



2022 ESG REPORT

NOVEMBER 2023



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Letter from the CEO



Ronald J. Kramer
Chairman and CEO

I am pleased to present Griffon's second annual ESG Report for 2022. Following our inaugural report last year and the launch of our comprehensive ESG strategy in fiscal year 2021, we are excited to share our progress, goals, and targets for the years to come. As we continue to evolve our approach to tracking and reporting against a range of ESG metrics, we've decided to report on a calendar year basis moving forward.

We are setting an overall goal for our business: a 30 percent reduction in the key emissions metrics - carbon emissions, air emissions, water used, hazardous waste generated, and lost time and recordable injuries - by 2030.

Griffon reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment, and Anti-Corruption. As part of our commitment, we have adopted a new Supplier Code of Conduct. These principles are aligned with our guiding values as an organization and we remain committed to ethical business practices, strong governance, focusing on enhancing sustainability and importantly supporting our communities.

In accordance with our recently updated ESG policy, our ESG program will include charitable giving of dollars and time devoted to improving our communities. We continue to donate our

time, resources and money to more than 100 charitable and community organizations.

We continue to strive to be good corporate citizens and identify other opportunities for our company and employees to make a difference. In order to measure our progress, this report captures and highlights our initiatives under the following main themes:

Environmental Performance: Despite our limited exposure to environmental risks, we are committed to environmental programs and have invested millions of dollars in energy consumption improvements, including reducing our carbon footprint at operating facilities, using renewable energy, and increasing the use of recyclable and plant-based materials in our products. We had no material environmental notices of violation or penalties in 2022.

Social Responsibility: Griffon remains committed to an inclusive and safe workplace where everyone is respected, empowered, and supported.

Our people are our greatest asset, and we are proud of the safe workplace culture that we have cultivated. We continue to make investments to enhance our facilities and training programs with an emphasis on worker health and safety. We will continue to collect employee health and safety data and compare to industry standards with a goal of being better than our peers.

We are incredibly proud of the communities in which we operate, and the help and support we are able to provide through our charitable giving and community relations efforts.

Governance: We have recently taken steps to further improve our independent, diverse, and qualified Board of Directors, which has an important role in overseeing our ESG strategy. In 2022, we declassified our Board so that each director is up for election annually and added an ESG performance metric for executive compensation, beginning with our fiscal year 2023. These changes help to ensure that we have best-in-class governance practices, with an emphasis on ESG implementation and oversight.

Griffon Corporation recognizes that as a business, we are still in the early days of our ESG journey. However, we are proud of our accomplishments to date and are committed to continuous improvement. We look forward to sharing our milestones.

Yours sincerely,

Ronald J. Kramer
Chairman and CEO

OVERVIEW





About Griffon Corporation

Griffon Corporation is a diversified management and holding company that conducts business through wholly owned subsidiaries. Griffon oversees the operations of its subsidiaries, allocates resources among them and manages their capital structures. Griffon provides direction and assistance to its subsidiaries in connection with acquisition and growth opportunities, as well as divestitures. In order to further diversify, Griffon also seeks out, evaluates and, when appropriate, will acquire additional businesses that offer attractive returns on capital. Griffon and its subsidiaries are located throughout the United States, Canada, United Kingdom, Ireland, Australia, New Zealand, Mexico, and China.



1959
Year Founded



New York, NY
Headquarters



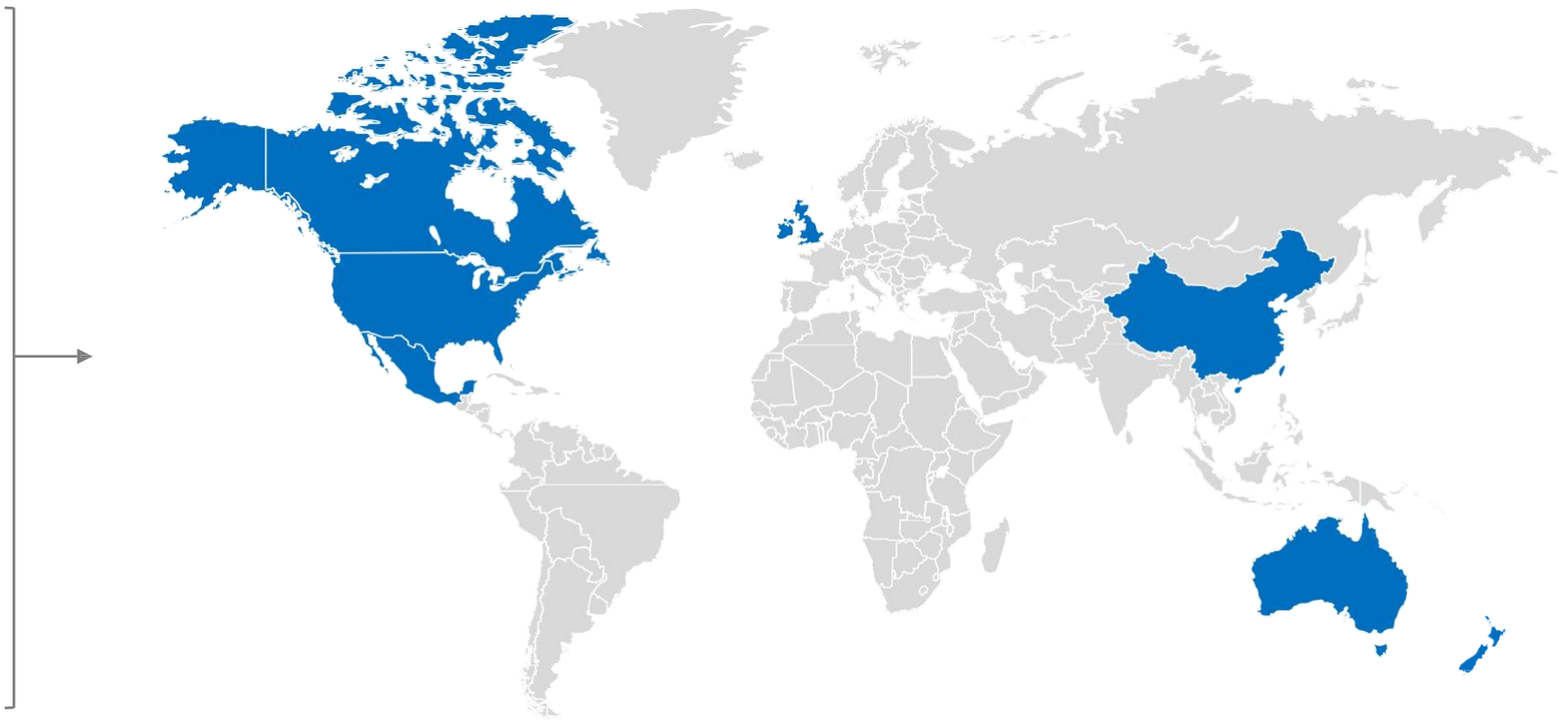
5,700
Employees Worldwide¹



23
Manufacturing Facilities²



GFF
Publicly traded on the NYSE
since 1994





Home & Building Products (HBP)

Consumer & Professional Products (CPP)

Key Facts

- HBP conducts its operations through Clopay Corporation (Clopay). HBP is a leading provider of residential and commercial sectional doors, and rolling steel door and grille products in North America
- Residential and commercial sectional garage doors are sold through professional dealers and leading home center retailers throughout North America under the brands Clopay, Ideal, and Holmes
- Rolling steel door and grille products designed for commercial, industrial, and institutional use are sold under the Cornell, Cookson and Clopay brands
- 2,900 employees¹

- CPP is a leading manufacturer and global provider of branded consumer and professional tools, ceiling fans, home storage and organization products, and landscaping products. CPP's products enhance indoor and outdoor lifestyles
- CPP sells products globally through a portfolio of leading brands including AMES, True Temper, and ClosetMaid
- CPP includes Hunter Fan, a leading provider of residential and industrial fans, which was acquired in January 2022
- 2,800 employees¹

Brands / Products





About this Report

We are pleased to be delivering our second annual ESG Report. As a sound practice of transparent reporting, we remain committed to sharing our progress against our goals and objectives. While Griffon's Inaugural ESG Report covered fiscal year 2021, which started on October 1, 2020, and ended on September 30, 2021, this and future reports will report on a calendar year basis to better align with the data collection and disclosure practices of our global operations.

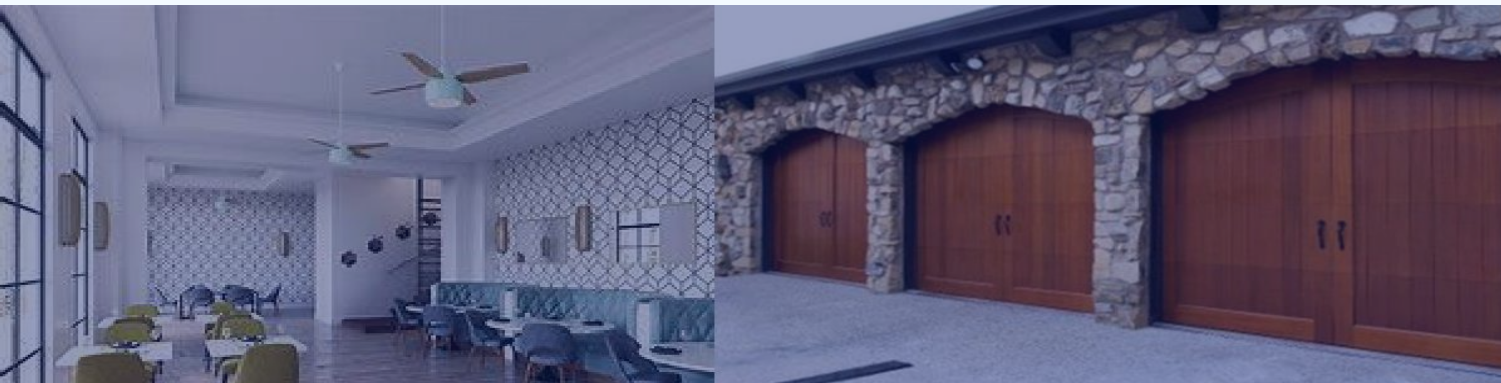
This report addresses Griffon Corporation and its wholly-owned subsidiaries (all companies controlled by Griffon). Metrics were gathered from significant operating locations, defined as locations having 25 or more employees as of January 1 of each year. This report is benchmarked against the United Nations Global Compact (UNGC) Sustainable Development Goals and the standards of the Sustainability Accounting Standards Board (SASB).

