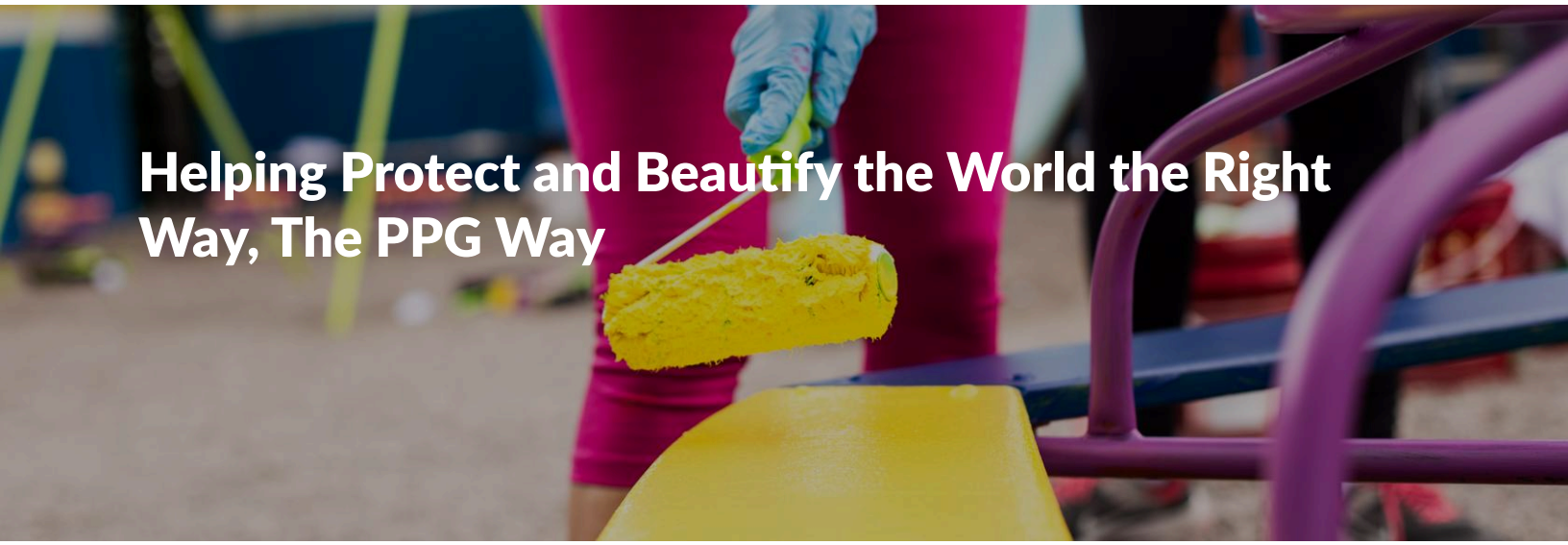


# Helping Protect and Beautify the World the Right Way, The PPG Way

We protect and beautify the world™

PPG Global Code of Ethics


SECTION I: INTRODUCTION.

- Introductory Message from the Chairman and CEO.
- Introduction.

SECTION II: WE TREAT ONE ANOTHER WITH RESPECT.

- We Act Respectfully.
- We Are Inclusive.
- We Keep Our Workplace Safe.

SECTION III: WE ARE HONEST AND TRANSPARENT.

- We Demonstrate Financial Integrity.

 We Protect Against Money Laundering and Financial Crime.

 We Comply With Security Trading Rules.

 We Communicate Carefully.

SECTION IV: WE CONDUCT BUSINESS WITH INTEGRITY.

 We Compete Fairly.

 We Don’t Offer or Accept Bribes or Kickbacks.

 We Exchange Gifts and Hospitality Appropriately.

 We Follow Trade Controls.

SECTION V: WE ACT RESPONSIBLY.

 We Avoid Conflicts of Interest.

 We Protect Personal Information.

 We Safeguard Confidential Information.

 We Use Corporate Assets the Right Way.

 We Work Responsibly With Our Business Partners.

 We Understand Political Participation Rules.

CONCLUSION.

 We Care for Each Other and Our Community.

- **Conclusion.**

- **Download a Printable PDF Version of the Code.**

# Introductory Message from the Chairman and CEO.



**"'Global Code of Ethics' is at the core of our success."**

*- Tim Knavish  Chairman  and CEO*

There's nothing more important to us, as individuals, than our good name and reputation. For PPG, it's the same for us as a company.

Our personal and companywide success, growth and competitive advantage centers on continuing a legacy for trustworthiness and the excellent relationships and partnerships we maintain with neighbors, employees, suppliers, shareholders and customers. We must safeguard that reputation every minute of the day in every corner of our global operations.

Our Global Code of Ethics (GCOE) embodies our values and expectations as an ethical company. It is at the core of The PPG Way.

It's essential that each of us knows, understands and fully abides by PPG's unwavering commitment to ethics. That commitment – and high standard of integrity and professional conduct that it brings – enables us to trust our people, in every way, to make it happen.

The GCOE helps to guide our behaviors and actions. It keeps us on the narrow path to do better today than yesterday – every day. It makes PPG an extremely special place to work.

Please be sure to use the GCOE as a tool to help make the right decisions and resolve issues that you may encounter.

If you are ever unsure or feel that the Code or the law is being violated, it is important that you speak up. I strongly encourage you to talk with your manager, your Human Resources representative, or the Law and Compliance Department.

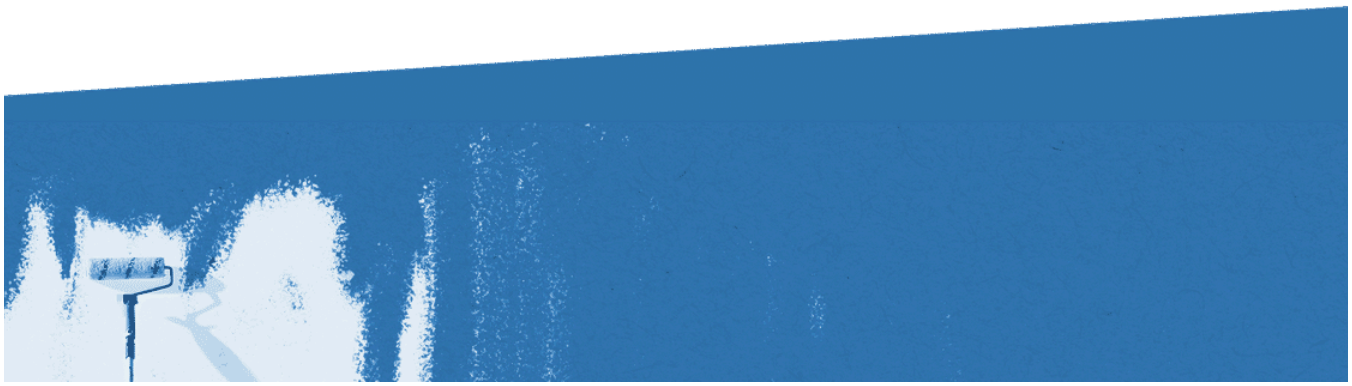
You may also share concerns anonymously by phone or by using an online web reporting feature through the multilingual PPG Ethics Helpline.

It takes a focused effort – every day – to achieve our goals and maintain the trustworthiness that is at the very heart of our global PPG culture.

*Sincerely,*

*Tim Knavish*

*Chairman and CEO*



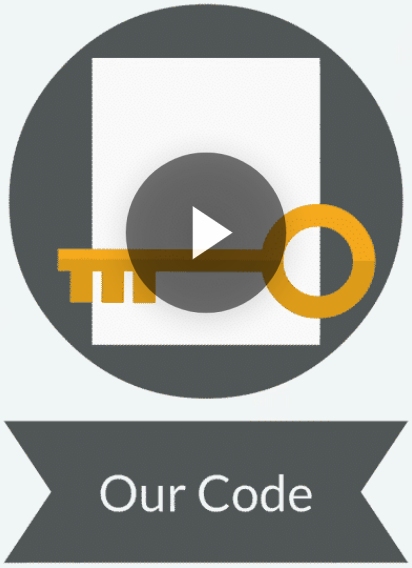

TINTAS
RENNER
Pisos
ACRÍLICO PREMIUM
SIGMA
COATINGS
Façade Topcoat
Satin
DYCRILFORCE
JOHNSTONE'S
TRADE
Acrylic
Durable
Matt
Aqua

*Lesson 2 of 22*

# Introduction.

We protect and beautify the world™






### Why do we have a Code?

At PPG, we are committed to helping beautify and protect the world the right way, The PPG Way. We hold ourselves to a very high standard of integrity and professional conduct. Our company's reputation for being an ethical partner, wherever we operate, is a crucial competitive advantage.

