

The Sherwin-Williams Company Human Trafficking Compliance Plan

- 1.0 In order to prevent and detect any of the prohibited activities identified in The Sherwin-Williams Company's Human Trafficking Compliance Policy (the "Policy"), the following programs, procedures, controls, and validation mechanisms (the "Compliance Plan") are hereby established:
 - 1.1 An awareness program, as set forth in Attachment A, to inform Sherwin-Williams employees about the Policy, the activities prohibited, and the actions that will be taken against the employees for violations of the Policy.
 - 1.2 A process, as set forth in Attachment B, for employees to report, without fear of retaliation, activity inconsistent with the Policy.
 - 1.3 A recruitment and wage plan, as set forth in Attachment C, that only permits the use of recruiting companies with employees trained in the Policy, prohibits charging recruitment fees to prospective employees of Sherwin-Williams, its subcontractors or agents, and ensures that prospective wages meet applicable host-country legal requirements.
 - 1.4 A housing plan, as set forth in Attachment D, if Sherwin-Williams intends to provide or arrange housing, that ensures that the housing meets host country housing and safety standards.
 - 1.5 Procedures, as set forth in Attachment E, to prevent Sherwin-Williams agents and subcontractors, at any tier and at any dollar value from engaging in activities prohibited by the Policy, and procedures, as set forth in Attachment E, to monitor, detect, and terminate any agents, subcontractors, or subcontractor employees that have engaged in such activities.
 - 1.6 Procedures, as set forth in Attachment F, for notifying the relevant contracting officer and the relevant U.S. agency inspector general of
 - 1.6.1 Any credible information Sherwin-Williams receives from any source (including host country law enforcement) that alleges a Sherwin-Williams employee, subcontractor, subcontractor employee, their agent has engaged in conduct that violates the Policy; and
 - 1.6.2 Any actions taken against a Sherwin-Williams employee, subcontractor, subcontractor employee, or their agent pursuant to the Policy.
 - 1.7 An awareness program, as set forth in Attachment G, for Sherwin-Williams employees accompanying the U.S. Armed Forces that informs Sherwin-Williams employees of their rights to hold their own identity or immigration documents; receive agreed upon wages on time; take lunch and work-breaks; elect to terminate employment at any time; identify grievances without fear of reprisal; have a copy of their employment contract in a language they understand; receive wages that are not below the legal in-country minimum wage; be notified of their rights, wages, prohibited activities prior to signing their employment contract; and

if housing is provided, live in housing that meets host country housing and safety standards.

- 2.0 The Policy and Compliance Plan shall be posted at Sherwin-Williams employees' place of work and on Sherwin-Williams internal website, if practicable. If posting at the workplace or on the internal website is impracticable, then Sherwin-Williams shall provide the Policy and Compliance Plan to each worker in writing.
- 3.0 For prime contracts with the U.S. Government for supplies (other than commercially available off-the-shelf items) acquired or services performed outside the U.S. that have an estimated value that exceeds \$500,000, Sherwin-Williams shall submit annual, based on the date of award, certifications to the relevant contracting officer certifying that Sherwin-Williams has:
 - 3.1 Implemented a compliance plan to prevent any prohibited activities identified in the Policy and to monitor, detect, and terminate any agent, subcontractor, or subcontractor employee engaging in prohibited activities under the Policy; and
 - 3.2 After having conducted due diligence, either
 - 3.2.1 To the best of Sherwin-Williams' knowledge and belief, neither it nor any of its employees, agents, subcontractors, nor any subcontractors' employees, have engaged in any such activities; or
 - 3.2.2 If abuses relating to the prohibited activities have been found, that Sherwin-Williams or its subcontractors have taken the appropriate remedial and referral actions.
- 4.0 Prior to submitting an offer for the award of a prime contract with the U.S. Department of Defense, Sherwin-Williams shall notify any of its intended subcontractors of the responsibility to report trafficking in persons violations by the subcontractor or its employees at any tier and that subcontractor employees that report suspected or actual activities inconsistent with the Policy may be protected under 10 U.S.C. 2409, as implemented in Defense Federal Acquisition Regulation Supplement ("DFARS") Subpart 203.9, from retribution for whistleblowing on trafficking in persons violations.
- 5.0 In any subcontract Sherwin-Williams issues in support of a prime contract that Sherwin-Williams holds with the Government, Sherwin-Williams shall include Federal Acquisition Regulation ("FAR") 52.222-50, Combatting Trafficking in Persons, in the subcontract's terms.¹ To the extent FAR 52.222-50 is included in any of Sherwin-Williams' contracts with other entities, Sherwin-Williams shall include that clause in any subcontract entered into in support of such contracts.
- 6.0 In any subcontract Sherwin-Williams issues in support of a prime contract that Sherwin-Williams holds with the U.S. Department of Defense that is for the acquisition of non-commercial items in an amount that exceeds \$5,500,000,