As appropriate, significant developments that have occurred since the conclusion of 2022 may be referenced and will be more fully developed in subsequent reports. This includes some significant changes to strategy and updates to Griffon's practices and policies, including the adoption of a Supplier Code of Conduct.

Significant Developments Since December 31, 2022

Global Sourcing Strategy: On May 3, 2023, Griffon announced that its CPP segment would expand its global sourcing strategy to include its long handle tool, material handling, and wood storage and organization product lines for the U.S. market. As a result, the company will be reducing its U.S. facility footprint by 1.2 million square feet by the end of Calendar 2024. Affected locations include Camp Hill and Harrisburg, PA; Grantsville, MD; Fairfield, IA; and four wood mills. As CPP shifts its sourcing to external sources, the business's new sourcing partners will have to comply with the recently adopted Supplier Code of Conduct. (See Slide 11 for additional detail.)

Board of Directors: On January 9, 2023, Griffon appointed Travis W. Cocke to its Board of Directors to fill the vacancy left by the late Admiral Robert G. Harrison.





ESG Policy

Griffon is committed to operating its businesses in a manner that adheres to strong governance practices, sustains the environment, and protects the health, safety, and well-being of its employees. Consistent with Griffon's business interests and Code of Business Conduct and Ethics, all employees must comply with our [ESG Policy](#), which commits to:

- Sustainability
- A Focus on Our Employees
- Compliance
- Human Rights and Economic Inclusion
- Stopping Human Trafficking
- Strong Governance Practices
- Integration of ESG Principles
- Collaboration with Customers, Suppliers and Contractors
- Support of Community and Government Initiatives
- Continuous Improvement
- United Nations Global Compact Sustainable Development Goals

Board and Management Oversight

The Audit Committee formally reviews the ESG report and program plan on an annual basis and discusses ESG considerations with management. The ESG Committee, composed of executives from Griffon, HBP, and CPP sets Griffon's strategy relating to ESG matters, and develops, implements, and monitors ESG initiatives and policies.

Accountability

Our sustainability and ESG efforts are managed by our executive team and the Environmental, Social, and Governance Management Committee (ESG Committee), which consists of the Griffon COO; CFO; General Counsel; Vice President, Corporate Strategy and Development; and Business Segment Presidents.

Our Audit Committee is responsible for overseeing Griffon's ESG Program. Additionally, beginning in fiscal 2023, we included ESG as a performance metric for our short-term cash incentive program for our named executive officers (NEO).

30 BY 2030 CAMPAIGN

Griffon has set a reduction target - 30% by 2030 - and committed to quantitatively tracking carbon and air emissions, water used, hazardous waste generated, lost time and recordable injuries. We will track progress against a 2022 baseline and report on that each year.



Approach to ESG

Commitment

In addition to subscribing to the [United Nations Global Compact](#), we have revised our policies to ensure that Griffon will be a responsible corporate citizen by implementing sound ESG principles. We monitor for potential human rights and human trafficking violations. We will never use or tolerate the use of human trafficking, forced labor or child labor as defined by the International Labour Organization, and require the same of our business partners. We ensure that our suppliers share our goals by requiring them to adhere to our Supplier Code of Conduct.



Monitoring & Review

ESG considerations are monitored in the same manner, and to the same extent, as financial considerations. Griffon operating companies collect metrics and periodically report to executive management on our progress in meeting environmental and social goals. We began tracking environmental impact metrics in earnest in 2021. Our data collection methods continue to improve, and this report reflects our best efforts to collect and present information relating to these metrics. Each significant operating location must calculate and inform executive management of its score for environmental and social performance monthly and quarterly.

Griffon has established an internal standard requiring that every new operating location, piece of equipment, chemical, or process change undergo review and approval by an Environmental, Health, and Safety (EHS) professional with at least five years of experience. This formal process, internally reviewed by ESG teams consisting of external and internal personnel, ensures that ESG considerations are incorporated into any change at a Griffon facility.

Management Systems

Griffon facilities utilize management systems to identify risks, design mitigating measures, confirm implementation of mitigating measures, and periodically assess program effectiveness. As a general matter, Griffon does not register its facilities to the various ISO standards because it believes that these standards are overly bureaucratic and not substantively effective.



ESG Priorities

Griffon's ESG Priorities are based on material items that we believe are of importance to our stakeholders and represent areas in which existing work has been accomplished and opportunity exists. In determining these priorities, we consulted stakeholder groups and relied heavily on the criteria established for our industries by the Sustainability Accounting Standards Board (SASB).

	Environmental Performance	Social Responsibility	Governance
Objectives	<ul style="list-style-type: none"> • Reduce CO2 footprint over time • Reduce environmental impact on the planet • Manage environmental impact from manufacturing • Encourage and facilitate recycling • Reduce waste 	<ul style="list-style-type: none"> • Keep workers safe • Ensure long-term viability and sustainability of the business • Provide tangible and outward support for the community • Sustain employee growth to support success of the business • Develop better ideas and products with a diverse workforce • Ensure all our business partners share our goals 	<ul style="list-style-type: none"> • Protect interests of stakeholders • Protect employees, suppliers, customers, and community • Prevent risks and increase organizational sustainability • Ensure commitment to ESG principles extends through supplier/supply chain activities
Metrics	<ul style="list-style-type: none"> • Energy Consumed and Percent Renewable • Wood Supply Chain Impacts • Sustainable Forestry • Management of Chemicals and Wastes • Product Lifecycle Environmental Impact • Water Consumption and Packaging 	<ul style="list-style-type: none"> • Amount of Community Involvement and Charitable Giving • Employee Development • Diversity and Inclusion • Occupational Health and Safety Performance • Auditing for compliance with Supplier Code of Conduct 	<ul style="list-style-type: none"> • Transparency and Board of Directors Activities / Independence • Business Conduct and Ethics • Enterprise Risk Management • Impact of Supply Chain





Sourcing and Supply Chain

Alongside Griffon's second quarter results on May 3, 2023, the company announced it would expand its global sourcing strategy to include its long handle tool, material handling, and wood storage and organization product lines made for and sold in the U.S. market.

By transitioning these product lines to an asset-light structure, CPP's operations will be better positioned to serve customers with a more flexible and cost-effective sourcing model that leverages supplier relationships around the world, while improving its competitive positioning in a post-pandemic marketplace. These supplier relationships will be governed by the company's Supplier Code of Conduct to ensure that the company's suppliers share Griffon's commitment to operating in a manner that sustains the environment and protects the health, safety, and well-being of its employees.

The global sourcing strategy expansion is expected to be complete by the end of calendar 2024. Over that period, CPP expects to reduce its U.S. facility footprint by approximately 1.2 million square feet, or 30%, and its headcount by approximately 600. The affected U.S. locations will include Camp Hill and Harrisburg, PA; Grantsville, MD; Fairfield, IA; and four wood mills.





Supplier Policy

Griffon believes a shared commitment to ethical conduct and integrity forms a solid foundation for trusted business relationships that create shared value.

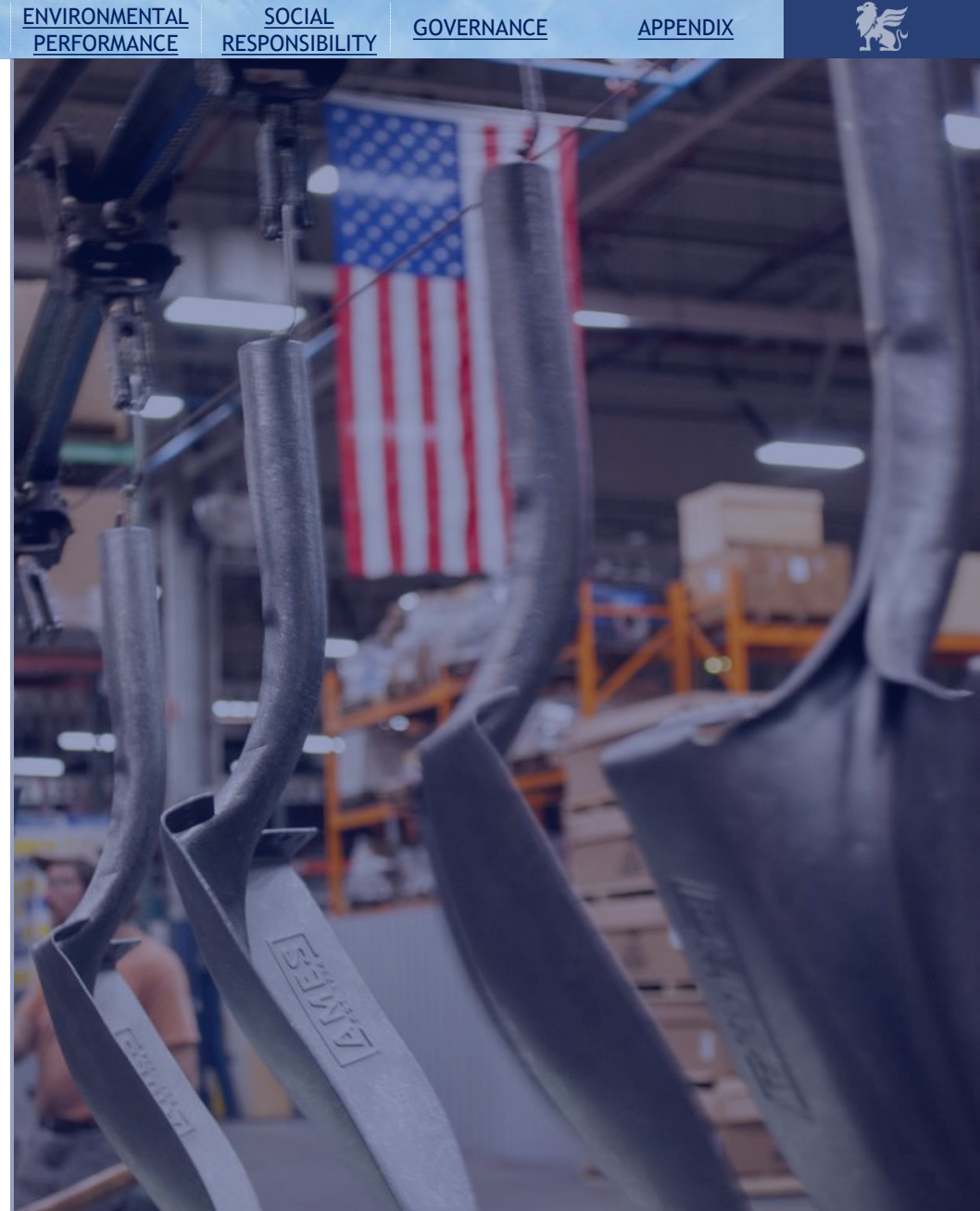
Griffon recently adopted a robust Supplier Code of Conduct to enlist our Supplier Partners in upholding the same guiding principles that we hold ourselves to, as outlined in our Code of Business Conduct & Ethics. These principles, focused on areas including human rights, environmental and safety performance, labor practices, anti-corruption, safeguarding company assets (including IT Security), privacy and economic inclusion, will be considered in the selection of all of our suppliers.