This Global Code of Ethics (the "Code") embodies our core values and expectations as an ethical company. The Code highlights our commitment to conduct business the right way by explaining our ethical obligations under the law, our internal policies, and by helping to guide our decisions when we face questions or situations where we are unsure how to proceed.

### To whom does the Code apply?

The Code applies to all of us at PPG — including employees, officers, and directors. Failure to comply with this Code will result in disciplinary action, up to and including termination. But following this Code is more than simply an obligation, it is our responsibility to one another and to our company. We also expect that all suppliers, customers, distributors, resellers, agents, consultants, and other third parties

who conduct business on our behalf will share a commitment to our ethical standards, our values, and to the principles outlined in this Code.

### How do we use the Code?

We should use this Code as a tool to help make the right decisions and to resolve various ethical issues that we may encounter. This Code addresses important issues that we may face when conducting our business and directs us to policies and resources that provide more specific information when we need additional guidance or detail on a particular topic.

### We are counting on you to speak up and promote our speak up culture.

We are depending on one another to be brave and to speak up if we have questions or concerns about ethical misconduct. It is a critical part of honoring our commitment to do business the right way and a responsibility and obligation that we all share.

When we speak up, we make PPG a better place to work and we do right by everyone who depends on us, including our customers, our fellow employees, and our stakeholders. We also enable PPG to address concerns and help resolve issues early. The sooner we raise concerns, the sooner PPG can work to begin making things better.

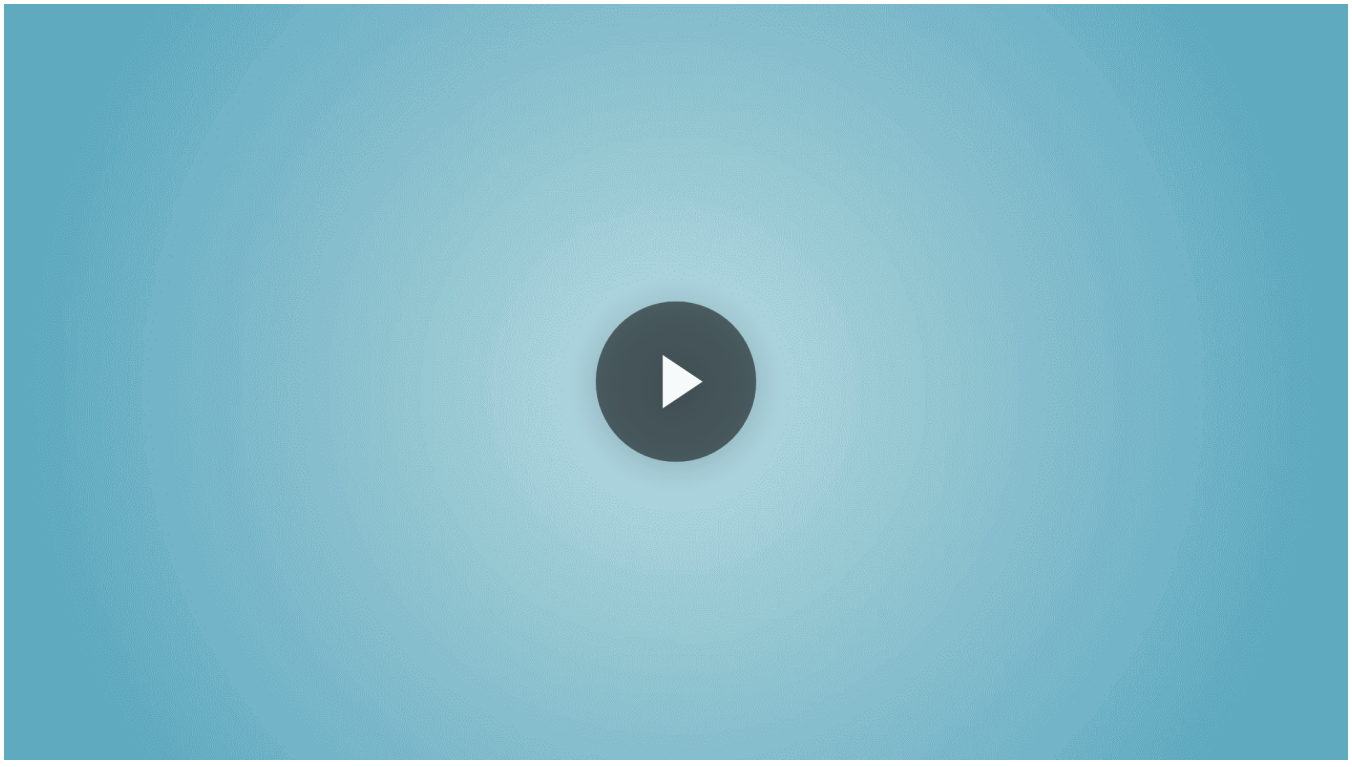
### We do not tolerate retaliation.

We will not tolerate retaliation at PPG. Individuals who report concerns honestly and to the best of their knowledge should never be treated unfairly.

If you feel that you are being treated differently because you've made a report or asked a question, share this concern with the Law and Compliance Department or one of your other PPG resources immediately.

### Support our investigation process.

You can count on PPG to conduct investigations fairly and objectively. If we need to investigate concerns of misconduct related to ethics and compliance, your cooperation is essential to a thorough and efficient investigation. It is your obligation as a PPG employee to be truthful and forthcoming if you are involved in any investigation, either as a reporter, a witness, or a potential subject. Trust that PPG will not tolerate any form of retaliation against an individual who participates truthfully and cooperatively in an investigation.

