

**31 May 2024**

**The California Transparency in Supply Chains Act (2010)  
The UK Modern Slavery Act of 2015 (Section 54)  
The Canada Fighting Against Forced Labour and  
Child Labour in Supply Chains Act**

**For the year ended 31 December 2023**

The Sherwin-Williams Company, its direct and indirect wholly owned subsidiaries (“we” and “the Company”) is committed to fair labor practices and human rights in its business and supply chain. Our actions in this area are as follows:

**Structure and Supply Chains**

The Sherwin-Williams Company is an Ohio USA corporation and is a New York stock exchange listed (ticker SHW), publicly traded, multinational company with over 64,000 employees and over USD 23 B in sales. Sherwin-Williams is engaged in the manufacture, distribution and sale of paints, coatings and associated products. Our supply chain begins with raw materials. We source raw materials and intermediates in the following categories; monomers, polymers, surfactants/dispersants, solvents, epoxy, isocyanates, and packaging (cans, labels, totes and accessories). We purchase over 30,000 unique raw material part numbers from over 1,100 suppliers on a worldwide basis. We manufacture paints and coatings at manufacturing facilities that we own, using the raw materials described above. We occasionally use toll, or contract, manufacturers, to produce intermediates or finished goods. We deliver products to customers and our company owned stores in the United States and Canada through a fleet of company operated vehicles. We use third party logistics providers on a worldwide basis as well as in the US and Canada.

**Risk Assessment and Management**

Human trafficking, forced labor and child labor are subjects that are fundamental in our annual (and ongoing) enterprise wide risk assessment process.

**Activities to Verify our Business and Product Supply Chains**

We commit resources to periodically evaluate our business and supply chain. Our model is to prevent, monitor, detect, and respond to instances of human trafficking, child labor, and forced labor in our business and supply chain. We employ processes and tools for due diligence on our employees, our suppliers, and subcontractors at all tiers. We have developed risk-based processes in order to review the practices of participants in our supply chain and to ensure they are compliant with applicable laws, including those related to human rights. Contracts with suppliers reserve the right to audit all suppliers’ records and facilities to assure compliance with applicable laws. We maintain several ways that an employee or third party can report human trafficking, including a reporting hotline.

**Certifications**

We require, through our purchase order terms and conditions, as well as our Supplier Code of Conduct incorporated therein, direct suppliers and subcontractors to certify, to the best of their knowledge and belief, that they do not engage in or support human trafficking, slavery or servitude, or use any indentured, bonded, prison, or forced labor.

**Accountability**

We maintain internal accountability standards and procedures for employees, suppliers and subcontractors. Failure to comply with such policies can result in adverse actions, including termination of employees, suppliers and subcontractors. We are not aware of any circumstance in which vulnerable families have experienced financial loss in relation to our initiatives regarding forced or child labor in our operations and supply chains. However, if such an impact occurred, we would examine and execute appropriate measures through our enterprise-wide community engagement organization and activities.

**Training**

We have implemented a company-wide training and awareness program on the prohibition against human trafficking and forced labor. Our program addresses the definitions of human trafficking, child labor and forced labor, how to minimize potential risks, types of prohibited activities, how to report suspected violations, and the importance of these issues to the Company. We provide detailed training to employees and management with direct responsibility for supply chain management.

**Effectiveness and Continuous Improvement**

In keeping with our ongoing commitment to continuous improvement, we evaluate our training and awareness program each year in order to assess needs and to address changes in applicable laws and circumstances.