The Sherwin-Williams Company

Statement on UK Modern Slavery Act of 2015 (Section 54) and California Transparency in Supply Chains Act

Sherwin-Williams UK 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 have developed a risk-based audit tool and are utilising the tools 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. Recently, we began to evaluate recently enacted, as well as several pending, laws on supply chain risk in various countries, and to plan enhancements on human trafficking prevention in accordance with such laws.

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.

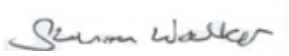
Training

We have implemented and embedded a company-wide training and awareness program on the prohibition against human trafficking and forced labor. Our program addresses the definitions of human trafficking 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 also provide detailed training to employees and management with direct responsibility for supply chain management.

As a key part of the training program, we have designed a custom compliance training video that specifically targets human trafficking scenarios. This video is shared annually to all employees on a worldwide basis. In 2020, we implemented a new Human Resources Management system that has allowed us to better monitor employee participation in the compliance training.

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

This statement relates to the financial year ending 31 December 2022 and has been approved by the Board of Sherwin-Williams UK Limited.



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Simon Walker

Director

1 June 2023