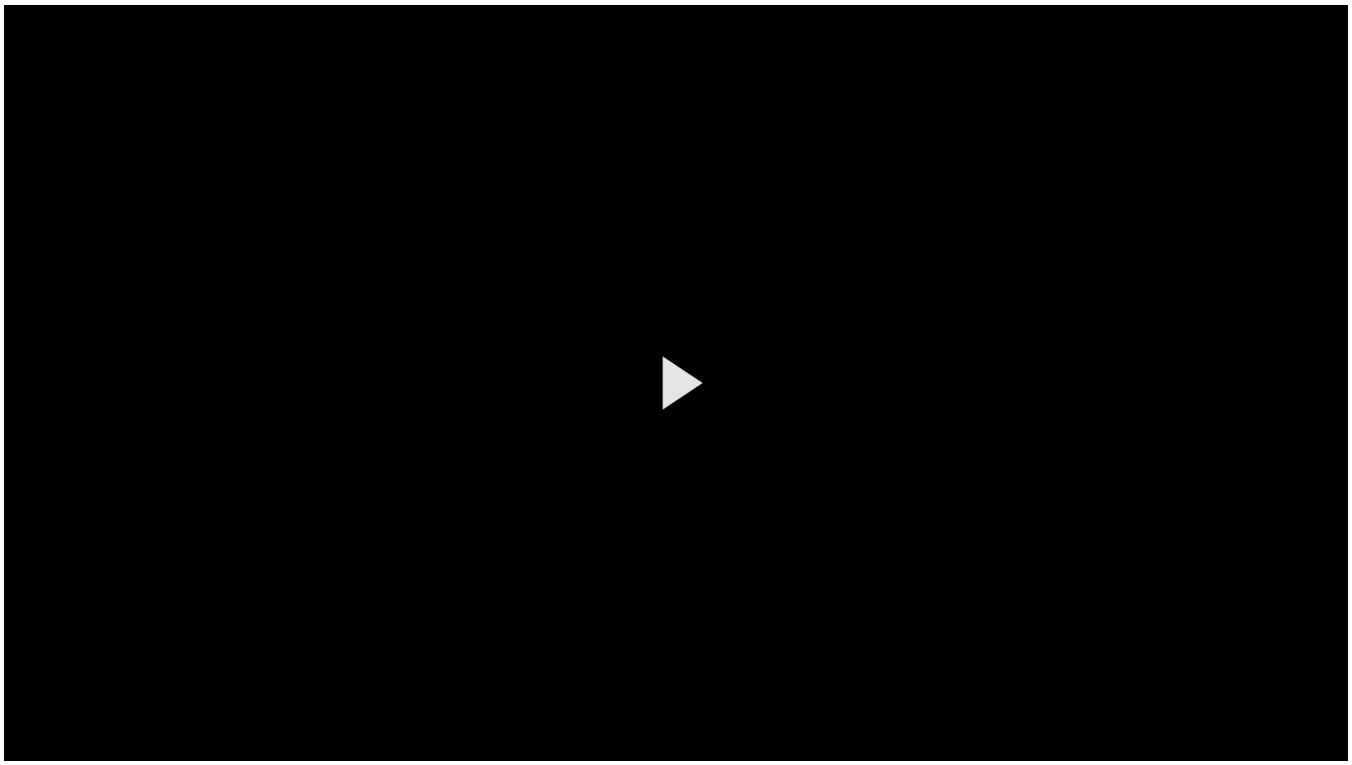


# How to Raise a Concern

When you have questions or concerns, there are many resources available to you at PPG, including:

- Your Manager
- Your Human Resources representative
- The Law and Compliance Department

You may also share concerns anonymously (subject to local law) by phone or web reporting through the multilingual PPG Ethics Helpline.



# The Right Way, The PPG Way

Conducting business the right way is foundational to everything that defines The PPG Way. When we act in accordance with this Code and make ethical decisions at every turn, we work together to be the best company and the best partner that we can be.

# What Employees and Leaders Must Do

Step 1

## Be Knowledgeable



- Read, understand, and comply with this Code and applicable legal requirements.

Step 2

## Be Accountable



- Use good judgment.
- Cooperate fully and with integrity in PPG investigations related to ethics concerns.
- Should you have any questions about this Code or how to respond in a particular situation, see How to Raise a Concern in this Code.
- If you are approached by anyone inside or outside PPG with a request to do something illegal or unethical, you must refuse to do so.

- Never retaliate against another employee for reporting an ethics or legal concern in good faith. Retaliation will not be tolerated.

Step 3

## Be Honorable



- Personally set the example for ethics through actions and words. Stand for what is right and ensure that the truth is known.
- Demonstrate integrity and high ethical standards in all of your business dealings.

Step 4

## Be Respectful



- Create an open environment in which every employee feels comfortable raising concerns.
- Managers must communicate the importance of ethics and compliance with sincerity and conviction at every appropriate opportunity.

Step 5

## Be Courageous



- Promptly raise concerns about potential violations of the law or this Code.
- Managers are expected to take appropriate corrective action when the situation demands it, in consultation with appropriate PPG management.




# Other Responsibilities of Managers

Employees tend to report misconduct most often to their managers. As a manager, it is important that you be an advocate for your direct report(s). If a direct report brings an issue to you, make sure to take it seriously. Take the following steps:

- Thank the employee for coming forward and listen carefully to what they have to say. Remain objective.
- Advise the employee that any investigation will be handled confidentially by the appropriate departments and personnel. Reassure the employee that they will be protected from retaliation when making a good faith report.
- Escalate issues if appropriate. If it is a potentially significant issue such as harassment, bullying, theft, or breach of confidentiality - escalate immediately to HR or the Law and Compliance Department.
- Recognize and prevent retaliation. As a manager, you have a unique responsibility to adhere to and enforce the company's nonretaliation policy.

We expect managers to be good role models, fostering a safe and positive work environment in which only ethical and responsible behaviors are acceptable. Managers must model appropriate behaviors, identify and mitigate ethics and compliance risks, and communicate the importance of ethically sound business practices. A good role model displays integrity and transparency when handling all challenging situations.



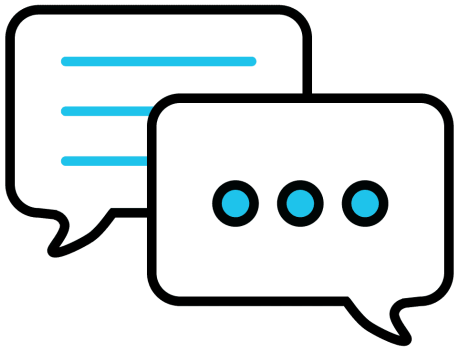

**Our success depends on your ability to make decisions that are consistent with The PPG Way. Regardless of the situation, act with total integrity in everything you do.**

## Consider Your Actions, and Ask for Guidance

**If you are ever in doubt about a course of action, ask yourself:**

Is it legal? ✔

Is it consistent with the Code? ✔



Does it reflect PPG's values? ✔

Is it in PPG's best interest? ✔

Will it reflect well on me and PPG? ✔

Would it be all right if it appeared in a news headline? ✔

If the answer is "no" to any of these questions, don't do it. If you are uncertain, ask for guidance. Refer to the How to Raise a Concern section in this Code for information on how to seek help.



*Lesson 3 of 22*

# We Act Respectfully.

PPG We protect and beautify the world™




We perform at our best when we feel valued, working in a place that is free from harassment and bullying. At PPG, we treat one another respectfully. We will not tolerate harassment and bullying no matter where we work, and

we trust all third parties who partner with us or work on our behalf to take this commitment seriously.

## Know Your Role:

- Act professionally and respectfully at all times and encourage and support those around you to do the same.
- Speak up if you have concerns that someone is acting disrespectfully or if someone is being mistreated.
- Understand that managers have additional obligations to act if they have concerns about harassment.

## Understand Harassment and Bullying

### Harassment

Harassment is unwanted and offensive verbal, nonverbal, or physical conduct that creates an environment of hostility or intimidation for a person because of sex, gender, sexual orientation, gender identity and/or expression, race, age, national origin, ancestry, citizenship status, physical or mental disability, medical condition, genetic information, religion, creed, military or veteran status, or other status protected by law.

### Bullying

Bullying is repeated verbally or physically abusive or malicious conduct that undermines or interferes with another's work performance or which a reasonable person would find offensive, threatening, intimidating, or humiliating.



**The Right Way ...**

**to Foster a Considerate Workplace**

We all need to work together to create a work environment that is free from harassment and bullying — a place where we all feel comfortable coming to work each day. It's imperative that we

hold each other accountable for this commitment.

This means modeling professional and respectful behavior at all times. It also includes speaking up when we see disrespectful behavior.



**The Right Resources**

Anti-Harassment Policy

PPG Ethics Helpline


MaxMeyer
PPG
Valtti Plus Terrace Oil
KESTÄVÄ TERASSIÖLJY
Harmony
Supi Saunavaha
SAUNA CARE
Supi Saunasuoja
0,9 L
Supi Lattiaöljy

# We Are Inclusive.




We believe diverse teams perform better. We do our best work when we engage with each other and draw on unique and individual perspectives to reach shared goals. We value differences among us and strive for a collaborative

environment where everyone can bring their whole self to work. We give equal employment opportunity to — and do not discriminate against — individuals on the basis of any status protected by applicable laws.

## Know Your Role:

- Recognize that different opinions, perspectives, and experiences make PPG who we are today.
- Share your ideas and perspectives, even if they might be different from those around you.
- Strive to include coworkers (especially those from different backgrounds) in conversations and discussions, welcoming new ideas and contributions.
- Join an employee resource network to meet new employees all around the world to celebrate our differences.
- Build your DE&I capabilities and learn through education and experiences to increase your skills to work and lead inclusively.

- Become an ally and advocate by helping each other create stronger and healthier work environments and communities together.
- Be courageous and rise against bullying, harassment, and discrimination and report concerns to the PPG Ethics Helpline, managers, or Human Resources.

