HUMAN RIGHTS DUE DILIGENCE 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. As detailed in RM1 and RM 2 below, the Human Rights Road Maps are setting the requirements for our sites due diligence to assess for potential human rights risks for our own employees, third party labor workers, women, children, indigenous people, migrant works, local community and other. The due diligence additionally includes assessments against forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, equal remuneration, discrimination, etc. The Road Maps requirements are implemented by every facility within Stanley Black and Decker following a five stage DMAIC process (pg.4) 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.

(EHS Web) Internal Platform "Road Maps" for each facility / operation globally

Human Rights Road Maps - SBD standards for Human Rights (DMAIC process)

Global SBD Human Rights Due Diligence

Each operation globally follows the DMAIC Road Map process (see page 3), a global governance tool, making SBD globally due diligent in Human Rights.

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 SID 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 conclusions, 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 (executed 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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<td>4/30/2018</td>
<td>Initial Release</td>
<td>Nick Keightley, Theresia Trommer</td>
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<td>Formatting Updates</td>
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