



## **Norway Transparency Act Statement**

This Statement is submitted on behalf of SNA Europe Norway AS and Car-O-Liner Norge AS (collectively, "Snap-on Norway") to cover the reporting period ending 30 June 2024.

### **Criteria 1 and 2: Identification, Structure, Operations and Supply Chains**

Snap-on Incorporated, a Delaware (U.S.A.) corporation ("Snap-on" or the "Company"), is the ultimate parent company of the entire Snap-on corporate body, including SNA Europe Norway AS and Car-O-Liner Norge AS. 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 aerospace, agriculture, construction, government and military, mining, natural resources, power generation and technical education. Snap-on Incorporated also provides financing programs to facilitate the sale of its products and to support its franchise business. Products and services under a variety of notable brands are sold through the company's franchisee, company-direct, distributor and internet channels. Snap-on's common stock is traded on the New York Stock Exchange under the ticker SNA.

Founded in 1920, Snap-on is a S&P 500 company headquartered in Kenosha, Wisconsin. The company employs approximately 13,200 people worldwide and had net sales of US\$4.73 billion in 2023. Snap-on has a mobile franchise van channel in the United States, Canada, the United Kingdom, Japan, Australia, Germany, Netherlands, South Africa, New Zealand, Belgium, and Ireland with approximately 4,700 routes, of which approximately 5% are company-owned. Snap-on serves professionals in over 130 countries with more than 80,000 stock keeping units (SKUs) and has manufacturing facilities in the United States, Argentina, Belarus, Brazil, China, France, Italy, Portugal, Spain, Sweden, and the United Kingdom.

SNA Europe Norway AS and Car-O-Liner Norge AS are privately owned companies and wholly owned subsidiaries of Snap-on, with registered offices in Pob 800, 1306 Sandvika, Norway and Postboks 2182 Stubberød, 3255 Larvik, Norway, respectively. SNA Europe Norway AS and Car-O-Liner Norge AS have been operating in Norway since 1999 and 2013, respectively. SNA Europe Norway AS and Car-O-Liner Norge AS have warehouses and offices.

Snap-on Norway has 24 employees as detailed below:

- SNA Europe Norway AS has 15 employees.
- Car-O-Liner Norge AS has 9 employees.

Snap-on Norway does not retain any contractors, consultants, temporaries or seasonal workers.

Tier 1 of the supply chain of SNA Europe Norway AS consists of approximately 39 suppliers. The tier 1 suppliers include suppliers of various hand tools, cutting products, marketing, financial and accounting services, human resources, sales and other functions.

Tier 1 of the supply chain of Snap-on Car-O-Liner Norge AS supply chain consists of approximately 25 suppliers. The tier 1 suppliers include suppliers of collision repair equipment, accessories, marketing, financial and accounting services, human resources, sales and other functions.

Snap-on Norway understands that an entity's supply chain extends beyond its tier 1 suppliers.

The due diligence, risk identification and actions Snap-on has taken, which are described below, apply to Snap-on Norway.

### **Criteria 3: Risks of Abuses of Human Rights, Modern Slavery and Decent Working Conditions**

#### **Operations**

Snap-on Norway is aware that the United Nations and the Walk Free Foundation have estimated that there are approximately 50 million victims of modern slavery around the world and that every industry and sector has risks of modern slavery and other human rights abuses in its operations and supply chains. The operations of SNA Europe Norway AS include the sale of various hand tools and cutting tools and the operations of Car-O-Liner Norge AS include the manufacturing and sale of collision repair equipment and accessories. We understand that it has been estimated that approximately 20% of the documented global cases of forced labor (one kind of human rights abuse) have occurred within the manufacturing industry, and therefore, our industry poses a risk of these types of abuses.

Manufacturing is a highly cost-driven industry and therefore requires a continual focus on expense management. We understand that these pressures could put workers at risk of exploitation if suppliers or others were to seek savings by requiring long hours and forced overtime during periods of high demand as well as through wage cuts and other cost-saving measures at times of low demand or via poor working conditions. Furthermore, manufacturing often involves the use of outsourcing, sometimes to higher risk countries which may produce goods at a lower cost or provide services at lower rates.

As such, we are acutely aware that as manufacturers, the operations of SNA Europe Norway AS and Car-O-Liner Norge AS present a potential risk of human abuses, including modern slavery, and poor working conditions. Furthermore, as with most companies that sell complicated tools and equipment, our products, whether manufactured ourselves or outsourced, often contain raw materials, components or sub-assemblies, which creates additional potential exposure to the risk of human rights abuses in those supply chains.

