Code of Business Conduct & Ethics

Demonstrating a commitment to reputational excellence across all of our companies through integrity, leadership, teamwork and accountability.

Fortune Brands Home & Security, Inc.
Revised July 29, 2014
Dear Fellow Employees:

At all Fortune Brands Home & Security companies, our commitment to the highest ethical standards guides us in everything we do. Although we conduct business in several home and security segments, it is important that we have a common framework to ensure that our conduct is always aligned with our values. That’s why we all operate under the Fortune Brands Code of Business Conduct & Ethics. The Code applies to every employee at any Fortune Brands company, at every level and in every location.

Our Code has been updated to provide more specific information, but its basic principles and our values remain unchanged. Our Code continues to be a declaration of the highest standards of ethics and integrity in all that we do, uniting all of us with one set of values that guide our daily actions. I ask you to read the Code carefully and refer to it often for guidance. This document contains answers to questions you may have, guidance for resolving issues that may arise and instructions for confidentially reporting any suspected violations of the Code. Amidst the thousands of decisions we collectively make every day, adherence to the Code will ensure that we always make the correct choices.

Thank you for your commitment to Fortune Brands’ high ethical standards. By living up to our Code of Business Conduct & Ethics, we continue on the path to success.

Warmest regards,

Christopher J. Klein
Chief Executive Officer
Fortune Brands Home & Security, Inc.
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3 Ways to Speak Up!

Throughout the Code of Business Conduct & Ethics we offer procedures and guidelines for conduct that applies to everyone who works within the Fortune Brands family of companies, as well as numerous ways to notify us if you believe there has been wrong-doing or misconduct. You can Speak Up! in the following ways by reporting any suspected activities. More details about speaking up and resolving issues can be found on Page three of this document:

Tell Someone

When in doubt about any compliance or ethics issue, please contact your manager or supervisor, your human resources representative, your Compliance Committee or the Fortune Brands Legal Department.

Call the Compliance Helpline
1-855-212-7613
This number is dedicated to receiving reports or concerns of any kind of Code violation, including reports of questionable accounting, bribery or corruption, auditing or fraud related matters or possible violations of federal securities laws affecting the company. Calls can be made anonymously to the helpline. International Toll-Free Dialing Instructions can be found at www.FBHScompliance.com.

Visit the Compliance Helpline Website
www.FBHScompliance.com
This website is dedicated to receiving reports or concerns of any kind of Code violation, including reports of questionable accounting, bribery or corruption, auditing or fraud related matters or possible violations of federal securities laws affecting the company. Reports can be made anonymously. You can also use the site to follow up on an existing report.
Our Commitment to the Code:
Ethical Conduct

The Fortune Brands family of companies are committed to core values that include integrity, leadership, teamwork and accountability. We need to work hard to uphold an excellent reputation and record for doing what’s right. It is important to focus on upholding the highest legal and ethical standards in everything we do, from employment decisions to environmental practices. This Code gives you an introduction to the laws, policies and rules that everyone working at Fortune Brands must follow. We are all expected to understand that:

- the Code applies to all employees in every location (including employees of our operating companies) and the members of the Fortune Brands Board of Directors.

- our supervisors and managers set the example for complying with the Code. They have extra responsibilities to monitor and enforce the Code’s standards as well as to support their employees who have concerns about compliance.

- the choices we make every day impact and reflect on the Fortune Brands companies. If a work-related situation arises that you are uncomfortable with or don’t know how to manage under the principles and spirit of the Code, you must ask for help.

▲ The Code doesn’t describe in detail every law and policy that may apply to you, though it summarizes many of them. Throughout the Code, the blue triangle directs you to additional resources for assistance or more information on Code topics. The Code is available on-line at www.FBHS.com (in the Investor Relations/Corporate Governance Section).

