

FORTUNE BRANDS INNOVATIONS, INC. SUPPLIER CODE OF CONDUCT

At Fortune Brands Innovations, Inc., including our subsidiaries (the “Company”, “Fortune Brands” or “FBIN”), we know that strong corporate values and responsible operations support our Purpose: We Elevate Every Life by Transforming Spaces Into Havens. A commitment to treating everyone with dignity and respect, executing our strategy with honest and ethical operations, and emphasizing teamwork with accountability are vital to our success.

Our supply chain is a critical element in meeting our efforts to bring innovative, sustainable and digital products to our customers in a responsible manner. It’s also vital to our success to understand and mitigate the potential risk within our supply chain related to disruptions, human rights, and workplace and environmental safety.

A “supplier” within the meaning of this Code is an entity or individual that provides goods, services or resources that are necessary for the Company’s operations, production or delivery of its own products or services. While our suppliers are independently operated, we expect each to share similar operating philosophies and values to FBIN. This Supplier Code of Conduct (the “Code”) communicates our expectations of our suppliers in the work they perform and the services they provide to the Company¹. This Code applies globally to all suppliers for any part of Fortune Brands.

Code of Conduct Elements

- 1.** Compliance with all applicable laws and regulations
- 2.** Employee working conditions and safety standards
- 3.** Forced or child labor
- 4.** Human and labor rights
- 5.** Discrimination and harassment
- 6.** Environmental protection
- 7.** Record keeping
- 8.** Management systems
- 9.** Anti-corruption and anti-bribery
- 10.** Antitrust and Competition Laws
- 11.** International trade compliance
- 12.** Suppliers/Contractors
- 13.** Confidentiality and privacy

¹ Although we expect our suppliers to comply with the Code, they remain independent contractors and nothing in the Code, or their compliance with the Code is intended to or does change the nature of that relationship.

EXPECTATIONS AND COMPLIANCE

We partner with suppliers who uphold the same strict standards for the respect of human rights, workplace safety and environmental protection in the work they perform and the services they provide.

Fortune Brands qualifies potential suppliers on the basis of several factors, including quality, reliability, financial health and adherence to our Code and support of responsible operations. We take appropriate measures to ensure our suppliers and contractors are informed of this Code and its requirements. FBIN will maintain appropriate procedures to evaluate and select suppliers based on their ability to demonstrate compliance with this Code and will maintain reasonable evidence that the requirements of this Code are being met.

The Company's verification process may include certification forms, written questionnaires, audits (announced or unannounced) or inspections from internal or external consultants, or other appropriate documentation. We take a targeted approach to supplier audits using sophisticated risk identification methods to identify the appropriate level of verification for that supplier. We partner with suppliers who show areas for improvement on corrective actions and track those actions to closure. Suppliers who fall below our standards and do not have the capacity or desire to make necessary adjustments may be removed. Fortune Brands supplements our efforts with tailored training, both internally and externally, on compliance matters, updates and best practices.

Should any supplier feel this policy is not being supported, they should report concerns anonymously through the Company's helpline at 855-212-7613 or at FBINcompliance.com. International toll-free dialing instructions can be found at www.FBINCompliance.com.

1. Compliance with all applicable laws and regulations

We expect FBIN suppliers to operate in compliance with all applicable legislation, including laws, regulations and legal requirements of the countries, states and localities in which they operate. This includes laws and regulations related to human rights, anti-corruption, trade and customs, quality, product standards, labor and employment practices, as well as health, safety and environmental protection.

Suppliers are expected to conform to generally accepted industry standards, obtain and maintain all applicable permits, licenses and registrations, and operate in accordance with permit limitations and requirements at all times.

2. Employee working conditions and safety standards

The operations of our suppliers must comply with all applicable environmental, health and safety laws, regulations and legal requirements in the countries in which they operate. FBIN expects that suppliers will provide their employees with a safe, clean, orderly, and healthy working environment. We likewise expect that you will take adequate steps to reduce risks associated with occupational illnesses or injuries within the workplace and provide adequate means of evacuation and train your employees in emergency preparedness.

- Training: We expect that you will provide your employees with appropriate training on managing safety and health issues in the workplace.
- Dormitory: If you provide dormitory facilities for your employees, we expect them to be clean, safe and meet the basic needs of your employees.

