

ANTI-HARASSMENT & DISCRIMINATION POLICY

PURPOSE

The Company is committed to providing a respectful, inclusive workplace. Such a workplace must be free of harassment, including sexual harassment, discrimination, and retaliation. This Policy defines specific types of conduct and behaviors that are considered harassment, discrimination, and retaliation that will not be tolerated, and identifies avenues for raising concerns.

SCOPE

This Policy applies to all officers, directors, employees, and contractors of Stanley Black & Decker, Inc., and its subsidiaries worldwide.

DEFINITIONS

Company: Stanley Black & Decker, Inc., and its subsidiaries worldwide.

Company Personnel: Officers, Directors, and employees of the Company.

Harassment:

Harassment is unwelcome conduct that is based on race, color, religion, sex (including sexual orientation, gender identity, gender expression or pregnancy), national origin, citizenship, age, disability, genetic information (including family medical history), marital, parental, or veteran status or any other classification protected by applicable laws.

Harassment becomes unlawful where 1) enduring the offensive conduct becomes a condition of continued employment, or 2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

Examples of harassment may include, but are not limited to the following:

- Physical harassment such as touching, kissing, or groping;
- Verbal harassment such as threats, slurs, epithets, nicknames, derogatory comments, sexual teasing, and requests for sexual favors;
- Nonverbal harassment such as obscene gestures or leering;
- Written communications (including electronic communications) that could offend members of a particular group, such as racial/ethnic stereotypes;
- Electronic images, photographs, cartoons, drawings, gestures, derogatory posters, or graphic/pornographic materials.

Sexual Harassment:

Sexual harassment is unwelcome conduct including sexual advances, requests for sexual favors, or other conduct of a sexual nature when:

- submission to such conduct is made a term or condition of an individual's employment either explicitly or implicitly;
- submission to or rejection of sexual conduct is used as the basis for an employment decision affecting an individual; or
- the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment can occur between employees of any gender identity and sexual orientation.

Examples of sexual harassment may include, but are not limited to the following:

- unwelcome flirtations, advances, and propositions;
- offering employment benefits in exchange for sexual favors;
- verbal abuse of a sexual nature;
- sexually explicit jokes or slurs;
- comments about an individual's body or dress;
- sexually degrading words used to describe an individual;
- leering or making sexual gestures;
- the display in the workplace of sexually suggestive objects, cartoons, videos, photos, postings or pictures;
- sending sexually explicit e-mails, text or instant messages or voicemails and other verbal, written, visual or physical conduct of a sexual nature;
- physical conduct such as unwanted touching, assault, blocking movements;
- any other sexual conduct that has the effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Discrimination:

Discrimination is unfavorable treatment for an applicant or employee merely because of the individual's race, color, religion, sex (including sexual orientation, gender identity, gender expression or pregnancy), national origin, citizenship, age, disability, genetic information (including family medical history), marital, parental, or veteran status or any other classification protected by applicable laws.

Retaliation:

Retaliation is any form of action taken against an employee or treating an employee unfavorably for reporting in good faith an actual or suspected violation of Company policy or law or for cooperating in an investigation.

POLICY

The Company prohibits intentional and unintentional harassment of any individual by another person based on their status. Company Personnel must respect the rights of their coworkers and our customers, vendors and other third parties with whom we do business. Harassing conduct in the workplace, whether committed by supervisors or non-supervisory personnel is prohibited. No supervisor shall threaten or insinuate, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect the employee's employment, evaluation, wages, benefits, advancement, assigned duties, shifts, or any other condition of employment or career development.

The Company prohibits discrimination of any individual based on their status regarding all aspects of one's employment, including hiring, assignments, promotions, transfers, compensation, benefits, layoffs, recall from layoffs, separation, access to training, education, tuition assistance, and social recreation programs.

The Company prohibits retaliation against an individual for reporting in good faith an actual or suspected violation of Company policy or law or for cooperating in an investigation.

POLICY ENFORCEMENT

All reports of harassment, discrimination, and retaliation will be promptly, and thoroughly investigated and appropriate corrective and disciplinary action will be taken, if warranted. All reports will be treated confidentially to the extent practicable under the circumstances.

The initiation of a report or the assistance in the investigation of a complaint will not adversely affect an individual's employment, evaluation, wages, advancement, assigned duties, shifts, or any other condition of employment or career development. Retaliation by another employee or by the Company for reporting in good faith violations of this policy or the law or participating in an investigation is prohibited. Any attempt at reprisal against the reporting employee will be addressed with disciplinary action, up to and including termination. Anyone who knowingly or maliciously makes a false claim of harassment, discrimination or retaliation will be subject to disciplinary action, up to and including termination.

CONTACT

For questions or concerns with this Policy you may contact your local HR Manager, or you may contact the following:

Jim Tallaksen, Vice President, Labor & Employee Relations

Phone: +1-860-827-3528

E-mail: jim.tallaksen@sbdinc.com

Blake Furman, Vice President Business Ethics & Compliance Investigations

Phone: +1-475-271-4745

Email: blake.furman@sbdinc.com

Janet Link, Senior Vice President & General Counsel

Phone: +1-860-827-5077

Email: janet.link@sbdinc.com

REPORTING OF POLICY VIOLATION

Employees who feel aggrieved because of harassment, discrimination or retaliation should communicate their concerns promptly. Please follow the following steps to report any concerns:

1. If you believe you or another employee is being subject to harassment, discrimination, or retaliation, you may raise your concerns with the person engaging in the offending conduct if you are comfortable doing so. However, please note that addressing the issue with the offending employee is not a requirement prior to reporting the concern.
2. If you are not comfortable raising your concerns with the person whose conduct is offensive, or if the offender refuses to discontinue the offensive conduct, we encourage you to contact your supervisor, site leader and/or local Human Resources representative for assistance.
3. If for any reason you are not comfortable with these channels of communication, or if the matter is not resolved to your satisfaction, please submit a report through Integrity@SBD, our confidential ethics system.

To submit a report through Integrity@SBD, go to integrity.sbdinc.com to report your concern via the Web or look for a local phone number on the Integrity@SBD pages at the end of our Code of Business Ethics. Your report may be made anonymously except where prohibited by local law.

PENALTY FOR VIOLATION OF POLICY

Harassment, discrimination and retaliation, whether by supervisors or non-supervisory personnel, in violation of this Policy and the Company's Code of Business Ethics will result in disciplinary action, up to and including termination.

RELATED DOCUMENTS/REFERENCES/APPENDICES

- Speak Up Policy
- Code of Business Ethics
- Social Media & Disclosure Policy