## The Right Way … to Build a Team

PPG counts on people managers to be role models of leading inclusively. People managers:

## Are Committed to Diversity

Are committed to diversity, challenge the status quo, hold others accountable, and make diversity, inclusion, and equity a personal priority

## Are Modest About Capabilities

Are modest about their own capabilities, admit mistakes, and create space for others to share ideas

## Demonstrate an Open Mindset

Demonstrate an open mindset, listen without judgment, and seek empathy to understand those around them

## Empower Others

Empower others, pay attention to diversity of thinking and psychological safety, and focus on team cohesion

## Make Merit-Based Decisions

Make employment-related decisions based on merit and job qualifications, which include education, experience, skills, ability, and performance

## Understand Discrimination

Discrimination involves treating someone differently or unfairly based on certain legally protected characteristics, such as race, color, creed, religion, national origin, ancestry, citizenship status, age, physical or mental disability, pregnancy, medical condition, genetic information, military or veteran status, marital status, sexual orientation, gender identity or expression, or any other legally protected status. An example would be determining not to promote someone because they are

expecting a child or assuming they don’t have enough experience based on their age.



*Lesson 5 of 22*

# We Keep Our Workplace Safe.

We protect and beautify the world™




Keeping our employees safe is our most important core value. When we come to work, we all need to do our part to keep each other safe. This includes following procedures, policies, laws, and regulations as well as being

ever alert to potential hazards. Committing to a safe workplace includes maintaining a workplace that is free from weapons and violence, as well as the use of drugs and alcohol on PPG premises.

## Know Your Role:

- Understand and adhere to your responsibilities in meeting environmental, health, and safety objectives.
- Come to work rested, alert, and unimpaired by alcohol or drugs.
- Never engage in intimidating or threatening behaviors and do not tolerate such behavior from anyone around you.
- Act responsibly if you are at a social function, event, or conference where alcohol is permitted, making sure not to endanger your safety or the safety of others.
- Speak up immediately if you have concerns that something could cause harm to you, a coworker, or anyone else — and encourage others to do the same.

**The Right Way … to Keep Each Other Safe**



Although we never expect violent events to happen at our company, we need to be prepared to respond to safety concerns if they arise. Protecting one another is part of our pledge to keep our workplace safe. We rely on one another to raise concerns about suspicious behavior from a coworker or other individual in our workplace.

**Use Caution … If You See Something,**

**Speak Up!**



If you ever see behavior that just does not feel right, speak up, stay out of harm's way, and seek assistance. Some examples include:

- Someone you do not recognize being in a secured area
- Someone acting suspiciously or out of character

## THE RIGHT RESOURCES

Workplace Violence Policy

PPG Ethics Helpline



# We Demonstrate Financial Integrity.

We protect and beautify the world™




Our customers and stakeholders trust us to report and maintain certain information about our company (including financial results) accurately, completely, in a timely manner, and in accordance with the law. This means

that we all need to prepare and manage our records responsibly. To comply with all reporting and records requirements, we must maintain and follow appropriate controls, policies, and procedures.

## Know Your Role:

- Comply with all policies that govern how PPG reports information and retains records, including our accounting and financial reporting policies, our travel and expense reporting policies, and our record retention policies.

- Record all expenses and costs accurately, honestly, completely, and in a timely manner.

- Cooperate with internal and external auditors whenever applicable.

- Report any errors or concerns regarding financial statements or entries as soon as possible.

- Pay close attention to any specific instructions from the Law and Compliance Department relating to records that pertain to litigation or investigations.

# Understand Responsible Records Management

When we talk about maintaining our records responsibly, we mean more than just financial statements. We need to make sure we maintain all records accurately and according to our policy. This includes:

- Expense reports
- Product information or specifications
- Data about our employees
- Information about our suppliers or other business partners
- Other financial records and supporting documentation

**Use Caution**

We can all work together to demonstrate financial integrity. If



something does not feel right, speak up. Here are some examples that could indicate there is a potential issue with financial reporting:

- Financial results that seem inconsistent with underlying performance
- Circumvention of review and approval procedures
- Incomplete or misleading communications about the substance or reporting of a transaction

## THE RIGHT RESOURCES

The Controller's Manual

Records Management Policy

PPG Ethics Helpline



# We Protect Against Money Laundering and Financial Crime.




The people and companies with whom we work can affect our reputation as an ethical company. We conduct business only with organizations involved in legitimate business activities, with funds derived from legitimate

sources. We are committed to complying with applicable anti-money laundering, anti-corruption, and anti-terrorist financing laws and regulations.

## Know Your Role:

- Understand with whom you are doing business and the legitimacy of their business practices and activities.
- Be alert for any signs of potential money laundering, terrorist financing, or other illegal activities and report them immediately.

## Understand Money Laundering

Money laundering is the process of concealing illicit funds or making these funds look legitimate.

**Use Caution**

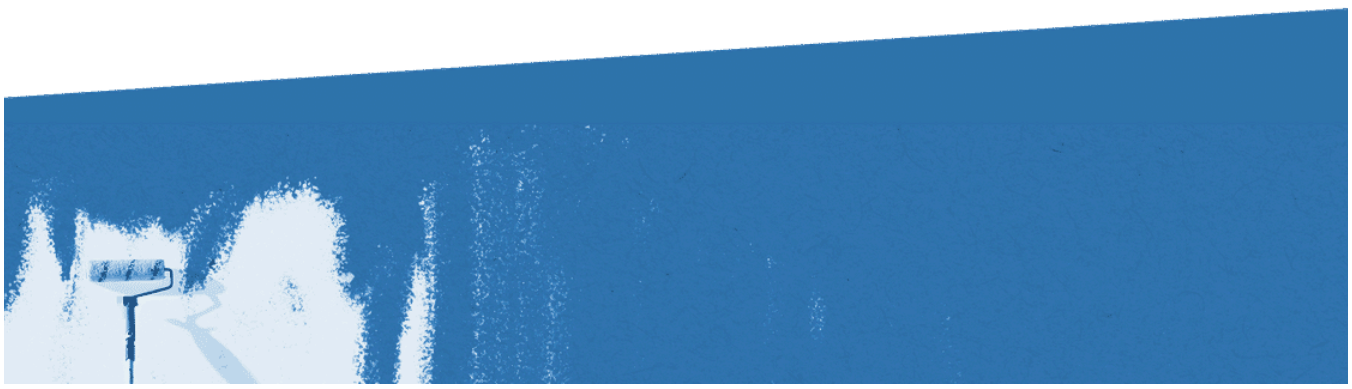
Here are some signs of potential money laundering:



- Attempts by a customer to provide false or anonymous information to open an account, or refusal to provide requested information
- Payments made or requested in currencies other than those specified in the contract, or requests to pay more than provided for in the contract
- Orders, purchases, or payments that are unusual or inconsistent with a customer's trade or business
- Payments on behalf of a customer from an unknown or anonymous person or from

an unusual non-business account

- Transactions structured to evade reporting requirements in any jurisdiction
- An unusual pattern of transactions, such as bulk purchases of products or gift cards, or repetitive cash payments




Ultra Classic
Pika-Teho
Vinha
Colour It
Dulux
DIAMOND
INTERIOR PAINT
Dulux
Lifemaster
Comex
TINTAS
RENNER
Pisos
ACRÍLICO PREMIUM
INTERIOR / EXTERIOR

# We Comply With Security Trading Rules.

We protect and beautify the world™




Insider trading laws are designed to prevent an unfair advantage in the market, and we all play a role in preventing insider trading. We may not buy or sell securities when we are aware of information that has not

been shared publicly and that could have an effect on the value of a stock. We may not share material nonpublic information or “tip” another person to trade on that information. This applies to PPG stock and to third party stock, including the stock of a supplier, customer, or business partner of PPG.

Using material nonpublic information for your financial or other personal benefit, or sharing it with others, violates PPG’s insider trading policy and may violate the law. We must all commit to adhering to our ethical and legal obligations when we have access to any PPG nonpublic information.

## Know Your Role:

- Don’t use or share material nonpublic information for financial or any other personal benefit.
- Never buy or sell the securities (such as stock, bonds, or options) of PPG or any other company, either directly or through family members, other persons, or

entities while you are aware of material nonpublic information.

- Don’t recommend that anyone buy or sell the securities of any company — including PPG — while you have material nonpublic information about that company.
- Only share material nonpublic information when necessary for PPG’s business activities and with proper controls in place (such as a nondisclosure agreement with a supplier).
- Avoid trading PPG securities if you are aware of a significant announcement, such as quarterly earnings.
- Do not serve as an independent consultant or expert outside of PPG on business matters within the scope of your PPG employment.
- Contact the Law and Compliance Department immediately if you have knowledge that any material nonpublic information has been disclosed inappropriately or if you have questions about whether something is inside information.