¹ To the extent the prime contract contains FAR 52.222-50, Alternate I, SWC shall include that clause in any subcontract's terms.

Sherwin-Williams shall include DFARS 252.203-7004, Display of Hotline Poster(s), in the subcontract's terms. To the extent DFARS 252.203-7004 is included in any of Sherwin-Williams' contracts with other entities, Sherwin-Williams shall include that clause in any subcontract entered into in support of such contracts.

- 7.0 In any subcontract Sherwin-Williams issues in support of a prime contract that Sherwin-Williams holds with the U.S. Department of Defense that authorizes Sherwin-Williams personnel to accompany U.S. Armed Forces deployed outside the U.S. in contingency operations, humanitarian or peacekeeping operations, or other military operations or military exercise designated by the combatant commander or as directed by the Secretary of Defense, Sherwin-Williams shall include DFARS 252.225-7040, Contractor Personnel Authorized to Accompany U.S. Armed Forces Deployed Outside the U.S., in the subcontract's terms. To the extent DFARS 252.225-7040 is included in any of Sherwin-Williams' contracts with other entities, Sherwin-Williams shall include that clause in any subcontract entered into in support of such contracts.
- 8.0 If any subcontractor to Sherwin-Williams is required to submit a certification pursuant to FAR 52.222-50, Combatting Trafficking in Persons, Sherwin-Williams shall obtain such certifications prior to the award of the subcontract and annually thereafter as calculated by the date of award.
- 9.0 At least once annually, and prior to making any certifications in connection with Paragraph 3.0 above, all Sherwin-Williams Contract Managers responsible for the performance of a contract or subcontract in support of the U.S. Government shall assess, with the assistance of the Sherwin-Williams Legal Department, whether the Policy and Compliance Plan is appropriate to the size and complexity of the contracts or subcontracts held by Sherwin-Williams and whether the Policy and Plan is appropriate to the nature and scope of the activities to be performed for the U.S. Government.
- 10.0 For purposes of compliance with the California Transparency in Supply Chains Act of 2010, Sherwin-Williams shall post a disclosure on its external website as set forth in Attachment H.

ATTACHMENT A

Awareness Program

- 1.0 All Sherwin-Williams employees must acknowledge their receipt and review of the Policy and Compliance Plan, including this and all other attachments to the Policy and Compliance Plan.
- 2.0 All Sherwin-Williams employees must participate in annual training regarding the Policy and Compliance Plan, with the training focusing on the activities prohibited under the Policy and the actions that will be taken against the employee for violations of the Policy.
- 3.0 Annual training shall be consistent with awareness training available on the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons' website at <http://www.state.gov/j/tip/>.
- 4.0 Sherwin-Williams shall post the Policy and Compliance Plan at Sherwin-Williams employees' place of work and on Sherwin-Williams' internal website, if practicable.
- 5.0 In common work areas in Sherwin-Williams' facilities, an anti-human trafficking poster shall be displayed prominently.
 - 5.1 The poster is available at the following address and website:

Defense Hotline
The Pentagon
Washington, District of Columbia 20301-1900

or

<http://ctip.defense.gov/Resources/DoD-TIP-Hotline-Posters/>
 - 5.2 An electronic version of the anti-human trafficking poster shall be made viewable on Sherwin-Williams' website.
 - 5.3 If a significant portion of Sherwin-Williams' work force's facility does not speak English, then the anti-human trafficking poster shall be displayed in the foreign language that a significant portion of the employees speak.
- 6.0 Sherwin-Williams' Legal Department is responsible for implementing the above-outlined Awareness Program.

ATTACHMENT B

Employee Reporting Process

- 1.0 Any Sherwin-Williams employee that suspects or has knowledge of any activity engaged in by any Sherwin-Williams employee, or subcontractor employee at any tier that is inconsistent with the Policy must report that activity to Sherwin-Williams Ethics Hotline at 1-800-SWC-TRUE (1-800-792-8783), to the Global Human Trafficking Hotline at 1-844-888-FREE, or help@befree.org, or to his or her supervisor.
- 2.0 Employees may make reports under Paragraph 1.0 of this Employee Reporting Process without fear of retaliation, and Sherwin-Williams employees are prohibited from retaliating against other employees making such reports.
- 3.0 Upon the receipt of a report of suspected or actual activity that is inconsistent with the Policy, Sherwin-Williams' Loss Prevention Department will ensure that the reporting employee's supervisors are instructed that the reporting employee will not be retaliated against for making the report.
- 4.0 Any employee that reports suspected or actual activities inconsistent with the Policy may be protected under 10 U.S.C. 2409, as implemented in DFARS Subpart 203.9, and other national laws from retribution for whistleblowing on trafficking in persons violations.
- 5.0 Reports of suspected or actual knowledge of activities that are inconsistent with the Policy shall be referred to Sherwin-Williams' Loss Prevention Department.
- 6.0 Upon receipt of a report of suspected or actual activity that is inconsistent with the Policy, Sherwin-Williams' Loss Prevention Department will assess the report to determine if the report is based on credible information and take appropriate action, up to and including termination, against Sherwin-Williams employees, agents, or subcontractors that violate the Policy.

ATTACHMENT C

Recruitment and Wage Plan

- 1.0 Any person or entity (the “Recruiting Person or Entity”) engaged by Sherwin-Williams to recruit prospective employees of Sherwin-Williams must be trained in the Policy.
- 2.0 Any employees, subcontractors, or agents of any Recruiting Person or Entity engaged by Sherwin-Williams must be trained in the Policy.
- 3.0 Consistent with the Policy, neither Sherwin-Williams nor any Recruiting Person or Entity retained by Sherwin-Williams may charge any prospective Sherwin-Williams employee a recruitment fee.
- 4.0 Sherwin-Williams shall ensure that the wages paid to any Sherwin-Williams employee meet the applicable host-country legal requirements.
- 5.0 Sherwin-Williams' Legal Department is responsible for implementing this Recruitment and Wage Plan.

ATTACHMENT D

Housing Plan

- 1.0 To the extent Sherwin-Williams intends to provide or arrange housing for Sherwin-Williams employees, Sherwin-Williams shall ensure that the housing meets host country housing and safety standards.
- 2.0 At least once annually, Sherwin-Williams Contract Managers shall assess whether Sherwin-Williams intends to provide or arrange housing for Sherwin-Williams employees in connection with any prime contract with the U.S. Government or in any subcontract in support of a prime contract.
- 3.0 To the extent it is determined that Sherwin-Williams intends to provide or arrange housing, Sherwin-Williams Contract Managers will coordinate with the Sherwin-Williams' Legal Department to ensure that relevant host country housing and safety standards are and will be met.
- 4.0 Sherwin-Williams' Legal Department is responsible for implementing this Housing Plan.

