

# The Transparency Act

- Statement of Due Diligence for Sherwin-Williams Norway AS for the period 01.01.2023 – 31.12.2023

## Introduction

The Transparency Act came into force on 1. July 2022, its purpose is to ensure fundamental human rights and decent working conditions. Sherwin-Williams Norway AS exceeds the threshold values of the Act and shall therefore carry out and account for due diligence assessments in accordance with the Act's system.

The requirement for an annual report is intended to ensure public access to the work of enterprises to avoid negative conditions related to the issue in question, as well as to show which due diligence assessments have been carried out.

## Ownership structure

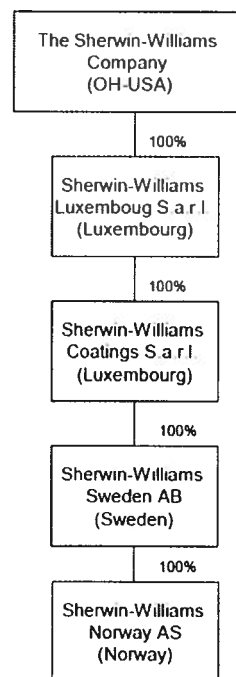
Sherwin-Williams Norway AS is part of The Sherwin-Williams Company, which is headquartered in Ohio, USA and is listed on the New York Stock Exchange (ticker SHW).

## Business description and supply chain

**The Sherwin-Williams Group** is engaged in the production, distribution and sale of paints, coatings, and related products. Our supply chain begins with raw materials. We source raw materials and intermediate products in the following categories: monomers, polymers, surfactants/dispersants, solvents, epoxy, isocyanates, and packaging (cans, labels, pouches, and accessories). The Group purchases over 30,000 unique raw material part numbers from over 1,100 suppliers worldwide. The Group produces paints and coatings at production facilities that we own, using the raw materials described above. We occasionally use contract manufacturers, to produce intermediate products or finished goods. We use third-party logistics providers all over the world, including in Norway.

**Sherwin-Williams Norway AS** manufactures and sells surface treatment products under the brand name Sherwin-Williams. The company operates in the domestic market and is wholly owned by Sherwin-Williams Sweden AB, which is also the company's largest supplier. The company is led by general manager Per-Egil Salicath and has approx. twenty employees in sales and production departments.

The production of surface treatment products takes place in Skedsmokorset, Norway, and the headquarters is also in Skedsmokorset.



Figur 1 – Ownership structure

### Internal guidelines and routines for accountability

The main responsibility for follow-up and compliance with the Transparency Act at Sherwin-Williams Norway AS is legally the board and general manager. Anchoring responsibility in the company's [guidelines](#) will then be the most important area of responsibility. Practical compliance, due diligence assessments and the duty to provide information related to the Act may be delegated to the administration.

We maintain internal standards and procedures for accountability for employees, suppliers and subcontractors and set [meaningful goals](#).

### Human resource management and loss prevention

We use processes and tools for due diligence on our employees, including annual certification in knowledge of the Group's [Code of Conduct](#) and training in anti-bribery & [anti-corruption](#). The company follow group policies on [Human Capital resources](#), [EHS](#), [Non-harassment](#) and [Equal employment opportunity](#).

We maintain multiple ways an employee or third party can report violations of these policies. Reporting may be done confidentially in a local language to an independent third party who manages our Ethics Helpline at +4780015654 or at <https://www.sherwin.ethicspoint.com>. All reports will be forwarded to Sherwin-Williams for investigation and any corrective action.

### Activities to verify our business and product supply chains

The Group allocates resources to periodically evaluate our operations and supply chain, including the ethical sourcing [of conflict minerals](#). The model is to prevent, monitor, detect and respond to breaches in our business and supply chain.

We have developed risk-based processes to review the practices of our supply chain participants and to ensure that they comply with applicable laws, including those related to human trafficking. Contracts with suppliers reserve the right to audit all suppliers' records and facilities to ensure compliance with applicable laws.

We require, through our [Purchase Order Terms and Conditions](#), as well as our [Supplier Code of Conduct](#) incorporated therein, that suppliers and subcontractors 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](#).

We have implemented a company-wide training and awareness program on the prohibition of 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.

### Accountability

Failure to comply with such [guidelines](#) may result in adverse actions, including termination of employees, suppliers, and subcontractors. We are not aware of any circumstances where 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 investigate and

take appropriate action through our organization and community engagement activities throughout the company.

#### Efficiency and continuous improvement

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



Per Egil Salicath

CEO/Chairman



James Paul Lang

Board member



Kelly Del Negro

Board member