What if…

In the Code, you’ll find examples of complex situations that you might face in making business decisions along with guidance on how to handle that kind of situation. No matter what, you can always contact your manager or supervisor, your human resources representative, your Compliance Committee, the Fortune Brands Legal Department or the compliance helpline for help.
Our Commitment to the Code:
Speaking Up and Resolving Issues

The Fortune Brands family of companies can only respond to problems that are known. It is up to all of us to understand the legal and ethical responsibilities of our jobs and then speak up if we believe someone has violated our standards. We are obligated to seek out guidance when we are involved in, or might become involved in, a situation that is not clear. We must report wrong-doing and ethical misconduct. Doing what is right means:

- promptly reporting possible violations of laws, rules, regulations or the Code to the your manager or supervisor, your human resources representative, the Fortune Brands Legal Department, your Compliance Committee – whichever channel you feel is appropriate. We also have a compliance helpline operated by a third party, independent company to report any kind of Code violation or to express any compliance concerns, including reports of bribery or corruption, financial misconduct, fraud or questionable auditing or accounting practices or possible violations of federal securities laws. Calls made to the helpline may be made anonymously.

- understanding that if you report a Code violation, the company is obligated to investigate your concerns. Calls to the helpline and other reports will be kept as confidential as possible, with information shared on a need-to-know basis in the company, but they cannot be kept secret. Confidentiality will not protect anyone who participates in a violation, and those who violate the Code (or fail to report violations they know about) may be disciplined (including termination of employment) or face legal consequences.

- complying with our “no retaliation” policies. Any employee who truthfully seeks advice, raises a concern or reports misconduct in good faith will not be retaliated against for speaking up. Likewise, an employee will not be retaliated against for cooperating in an investigation of a potential violation. Although individuals who disclose their own misconduct may be penalized for their wrongful actions, no one will be punished for making honest disclosures about suspected Code violations.

What if...

An employee calls into the compliance helpline to report very serious violations of our policy against sexual harassment.

*The helpline call will be promptly investigated. The information provided will be held as confidential as possible, and shared on a need-to-know basis. An employee who reports a violation in good faith will not be retaliated against for speaking up.*

Compliance Helpline
1-855-212-7613
www.FBHScompliance.com

This number and website are dedicated to receiving reports or concerns of any kind of Code violation, including reports of questionable accounting, bribery or corruption, auditing or fraud related matters or possible violations of federal securities laws affecting the company. International Toll-Free Dialing Instructions can be found at www.FBHScompliance.com.
Our Commitment to the Code:
Whistleblower Policy and Procedures

All Fortune Brands companies are committed to conducting business in accordance with the highest ethical standards and complying with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. To that end, Fortune Brands’ Whistleblower Policy and Procedures establishes several ways that an employee may submit a good faith report of questionable accounting or auditing matters or possible violations of the federal securities laws related to the company. An employee may submit a report to the company’s General Counsel, call the compliance helpline or contact a member of the Fortune Brands Audit Committee. Any employee wishing to submit a report shall be free to do so without fear of dismissal or retaliation. The Fortune Brands Audit Committee will review the report and take action as needed, including but not limited to notifying other concerned parties, consulting with the Fortune Brands Board of Directors, and undertaking an investigation.

Neither Fortune Brands nor any employee or agent of Fortune Brands can discharge, demote, or in any manner discriminate against any employee with regard to his or her employment as a result of a report. Fortune Brands strictly prohibits such retaliatory action and will review promptly any complaint of retaliation or other similar behavior. Complaints and investigations will be handled in a confidential manner, consistent with any corrective action that needs to be taken by Fortune Brands.

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The Whistleblower Policy and Procedures is available in the Fortune Brands Legal Department.

What if…

I suspect that my department’s financial reporting procedures may be violating the law. However, I’m afraid I may be fired or demoted if I bring this matter up to a Fortune Brands Audit Committee Member.

