



Policy Against Human Trafficking and Slavery

Guided by the beliefs and values in our “Who We Are” statement, Snap-on is committed to integrity and social responsibility. Paramount to this commitment is the manner in which we treat our employees and the way in which others within our supply chain treat their employees. This Policy outlines the efforts Snap-on makes to seek to eliminate human trafficking, slavery, forced labor and child labor (collectively, **Modern Slavery**) from its operations and global supply chain. This Policy is designed to comply with, and support compliance with, the California Transparency in Supply Chains Act, the UK Modern Slavery Act, the Australian *Modern Slavery Act 2018* (Commonwealth of Australia), the Australian *Modern Slavery Act 2018* (New South Wales, Australia), the Norway Transparency Act (effective as of July 1, 2022), and the requirements of Federal Acquisition Regulations 52.222-50 and 52.222-56 (together, the **Modern Slavery Laws**).

This Policy applies to all Snap-on businesses, directors, employees, agents, subcontractors, and suppliers worldwide when acting within their scope of employment or contract with Snap-on. This Policy applies in addition to a number of workplace policies that are currently in place and apply to Snap-on employees, including the Code of Business Conduct and Ethics and the Human Rights Policy.

Snap-on will not tolerate and will not condone the use of slavery, forced, involuntary or coerced labor, child labor, human trafficking or sex trafficking by any employee, agent, subcontractor or supplier in the operation or support of our business or the manufacture and distribution of our products. To that end, Snap-on strives to identify any high-risk areas within its operations and supply chains. As part of that process, Snap-on requires that its businesses, directors, employees, agents, subcontractors, and suppliers:

1. Comply with the Modern Slavery Laws and take all steps reasonable within their respective scope of duties and responsibilities to ensure Snap-on’s compliance with the Modern Slavery Laws;
2. Not engage in any form of human trafficking, whether by force, fraud, or coercion; or any form of involuntary servitude or slavery; or any form of sex trafficking or the procurement of any commercial sex act;
3. Not knowingly use any form of forced or involuntary labor, including through the use of (a) threats of serious harm to, or physical restraint against, a person or another person; (b) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not perform such labor or services, that the person or another person would suffer serious harm or physical restraint; or (c) any abuse or threatened abuse of law or the legal process;
4. Not engage in, or support the use of child labor and shall comply with all applicable local child labor laws;
5. Not destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses;
6. Not use misleading or fraudulent practices during the recruitment of employees or offering of employment, and shall endeavor to the extent possible to disclose to employees, in a format and language accessible to the employee, the basic information regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided or arranged by Snap-on or its agents), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work. If required by law or contract, provide an employment contract, recruitment agreement, or other required work document in writing, which shall be in a language the employee understands;
7. Comply with all applicable local wages, benefit, and working hours labor laws;

8. Not charge employees recruitment fees and shall not use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
9. Provide return transportation or pay for the cost of return transportation upon the end of employment for employees who are not nationals of the country where they are working if the employee is brought to that country for purposes of working on a U.S. government contract;
10. If Snap-on or a Snap-on supplier provides or arranges housing for employees, the housing shall meet the host country housing and safety standards.

Snap-on shall periodically review and evaluate its internal operations and its supply chain to identify and assess the potential risks of Modern Slavery or any activity that could violate this Policy and will take action, as necessary.

As part of its mandated annual employee training, Snap-on includes training on human trafficking and slavery to employees responsible for managing other employees as well as those employees responsible for its global supply chain. In addition, Snap-on will provide additional training to members of its global supply chain team, who are tasked with communicating this Policy to our global suppliers. Snap-on will periodically assess internal awareness of, and compliance with, this Policy as well as awareness of, and compliance with, this Policy within our supply chain.

Snap-on suppliers and subcontractors who supply any product or service that (i) is related to or supports our business operations or (ii) is incorporated into the products or services we sell are required to review this Policy and comply with it and with the Snap-on Supplier Code of Conduct. Such suppliers will be required to periodically certify that they (a) have read and understand this Policy and the Supplier Code of Conduct and (b) comply with the expectations in the Supplier Code of Conduct, the Modern Slavery Laws and any other relevant laws regarding human trafficking, slavery and labor standards of the country or countries in which they are doing business.

Any Snap-on employee that is informed of or witnesses a violation of this Policy, or is uncertain about the proper course of action relating to the matters addressed in this Policy, is encouraged to immediately contact his or her supervisor. If the issue is not resolved or the employee is not comfortable raising the issue with his or her supervisor, the employee should use other reporting channels appropriate for the employee's business unit. Employees in the United States and Canada may contact the Company's Ethics Help Line at 866-GO-TOOLS (866-468-6657). Employees outside the European Union, United States and Canada may access the Company's Ethics Help Line at the international toll-free service country codes listed at <https://my.snapon.com/EthicsHelpline.nws>. In addition, all non-EU based employees can submit the issue to the website <http://workplacealertprogram.alertline.com>.

Any questions about this Policy may also be addressed to the Legal Department or the Human Resources Department. In addition, employees may contact the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

Snap-on has a zero tolerance approach regarding any of its employees, agents, subcontractors or suppliers who engage in or support the use of slavery, forced, involuntary or coerced labor, child labor, human trafficking or sex trafficking. Failure to comply with this Policy will result in disciplinary action up to and including termination of employment. If a subcontractor or supplier is found in violation of this Policy, Snap-on will take prompt, remedial measures to address the violation, up to and including termination of the supplier or subcontractor. Referral action to proper authorities may be taken in cases involving breaches of certain criminal laws.

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