Fortune Brands Innovations

Code of Business Conduct & Ethics

Demonstrating a commitment to reputational excellence across Fortune Brands Innovations through integrity, leadership, teamwork and accountability.

Fortune Brands Innovations, Inc.

Updated April 2023

Fortune Brands Innovations

To Our Valued Associates,

At Fortune Brands, we are committed to the highest ethical standards. No matter where you work, you are part of Fortune Brands. We have a single Code of Business Conduct and Ethics that applies to every associate at every level and in every location. Our core behaviors are reflected throughout the Code, and guide our beliefs and behaviors for how we conduct business and treat others.

I ask you to read the Code carefully and refer to it as needed. You will find answers to questions, guidance for resolving issues that may arise and instructions for confidentially reporting any suspected violations of the Code. Amidst the thousands of choices, we collectively make every day, adherence to the Code will ensure that we always make the right ones.

OUR BEHAVIORS:

- **Think Big, Learn Fast**
- **Work It Together**
- **Make the Hard Call**

Thank you for your commitment to Fortune Brands and our behaviors. By living up to our Code of Business Conduct & Ethics, we continue to build a great company.

Regards,



Jesse Singh
Chief Executive Officer
Fortune Brands Innovations, Inc.

Table of Contents

3 Ways to Speak Up! 1
Our Commitment to the Code: 2

Ethical Conduct 2
Speaking Up and Resolving Issues 3
Whistleblower Policy and Procedures 4
Compliance Program 5

Our Workplace: 6

Respect for Others 6
Health & Safety at All of Our Locations 7

Our Business: 8

Fair Competition 8
Abiding by Global Trade Laws 9
Anti-Corruption 10
Conflicts of Interest 11
Gifts, Entertainment, and Hospitality 12
Using Social Media 13

Our Information and Resources: 14

Financial Accuracy and Disclosure 14
Insider Trading 15
Company Assets 16
Confidential Information 17
Data Privacy 18
Investor and Media Relations 19
Records Management 20
Environmental Concerns 21
Human Rights 22

Training and Certification 23
Failure to Comply with the Code 23
Waivers of the Code 23
Compliance Reporting Summary 23

References in this Code of Conduct to "Fortune Brands," the "Company," "FBIN," "we," "our," or "us" refer to Fortune Brands Innovations, Inc. and its subsidiaries.

3 Ways to Speak Up!

The Code of Business Conduct & Ethics contains guidelines for conduct that apply to everyone who works within Fortune Brands and 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 violation of the Code. 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, the 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.FBINcompliance.com.



Visit the Compliance Helpline Website
www.FBINcompliance.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

Fortune Brands is 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 subsidiaries) 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 everyday 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 online at www.FBIN.com.

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

Fortune Brands 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 your manager or supervisor, your human resources representative, the Fortune Brands Legal Department, or your Compliance Committee – whichever channel you feel is appropriate. We also have a compliance helpline operated by an independent third-party company through which you can report any kind of Code violation or express any compliance concerns, including reports of bribery or corruption, financial misconduct, fraud or questionable accounting practices or possible violations of federal securities laws. Calls 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. No one will be punished for making honest disclosures about suspected Code violations.

▲

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

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.

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 you may submit a good faith report of questionable accounting or auditing matters or possible violations of the federal securities laws related to the Company. You may submit such a report through the compliance helpline. You may also raise the matter to your manager or supervisor, your human resources representative, your Compliance Committee or anyone in the Fortune Brands Legal Department. Any employee wishing to submit a report shall be free to do so without fear of dismissal or retaliation. The Fortune Brands Compliance Committee will review the report and take action as needed, including but not limited to notifying other concerned parties 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 making such 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 as confidentially as possible, consistent with any corrective action that needs to be taken by Fortune Brands.

▲

The Whistleblower Policy and Procedures is available online at www.FBIN.com.

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 through the compliance helpline.

Fortune Brands prohibits retaliation against an employee for making good faith reports of suspected accounting or auditing violations relating to the Company. You will not experience retaliation for bringing this matter up. Moreover, 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 subsidiary, 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; and
- 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 subsidiaries to prevent and detect unethical conduct.

Our Workplace:
Respect for Others

Fortune Brands is 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, gender identity or expression, 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.

▲

Please consult your local anti-harassment and non-discrimination policies that describe these rules and obligations in more detail.

