to significant environmental aspects and health and safety risks, where their absence could lead to deviations from this Plan. New activities and processes are reviewed for EHS impacts and risks. Monitoring and measurement equipment must be calibrated and verified at defined intervals. The SOP's or JSA's are documented and contain operating performance criteria including stipulating operating criteria where the absence of such information could have an EHS impact. The facility will ensure that all contractors, visitors, suppliers or others whose work on behalf of the company can impact the significant environmental aspects and health and safety hazards are provided relevant procedures and requirements related to those areas.

5.10.1 Performance Measurement and Monitoring

Facility EHS performance is summarized within the EHS Scorecards. A variety of different metrics are averaged to determine a facility's final scores. The scores are used to rank each facility against other facilities. The EHS Scorecards are updated by each facility frequently to enable directors and corporate EHS managers to detect trends which may identify the need for proactive management.

Each facility shall establish and maintain documented procedures for monitoring and measuring

the key operational control characteristics of identified activities and services that can have a significant impact on the environment or present a significant health and safety hazard or risk. The EHS Leader will ensure that the manufacturer's recommendations regarding frequency of calibration and calibration and maintenance methods are followed whether the equipment is calibrated internally or by an outside vendor.

5.10.2 Emergency Preparedness and Response

Emergency response and contingency plans must be prepared to address the potential failure of primary prevention and control measures. Each facility shall establish and maintain procedures in accordance with applicable laws to identify the potential for and respond to accidents and emergency situations, and for preventing and mitigating the EHS impacts that may be associated with them. The facility shall periodically test such procedures where practicable and/or required by law. Emergency response, contingency, and business continuity plans may also be evaluated based on an operation's FM Global score, results of climate-related risk analysis, or basin and operational water risk assessments

5.10.3 EHS Incident Management

Each facility must implement procedures for incident reporting and investigation. EHS incidents (identified below) must be immediately reported to and investigated, as appropriate, by the Site EHS Leader, with support from line management. A record of incident investigations must be made, corrective action determined, initiated, and reported to the and Operations Leaders and Corporate EHS-CSR Leader. The Sustainable Corrective Action program must be followed for all incidents listed in the Objectives, Targets, and Programs section, that require post review.

All safety incidents shall be recorded on the SBD website as soon as practical. Guidance for determining Incident Type and Incident Severity are included in the guidance document (Definitions of Recordable). All Incident Types classified as Life Changing shall be reviewed by the Accident & Incident Council and agreed upon by a simple majority of all members. Representative of the impacted business and/or region must be present during the determination phase. CRO will have the final determination. As a minimum, incident investigations must be performed for all EHS incidents as required under applicable laws and regulations and those involving spills or unpermitted releases of hazardous substances, injuries to employees or contractors, or incidents requiring notification to regulatory agencies. Additionally, near-misses of incidents deemed by management to be potentially serious, i.e., serious injury, uncontrolled environmental release, or other significant impacts, should also be investigated.

All investigations shall include:

- An assessment of nature of the incident, scope of investigation and root cause analysis
- The means for implementing corrective actions to prevent recurrence; and
- Reporting to management and appropriate regulatory agencies.

The Four-Block investigation template provides a standardized classification of any incident, a

determination of its direct and indirect (root) causes, and corrective actions related to health and safety programs, program standards, and conformance to standards.

The Incident Tracking Tool (SCAT analysis) located on the EHS Website should be used during this investigation process. This tool gives standardized classification of any incident, determination of its direct and indirect (root) causes, and corrective actions related to health and safety programs, program standards, and conformance to standards

Reference the [Incident Notification Matrix](#) when determining immediate notifications for the **following types of incidents. These include injuries to employees, contractors and others working on behalf of the organization.**

- Inspection or facility visit by any regulatory agency
- Spills or other unpermitted releases of pollutants, wastes or other hazardous materials, including the discovery of potential historic releases or waste disposal
- An EHS incident which has the potential to result in immediate harm or could reasonably be expected to attract media, public or regulatory attention
- Accidents that result in injuries that require hospitalization or fatalities
- Lost-time accidents
- Near miss incidents that could have resulted in loss of life or serious injury
- Any government request for information
- Government enforcement actions or third-party claims
- Notice of events of noncompliance with EHS laws and regulations, including permit violations
- Notice of potential criminal misconduct, including without limitation, falsification of reports or monitoring data.

The CRO will assume the lead role in working with General Counsel with respect to all such incidents.

Facility Management and, or Line Management must complete an investigation of all spills, unpermitted releases and lost-time accidents and report the results to Corporate EHS-CSR within 24 hours and provide written follow-up discussing the root cause and corrective actions within five business days. The Senior Manager will also report on measures taken to ensure that the problem does not recur.

