



H.B. Fuller

H.B. Fuller Company
1200 Willow Lake Boulevard
St. Paul, Minnesota 55110-5101
Office: (651) 236-5900

To: H.B. Fuller Suppliers
From: Rob Hubbard, Director - Global Strategic Sourcing
Re: Supplier Expectations

Dear Valued Supplier,

At H.B. Fuller Company, we take pride in maintaining high standards of ethical conduct and in complying with the wide range of laws and regulations governing our business. We strive to conduct business in ways that bring credit to us, collectively as a company and as individuals within it. H.B. Fuller does business only with partners that also adhere to high standards for ethics and compliance.

We request that you review the [H.B. Fuller Code of Business Conduct](#) and ensure your compliance with the laws and regulations that underpin our Code.

H.B. Fuller's core, minimum expectations for each of its suppliers encompass compliance with laws and regulations in all geographies in which the supplier does business, including but not limited to the following:

Anti-Bribery and Corruption

H.B. Fuller complies with anti-bribery laws wherever we do business and expects the same of our suppliers. Specifically, suppliers must comply with: (a) the provisions of the U.S. Foreign Corrupt Practices Act, which specifically prohibits U.S. companies or their affiliates from making or offering to make any payment to any foreign government official in order to influence such official, to obtain or retain business or to obtain an improper advantage; and (b) international anti-bribery standards (including the U.K. Bribery Act) and local laws that prohibit the offering or receipt of bribes in general commercial practice. The offering, giving or receiving of any bribe, whether directly or indirectly, is prohibited. We expect our suppliers to honor the same commitment.

Gifts and Entertainment

H.B. Fuller prohibits its personnel from offering to or accepting from its suppliers and any of their personnel any gifts and entertainment with the exception of nominal non-cash items and reasonable, non-lavish meals provided in direct connection with business meetings. We expect our suppliers to honor the same commitment in their dealings with H.B. Fuller and its personnel.

Fair Treatment for Workers

H.B. Fuller does not discriminate on basis of race, color, gender, religion, sex, sexual orientation, gender identity, national origin, gender, age, veteran status, or against qualified individuals based on their disability status, and expects the same of its suppliers. Moreover, H.B. Fuller complies with the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a) and 60-741.5(a) for U.S. government contractors and subcontractors and requires covered subcontractors with which it contracts to prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and to prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, or national



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origin. H.B. Fuller also requires that covered subcontractors with which it contracts take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status or disability.

H.B. Fuller does not employ persons younger than the age of 18 unless under the guidance of legally recognized apprenticeship programs within the countries in which the Company operates. We expect our suppliers to honor the same commitment.

H.B. Fuller recognizes the rights of workers to freely associate or not associate with third-party organizations, form and join worker organizations of their choosing or seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. We expect our suppliers to honor the same commitment.

H.B. Fuller does not use any form of forced, bonded, indentured, or prison labor. All work is voluntary and workers are free to leave work or terminate their employment with reasonable notice in adherence to local guidelines. We commit to taking steps to ensure that no slavery or human trafficking is taking place within our organisation or supply chain. We expect our suppliers to honor the same commitment.

Work weeks at H.B. Fuller do not exceed the maximum set by local laws, and we abide with applicable wage laws, including those related to minimum wages, overtime hours and legally mandated benefits within the countries we operate. We expect our suppliers to honor the same commitment.

H.B. Fuller is committed to respecting the personal data of workers and other individuals with whom we may interact. We expect our suppliers to honor the same commitment. Where applicable, suppliers may need to enter into additional “data processing agreements” with us to establish clear rights and obligations regarding the protection of personal data.

Conflict Minerals

H.B. Fuller is committed to ensuring that ‘conflict minerals’ (namely tantalum, tin, tungsten or gold) in any products supplied to it do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. We expect our suppliers to honor the same commitment.

Trade Compliance

H.B. Fuller is committed to full compliance with the import and export control laws of all jurisdictions in which it does business, including U.S. laws that apply to our activities outside of the U.S. It is H.B. Fuller's policy not to do business with the following countries and region, which are currently subject to U.S. sanctions and/or embargoes: **Iran, North Korea, Syria, Cuba, and the Crimea Region of Ukraine.** It is also H.B. Fuller policy to comply with U.S. sanctions against certain individuals, organizations or entities known as “Specially Designated Nationals” (SDNs) or other denied parties lists specified by various countries' laws. We expect our suppliers to honor these same commitments by not providing to H.B. Fuller, directly or



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indirectly, good or services sourced from the listed countries or region or from any SDNs or other denied parties. Additionally, we expect our suppliers to provide in a timely manner all information and documentation required to assure compliance with these laws, to take advantage of special or preferential programs (e.g., free-trade agreements) and to participate in supply chain security programs, as may be requested by H.B. Fuller from time to time.

Sustainability

Fuller recognizes the world's finite resources require us to minimize our impact on the environment while creating value for our customers. To continuously improve our sustainability we focus on:

- * Enabling our customers to improve their products and processes through solutions that help achieve their sustainability goals
- * Optimizing our facilities' operations and process efficiency
- * Engaging our employees to be knowledgeable about and responsible for safety, wellness, and reaching our sustainability targets

We expect our suppliers to help H.B. Fuller achieve its sustainability goals, and to have a policy and/or practices in place to reduce their own environmental impact.

Questions?

If you have questions regarding H.B. Fuller's expectations for suppliers or your company's compliance with these expectations, please email your questions to supplierexpectations@hbfuller.com.

Our Privacy Notice provides details on the information we collect, why we hold it and how we use it, as well as your rights in relation to the information you share with us. We invite you to read our full [Privacy Notice](#) to learn more.