

## **Political Engagement Policy**

### **Our Approach**

The Sherwin-Williams Company (the “Company” or “Sherwin-Williams”) believes it has a responsibility to its shareholders, employees, and customers to engage with public officials serving at the federal, state and local levels of government to advocate for positions that are relevant and impactful to our business. We conduct our political engagement activities in accordance with the laws and regulations that govern them and consistent with Sherwin-Williams’ [Code of Conduct](#), [Code of Ethics for Senior Financial Management](#) and other related governance policies and procedures. Sherwin-Williams’ political engagement is subject to oversight by the Company’s senior executive management team, and the Board of Directors receives regular updates regarding the Company’s political engagement and policy advocacy activities.

### **Political Contributions**

Sherwin-Williams does not make direct political contributions to individual candidates or national, state or local political party committees as those terms are defined by the relevant election laws. As a general matter, the Company does not directly engage in independent expenditures or electioneering communications as defined by law. Though permissible by law, the Company does not currently have a political action committee (PAC).

In limited circumstances, the Company may support legislative measures and initiatives and other organizations where the Company has determined that such activities are appropriate and in the interest of our business. Any political contribution made with Company funds or resources must be approved in advance by Sherwin-Williams’ Chief Legal Officer. While Sherwin-Williams respects its employees’ participation in the political process as private citizens, the Company’s Code of Conduct does not permit employees to cause the Company to make impermissible in-kind political contributions. As detailed in the Company’s Code of Conduct, the Sherwin-Williams policy regarding political contributions prohibits:

- Using Company email or mailing lists to promote a candidate;
- Using Company time to work or volunteer for a candidate;
- Pressuring any fellow employee, supplier, customer, vendor or partner to vote in a certain manner, make any political contribution or support any candidates; and
- Asking subordinates to purchase tickets to political fundraisers or otherwise contribute to candidates or campaigns.

Furthermore, the Code of Conduct prohibits employees from engaging in conduct that would create the impression that such employee is speaking or acting for or on behalf of Sherwin-Williams relating to any political activities without the express written authorization from the Government Affairs Department. For example, employees should not use Sherwin-Williams’ letterhead or stationery to facilitate personal political contributions.

### **Lobbying Activities**

#### *Direct Lobbying*

The Company engages with government and regulatory officials on key issues and emerging risks and opportunities significant to our Company. Our public policy advocacy efforts follow

applicable laws in each jurisdiction, and we report on these engagements and related expenses as required by law.

With respect to U.S. federal lobbying activities, the Company regularly discloses detailed information about those activities and related expenditures, including the specific policy issues on which the Company and its outside lobbying firms have engaged, the government agency or chamber of Congress contacted, and the total lobbying expenditures. That information is provided, as required by law, in quarterly reports (Form LD-2) filed with the Office of the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate. The reports are available [here](#). In addition, Sherwin-Williams files [Form LD-203](#) semi-annually, which discloses certain political and honorary contributions as required by law.

We similarly comply with all applicable requirements of U.S. state and local governments to disclose lobbying activities on the public record. Disclosures of the Company's state lobbying activities are available [here](#).

Sherwin-Williams also reports its lobbying activities in foreign jurisdictions as required by applicable law. Disclosures of the Company's lobbying activities in foreign jurisdictions are available [here](#).

In accordance with our Code of Conduct, employees and directors may not engage in any activity on behalf of Sherwin-Williams with the intent to influence legislation or rulemaking, or engage lobbyists or others to do so, without the express written authorization from Sherwin-Williams' Government Affairs Department.

Moreover, all prospective outside lobbying firms are subject to a due diligence process in advance of their retention.

### *Grassroots Lobbying*

Grassroots lobbying refers to attempts to influence legislation by affecting the opinion of the public and encouraging the audience to take action with respect to legislation. As a general matter, the Company does not make expenditures for grassroots lobbying activities.

### *Industry Associations*

Sherwin-Williams belongs to several trade associations and industry-based organizations. These groups play an important role in the industry and provide Sherwin-Williams with opportunities to engage in the legislative and regulatory process and influence matters that impact the industry, as well as matters that are critical to our customers, our employees, and the communities in which we operate. Our participation in these groups also helps Sherwin-Williams understand and manage risks associated with changing government policies and legal landscapes.

We recognize that not all industry associations' views may be fully aligned with Sherwin-Williams' views. As such, we periodically evaluate our memberships in these groups and policy alignment.

The trade associations and industry groups to which we contribute more than \$25,000 annually are listed [here](#).