



SHERWIN-WILLIAMS

The Sherwin-Williams Company

Modern Slavery Act 2015 Section 54 Statement

Sherwin-Williams Diversified Brands Limited (“we”) is committed to fair labor practices and human rights in its business and supply chain. Our actions in this area are as follows:

Verification of our Business and Product Supply Chains

We commit resources to periodically evaluate our business and supply chain. Our model is to monitor, detect, and prevent instances of human trafficking and slavery 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 are in the process of developing risk-based audit tools and processes in order to review whether the practices of participants in our supply chain 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.

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 neither they do not engage in or support human trafficking or use any indentured bonded, prison, or forced labor, slavery or servitude.

Internal 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 for employees, suppliers and subcontractors.

Training

We are in the process of developing and implementing training for employees on the recognition and mitigation of forced labor and human trafficking, particularly in our supply chain.

This Statement relates to the financial year ending 31 December 2016 and has been approved by the Board of Sherwin-Williams Diversified Brands Limited.

Nicola Budge

Supply Chain Director

16 June 2017