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 a manager or supervisor, her human resources representative, the Fortune Brands Legal Department, the helpline, or her Compliance Committee, you must report it yourself.

Our Workplace:
Health & Safety at All of Our Locations

Fortune Brands is 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.

▲

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.

What if...

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, the Compliance Committee or the compliance helpline.

Our Business:
Fair Competition

At Fortune Brands, we take pride in how we are 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. Because penalties for anticompetitive conduct can be very severe, including large 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 received an e-mail from my counterpart at Masco with an attachment that contains all of Masco's projected financials. The e-mail was addressed to me, so I guess it was meant to be sent to me, right?

Most likely not. Common sense says this e-mail 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 e-mail or attachment. Contact the Fortune Brands Legal Department.

Our Business:
Abiding by Global Trade Laws

As a global company, Fortune Brands transfers 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. This 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 and for a current list of Prohibited Countries.

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, the Fortune Brands Legal Department should review any agreements that contain potential boycott-related language.

Contact the Fortune Brands Legal Department to discuss any questions related to trade restrictions.

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 products 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. You should contact the Fortune Brands Legal Department to discuss the transaction before proceeding.

Our Business:
Anti-Corruption

Fortune Brands is 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. 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, or if you were approached by someone requesting an improper payment, you must immediately report it to the Fortune Brands Legal Department or your Compliance Committee.

▲

The Company's Anti-Corruption Compliance Policy is available online at www.FBIN.com. If you are unsure whether you might be dealing with a government official or have any questions about complying with the Anti-Corruption Compliance Policy, you should contact 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 providing gifts or other things of value that might be viewed as bribes 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 Fortune Brands, 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 your manager or supervisor, your human resources representative, your Compliance Committee, or the Fortune Brands Legal Department.
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. See the Gifts, Entertainment & Hospitality section below for more information.
- 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.

▲

Fortune Brands Innovations, Inc.'s Conflicts of Interest policy is available online where other Company policies are posted.

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 Business:
Gifts, Entertainment, and Hospitality

Exchanging gifts and providing entertainment or hospitality can be part of building and cultivating business relationships. However, they can also be viewed as a bribe or pose a conflict of interest when they make it hard for someone to be objective about the person or company that provides them. It is important that any gift, entertainment or hospitality provided comply with the law, this Code and Fortune Brands' Conflicts of Interest Policy and Anti-Corruption Policy.

You can provide gifts, entertainment or hospitality to employees or others only if they are insignificant in value, are not given in consideration or expectation of any return action by the recipient, and do not create an appearance of impropriety. (See the Anti-Corruption section above for more information on gifts or entertainment to government officials.)

You should only accept gifts, entertainment or hospitality from a customer, supplier or other third party doing or seeking to do business with any Fortune Brands company that are of insignificant value and received for a legitimate business purpose. Any gifts or entertainment that are not of insignificant value should be returned immediately and reported to your manager or supervisor. If immediate return is not practical, contact the Legal Department for guidance.

Finally, use common sense and moderation when you engage in business entertainment or otherwise provide some form of hospitality on behalf of the Company. Any business entertainment provided to or accepted from anyone doing business with the Company as a third party must be limited to entertainment that is infrequent, modest, and intended to serve legitimate business goals, with no expectation of, or actual, reciprocal action.

As you consider whether business entertainment or hospitality is insignificant in value, think about what you would be willing to spend personally if you were eating a normal meal out or attending a normal sporting event. Please contact the Legal Department if you are not sure whether the contemplated gift, entertainment or hospitality is of insignificant value or otherwise appropriate.

▲

The Fortune Brands Innovations, Inc.'s Conflicts of Interest policy is available online where other Company policies are posted.

What if...

A vendor I routinely work with has invited me and my spouse to dinner. Can I accept the offer?

If your business contact at the vendor will be attending dinner with you, the restaurant is not extravagant, and business matters will be discussed, accepting this invitation is unlikely to violate the Conflicts of Interest Policy, provided that the dinner is not excessive in value and the vendor's dinner invitations are not too frequent.

Our Business:
Using Social Media

The internet provides unique opportunities to participate in interactive discussions and share information using a wide variety of social media. However, your use of social media can pose risks to FBIN' confidential and proprietary information, reputation, and brands and can jeopardize the Company's compliance with business rules and laws.

