StanleyBlack&Decker

MODERN SLAVERY STATEMENT (FY25)

This statement has been published in compliance with requirements under the *Modern Slavery Act 2015* (U.K.), the *Modern Slavery Act 2018* (Australia), and the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), and it summarizes steps taken by Stanley Black & Decker, Inc. (NYSE: SWK) and certain of its subsidiaries (collectively, "Stanley Black & Decker", "we", "us", "our") to seek to ensure that modern slavery and human trafficking do not occur within our operations, supply chains or other parts of our business.

This statement is made on behalf of the following subsidiaries of Stanley Black & Decker, Inc.: with respect to the *Modern Slavery Act 2015* (U.K.): Black & Decker, Black & Decker Europe, Stanley Black & Decker UK Limited, Stanley UK Services Limited, The Stanley Works Limited, and Avdel UK Limited. (the "U.K. reporting entities"); with respect to the *Modern Slavery Act 2018* (Australia): Stanley Black & Decker Australia Pty Ltd., and MTD Products Australia Pty Ltd. (the "Australian reporting entities"); and with respect to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada): Stanley Black & Decker Canada Holdings ULC, Stanley Black & Decker Canada Corp, Mac Tools Canada Inc., MTD Products Limited, 2315708 Ontario Inc., and Nelson Stud Welding Canada Inc. (the "Canadian reporting entities"). This statement covers the 2025 fiscal year of the U.K. reporting entities and Canadian reporting entities, from 1 January 2025 to 31 December 2025, as well as the 2024-2025 fiscal year of the Australian reporting entities from 1 July 2024 to 30 June 2025. All information in this statement is current only as of the date originally presented.

Introduction

Stanley Black & Decker is committed to eradicating modern slavery and human trafficking from its supply chain and respecting human rights in accordance with international standards and guidelines, such as the Guiding Principles for Business and Human Rights and the Universal Declaration of Human Rights. We strive to work ever more closely with our suppliers to ensure their workforce and the workforce of their supply chains are treated with respect and dignity. At the heart of our mission lies a commitment to fostering inclusive workplaces and sourcing products responsibly.

Organisational Structure and Activities

Stanley Black & Decker is a global provider of hand tools, power tools, outdoor products and related accessories, as well as a leading provider of engineered fastening solutions and services for various industrial applications. The ultimate parent of the Stanley Black & Decker group is Stanley Black & Decker, Inc., a public company traded on the New York Stock Exchange as "SWK".

As of January 3, 2026, Stanley Black & Decker had over 43,500 employees and 6,300 temporary contractors in 59 countries. Approximately 66% of Stanley Black & Decker's employees are paid by the hour, working principally in manufacturing and distribution centres, and the remaining 34% are salaried.

As of January 3, 2026, Stanley Black & Decker owned or leased facilities used for manufacturing, distribution and sales offices in 18 states and 21 countries. Approximately 66% of Stanley Black & Decker's 2025 revenues were generated in North America, with the remainder generated largely from Europe (16%), and emerging markets (18%).

Stanley Black & Decker's operations are classified into two business segments: Tools & Outdoor and Engineered Fastening.

The Tools & Outdoor segment is comprised of the Power Tools Group , Hand Tools, Accessories & Storage, and Outdoor Power Equipment product lines. The segment is a global leader in the tools and outdoor markets and carries iconic brands in the industry, including DEWALT®, CRAFTSMAN®, STANLEY®, BLACK+DECKER® and CUB CADET®. The segment sells its products to professional end users,

distributors, independent dealers, retail consumers and industrial customers in a wide variety of industries and geographies.

The Engineered Fastening segment is a global leader of highly engineered, application-based solutions such as fasteners and fittings and carries legacy brands like Nelson®, Tucker®, and POP®. The segment sells its products and services to clients in the automobile, industrial and aerospace[1] industries.

To learn more about Stanley Black & Decker, refer to the 2025 Annual Report, which can be found on the Stanley Black & Decker corporate website at: https://www.stanleyblackanddecker.com/investors.

