

# ***Snap-on Incorporated***

## **U.K. Modern Slavery Act Disclosure Statement**

In accordance with Section 54 of the U.K. Modern Slavery Act 2015, this statement is being published by Snap-on Incorporated (“Snap-on”) on behalf of all of its subsidiaries that are formed in or conduct business in the U.K. and have collectively annual turnover of £36 million or more. This statement covers Snap-on’s efforts during the fiscal year ending 28 December 2019 to prevent modern slavery and human trafficking in its business and supply chains.

### ***Global Supply Chain***

Snap-on is a leading global innovator, manufacturer and marketer of tools, equipment, diagnostics, repair information and systems solutions for professional users performing critical tasks. Snap-on’s products and services include hand and power tools, tool storage, diagnostics software, information and management systems, shop equipment and other solutions for vehicle dealerships and repair centers, as well as for customers in industries, including aviation and aerospace, agriculture, construction, government and military, mining, natural resources, power generation and technical education.

Snap-on’s global supply chain is complicated and includes thousands of suppliers from countries around the globe. As with most companies that sell complicated tools and equipment, our products, whether manufactured or sourced, often contain components that include raw materials from numerous additional suppliers, and there are often many levels of suppliers between us and the supplier of the raw materials included in these components or products.

### ***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 that 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: <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. Snap-on distributes its Supplier Code to all of its suppliers annually.

### ***Supplier Compliance, Monitoring and Verification***

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 annually 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 monitors suppliers based on its assessment of the risk presented by the supplier, taking into consideration the country in which the supplier operates and the particular product or service the supplier provides. Where Snap-on has access and determines it is appropriate, Snap-on reviews the supplier's behavior for signs of trafficking in persons or violations of the Supplier Code.

### **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 provides 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 meets in person with select suppliers each year and uses these visits to help assess the supplier's awareness of, and compliance with, its Anti-Trafficking Policy as well as awareness of, and compliance with, the Supplier Code.

### **Reporting**

Snap-on provides retaliation-free means of reporting suspected trafficking activity set forth in its Anti-Trafficking Policy and Supplier Code. 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.

Any Snap-on employee that is informed of or witnesses a violation of either the Anti-Trafficking Policy or Supplier Code, or is uncertain about the proper course of action relating to the matters addressed therein, 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, employees are instructed to use the other reporting channels made available to them by Snap-on.

Likewise, 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.

Snap-on is committed to providing a safe and easy means of reporting suspected trafficking activity and is committed to prevent any form of slavery or human trafficking in its supply chain.

A handwritten signature in black ink that reads "Nicholas T. Pinchuk". The signature is written in a cursive style with a large initial "N" and a long horizontal stroke at the end.

Nicholas T. Pinchuk  
Chairman, President and  
Chief Executive Officer

February 13, 2020