There are seven core principles outlined in our supplier policy:

1. Obey the Law
2. Conduct Business with Integrity
3. Keep Accurate and Honest Records
4. Honor Business Obligations
5. Treat People with Dignity and Respect
6. Protect Griffon's Information, Assets, and Interests
7. Be a Responsible Global Citizen

We aim to build trust-based relationships with ethical supplier partners and will work with them to address concerns as they arise.

The Supplier Code of Conduct will be implemented over a multi-year period, using a risk-based approach that will involve communication and training first with our larger international suppliers, followed by other international and domestic suppliers.



ENVIRONMENTAL PERFORMANCE





Environmental Priorities

We are focused on delivering environmentally sustainable products designed to help create a better planet for future generations. Each Griffon operating company has strong environmental programs and is subject to a broad range of environmental requirements.

Oversight

Each significant operating location is evaluated monthly and must calculate a score based on a combination of safety metrics and performance, as well as EHS site visits and progress against EHS goals. This score is then reported to the executive team alongside financial performance reports. We also perform an on-site review of environmental systems management every 18 months.

In addition, environmental performance is an important factor in operating company executives' performance reviews.

Compliance

During 2022, regulatory authority inspections of various Griffon operating company locations resulted in zero alleged violations of any environmental law or regulations worldwide, including air emissions, wastewater, waste, toxic substances or other environmental programs. As a result, Griffon paid zero penalties for environmental violations.

Each of our significant operating locations has dedicated professional EHS staff to monitor compliance, train employees, and administer effective environmental programs.





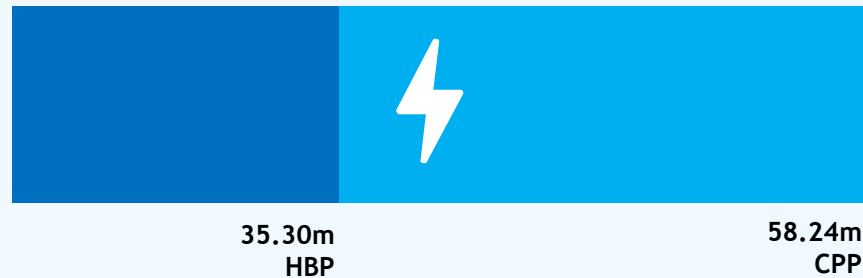
Energy Usage

Griffon operating companies have been committed to funding projects to reduce energy consumption over the last decade, at least. We remain focused on these efforts, and continuously work to save energy and reduce our carbon emissions. Griffon implements its strategy to reduce energy consumption by seeking opportunities for energy conservation and designing all new facilities and renovated spaces with energy consumption reduction in mind. We will continue to use the data collected to establish trends and set goals for reduction in the amount of energy consumed and in greenhouse gas emissions.

Electricity Consumed

2022

93.54m
kWh
Total



Natural Gas Consumed

2022

2.73m
therms
Total



As part of its ESG commitment to conserve resources and minimize adverse environmental impacts, Griffon is determining the proportion of supplied energy from renewable sources.

Percent Electricity from Renewable Sources

Consumer & Professional Products (CPP)	10.7%
Home & Building Products (HBP)	10.0%
Griffon*	10.5%



Emissions

Climate Change Risks

Griffon's Audit Committee is responsible for reviewing risks associated with climate change. The Griffon ESG Committee determines these risks on an annual basis. For Griffon, risks associated with climate change primarily consist of inland flooding and excessive heat. Management of these risks is discussed in subsequent sections of this report.

Carbon Emissions

No CPP or HBP facility is required to monitor, measure or report carbon (greenhouse gas) emissions, even in jurisdictions (United Kingdom, Canada, Australia) where such reporting requirements are in place because emissions levels fall well below regulatory thresholds. The carbon emissions levels below (in tons) are estimated from air emissions reporting and natural gas used on site (Scope 1) and electricity used from the grid (Scope 2).

Carbon Emissions (tons)

	Scope 1	Scope 2	Total
CPP	23,455	28,831	52,286
HBP	1,810	16,835	18,645
Total	25,256	42,666	70,931

Air Emissions

Many CPP and HBP manufacturing facilities have air emissions permits requiring the collection, and in some cases reporting, of air emissions data.

Air Emissions (tons)

	VOC	CO	NOX	SOX	CO2	Methane
CPP	77.619	6.25	7.42	0.131	1,568.07	0.078
HBP	16.178	0	0	0	0	0
Total	93.797	6.25	7.42	0.131	1,568.07	0.078

Note: HBP only captures VOC because CO, NOC, SOX, CO2 and Methane emissions were either insignificant or not tracked for HBP.

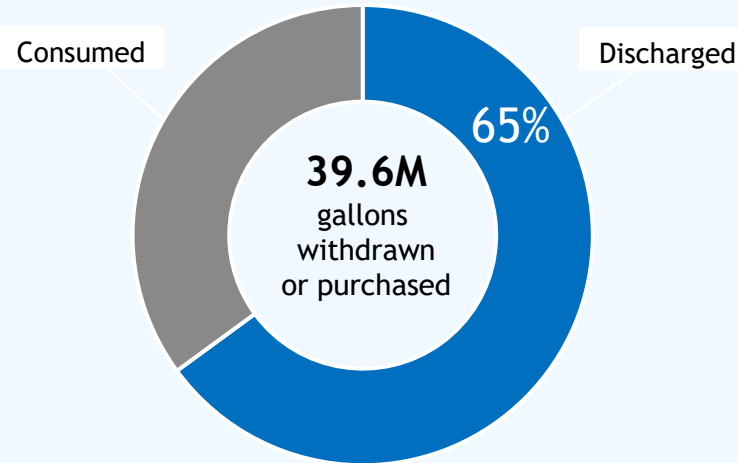
GOALS

Griffon will continue to quantitatively track carbon and air emissions, with the goal of a 30% reduction by 2030 from the 2022 baseline.



Water Consumption

Water Consumed as a Percentage of Water Withdrawn or Purchased



Of the approximately 39.6 million gallons of water Griffon withdrew or purchased in 2022, roughly 35%, or approximately 13.9 million gallons, was consumed.

- HBP consumed approximately 5% of the water it withdrew or purchased, while CPP consumed approximately 53%.
- CPP consumed more water than HBP, the vast majority of which was used for cooling.

While all Griffon locations are located in countries considered to be water scarcity areas, more than 90 percent of Griffon facilities are located in specific regions that are not experiencing drought conditions. The most significant exception is our Goodyear, Arizona facility, where extensive water conservation measures, including installation of a stormwater capture and reuse system, minimize water consumption to the degree practical. Griffon facilities generally use low volumes of water for production. Small volumes of water are consumed in the manufacturing process for cooling.

Our Commitment

Griffon recognizes the fundamental right of everyone to have clean water. Griffon is committed to evaluating the recycling and reuse of cooling water. Each significant operating location maintains a water balance calculation, tracking water usage, and the eventual disposition, and we will continue this practice as we evaluate other ways to reduce our consumption.

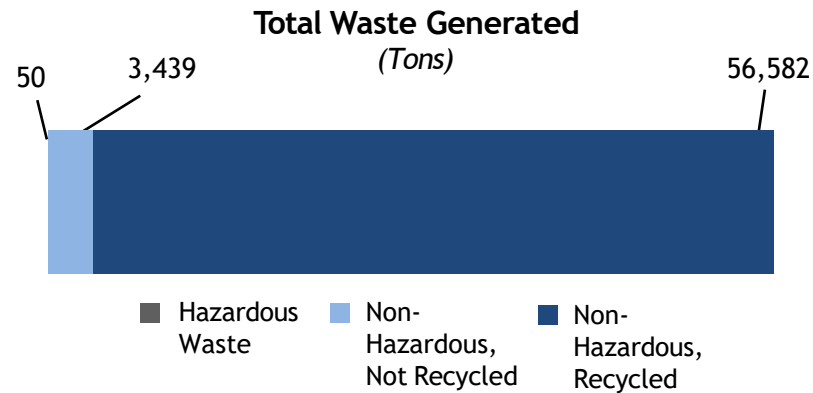
GOALS

Griffon will continue to quantitatively measure water consumed, with the goal of a 30% reduction by 2030 from the 2022 baseline.