Accident and Injury Council

The Accident and Injury Council is comprised of Tier 1 Corporate EHS staff meets as needed. The first purpose of Accident and Injury Council is to trend accidents, injuries, and incidents, and to establish new goals and compare actual performance versus stated goals. The AIC will determine new programs and revisions to existing programs to improve injury reduction efforts. The council will also be responsible for reviewing and validating previous sustainable corrective action reviews and follow-up with the results. The output of the AIC is to set direction of SBD injury and illness programs across the enterprise. The second purpose of the AIC is to review previous injuries as a review board to establish the correctness of recordability status and to ensure consistency with SBD guidelines and practices globally. The Corporate Workers' Compensation Manager is responsible for

making the final decision on an injury's recordability status. The AIC shall develop communications to the organization on results and any new direction of SBD for programs and policy correction on recordability issues.

Injury and Claims Management – U.S. Only

The U.S. claims management process ensures that workers who are injured on the job receive appropriate care and compensation. The EHS Website allows all facilities to enter incident data and submit a claim to the insurance carrier. The injury and claims process involves the monitoring of all incident investigations and results, total cost per claim, return-to-work and transitional duty, monitors medical providers in and out of networks, and claim closures. The Site EHS Leader communicates with the medical provider and provides all job descriptions to aid in the return-to-work process. The claims adjuster and Site EHS Leader review claims monthly to ensure the employee is progressing.

5.10.4 Nonconformity, Corrective and Preventative Action

To ensure the highest level of safety and sustainability, policies and practices of every site should be uniform, unless specific situations prevent conformity, and should act in accordance with Governance EHS objectives. EHS MS non-conformances are identified through activities such as internal audits, employee observations, agency interactions, management review, and other review activities. Each facility will report on actual or potential non-conformance. The facility will investigate the cause of the nonconformance, determine the corrective or preventive actions to be taken, and follow up to ensure the corrective and preventive actions have been fully implemented. Five why's, fish bone diagram or other acceptable analysis process can be used to determine the root cause. If there is objective evidence that the corrective and preventive actions are complete and that they are effective, the facility can close out the nonconformance.

Where corrective action and preventative action identifies new or changed hazards or the need for new/changed controls, the facility shall perform a risk assessment. Corrective action or preventative action shall be appropriate to the magnitude of the risk encountered. **The facility must record and communicate the results of corrective and preventative actions taken.**

5.10.5 Management of Change

Management of Change is a formal assessment of all procedures, plans, and systems prior to a "change" to ensure that negative EHS-CSR impacts and risks will not result from changes in processes, raw materials, equipment, or facilities. A "change" is defined as additions, subtractions, and/or modifications to processes, raw materials, equipment, or facilities. Even an apparent minor change may have significant consequence if not appropriately managed. This process is intended to consider these changes at the planning stage and avoids additional risks such as nonconformities, NOVs, fines, or injuries, and the unnecessary costs needed to mitigate hazards at a later stage.

Facility, Equipment and Process Changes

The Facility Manager is responsible for ensuring that all necessary permits are obtained prior to the construction of new facilities or installation or modification of equipment or processes that will alter the type or quantity of air, hazardous waste, storm, or wastewater discharges and notification of Corporate Governance EHS staff prior to conducting such activities. Operations EHS is responsible for ensuring compliance with all regulatory requirements, including permitting, during any operational change.

New Construction and Expansion

Any new construction or expansion of existing facilities shall be done with input from the Corporate Governance EHS and align with EHS Guidelines to incorporate best management practices and sustainability features to the extent possible.

New Product Development and Process Design and Modification

EHS implications will be considered in new product development and process design and modification. As set forth in the Code of Business Ethics, SBD will evaluate all potential EHS impacts in corporate decision-making with a view to enhancing conservation of energy, water and natural resources, pollution prevention, utilizing, wherever possible, environmental friendly materials and processes in the manufacture of products, in product packaging and in operating our facilities, and to provide a healthy and safe workplace for all employees. Those principles will be adhered to in new product development and process design and modifications.

Facility Decommissioning

An EHS Operations Leader will coordinate all plant decommissioning projects. In connection with the shut-down of owned and leased facilities, the respective Operations EHS Leader with assistance from a partner consultant will produce a list of environmental action items that need to be addressed as part of the overall site decommissioning program. These action items include the removal of unused chemicals, surface cleaning of paved surfaces where necessary, and decommissioning of plating line tanks, and other equipment. The Operations EHS Leader will prepare a project monitor to address the environmental action items. The Operations EHS Leader will review this list with the designated facility manager and develop a schedule and budget for addressing each item. The Operations EHS Leader and facility manager will designate the person/party responsible for completing each action item.

The Operations EHS Leader and Facility Manager will identify any ongoing reporting requirements for the site such as the filing of Form Rs, air emissions monitoring, SARA Title III Section 312 reports, RCRA biennial reports, and financial assurance in the following year. The EHS Operations Leader will develop a tracking system to ensure that these ongoing requirements are met.