Supply Chain

Stanley Black & Decker has an extensive network of suppliers of raw materials, component parts and finished goods around the world. A subset of the supply base will be considered "critical suppliers", based upon several factors including overall spend level, gross sales value tied to the material supplied, ease of switching supply (i.e., single- and sole sourced suppliers), business impact and strategic partnerships. Our products are manufactured using both ferrous and non-ferrous metals including steel, zinc, copper, brass, aluminum, and nickel. Additionally, we use other commodity-based materials for components and packaging including plastics, resins, wood and corrugated products, and purchase components such as batteries, motors, engines, transmissions, and electronic components to use in manufacturing and assembly operations along with resin-based moulded parts. Raw materials are procured globally from multiple sources.

Risk Profile

Within Our Business

Although Stanley Black & Decker operates in the manufacturing sector, we believe that the risks of modern slavery, human trafficking, forced labour or child labour occurring within our own business operations are low. Employee well-being is of utmost importance to Stanley Black & Decker. We take pride in maintaining a safe and healthy work environment, embracing sustainable practices, continually improving and learning from each other, recognising and rewarding those who exceed expectations, advancing human rights in the workplace and giving back to our communities.

In 2023, we embarked on a long-term vision to develop a global well-being strategy dedicated to supporting employee well-being. The implementation of the strategy varies by country, but it includes benefits to support the broad wellness of employees' healthy lifestyles, mental health, and retirement readiness, which is bolstered by programs to support a healthy, psychologically safe culture at work. Stanley Black & Decker also supports its employees and promotes work/life balance through benefits such as paid parental leave, paid time off, flexible work arrangements and virtual/hybrid working model policies.

Throughout Our Supply Chain

Stanley Black & Decker's dedicated Supplier Risk & Compliance Team manages the review of supplier risks associated with modern slavery and the assurance of decent working conditions, and requires suppliers to use auditors certified by the Association of Professional Social Compliance Auditors (APSCA) to conduct in-person audits. Stanley Black & Decker recognises that risks of modern slavery may be present in our supply chain. We have identified the following risk factors:

[1] On April 6, 2026, Stanley Black & Decker completed the sale of its Consolidated Aerospace Manufacturing ("CAM") business; this statement includes the now-divested CAM business.

- Geographical risk: Some of our manufacturing facilities and some of the suppliers we source from are located in countries that have an increased risk of modern slavery due to low governance standards, conflict or poverty.

- Industry risk: Manufacturing is recognised as a high-risk sector.

- Sector risk: We are aware of parts of our supply chain where subcontracted labour is used. As supply chains can be multi-tiered and multi-jurisdictional and complex, there can be a lack of transparency.

- Product risk: We source raw materials such as steel and aluminium which present a higher risk of modern slavery. We also source raw materials that potentially expose us to issues associated with conflict minerals. Moreover, certain low-margin products present a higher-risk of modern slavery.

Policies

Stanley Black & Decker implements and enforces global standards. These standards are published on its website at https://www.stanleyblackanddecker.com/impact/governance/resources-policies and include the following policies related to modern slavery, forced labour and child labour.

➢ *Code of Business Ethics*

Stanley Black & Decker's commitment to human rights is reflected in its Code of Business Ethics, which is posted on the Company's websites. As set forth in the Code:

> ***Doing right by our people is a part of our character, and we actively demonstrate the courage to care, respect and support the fundamental Human Rights of all individuals. As a global business, we are committed to respecting, protecting and supporting the principles included in the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and the Rights at Work.***

Stanley Black & Decker's Code of Business Ethics applies to employees, officers, directors, contractors, vendors and suppliers. All of our directors, executive officers and employees must know, understand and follow the Code and its tenets. Stanley Black & Decker's reputation, culture and values are important to its success; any violations of the Code, or the law, will result in disciplinary action, up to and including termination. The Code of Business Ethics can be found at: https://www.stanleyblackanddecker.com/impact/governance/code-business-ethics.

➢ *Global Human Rights Policy Statement*

Stanley Black & Decker has further adopted a global Human Rights Policy Statement, which sets forth the framework for embedding the respect of human rights into our workplace and labour practices. It also communicates our expectations for third parties with whom we do business:

> ***It is our policy to comply with all applicable laws, rules and available regulations concerning labor practice in all the countries in which we operate. In addition to our own employees, we expect all our partners, distributors, resellers, advisors, consultants, contractors, agents and other intermediaries representing us to adhere to the dictates contained in our Code of Business Ethics and in this Human Rights Policy Statement.***

➢ *Human Rights Due Diligence Framework*

Stanley Black & Decker has established a Human Rights Due Diligence Framework which utilises a web-based platform for performance monitoring and data storage of its individual sites. This includes specific Risk Assessments and Mitigations and is applicable to all sites globally. These describe the standards and

steps to ensure adequate human rights adherence at individual site level and so combine to form a global due diligence system.