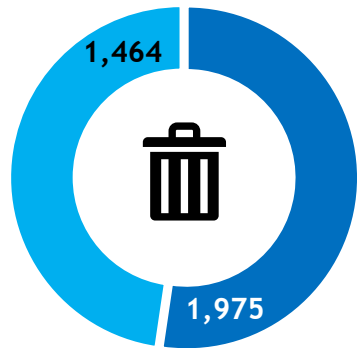


Waste Generation and Minimization

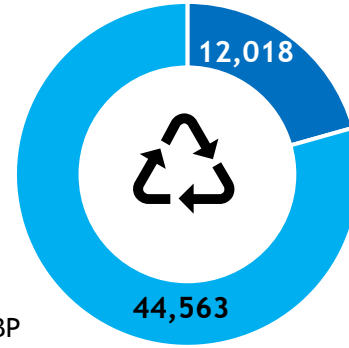
Our operations generate a small amount of total waste, which consists of both non-hazardous waste, ranging from discarded raw material packaging, office waste, cafeteria waste, and similar items, to discarded foam products, off-specification materials, and a small amount of hazardous waste.



Non-Hazardous Waste (Not Recycled) (Tons)



Non-Hazardous Waste (Recycled) (Tons)



Our Approach

Griffon's approach to Hazardous Waste Management is to minimize waste quantities, evaluate use of material inputs that do not result in hazardous waste generation, select permitted recycling or disposal facilities that offer techniques reducing impact on the environment, and intensively train our personnel regarding hazardous waste management.

Over the last decade, our operating companies have invested significant time and resources in finding non-hazardous substitutions, such as water-based coatings, and in reducing the use of solvents. The data we have collected indicates that while we generate a relatively small volume of hazardous waste, over 90% of that generation occurs at just four facilities. Therefore, we are focused on reducing hazardous waste generated by those facilities.

We have made concerted efforts over the last several years to encourage recycling, and these efforts have been successful as approximately 94% of the non-hazardous waste generated by Griffon is recycled.

GOALS

Griffon will continue to quantitatively track hazardous waste generated, with the goal of a 30% reduction by 2030 from the 2022 baseline.



Product Packaging

While converting packaging to recyclable materials is a valuable ESG objective, we place a strong focus on reducing the volume of packaging overall. Reducing/eliminating packaging is always our first choice. Where packaging is necessary, we aim to use recyclable materials whenever possible – implementing successful practices globally.

CPP

- The AMES Companies continue to reduce volume through a box-on-demand system that reduces packaging size
- ClosetMaid wire shelving systems are made from recycled steel as certified by SCS Global Services
- Our facilities in Australia participate in a voluntary program to reduce packaging volumes and to increase recyclable packaging and actual consumer recycling

HBP

- On average, Clopay metal garage doors use more than 50% post-consumer recycled materials
- Clopay sells its residential doors with minimal packaging

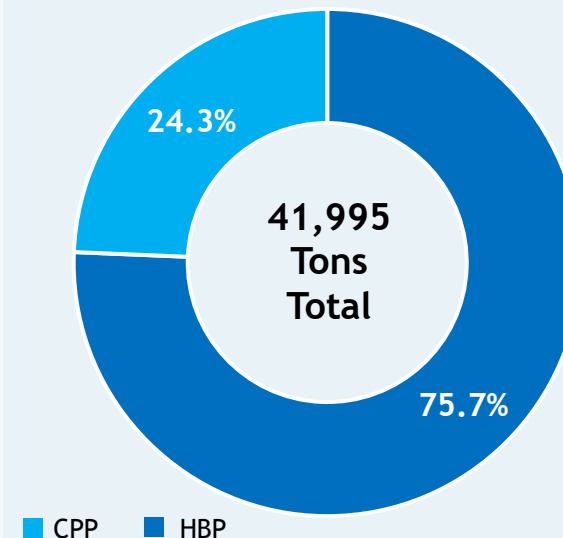
CPP Spotlight



Australasia

- Participant in the Australian Packaging Covenant Organization
- Continues to implement key projects like closed-loop packaging return, labeling to promote consumer recycling, and reviewing packaging to reduce volumes
- Committed to the following 2025 targets:
 - All packaging will be recyclable, reusable or compostable
 - 70% of all plastic packaging actually recycled
 - 50% average recycled content for all packaging

Packaging Shipped (Tons)



Percentage of Recyclable / Reclaimed Packaging Input

CPP	34%
HBP	50%
Griffon	40%

Percentage of Recyclable Packaging Materials Shipped

CPP	68%
HBP	96%
Griffon	78%

GOALS

We plan to set goals to further reduce the volume of packaging and increase recyclability.



Forestry

CPP Spotlight



AMES continues to be a member of the Appalachian Hardwood Manufacturers, Inc. (AHMI), which provides sustainable hardwoods for AMES tools, and is committed to purchasing hardwoods through the Sustainable Forestry Initiative (SFI). AHMI retained Auditech to independently audit AMES and has determined that its hardwoods are sustainable.

Additionally, AMES is committed to purchasing timber from vendors eligible for certification by the SFI. AMES uses approximately 50,000 metric tons of hardwoods in its tool production, of which 75% is purchased from sustainable sources.

AMES is committed to maintaining focus on sustainable forestry in all its wood mills. As a certain number of its wood mills close in the next 12-18 months and the company shifts its sourcing strategy, the company will continue to prioritize sustainable hardwoods for AMES tools.





Chemicals and Raw Materials

Chemical Usage Safety

Griffon companies are not large purchasers or users of chemicals. Our highest volume chemicals, the components of spray insulating materials, are reacted to form an inert compound and pose no risk to consumers. The next highest chemical volume consists of tiny percentages of lead and chromium in metals purchased to make our products. Griffon requires each operating company to assess and manage risks associated with chemicals in products sold and those used in the workplace.

Griffon has rigorous processes in place to find lower-risk alternatives to every chemical used. New chemicals must undergo an intensive review.

All Griffon products meet applicable volatile organic compound standards. Most coatings used to make Griffon products are water-based and contain little or no volatile organic compounds.

Raw Materials

While Griffon focuses on recyclability and the life cycle of its products, we also consider whether the raw materials we use in production can be purchased as recycled materials.

Percentage of Key Materials (Steel and Wood) Input Recycled or Reclaimed	
CPP	32%
HBP	75%
Griffon	47%

SOCIAL RESPONSIBILITY





Health and Safety Overview

The health, safety, and well-being of our employees is a cornerstone of our culture.

We encourage a high standard of safety in the workplace, and it is critically important that every worker go home safely at the end of their workday. We expect our suppliers to conform to the same standards.

Our global health and safety management system is grounded in the U.S. Environmental Protection Agency (EPA) and Occupational Safety and Health Administration (OSHA) requirements and incorporates protocols from other global regions. Each of our facilities has an established procedure for including employees in health and safety decisions, and for providing suggestions for safety improvement. The company provides extensive health and safety training to its employees and evaluates the effectiveness of each training program during our internal health and safety reviews.

Occupational Safety and Health

Griffon uses a comprehensive, integrated operating discipline management system that includes policies, requirements, processes, best practices, and procedures related to our Environment, Health and Safety standards and related external standards.

We are committed to not only comply with but, through continuous improvement programs, strive to exceed applicable environmental and employee health and safety standards by:

- Ensuring a safe work environment for all employees
- Eliminating or minimizing the generation of hazardous and other wastes
- Conserving energy, water, and raw materials

We expect each operating company to implement, and use health and safety programs that:

Identify, assess, and eliminate or mitigate hazards

Prevent unsafe acts and conditions

Maintain and improve the health of personnel

Foster communication on health and safety issues



Health and Safety

Risk Assessment and Reporting

Hazard identification, risk assessment, and incident investigation

We employ leading occupational health and safety performance indicators to prevent injury and strengthen other safety and health outcomes. We then complement these global practices with locally defined leading indicators to ensure each of our facilities is safeguarding the health and safety of our people.

Globally applied leading indicators include:

- Non-injury (near-miss) situations with the potential to cause a life-altering impact or fatality had the situation been only slightly different (non-injury pLIFE event)
- Percent completion of training
- Internal EH&S Review results
- Change management

Reporting and Investigating Safety Issues

Workers have a direct line of sight to potential hazards. They are expected, and encouraged, to identify, report, and intervene when unsafe or unhealthy work conditions are observed. Our people are also encouraged to celebrate and positively recognize their coworkers who make safe choices.

Worker input on hazards and solutions is part of local near-miss programs and leveraged when appropriate. We have a Griffon-wide Ethics Compliance hotline. Retaliation against anyone who raises or reports concerns about workplace safety is prohibited under the Griffon Code of Ethics and Business Conduct.

Root Cause Investigation methodology is used for all recordable injuries and near-miss situations in which potential existed for a life-impacting injury. This approach ensures we understand the root cause of any incident and are able to take corrective actions.

Once hazards are identified, we determine feasible and effective solutions. The management system update requires the implementation of world-class controls to prevent accidents related to heavy equipment and reversing moving vehicles.



Health and Safety

By the Numbers

Our goal is to provide a zero-harm workplace that prevents injuries, and promotes healthy lifestyles and respect for the environment. We train our employees to ensure they have the awareness, skills, and knowledge to carry out this policy.

In 2022, we had 0 deaths and 9 reportable OSHA injuries. For reference, we have established a goal based on averages from comparable SIC/NAICs codes.

Our Approach

Currently, occupational safety and health performance at each significant operating location are benchmarked to averages established by the United States Bureau of Labor Statistics (BLS) every month.

