



Griffon Supplier Code of Conduct

Our Guiding Principles

Griffon's Guiding Principles, as embodied in our Code of Business Conduct & Ethics, apply to all our employees worldwide and provide the foundation for our operations globally. This Supplier Code of Conduct (the "Code") enlists our Supplier Partners in upholding these principles. Compliance with the Code, including in the areas of human rights, environmental and safety performance, labor practices, anti-corruption, safeguarding company assets (including IT Security), privacy and economic inclusion, will be considered in the selection of all Griffon company suppliers. We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value. This Code is applicable worldwide to all Griffon companies. As used in this Code "Griffon" shall mean Griffon Corporation and each of its operating subsidiaries, including Clopay Corporation; CornellCookson, LLC; ClosetMaid LLC; The Ames Companies, Inc.; and Hunter Fan Company.

1. Obey the law

As a responsible company, we expect our global Supplier Partners to share our commitment to following the law.

We expect our Supplier Partners to:

- Know and follow the laws that apply to them and their business;
- Treat legal requirements as a minimum standard; and
- Alert Griffon as to any material issues relating to the goods and services supplied, especially health and safety issues.

2. Conduct business with integrity

We seek business relationships based on trust, transparency, and mutual accountability.

We expect our Supplier Partners to:

- Compete fairly and ethically for Griffon's business. New suppliers will be screened for compliance with this Code;
- Conduct all business with customers (including the U.S. government and foreign governments) and vendors based on service, quality, performance, and price without giving or accepting anything of value that could influence or appear to influence the outcome of a transaction. All business must be conducted in compliance with all applicable laws, including the Convention on Combating Bribery of Foreign Officials in International Business Transactions ("OECD") and the Foreign Corrupt Practices Act ("FCPA"), both of which enforce prohibitions on the payment or transfer of anything of value to governments, government officials, political parties, political party officials (or relatives or associates of such officials), whether directly or indirectly through an intermediary, to; obtain or retain business;
- Avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate or that create a conflict of interest;
- Work with their own suppliers to promote business conduct consistent with the principles in this Code; and
- Implement a Code of Ethics at least as stringent as the Griffon Code of Business Conduct and Ethics found at [Codes of Business Conduct & Ethics | Griffon Corporation](#).

3. Keep accurate and honest records

We expect our Supplier Partners to maintain accurate and honest records. This helps us make responsible business decisions and disclose truthful and timely information to our stakeholders.

We expect our Supplier Partners to:

- Maintain books and records that reflect all transactions in an accurate, honest, and timely manner;
- Employ appropriate quality audit and compliance processes for matters such as product quality, worker health and safety, and labor and employment; and
- Disclose, on request, the location of facilities and known origins of materials to enable traceability.

4. Honor business obligations

We work with Supplier Partners who share our desire to build business relationships. This requires honest communication, mutual respect, and delivering on commitments.

We expect our Supplier Partners to:

- Share our commitment to conducting business honestly and transparently;
- Honor business obligations and manage unanticipated events in a proactive, timely, and open manner; and
- Cooperate with Griffon in its annual audits regarding compliance with this Code, particularly in the area of human rights. Griffon currently audits the compliance of priority Suppliers (those with one or more risk factors) and plans to expand audits to more suppliers in the future.

5. Treat people with dignity and respect

We expect our Supplier Partners to stand with us in prioritizing the safety, well-being and dignity of all individuals, whose talents and hard work help us deliver our products and services.

We expect our Supplier Partners to:

- Provide safe and healthy working conditions at all of their operations;
- Never use or tolerate the use of human trafficking, forced labor, or child labor as defined by the International Labour Organization (ILO), and recognize and safeguard the freedom of association;
- Foster an inclusive work environment that is free of harassment and discrimination, and promote diversity and inclusion;
- Respect employees' rights to organize and bargain collectively; and
- Meet or exceed all legal requirements for compensation and working conditions (including compliance with overtime regulations and providing for reasonable work hours); and
- Support and promote human rights, including those described in the United Nations Universal Declaration of Human Rights.

6. Protect Griffon's information, assets, and interests

We expect our Supplier Partners to protect Griffon's reputation and any information or property we entrust to them.

We expect our Supplier Partners to:

- Protect all Griffon confidential information to which they have access, including Griffon's intellectual property, trade secrets, and financial information; Safeguard any property belonging to Griffon while under their control; and
- Avoid any situations that may adversely affect Griffon's business interests or reputation.

7. Be a responsible global citizen

We count on our Supplier Partners to help Griffon with respect to its ESG commitments in a safe, responsible, and sustainable way.

We expect our Supplier Partners to:

- Maintain strict standards to promote product safety;
- Establish an Environmental, Health, and Safety policy at least as stringent as Griffon's ESG Policy;
- Strive to reduce any adverse environmental impact of their business activities by ending deforestation, minimizing greenhouse gas emissions and waste and using resources efficiently;
- Recognize that access to water is a fundamental right, and protect water resources by minimizing the use of water in their operations, avoiding contamination from their operations and minimizing the impact on water resources of surrounding communities;
- Respect the principle of free, prior and informed consent concerning the resources and tenure rights of indigenous communities; and

- Work with Griffon to implement sustainable processes and correct problems to drive continuous improvement and societal value.
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Our goal of a trusted partnership

It is our goal to build trust-based relationships with ethical Supplier Partners who follow the seven Guiding Principles in this Code. We expect our Supplier Partners to cooperate with our reasonable requests for information, certifications, and/or audit access. When there is a concern, our practice is to work with the Supplier Partner, as we may be able to help identify possible improvements. However, when an issue cannot be corrected or a Supplier Partner is unwilling to engage, we reserve the right to end our relationship with that Supplier as well as require reimbursement for any costs associated with a violation of this Supplier Code of Conduct

By working closely with our Supplier Partners, we believe we can achieve mutual success while helping local communities and the wider world thrive.

If you see or suspect any conduct or business practices that you believe violate this Code or our Code of Business Conduct and Ethics, please contact Griffon directly. You may raise a concern or get help by:

- Contacting your Griffon company representative; or
- Calling our secure Griffon Ethics Open Line at +1 (888) 298-4032.

Getting in touch with us quickly helps to prevent problems and allows us to address any problems that have already occurred. We handle all reports promptly, fairly, and as confidentially as possible.