3. Forced or child labor

We do not condone any illegal labor practices. This includes but is not limited to: the use of forced or bonded labor, slavery, human trafficking, or involuntary prison labor. All your employees must meet or exceed the minimum age requirements of applicable law, but in no event shall workers under 15 years of age be employed to work on Company business. Depending on the nature of the work being performed, the Company may seek to limit employees used for Company business to workers over 18 years of age.

4. Human and labor rights

Respect for human rights is a cornerstone of how we will achieve our company Purpose. Consistent with the UN Guiding Principles on Business and Human Rights, the FBIN Human Rights Policy is guided by the International Bill of Human Rights (including the UN Universal Declaration of Human Rights), the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the principles concerning fundamental rights set out in the OECD Guidelines for Multinational Enterprises. View the [FBIN Human Rights Policy](#).

- Wages and benefits: The wages and benefits offered to your employees must, at a minimum, meet or exceed all applicable legal requirements and standards
- Working hours: We expect you to comply with applicable laws and industry standards and collective agreements on working hours, overtime, maximum hour rules, and rest periods, in the country of manufacture.
- Freedom of association: Respect the right of all workers to freely associate, to form and join trade unions of their choosing, to seek representation, to bargain collectively, and to engage in peaceful assembly, as well respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly

communicate with management regarding working conditions without fear of reprisal, intimidation or harassment.

- Grievance mechanism: Provide means for all workers and affected individuals to raise concerns, complaints and grievances in an accessible and confidential manner, and without fear of harassment and retaliation. Issues shall be addressed in a timely and respectful manner and include documentation and corrective actions.

5. Discrimination and harassment

We expect suppliers to provide equal access to employment and opportunities for all people, consistent with our Human Rights Policy. We prohibit engaging in or supporting discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, national origin, caste, sexual orientation, religion, age, gender, gender identity, disability, citizenship, political affiliation, military or veteran status, or any other characteristics protected by applicable law.

We expect you to respect your employees' observance of tenets or practices relating to race, national origin, caste, sexual orientation, religion, age, gender, gender identity, disabilities, citizenship, political affiliation, military or veteran status or any other characteristics protected by applicable law.

We do not condone any behavior, including gestures, language and physical contact, that is sexually coercive, threatening, abusive or exploitative, or in any way creates a hostile work environment. These abuses include, but are not limited to, sexual harassment, corporal punishment, mental or physical coercion, and physical abuse.

We expect you to refrain from discipline, intimidation, harassment of, or otherwise discriminating or retaliation against any employee for providing information concerning compliance with this Code.

6. Environmental protection

We expect you to conduct your business such that it is in compliance with all applicable environmental laws and regulations - and to promote protection of the environment and the conservation of natural resources.

We expect suppliers to maintain policies and management systems and initiatives to identify, prevent, mitigate and account for impacts on the environment in their own operations and their supply base. This may include but is not limited to:

- We expect suppliers to avoid pollution and actively work to prevent or mitigate accidental spills.

- We expect suppliers to strive to reduce material consumption and to use resources efficiently.
- We expect suppliers to manage all chemicals and hazardous materials in an environmentally protective way and according to applicable laws, including identification, labeling, handling, transportation, storage and disposal.
- We expect suppliers to implement programs to manage and control air and wastewater emissions, ensuring compliance and protection of human and environmental health.
- We expect suppliers to safely manage and strive to reduce waste, from generation through collection, storage, transportation and disposal.
- We expect that all products you supply to the Company will comply with all applicable environmental regulations, including, but not limited to California Proposition 65, California Air Resources Board regulations, European regulations and directives, such as, but not limited to, REACH, RoHS and WEEE.

7. Record keeping

We expect all suppliers to maintain an environment of transparency and keep accurate books and records. It is our expectation that suppliers will take corrective actions within a time frame jointly agreed upon by the supplier and FBIN to remedy any identified noncompliance.

8. Management systems

We expect suppliers' management to communicate this Code to their employees. Any local policy must be consistent with the requirements set forth in this Code.

Internal management systems will include practices to include investigating, addressing and responding to the concerns of employees with regard to compliance with this Code.

