

Global Supplier Code of Conduct

UPDATED 15-May-2020



Purpose and Scope

At PPG, we believe acting ethically and responsibly is simply the right thing to do and good business. PPG has developed this Global Supplier Code of Conduct (“Supplier Code” or “Code”) to clarify our global expectations for supplier conduct in the areas of human rights and labor, environmental management, associate health and safety and business integrity. PPG’s Supplier Code is intended to complement PPG’s [Global Code of Ethics](#) and the company’s other policies and standards referenced therein.

This Supplier Code sets forth basic principles for supplier conduct when working with PPG. PPG is committed to these principles and expects the same commitment from its suppliers, vendors, contractors, consultants and other providers of goods and services who do business with PPG entities worldwide (“Suppliers”).

Human Rights and Labor

Prohibit all forms of forced or compulsory labor/modern slavery. PPG suppliers shall maintain and promote fundamental human rights and shall not use will not use forced, involuntary or slave labor.

Prohibit the use of child labor. Suppliers shall adhere to the minimum employment age limit defined by national law or regulation and shall comply with relevant International Labor Organization (ILO) standards.

Prohibit human trafficking. PPG supports the policy of the U.S. and other governments prohibiting trafficking in persons. PPG suppliers are prohibited from engaging in any form of human trafficking including, but not limited to, use of force, fraud or coercion to obtain labor or services, procuring or otherwise engaging in commercial sex acts, destroying or concealing a person’s identity, using misleading or fraudulent practices in recruiting employees, charging potential employees recruitment fees, or failing to provide return transportation to employees recruited from foreign countries.

Respect employees’ right to freedom of association and collective bargaining, consistent with local laws. Consistent with applicable law, PPG suppliers shall respect employees’ rights to join or refrain from joining associations and worker organizations.

Promote a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse. PPG suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions and are not subject to verbal, sexual or physical harassment or abuse of any kind.

Treat employees fairly, including with respect to wages, working hours and benefits. PPG suppliers shall comply with all applicable legal and regulatory requirements and will apply sound employee relations practices.

Environment, Health and Safety

Sustainability: PPG’s commitment to sustainability includes using resources efficiently, operating safe and healthful workplaces, assuring product safety and compliance, and minimizing environmental impact. PPG expects its Suppliers to make similar commitments to continuously improve their environmental, health and safety performance. Suppliers should adhere to PPG’s Supplier Sustainability Policy available at <https://sustainability.ppg.com/>.

Safe and Healthful Workplaces: Suppliers will ensure a safe and healthful workplace and provide services that meet applicable quality and health and safety standards. Suppliers shall proactively manage health and safety risks with the goal of providing an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry.

Minimize Environmental Impact: Suppliers will conduct operations in ways that prevent harm to public health and the environment. Suppliers must be committed to use resources efficiently. Suppliers shall have processes in place to safely and sustainably manage waste, air emissions, energy consumption, and water.



Environmental, Health and Safety Compliance: Suppliers will comply with all applicable environment, health and safety, and transportation laws and regulations. Suppliers shall be committed to adhere to applicable recognized environmental, health and safety consensus standards. Suppliers shall have processes in place to ensure compliance and to drive continuous improvement of their environmental, health and safety performance.

Product Safety and Compliance: Suppliers will ensure that all products supplied to PPG, and the raw materials used to manufacture these products, meet all applicable product regulatory requirements, including labeling and hazard communication, and all applicable quality and safety standards. For all products supplied to PPG, Suppliers must be committed to transparency and must provide full disclosure of all chemicals within their products when requested by PPG. Suppliers shall report issues or changes immediately to PPG that could negatively affect the safety, regulatory compliance, quality, or public perception of a PPG product.

Business Integrity and Legal Requirements

No Bribery/Kickbacks: Suppliers will not engage in any form of bribery or otherwise offer any incentive or kickback to any PPG employee, PPG employee's family or friends, or other representative of PPG in order to obtain or retain PPG business or secure any business advantage with PPG. Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other local, regional or otherwise applicable laws and regulations dealing with the bribery of government officials and commercial entities.