#### **Supply Chains**

Tier 1 of the supply chains of SNA Europe Norway AS and Car-O-Liner Norge AS consists of approximately 64 suppliers, which is a relatively small cohort proportionate to Snap-on's size. We believe that the smaller size of the tier 1 suppliers increases our visibility into Snap-on Norway's supply chain and potentially reduces the risks of human rights abuses. We have enhanced our due diligence process in recent years to maintain the good visibility we have over our suppliers.

In addition, SNA Europe Norway AS and Car-O-Liner Norge AS, in collaboration with Snap-on, have reviewed and discussed current research and guidance materials relative to the products, countries and supply chains that are considered to present heightened risks of modern slavery and other human rights abuses. As such, we have developed procedures to assess the relevant risk to Snap-on throughout its businesses, including SNA Europe Norway AS and Car-O-Liner Norge AS (discussed further under Criteria 4).

In so doing, we reviewed the 64 tier 1 suppliers and considered (i) the products supplied, (ii) the geographic locations, (iii) our knowledge of each supplier's operations, and (iv) our relationships with the suppliers. Having done this, we believe that in most cases tier 1 of our supply chain presents a lowered risk for modern slavery and human rights abuses because most of the supplied goods (a) are manufactured in geographies with lower risk ratings, and (b) come from suppliers with whom we have had long relationships and therefore we have a high degree of visibility over the way they do business.

### Snap-on Norway

Of the 64 tier 1 suppliers for Snap-on Norway, 60 were located in Norway, 3 in Sweden and 1 in Denmark, which are all low-risk countries.

To control product quality and to take advantage of the deeply developed expertise of the Snap-on companies, Snap-on Norway also sources certain products and services from its related companies rather than manufacturing these products itself or sourcing them from third parties. These Snap-on entities are subject to the Snap-on Policy Against Human Trafficking (discussed below), engage in the same training programs as all other Snap-on entities, and are held to the same standards as all other Snap-on companies. As a result, Snap-on Norway has greater visibility over these entities than other suppliers in our supply chain. We believe that this common control and oversight along with the consistent training and policy expectations significantly reduces the risk posed by these related entities.

### SNA Europe Norway AS

All 39 tier 1 suppliers of SNA Europe Norway were located in low-risk regions, however we have included a consideration of other risk indicators that may assist in understanding which of the cohort are the relatively higher risk suppliers.

The relevant goods and services that these suppliers provide are various hand tools, and services. We acknowledge that these categories of goods may pose some risk.

### Car-O-Liner Norge AS

All 25 tier 1 suppliers of Car-O-Liner Norge AS were located in low-risk regions; however, we have included a consideration of other risk indicators that may assist in understanding which of the cohort have the potential to be relatively higher risk suppliers.

The relevant goods and services that these 25 suppliers provide are collision repair equipment, accessories and services. We acknowledge that these categories of goods may pose some risk.

The remaining 64 suppliers of Snap-on Norway noted above are not related entities of Snap-on so we have less visibility over these suppliers, and they form the focus of our risk assessment. While we do not believe these suppliers pose a particularly high risk of modern slavery or other human rights abuses, they are of most interest to us in our risk identification process. As such, SNA Europe Norway AS and Car-O-Liner Norge AS continue to have a dialogue with these suppliers around their approach to these matters, including through provision of our Supplier Survey and communication of the Norway Transparency Act. Snap-on Norway acknowledges that we need to be aware of the risks of modern slavery and other human rights abuses posed by our entire supply chain, not just by our tier 1 suppliers. We will endeavor to continue to take steps to further understand our more fulsome supply chain in future reporting periods.

### **Criteria 4: Actions to Assess and Address Risks**

The Snap-on Group is guided by the core beliefs and values as laid out in Snap-on's "Who We Are" statement. These values include non-negotiable workplace safety and respecting the individual.

Respect for human rights is a fundamental value at Snap-on.

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. Snap-on has adopted policies that seek to eliminate human trafficking, slavery, forced labor and child labor from its global supply chain.

## **Policies**

Snap-on formalized its commitment to protecting human rights in its global Human Rights Policy. The Human Rights 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. The Human Rights Policy covers, among other topics, slavery, child labor and human trafficking, creating a harassment-free workplace, diversity and inclusion, health and safety and working conditions. The Human Rights Policy is available at <https://www.snapon.com/Snap-on-Files/Snap-on-HumanRightsPolicy-FINAL7.15.22.pdf>.

Our Policy Against Human Trafficking and Slavery (the “Policy”) has been in place since 2016, is periodically reviewed for effectiveness and/or upgrade, and is available <https://www.snapon.com/EN/Anti-Human-Trafficking/Anti-Human-Trafficking-Policy>. The Policy is applicable to all of Snap-on’s businesses, directors, employees, agents, subcontractors and suppliers worldwide when acting within the scope of employment or contract with us. The Policy is specifically designed to build our due diligence approach and ensure compliance with the Norway Transparency Act as well as related legislation and regulations in other countries. Within this Policy we have enshrined that Snap-on will not tolerate modern slavery and that we will strive to identify any high-risk areas within our operations and supply chains.