Management will periodically review the adequacy, suitability and continuing effectiveness of the systems implemented to meet the requirements of this Code. Additionally, appropriate corrective actions will be implemented to address any identified non-conformance. We expect suppliers to provide training that achieves appropriate levels of knowledge, skill and competence in management and workers to meet this Code.

FBIN maintains the right to take actions, including inspections of a supplier's facilities and worker accommodations and review of any applicable documentation to ensure our Code has been implemented and is being followed.

9. Anti-corruption and anti-bribery

Suppliers to FBIN are expected to fully comply with all Anti-Corruption laws, including but not limited to the United States Foreign Corrupt Practices Act of 1977 (FCPA), the UK Bribery Act, and the OECD Convention on Combating Bribery.

FBIN maintains a strict, zero-tolerance policy for bribery. No supplier shall offer payments to any person, and in particular, any government official, political figure, employee or officer of a Non-Governmental Organization (“NGO”), or any person claiming to have access to or influence over such person, to induce that person /official /candidate/ politician/NGO officer to affect any act or decision in a manner involving the business or products of the Company.

Political or charitable contributions, whether monetary or not, must never be made to influence or reward a governmental act or decision relating to the business or products of the Company.

We expect that you exercise care in selecting independent third parties such as sub-suppliers, distributors, and agents, by employing only reputable persons not affiliated with any government and will pay only reasonable compensation for the services provided.

10. Antitrust & Competition Laws

Suppliers are expected to be in compliance with all antitrust/competition and trade practice laws. These laws include federal and state antitrust and trade practice laws in the United States as well as the legal provisions applicable to competition and trade practices in each of the other countries where the Supplier operates.

11. International trade compliance

FBIN expects suppliers to comply with all applicable United States trade laws and customs regulations as well as those laws applicable in the countries where you do business. Applicable United States anti-boycott requirements, payment of all duties and compliance with the USMCA Agreement, trade laws and customs regulations include such matters as country-of-origin labeling, U.S. embargoes, sanctions, export controls and restrictions on doing business with “specially designated nationals” and “blocked persons.” The U.S. government maintains and updates almost daily lists of such “specially designated nationals” and “blocked persons” with whom business dealings may be prohibited or severely restricted under U.S. law. A copy of this list is available at <https://sanctionslist.ofac.treas.gov/Home/SdnList>.

We expect our suppliers to comply with applicable laws in which they operate which may include security standards such as C-TPAT compliance.

12. Suppliers/Contractors

We will take appropriate measures to ensure that our suppliers and contractors are informed of this Code and its requirements and will establish and maintain appropriate procedures to evaluate and select suppliers based on their ability to demonstrate compliance with the requirements of this Code and will maintain reasonable evidence that the requirements of this Code are being met. The Company's verification process may include certification forms, written questionnaires, audits (announced or unannounced) or inspections (from internal or external consultants), or other appropriate documentation.

We reserve the right to evaluate sub-suppliers and subcontractors as needed to demonstrate compliance with this Code. However, it is the suppliers' responsibility to hold their sub-suppliers and subcontractors accountable to the principles in line with this Code.

13. Confidentiality and privacy

We expect FBIN suppliers to develop and maintain processes to safeguard data confidentiality, privacy and accuracy. We expect suppliers to properly handle, store and secure sensitive information (including confidential, proprietary or personally identifiable information) and to comply with all applicable data privacy laws. This information shall only be used for the specific business purpose for which it was provided.

Suppliers will only receive, and are only authorized to use, confidential information as part of a nondisclosure agreement. We expect suppliers to safeguard and protect all Fortune Brands information, electronic data, and intellectual property or technologies. All information, drawings or other product-related information provided by Fortune Brands to a supplier will be treated as confidential and proprietary.

Effective November 2024

FBIN Supplier Code of Conduct
Receipt & Acknowledgement of Understanding/Agreement to Comply

As a supplier of FBIN and its subsidiaries, we have received and reviewed the FBIN Supplier Code of Conduct. We fully understand the policy contents and agree to fully comply with its expectations. It is understood that failure to comply could result in the termination of our business relationship with FBIN and its subsidiaries.

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Supplier Company Name

Supplier Company Representative

Title

Signature

Date