



THE PITTSBURGH PAINTS CO. GLOBAL SUPPLIER CODE OF CONDUCT

Purpose and Scope

At the Pittsburgh Paints Co. (“Pittsburgh Paints Co.”), we believe acting ethically and responsibly is simply the right thing to do and good business. Pittsburgh Paints Co. has developed this Global Supplier Code of Conduct (“Supplier Code” or “Code”) to clarify our global expectations for supplier conduct in the areas of human rights and labor, environmental management, associate health and safety and business integrity. Pittsburgh Paints Co.’s Supplier Code is intended to complement Pittsburgh Paints Co.’s Global Code of Ethics and the company’s other policies and standards referenced therein.

This Supplier Code sets forth basic principles for supplier conduct when working with Pittsburgh Paints Co. Pittsburgh Paints Co. is committed to these principles and expects the same commitment from its suppliers, vendors, contractors, consultants and other providers of goods and services who do business with Pittsburgh Paints Co. entities worldwide (“Suppliers”).

Human Rights & Labor

- **Prohibit all forms of forced or compulsory labor/modern slavery.** Suppliers shall maintain and promote fundamental human rights and will not use forced, involuntary or slave labor.
- **Prohibit the use of child labor.** Suppliers shall adhere to the minimum employment age limit defined by national law or regulation and shall comply with relevant International Labor Organization (ILO) standards.
- **Prohibit human trafficking.** Pittsburgh Paints Co. supports the policy of the U.S. and other governments prohibiting trafficking of persons. Suppliers are prohibited from engaging in any form of human trafficking, including, but not limited to, use of force, fraud or coercion to obtain labor or services, procuring or otherwise engaging in commercial sex acts, destroying or concealing a person’s identity, using misleading or fraudulent practices in recruiting employees, charging potential employees recruitment fees, or failing to provide return transportation to employees recruited from foreign countries.
- **Rights of minorities.** Suppliers will respect the legal rights of minorities and indigenous people, including land, forest, and water rights, and will not participate in any illegal forced eviction practices. Supplier utilization of land and natural resources, including acquisition, development, or lease are subject to Free, Prior, and Informed Consent (FPIC) of the affected local communities, such as women, indigenous peoples, and other marginalized stakeholders.
- **Respect employees’ right to freedom of association and collective bargaining, consistent with local laws.** Consistent with applicable law, Suppliers shall respect employees’ rights to join or refrain from joining associations and worker organizations.



- **Provide a workplace free from discrimination harassment or any other form of abuse.**
Suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions are not discriminated against on the basis of any characteristic protected by applicable law (such as race, color, creed, religion, national origin, ancestry, citizenship status, age, physical or mental disability, pregnancy, medical condition, genetic information, military or veteran status, marital status, sexual orientation, gender identity or expression, or any other legally protected status.), and are not subject to verbal, sexual or physical harassment or abuse of any kind.
- **Treat employees fairly, including with respect to wages, working hours and benefits.**
Suppliers shall comply with all applicable legal and regulatory requirements and will apply sound employee relations practices.

Environmental, Health & Safety

- **Sustainability.** Pittsburgh Paints Co.'s commitment to sustainability includes using resources efficiently, operating safe and healthful workplaces, ensuring product safety and compliance, minimizing environmental impact, and developing sustainably advantaged products and processes, as identified using Pittsburgh Paints Co.'s internal methodology and aligned with the United Nations Sustainable Development Goals (UN SDGs). Pittsburgh Paints Co. expects its Suppliers to uphold similar commitments to continuously improve their environmental, health and safety performance.
- **Safe & Healthful Workplaces.** Suppliers will ensure a safe and healthful workplace and provide services that meet applicable quality and health and safety standards. Suppliers shall proactively manage health and safety risks with the goal of providing an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry.
- **Minimize Environmental Impact.** Suppliers will conduct operations in ways that prevent harm to public health and the environment. Suppliers must be committed to use resources efficiently. Suppliers shall have processes in place to safely and sustainably manage and minimize waste, emissions, energy consumption, and water use.
- **Environmental, Health & Safety Compliance.** Suppliers will comply with all applicable environment, health and safety, and transportation laws and regulations. Suppliers shall be committed to adhere to applicable recognized environmental, health and safety consensus standards. Suppliers shall have processes in place to ensure compliance and to drive continuous improvement of their environmental, health and safety performance.
- **Product Safety & Compliance.** Suppliers will ensure that all products supplied to Pittsburgh Paints Co., and the raw materials used to manufacture these products, meet all applicable product regulatory requirements, including labeling and hazard communication, and all applicable quality and safety standards. For all products supplied to Pittsburgh Paints Co., Suppliers must be committed to transparency and must provide full disclosure of all chemicals within their products when requested by Pittsburgh Paints Co. Suppliers



shall report issues or changes immediately to Pittsburgh Paints Co. that could negatively affect the safety, regulatory compliance, quality, or public perception of a Pittsburgh Paints Co. product.