We require those parties subject to the Policy to not engage in any form of modern slavery, comply with applicable laws, undertake proper dealings with identity or immigration documents and engage in appropriate recruitment processes, among other requirements.

Suppliers and subcontractors are required to periodically certify that they have read the Policy and will comply with our requirements and any relevant modern slavery laws.

We provide avenues for reporting and complaints including through our Ethics Help Lines. 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. The Policy provides for several forms of remediation in the event of any incidents of non-compliance.

## **Training and Tutorial**

Snap-on (including SNA Europe Norway AS and Car-O-Liner Norge AS) provides mandatory annual training including on human rights, human trafficking and slavery to employees in positions of management and employees responsible for our supply chain.

We have an online tutorial titled *Slavery and Human Trafficking in Supply Chains*, which explains that modern slavery still exists in the world and prompts the learner to consider ways of identifying, preventing, and stopping it in his or her own supply chain. The tutorial advises staff that there are millions of suspected victims of modern slavery currently around the world.

In the tutorial, examples are given of how raw materials produced by modern slavery can end up in the products we consume, such as leather, cobalt, cocoa, and coffee. We explain to our staff that supply chains include more than tier 1 suppliers and give tips on what clues to look for that might suggest human rights abuses have played a part in a product’s development. The tutorial references the relevant legislation in different jurisdictions to which Snap-on is subject. The tutorial is concluded with a questionnaire for employees to test their knowledge in the area.

We also have training modules regarding, among other topics, creating a harassment-free workplace, health and safety and our Human Rights Policy.

Our employees play a key role in our due diligence processes and these training modules are intended to ensure they retain the appropriate level of education to enable them to assist our approach, to be vigilant and to report incidents or suspicions.

## **Ethics Helpline**

The Audit Committee of Snap-on's Board of Directors has established procedures for the effective handling of human rights and other concerns. These procedures include our Ethics Helplines that can be utilized all over the world. We also have an online portal through which individuals can confidentially report risks or concerns. Finally, within the Policy Against Human Trafficking and Slavery we also provide the contact details for the United States Government's Global Human Trafficking Hotline and email address.

These avenues allow individuals to access confidential retaliation-free reporting of any concerns relating to modern slavery and human rights abuses. It is our hope that this will encourage greater honesty and openness resulting in increased visibility over risks and incidents, so that we can conduct further due diligence and enact our remedial responses as appropriate.

## **Supplier Code of Conduct**

Our Supplier Code of Conduct (the "Code") contains commitments that we expect all suppliers, regardless of location, to adhere to. This includes commitments regarding modern slavery, workplace health and safety, human rights, the environment, identity and immigration documents, recruitment practices, transportation and relocation costs, discrimination, harassment, wage laws, bribery and corruption, intellectual property and other matters.

The Code also requires specific compliance with relevant laws in other jurisdictions. The Code requires that suppliers and sub-suppliers take adequate measures to prevent, mitigate and remediate the risk of modern slavery and human rights abuses occurring within suppliers' operations and supply chains. We require our suppliers to have in place adequate policies and commitments, due diligence processes, remediation processes, reporting processes and training in relation to modern slavery and human rights.

The Code details that suppliers who utilize subcontractors to provide goods and services to Snap-on will also be responsible for the subcontracted party's compliance with the Code. In addition, suppliers are expected to take steps to ensure subcontractors adopt the commitments outlined in the Code.

Suppliers are required to periodically certify that they have read the Code and will comply with the Code and any relevant laws.

The Code also gives Snap-on the right to monitor supplier compliance with the Code through surveys and information requests and provides for remedial measures in response to any violation.

## **Supplier Dialogue**

We have also sent correspondence to the suppliers of SNA Europe Norway AS and Car-O-Liner Norge AS to alert them as to the Norway Transparency Act, and the requirements within our Policy Against Human Trafficking and Slavery and Supplier Code of Conduct. This piece of correspondence raises supplier awareness regarding modern slavery and human rights, as well as details what we can all do to mitigate risks in this area.

We also provide our suppliers with definitions of modern slavery and explanations of related risks. We foreshadow future contact from Snap-on to request information or documents we may require related to such topics.