# Understand Material Nonpublic Information

Material nonpublic information is information you may learn in your job about PPG or other companies that has not been made public. Nonpublic information is “material” if a reasonable investor would consider it important in deciding to buy, hold, or sell securities, or if publication of that information would likely affect a company’s stock price.

Material nonpublic information may include:

- Financial forecasts
- Earnings information

- Changes in dividends that have not yet been announced
- Proposed or pending acquisitions/divestitures
- Securities offerings or stock repurchase plans
- Pending changes in senior managership
- Regulatory actions

Determining if nonpublic information is material is not always straightforward and depends on the facts and circumstances. Please consult the Law and Compliance Department if you are unsure.

## The Right Resources

Guidelines for Handling and Protecting PPG's Non-Public Information

PPG Ethics Helpline



# We Communicate Carefully.




We maintain a consistent message reflecting our company's ethics and current corporate strategies, policies, and interests. When it comes to communicating with and through the media, we adhere to government, stock

exchange, and other disclosure requirements. We must all remain committed to consistent and reliable communication, both with one another and with our stakeholders.

We do not formally endorse or recommend any product, service, or company (whether for-profit or not-for-profit) without appropriate business justification. To maintain clarity when communicating PPG's financial results, we do not make any announcements about anything that could cause a normal investor to change their position on the company's stock during the week in which PPG announces quarterly earnings.

## Know Your Role:

- Always consult with corporate or business unit communications representatives before responding to external media requests on behalf of PPG.
- Observe PPG's policies on both business use of social media and personal use of social media.

**The Right Way …**

**to Use Social Media**



Social media can be a great way to promote PPG, our products, and our commitment to helping protect and beautify the world. But if we don't demonstrate good sense and judgment, it can also be harmful to us, our company, and those around us. Remember that we are personally responsible for what we post online:

- Be clear that your posts represent your personal views

and not the views of PPG.

- Be aware that how you use social media can reflect on all of us, even if you post content that has nothing to do with PPG or your work for the company.
- Never share confidential information about PPG or any of the third parties with whom we work.



**THE RIGHT RESOURCES**

Social Media Policy

PPG Ethics Helpline


Ultra Classic
Pika-Telho
Vinha
Colour It
Dulux
DIAMOND
INTERIOR PAINT
Dulux
Lifemaster
Comex
TINTAS
RENNER
Pisos
ACRÍLICO PREMIUM
INTERIOR / EXTERIOR

*Lesson 10 of 22*

# We Compete Fairly.




Antitrust and competition laws promote fair competition by prohibiting conduct that can harm the consumer, such as agreements between companies to fix prices or divide market share or customers. We compete vigorously,

aggressively, fairly, and in compliance with all applicable laws and regulations, including the antitrust laws of the United States and the competition laws of every other country in which PPG conducts business.

## Know Your Role:

- Understand how antitrust and competition laws apply to your job in the regions and countries in which you work.
- Be aware that contact with competitors may create the perception of improper agreements or understandings.
- Do not enter into discussions, formal agreements, or informal understandings with our competitors concerning anything related to our business.

# Understanding Anti-Competitive Agreements

Competitors cannot make agreements to limit competition.

For example:



Never discuss pricing, production, or inventory with a competitor.



Never agree with a competitor to divide up a market (i.e., “We will only sell our product in x territory, if you agree to only sell your product in y territory”).



Never coordinate bids for the same work, so that you each get a percentage of the whole deal.



Never work with one competitor to push another competitor out of the market.

Be sure to work with your Law and Compliance Department to review certain arrangements with customers and suppliers, such as exclusive supply/purchase agreements and territory and customer group arrangements.

**The Right Way ...**

**to Collect Competitive Intelligence**



It is important and appropriate to learn about and understand our competitors' strategies. But we must collect, receive, and use competitive information carefully and honestly. We should only use information that is publicly available and may never:

- Seek to gain information about competitors through improper or deceptive means, such as spying, theft, or misrepresentation
- Use a customer, supplier, or other third party as a conduit to enable communication with our competitors



**Use Caution**

We all need to watch out for and remove ourselves from situations where competitive information is inappropriately discussed. Be especially careful at trade and professional association meetings. If you find yourself in a conversation that crosses the line, leave immediately and promptly inform your PPG Law and Compliance Department.

## The Right Resources

Antitrust/Competition Law website

Trade and Professional Association Guidance

PPG Ethics Helpline



*Lesson 11 of 22*

# We Don’t Offer or Accept Bribes or Kickbacks.




How we conduct business is a reflection of who we are as a company. We do not tolerate corruption in connection with any of our business dealings. Doing business the right way means never engaging in bribery, regardless of local

practices or the actions of our competitors. PPG complies with global anti-bribery and anti-corruption laws, and we never offer or promise anything of value to *anyone* in exchange for an unfair business or personal advantage.

## Know Your Role:

- Do not offer, give, or accept bribes or kickbacks — directly or through another party — to or from a government official, government entity, or any private entity.
- When working with third parties, follow your business compliance procedures, including all due diligence requirements. Our business compliance procedures are designed to protect you and PPG by reinforcing our goal to work only with third parties who agree to comply with our Global Anti-Corruption Policy and abide by our ethical standards and applicable law.

# Understand Bribes and Kickbacks

## Bribes

People often think of bribes as cash payments in exchange for business. But bribes can come in many different forms, including providing anything of value to an individual in exchange for a permit, license, certification, customs service, or other business or personal advantage. A bribe can be in the form of cash, gifts, meals, entertainment, business opportunities, PPG product, offers of employment, charitable contributions, and more. And there is no monetary threshold — anything of value could be considered a bribe.



## Kickbacks

A kickback is a particular form of bribe in which anything of value (money, goods, or services) is given for improper purposes to someone in return for an advantage in a business arrangement. Kickbacks are usually arranged in advance as part of the business transaction. Some examples include:

- A third-party business partner giving a portion of the commission it received from PPG back to the employee who retained the third party's services
- In exchange for awarding a certain vendor business, a procurement employee receiving season sports tickets from the vendor for personal use



**Use Caution**

Understand that PPG may be responsible for the actions of any third party that represents us. When we choose our business partners, including agents and consultants, we make it clear that



they must comply with our policies and abide by our ethical standards.

Violations of anti-bribery laws and regulations can result in severe criminal and/or civil penalties for both PPG and the individuals involved.

**The Right Way … to Make a Charitable Contribution**



Bribes can be disguised as charitable contributions when made for improper purposes or at the direct request, suggestion, or recommendation of a government official or commercial partner.

At PPG, make all charitable contributions fairly and impartially. We follow all PPG program guidelines when making charitable contributions and seek guidance prior to making contributions on behalf of the company.



**THE RIGHT RESOURCES**

Global Anti-Corruption Policy

Global Gifts, Hospitality, Sponsorships and Charitable Contributions Policy



# We Exchange Gifts and Hospitality Appropriately.

We protect and beautify the world™




Exchanging gifts and hospitality can be an important part of promoting business relationships, but it is critical to follow company policies and use our best judgment. We must never exchange anything of value with third parties if

