HUMAN RIGHTS DUE DILLIGENCE FRAMEWORK

Due Diligence Overview

Stanley Black and Decker utilises a unique internal web-based platform (EHS Web) for performance monitoring and data storage of our individual site’s progress on the EHS and CSR Aspects. This includes specific Human Rights Road Maps, Risks Assessments and Mitigations, and is applicable to all sites globally. Every facility within Stanley Black and Decker follows a five stage Road Map process to achieve compliance and continuous improvement. These Road Maps 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 ask our operations to follow up, reporting on the assessment as depicted on page 4, to identify Human Rights Concerns and appropriate mitigations including elevation to Corporate.
DMAIC Process

**Level 1 (DMAIC): Define**
- A formal written process to obtain the Human Rights Road Map completion
- The facility provides a standard operating procedure and uploads it to the platform.
- The Road Map score is verified, respective to provided evidence, by regional/business manager.

**Level 2 (DMAIC): Measure**
- Complete Human Rights Risk Assessments for each Human Rights Road Map
- The facility completes a SBD Human Rights Risk assessment and uploads it to the platform.
- The Road Map score is verified, respective to provided evidence, by regional/business manager.

**Level 3 (DMAIC): Analyse**
- Analyse / conclude the assessment, decides on follow up actions and mitigation plan as necessary.
- The facility uploads compliances, comments, actions and mitigation to the platform.
- The Road Map score is verified, respective to provided evidence, by regional/business manager.

**Level 4 (DMAIC): Improve**
- Expand on corrective actions and procedural improvements, including training, are assigned the highest priority, to named individuals and tracked to completion.
- The Road Map score is verified, respective to provided evidence, by regional/business manager.

**Level 5 (DMAIC): Control**
- Dedicated Human Rights Champion annually reviews the Discrimination and vulnerable Groups program.
- The Road Map score is verified, respective to provided evidence, by regional/business manager.
Risk Assessment Process

Complete Risk Assessment at local operation
(exeected by nominated Human Rights Champion)

Assess Compliance
Discrimination & Vulnerable Groups and Human Rights Risk Situation assessment

Non-conformity
(achievable)

Develop mitigation Plan
Implement accordingly
Amend Risk Assessment to reflect change
Re-assessment

Non-conformity
(unachievable)

Report on Human Rights Concern Tracker tool on EHS Web
Provide evidence

Complete compliance

No further action required
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<thead>
<tr>
<th>Revision Number</th>
<th>Date</th>
<th>Description of Change</th>
<th>Name</th>
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<tbody>
<tr>
<td>00</td>
<td>4/30/2018</td>
<td>Initial Release</td>
<td>Nick Keightley, Theresia Trommer</td>
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<tr>
<td>01</td>
<td>5/14/2019</td>
<td>Formatting Updates</td>
<td>Allie Valenti</td>
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<tr>
<td>02</td>
<td>3/6/2020</td>
<td>Annual Review</td>
<td>Theresia Trommer</td>
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