There is a no-retaliation clause for employees bringing up good faith reports of suspected accounting or auditing violations relating to the company. You will be protected and you have an obligation to the company to raise this concern.
Our Commitment to the Code:
Compliance Program

The Code is developed and updated by Fortune Brands’ Compliance Committee. The Fortune Brands’ Compliance Committee, along with the Compliance Committee at each operating company, administers our compliance program. The Fortune Brands Compliance Committee meets periodically to review the company’s compliance efforts, and it reports at least yearly to the Board of Directors. It is responsible for:

- overseeing compliance training, communications, auditing and mentoring.
- conducting investigations (with outside resources as needed).
- determining disciplinary procedures for Code violations.
- consulting with the Legal Department for interpretations of the law as it applies to the Code.

Fortune Brands’ senior leadership works with and supports the Compliance Committee and the Compliance Committees of the operating companies to prevent and detect unethical conduct.
Our Workplace:
Respect for Others

All Fortune Brands companies are committed to fostering a workplace that is professional and respectful. Diversity is a necessary and strategic goal for our business. We promote an atmosphere of trust and respect and encourage a work environment where employees are treated fairly and given opportunities to contribute to our success. This means:

- we provide equal employment opportunities to all employees and applicants. All Fortune Brands companies recruit, employ, train, evaluate and promote qualified people for all positions without regard to race, color, religion, sexual orientation, marital status, national origin, citizenship, sex, age, disability, genetics, military or veteran status, or any other basis prohibited by law.

- we do not tolerate any form of harassment. Any unwelcome conduct that creates an offensive or intimidating environment is prohibited. Sexual harassment may include sexual advances, unwanted contact or repeated lewd suggestions or comments. Other forms of harassment may include offensive racial, ethnic, religious, age-related comments and insults or showing hostility towards others because of individual characteristics. Whether this conduct is verbal, physical, or is communicated through pictures or electronically, it is not tolerated.

- if you observe or experience any type of harassment or discrimination, you must report it to your manager or supervisor, your human resources representative, your Compliance Committee, the Fortune Brands Legal Department or the compliance helpline.

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What if…

A co-worker tells you that her supervisor continually mocks her religious beliefs, and has recently sent her an email (which she forwarded to you) with offensive cartoons poking fun at her faith. She is very upset at this behavior, but has insisted to you that she doesn’t want to take action or “rock the boat.” She says she’s only telling you about this problem “as a friend.”

You have an obligation under the Code to encourage your co-worker to report this issue and to make clear that if she does not bring the conduct to the attention of another supervisor, her human resources representative or Fortune Brands Legal Department, the helpline, or her Compliance Committee, you should report it yourself.
Our Workplace:
Health & Safety at All of Our Locations

All Fortune Brands companies are committed to maintaining a safe, secure and healthy work environment. The company conducts its business to comply with the letter and spirit of all occupational safety and health laws. Our goal is to continuously reduce the risks associated with our operations and provide a safe and healthy environment for our employees.

Our policies and practices prohibit possession, sale or use of illegal drugs (or abuse of prescription drugs) while working or on our premises. Anyone suffering from substance abuse problems is urged to contact their human resources representative for help.

Fortune Brands has a zero-tolerance policy for workplace violence. Violence, threats or intimidating behavior will not be tolerated on our company premises or at a company-sponsored event. Employees who experience or witness workplace violence, who witness or receive a complaint about workplace violence or threats or have concerns that a colleague may be subjected to violence should speak up immediately.

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What if...

Please consult your local health and safety policies and workplace violence policy. Employees seeking guidance and assistance with substance abuse or other personal concerns should contact their local human resource representative to learn about potential assistance programs.

A co-worker mentions that she is angry with her supervisor and may “go postal” on him and even suggests that she may bring a weapon to work tomorrow. Should you say something?