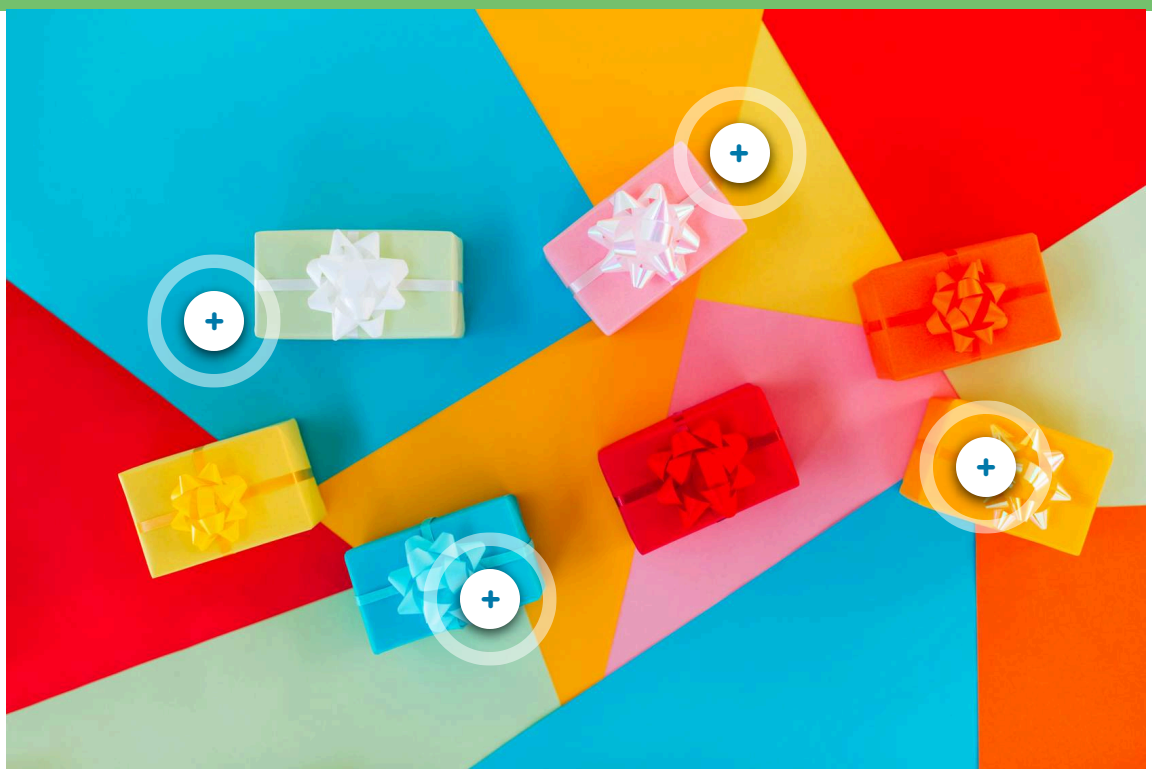
doing so could affect our ability to make business decisions fairly and objectively.

## Know Your Role:

- Exchange gifts and hospitality only if doing so will not impact your ability to be impartial.
- Know that gifts over a certain value require pre-approval.
- Do not provide gifts, hospitality, or anything else of value to government officials, employees, or representatives unless you've received the required prior approval according to regional policies.
- Record any expenses related to giving gifts and hospitality accurately and carefully.
- Take care not to give or accept cash or a cash equivalent. Cash equivalents are things that can be readily converted to cash, including gift cards redeemable at an unspecified merchant (like a Visa or Amazon gift card), vouchers, securities, and loans.

- Understand what a sponsorship is, how a sponsorship differs from a gift or charitable contribution, and your obligations as it relates to sponsorship.

## The Right Way … to Decline a Gift





**Decline...**

If you receive or are offered a gift, hospitality, or preferred treatment that you believe is inappropriate, you must refuse it if possible and report the event promptly to your manager and to the PPG Law and Compliance Department.



**Example...**

For example, when appropriate, a manager might raffle the gift off to the site.



**Return...**

If there is no opportunity to refuse the gift, you should return it with an explanation of PPG's policy on gifts.



**Donate...**

If it is not feasible for you to return the gift, or if returning the gift would offend the giver, please turn it over to PPG to donate it to a charity or otherwise distribute it equitably within PPG.

**Use Caution**

Here are some signs that a gift or hospitality is inappropriate:

- It does not have a legitimate business purpose, such as creating goodwill for PPG.
- It could reasonably be interpreted as an attempt to



improperly influence the recipient.

- It exploits, embarrasses, or degrades someone, or reflects negatively on our image.
- It violates the law or policy of the other party's employer.
- It is inappropriate, either in type, value, or frequency, considering the other person's business position.
- It carries an expectation of a reciprocal benefit (i.e., quid pro quo).

**The Right Resources** Global Gift, Hospitality, Sponsorships and Charitable Contributions Policy

Providing Gifts, Meals, and Entertainment to U.S. Public Sector (Government) Employees



# We Follow Trade Controls.

We protect and beautify the world™




We understand the importance of trade controls to national security, foreign policy, and our ability to compete around the globe. We are responsible for understanding and abiding by all applicable trade compliance laws,

regulations, and PPG policies and procedures in all countries where we do business. This includes regulation of import, export, re-export, and deemed export activities.

We comply with all trade controls, including sanctions and embargos, in our business transactions. As a U.S. company, we do not do business with entities, countries, or individuals that are restricted by the U.S. government — regardless of where we are located.

## Know Your Role:

- Understand and comply with relevant business procedures, legal requirements, and PPG policies to prevent any unauthorized or prohibited export from occurring if you are involved in multi-national transactions or communications.
- Contact your local Import Services team or your Export Control Coordinator if you have questions about trade controls.
- Know the trade controls that apply to your job and understand how to comply with them.

- Attain all required export licenses before shipping products, data, and technologies.
- Do not conduct business with parties subject to recognized sanctions or trade restrictions.

# Understand Trade Controls

IMPORTS | EXPORTS | BOYCOTTS | SANCTIONS

As an importer, we must correctly classify and value merchandise and provide other information enabling customs authorities to fulfill their responsibilities.




IMPORTS | EXPORTS | BOYCOTTS | SANCTIONS

As an exporter, we must follow requirements restricting the transfer of items and information to certain foreign countries or persons or for certain end uses. In some cases, the export may not be permitted at all — such as exports to embargoed and sanctioned countries or persons. In others, the export may require prior authorization from the U.S. or local government.




IMPORTS | EXPORTS | BOYCOTTS | SANCTIONS

Certain laws also prohibit support of boycott activities. And, even if a particular country does not have such a law, PPG's policy prohibits the support of boycott activities.

IMPORTS | EXPORTS | BOYCOTTS | SANCTIONS

Sanctions restrict our company from doing business with certain countries, entities, and individuals. As a global company, it's

important that we never do business with a country, entity, or individual that is subject to sanctions.



**Use Caution**

Work diligently to identify and screen the third parties with which we do business — including the ultimate end users of our products and technologies. Be sure to understand the ultimate end-use of our products and technologies as well.

## The Right Resources

[Export Compliance website]

# We Avoid Conflicts of Interest.

We protect and beautify the world™




A conflict of interest exists any time your personal interests influence or appear to influence our duty to act in PPG's best interest. We need to avoid conflicts of interest because they can prevent us from doing our jobs fairly and

impartially. At PPG, we make decisions that are in the best interest of the company and not influenced by the potential for personal gain.

## Know Your Role:

- Understand how to recognize a potential conflict of interest and avoid any interest that could impact your ability to do your best work on behalf of PPG.
- Consider PPG's reputation when you make decisions and avoid any activity or interest that could reflect or appear to reflect negatively on the company. Even when nothing wrong is intended, the appearance of a conflict of interest may have negative effects for the company.
- Always promptly disclose any potential conflicts of interest to your manager and other appropriate PPG resources.

**Use Caution**



Here are some examples of potential conflicts of interest:

- When you or someone close to you personally profits from a business transaction involving PPG
- Sharing PPG nonpublic information to benefit someone outside of PPG
- Providing services to any business or organization that competes with PPG
- Having a family member or close personal relation who works for a direct competitor
- Having a personal relationship in the workplace that may compromise PPG's best interest or your ability to act impartially
- Participating in secondary employment that affects your job performance
- Conducting personal activities during work hours that affect your job performance

**The Right Way … Avoid Conflicts of**

**Interest**



We want to do everything we can to avoid actual and potential conflicts of interest, but oftentimes employees and the company can work together to evaluate and resolve potential conflicts. Disclosing a potential conflict of interest may be all that is necessary. Your manager along with others will determine if any actions will be necessary to manage the conflict.