	Lost Time Injuries	Lost Time Injury Rate	Lost Time Goal	Recordable Injuries	Recordable Injury Rate	Recordable Injury Goal
CPP	46	1.93	0.90	128	5.37	3.2
HBP	11	0.48	0.90	60	2.59	3.1
Griffon	57	1.42	0.90	188	4.40	3.2

Our Commitment

We continued to measure these key metrics in 2022 and check them against our goals. We will track these metrics and aim to continue to improve our safety performance each year going forward.



Health and Safety

By the Numbers

HBP Spotlight

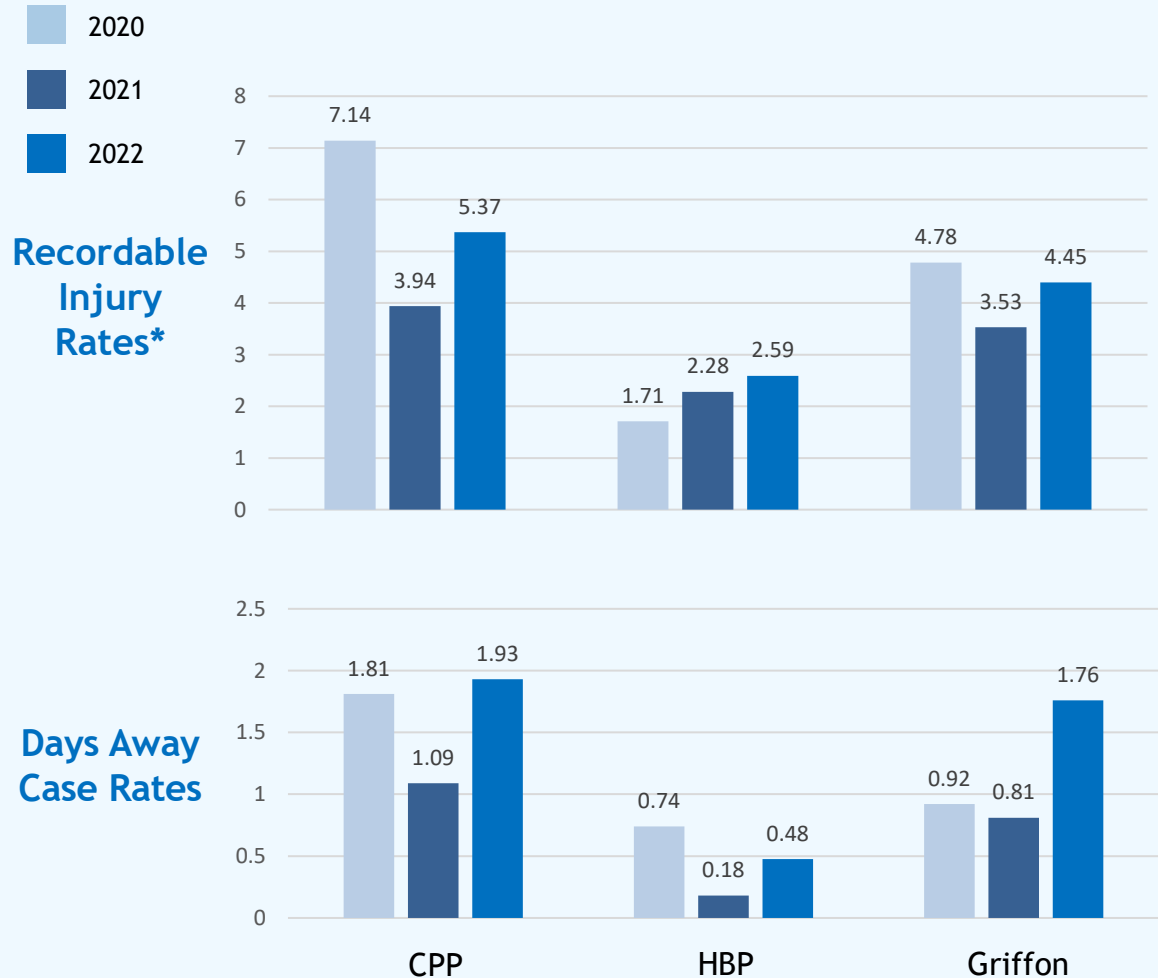


- In the Goodyear, AZ facility, a coil racking project replaced wire decking, allowing for more even weight distribution and improved ability to maintain structural integrity
- This facility has also added Haas machining, allowing for the transfer of numerous parts from a difficult-to-guard lathe to an enclosed machining center
- Glass and door lift assist systems have been installed in the Russia, OH plant to reduce manual lifting
- Fall protection above powder coat lines has been added in two rolling steel manufacturing plants
- Installed guarding of coil payoffs in the Troy, OH plant

GOALS

Griffon will quantitatively track lost time and total recordable injuries with a target 30% reduction from the 2022 baseline by 2030.

We continue to invest in systems and training of our people, especially management, to prevent injuries and illnesses



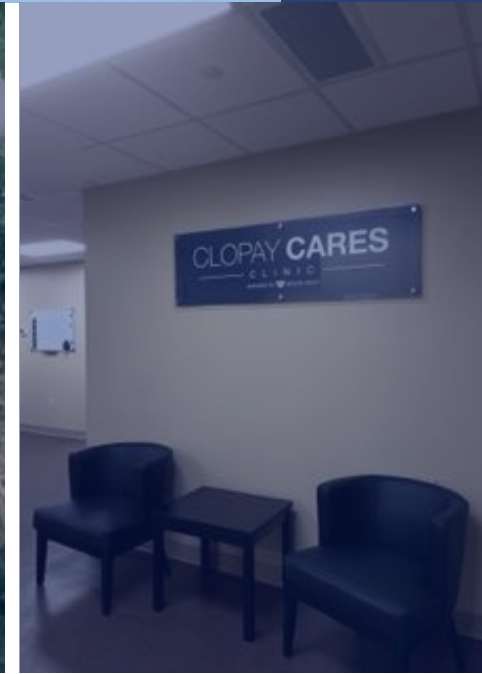
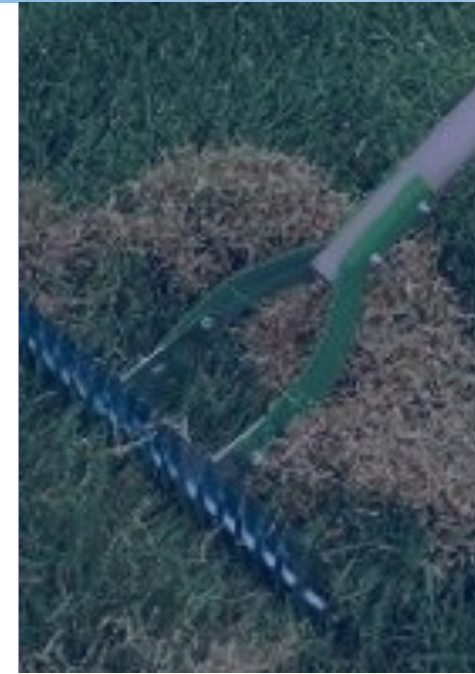


Employee Welfare

Continuing to enhance employee wellness and welfare

Employee safety, health, and wellness continue to be a priority for Griffon across its operating segments. In 2022, the company implemented several facility and program updates, including:

- Expanding the Clopay Cares clinic at the Troy facility with multiple exam rooms and a small pharmacy where employees can access urgent care, medications, annual physicals, and a range of occupational medicine
- Creating ergonomic packing stations in our fulfillment centers with adjustable height for the operator, ergo mats, and improved location to produce less lift and carry of product
- Enhancing vending service and seating/eating areas in state-of-the-art employee breakrooms
- Clopay is adding a free program through Sword Health that provides access to physical therapy for employees and family members. Sessions can be accessed from home, better enabling those who can't travel to a physical therapy facility
- Upgrading lactation rooms in all Griffon facilities
- AMES offers a range of additional benefits outside standard offerings, such as
 - Free telemedicine services for all team members, including mental counseling
 - Free assistance and support to employees and family members serving as caregivers through Cariloop
 - Identity theft and pet insurance
 - Corporate membership at the Lake Nona Performance Center





Employee Development

At Griffon, we understand that our growth and success is entirely dependent on the growth and success of our employees. To this end, each operating company prioritizes employee education and advancement, and has specific practices and initiatives focused on leadership skill development.

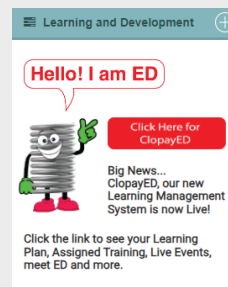
Learning & Development

We strive to create a collaborative, resilient, and skilled workforce and view learning and development as central to the success of our organization.

We are committed to helping employees across our operating segments expand their knowledge and relevant technical competencies. We believe this helps to strengthen our organizational capacity and respond to change with agility and flexibility.

Did You Know?

Clopay launched a learning management system called ClopayED. This is being used to improve the skills of all associates and to make it easier to take advantage of development opportunities.



Leadership

Our goal is not only to help our people thrive in their current positions, but also to prepare them for their next roles with increased levels of responsibility. Our talent development programs increase employee engagement and foster important leadership skills at all levels of the organization. We are also committed to providing training and learning experiences to new and current managers to best enable them to support their teams and raise overall professional awareness.



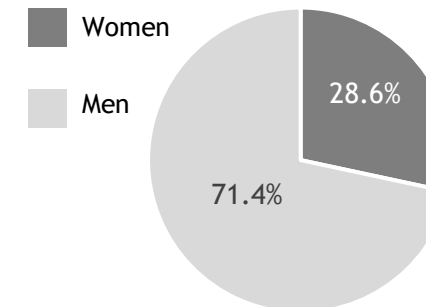
Diversity and Inclusion

At Griffon, we are committed to a globally inclusive workplace. We recognize that a diverse, engaged workforce is important to achieve success and create shareholder and community value.