The EHS Operations Leader and facility manager will assemble a facility deactivation binder to document environmental site conditions at the time of transfer or closure. The binder serves

as the consolidated reference of all deactivation information. It will include results of the Phase I/Phase II investigations as well as any remedial measures taken to address an issue of environmental concern. It will also contain permit cancellations and regulatory notifications, as well as photographic and video documentation of site conditions. The binder will also contain a listing of historical contacts for the site and the ultimate location of the site's EHS related files. Once the binder is complete, it must be maintained by the Operations EHS Leader (or designated person) for a period of two years. Following the two-year period, the deactivation binder will be placed in the Corporate Archives.

Project leaders must engage the Operations EHS Leader early in the transfer or closure process.

Integration

Operations EHS will lead all efforts in connection with the integration of a company or business. The respective Operations EHS Leader will ensure all open items from due diligence are tracked to closure. An integration checklist will be used to address all EHS action items. The Operations EHS Leader will review this list with the integrated facilities and will develop a schedule to aid in the completion of these items. The hiring or assignment of appropriate EHS resources is paramount to a rapid and successful integration. The integration plan shall include the incorporation of SBD standards, policies and processes into the daily operations of the acquired merger/acquisition. An integration training tool will also be used to help educate the integrated facilities on Stanley Black & Decker EHS MS, policies, procedures, Scorecard, Roadmap, etc. Typical timeline for integration is 12 months or less.

5.11 Documents, Records, and Data Management

Each facility must prepare and maintain records indicative of its EHS performance. These records should include:

- Documents and records required by applicable laws and regulations.
- EHS training and meeting records.
- Incident investigations and corrective action reports; and
- EHS self-inspection/audit reports and corrective action reports.

A system must be established at each facility for managing documents prepared in support of the EHS program. Facilities must establish direct responsibility of maintaining these records as well as a protocol for responding to inquiries and requests for release of information.

Maintenance of records related to the facility's EHS program is a critical component of that program. The following issues should be addressed and included in the documents management system:

- Confidentiality
- Security
- Access
- Retention
- Preservation for potential or pending litigation

- Availability
- Storage Back Up Requirements; and
- Distribution
 - Employee
 - Facility management
 - Operations and Corporate Governance EHS

The Facility Managers will be responsible for the implementation of the policy.

5.12 EHS Management Review

The CRO will periodically evaluate the effectiveness of the Plan and the need for modifications and will report their findings to the Chief Executive Officer and Division Presidents. If the findings are materially impactful, they will report to the General Counsel.

General Counsel may, at their discretion, retain an independent expert to audit the Stanley Black & Decker EHS MS Plan.

Provisions must be made at each facility for the annual evaluation of the EHS program. The review of the EHS program at the corporate and facility levels shall address the possible need for changes to the EHS program considering EHS management system audit results, CAP and Roadmap results, changing circumstances and the commitment to continual improvement.

Revision Log

REVISION HISTORY

REV	DATE	DESCRIPTION OF CHANGE	NAME
00	09/19/01	Initial Release	Kevin Nelson
01	7/26/10	Re-write and overall update	Kathryn Hinckley
02	11/3/10	Update to section 13 EHS Incident Investigation. Added verbiage related to contactor incidents and others working on behalf of the organization	Kathryn Hinckley
03	9/21/2012	Updated based on Thompson and Hine LLP review	Andy Kolesar & Kathryn Hinckley
04	11/18/2014	Updates to agency interactions/notices of violation section, integration, restricted materials and an overall update to plan.	Alan Wasserman, Ralph Larrubia, Colin Thirlaway, Deb Geyer and Kathryn Hinckley
05	5/2/2017	Updated Elements 2a, 7(a-c), 9(d,e), 13, 17(c). Added 13a, Definitions of Severity Guidance Document and Plant Managers Checklist Guidance Document (separate documents).	Colin Thirlaway, Allie Valenti, Ralph Larrubia, Don Tyler, Deb Geyer, Jackie Molina, and Kathryn Hinckley.
06	3/29/2018	Updated Element E "Elements of the Plan" to reflect our Purpose and our 2030 Ambitions	Joe Adams
07	03/13/2019	Added Table of Contents, updated "Code of Business Ethics" throughout, added Precautionary Principle explanation (E1), added frequency of materiality assessment & climate scenario analysis (E2a), added CSR responsibilities and program updates (E3 & E5a), added project engineering and design team responsibilities (E2f), updated repeating auditor restrictions (E7a), added annual review of reporting feedback (E9e), updated to include climate-risk analysis (E12), updated meeting cadence (E13a).	Allie Valenti, Gretchen Hancock, Kathryn Hinckley, Deb Geyer
08	08/31/2019	CAP section updated to include legal entities (E7b)	Allie Valenti, Adeeta Badoo, Gretchen Hancock, Chiara Parapini, Kris Westhovens, Kathryn Hinckley, Deb Geyer
09	09/17/2021	Consolidated major sections and linked extended policies, removed light integration section regarding GEM	Jennifer Kriner, Allie Valenti, Deb Geyer, Kathryn Hinckley