

EQUAL EMPLOYMENT OPPORTUNITY POLICY

The Sherwin-Williams Company is an equal opportunity employer. As such, we will recruit, select and hire, on the basis of individual qualifications. Company policy prohibits unlawful discrimination based on race, color, religion, sex, national origin, protected veteran status, disability, age, sexual orientation or any other consideration made unlawful by federal, state or local laws.

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 unlawful discrimination.

This commitment of equal employment opportunity applies to all persons involved in the operations of the Company and prohibits unlawful discrimination, harassment, intimidation, threats, or coercion by any employee of the Company including managers, supervisors and co-workers.

Employees who believe they have been subjected to unlawful discrimination must use the appropriate procedure to bring the problem to the Company's attention. Employees who are unaware of the appropriate procedure should consult their local Human Resources representative, Group and/or Division Human Resources representative, or Group and/or Division Vice-President of Human Resources, at the numbers listed below.* The Company will not tolerate retaliation of any kind against an employee who utilizes or participates in these procedures.

If the Company determines that unlawful discrimination has occurred, effective remedial action will be taken, commensurate with the severity of the offense. Appropriate action will also be taken to deter any future discrimination or retaliation.

