



LOWE'S VENDOR CODE OF CONDUCT

This Vendor Code of Conduct ("Code of Conduct") applies to all vendors ("Vendors") who provide services and goods to Lowe's Companies, Inc. or any of its subsidiaries ("Lowe's"). Vendors must be committed to the highest standards of ethical conduct when dealing with employees, suppliers and customers. This Code of Conduct sets forth the basic requirements that all Vendors must comply with in order to do business with Lowe's. If Lowe's believes that any Vendor has violated this Code of Conduct, Lowe's has the right to terminate its business relationship with the Vendor and to proceed to secure any and all other rights and remedies available to it. Lowe's reserves the right to reasonably change the requirements of the Code of Conduct and, in such an event, expects the Vendor to accept such reasonable changes.

- 1. Compliance with Laws and Lowe's Policies:** Vendors must fully comply with all applicable national and/or local laws and regulations and Lowe's policies. To the extent that Lowe's policies impose a higher standard than what is required by applicable national and/or local laws and regulations on its Vendors, such higher standard will prevail.
- 2. Forced Labor:** Vendors shall not use any form of forced, bonded, indentured, trafficked, slave or prison labor, with the exception of government approved programs that utilize convicts or prisoners on parole, supervised release or on probation or in any penal or reformatory institution. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. All workers must not be required to surrender any government-issued identification, passports or work permits as a condition of employment.
- 3. Child Labor:** Child labor is strictly prohibited. The minimum age for employment shall be the higher of 16 years of age, the minimum age for employment in that country or the minimum age for completing compulsory education in the country of manufacture.
- 4. Compensation:** Vendors shall pay all workers at least the minimum wage and benefits required by applicable laws and regulations. Workers shall be compensated for overtime hours at the premium rate required by applicable laws and regulations.
- 5. Freedom of Association:** Vendors must respect the rights of all employees to lawfully associate or not to associate with groups of their choosing, as long as such groups are permitted by law. Vendors should not unlawfully interfere with, obstruct or prevent legitimate, lawful employee associations and related activities.
- 6. Employment Practices:** Vendors must have hiring practices that verify accurately age and ability to work legally.
- 7. Acceptance of Gifts and Benefits:** Lowe's prohibits giving or accepting gifts or entertainment exceeding nominal value to or from any of its Vendors unless applicable law prohibits the giving or accepting of gifts or entertainment of nominal value. This applies to Lowe's employees, agents, contractors, and each of their immediate family members. The following types of gifts and entertainment may never be offered, regardless of value: cash or cash equivalents (i.e. gift cards); any gifts that are or could be illegal; any gifts or entertainment (including meals, transportation and travel accommodations) offered in connection with an inspection, audit, during a bidding process involving the Vendor, or to a Lowe's agent or consultant working on behalf of Lowe's. This policy does not change during traditional gift-giving seasons.
- 8. Sourcing:** Lowe's requires all Vendors supplying goods and services to Lowe's stores or facilities to share Lowe's commitment of utilizing small business in subcontracting opportunities relating to their Lowe's contracts. If any subcontracting occurs, the performance of such subcontractors, consultants, agents or representatives ("Subcontractors") must be consistent with Vendors' performance of their contracts with Lowe's. For information regarding this requirement, Vendors supplying or seeking to supply goods and services to U.S. stores or facilities should consult Lowe's Supplier Diversity Program.
- 9. Conflict Minerals:** The term "Conflict Minerals" means cassiterite (tin), columbite-tantalite (a/k/a coltan or tantalum), gold, or wolframite (tungsten). Vendor shall not provide products to Lowe's that contain Conflict Minerals sourced from the Democratic Republic of the Congo or an adjoining country, including Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (collectively and with the Democratic Republic of the Congo, the "Covered Countries") unless the Conflict Minerals are sourced from a certified mine or a conflict free smelter. Vendor shall have programs in place that satisfy this requirement, and part of such programs shall include



(i) maintenance of records that support Vendor's obligation to provide products to Lowe's that do not contain Conflict Minerals originating in Covered Countries unless the Conflict Minerals are sourced from a certified mine or a conflict free smelter and (ii) participation in any information requests by Lowe's related to the inclusion of Conflict Minerals in Vendor's products.

- 10. Health and Safety:** Vendors shall provide all workers with a safe work environment and shall provide all workers with appropriate personal protective equipment and workplace health and safety information and training.
- 11. Environment:** Vendors must comply with all national and local environmental laws applicable to air emissions, waste handling and disposal, water use, wastewater discharges, and hazardous and toxic substances. Vendors shall also validate and maintain records demonstrating that source materials were harvested in accordance with all international treaties in addition to national and local laws.
- 12. Conflicts of Interest:** Vendors shall not engage in any activity with an employee of Lowe's which could create a real or perceived conflict of interest.
- 13. Subcontractors:** If permitted by the terms of its agreement with Lowe's, Vendors shall not retain any Subcontractors without a thorough documented examination of the Subcontractors' person, reputation and integrity. In addition, Vendors shall not retain any Subcontractors in connection with their provision of services or goods to Lowe's unless the Subcontractors comply with the Code of Conduct. Vendors must remain responsible for ensuring that their Subcontractors comply with the Code of Conduct.
- 14. Anti-Corruption:** Vendors must not tolerate, permit, or engage in bribery, corruption or unethical practices whether in dealings with public officials or individuals in the private sectors. Vendors must conduct business in compliance with all applicable laws and shall avoid engaging in any activity which could be deemed a corrupt and/or unethical practice. Vendors must maintain integrity, transparency and accuracy in all records of matters relating to their business with Lowe's. For the purpose of obtaining or retaining business for the benefit of Lowe's, Vendors must not make or receive, offer to make or receive, or cause another to make or receive, payments or anything of value, to or from any public or private officials.
- 15. Confidentiality and Intellectual Property:** All Vendors and their representatives are expected to maintain the confidentiality of information entrusted to them by Lowe's or its customers. Vendors must respect and protect Lowe's intellectual property rights and maintain the confidentiality of trade secrets and other Lowe's proprietary information which includes any information that is nonpublic or not easily obtained or determined. Vendor shall not use stolen or misappropriated technology.
- 16. Monitoring and Enforcement:** Lowe's, by itself or with the assistance of a third party, will take affirmative measures, such as announced and unannounced inspections of production facilities, to ensure compliance with this Code of Conduct. Vendors must maintain all documents to demonstrate compliance with this Code of Conduct and shall make such documents available to Lowe's upon request.
- 17. Whistleblower Protection:** Vendors shall create programs to ensure the protection of worker whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of the Code of Conduct. Vendors shall provide an anonymous complaint mechanism for workers to report workplace grievances and Code of Conduct violations in accordance with local laws and regulations.

Violations of Lowe's Code of Conduct can be reported confidentially in a local language. To report suspected violations of the Lowe's Vendor Code of Conduct, please contact Lowe's through one of the following means:

- Via the internet: www.ethicspoint.com
- Via the telephone: 800-784-9592 for the U.S. and Canada; 10-800-120-1239 for Southern China; 10-800-712-1239 for Northern China; 800-964214 for Hong Kong; 001-8008407907 or 001-866-737-6850 for Mexico; 00801-13-7956 for Taiwan; 1-800-80-8641 for Malaysia; 001-803-011-3570 or 007-803-011-0160 for Indonesia; 120-11067 for Vietnam; 001-800-12-0665204 for Thailand; 000-800-100-1071 or 000-800-001-6112 for India; 01800-9-155860 for Colombia; 0800-8911667 for Brazil or 503-619-1883 for use internationally.