Yes. You must report this concern to your manager or supervisor, your human resources representative, your Compliance Committee or the compliance helpline.
Our Workplace:
Employee Confidentiality

All Fortune Brands companies collect personal information about all employees in order to provide compensation and benefits and for other necessary employment records. The company respects its employees’ confidentiality, and access to this information is restricted to authorized people who need to administer employee programs. Those who have access are required to strictly comply with access and privacy rules.

Although our company has a high regard for employees’ privacy, particularly employee information covered by privacy laws, that doesn’t mean that all information and material created or brought to work will remain private. Email and Internet use, in particular, are monitored for appropriate content, and you should not expect privacy in those communications.

Directors, officers and employees should maintain the confidentiality of information entrusted to them by the company or its customers or suppliers, except when disclosure is expressly authorized or legally required. Confidential information includes all non-public information about our customers or suppliers and employees that might be of use to the company’s competitors or harmful to the company or its customers or suppliers if disclosed.

What if…

I received another employee’s explanation of benefits from our insurance company which contained information about recent medical services he received. What should I do with this information?

You should contact your human resources representative immediately so that they can address and resolve the situation. Of course, you should not disclose to anyone else the other employee’s medical information.

Local policies and procedures about electronic mail, social media and internet usage contain more details about computer usage at the Fortune Brands family of companies.
Our Business:
Fair Competition

All Fortune Brands companies pride themselves on leading the marketplace by innovating, performing at the highest levels and competing vigorously. It is critical to our business and our reputation that we compete fairly. This means:

- we comply with fair competition — or “antitrust” — laws that promote marketplace fairness. These laws prohibit restraints on trade, including agreements among competitors to fix prices, to manipulate the volume or availability of products, to allocate territories, markets or products, or to boycott particular suppliers or customers. In many circumstances, it is also illegal to offer discriminatory pricing to competing customers. Because penalties for anticompetitive conduct can be very severe, including huge individual and corporate fines and prison sentences, and because the rules in this area are so complex, the Fortune Brands Legal Department must assist with all antitrust issues.

- we gather and use competitors’ information legally and ethically. We can seek out and rely on publicly available, non-confidential information about competitors’ business practices. It is improper to use others’ proprietary competitive information.

What If...

I receive a fax from my counterpart at Masco that contains all of Masco’s projected financials. The fax coversheet had my name on it, so I guess it was meant to be sent to me, right?

Most likely not. Common sense says this fax was sent in error, and that the information is highly confidential to the sender. Using it would be unfair and improper. Don’t share, copy or discuss the fax. Contact the Fortune Brands Legal Department.
Our Business: Abiding by Global Trade Laws

As a global company, all Fortune Brands companies transfer goods, services and technologies to countries all over the world. The U.S. export laws regulate where and with whom we can do business and where we may transfer goods, services, and technologies. Fortune Brands’ business transactions are subject to various trade controls and laws that regulate exports including government-imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts. Our ability to export product, services and technologies is a privilege, not a right, and the U.S. government can revoke that privilege in event of a violation.

No employee (regardless of location) may conduct business directly or indirectly with any company or individual based or residing in certain prohibited countries. Specifically, transactions with countries subject to U.S. trade embargos are strictly prohibited. The current list of Prohibited Countries include Cuba, Iran, North Korea, Sudan and Syria. Prohibition extends to both direct and indirect transactions with the Prohibited Countries. Thus, no employee may assist in or otherwise support a transaction with a Prohibited Country that the employee could not engage in directly. If U.S. law conflicts with local trade law, U.S. law may apply. Always consult with the Fortune Brands Legal Department for guidance on this subject.

Fortune Brands also cannot conduct business with parties listed on government trade exclusion lists, including the U.S. Denied Persons, Entity and Specially Designated Nationals List.

Fortune Brands is prohibited from participating in boycotts that are not sanctioned by the U.S. government—this includes agreements to discriminate, refusals to do business with certain countries or companies blacklisted by other governments. To ensure compliance with anti-boycott laws, always have the Fortune Brands Legal Department review agreements, transactions that contain potential boycott-related language.

