

Anti-Trafficking Compliance Plan

Purpose

In accordance with FAR 52.222-50(h), Snap-on Incorporated (“Snap-on”) has developed this Anti-Trafficking Compliance Plan (the “Plan”) with respect to Snap-on’s U.S. Government contracts and Snap-on’s contracts with US Government contractors that involve the supply of products or services by Snap-on, other than commercially available off-the-shelf items, acquired outside the U.S., or services to be performed outside the U.S., and that exceed \$500,000 in value. The purpose of this Plan is to ensure that Snap-on’s employees, agents, suppliers and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations. The Plan also includes terms for recruitment, wages, and housing, as well as procedures to prevent employees, agents, suppliers and subcontractors from trafficking in persons.

Tailoring of Plan

This Plan (or its implementation with respect to a specific contract) may be sufficiently tailored or altered to reasonably address the size and complexity of a particular contract; and to take into account the nature and scope of the activities to be performed for the US Government or a US Government contractor, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

Policy and Code of Conduct

Since 1920, Snap-on has focused on serving customers, associates, investors, franchisees, suppliers and the communities where it does business. Guided by the core beliefs and values as laid out in Snap-on’s “Who We Are” statement, Snap-on’s commitments to integrity and social responsibility extend to its worldwide supply base, including Snap-on’s responsibility to maintain and improve its systems and processes to help eliminate any human rights violations in its operations, its supply chain and its products. These and other issues are addressed in Snap-on’s Code of Business Conduct and Ethics, which can be found at <https://www1.snapon.com/corporate/codeofconduct.nws>.

Snap-on has also adopted a Policy Against Human Trafficking and Slavery (the “Anti-Trafficking Policy). In addition, Snap-on requires its suppliers, regardless of location, to conduct business consistent with Snap-on standards, and Snap-on requires that suppliers must adhere to Snap-on’s Supplier Code of Business Conduct (the “Supplier Code”). The Supplier Code establishes standards to ensure that working conditions in Snap-on’s supply chain are safe, that workers are treated with respect and dignity, that no supplier will engage in human trafficking, slavery, forced labor or child labor, and that business operations are environmentally responsible. The complete Supplier Code can be found at:

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<http://www1.snapon.com/display/conduct.nws> Collectively, these codes and policies make clear that Snap-on is committed to eliminate human trafficking, slavery, forced labor and child labor from its global supply chain.

Employee's Rights Under This Plan

In the event that any Snap-on employee is relocated in connection with a US government contract to which this Plan applies, Snap-on will provide to such employee, at least five days prior to any relocation, an overseas assignment letter, written in a language understandable by the employee, that will include, but is not limited to, the following information: wages and fringe benefits; location of work; living conditions; housing and associated costs, if provided or arranged; any significant costs to be charged the employee; and hazardous nature of the work, if applicable.

Employees have the right to ask for clarification of any employment terms they do not understand.

As part of this Plan, the following applies to any Snap-on employee outside the US in connection with a US government contract to which this Plan applies:

Recruitment: Snap-on permits only the use of recruitment companies with trained employees and requires recruiters to comply with local labor laws and to provide potential employees and agents with accurate information pertaining to their employment, includes their duties, hours of work, location of work, wages, housing/living conditions, costs to be charged the employee, and any hazardous nature of the work, at least five days prior to any relocation. Snap-on prohibits charging employees recruitment fees.

Wages: Snap-on requires wages to meet applicable host-country legal requirements or explain any variance.

Housing: If housing is provided by Snap-on, it must meet host-country housing and safety standards.

Identity Documents: Snap-on strictly prohibits destroying, concealing, confiscating or otherwise denying access to employee identity or immigration documents.

Transportation Costs: Snap-on must provide return transportation at the end of employment for employees brought to a non-U.S. country for the purpose of working on a U.S. government contract.

For trafficking victims or witnesses seeking redress in the country of employment, Snap-on must provide transportation costs in a manner that does not obstruct such redress or witness activity. Non U.S. nationals brought to the U.S. may also qualify for return transportation costs. An employee may refuse return transportation costs

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if legally able to stay in the country. Snap-on may opt to either provide or pay for transportation, based on Snap-on's established policies and procedures, as well as the modes and costs of transportation available. Employees who are terminated for cause or who desire to leave prior to completion of the contract are still entitled to these costs, if they would otherwise qualify for them.