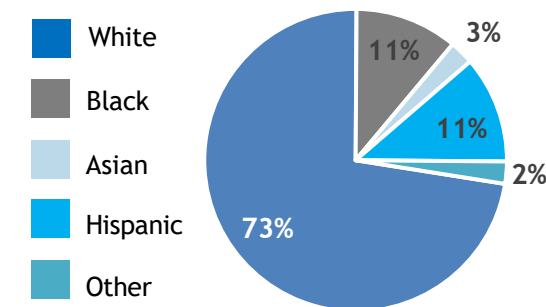
The charts below illustrate how Griffon's diversity compares to other manufacturers¹

Our Workforce at a Glance²

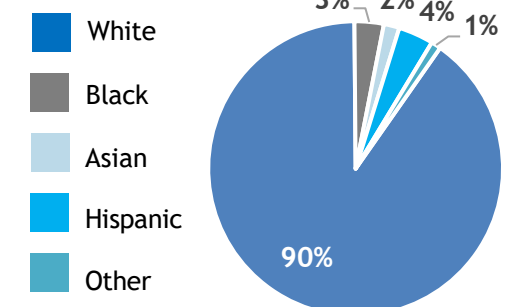
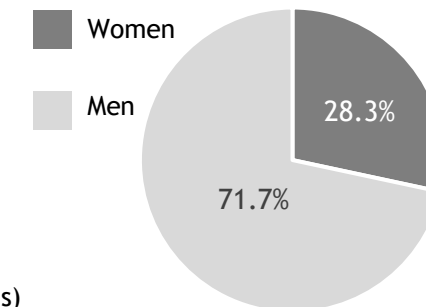
Gender Diversity



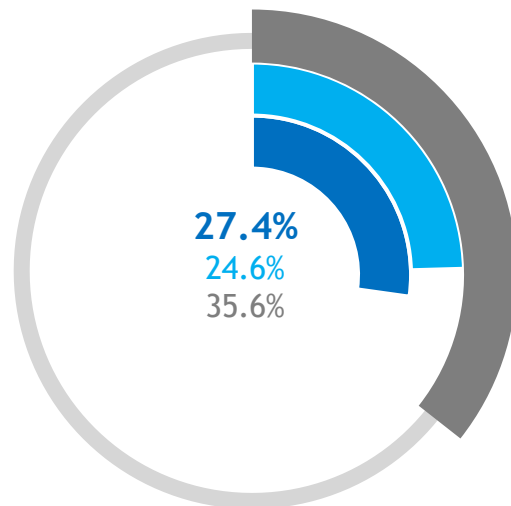
Racial/Ethnic Diversity



First/Mid Officials, Managers



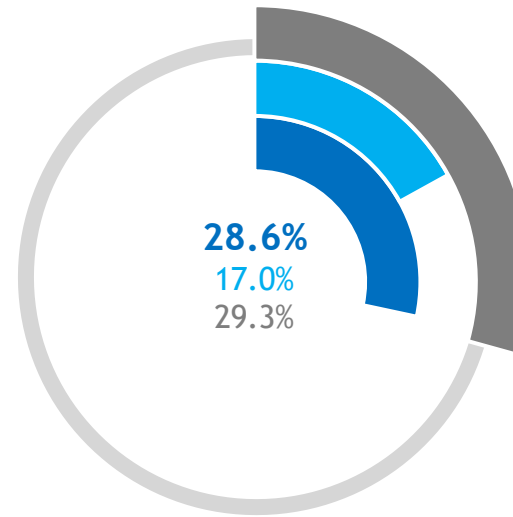
Racial and Ethnic Diversity



Griffon FY2022

Industry Peers
(U.S. Bureau of Labor Statistics)

Gender Diversity



Manufacturing Industry
(U.S. Bureau of Labor Statistics)



Diversity and Inclusion



Diversity Training and Practices

We aim to attract a qualified workforce through an inclusive, accessible recruiting process that utilizes online recruiting platforms, campus outreach, internships, and job fairs to manage human capital resources.

Griffon and its businesses strictly comply with all applicable local, state, federal, and international laws governing nondiscrimination in employment in every location where Griffon and its businesses operate.

This applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training. All applicants and employees are treated with the same high level of respect regardless of their gender, ethnicity, religion, national origin, age, marital status, political affiliation, sexual orientation, gender identity, disability, or protected veteran status.

Commitment to Worker and Human Rights

Griffon's ESG Policy and Supplier Code of Conduct each contain commitments to worker and human rights. This includes all internationally recognized human rights, including women's rights, indigenous peoples' rights, the right to clean water, freedom of association, collective bargaining and more. We prohibit the use of child labor and forced labor both within the company and at our suppliers. We comply with applicable laws regarding working hours. Griffon's private security forces, which are generally in the nature of unarmed guard services, also recognize these rights, as do our suppliers.



Compensation and Benefits

At Griffon, our employees are our greatest asset. We strive to provide each of them with an individualized, comprehensive benefits package to promote physical, mental, and financial well-being.

Our benefits philosophy is simple: **CHOICE**. We provide our employees with a variety of benefits and enrollment options to fit their unique needs and well-being. The Company seeks to retain employees by offering competitive wages, benefits, and training opportunities, all while promoting a safe and healthy workplace. And our efforts are successful, with turnover across our operating companies on par with or below industry averages.

Among the programs offered to our employees:

- Broad set of insurance offerings:
 - Medical
 - Dental
 - Vision
 - Group life
 - Disability, Accidental Death and Dismemberment
- 401(k) savings plan with employer matching
- Telemedicine and caregiver support services
- Generous paid time off
- Onboarding programs
- On-site job training programs
- Leadership development programs
- Tuition reimbursement and education assistance policies to further the development and advancement of our employees

Did You Know?

In addition to these listed benefits, we have maintained an Employee Stock Ownership Plan (ESOP) for decades. Through our ESOP, U.S. employees own approximately 9% of Griffon stock. Under this plan, shares of Griffon stock are allocated each year to accounts for almost all of Griffon's U.S. employees - at no cost to the employees. We are one of few U.S. public companies with an ESOP that does not require employee contributions.

LABOR RELATIONS

In 2022, approximately 3.7% of CPP employees were covered by collective bargaining agreements in the U.S. Additionally, approximately 200 employees in Canada were represented by the Trade Union Advisory Committee. We respect union rights and the right to collectively bargain and expect the same of our suppliers.



Community Relations and Charitable Giving

For decades, our operating companies have been integral to the local communities in which they operate. We have established strong partnerships and relationships and are involved in more than 100 charitable and community organizations.

CPP Spotlight

Hunter

As part of the Hunter Gives Back community support initiative, the Hunter team has partnered with the Memphis-Based organization The Dorothy Day House, which provides temporary housing and support services for homeless families in the Memphis, TN area.

At Hunter, we understand the importance of a comfortable home where we can be with our families, and we are proud to work with The Dorothy Day House to help provide safe, temporary housing and support services for families to help keep them together.

Since 2020, we have had a special connection to The Dorothy Day House, including helping to turn the organization's third house – Joseph's House – into a space its residents would be proud to call home by providing comfortable furnishings, lighting, Hunter ceiling fans and other finishing touches.

That was just the beginning of this Huntervention – we continue to donate a portion of our sales each December to The Dorothy Day House to help keep homeless families together.





Community Relations and Charitable Giving

HBP Spotlight



Caring and Protecting Our Local Communities

Clipay continues to contribute to the communities in which it operates in ways both big and small that make a real impact – from collections for regional food banks and “Valentines for the VA” to highway cleanups and back-to-school supply drives.

Clipay also reduced a potential environmental liability by removing a 12,000 gallon diesel storage tank from the Troy, OH facility, and installed trash compactors to reduce potential environmental contaminants from open-top dumpsters.

Did You Know?



Together, The AMES Companies and Hunter Fan donated tens of thousands of dollars to The Lowe's Foundation in 2022 to support our communities. Hunter's contributions were directed to the foundation's educational fund to help build and support the next generation of skilled trade workers.



GOVERNANCE





Key Governance Characteristics

We strive to ensure that our corporate governance reflects best practices tailored, as necessary, to support our culture, goals, and growth strategy.

Key corporate governance characteristics of our company include:

- Independent Lead Director
- Stock Ownership Guidelines for Directors and Executives
- Executive Sessions of Independent Directors
- Independent Compensation Consultant
- Annual Board and Board Committee Self Evaluations
- Code of Business Conduct and Ethics
- Annual Stock Grant to Non-Employee Directors
- Ethics Hotline, with Anonymous Reporting
- Related Party Transaction Policy
- Disclosure Committee for Financial Reporting
- Executive Compensation Proposed for Approval to Shareholders Annually
- Annual Shareholder Outreach to Solicit Input on Executive Compensation and Corporate Governance Matters

EXECUTIVE SESSIONS

Executive sessions are an important feature of our Board to ensure transparency and independence. Independent directors meet in executive sessions without management present, as needed. Such executive sessions are generally chaired by the Independent Lead Director, Mr. Jerome L. Coben. The Audit Committee and Compensation Committee also meet regularly in executive sessions. During executive sessions, the independent directors may review CEO performance and compensation; succession planning, strategy, and risk; corporate governance matters; and any other matters of importance to the Company raised during a meeting or otherwise presented by the independent directors.



Board of Directors

Our directors have a diverse mix of backgrounds, qualifications, skills, and experience that we believe contribute to a well-rounded Board positioned to effectively oversee our strategy.

Our Board of Directors maintains a leadership structure composed of a Independent Lead director and our Chief Executive Officer, Ron Kramer, who also serves as Chairman of the Board. Our Independent Lead director is selected by the independent Board directors and plays an active oversight role.

Our Board is currently comprised of 13 highly skilled and qualified members. 92% of our Board is independent.

Our highly engaged, committed Board of Directors has the skills and expertise necessary to continue to enhance oversight, support growth, deliver shareholder returns, and advance our ESG objectives.

