

# GOVERNMENT AFFAIRS

## Political Contributions and Expenditures

As a matter of policy, Newell Brands does not use corporate funds to make contributions to support or oppose federal, state or local political parties, candidates, campaigns, ballot measures, political organizations (organized under Section 527 of the Internal Revenue Code), and/or social welfare organizations (organized under 501(c)(4) of the Internal Revenue Code). This policy is consistent with our Code of Conduct, which prohibits gift-giving as means to improperly influence business decisions and which requires charitable contributions made on behalf of the Company to be preapproved by the Company's Corporate Giving team. In addition, Newell Brands does not have a company-sponsored Political Action Committee.

Consistent with this policy, in FY 2016, Newell Brands did not make any political expenditures to the above nor does it have any intention to do so. Any contribution of Company funds or assets to any of the above would require approval by the Company's Chief Executive Officer.

## Trade/Industry Associations

Like most multinational companies, we belong to trade and industry associations, to which we pay annual dues. These groups help keep us aware of industry trends and issues. From time to time, these organizations may indirectly support us through advocacy activities that advance common themes or interests in our industry that are important to us.

## Political Engagement

Our business is affected by legislation and regulations everywhere we operate, market or sell our products. We communicate regularly with governments to give our views on proposed regulations and work to educate them on the high standards to which we hold ourselves accountable.

From time to time, we may take a position on matters of public policy that could affect our business, employees or the communities we serve. Our public policy and legislative priorities, and any political contributions and expenditures, are reviewed periodically with senior management. In addition, annually, we report to the Board's Nominating/Governance Committee, which is composed entirely of independent members, concerning government relations activities and policies, our political contributions and expenditures policy and other related topics.