Reporting: Snap-on provides retaliation-free means of reporting suspected trafficking activity set forth in this Plan below. Such reporting is a critical tool to assist Snap-on in monitoring and detecting any trafficking violations. As required by applicable regulation, Snap-on will immediately notify appropriate Government officials of any credible information regarding suspected trafficking activity. Such reporting by Snap-on will be coordinated through the Snap-on's Legal Department.

Violations

Violations of Snap-on's Policy Against Human Trafficking and Slavery, Snap-on's Supplier Code of Business Conduct or this Plan by any Snap-on employee (or agent or supplier) may result in disciplinary action up to, and including, removal from the contract, suspension or debarment of the employee or agent from further Government contracting, and suspension or termination of employment (or termination of the agreement with the agent or supplier). Violations may also result in serious ramifications to Snap-on, including contract termination, suspension of contract payments, loss of Snap-on's fee or payments under the contract, or suspension or debarment.

Reporting Violations Under This Plan

Snap-on is committed to providing a safe and easy means of reporting suspected trafficking activity.

Any Snap-on employee that is informed of or witnesses a violation of this Plan, or is uncertain about the proper course of action relating to the matters addressed in this Plan, 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 your 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>).

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- All non-EU based employees can submit the issue to the website <http://workplacealertprogram.alertline.com>.
- Employees may contact the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

Any questions about this Plan may also be addressed to the Legal Department or the Human Resources Department.

Snap-on has an obligation to protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and shall not prevent or hinder the ability of these employees from cooperating fully with Government authorities.

If Snap-on is made aware of any credible information from any source pertaining to a suspected trafficking violation, Snap-on will investigate such allegations, take appropriate remedial measures, and, as required, notify the contracting officer and the appropriate agency Inspector General (IG) of that information, as well as what action it has taken with respect to the allegation.

Snap-on will fully cooperate with any Federal agency conducting an audit or investigation of potential anti-trafficking violations, including providing timely responses to Government investigators and providing reasonable access to facilities and staff.

Supplier Compliance, Monitoring and Verification

Snap-on's suppliers must comply, where applicable, with the anti-trafficking requirements detailed in Federal Acquisition Regulations (FAR) and the Defense Federal Acquisition Regulation Supplement ("DFARS"). Failure to comply with the requirements of these regulations or any other anti-trafficking law or regulation will result in swift action by Snap-on, up to and including immediate termination of any subcontract or agreement with Snap-on.

Snap-on suppliers and subcontractors who supply any product or service that is incorporated into the products or services Snap-on sells are required to review and comply with both the Anti-Trafficking Policy and the Supplier Code. Such suppliers will be required to periodically certify that they (a) have read and understand the Anti-Trafficking Policy and the Supplier Code and (b) agree to comply with the expectations in the Supplier Code and all relevant laws regarding human trafficking, slavery and labor standards of the country or countries in which the supplier does business.

Snap-on will monitor suppliers based on Snap-on's assessment of the risk presented by the supplier that will take into consideration the country in which the supplier

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operates and the particular product or service being provided. Where Snap-on has access and it determines is appropriate, Snap-on will review, the supplier's behavior for signs of trafficking in persons or violations of the Supplier Code.

If a Snap-on supplier is made aware of any credible information from any source pertaining to a suspected trafficking violation, that supplier is expected to investigate the allegations, take appropriate remedial measures, and notify Snap-on of that information, as well as what action it has taken with respect to the allegation.

Posting Of Compliance Plan

This Plan shall be posted in the workplaces where work on a US government contract or contract for a US government contractors is performed, unless it is impractical to physically post, in which case a written copy of such Plan shall be communicated to each affected employee.

Snap-on shall also post this Compliance Plan on its internal website, as well as the external website of its governing contracting subsidiary, <https://www1.snapon.com/industrial>

Certification Of Compliance Plan

When required by FAR 52.222-50(h)(5) or FAR 52.222-56, Snap-on will certify to the US Government that (a) it will maintain this Plan; (b) it will monitor, detect and terminate any supplier or subcontractor engaged in activities prohibited by the Anti-Trafficking FARs; and (c) after conducting sufficient due diligence, to the best of its knowledge and belief, neither Snap-on nor any of its subcontractors or agents are engaged in activities prohibited by the Anti-Trafficking FARs, or if aware of violation of the Anti-Trafficking Policy, Snap-on or its supplier or subcontractor has taken the appropriate remedial actions to address those violations.

Training/Awareness

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 the Anti-Trafficking Policy and Supplier Code to our global suppliers. Snap-on will periodically assess internal awareness of, and compliance with, this Plan, the Anti-Trafficking Policy as well as awareness of, and compliance with, this Plan and the Supplier Code within our supply chain.