We continue to review The Human Rights Due Diligence Framework to ensure that it remains up to date and captures evolving risks to human rights.

- *Supplier Code of Conduct*

We actively work with our suppliers to elevate our shared social and environmental performance, supporting their pursuit of continuous improvement and operational excellence, while expecting them to meet the highest standards of quality, ethics and sustainability as outlined in our Supplier Code of Conduct. The Supplier Code of Conduct outlines applicable legal obligations, industry standards, and sustainable procurement policies to support supplier operational practices and supply chains.

Stanley Black & Decker's Supplier Code of Conduct sets forth our commitment to engage in business relationships with partners who share our values. It expressly prohibits our suppliers from using forced labour, prison labour, child labour or any form of physical or mental punishment. It also requires suppliers to embrace and implement specific standards on equal opportunity hiring, freedom of association, fair wages, working hours, and workplace safety. The Supplier Code of Conduct is included in our Supplier Handbook, a copy of which is sent to our suppliers.

- *Supplier Handbook*

In addition to the Supplier Code of Conduct and various guidelines on new supplier selection and quality control processes, Stanley Black & Decker's Supplier Handbook also contains comprehensive guidelines on our audit procedure. Our Global Supply Management organization audits our suppliers to review their corporate social responsibility performance against the requirements of our Supplier Handbook, including use of child labour, compensation, working conditions, forced and prison labour, and basic worker/human rights. Their performance is graded on a traffic light basis so we can see where we need to focus any resource to help improve performance.

- *Sourcing raw materials*

Stanley Black & Decker is committed to conducting its business in an ethical, law abiding manner. Stanley Black & Decker is aware of the issues associated with the mining of conflict minerals (such as tin, tungsten, tantalum and gold) which is occurring in the Democratic Republic of Congo and adjoining countries and its obligation under the *Dodd-Frank Act* (United States).

Stanley Black & Decker works with its suppliers to educate them regarding the issues surrounding conflict minerals and steps that can be taken to increase transparency regarding the origin of minerals contained in the products supplied to us. Selected suppliers are required to complete a survey which helps identify any risks of conflict minerals. Suppliers are selected on the basis of location, contract spend, risk factors identified in the supply chain and to ensure compliance with section 1502 US Dodd Frank Act. In 2025 suppliers representing 70% of direct material spend coverage completed the survey and, in some cases, suppliers were required to provide additional information to Stanley Black & Decker. Stanley Black & Decker sends an annual conflict minerals survey to suppliers that met a prescribed spend threshold and verification is requested of the use of non-responsible mineral smelters by suppliers.

Stanley Black & Decker reserves the right to request additional information from suppliers regarding the origin of conflict minerals. If a supplier fails to cooperate, this could lead to termination of the business relationship with us. Stanley Black & Decker's Conflict Mineral Policy which can be found at: https://www.stanleyblackanddecker.com/sites/default/files/2025-05/sbd-conflict-minerals-policy.pdf

Due Diligence Processes

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we have adopted the following due diligence procedures.

- *Identification of Supplier Risk*

Stanley Black & Decker maintains processes and monitoring to identify any changes in markets, industries, and geopolitical conditions that may affect a country or sector's risk profile. To guide these assessments, Stanley Black & Decker has developed a risk matrix based on Maplecroft risk intelligence principles, which account for geopolitics, climate change, political instability, economic pressures and threats to human rights. This matrix determines which suppliers require heightened scrutiny, including in-person audits.

- *Supplier Compliance*

Stanley Black & Decker is actively engaged with suppliers to ensure they remain in full compliance with our Supplier Code of Conduct. As part of this effort, we screen new and existing suppliers using internal resources and independent auditing organizations such as Intertek, SGS, and TUV, among other accredited organizations. For example, we use targeted screening questions for our direct goods suppliers, covering forced and child labour, fire and hazardous materials, labour compensation, labour working hours, health and safety, suppliers and subcontractors, and discrimination practices. All completed questionnaires are scrutinized as part of the supplier acceptance process, and any inconsistencies or answers that flag concern are followed up by a member of the Supplier Risk & Compliance Team.

