



Supplier Code of Conduct

The Sherwin-Williams Company has a long tradition and stellar reputation as a global leader in quality coatings, outstanding customer service, and importantly, the highest standard of honesty and integrity beyond reproach. We have a culture of excellence that revolves around our seven guiding values: *Integrity, People, Service, Quality, Performance, Innovation and Growth.*

The Sherwin-Williams Supplier Code of Conduct establishes the requirements for our business partners to operate in a manner that is consistent with our company's values and is applicable to all suppliers (and suppliers' sub-contractors) globally. The following are the principal requirements that we expect our suppliers to adhere to, to become and remain a supplier to Sherwin-Williams.

Code of Conduct

- **General Legal Compliance:** Suppliers shall comply with all laws, rules and regulations applicable to their business in their respective countries and all countries where their products or services are sold, including labor, immigration, health and safety, trade regulation and environment.
- **Use of Company Name:** Suppliers shall not use Sherwin-Williams' or its affiliates' name, trademarks, trade names, or logos for any reason without prior written authorization of an officer of Sherwin-Williams or its affiliates.
- **Conflicts of Interest:** Suppliers must not engage in, directly or indirectly, business transactions that may create a conflict of interest.
- **Child Labor:** Suppliers shall employ only workers who meet applicable minimum legal age requirements and must comply with all other applicable child labor laws.
- **Forced Labor:** Suppliers shall not engage in or support human trafficking or use any indentured bonded, prison, or forced labor, slavery or servitude.
- **Working Conditions:** Suppliers shall provide its employees with safe and humane working conditions, and maintain compliance with all applicable laws, rules and regulations regarding worker wage and hours worked, and facility safety.
- **Discrimination:** Suppliers shall promote a diverse work environment and provide a workplace free of discrimination, harassment and abuse, compliant with all applicable human rights and employment laws.
- **Financial Integrity:** Suppliers shall keep accurate books and records of its business and financial activities in accordance with accepted auditing principles, applicable laws, rules and regulations.

- **Anti-Corruption:** Sherwin-Williams expects its suppliers to act with integrity. Suppliers shall not engage (directly or indirectly) in unethical activities with public or private parties such as offering bribes, kickbacks, or other improper payments for the purpose of gaining favorable treatment. Suppliers are expected to comply with the U.S Foreign Corrupt Practices Act as well as all other anti-bribery and anti-corruption laws in the countries where they conduct business.
- **Confidentiality:** Suppliers shall not disseminate any Sherwin-Williams proprietary information. All Information learned by the supplier should be held strictly confidential and shall not be disclosed or communicated to any third party.
- **Proper Identification of Products:** Suppliers must accurately represent offered product traits and characteristics, including any trademarks, trade names, trade dress, patents, or copyrights, country of origin marking and other product data.
- **Conflict Minerals:** Suppliers will provide suitable documentation verifying the sources of conflict minerals used in products sold/provided to us.

Compliance Monitoring

Suppliers shall grant Sherwin-Williams and its representatives or agents access to their facilities and relevant records associated with the products or services provided to Sherwin-Williams.

Non-Compliance Resolution

In the event that a supplier is found to be non-compliant with the Sherwin-Williams Supplier Code of Conduct, the supplier must provide a written corrective action plan to address such deficiency. Failure to provide satisfactory documentation or to complete the action steps set-forth in on the plan may result in termination of the business relationship between the supplier and Sherwin-Williams.

Corporate Social Responsibility

Suppliers are expected to review and respect Sherwin-Williams Corporate Social Responsibility guidelines and policies published on Sherwin-Williams' website at www.sherwin-williams.com/csr/.

Purchase Order Terms and Conditions

Suppliers agree to the terms and conditions located at www.sherwin-williams.com/csr/policies/.

Reporting Violations

Violations of this policy can be reported confidentially in a local language to an independent third party that administers our ethics helpline and web portal. All reports will be forwarded to Sherwin-Williams for investigation and corrective action, if required.

- Web portal: www.sherwin.ethicspoint.com
- Phone: 1-800-SWC-True (1-800-792-8783)
- Ethics Line Phone Numbers by Country: www.sherwin-williams.com/csr/policies/