To minimize these risks and to ensure that the Company's IT resources and communications systems are used appropriately, FBIN expects you to adhere to the following guidelines regarding social media use.

- Do not violate FBIN's Policies. Social media should never be used in a way that violates any FBIN policy. For example, you are prohibited from using social media to engage in unlawful harassment, circumvent policies prohibiting unlawful discrimination, or violate this Code of Conduct.
- Respect Confidential Information. FBIN's Confidential Information Policy and this Code of Conduct restrict your use and disclosure of the Company's trade secrets and confidential information. Treat the Company's trade secrets and information about FBIN's business, customers and products as confidential and not do anything to jeopardize or unwittingly disclose them through your use of social media.
- Protect FBIN's Business and Reputation. Do not misrepresent yourself or the Company or speak on behalf of the Company.
- Be Respectful. You are responsible for the content of your posts. Use good judgment and remember that anything you say can reflect on FBIN. Avoid harassing, defamatory or disparaging content. Remember that internet content can live forever.

Our Information and Resources:
Financial Accuracy and Disclosure

Fortune Brands adheres 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 other authorized individual.
- Contact the Accounting Department with any questions about the proper recording of financial transactions.

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 the CEO and 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.FBIN.com.

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' Legal Department.

What if...

It is the last week of 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 period. The expenses must be reflected on our books this quarter. You should also report your manager's request to your human resources representative, your Compliance Committee, the Fortune Brands Legal Department or the compliance helpline.

Our Information and Resources:
Insider Trading

Securities laws prohibit the sale and purchase of company stock while in possession of material nonpublic information. This conduct is known as "insider-trading."

"Material information" is information about a company that a reasonable investor would consider important in making an investment decision about whether to buy, sell or hold that stock. Any information that could be expected to affect a company's stock price, whether it is positive or negative, is also considered material information. Material information is considered "nonpublic" if it has not been made available to the public through news, website disclosure or other public disclosures.

Anyone with material nonpublic information about Fortune Brands must not purchase, sell or give recommendations ("tips") to others to purchase or sell shares of Fortune Brands stock. Insider trading is grounds for disciplinary action not only because it violates the Code and Fortune Brands' Insider Trading Policy, but also because it is against the law and can result in 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 the market has absorbed the information.

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 relating to their changes in stock ownership. These restrictions and requirements are described in the Fortune Brands' Insider Trading 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 important acquisition. 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 Assets

Fortune Brands requires employees to protect and use company assets 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.
- Cybersecurity has become an important component of keeping our employees and our Company assets safe. With the general increase in cyber threats and growing sophistication of cyber-attacks, protecting our digital assets and confidential information is critical to ensuring our continued business success. If you see something that doesn't seem right…**Stop** before you take action…**Think** about how your actions could help or hurt, and…**Connect** by informing your Information Technology department of the potential problem.

▲

Refer to the FBIN – Acceptable Use Policy, available electronically where other Company policies are posted, for more information about the appropriate use of Fortune Brands' IT Systems and Company Data. Local policies and procedures about electronic mail, social media and internet usage may also contain more details about computer usage at Fortune Brands.

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.

Our Information and Resources:
Confidential Information

Many Fortune Brands employees have access to confidential information related to Fortune Brands' business. Confidential information is one type of company asset. The Company devotes significant resources to developing much of this competitively sensitive information and materials and relies on each of you to protect it from disclosure or improper use. Protecting our confidential information helps protect our competitive advantage. Examples of confidential information include information concerning finances, supply and service, marketing, customers (including lists), operations, research and development, business and financial plans and strategies, business development projects and product costs, sourcing and pricing.

Only access confidential information that is necessary to perform your job. Do not disclose confidential information to those who do not have a legitimate Fortune Brands related business need to know. Use confidential information only for a legitimate Fortune Brands related business purpose.

If you leave Fortune Brands, don't share the Company's confidential information with your new employer or use it for the benefit of your new employer. Likewise, if you join Fortune Brands from a competitor, we expect you to honor your obligation to protect that company's confidential information.

What if...

One of my former colleagues asked me to send him a cost projection spreadsheet he prepared while he worked at FBIN. He explains that he would like to use it as an example of his work product during an interview for a promotion at his new employer. Should I send it to him?

No. The spreadsheet contains confidential cost projection information that should only be used for legitimate Fortune Brands business and should not be disclosed.