We recognize that strong corporate governance contributes to long-term shareholder value. More information about Griffon's Board Members can be found on our website at www.griffon.com.

Director Tenure*

4 Years

Median Term

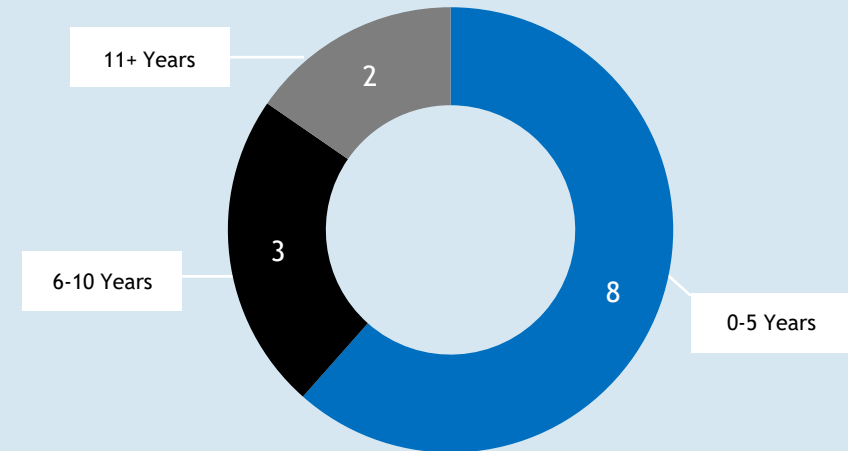
Director Independence*

13

Total Number
of Directors

92%

of our Directors
are Independent





Board of Directors

Board Refreshment

Since 2018, we have refreshed eight directors, adding relevant expertise and diversity to our Board.

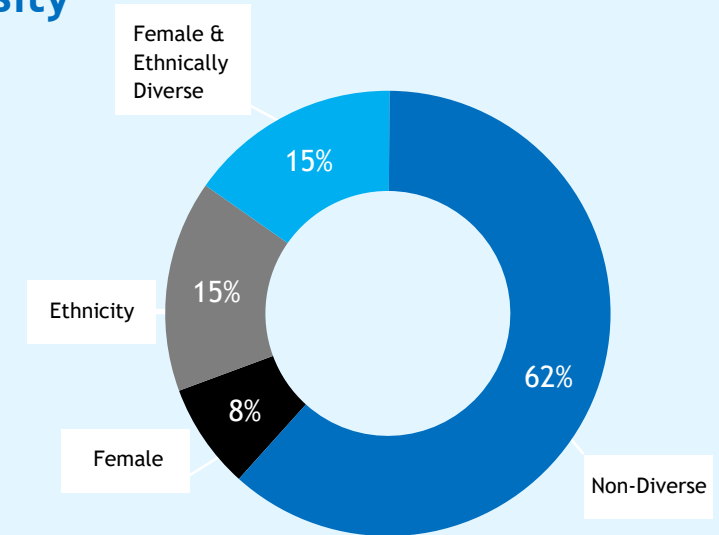
Michelle Taylor and H.C. Charles Diao joined our Board effective upon the conclusion of our 2022 Annual Meeting of Shareholders on February 17, 2022. Travis W. Cocke was appointed to the Board of Directors on January 9, 2023, to fill the vacancy left by the late Admiral Robert G. Harrison. Our new directors bring unique perspectives and skills to our Board and further enhance our diversity.

Our commitment to enhancing the diversity of our Board aligns with [Nasdaq's](#) definition of “diverse,” which includes those who self-identify as female, an Underrepresented Minority, or LGBTQ+.

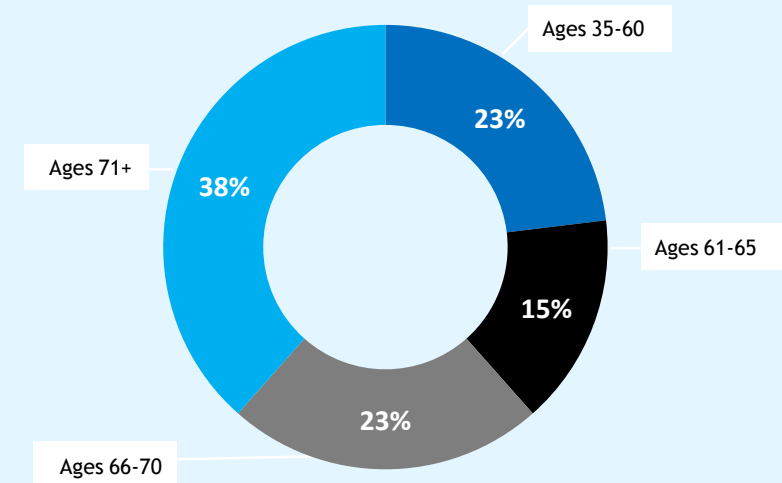
GOAL

We have committed to further diversify our Board with an objective that, by 2025, at least 40% of our independent directors will be women or persons of color.

Director Diversity*



Director Age*





Board Committee Structure and Responsibilities

Our Board Committees hold meetings to discuss subjects within their areas of responsibility.

We currently have the following standing committees: Audit, Compensation, Finance, and Nominating and Corporate Governance. All the standing committees of the Board of Directors are composed entirely of independent directors.

Key Responsibilities

Audit

- Discuss financial reporting and internal accounting controls with management and our independent registered public accounting firm.
- Exercise sole authority and responsibility to select, evaluate, and replace our independent registered public accounting firm.
- Oversight of Internal Audit function
- Pre-approve all audit engagement fees and terms.
- Oversee compliance with our Code of Business Conduct and Ethics.
- Monitor ESG performance and reporting.

Compensation

- Determine and approve the compensation of our Chief Executive Officer.
- Review and approve all elements of compensation for our executive officers, as well as for the Presidents of our business units.
 - Beginning with Fiscal 2023, ESG is included as a bonus performance metric for our named executive officers
- Award restricted stock and other equity-based awards to officers and certain key employees.

Finance

- Review proposed transactions that will materially impact the Company's capital structure, as well as any material changes to the Company's capital structure, after which it shall make a non-binding recommendation to the full Board of Directors. This includes any offerings or sales of debt or equity securities of the Company, and material credit agreements or other material financing arrangements.

Nominating and Corporate Governance

- Identify individuals qualified to become Board members, and recommend the director nominees for each annual meeting of stockholders.
- Review suggestions of candidates for director.
- Recommend director nominees for each committee of the Board.
- Recommend any changes to Griffon's corporate governance guidelines.
- Oversee the annual evaluation of the Board and management.



Ethics and Conduct

Our Board of Directors has adopted a [Code of Business Conduct and Ethics](#) (Code) applicable to all employees in performing their duties. The Code sets forth information and procedures for employees to report ethical or accounting concerns, misconduct, or violations of the Code in a confidential manner.

Honesty, transparency, and ethical practices have been ordinary course at Griffon for decades, and we continue to review and upgrade our programs in these areas. Our Code, to which every employee certifies annually, requires that each and every employee conduct business to the highest ethical standards.

The Code is wide-ranging in scope. It covers not only legal requirements, such as insider trading, lobbying, anti-corruption, and import/export requirements, but also creates expectations of respect and concern for others, and addresses conflicts of interest, acceptance of gratuities and business courtesies, use of company resources, and procurement integrity. It also sets forth information and procedures for employees to report ethical or accounting concerns, misconduct, or violations of the Code in a confidential manner.

If at any time employees have questions about the Code, they have been instructed to contact their supervisor, their local Human Resources representative, their Ethics Liaison Officer, or Griffon's Ethics Officer.

Griffon maintains an ethics hotline, with anonymous reporting, for its employees, suppliers, and others to use. Each reported ethics concern is investigated, with documented findings. Griffon promotes and maintains a corporate environment that encourages the disclosure of concerns and reports of violations, including maintaining this hotline and investigating any information submitted by employees.

The Board has also adopted [Corporate Governance Guidelines](#), as required by the New York Stock Exchange rules, to assist the Board in exercising its responsibilities to Griffon and its stockholders.

Ethical business is good business. Integrity is central to our identity.



Griffon Corporation is committed to maintaining the highest standards of conduct. Ethical behavior is morally right and legally required, and requires your personal commitment, the same kind of commitment that we believe you and your fellow employees expect for themselves and the Company from others.

The good name and reputation of Griffon and its businesses are fundamental to our continued success. Each one of us has a personal responsibility to ensure that this reputation remains unblemished by conducting our business in an honest and ethical manner in compliance with all applicable laws and regulations.

The *Code of Business Conduct and Ethics* cannot address every situation our personnel may encounter, nor is it a strict list of do's and don'ts. Rather, it is a basis for you to make sound moral and ethical judgments in business dealings. Other Company policies, practices and procedures, as well as sound common sense, also apply.

Attendance at periodic training on matters related to the *Code* will be required, and may be accomplished through live sessions or through an electronic, online portal. At the conclusion of these sessions, you will be required to certify in writing or electronically that you have reviewed the *Code* and that you have attended the training session. A copy of these certifications will be retained by human resources.

As a company, we are committed to the *Code*, and we require our personnel to adhere to it. Accordingly, we urge you to report suspected violations of the *Code* to your Ethics Liaison Officer, your supervisor or any of the officers responsible for your division. If you wish to report suspected violations anonymously, or if you feel that reports of suspected violations have been ineffective, we urge you to use the Ethics Compliance Line reporting process.

If at any time you have questions about the *Code*, contact your supervisor, your local Human Resources representative, your Ethics Liaison Officer, or Griffon's Ethics Officer.

Remember, ethical behavior is good businesses.



Risk Management

Risk Oversight

Management is responsible for the day-to-day management of risks for Griffon and its subsidiaries, while our Board of Directors, as a whole and through its committees, is responsible for the oversight of risk management. The Board sets the overall risk appetite and risk management strategy of the Company, and ensures the implementation of our risk management framework.