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The Fortune Brands Legal Department distributes to company employees our policy on trade restrictions periodically, with updates as necessary. Contact the Fortune Brands Legal Department for a copy of the policy or to discuss transactions.

What if...

An employee receives a purchase order for a new customer in the UAE. The customer contact says things that suggest the company in the UAE is a wholly owned distributor for an Iranian company, and all product will be shipped immediately from the UAE to Iran. Is this a problem?

Yes. According to federal U.S. law, we are prohibited from doing business with Iran and other restricted countries, whether directly or indirectly. We have an obligation to understand the nature of the business prior to filling the order. If we are indirectly supplying Iran, this transaction is prohibited.
Our Business:
Anti-Corruption

All Fortune Brands companies are committed to conducting business ethically and in compliance with all applicable laws, including the U.S. Foreign Corrupt Practices Act. Fortune Brands strictly prohibits all bribery or any improper payments in any of its operations throughout the world. All employees, regardless of citizenship or location, must not bribe or make improper payments to any person, whether a government official or a private person, and they must not use intermediaries, such as agents, consultants, advisers, distributors or any other business partners to commit such acts.

No payments should ever be offered, directly or indirectly, in any form of a gift, entertainment or anything of value to a government official or his/her representative in order to obtain or retain business, influence a business decision or secure an unfair business advantage. Certain transactions are also prohibited, including “splitting invoicing” or “other invoicing” to reduce taxes or customs duties. All payments must be properly recorded, and never omitted from the books and records.

If you become aware of any potential or actual corrupt arrangement or agreement, you should immediately report it to the Fortune Brands Legal Department or your Compliance Committee.

What if...

While negotiating a contract renewal with a supplier in Country A, you learn that the supplier regularly provides gift cards to inspectors from the local Ministry of Environmental Protection during their visits. Your contact tells you not to worry because gift-giving is a normal part of the business culture in Country A. What should you do?

Inform the Fortune Brands Legal Department or your Compliance Committee as soon as possible. Under both U.S. and local law, a company may be held liable for bribes paid to government officials by third parties, such as suppliers. This liability can arise whether or not the company directed or authorized the third party’s behavior. The supplier in the above scenario could be using “gift cards” to bribe inspectors (i.e., officials) from a government agency. We cannot do business with a partner that pays bribes even if such “gifts” are a normal part of the local culture.
Our Business:
Conflicts of Interest

Within all Fortune Brands companies, we are expected to make objective business decisions that are not influenced by our own personal, social, financial or political interests. Even the appearance of a conflict of interest by any of us might impair our reputation and diminish our strength in the marketplace. It is critical that we base our business choices on merit and fairness, and that we avoid actual or potential conflicts of interest. When in doubt about a possible conflict of interest, it is always best to disclose and discuss the situation with your manager or supervisor. Any employee, officer or director who becomes aware of a conflict or potential conflict must disclose it to the Fortune Brands Legal Department, your human resources representative or the Fortune Brands Conflicts of Interest Committee.

A conflict, or the appearance of a conflict, may exist where:

- you (or people in your household) have a material financial interest in one of Fortune Brands’ competitors or in a company Fortune Brands may acquire. However, you may still invest in publicly traded mutual funds or similar investments with broadly diversified portfolios even if the funds hold stock in Fortune Brands’ competitors or companies Fortune Brands considers acquiring.
- you (or someone in your household or family) have a material financial interest in one of Fortune Brands’ customers, vendors or suppliers.
- you work in any capacity for a Fortune Brands’ competitor.
- you give or accept gifts, favors, entertainment, compensation or special discounts to or from a person or company with whom Fortune Brands does, or may do, business. Modest gifts are probably acceptable as long as they are infrequent. In addition, business-related entertainment costs are acceptable. Any gift you give must comply in all respects with this Code and Fortune Brands’ Conflicts of Interest Policy, Anti-Corruption Policy and Global Citizenship Policy.
- you use Fortune Brands’ resources to promote political activities without advance authorization from the Fortune Brands Legal Department. This includes using Fortune Brands’ name to suggest the company supports a certain candidate or cause.