## **Supplier Survey**

Snap-on Norway conducts an annual Supplier Survey coordinated by Snap-on. We send this survey to suppliers of both SNA Europe Norway AS and Car-O-Liner Norge AS. In this period, we reached out to tier 1 suppliers by sending the survey to all suppliers from whom we have purchased products or services more than US\$2,500 per annum. The Supplier Survey forms a key part of our due

diligence in relation to our supply chains. In connection with the distribution of the Supplier Survey, we again send suppliers our Policy Against Human Trafficking and Slavery and Supplier Code of Conduct, and we require suppliers to certify that they have read and understood both. The Supplier Survey also asks suppliers a variety of questions regarding any policies and processes that they might have in place relevant to modern slavery and other human rights issues.

### **Supplier Agreements**

We have a specific Anti-Human Trafficking Compliance contract clause (the “clause”) that is embedded in our Supplier Agreements for both SNA Europe Norway AS and Car-O-Liner Norge AS. These terms and conditions specifically require that suppliers always comply with human rights-related laws, including the Norway Transparency Act.

The clause requires specific modern slavery-related representations and warranties of our suppliers, including that they do not engage in any form of modern slavery, that they will take reasonable steps to ensure there is no modern slavery in their operations or supply chains and that if they become aware that modern slavery is taking place in their operations or supply chains, they will notify us.

The clause also restricts suppliers from taking any adverse action against an individual due to their good faith disclosure of information relating to modern slavery. It allows Snap-on to audit each supplier’s records to ensure that no breach of the clause has occurred and also requires the supplier to share relevant information in this regard.

Finally, the clause provides for remedial measures, including the right of Snap-on to withhold payment or terminate in the event of a breach.

### **Supply Chain Mapping**

We have undertaken additional steps towards mapping our supply chain and have considered its risk profile, including any high-risk areas. We examined our supply chain in the context of various modern slavery risk indicators such as geographic location and category of goods and services. We understand that our risks in this area are fluid and will endeavor to continue to gain additional understanding of our supply chain in future reporting periods.

### **Other Jurisdictions**

Snap-on and its other subsidiaries report under relevant modern slavery legislation in the United Kingdom, Australia, United States and Canada. As such, we have for some time now had multiple risk mitigation processes and policies in place throughout Snap-on, and will continue to augment our processes. However, we acknowledge that the requirements of the Norway Transparency Act are not identical to those in these other jurisdictions, and we continue to refine our approach to understand potential opportunities to improve in Norway specifically.

### **Criteria 5: Assessing the Effectiveness of our Actions**

Snap-on SNA Europe Norway AS and Car-O-Liner Norge AS have an annual review process in place for nearly all the action items we discussed under Criteria 4 above. We send our Supplier Survey and Supplier Code of Conduct to all tier 1 suppliers once per annum. Before the Supplier Survey is sent out, we conduct a review of its content and evaluate our relevant policies and Supplier Code of Conduct. For example, originally our Supplier Survey originally only encompassed legislation in the United States and through each annual review it has been updated to now cover the laws in several jurisdictions, as detailed above. We track the percentage completion rates of our Supplier Survey in each reporting period to enable us to understand whether engagement is at the desired level.

We have a team of staff members who review each of the completed Supplier Surveys. We then have a process through which we follow up with suppliers who have provided unsatisfactory answers. We have found to date that ordinarily the unsatisfactory answers are a result of

misunderstanding rather than actual non-compliance. We have adjusted our Supplier Survey annually to reflect the feedback and learnings derived from our reviews of responses and subsequent conversations with suppliers.

The Training Tutorial detailed above is also reviewed once per annum by our legal team, as well as an external firm, and is modified as necessary.

The policies discussed above direct individuals to contact our Legal or Human Resources Departments with any concerns or queries. We also have multiple reporting mechanisms as stated above. The feedback received through these avenues also assists SNA Europe Norway AS and Car-O-Liner Norge AS in assessing the effectiveness of our approach. As noted above, we also plan to continue to map our supply chains in further detail in the future, recognizing that the risks in this area are fluid.

**Criteria 6: Consultation**

As such, consultation regarding Modern Slavery between the two entities happens automatically as part of doing business given the operations of both are so tightly enmeshed and the labor-force and governance of these entities is almost entirely shared. Therefore, the risk identification and actions that have been undertaken above have been implemented and fully apply to both entities equally.

**From our Board**

Snap-on Norway has a zero-tolerance approach regarding any of its employees, agents, subcontractors, or suppliers that may be found to directly engage in modern slavery practices or other human rights abuses.

Snap-on Norway makes this Statement in accordance with Norway Transparency Act of July 2022. This Statement was considered and approved of by the Governing Board Directors of Snap-on Norway, its Principal Governing Body.



Steffen Henriksen

GM Director SNA Europe AS

Date: 12.06.2024



Emry Tack

GM Director Car-O-Liner Norge AS

Date: 12.06.2024