

## NON-HARASSMENT POLICY

The Sherwin-Williams Company is committed to maintaining a work environment that is free of discrimination. In keeping with this commitment, we will not tolerate harassment of our employees or by our employees in connection with their work or other paid or unpaid employment-related activities. This applies to anyone, including any manager, supervisor, co-worker, vendor, customer, or other business invitee.

This policy prohibits harassment involving conduct whether verbal, physical or visual, that is based on race, color, religion, sex (gender or sexual harassment), national origin, protected veteran status, disability, age, sexual orientation or any other consideration made unlawful by federal, state or local laws.

One type of harassment that deserves special mention is sexual harassment, which involves sexual advances, requests for sexual favors, or other physical, verbal or visual conduct of a sexual nature. While an exhaustive list of such prohibited conduct is not possible, some examples include, but are not limited to: offers of positive employment-related consequences for sexual favors; threats of negative employment-related consequences for denials of sexual favors; physical contact of a sexual nature, such as grabbing, pinching, patting, hugging, kissing, brushing, rubbing, etc.; express or implied requests for sexual conduct; inquiries or comments about one's own or another's sex life, sexual ability or sexual body parts; displays of sexually-explicit, sexually-suggestive, foul or obscene photographs, cartoons, printed, graphic or other visual material or objects; written or verbal references to sexual conduct; inappropriate references to the male or female anatomy; whistling, hooting, leering or staring in a sexually-suggestive manner; telling or distributing sexual jokes; sexually-oriented "kidding," "teasing," or "practical jokes;" and vulgar or obscene language. Such conduct may be unlawful when it involves any of the following conditions:

- (1) submission to the conduct is an explicit or implicit term or condition of employment,
- (2) submission to or rejection of the conduct is used as the basis for an employment decision, or
- (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

In addition to sexual harassment, harassment is likewise prohibited based on any of the reasons listed above (race, color, religion, etc.). While an exhaustive list of such prohibited conduct is not possible, some examples include, but are not limited to: racial, ethnic or religious slurs, jokes, or derogatory remarks; jokes or comments about gender specific traits; comments reflecting stereotypes or cultural biases; and photographs, cartoons, printed, graphic or other visual material or objects which others may reasonably find offensive or degrading. Such conduct may be unlawful when it affects employment opportunities, interferes unreasonably with an individual's work performance, or creates an intimidating, hostile or offensive working environment.

This policy goes beyond simply prohibiting harassment that is unlawful. Sherwin-Williams intends to foster a work environment in which everyone is treated with courtesy and respect. Accordingly, this policy prohibits conduct that is inappropriate in the work environment, even when that conduct is not necessarily illegal (for example, when it does not result in the adverse consequences required to establish a violation under law).

You are responsible for helping to assure that our workplace is free of harassment. If you feel that you have experienced or witnessed harassment, tell the offending individual to stop the objectionable action. Often times, a firm comment from you is all that is necessary for the objectionable conduct to end. Also, inform the local Human Resources representative, the Group and/or Division Human Resources representative or Vice-President of Human Resources, at the numbers listed below.\* Further, if someone advises you that he or she has experienced or witnessed harassment, tell that individual of the above obligations and that you must advise Human Resources, and then advise Human Resources. We realize that these matters may involve sensitive or embarrassing issues, but the Company treats all complaints seriously. However, we cannot deal effectively with harassment until we are informed of it. Do not wait until the conduct becomes severe or pervasive to report it. It is a violation of this policy, and may be unlawful to retaliate against anyone who reports observed conduct, submits a complaint, participates in an investigation regarding a complaint or otherwise participates in a proceeding or hearing by any governmental agency or commission. Therefore, you are assured no such retaliation will be tolerated.

Our policy and the law require that we investigate all such complaints thoroughly and promptly. We will maintain confidentiality throughout the investigatory process to the extent practical and consistent with our obligation to undertake a full investigation.

We will review our findings with the appropriate parties at the conclusion of the investigation. If the investigation confirms that harassment or other inappropriate conduct has occurred, we will take appropriate corrective action, up to and including immediate termination of employment.

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