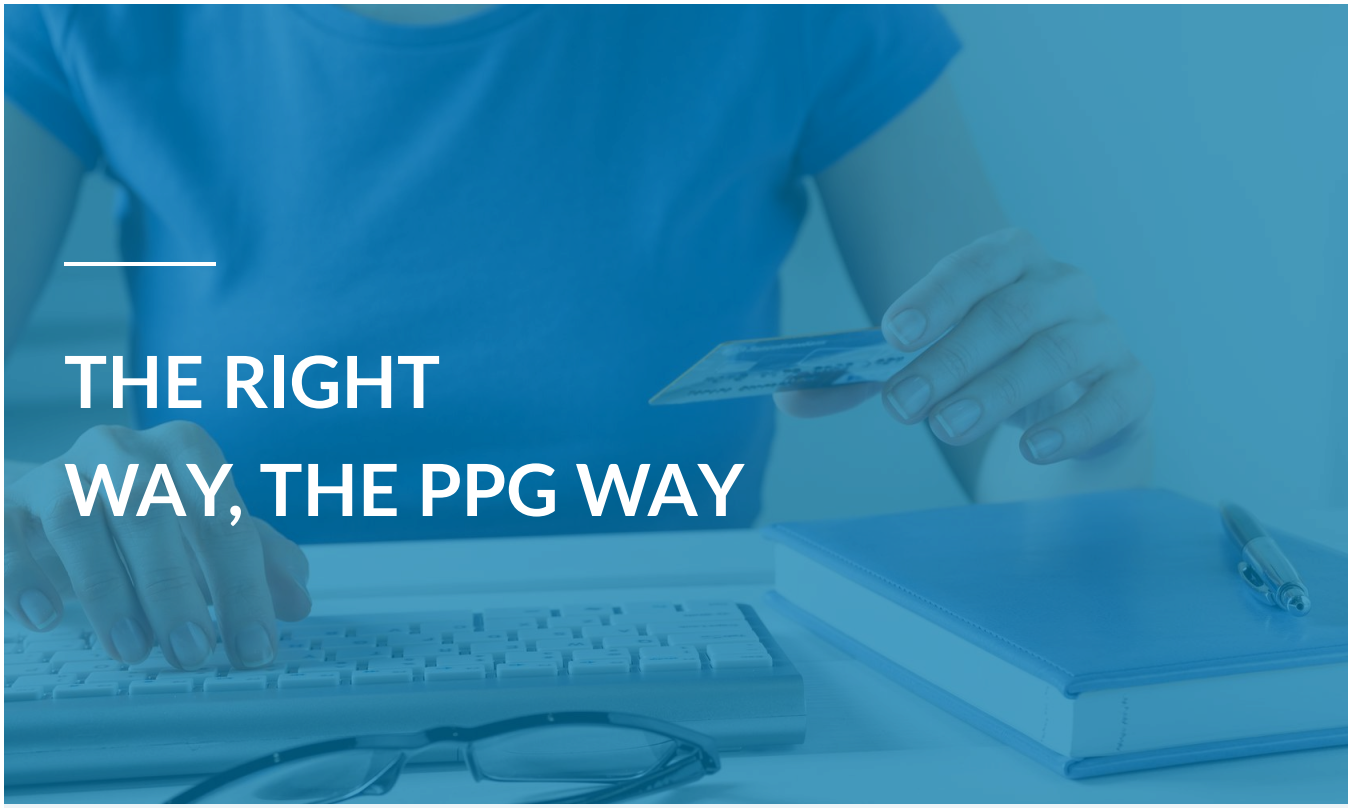
**THE RIGHT RESOURCES**

Conflicts of Interest Policy



# We Protect Personal Information.

We protect and beautify the world™




While working at PPG, we sometimes have access to personal and sensitive information about one another as well as about our customers and business partners. We protect personal information by complying with all

applicable data privacy laws and company procedures wherever we do business and by acting responsibly with personal information at all times.

## Know Your Role:

- Be transparent about the personal information we collect and how we use it.
- Collect personal information for specific, limited purposes and avoid information collection that is excessive or irrelevant for the intended purpose.
- Use personal information and data only for the purpose for which we originally collected it.
- Share personal information only with those who have permission to review it.
- Report to your manager or Law and Compliance Department if you notice instances where personally identifiable information (PII) is not adequately used or protected.

# Understand Personally Identifiable Information

Personally identifiable information (PII) is a broad term that covers a wide range of information that can be used to identify someone. PII includes, for example:





Full name, photos or images.



Contact information (e.g., physical address, email address).



Government identification numbers.



IP addresses and other device identifiers (e.g., browser ID, mobile device ID).

There are many data privacy laws around the world designed to keep PII confidential. We need to use and access PII only for its intended purpose and not share it with anyone who does not have a need to review or access it.

**The Right Way … to Protect PII**

We live in a digital world, where it is quite easy to unintentionally

misuse PII and other sensitive information. It is important to think carefully and proceed cautiously during our everyday work. Asking ourselves questions like, “Am I sending this email to the intended recipient?”, “Should I hit ‘Reply all?’” or “Would an individual expect that their PII be used that way?” are helpful ways to double-check ourselves.



**THE RIGHT RESOURCES**

Data Privacy



# We Safeguard Confidential Information.

We protect and beautify the world™




As part of our business, we have access to confidential information about PPG and other business partners with whom we work. Confidential information often drives our

business success, and we all have the responsibility to understand how to identify and protect it.

## Know Your Role:

- Recognize what is PPG confidential information and treat it carefully and in accordance with our policies.
- Discuss and share confidential information about our business and business partners inside the company only with those people who have a need to know the information, and outside of the company, only with those who have obligations to maintain the information in confidence. Information received under confidence from a third party or information a business partner would expect us to keep confidential should not be shared outside of PPG.
- Secure all confidential and sensitive information about our customers, coworkers, and other business partners and confirm that it is out of sight when not in use.

# Understanding Confidential Information

Confidential information is information about PPG that is not publicly available. Any information that would be of interest to a competitor would fall into this category. While most often we think of product formulations or manufacturing methods, there are many other examples as well, include marketing plans, executive level changes, raw material suppliers, organization charts, and the like.

**The Right Way ... to Keep Information**

**Safe**

We rely on our connected devices and information systems to conduct business every day, but

we need to protect the information that we store on them. Here are some ways we can help keep our information safe:



- Follow our policies and procedures that are designed to protect our systems from unauthorized access.
- Use strong passwords, and do not share your usernames and passwords.
- Be alert to phishing scams or other attempts to uncover sensitive personal or corporate information. Do not open suspicious links in emails, even if you think you know the source.
- Never use our systems to access, create, store, or transmit inappropriate or illegal materials, such as anything that is defamatory, offensive, or harassing.

- Be careful to protect hardware from loss, damage, and theft.
- Do not install unapproved software, applications, hardware, or storage devices on your company-issued computer.
- Do not send PPG confidential information to a personal email address because these systems often do not have an appropriate level of protection.

## THE RIGHT RESOURCES

Clean Workspace Policy



# We Use Corporate Assets the Right Way.

We protect and beautify the world™




Everyone at PPG benefits when we use our assets responsibly. Our assets include anything that belongs to the company, including our money, property, facilities, products, equipment, and communication systems.

Carelessness, theft, fraud, and waste have a direct impact on our company's success. We must use company assets with the same care with which we would use our own personal assets.

## Know Your Role:

- Use PPG's assets primarily for business purposes, making sure any personal use of company assets is limited, reasonable, and does not interfere with your job responsibilities.
- Protect devices that contain information about our company or that connect to our systems.
- Demonstrate good judgment when using PPG funds.
- Protect our intellectual property and contact the Law and Compliance Department if you have concerns about unethical or unauthorized use of our intellectual property or other assets.

# Understand Fraud

Fraud happens when someone intentionally misleads the company for personal benefit. Some examples of fraud include:



Submitting false expense reports

Using company funds to buy things for personal benefit

Using company materials, such as off-specification paint or unused equipment, for personal benefit without permission

Collecting compensation benefits when you are no longer injured or affected by an incident

Whether it's submitting false expense reports or a business partner inflating its hours, fraud harms everyone, from our team members to our company to our clients.