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The Fortune Brands Legal Department distributes to company employees our Conflicts of Interest periodically, with updates as necessary.

What if…

I already own stock in a company that has recently become one of our suppliers. Do I need to sell this stock?

*Disclose this information to your manager or supervisor. If you work in a purchasing function, you may need to divest yourself from financial interest in the supplier. If you don’t work in a position that affects purchasing decisions, you may not need to sell your shares. In any event, it is important that you disclose and discuss this information with your manager who will work with Fortune Brands’ Conflicts of Interest Committee to determine next steps.*
Our Information and Resources:  
Financial Accuracy and Disclosure

All Fortune Brands companies adhere to strict standards in the keeping of our financial records and accounts. Our books must accurately and fairly reflect all transactions properly, and present facts honestly and in a straight-forward, transparent way.

We will ensure that the disclosures we make to the Securities and Exchange Commission and in other public communications are full, fair, accurate, timely and understandable.

All employees must:

- maintain accurate and timely records of all transactions.
- ensure that business records (for example travel and expense reports, purchase orders and invoices) are honest, complete and not misleading.
- follow all laws, accounting requirements and company procedures for reporting financial and other business information.
- cooperate with and do not take any action that would mislead our internal and external auditors or any unauthorized individual.
- contact the Accounting Department with any questions about the proper recording of financial transactions and comply with the accounting and control policies set forth in the Fortune Brands Accounting Policies Manual.

Any employee, officer, or director who falsifies or conceals information, or undermines our financial controls may be disciplined, including termination of employment, and may face legal action.

Fortune Brands’ CEO and Senior Financial Officers must comply with an additional Code of Ethics for Senior Financial Officers concerning financial reporting, disclosures, conflicts of interest and accurate accounting. A copy of the Code of Ethics for the CEO and Senior Financial Officers may be found on the company’s website at www.FBHS.com (at the Investor Relations/Corporate Governance section).

You must report any concerns or complaints about questionable accounting or auditing practices by raising issues with our finance group or audit department. If you still have concerns, you should call the compliance helpline, or contact a member of Fortune Brands’ Audit Committee.

What if…

It is the last week in the annual reporting period. My manager wants me to hold back on submitting expense reports until next quarter. Should I do what she says?

No. All revenues and costs must be recorded in the correct time periods. The expenses must be reflected on our books this quarter.
Our Information and Resources:
Insider Trading

Securities laws prohibit the sale, purchase or other transactions involving company stock while in possession of undisclosed material information. This conduct is known as “insider-trading.”

“Material information” is information about a company that, if it were publicly known, would affect the market value of the company’s stock or influence investor decisions about that stock.

Anyone with undisclosed material information about Fortune Brands must not purchase, sell or give recommendations (“tips”) to others to purchase or sell shares in Fortune Brands stock. Insider trading is grounds for disciplinary action not only because it violates the Code and Fortune Brands’ Insider Trading and Undisclosed Material Information Policy, but also because it is against the law and can result in severe civil and criminal penalties.

Many of us work every day with information about Fortune Brands and outside companies that is considered material, including information about acquisitions and divestitures, changes in senior management, major new projects or products, unexpected changes in financial conditions, and significant litigation. If you have material information:

- you must not discuss it, even casually, with friends, family or outsiders. You shouldn’t share the information with co-workers if they don’t have a business reason to know.

- you must wait to trade securities until the information is made public and you have authorization to trade from the Fortune Brands Legal Department.

