



H.B. Fuller

Connecting what matters.™

Winning the Right Way
Code of Business Conduct

DEAR EMPLOYEES:

Acting with integrity and doing the right thing in all of our business practices is fundamental to H.B. Fuller's philosophy of winning the right way. Our unwavering commitment to maintaining the highest standards for ethics, citizenship, corporate responsibility and governance drives our success, and results in the best customers, the best suppliers and the best people wanting to work with us.

As a leading global company, we have an obligation to comply with the wide range of laws and regulations governing our business around the world. Holding ourselves to the highest standard ensures that we follow the right path in every location where we operate.

Our commitment is only as strong as the employees who uphold it. The daily actions of our employees ultimately define who we are as a company, so each of us must take responsibility for complying with our Code of Business Conduct. This Code explains our principles, summarizes our core policies and provides a framework for making ethical decisions.

I am counting on you to protect and strengthen our reputation by living our values and committing to the Code's high standards, now and in the future.

Sincerely,



Celeste Mastin
President and Chief Executive Officer



Celeste Mastin
President and Chief
Executive Officer

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Introduction to Our Code of Business Conduct

At H.B. Fuller, we are focused on connecting what matters by developing and manufacturing solutions that address our customers' toughest adhesive challenges. Our customers don't just demand that we deliver new solutions, but that we also win the right way. Doing so means that we operate our business with the highest integrity.

What is winning the right way? Among other things, it's:

- Developing cutting-edge solutions that help our customers improve their products and processes
- Operating our business with a focus on quality, environmental stewardship and sustainability
- Investing in STEM (science, technology, engineering and math) education and youth leadership development programs
- Treating co-workers with respect
- Conducting ourselves in accordance with the law in the global communities where we do business
- Using social media responsibly and appropriately

Winning the right way doesn't just apply to company-wide initiatives. Our goal as employees should be to win the right way daily – in every interaction we have in the workplace – with our customers, with our peers and in our communities.

This Code is designed to help you win the right way. It's a guide, an instruction manual and a reference. It's designed to be a resource for every H.B. Fuller employee. We expect you to read it, study it and refer back to it.

The Code states the broad standards established by H.B. Fuller's management and Board of Directors to govern the conduct of the business worldwide. Detailed Global Core Policies also have been adopted to ensure compliance with the standards articulated by the Code. Other policies may be adopted as necessary by business units, geographic management and functional groups of the company, to the extent such policies are consistent with this Code and the Core Policies. The Core Policies are approved by the Business Ethics and Compliance Committee and are referenced in this document. You may find them on Collaborate or on the home page of our [Ethics Portal](#) under "Ethics and Compliance."

A violation of this Code or the Core Policies will result in company discipline, up to and including termination of your employment.



Introduction to Our Code of Business Conduct

OUR BELIEFS

We embrace a shared set of ideals that directs the way we operate, ensuring that our success reflects a coherent vision for a better world.

We believe in the:

ESSENCE OF COURAGE POWER OF COLLABORATION SPIRIT OF WINNING

- By prizing leadership, acting with integrity and holding ourselves accountable for our actions, we embrace the **Essence of Courage**.
- By valuing our global team’s diverse perspectives, backgrounds and experiences, we foster the **Power of Collaboration**.
- By making a daily, conscious choice to excel, by always bringing passion and creativity to our work, and by striving for innovation ethically and fairly, we embody the **Spirit of Winning**.

Living these core values helps make us more consistent, collaborative and coherent as a company. It helps us focus our mission and elevate our success. It allows us to continue delivering outstanding product offerings to our customers and superior results for our shareholders.

The Code is divided into three sections. *Embracing the Essence of Courage* covers topics related to integrity and accountability, including bribery and corruption, conflicts of interests and environmental safety. *Fostering the Power of Collaboration* covers team issues, like how to prevent harassment and discrimination, how to create an inclusive environment for a diverse workforce and how to conduct oneself on social media. *Embodying the Spirit of Winning* addresses honest business practices, such as data protection, records retention and insider trading.