**The Right Way ... to Use Information Technology**

Our information technology (IT) resources and communications systems play a big role in our business, and it is critical that we protect them. When using the company's IT resources and communications systems, be sure to:



- Follow IT security policies, including but not limited to the creation, format, and scheduled changes of passwords
- Use our systems appropriately and primarily

for business purposes

- Never send anything inappropriate through our systems or use our systems for any illegal purpose
- Understand that PPG owns our systems and has the right to monitor the use of our systems (subject to local law) for purposes of protecting our systems and data



**THE RIGHT RESOURCES**

IT Policies

Global Data Governance Policy



# We Work Responsibly With Our Business Partners.




We do business with suppliers, customers, distributors, resellers, agents, consultants, and other third parties who share our ethical standards and values. We maintain an honest, fair, and objective process for selecting our

suppliers and base our purchasing decisions on quality, performance, price, and the supplier's ability to meet PPG's needs. We do not make purchasing decisions based on personal relationships, friendships, gifts, or favors.

## Know Your Role:

- Choose vendors and suppliers that share PPG's ethical standards and values.
- Do not share information provided by one vendor or supplier (e.g., price, terms, or conditions) with another vendor or supplier.
- Ensure competing suppliers have the same information at the same time while bidding on PPG's business.
- Review all the facts impartially and objectively when selecting among competing vendors or suppliers.
- Choose a supplier that will best serve our company's needs and interests, without regard to any personal relationships or personal interest.

**The Right Way ... to Work With Our**

**Business Partners**



We intend to develop and maintain supplier relationships that are fair, ethical, and focused on mutual continuous improvement and a shared responsibility to meet our customer requirements better. It is our responsibility to communicate to our suppliers and other business partners about our commitment to ethical business conduct. We do this by sharing our Supplier Code of

Conduct and/or this Code with all third parties with whom we work and by educating third parties about our standards and values whenever possible. We also show our commitment to this Code by modeling ethical conduct in all aspects of our work.



**The Right Resources**

Supplier Sustainability Policy

Supplier Code of Conduct



# We Understand Political Participation Rules.




PPG supports our right to participate in political activity on our personal time. As a company, however, we must keep our business separate from the political process and

comply with all laws that govern corporate political activity.

## Know Your Role:

- Before using company assets to support a political candidate or political action committee, you must obtain the approval of the most senior manager in your region and notify PPG's Managing Director of Government Affairs. Company assets include your time at work, PPG premises, PPG equipment, and corporate funds.
- Never solicit contributions from your coworkers to support political causes or candidates.
- Be clear that your personal views do not represent the views of PPG.
- If you plan to seek or accept a public office, you must obtain prior approval from your PPG Law and Compliance Department in accordance with applicable laws.

**The Right Way … to Make Political**

**Contributions**



There are laws which may prohibit PPG from making campaign contributions. These laws vary by country and by region and may factor in other circumstances, such as whether PPG is seeking government contracts. Consult your PPG Law and Compliance Department and notify Government Affairs before making any political contributions on behalf of PPG.

## THE RIGHT RESOURCES

Government Affairs Policy



# We Care for Each Other and Our Community.

We protect and beautify the world™




## THE RIGHT WAY, THE PPG WAY

When we care for our community, the environment, and the people around us, we foster a commitment to make the world a better place. PPG will market, distribute, and manufacture products globally in a responsible manner

that protects employees, neighbors, customers, and the environment.

## Know PPG's Role:

- We respect the dignity and human rights of all people, and we comply with all applicable laws pertaining to freedom of association, privacy, collective bargaining, immigration, and working time, wages, and hours. We also follow all applicable laws prohibiting human trafficking, employment discrimination, and forced, compulsory, and child labor.

- We protect the environment around us and understand the importance of reducing our environmental impact.

- We will design, build, and operate our facilities in ways that prevent harm to public health and the environment; conserve energy, water, and raw materials; integrate pollution prevention; and make a positive contribution to the surrounding community and to society as a whole.

- We bring color and brightness to PPG communities around the world by providing financial support to eligible and appropriate charitable organizations across three priority areas: education, community sustainability, and employee engagement. We are proud to support these types of organizations for proper purposes and with strict adherence to our ethical and legal obligations.



**THE RIGHT RESOURCES**

EHS Policy

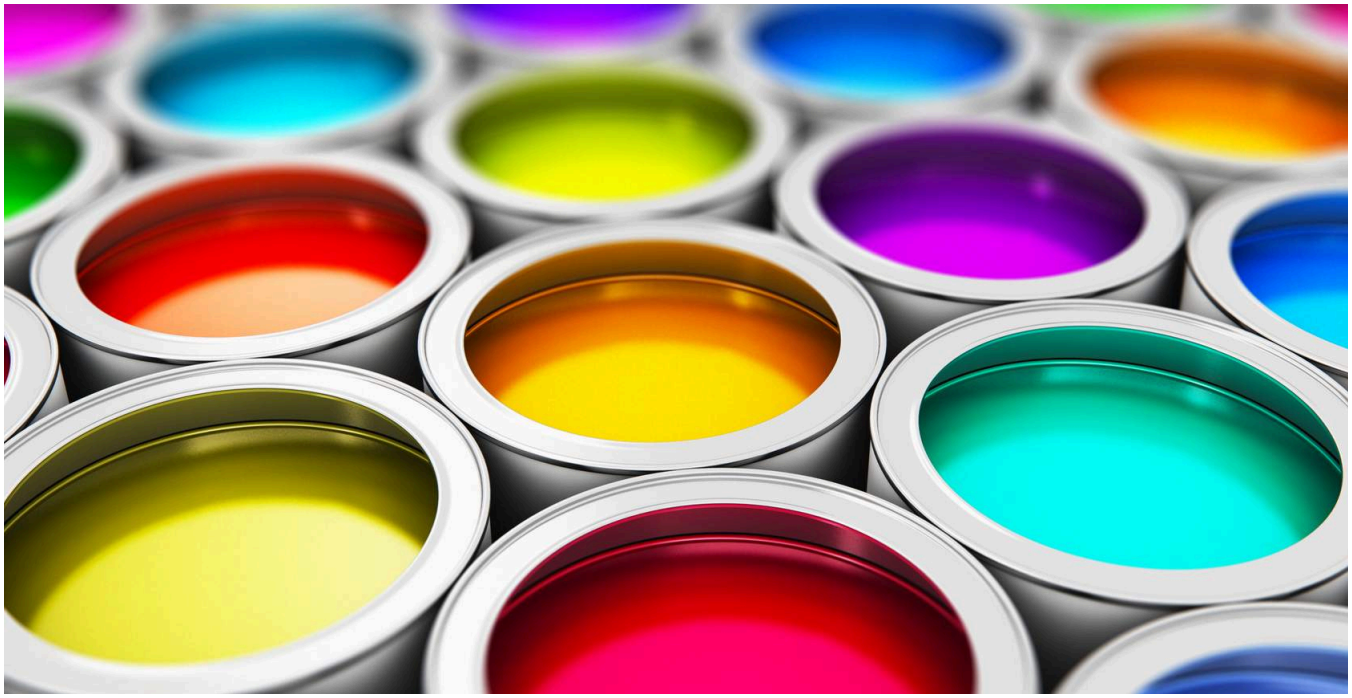
Sustainability Report

Diversity, Equity and Inclusion Report

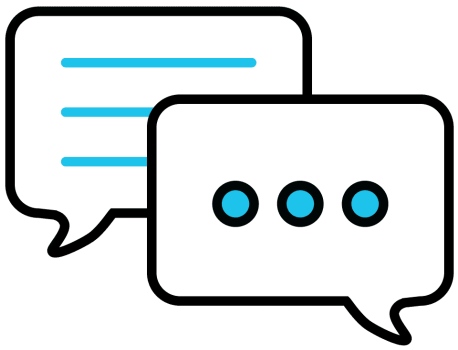


# Conclusion.

We protect and beautify the world™



**We are all here, helping to protect and beautify the world the right way, The PPG Way.** We accomplish this when we act with integrity and in accordance with this Code every day.



**Remember that if you have questions or concerns, we are here to help. Contact any of these resources if you need guidance at any point:**

- Your manager
- Your Human Resources representative
- The Law and Compliance Department
- The PPG Ethics Helpline

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**Waiver Obligation for Directors and Officers:** Any waiver of any provision of the Code for directors or executive officers may be made only by the Board or a Board Committee and must be promptly disclosed to shareholders. Waivers or exceptions to the Code for directors or executive officers will be granted only under unusual circumstances after review by the PPG Board of Directors or a committee of the Board of Directors.





# Download a Printable PDF Version of the Code.

PDF

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