Members of the Fortune Brands Board of Directors and certain employees may be subject to blackout periods and may also be required to obtain approval from the Fortune Brands Legal Department prior to engaging in any transaction in Fortune Brands stock. The Fortune Brands Board of Directors and certain employees may also be subject to SEC reporting requirements. These restrictions and requirements are described in the Fortune Brands’ Insider Trading and Undisclosed Material Information Policy.

Contact the Fortune Brands Legal Department to discuss insider trading questions and concerns.

What if...

I know that next week Fortune Brands will announce an acquisition that adds considerably to our business. It’s all been very hush-hush so far, but I helped review some of the due diligence materials. I was going to re-allocate some of my retirement savings into Fortune Brands stock anyway, can I still do it tomorrow?

No. You have inside information, and purchasing Fortune Brands stock through your 401(k) or in any other way is illegal at this time.
Our Information and Resources:  
Company Property at All Locations

All Fortune Brands companies require its employees to protect and to use company property appropriately. We are not permitted to take for our personal use (or to give or loan to others) any company-owned materials or items without consent from our managers.

Like all company property, the company’s computer technology is to be used for legitimate business purposes, and security must be protected at all times. Keep in mind that:

- excessive personal use of email, the Internet, or other electronic communication is not permitted. Personal use must be limited, and must not impact your work productivity.
- creating, accessing or transmitting any information that is offensive, vulgar, harassing or illegal is not permitted.
- communications by email or Internet should not be considered private.
- any use that may be against Fortune Brands’ interests is prohibited.

What if…

I lead my son’s scout troop, and need to photocopy a lot and call or email other parents. I need to do this at work most of the time. Also, for our annual fundraiser, I’d like to put together goodie bags with backpack locks and Fortune Brands water bottles. Does the company allow this?

The Code does not permit excessive personal use of our electronic technology or equipment. Also, we expect that when you are at work, you’re devoting your time and attention to our business. Discuss whether your day-to-day volunteering or outside work is appropriate with your manager. If it decreases your productivity and regularly distracts you from your tasks, the amount of time you spend doing volunteering or outside work is probably too much under the Code. You may only use equipment and give away its products with consent from the Contributions Committee and in compliance with Fortune Brands’ Anti-Corruption Policy.
Our Information and Resources:  
Investor and Media Relations

Fortune Brands' corporate office provides information to investors, analysts, shareholders and the media in an accurate, timely and professional manner. It is critical that the information we share is reliable and consistent. We do not discuss many matters, including new products, acquisitions, divestitures, employment issues, and lawsuits until the appropriate time, and then only our designated spokespeople should provide information. Serious civil and criminal penalties can be associated with making false, fraudulent or misleading statements to the government and others.

If you're contacted by a member of the press, the investment community or by anyone else seeking information or opinions about Fortune Brands, you must notify the Vice President of Investor Relations and Corporate Communications and let him respond.

To protect the integrity of company information:

- only those employees specifically authorized to do so may respond to inquiries from members of the investment community (e.g., shareholders, brokers, investment analysts, etc.). All such inquiries must be forwarded promptly to the Investor Relations function.

- media or press calls require careful consideration. No employee should talk about company matters with a reporter, either on or off the record, without first contacting the Vice President of Investor Relations and Corporate Communications.

What if...

If you are approached by the media to comment on any Fortune Brands matter, contact the Fortune Brands Investor Relations and Corporate Communications leadership.

A local newspaper reporter calls me and asks me questions about the company for an upcoming article.

Transfer the telephone call to the Fortune Brands Investor Relations and Corporate Communications leadership. Do not provide any information to the reporter.
Our Information and Resources:
Records Management

All Fortune Brands companies must manage all records and documents accurately and legally. Many documents must be kept or disposed of according to legal requirements. In light of pending litigation, documents (both hard copy and electronic) must often be “held” and not altered, deleted or destroyed. We all must comply with our Records Retention Manual and with any other information retention instructions we receive.

