

Snap-on Incorporated **Human Rights Policy**

At Snap-on, doing the right thing comes down to two simple words: Integrity. Principles. These words define who we are and how we act as a global family of businesses.

The words are simple, but upholding them takes hard work. It takes commitment to our values as individuals and as a corporation. It takes a desire to act with integrity and to perform to the highest ethical standards in everything we do. And it all starts with people.

Respect for human rights is a fundamental value at Snap-on. Outlined in our Mission Statement we explicitly state:

We demonstrate Integrity.
We tell the Truth.
We respect the Individual.
We promote Teamwork.
We Listen.

We embrace the approach to human rights set forth in the United Nations Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights for our employees, franchisees, contractors, and agents around the world. We require annual training on various human rights matters company-wide, including, but not limited to, the topics discussed in this Human Rights Policy (this “Policy”).

This Policy applies to Snap-on, the entities that we own, the entities in which we hold a majority interest and the facilities that we manage. We also expect our suppliers to uphold these principles and urge them to adopt similar policies within their own businesses.

As part of our efforts to ensure compliance with our beliefs, Snap-on also requires its suppliers, regardless of location, to conduct business consistent with our standards and to adhere to our Supplier Code of Business Conduct. The Supplier Code of Business Conduct 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.

Should we identify adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, the fair and equitable remediation of such issues.

This Policy is overseen by the Snap-on Incorporated Board of Directors, by the Chief Executive Officer and by the Company’s senior management.

Creating a Harassment-Free Workplace

At Snap-on we believe that every associate has the basic human right of being treated with respect, regardless of their job title, gender, age, race, physical condition, religion, disability, veteran status, or sexual orientation. We have zero tolerance for conduct that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. We encourage our associates to notify their management or human resource representative or to utilize our Ethics Help Line to report any type of harassment, without consequence or retaliation for reporting such behavior.

Equal Opportunities

Snap-on is committed to providing equal opportunities across all of our stakeholders and the Company does not tolerate discrimination. We strive to enlist individuals from a variety of backgrounds and to include them in an environment where everyone feels like an important part of the team. We embrace and value the advantages resulting from fresh points of view, innovative solutions, creative problem-solving methods, increased productivity, and other business benefits that an open and inclusive workplace brings. We also utilize internships, mentorships, and other recruitment activities to reach a broad pool of candidates. To further our support of makers and fixers, both within and outside our Company, Snap-on partners with national nonprofit organizations and community colleges to leverage career and technical education to expand the opportunities in our facilities, as well as in the critical industries we serve and beyond, for people from all walks of life.

In addition to promoting respect for all members of our workforce, on an annual basis, associates complete training on how we expect them to treat others in the workplace, as well as on our anti-discrimination policies.

Slavery, Child Labor, and Human Trafficking

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. Snap-on associates are taught to consider ways to identify, prevent and stop modern slavery in the workplace and supply chain. Modern slavery and human trafficking include enslaving people through force, abduction, fraud, coercion, and exploitation. We have a policy that explicitly prohibits any interaction with companies that engage in slavery or human trafficking. We also will not employ child labor or work with suppliers that employ child labor, consistent with the principles relevant to U.S. and international laws.

Health and Safety

Snap-on remains committed to non-negotiable product and workplace safety. The safety and health of our associates are a central focus for Snap-on. As a permanent and priority agenda item at all operational meetings, safety comes first in our company. Our products are engineered for safe operation, we initiate and maintain a safe workplace, and we diligently comply with our safety programs.

We invest in our safety culture and in elevating the importance of worker and product safety throughout all levels of the organization:

- Global safety results are communicated monthly. These communications highlight safety data and best practices, as well as incidents and lessons learned. This information is reinforced at monthly Safety Managers meetings.
- Every quarter, Management conducts a review of operations, including safety and other risk factors. Safety is also included as a topic in Management monthly updates.
- Annually, the Board is presented with a progress report on safety. In addition, Snap-on's Safety Directors for Europe and Asia tour U.S. plants and review safety programs, policies, procedures, and processes.

Every Snap-on associate is held accountable for ensuring safe behaviors and safe operations. Through these efforts and a concerted focus on developing a strong safety culture, we believe that we can continue to see improvement in Snap-on's recordable incident rate.

Workplace Security and Security Arrangements

Snap-on is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

To the extent that private or public security providers are needed, we strive to educate such providers regarding our commitment to respecting human rights and the principles in this Policy.

Community and Stakeholder Engagement

Snap-on recognizes that we are part of the communities in which we operate. Where appropriate, we engage on human rights matters that are important to these communities. Our goal is to ensure that we are listening to, learning from and considering the views of the people within our communities and that we conduct ourselves as good neighbors. We believe that local issues are most appropriately addressed at the local level.

Freedom of Association and Collective Bargaining

We respect employees' right to join, form, or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

Our experience has shown that open communication and a forum that allows employees to bring concerns, suggestions, and ideas forward produces improved methods, safety, products, operations, and efficiencies, which promote continued growth and prosperity for all stakeholders, especially employees.

Work Hours, Wages, and Benefits

Snap-on is committed to providing a fair or living wage for all of its associates worldwide. We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wages, work hours, overtime, and benefits laws and regulations.

Snap-on provides many valuable programs that benefit associates throughout their careers with Snap-on and in retirement. We encourage associates to make healthy lifestyle choices and offer a full array of health, welfare and other benefit programs, depending on location.

Water Resources

Snap-on respects the human need for sustainable water supplies, safe drinking water and protection of both ecosystems and communities through proper sanitation.

Rights of Indigenous Peoples

Snap-on respects the rights of indigenous peoples. We recognize that it is important that we identify and consult with indigenous peoples in situations where they may be affected by our business activities and seek to apply the principles of free, prior and informed consent where practical, ideally prior to the commencement of activities.

Guidance and Reporting for Employees

Snap-on strives to create workplaces in which open and honest communications among all employees are valued and respected. We are committed to complying with applicable labor and employment laws wherever we operate. We expect all associates to comply with this Policy and require our associates to annually certify that they have reviewed the Policy and agree to comply with it.

Any employee who believes a conflict arises between the language of the Policy and the laws, customs, and practices of the place where he or she works, or who has questions about this Policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with local management, Human Resources, the Legal Department, or through the Ethics Help Line.

Questions

Questions about situations not discussed in this Policy should be addressed to a supervisor, the Legal Department, or the corporate Human Resources Department.

This Policy is not intended to confer contractual rights of any kind upon any associate or other person identified therein, or to create contractual obligations of any kind for the Company, nor is compliance with this Policy a guarantee of continued employment with Snap-on. Since the Company's goals related in this Policy are subject to change, the Company retains the right to amend this Policy in its sole discretion, at any time, with or without notice.