Our Information and Resources:
Data Privacy

Our employees, customers, vendors, suppliers and partners trust us with their personal information. We are committed to handling their personal information with care. Moreover, the collection, use, storage and transfer of personal information is subject to increasingly robust regulations in the United States and in other countries. Fortune Brands is committed to complying with all applicable data protection and privacy laws in the countries where we operate.

Personal information is information that could be used directly or indirectly when combined with other information to identify a person, such as name, e-mail address, phone number, device identifier, or IP Address. You should carefully protect all personal information you acquire or have access to and ensure that you understand and follow the policies that govern the collection, use, storage and transfer of personal information.

If you know or suspect that the security, confidentiality or integrity of another's personal information has been compromised, you must report it to your manager or supervisor, your human resources representative, your local Information Security Manager or your local Information Technology department.

▲

Refer to the FBIN – Enterprise Privacy Policy, which is available online where other Company policies are posted, for more information. If you have any questions about the appropriate protections for personal information, please ask the Fortune Brands Legal Department.

What if...

I have been asked to prepare a report that contains personal information related to certain employees and e-mail the report to a colleague. It is not clear in which countries these employees work or how the information will be used by my colleague.

Notify your supervisor or manager of the request and suggest referral to the Legal Department for consideration of appropriate next steps.

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 Fortune Brands Investor Relations and Corporate Communications function and let them 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 Fortune Brands Investor Relations and Corporate Communications functions.

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

What if…

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

Explain that you are not authorized to speak on behalf of the Company, but that you will pass on the reporter's contact information to Fortune Brands Investor Relations and Corporate Communications departments. Notify the Investor Relations and Corporate Communications functions of the telephone call. Do not provide any information to the reporter.

Our Information and Resources:
Records Management

Fortune Brands 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 Policy and with any other information retention instructions we receive.

▲

Local policies and procedures about records management contain more details about records management at Fortune Brands. 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 am identified as someone who may have documents or electronic information related to a pending litigation and receive a legal hold notice?

Preserve all documents and electronic records (including emails), wherever they are located, that are relevant to the lawsuit until further notice from Fortune Brands Legal Department. If you have any questions about what documents and electronic records may be relevant, contact the Fortune Brands Legal Department.

Corporate Citizenship:
Environmental Concerns

Fortune Brands conducts 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 Employee Safety and Environmental Stewardship policy.

▲

The Employee Safety and Environmental Stewardship policy is available online at www.FBIN.com.

Corporate Citizenship:
Human Rights

Fortune Brands companies operate globally and strive to develop and foster international business relationships built on respect and responsibility. As a company, we respect human rights and abide by the employment laws in all geographies in which we operate. We support the principles established under the United Nations Universal Declaration of Human Rights.

Fortune Brands also takes issues relating to human rights and labor practices in our supply chain seriously. Our Supplier Code of Conduct establishes clear expectations of our suppliers to respect internationally recognized human rights, comply with all applicable laws and conduct their business in an ethical and responsible manner.

For example, consistent with our Human Rights Policy and our Supplier Code of Conduct:

- Fortune Brands does not permit underage labor. All workers must exceed the local minimum age law requirements.
- Fortune Brands prohibits engaging in or supporting discrimination, harassment, or corruption in the workplace.
- Fortune Brands limits working hours, complying with all applicable local laws and industry standards regarding working hours.

▲

Fortune Brands' ethical requirements for doing business are contained in the Fortune Brands Human Rights Policy and Supplier Code of Conduct, which are available online at www.FBIN.com.

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 Supplier Code of Conduct. Notify the Fortune Brands Legal Department about the potential substandard working conditions 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.

Failure to Comply with the Code

Failure to comply with this Code will result in disciplinary action including, but not limited to, reprimands, warnings, probation, suspension without pay, demotions, reductions in salary, and dismissal. Certain violations of this Code may require the Company to refer the matter to law enforcement authorities for investigation or prosecution. Any supervisor or manager who directs, approves, or ignores any conduct in violation of this Code, or who has knowledge of such conduct and does not immediately report it, will also be subject to disciplinary action, up to and including dismissal.

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 will 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, the Fortune Brands Legal Department or the compliance helpline:

Compliance Helpline: 1-855-212-7613 **Compliance Website: www.FBINcompliance.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 globally. The phone number and website may be accessed anonymously on a 24-hour basis.

International Toll-Free Dialing Instructions can be found at **www.FBINcompliance.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.