

Code of Ethics for Senior Financial Management

In addition to the ethical obligations set forth in the Company's Code of Conduct and other Company policies, the Chief Executive Officer, Chief Financial Officer and other Senior Financial Management must adhere to the highest standards of honesty, integrity, objectivity and independence, and comply with all applicable laws, governmental regulations, company policies, rules and regulations, ethical requirements and professional standards. The Chief Executive Officer, Chief Financial Officer and Senior Financial Management are also responsible for creating and maintaining a culture of high ethical standards and of commitment to compliance throughout the Company to ensure the fair and timely reporting of Sherwin-Williams' financial results and condition. "Senior Financial Management" shall include the controller, the treasurer, the principal financial/accounting personnel in the Company's operating Groups and Divisions, and all other financial/accounting personnel within the Company's corporate departments and operating Groups and Divisions with staff supervision responsibilities.

The Chief Executive Officer, Chief Financial Officer and Senior Financial Management are bound by the following Code of Ethics for Senior Financial Officers, pursuant to which the Chief Executive Officer, Chief Financial Officer and each person within Senior Financial Management must:

- Act with honesty and integrity, including the ethical handling of any actual or apparent conflicts of interest between personal and professional relationships.
- Avoid actual or apparent conflicts of interest and report any material transaction or relationship that reasonably could be expected to give rise to any such conflict. A conflict of interest occurs when your personal interests interfere in any way, or appear to interfere, with your professional responsibilities or the best interests of the Company.
- Provide full, fair, accurate, timely and understandable disclosure in reports and documents that Sherwin-Williams files with, or submits to, the Securities Exchange Commission and in all other public disclosures and communications.
- Comply with all applicable laws, rules and regulations of federal, state, local and foreign governments, and other appropriate private and public regulatory agencies.

Violations of this Code of Ethics for Senior Financial Officers, including failures to report potential violations by others, may result in disciplinary action, up to and including termination of employment. Any employee who is aware of any act or omission which is or may be a violation of this Code of Ethics for Senior Financial Officers shall promptly report such conduct to the Chief Executive Officer, the Chief Financial Officer, the General Counsel or the Chair of the Audit Committee. Alternatively, an employee may report any such act or omission anonymously using the Ethics Point Helpline.