Avoid Conflicts of Interest: Suppliers will avoid any interaction with a PPG employee that may conflict, or appear to conflict, with that employee acting in the best interests of PPG. This includes offering or providing payments or employment opportunities to PPG employees.

Gifts and Entertainment: PPG suppliers are prohibited from providing or offering gifts to PPG employees that could inappropriately influence, or reasonably appear to influence, PPG's business decisions or attempt to gain an unfair advantage. PPG employees are likewise prohibited from doing the same with respect to all PPG business partners.

Fair Competition: Suppliers will comply with all applicable laws regarding fair competition and antitrust.

Protect Information: Suppliers will protect PPG's confidential information, including personal information, and act to prevent its misuse, theft, fraud or improper disclosure and will comply with all applicable data privacy laws. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect PPG, its employees, its customers, the business community or the general public.

International Trade: Suppliers shall comply with all applicable laws governing international trade, including U.S. and local import, export control and sanction laws and regulations. Suppliers will provide PPG with all information and documentation necessary for PPG to comply with import/export laws, and will implement practices and procedures to ensure security of their supply chain under applicable regulations.

Sanctioned Parties: Suppliers shall not have PPG's goods transported by any carrier or on any vessel, aircraft, truck or other conveyance that is subject to United Nations, U.S., EU, or National sanctions or trade restrictions or is identified on any of the various lists of sanctioned or restricted parties maintained by the United States, the European Union or any EU-member state."

Accurate Accounting and Business Records, Money Laundering and Insider Trading: Suppliers will create and maintain, and provide access to PPG upon request, complete and accurate records of all matters related to the supplier's business with PPG. Supplier shall not create any off-the-book transactions with respect to PPG, engage in any form of money laundering, or knowingly accept funds acquired through illicit means. Supplier shall not use any confidential information in the supplier's possession regarding PPG to engage in or support insider trading.

Conflict Minerals: Suppliers are expected to be in compliance with the PPG Conflict Minerals Policy available at <https://sustainability.ppg.com/Governance/Conflict-Minerals>.

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Compliance: In addition to the standards mentioned in this Code, suppliers will comply with all other applicable laws in providing good and services to PPG. PPG expects suppliers to implement systems and controls to promote compliance with applicable laws and the principles set forth in this Code, including policies, procedures, training, risk assessments, discipline, monitoring and auditing mechanisms. Suppliers should also apply these or similar principles to the subcontractors and suppliers they work with in providing goods and services to PPG.

Reporting Misconduct and non-compliance with the Supplier Code

Monitoring and Termination: PPG reserves the right to assess and monitor suppliers' compliance with this Code. PPG reserves the right to terminate any agreement with any supplier that cannot demonstrate compliance with the Supplier Code of Conduct.

Suppliers who are made aware of, or reasonably suspect:

- a PPG employee or anyone acting on behalf of PPG has engaged in illegal or otherwise improper conduct with respect to their business with the supplier; or
 - any non-compliant activity or violation of the Supplier Code by any employee of Supplier which impacts PPG;
- should report the matter to PPG's **Vice President, Procurement** or **PPG's Chief Compliance Officer immediately**.

Violations of this Supplier Code, or questions concerning PPG's stated expectations of suppliers, can be communicated by contacting:

Vice President, Procurement
PPG Industries, Inc.
Pittsburgh, PA 15272
chiefcomplianceofficer@ppg.com

Violations of this Code may also be anonymously reported to PPG's Ethics Hotline or PPG's Chief Compliance Officer. More information about PPG's Global Code of Ethics and PPG's Ethics Hotline are available at <https://corporate.ppg.com/Our-Company/Ethics.aspx>.

Reference Materials

The latest version of the Global Supplier Code of Conduct and additional supply chain sustainability information that may be useful for your organization to ensure compliance with the Global Supplier Code of Conduct is available at: <https://sustainability.ppg.com/Business/Supply-Chain>.