Managing Climate Change Risks

Griffon's climate change strategy is to manage risk through a combination of loss prevention practices and insurance. For example, Griffon maintains insurance against flood losses based on property values and business interruption so that flooding will not result in a material financial loss. In addition, Griffon has assessed its facilities for the likelihood of flooding and concluded that only one U.S. facility and one Australian facility operate in designated flood zones. Each of these facilities has an extensive flood management plan, equipment, and supplies to minimize the likelihood of flood waters breaching the facility or impacting operations. Griffon has also considered the risk of excessive heat, which could result in employees suffering from heat stress. Griffon has purchased cooling equipment to minimize the likelihood of heat stress, and trained supervisory personnel to recognize heat stress symptoms and remove affected employees when appropriate. Griffon also maintains workers compensation insurance to minimize financial loss resulting from employee workplace injuries or sicknesses.

Griffon has established and maintains a risk management strategy. This approach has created a culture that broadly considers risk in all significant decisions, creating dedicated risk prevention strategies for areas of vulnerability, and manages risk that cannot be prevented or shifted. Some specific areas of risk management include:

Identifying risk

Griffon identified a wide variety of risks in establishing its crisis management program. These include natural disasters, pandemics, health and security risks to travelers, physical security, and workplace violence. In addition, we identify and prioritize environmental, health, and safety risks.

Managing risk

Griffon has established comprehensive procedures for crisis notification and communication. We have established a crisis management policy instructing operating company site locations on how to respond to various scenarios. Our environmental, health, and safety management systems take the risks prioritized through the identification process and implement control systems and company standards to minimize or eliminate those risks.

Use of partners

Griffon partners with risk control professionals such as brokers, insurers, and consultants to focus capital resources and safety programs on mitigating identified risks.

Shifting risk

Where risks cannot be eliminated or minimized to immaterial levels, Griffon looks to shift or share risk through contractual risk transfer and insurance. When risks cannot feasibly be indemnified, Griffon creates financial reserves to address them.



Supply Chain Risk Management

As a global company, Griffon understands the need to communicate and transmit our core values to our suppliers. In addition to participating in the Responsible Minerals Initiative, we continue to evolve our business practices to support responsible sourcing and supply chain practices more broadly - recently updating our [Supplier Code of Conduct](#) that is applicable worldwide to all Griffon companies. We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

The Supplier Code of Conduct enlists our Supplier Partners in upholding important ethical principles:

1. Obey the law
2. Conduct business with integrity
3. Keep accurate and honest records
4. Honor business obligations
5. Treat people with dignity and respect
6. Protect Griffon's information, assets, and interests
7. Be a responsible global citizen

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 suppliers. To that end, we have a [Supplier Application](#) on our website that includes a commitment to compliance with our Supplier Code of Conduct.

APPENDIX





Appendix A: Griffon Corporation ESG Policy

Griffon will be a global leader in considering and implementing environmental, social, and governance (ESG) principles.

We will collect metrics measuring our progress, set goals, and periodically report on our progress in meeting those goals. This is consistent with Griffon's business interests and Code of Business Conduct and Ethics. We will ensure that our business partners share the same goals by applying this policy through our Supplier Code of Conduct (the Code). We will audit our priority suppliers for compliance with the Code.

Specifically, we commit to the following:

Sustainability: We will strive to conserve natural resources and minimize or eliminate adverse Environmental Health and Safety (EHS) aspects and hazards associated with our products, services, and operations, focusing on creating value for internal and external stakeholders.

Employees: Our goal is to provide a zero-harm workplace that prevents injuries and illnesses, and promotes health and respect for the environment. We will ensure, through training, that our employees have the awareness, skills, and knowledge to carry out this policy. We recognize the value of diversity and inclusion, and will strive to consider diversity and inclusion in our hiring and advancement decisions.

Compliance: We meet all applicable laws and Griffon requirements for ESG.

Human Rights, Human Trafficking, and Economic Inclusion: We will never use or tolerate the use of human trafficking, forced labor, or child labor, as defined by the International Labour Organization (ILO), and will require the same performance from our suppliers. Griffon supply chain personnel will be trained in these areas. Griffon recognizes the right of free, prior and informed consent, and expects its suppliers to recognize this right.

Business Integration We will integrate ESG considerations into our business activities. Our Board of Directors has implemented a program to consider ESG performance in the compensation of our top officers.

Customers: We will work with our customers to help them address their ESG needs.

Suppliers and Contractors: Our suppliers will be expected to meet the same standards for ESG through Griffon's Supplier Code of Conduct.

Community and Government: We will participate in community and government ESG initiatives. Our ESG program will also include charitable giving of dollars and time to improve our communities.

Continuous Improvement

We commit to continuous improvement in Griffon and supplier ESG performance.

Governance

Griffon will consider ESG principles in its Board of Directors composition and functions, Code of Business Conduct and Ethics, and risk evaluation.

United Nations Global Compact Sustainable Development Goals
We are a signatory to the United Nations Global Compact. We will consider the 17 Sustainable Development Goals as a part of our company's strategy, culture, and day-to-day operations. The Sustainable Development Goals are:

[GOAL 1: No Poverty](#)

[GOAL 2: Zero Hunger](#)

[GOAL 3: Good Health and Well-being](#)

[GOAL 4: Quality Education](#)

[GOAL 5: Gender Equality](#)

[GOAL 6: Clean Water and Sanitation](#)

[GOAL 7: Affordable and Clean Energy](#)

[GOAL 8: Decent Work and Economic Growth](#)

[GOAL 9: Industry, Innovation and Infrastructure](#)

[GOAL 10: Reduced Inequality](#)

[GOAL 11: Sustainable Cities and Communities](#)

[GOAL 12: Responsible Consumption and Production](#)

[GOAL 13: Climate Action](#)

[GOAL 14: Life Below Water](#)

[GOAL 15: Life on Land](#)

[GOAL 16: Peace, Justice and Strong Institutions](#)

[GOAL 17: Partnerships to Achieve the Goals](#)

Griffon's ESG program oversight will be provided by the ESG Management Committee, consisting of the Griffon Chief Operating Officer, Chief Financial Officer, General Counsel and VP, Corporate Strategy and Development and the Presidents of our two operating segments. The ESG Management Committee will report to the Board of Directors, who will be responsible for the Griffon ESG Program.

Compliance with this policy is the responsibility of every employee.



Appendix B: Griffon Corporation 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.



Appendix B (cont.)

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.

2. 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.

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.



Appendix C: SASB Sustainability Disclosure Topics & Accounting Metrics






















Building Products and Furnishings

Topic	Accounting Metric	Code	Data	Reference
Energy Management in Manufacturing	(1) Total energy consumed (2) Percentage renewable	CG-BF-130a.1	2.78 million GJ or 77 million kWh. Ten percent renewable	Energy
Management of Chemicals in Products	Discussion of processes to assess and manage risks and/or hazards associated with chemicals in products	CG-BF-250a.1	Griffon uses very low volumes of chemicals and manages risk	Environmental Priorities, Chemicals and Raw Materials
	Percentage of eligible products meeting volatile organic compound (VOC) emissions and content standards	CG-BF-250a.2	100 Percent	There are no VOC content standards applicable to Griffon products
Product Lifestyle Environmental Impacts	Description of efforts to manage product lifestyle impacts and meet demand for sustainable products	CG-BF-410a.1	Griffon has focused on use of sustainable or recycled materials in its key raw materials, steel and wood	Forestry, Chemicals and Raw Materials
	(1) Weight of end of life material recovered (2) Percentage of recovered materials recycled	CG-BF-410a.2	There are no established programs for product recovery. Focus is on non-hazardous waste. Approximately 90 percent of non-hazardous waste is recycled or reused	Waste Generation and Minimization
Wood Supply Chain Management	(1) Total weight of wood fiber materials purchased (2) Percentage from third-party certified forest lands (3) Percentage by standard (4) Percentage certified to other wood fiber standards (5) Percentage by standard	CG-BF-430a.1	Approximately 50,000 metric tons purchased for tools. Percent from sustainable sources: 75 percent	Forestry












Appendix D: United Nations Global Compact Sustainable Development Goals

The table below indicates where information that corresponds to the UN Global Compact's Sustainable Development Goals can be found in Griffon's calendar year 2022 ESG Report. Our commitment to these goals is also outlined in our ESG Policy, found in Appendix A, and our Supplier Code of Conduct, found in Appendix B, to this report.

2022 ESG Report	UN Goals	2022 ESG Report	UN Goals	2022 ESG Report	UN Goals	2022 ESG Report	UN Goals
Employee Welfare	 No Poverty  Good Health and Well-being  Decent Work and Economic Growth	Diversity and Inclusion	 Gender Equality  Reduced Inequalities	Energy Efficiency	 Affordable and Clean Energy  Climate Action	ESG Goals	 Peace Justice and Strong Institutions  Partnerships for the Goals
Community Relations and Charitable Giving	 Zero Hunger  Good Health and Well-being  Sustainable Cities and Communities	Water Consumption	 Clean Water and Sanitation  Life Below Water	Waste Generation and Minimization	 Responsible Production and Consumption  Life on Land	Chemicals and Raw Materials	 Responsible Production and Consumption
Employee Development	 Quality Education	Health and Safety	 Decent Work and Economic Growth	Environmental Priorities	 Sustainable Cities and Communities	ESG Priorities	 Industry, Innovation and Infrastructure



Links to Supporting Materials

-  [Annual Report](#)
-  [ESG Policy](#)
-  [Supplier Code of Conduct](#) and [Supplier Application](#)
-  [Code of Business Conduct & Ethics \(English\)](#)
-  [Code of Business Conduct & Ethics \(Multi-language\)](#)
-  [Proxy Statement](#)
-  [Corporate Governance Guidelines](#)
-  [Board Committee Charters](#)
-  [Conflict Minerals Policy](#)