ATTACHMENT E

Agent and Subcontractor Prevention and Monitoring Procedure

- 1.0 In connection with any contract or subcontract in support of the U.S. Government, Sherwin-Williams shall, at least annually, require its agents or subcontractors, at any tier and at any dollar value, to provide the certification referenced in Paragraph 3.0 of the Compliance Plan (if relevant to them).
- 2.0 Sherwin-Williams shall undertake reasonable endeavors to interview all employees, subcontractors, or agents suspected of being victims of or witnesses to activities prohibited in the Policy.
- 3.0 In the event that an agent or subcontractor to Sherwin-Williams engages in activities that violate the Policy, Sherwin-Williams shall take appropriate action, up to and including termination, against agents or subcontractors that violate the Policy.
- 4.0 Sherwin-Williams' Legal Department is responsible for implementing this Agent and Subcontractor Prevention and Monitoring Procedure.

ATTACHMENT F

Notification Procedure

- 1.0 Notifications made under this Notification Procedure shall be made consistent with Sherwin-Williams' Code of Conduct
- 2.0 In the event Sherwin-Williams receives any credible information from any source (including host country law enforcement) that alleges that a Sherwin-Williams employee, subcontractor, subcontractor employee, or their agents has engaged in any conduct that violates the Policy, Sherwin-Williams shall immediately notify the relevant contracting officer(s) and inspector general(s) under relevant U.S. Government contracts of such information.
- 3.0 In the event Sherwin-Williams takes any action against its employees, subcontractors, subcontractors' employees, agency workers, their agents or suppliers in response to any activities that violate the Policy, Sherwin-Williams shall immediately notify the contracting officer(s) and inspector general(s) under relevant U.S. Government contracts of the actions taken against employees, subcontractors, subcontractors' employees, or agents.
- 4.0 Sherwin-Williams' Loss Prevention Department is responsible for implementing this Notification Procedure.

ATTACHMENT G

Awareness Program for Employees Accompanying U.S. Armed Forces Outside the United States

- 1.0 All Sherwin-Williams employees must acknowledge their receipt and review of the Policy and Compliance Plan, including this and all other attachments to the Policy and Compliance Plan.
- 2.0 Sherwin-Williams employees accompanying U.S. Armed Forces outside the U.S. shall have the right to
 - 2.1 Hold their own identity or immigration documents;
 - 2.2 Receive agreed upon wages on time;
 - 2.3 Take lunch and work breaks;
 - 2.4 Elect to terminate employment at any time;
 - 2.5 Identify grievances without fear of reprisal;
 - 2.6 Have a copy of their employment contract in a language that they understand;
 - 2.7 Receive wages that are not below the legal in-country minimum wage;
 - 2.8 Be notified of their rights, wages, and prohibited activities prior to signing their employment contract; and
 - 2.9 If housing is provided, live in housing that meets host-country housing and safety standards.
- 3.0 The rights identified in Paragraph 2.0 of this Awareness Program shall be posted in English (and in any foreign language(s) spoken by a significant portion of the workforce) in the workspaces of Sherwin-Williams employees accompanying U.S. Armed Forces outside the U.S.
- 4.0 Sherwin-Williams shall enforce the rights of Sherwin-Williams personnel supporting the U.S. Armed Forces outside the U.S.
- 5.0 Sherwin-Williams' Legal Department is responsible for implementing this Awareness Program.

Attachment G

Disclosure Required by the California Transparency in Supply Chains Act of 2010

- 1.0 The disclosure described below shall be posted on Sherwin-Williams' [external] website with a conspicuous and easily understood link to the required information placed on Sherwin-Williams' homepage.
- 2.0 The disclosure shall disclose to what extent, if any, Sherwin William performs each of the following:
 - 2.1 Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.
 - 2.2 Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.
 - 2.3 Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.
 - 2.4 Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.
 - 2.5 Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.
- 3.0 At least once annually, Sherwin-Williams' Legal Department will review the disclosure on its website and determine if any updates to the disclosure are required.