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Local policies and procedures about records management contain more details about records management at the Fortune Brands family of companies. Contact the Fortune Brands Legal Department if you have any specific questions about the retention period of a document, or if you have any questions concerning documents referred to in a legal hold notification. Destruction of documents subject to a legal hold notice, even inadvertently, could expose us to liability.

What if…

I often do work on my home computer so I have many old drafts of company documents saved there. The company does not own my home computer, so do I really have to delete old documents on my home computer?

Even though the company does not own your home computer, our retention policies cover company documents you create on your home computer, and requires you to treat those documents the same way you are required to treat documents on your work computer.
Corporate Citizenship: Environmental Concerns

All Fortune Brands companies conduct business to comply with the letter and spirit of all environmental protection laws. Our goal is to continuously reduce the impact of our operations and products on the environment. Fortune Brands is committed to promoting environmental practices and products that protect the environment while enhancing the lives of our employees, our customers and our communities. The principles under which we operate are set forth in our Statement of Environmental Stewardship and Sustainability.

Fortune Brands’ Statement of Environmental Stewardship and Sustainability is available online at www.FBHS.com (in the Corporate Responsibility Section).
Corporate Citizenship: 
Global Concerns

Fortune Brands family of companies operate globally and strive to develop and foster international business relationships built on respect and responsibility. The principles under which we operate are set forth in our Global Citizenship Policy. The company is committed to complying with national and local laws of the countries in which we do business, and having our suppliers also comply. In addition, some requirements of the Global Citizenship Policy may be more stringent than local law or customs, and in that event, we must comply with our rules. For example:

- Fortune Brands companies do not permit child labor. All workers must exceed the local minimum age law requirements, and must be over 15 years old, and in some instances, depending on the type of work, workers must be over 18.

- Fortune Brands companies prohibit engaging in or supporting discrimination, harassment, or corruption in the workplace.

- Fortune Brands companies limit working hours, complying with all applicable local laws and industry standards on working hours; however, employees must not work more than 12 hours a day, six days a week for more than three consecutive weeks.

- Suppliers and contractors are selected, and then monitored, based on compliance with our global citizenship requirements.

What if...

I became aware of substandard working conditions at one of our suppliers. Am I supposed to tell anyone about this?

Suppliers must comply with our Fortune Brands Global Citizenship Policy. Notify the Fortune Brands Legal Department for investigation and corrective action.
Training and Certification

We take our commitment to ethical standards very seriously. Please take the time to read and understand the Code. You will periodically receive training, primarily web-based, on the Code. After you complete the training, you will be asked to certify that:

- you have read and understand the Code, and will comply with the Code.
- you understand that you all have an important role to play in speaking up and resolving issues. You are encouraged and required to report activities, which you in good faith believe are or may be violations of the Code.
- you understand that if you violate the Code, fail to report a violation or retaliate against another employee for his or her action in reporting a violation that you may be disciplined, which might include termination of your employment, or face legal consequences.

Waivers of the Code

The Audit Committee (in the case of a violation by a director or officer) and the Fortune Brands Legal Department (in the case of a violation by any other person) may, in its discretion, waive any violation of the Code. Any waiver for a director or officer shall be disclosed as required by NYSE and SEC rules.

Compliance Reporting Summary

We all must comply with the law and the terms and spirit of this Code. When in doubt about any compliance or ethics issue, please contact your manager or supervisor, your human resources representative, your Compliance Committee or the Fortune Brands Legal Department.

Compliance Helpline: 1-855-212-7613

Compliance Website: www.FBHScompliance.com

This number and website are for all compliance reporting, including reports or concerns regarding questionable accounting, auditing or fraud related matters affecting the company and is available domestically. The phone number and website may be accessed anonymously on a 24-hour basis.

International Toll-Free Dialing Instructions can be found at www.FBHScompliance.com.

The Code is not a contract. It does not convey any specific rights or guarantee employment for any specific period of time. Instead, it describes the ethical conduct expects from all of us within all Fortune Brands companies.