

Fortune Brands Home & Security: Global Citizenship Program

Supplier Code of Conduct

Introduction

At Fortune Brands Home & Security and our operating companies (together, the “Company”), we know that strong corporate values support our vision of being the foremost global consumer home products company that helps people feel secure while fulfilling their dreams as homeowners. These values of treating everyone with dignity and respect, executing our mission with honest and ethical operations and emphasizing teamwork with accountability are vital to the success of each of our operating companies and the corporation as a whole. Our corporate success is dependent on our relationship with our co-workers, our reputation and integrity with suppliers and investors, and respect for each community in which we work and live.

Our suppliers also play an important role in supporting the Company’s vision and goals.¹ As a result, while they are independent businesses, we expect them to share similar operating philosophies and values. To that end, we have developed this Supplier Code of Conduct, (the “Code”) which aligns with our overall Global Citizenship Program, to clearly communicate our expectations of our suppliers in the work they perform and the services they provide to the Company. By requiring our suppliers to comply with the Code, we demonstrate our leadership within the business community. Further, we enhance the reputation of our brands, improve our ability to attract and retain the best talent, and strengthen the relationships with our suppliers. Should any supplier feel that this policy is not being supported, they should report concerns through the Company’s helpline at 855-212-7613 or website at www.FBHScompliance.com.

Code of Conduct Elements for Suppliers

1. Working Conditions/Health and Safety
2. Child Labor
3. Forced Labor
4. Discrimination
5. Working Hours
6. Wages and Benefits
7. Environmental
8. Management Systems
9. Anti-Corruption and Anti-Bribery
10. International Trade Compliance
11. Suppliers/Contractors

¹ Although we expect our suppliers to comply with the Code, they remain independent contractors and nothing in the Code, or their compliance with the Code is intended to or does change the nature of that relationship.

1. Working Conditions / Health and Safety

- We expect that you will provide your employees with a safe and healthy working environment. We likewise expect that you will take adequate steps to reduce risks associated with occupational illnesses or injuries within the workplace, and provide adequate means of evacuation and train your employees in emergency preparedness.
- We expect that you will provide your employees with appropriate training on managing safety and health issues in the workplace. If you provide dormitory facilities for your employees, we expect them to be clean, safe and meet the basic needs of your employees.

2. Child Labor

- All of your employees must meet or exceed the minimum age requirements of applicable law, but in no event shall workers under 15 years of age be employed to work on Company business. Depending on the nature of the work being performed, the Company may seek to limit employees you use for Company business to workers over 18 years of age.

3. Forced Labor

- We do not condone any illegal labor practices. This includes, but is not limited to; the use of forced or bonded labor, slavery, human trafficking, or involuntary prison labor.

4. Discrimination

- We prohibit engaging in or supporting discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, national origin, caste, sexual orientation, religion, age, gender, disability, political affiliation, veteran status or any other characteristics protected by applicable law.
- We expect you to respect your employees' observance of tenets or practices relating to race, national origin, caste, sexual orientation, religion, age, gender, disabilities, political affiliation, veteran status or any other characteristics protected by applicable law.
- We do not condone any behavior, including gestures, language and physical contact, that is sexually coercive, threatening, abusive or exploitative or in any way creates a hostile work environment. These abuses include, but are not limited to, sexual harassment, corporal punishment, mental or physical coercion, and physical abuse.
- We expect you to refrain from disciplining or otherwise discriminating against any employee for providing information concerning compliance with this Code.

5. Working Hours

- We expect you to comply with applicable laws and industry standards on working hours in the country of manufacture.

6. Wages and Benefits

- The wages and benefits offered to your employees must, at a minimum, meet or exceed all applicable legal requirements and standards.

7. Environmental

- We expect you to conduct your business such that it is in compliance with all applicable environmental laws and regulations.

- We expect you to promote protection of the environment and the conservation of natural resources.
- We expect that all products you supply to the Company will comply with all applicable environmental regulations, including, but not limited to California Proposition 65, California Air Resources Board regulations, European regulations and directives, such as, but not limited to, REACH, RoHS and WEEE.

8. Management Systems

- Management will communicate this Code to employees. Any local policy must be consistent with the requirements set forth in this Code.
- Internal management systems will include practices to include investigating, addressing and responding to the concerns of employees with regard to compliance with this Code.
- Management will periodically review the adequacy, suitability and continuing effectiveness of the systems implemented to meet the requirements of this Code. Additionally, appropriate corrective actions will be implemented to address any identified non-conformance

9. Anti-Corruption and Anti-Bribery

- We maintain a strict, zero-tolerance policy for bribery. No supplier shall offer payments to any person, and in particular, a government official, political figure, employee or officer of an NGO, or any person claiming to have access to or influence over such person, to induce that person /official /candidate/ politician/NGO officer to affect any act or decision in a manner involving the business or products of the Company.
- Political or charitable contributions, whether monetary or not, must never be made to influence or reward a governmental act or decision relating to the business or products of the Company.
- We expect that you exercise care in selecting independent third parties such as sub-suppliers, distributors, and agents, by employing only reputable persons not affiliated with any government and will pay only reasonable compensation for the services provided.

10. International Trade Compliance

- We expect you to comply with all applicable laws and regulations governing (a) the export, re-export and retransfer of goods, technical, data, software, and services;(b) import of goods, including payment of all duties and compliance with the North American Free Trade Agreement: (c) economic sanctions and embargoes, and (d) U.S. anti-boycott requirements.

11. Suppliers/Contractors

- We will take appropriate measures to ensure that our suppliers and contractors are informed of this Code and its requirements and will establish and maintain appropriate procedures to evaluate and select suppliers based on their ability to demonstrate compliance with the requirements of this Code and will maintain reasonable evidence that the requirements of this Code are being met. The Company's verification process may include certification forms, written questionnaires, audits (announced or unannounced) or inspections (from internal or external consultants), or other appropriate documentation.
- We reserve the right to evaluate sub-suppliers and sub-contractors as needed to demonstrate compliance with this Code. However, it is the suppliers' responsibility for compliance of their sub-suppliers with this Code.