Where concerns are identified through any due diligence process, we work with the supplier to assess impact and determine appropriate next steps. Depending on the facts specific to the supplier's conduct, we may stop orders as we investigate and may ultimately terminate the relationship as appropriate.

<u>Supplier Social Accountability Program</u>

Stanley Black & Decker's Supplier Social Accountability Program establishes the audit standards against which all suppliers are evaluated. The program prioritizes suppliers for self-assessments and in-person assessments based on risk. The Program has also increased awareness of compliance gaps and requirements amongst Stanley Black & Decker's employees and external stakeholders.

We have also leveraged third-party standards, including the SA8000 certification, in certain facilities to guide our program development. SA8000 certification is the principal social certification standard, which incorporates several tenets of the United Nations Universal Declaration of Human Rights and International Labor Organization (ILO) convention.

<u>Audits</u>

During the reporting period, Stanley Black & Decker and its consultants conducted in-person audits of its suppliers covering over 80% of direct material spend in high-risk countries. These audits categorize identified issues as high, medium, or low risk, with each categorization further reviewed against the supplier's location and industry to ensure country- and sector-specific risks are reflected in the risk profile. Depending on the nature and severity of the issue, SBD will determine the frequency and scope of any further audits.

Audit methodologies are reviewed regularly, taking into account previous findings, locations, trends, legislative developments, and guidance from authorities and regulators. Certain audits are unannounced whilst other audits are announced to the suppliers with only the minimum lead time necessary to ensure that all required documentation is available to the auditing team.

New suppliers are audited by Stanley Black & Decker's Supplier Quality Team, which performs the Social Accountability Audit and takes any additional steps necessary to ensure that the new supplier meets Stanley Black & Decker standards.

Existing suppliers are monitored through a combination of regular and ad hoc self-assessments. Self-assessments require suppliers to acknowledge and comply with our Supplier Code of Conduct. Failure to undertake a self-assessment may result in suspension or termination of the supplier relationship.

For suppliers in countries identified as higher risk, third-party consultants are retained to perform periodic on-site audits, and those suppliers are required to allow such audits. The audits are conducted by APSCA certified auditors. The Supplier Quality Team also performs Social Accountability Audits for those suppliers identified as being higher risk.

All results of audits are carefully reviewed by Stanley Black & Decker's Supplier Risk Team. Re-auditing is cadenced based on prior results, and Stanley Black & Decker continues to monitor both supplier and country conditions to ensure that high-risk markets and suppliers are promptly identified.

- *Integrity Helpline*

Stanley Black & Decker requires employees at all levels to promptly report concerns about potential violations of law or company policies. Reporting channels include managers, HR, Legal Regional Ethics & Compliance leaders and the Integrity Helpline. The Integrity Helpline is confidential and available 24/7 for employees and third parties to raise any concern, including forced labour, child labour or any conduct that does not align with our values or that may be against the law or company policy. Stanley Black & Decker strictly prohibits retaliation against anyone who reports a concern in good faith or participates in an integrity investigation.

Our strategic communication approach has increased awareness of the Integrity Helpline and has educated employees that this resource is available for all types of concerns. Communication elements include posters, digital boards and Helpline FAQ—all available in 31 languages—and a QR Code for easy access to the Helpline.

- *Integrity Insights*

A key communication channel for our global employee audience is Workplace, which includes a dedicated "Integrity @ SBD" channel. This features Integrity Insights, which uses real and hypothetical examples of employee actions—both when something goes right and when there are missteps—to talk in an authentic way about integrity and what it means to do the right thing. Many examples come directly from our Integrity Helpline.

Training

- *Employee Training*

Stanley Black & Decker offers e-learning on the Code of Business Ethics for global employees in appropriate languages. All new hires meeting our salaried/online criteria, including employees of newly acquired businesses, are expected to complete this course within 60 days of hire. This course contains a modern slavery awareness component.

All salaried employees are required to complete annually training to aid their understanding of Stanley Black & Decker's Code of Business Ethics. Stanley Black & Decker keeps records for both internal and external training sessions. Internal training sessions are done in-person, via Zoom calls, webinars and/or through one of its e-learning courses hosted in learning management systems. External training is done through various delivery mechanisms.

- *Supplier Training and Helpline*

Stanley Black & Decker is reviewing its training program with a view to creating virtual/on-demand online training modules which can be accessed by its suppliers.