Within each section, you will learn:

HOW WE CONNECT WITH OUR VALUES

A short statement summarizing the essence of our approach to the topic in question.

WHY IT MATTERS

An explanation of why conducting ourselves according to our values and the principles outlined in the Code is important for H.B. Fuller’s partners, reputation and long-term health as a company.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

A practical guide for putting the company’s values into action. Where appropriate, you also will find a question-and-answer (Q/A) scenario to help bring the Code to life.



Winning as a Team

We've built our reputation on a foundation of dependability and trust. We earn that trust by making sure that each of our actions and behaviors is always in line with our company's values, beliefs and policies, as outlined in the Code.

Our Responsibilities

We want to win ... the right way. Broadly speaking, winning the right way means that all employees should:

- Treat everyone – fellow employees, partners, customers, government officials and members of the community – with courtesy and respect.
- Act with integrity at all times.
- Focus on the customer.
- Be accountable for our actions and decisions.
- Follow the law and all company policies.
- Use sound judgment.
- Ask questions and seek help if we're unsure about something.
- Report misconduct or wrongdoing when we see it.

Responsibilities of Leaders and Managers

This Code governs all H.B. Fuller employees. Leaders and managers have additional responsibilities to:

- Set clear expectations for team members.
- Provide regular performance reviews of employee work and progress.
- Promote a healthy, inclusive and positive working environment.
- Model behavior in accordance with the company's mission, values and beliefs.
- Encourage employees to speak up when they have concerns. Take those concerns seriously, ensuring all issues are handled properly and promptly.
- Train new employees thoroughly and in accordance with the company's policies, as outlined in the Code.
- Be the first point of contact for any employee in need of guidance, advice or instruction.
- Identify and address ethics and compliance issues, should they arise, as outlined in the Code.
- Escalate any significant ethics and compliance issues to the H.B. Fuller Law Department via [HBFPATH](#).



Speaking Up, Reporting Concerns and Getting Help

Transparency is a key part of our company’s culture. In our dealings with one another, we aim to be as open and transparent as possible.

Winning the right way means speaking up about issues that concern you. If something violates the provisions set forth in this Code, or just seems wrong, don’t stay silent – speak up! There are a number of resources at your disposal.

HOW DO I SEEK ADVICE?

A transparent company culture means that concerns can be identified, reported and dealt with before they become problems. If you see something that concerns you, approach your immediate supervisor. With your help, they’ll be able to address the issue from a position of authority – or advise you on steps to take yourself.

HOW DO I REPORT AN ISSUE?

Not all issues are your responsibility to solve. Whether it’s an ethics violation, a workplace safety issue, an instance of harassment or a question about how to interpret a company policy, H.B. Fuller takes your concerns seriously. For any questions or problems, please contact any one of the following:

- Your supervisor or manager
- The Human Resources Department
- The Law Department
- HBFPath, the company’s confidential, secure employee helpline, by calling 1-877-HBF-PATH (1-877-423-7284), in the United States and Canada (for other countries’ numbers go to our [international list](#) of numbers/dialing instructions), or via the web at hbfp.path.ethicspoint.com. Reports may be made anonymously, except where limited by law.
- The Chair of the Audit Committee of the Board of Directors by writing a letter to The Audit Committee of the Board of Directors c/o the Office of the Corporate Secretary, 1200 Willow Lake Boulevard, St. Paul, MN 55110.

WHAT HAPPENS WHEN I MAKE A REPORT?

When you make a report, the company will undertake a prompt and thorough investigation. The investigation will evaluate whether the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem. The company’s findings and recommendations will be promptly reported to the company’s senior management, the company’s Business Ethics and Compliance Committee, and/or the Board of Directors, as appropriate.

WHAT HAPPENS IF WRONGDOING IS FOUND?

If the company determines that conduct in violation of the Code, the Core Policies or applicable laws has occurred, the company will take disciplinary or other corrective actions, as appropriate. The employee reporting the complaint will be notified when the investigation has been completed.

AM I PROTECTED FROM RETALIATION?

