



EQUAL EMPLOYMENT OPPORTUNITY POLICY

Responsible Office: Human Resources
Policy Type: Corporate

Date Established: 9/1/79
Date Last Revised: 03/17

The Sherwin-Williams Company is an equal opportunity employer. As such, we will recruit, hire, train and promote in all job titles based only on valid job requirements. All personnel actions will be administered without regard to the following “factors”: race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, disability, age, pregnancy, genetic information, creed, citizenship status, marital status, or any other consideration prohibited by law or by contract.

After employment, employees' progress and compensation will be related to their qualifications and job performance. In particular, we will ensure that promotion decisions are based on valid requirements such as qualifications and job performance. Additionally, we will ensure that all personnel actions such as compensation, benefits, transfers, layoffs, return from layoff, Company sponsored training, education, tuition assistance, social and recreational programs, will be administered without regard to discrimination based on the “factors” listed above. This commitment of equal employment opportunity applies to all persons involved in the operations of the Company and prohibits discrimination, harassment, intimidation, threats, or coercion by any employee of the Company including managers, supervisors and coworkers.

We also will not tolerate harassment, intimidation, threats, coercion, or discrimination of employees and applicants because they have engaged or may have engaged in (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or other activity related to the administration of the laws requiring affirmative action and equal employment opportunity based on the “factors” listed above, including, but not limited to, Executive Order 11246, as amended, Section 4212 of the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended and Section 503 of the Rehabilitation Act of 1973, as amended; (3) opposing any act or practice made unlawful by such laws or their implementing regulations; or (4) exercising any other right protected by such laws or their implementing regulations.

We will comply with the following pay transparency nondiscrimination provision: The contractor (Sherwin-Williams) will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor’s legal duty to furnish information. 41 CFR 60-1.35(c).

Employees who believe that this policy has been violated are directed to contact the local Human Resources representative, the Group/Chain/Division Human Resources representative or the Vice President – Human Resources, at the numbers listed below.* If the Company determines that a violation of this or any other policy or work rule has occurred, we will take prompt corrective action, up to an including immediate termination of employment.

***HR CONTACTS-GROUP/DIVISION/LOCATION:** _____

Name	Title	Phone Number
_____	_____	_____
_____	_____	_____
_____	_____	_____

(Employees at sites in which the foregoing information is missing and employees in other Groups/Divisions/Locations can contact Employee Relations at (216) 566-2363 for referrals to HR Contacts within their Group/Division/Location)