

## Policy Summary

This Policy sets forth guidelines by which Newell Brands, Inc. and its subsidiaries (the "Company") will provide holiday pay to U.S. employees.

# Eligibility

Unless otherwise stated below, this Policy applies to all U.S. employees.

#### **Policy Specifics**

The Company recognizes paid holidays for all U.S. employees. All U.S. employees are eligible to receive these holidays as paid time off as of their start date. Company paid holidays are announced annually and may include a number of Floating Holidays. Holidays for your location, as well as the number of Floating Holidays, will be announced annually.

Should a holiday fall on a weekend, the holiday will generally be observed on the work day closest to the holiday or another date set by the Company, or that day will be used as an additional Floating Holiday, as determined by the Company.

Due to business/production requirements, not all facilities may be able to accommodate the Company-set holidays for all or any employees. Those facilities may choose alternative dates, may designate a fixed Floating Holiday or may pay in lieu of the holiday.

In addition to fixed paid holidays, each year the Company may announce a number of Floating Holidays. Unless otherwise directed at a specific work location, you may use these days for any reason you choose. To use a Floating Holiday, you should follow the same notification and approval process required to request vacation, to ensure your manager has sufficient notice and coverage. While the Company will make every effort to accommodate your choice of Floating Holiday, occasionally the request may be declined due to business needs. Floating Holidays must be used within the calendar year they are announced, and they will not carry over into the following year. Unused Floating Holidays will not be paid out upon termination of employment.

Time off without pay may be granted to employees who observe additional religious holidays not recognized by the Company and that exceed the number of Floating Holidays, provided the time off does not create an undue hardship for the Company.

The following conditions apply to this Holiday Policy for all salaried employees:

- Holiday pay is computed at our base rate of pay and regular work schedule. Shift differentials will be included in holiday pay, but other forms of premium pay and overtime will not affect holiday pay.
- Part-time employees will receive holiday pay equal to their regularly scheduled workday. For example, an employee who works 5 hours per day would receive 5 hours' holiday pay if regularly scheduled to work on that day.
- Holidays will not be paid to employees on any type of unpaid leave unless otherwise required by law. Employees may, however, substitute Floating Holidays for unpaid leave.
- Holidays falling within an approved scheduled vacation will be paid as holiday pay, and a vacation day need not be used for that holiday.

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In addition to the above conditions for salaried employees, the following conditions also apply to this Holiday Policy for all hourly and salaried nonexempt employees:

- Employees must work as scheduled on the last workday before and the first workday following the holiday pay, unless on approved time off.
  - This rule does not apply to Floating Holidays. Employees need not work the workday before and workday after a Floating holiday to receive holiday pay for that Floating Holiday.

## **Process for Exceptions**

The Company expects no exceptions will be needed to the Holiday Policy. Exceptions to this Policy will only be considered in extreme and exceptional cases. A request for an exception should be documented in writing and state a reasonable, justifiable and legitimate business need. Such request for an exception should be made to your Vice President of Human Resources. Routine exception requests are discouraged.

## Corrective Action for Non-Compliance

Failure to comply may include corrective action and enforcement subject to local legal requirements.

Questions about this Policy should be directed to Human Resources.

The Company's intent is to comply with all controlling federal, state, and local laws, rules, regulations and ordinances. If any portion of this Policy conflicts with any such law, the controlling law applies. He Company may modify, revise, amend or delete its policies and procedures in whole or in part, with or without notice, as it deems necessary or appropriate and/or to comply with changes in the law. This Policy is not intended, nor should it be construed, as a guarantee or promise of employment for any specific length of time, or to create a contract of employment or other contractual rights.

Effective Date: January 1, 2021; previous effective date January 1, 2018

**Policy Owner:** Total Rewards

**Executive Sponsor:** Chief Human Resources Officer

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