Business Integrity & Legal Requirements

- **No Bribery/Kickbacks.** Suppliers will not engage in any form of bribery or otherwise offer any incentive or kickback to any Pittsburgh Paints Co. employee, Pittsburgh Paints Co. employee's family or friends, or other representative of Pittsburgh Paints Co. in order to obtain or retain Pittsburgh Paints Co. business or secure any business advantage with Pittsburgh Paints Co.. Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other local, regional or otherwise applicable laws and regulations dealing with the bribery of government officials and commercial entities.
- **Avoid Conflicts of Interest.** Suppliers will avoid any interaction with a Pittsburgh Paints Co. employee that may conflict, or appear to conflict, with that employee acting in the best interests of Pittsburgh Paints Co. This includes offering or providing payments or employment opportunities to Pittsburgh Paints Co. employees.
- **Gifts and Entertainment.** Suppliers are prohibited from providing or offering gifts, travel or entertainment to Pittsburgh Paints Co. employees that could inappropriately influence, or reasonably appear to influence, Pittsburgh Paints Co. business decisions or attempt to gain an unfair advantage. Pittsburgh Paints Co. employees are likewise prohibited from doing the same with respect to all Pittsburgh Paints Co. business partners.
- **Fair Competition.** Suppliers will comply with all applicable laws regarding fair competition and antitrust.
- **Protect Confidential Information.** Suppliers will protect Pittsburgh Paints Co. confidential information, including personal information, and act to prevent its misuse, theft, fraud or improper disclosure. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect Pittsburgh Paints Co., its employees, its customers, the business community or the general public.
- **Data Privacy.** Suppliers shall process, store, transmit and share personal information in a manner consistent with applicable data privacy and information security laws. Suppliers shall use personal information of Pittsburgh Paints Co. employees, clients and contractors for legitimate business purpose only or as authorized by a contract with Pittsburgh Paints Co.
- **International Trade.** Suppliers shall comply with all applicable laws governing international trade, including U.S. and local import, export control and sanction laws and regulations. Suppliers will provide Pittsburgh Paints Co. with all information and documentation necessary for Pittsburgh Paints Co. to comply with import/export laws, and will implement practices and procedures to ensure security of their supply chain under applicable regulations.



- **Sanctioned Parties.** Suppliers shall not have Pittsburgh Paints Co. goods transported by any carrier or on any vessel, aircraft, truck or other conveyance that is subject to United Nations, United States, European, or National sanctions or trade restrictions or is identified on one of the lists of sanctioned or restricted parties maintained by various countries including, but not limited to, the United States, the European Union and the United Kingdom.
- **Accurate Accounting and Business Records, Money Laundering & Insider Trading.** Suppliers will create and maintain, and provide access to Pittsburgh Paints Co. upon request, complete and accurate records of all matters related to the Supplier's business with Pittsburgh Paints Co. Suppliers shall not create any off-the-book transactions with respect to Pittsburgh Paints Co., engage in any form of money laundering, or knowingly accept funds acquired through illicit means. Suppliers shall not use any confidential information in the Supplier's possession regarding Pittsburgh Paints Co. to engage in or support insider trading.
- **Conflict Minerals.** Suppliers are expected to be in compliance with the Pittsburgh Paints Co. Responsible Minerals Sourcing Policy.
- **Counterfeit Parts.** Suppliers will not utilize counterfeit parts or materials in any product supplied to Pittsburgh Paints Co. Suppliers shall therefore develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being delivered. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts and materials from entering the supply chain. If counterfeit parts or materials are detected or suspected, Suppliers must immediately notify the recipients of such counterfeit parts or materials.
- **Compliance.** In addition to the standards mentioned in this Code, Suppliers will comply with all other applicable laws in providing goods and services to Pittsburgh Paints Co. Pittsburgh Paints Co. expects Suppliers to implement systems and controls to promote compliance with applicable laws and the principles set forth in this Code, including policies, procedures, training, risk assessments, discipline, monitoring and auditing mechanisms. Suppliers should also apply these or similar principles to the subcontractors and suppliers they work with in providing goods and services to Pittsburgh Paints Co.



Reporting Misconduct and Non-Compliance with the Supplier Code

- **Monitoring & Termination.** Pittsburgh Paints Co. reserves the right to assess and monitor Suppliers' compliance with this Code. Pittsburgh Paints Co. reserves the right to terminate any agreement with any Supplier that cannot demonstrate compliance with the Supplier Code.

Suppliers who are made aware of, or reasonably suspect, any of the following should report the matter to Pittsburgh Paints Co. immediately:

- a Pittsburgh Paints Co. employee or anyone acting on behalf of Pittsburgh Paints Co. has engaged in illegal or otherwise improper conduct with respect to their business with the Supplier; or
- any non-compliant activity or violation of the Supplier Code by any employee of the Supplier which impacts Pittsburgh Paints Co.
- Violations of this Supplier Code, or questions concerning Pittsburgh Paints Co. stated expectations of Suppliers, can be communicated by contacting:

Chief Legal Officer
The Pittsburgh Paints Co.
500 Cranberry Woods Drive, Suite 300
Cranberry Township, PA 16066
LegalNotices@pittsburghpaints.com