Absolutely. Team members making good-faith complaints will not be subject to any retaliatory conduct or threats. Any director, officer or employee who retaliates or who threatens to take any retaliatory action against an employee based upon their reporting or providing information about a concern in good faith will be subject to discipline, up to and including termination.

The company strives to maintain an appropriate level of confidentiality, consistent with the effective investigation of the complaint.



Making Decisions the Right Way

This Code, our Core Policies and our values provide guidance for many of the decisions you will face in your day-to-day work. If you are ever unsure of how to proceed, use these three guidelines to determine the best course of action.



EMBRACING THE ESSENCE OF COURAGE

We have a long history of acting with integrity at H.B. Fuller. Our global customers trust us to operate ethically, and we reward that trust by remaining honest in our business dealings, avoiding bribery and corruption, and prioritizing our customers and company's success over our own personal gain. We also commit to producing high quality, safe products that minimize environmental impact.

This section details how H.B. Fuller employees are expected to act with integrity and remain accountable to themselves and the company's values.



Fighting Against Corruption

HOW WE CONNECT WITH OUR VALUES

In our dealings with our partners, our customers and the governments where we conduct business, we operate solely on the basis of merit. We avoid any interaction that could offer even the appearance of corruption.

WHY IT MATTERS

Our dedication to transparency, honesty and fairness wins trust with our customers and the governments that regulate us. Avoiding corruption and bribery maintains our reputation as an ethical business partner, and allows us to grow and prosper.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embrace the essence of courage when we:

- Refuse to offer, allow or accept bribes of any kind, including:
 - Those involving government officials, their affiliates and family members; and
 - Those involving any business partners, such as kick-back arrangements with customers or vendors (also known as commercial bribery).
- Understand that bribes can take many forms – gifts, charitable donations, political contributions, travel, entertainment, discounts, investment opportunities – and remain on guard against any of them.
- Refuse to do business with third parties whom we suspect will use company resources as a bribe or otherwise engage in corrupt acts on our behalf.
- Do not make “facilitating payments,” which are payments to public officials in exchange for routine governmental actions.
- Record all transactions made to or by the company accurately, completely and honestly.
- Avoid any action or behavior that presents even the appearance of impropriety.
- Keep our social engagements with business partners or customers professional, transparent and honest.

ADDITIONAL INFORMATION

- [Corrupt Practices Core Policy](#)
- [Complete and Accurate Business Records and Communications Core Policy](#)



PAYMENT FOR PAPERS?

Q: I’m working on a project overseas. I’ll need special clearance from the government to visit various work sites, but this government’s bureaucracy is famously slow. The official I’ve been in contact with has informed me that if I pay him a “processing fee,” he can make sure things move more quickly. Is this an appropriate payment to make?

A: No. Paying a government official to speed up or secure the performance of a routine governmental action, such as obtaining permits or licenses, processing paperwork, including visas, or providing routine government services is defined as a “facilitating payment.” These types of payments are barred by the Code and the Anti-Bribery and Anti-Corruption Core Policy, as well as by law in certain countries.



Giving and Receiving Gifts

HOW WE CONNECT WITH OUR VALUES

As part of our commitment to integrity and our efforts to combat corruption, we strive to keep gifts, entertainment and charitable giving legitimate, documented and within the bounds of acceptable business practices and the law.

WHY IT MATTERS

While we recognize and appreciate the cultural and social importance of gift giving, we also strive to do business on our own merits and are actively opposed to bribery, corruption and pay-for-play arrangements. In our dealings with customers and public officials, we make every effort to avoid even the appearance of corruption by never giving or accepting anything more than nominal gifts.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embrace the essence of courage when we:

- Remember that entertainment and meals are, legally speaking, gifts and assure that any entertainment or meals given or received are reasonable and not lavish.
- Provide meals, gifts or entertainment only when they are connected to a legitimate business purpose (i.e., a business meeting) and refrain from using them to attempt to influence another party in the company's favor.
- Refrain from giving or receiving any gift of more than nominal value (i.e., a company coffee mug) from a business partner without prior review and consent by an Executive Committee member or their delegate.
- Refrain from giving any gift meant to influence a public official.
- Document all gifts, entertainment and meals in your expense reports.
- Refrain from ever giving cash, pre-paid debit cards or gift cards as gifts.

