

# Masco Corporation's Supplier Business Practices (SBP) Policy Effective July 1, 2024

Masco Corporation and its companies are committed to the highest standards of integrity and ethical conduct. Our reputation is built upon these values, and we extend these expectations to our suppliers that provide us with goods and/or services. This Supplier Business Practices (SBP) Policy outlines the minimum standards we expect from our suppliers, and on which we base our selection and continued use of our suppliers. If Masco's SBP Policy standards exceed those mandated by applicable laws or regulations, Masco's SBP Policy shall take precedence. Accordingly, we have the following expectations of our suppliers:

# **Laws and Regulations**

Our SBP Policy is in alignment with the UN Guiding Principles on Business and Human Rights and the International Labour Organization's core conventions. Suppliers shall adhere to all applicable laws and regulations in the countries in which they operate. Additionally, suppliers are expected to comply with international laws and conventions and ensure compliance with regulations such as California Transparency in Supply Chain Act, UK Modern Slavery Act, German Supply Chain Due Diligence Act (LkSG), The Fighting Against Forced and Child Labour in Supply Chains Act, and Australian Modern Slavery Act.

## **Child Labor**

Suppliers shall not employ individuals who are under the age of 15, unless local law and ILO Convention allow for a younger age than 15. Suppliers shall not employ youth under the age of 18 for hazardous work, night shifts, overtime, or for any work that may jeopardize their health and safety, education, or well-being. Suppliers shall have adequate mechanisms to verify and maintain proof of the age of workers.

#### **Forced Labor**

All labor must be voluntary. Suppliers shall not use any form of forced, bonded, indentured, trafficked, slave, prison, or any other forms of coerced labor. All workers must perform their duties voluntarily and must not experience any pressure, coercion, punishment, manipulation, deceit, or fraudulent behavior to extract labor. All workers shall have control of their personal documentation and shall not be subject to any fees for the purposes of finding a job, such as recruitment fees.

## Compensation

Suppliers shall compensate workers with wages that meet or exceed the legal minimum wage under local law or if there is no legally established minimum wage, the local industry benchmarks. Overtime work shall be compensated at a rate that is higher than the standard rate of pay, and that is in line with the requirements of local law. Additionally, imposing monetary fines as a form of disciplinary action is prohibited.

## **Working Hours**

Suppliers shall ensure that working hours comply with the maximum limit established by local law. Regardless of local laws, total work hours, including overtime, shall not exceed 60 hours per week, except in cases of emergencies or extraordinary circumstances. Workers must be given at least one day off (24 consecutive hours) for every seven days worked.

#### **Fair Treatment**

Suppliers shall treat all workers with respect and dignity. They must strictly prohibit all forms of harassment, including physical, mental, and verbal abuse. Suppliers shall exercise oversight and control over private security firms, if used, to ensure they do not infringe on the rights of workers. Suppliers are also required to establish clear and documented disciplinary policies, which should be effectively communicated to all workers to ensure their understanding and compliance.



#### Discrimination

Suppliers shall abstain from any practices that constitute discrimination against workers. This includes but is not limited to discrimination based on nationality, ethnicity, social background, marital status, health status, disability, sexual orientation, age, gender, political views, religion, or military service or status, except in limited cases where legal exceptions are applicable due to specific job requirements.

# **Freedom of Association**

Suppliers shall respect workers' right to join or form trade unions, where permitted by law, and bargain collectively, or their choice to not join or not form trade unions, without fear of reprisal, intimidation, or harassment.

#### **Grievance Mechanism**

Suppliers shall establish an effective grievance mechanism to allow workers to confidentially voice concerns or report workplace issues without fear of retaliation. Suppliers are responsible for providing an anonymous, where permitted by local law, reporting option for employees and must maintain a systematic approach to track, investigate, document, and resolve concerns or issues raised by their employees in accordance with any applicable laws and regulations.

#### **Health and Safety**

Suppliers shall maintain a workplace that upholds safety and health standards that meet local standards and should strive for standards that exceed local laws. Suppliers shall ensure that both the workplace and any provided residence and eating areas are kept clean, hygienic, and sanitary. Workers shall be provided with necessary safety training and adequate personal protective equipment provided at no cost. Suppliers shall take proactive measures to prevent workplace hazards.

# **Environment and Community Protection**

Suppliers shall comply with all relevant laws and regulations concerning community protection and environmental preservation in the communities where they do business. This includes, but is not limited to, practicing responsible forestry, and implementing measures to prevent environmental pollution, such as soil contamination, water body pollution, and air pollution. Suppliers should consistently track their energy consumption and are encouraged to proactively seek ways to lower their greenhouse gas emissions. Suppliers are encouraged to implement recycling practices and strive towards minimizing waste generation. Suppliers shall not engage in unlawful evictions or persons from land or unlawfully deprive persons of resources that constitute their livelihood.

#### **Restricted Substances and Hazardous Materials**

Suppliers shall ensure that their production, use, handling, importation, or exportation of products adheres to all relevant regulations pertaining to restricted substances and hazardous materials.

# **Responsible Mineral Sourcing**

If suppliers use tin, tantalum, tungsten, or gold in products supplied to Masco and these materials come from regions linked to armed conflict or human rights violations, namely areas that are internationally recognized as Conflict-Affected High-Risk Areas (CAHRAs), including but not limited to the Democratic Republic of Congo and its surrounding areas countries, suppliers must conduct proper due diligence regarding the origin of these materials. We do not discourage our suppliers from responsibly sourcing from this region. In cases where these materials are used, suppliers must rigorously document their due diligence processes, maintain precise records, and provide Masco with conclusive evidence verifying the origins of the materials. Additionally, suppliers are obligated to provide any further relevant information requested by Masco.

# **Confidentiality and Data Protection**

Suppliers shall protect Masco's intellectual property rights and maintain the confidentiality and security of all information provided by Masco. Suppliers shall ensure the privacy of personal information in their



business dealings, including with suppliers, customers, and employees, and comply with all relevant privacy and information security laws.

# **Subcontracting**

Suppliers shall not subcontract any part of Masco's production process without prior written authorization from Masco. Suppliers must ensure that any subcontractors used are fully compliant with Masco's SBP Policy. This includes conducting regular and comprehensive monitoring of subcontractors to ensure they adhere to these standards. Subcontractors failing to meet these requirements must not be involved in any production activities for Masco.

### **Ethical Conduct**

Suppliers shall conduct all business activities and interactions with integrity and in full compliance with all applicable laws, regulations, and ethical standards, including those regarding bribery, corruption, and unethical practices. Suppliers must implement and maintain effective systems to prevent, monitor, and report any actions of corruption, bribery, or ethical breaches within their operations. Suppliers are prohibited from presenting our employees and auditors with money, gifts, entertainment, trips, lodging, special favors, or any offerings that might be construed as bribery.

## Monitoring, Corrective Measures, Audits

Suppliers shall provide comprehensive documentation and detailed information that clearly demonstrate their compliance with this SBP Policy upon request. Suppliers must implement corrective measures to address any noncompliance or identified areas for improvement. Masco reserves the authority to conduct both announced and unannounced audits to verify adherence to its SBP Policy. Masco retains the right to immediately terminate its business relationship with any supplier found violating this SBP Policy.

# **Reporting Violations**

Suppliers and employees may report any suspected violations of SBP Policy through Masco's ethics hot-line at <a href="https://www.stand4ethics.com">www.stand4ethics.com</a>. If Masco learns about a potential violation, Masco will work to investigate the matter and mitigate or resolve it as quickly as possible. You may report anonymously, where permitted by law, and Masco will take steps, as permitted by law, to keep information related to the report confidential.