

**U.K. MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT FOR THE YEAR ENDED 31 DECEMBER  
2018**

This statement has been published in compliance with requirements under the Modern Slavery Act 2015 and it summarises steps taken by the U.K. subsidiaries of Stanley Black & Decker, Inc. (NYSE: SWK) to ensure that modern slavery and human trafficking in any form is not taking place in our commercial organisation, supply chains or in any part of our business.

**Introduction**

Stanley Black & Decker is actively committed to eradicating human trafficking and slavery from its supply chain. The Company does not and will not permit its employees, subcontractors, subcontractor employees or agents to engage in any form of trafficking in persons, and will take appropriate action, up to and including termination, against employees, agents or subcontractors that violate this policy. Employees, subcontractors and agents who become aware of a potential violation of this policy are expected to report the potential violation to the Company's Senior Vice President for Human Resources.

**Organisational structure and activities**

Stanley Black & Decker is a diversified global provider of hand tools, power tools and related accessories, mechanical access solutions (i.e. automatic doors and commercial locking systems), electronic security and monitoring systems, healthcare solutions, engineered fastening systems and products and services for various industrial applications, as described in more detail in the 2018 Annual Report, which can be found on the Stanley Black & Decker corporate website at:

<http://www.stanleyblackanddecker.com/investors>.

The U.K. Companies provide these products and services within the U.K.

**Supply chain and activities**

Stanley Black & Decker has an extensive network of suppliers of raw materials, component parts and finished goods around the world and is actively committed to eradicating human trafficking and slavery from its supply chain.

Supplier compliance is ensured by annual supplier self-assessments, followed by on-site audits and requalification audits. These audits are conducted personally by Stanley Black & Decker auditing teams and include confidential employee interviews of individuals selected by Stanley Black & Decker. The audits are announced to the suppliers only with as much lead time as minimally necessary to ensure that all required documentation is available to the auditing team. These on-site audits include verification of time and pay records. Suppliers are rated for compliance with Stanley Black & Decker practices and standards. Deficiencies found during supplier audits can result in graduated penalties, ranging from requirements for corrective action plans and follow up audits to termination of the business relationship.

## **Due Diligence**

The U.K. Companies have determined that their main exposure to modern slavery may be identified within their supply chains and have measured this risk over several years through proactive steps whereby new third party vendors, suppliers and business partners are subject to due diligence checks founded upon compliance audits and ethical policies of how Stanley Black & Decker conducts business as a global organisation. Such audits are carried out globally.

## **Policies**

Stanley Black & Decker's commitment to human rights is reflected in its Business Conduct Guidelines, which are posted on the Company websites and are distributed annually to all of the Company employees worldwide. As set forth in the Guidelines:

The Company is strongly committed to full compliance with human rights and labour standards. The Company facilities and the facilities of the Company's direct and indirect vendors must ensure that no Company product is made in whole or in part using any child, forced or prison labour. The Company, its subcontractors and agents and their respective employees are expected to comply with the Company's Combating Trafficking in Persons Policy. The Company's managers and the Company's direct and indirect vendors have the obligation to provide for factory inspections, to be vigilant, and to take immediate action to prevent any unfair employment practices.

## **Training**

The U.K. Companies ensures all senior management are annually trained to aid their understanding with Stanley's Business Conduct Guidelines which determine how we conduct our business. The UK subsidiaries implement ethical policies founded upon standards for sustainability and social accountability to protect the business.

## Approval

This statement has been approved by the board of directors for each of the companies listed below:

### TOOLS & STORAGE

Black & Decker  
Black & Decker Europe  
Stanley Black & Decker UK Ltd  
Stanley UK Services Ltd  
The Stanley Works Ltd



**Mark Smiley**  
Director

### SECURITY

Stanley Security Solutions Ltd  
Christie Intruder Alarms Ltd  
Contract Fire Systems Ltd  
Southern Monitoring Services Ltd  
Stanley Security Solutions (NI) Ltd



**Stephen Lord**  
Director

### OIL & GAS

CRC-Evans Offshore Ltd  
Pipeline Induction Heat Ltd  
PIH Services Ltd  
Universal Inspection Systems Ltd



**Adam Wynne Hughes**  
Director

### STANLEY ENGINEERED FASTENINGS

Avdel UK Ltd



**Amit Sood**  
Director