Stanley Black & Decker has an ethics and compliance "Helpline" which provides assistance to all of its suppliers, employees and consultants in managing supply chain risks. This could include, for example, a supplier querying what steps need to be taken in its supply chain to ensure compliance, or querying whether particular conduct falls foul of Stanley Black & Decker's requirements in relation to modern slavery.

Remediation Measures

We diligently monitor our supply chain partners for alignment with our values and compliance with our company policies. As detailed in this statement, assessments and audits of suppliers are conducted globally to verify compliance with Stanley Black & Decker's practices and global standards. Any issues that are identified are corrected using a corrective action plan highlighting the issue, corrective action, responsible party for implementation and timing. Where exploitative practices, including modern slavery, forced labour or child labour, are alleged, we are equipped to take action and promptly implement all appropriate remediation measures. We are committed to making every effort to ensure that remediation measures, to the extent required, do not result in loss of income for vulnerable families.

Assessing Effectiveness

Stanley Black & Decker assesses the effectiveness of its modern slavery risk management measures through Category Manager business reviews and regular Supplier Risk Team meetings, which are used to monitor any newly identified risks or changes in supplier, country, or industry risk profiles. Regular meetings are also held with Category Managers to track and monitor the completion of supplier self-assessments and the scheduling of follow-ups or in-person audits, where applicable.

Supplier compliance with Stanley Black & Decker's practices and global standards is assessed through supplier audits. Audit findings are used to measure the effectiveness of controls, with identified deficiencies addressed through graduated penalties, ranging from requirements for corrective action plans and follow up audits to termination of the business relationship.

Consultation and Approval

This statement was developed in consultation with the U.K. reporting entities, the Australian reporting entities and the Canadian reporting entities. A draft was circulated among all such entities prior to finalizing and each had the opportunity to provide comments.

This statement was approved by the boards of directors of each of the U.K. companies listed below:

- **Tools and Outdoor:** Black & Decker, Black & Decker Europe, Stanley Black & Decker UK Limited, Stanley UK Services Limited, and The Stanley Works Limited.

DocuSigned by:

By: _____
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Mark Smiley
Director
Date: 28/05/2026

- **Engineered Fastenings:** Avdel UK Ltd.

DocuSigned by:

By: _____
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Christopher Magson
Director
Date: 28/05/2026

This statement was approved by the boards of directors of Stanley Black & Decker Australia Pty Ltd. and MTD Products Australia Pty Ltd., the reporting entities under the *Modern Slavery Act 2018*.

STANLEY BLACK & DECKER AUSTRALIA PTY LTD.

DocuSigned by:
Adrian Davis
By: 71F6306597D6450...
Adrian Davis
Director
Date: **May 27, 2026**

MTD PRODUCTS AUSTRALIA PTY LTD.

DocuSigned by:
Adrian Davis
By: 71F6306597D6450...
Adrian Davis
Director
Date: **May 27, 2026**

This statement was approved on the dates written below by the boards of directors of Stanley Black & Decker Canada Holdings ULC, Stanley Black & Decker Canada Corp, Mac Tools Canada Inc., MTD Products Limited, 2315708 Ontario Inc., and Nelson Stud Welding Canada Inc. (each pursuant to subparagraph 11(4)(b)(i) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*).

STANLEY BLACK & DECKER CANADA HOLDINGS ULC

By:_____
Donald J. Riccitelli
Director
Date: **May 27, 2026**

I have the authority to bind Stanley Black & Decker Canada Holdings ULC

NELSON STUD WELDING CANADA INC.

By:_____
Donald J. Riccitelli
Director
Date: **May 27, 2026**

I have the authority to bind Nelson Stud Welding Canada Inc.

MTD PRODUCTS LIMITED

By:_____
Jennifer LeDonne
Director
Date: **May 27, 2026**

I have the authority to bind MTD Products Limited

2315708 ONTARIO INC.

By:_____
Jennifer LeDonne
Director
Date: **May 27, 2026**

I have the authority to bind 2315708 Ontario Inc.

STANLEY BLACK & DECKER CANADA CORP

By:_____
Donald J. Riccitelli
Director
Date: **May 27, 2026**

I have the authority to bind Stanley Black & Decker Canada Corp

MAC TOOLS CANADA INC.

By:_____
Jennifer LeDonne
Director
Date: **May 27, 2026**

I have the authority to bind Mac Tools Canada Inc.