ADDITIONAL INFORMATION

- [Gifts and Entertainment Core Policy](#)
- [Complete and Accurate Business Records and Communications Core Policy](#)



GIFT GIVING

Q: I'm working with a client in Japan, where it is customary to exchange gifts at the beginning of business meetings. I don't want to violate company policy, but I also don't want to offend my client. Is it permissible to bring a small food basket to our meetings?

A: Yes, because the gift is of nominal value and made for a legitimate business purpose. Remember that all gifts must be properly documented in your expense reports.



Avoiding Conflicts of Interest

HOW WE CONNECT WITH OUR VALUES

Integrity matters. We exhibit it by avoiding conflicts of interest, including any situation where personal gain could outweigh the interests of the company.

WHY IT MATTERS

If we place our own interests above those of the company, we run the risk of having our integrity called into question, and may face penalties, including termination or legal issues.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embrace the essence of courage when we:

- Refrain from getting involved in business deals or owning property under circumstances that would create a conflict of interest with the company, including business arrangements with family or friends on behalf of the company.
- Treat all customers and business partners the same, without giving special treatment to family members, friends or those with whom we have personal relationships.
- Refrain from entering into personal relationships with customers or partners of the company.
- Avoid any situation that presents even the appearance of a conflict of interest.



ADDITIONAL INFORMATION

- [Conflicts of Interest Core Policy](#)

Safeguarding Our Assets and Information

HOW WE CONNECT WITH OUR VALUES

We take care of the company’s assets because they are the building blocks for our future. They help us better serve our customers and create value for our shareholders.

WHY IT MATTERS

The company’s assets are the result of hard work by all of our employees, past and present. Our profitability and sustainable growth require that we protect and use our assets wisely.

WHAT ARE ASSETS?

- *Physical assets* include office supplies, furnishings, production machinery, chemicals, warehouse equipment and mobile phones. The land, office buildings and manufacturing facilities where we operate also are physical assets.
- *Information assets* include all data contained in our files and on our servers. This information is important to the daily operations of our business and for the continued growth of the company.
- *Intangible assets* include our reputation, ideas, inventions, intellectual property, formulas, designs, copyrights, trademarks, patents and trade secrets. These assets help us drive innovation and improvement.
- *Financial assets* include money and anything that can be converted to money, such as stocks, bonds, loans and deposits.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embrace the essence of courage when we:

- Take all reasonable steps to ensure that company assets are not damaged, abused, wasted, lost or stolen.
- Demonstrate good judgment in using information and communications systems, and the electronic data they store, process or transmit.
- Always handle company funds honestly, responsibly and in accordance with company policies.
- Promptly report any abuse or misuse of company assets.
- Never remove company-owned property from our facilities for personal use.

CYBERSECURITY PRINCIPLES

Each employee is responsible for promptly reporting any cybersecurity incident.

- It is your responsibility to keep yourself safe online, and to safeguard H.B. Fuller’s interests and information from intrusions.
- Be extra vigilant when using wi-fi and non-company networks.
- Guard your log-in credentials and passwords.
- Carefully review any emails you receive and send.
- Be aware that your mobile device is a target for cyberattacks.

To learn more about cybersecurity, or if you think there may be a cybersecurity threat, go to the IT Help page on Collaborate at <https://collaborate.hbfuller.com/informationtechnology/default2.aspx> or contact the IT Service Desk.



ADDITIONAL INFORMATION

- [Safeguarding Company Assets/Improper Use of Company Assets Core Policy](#)

Navigating International Trade

HOW WE CONNECT WITH OUR VALUES

H.B. Fuller is a global company. We operate in more than 40 countries, and every day we navigate a complex system of laws concerning international trade. We are dedicated to complying with all laws concerning imports, exports and supply-chain security, as well as anti-boycott laws.

WHY IT MATTERS

Trade compliance is a necessity of doing business around the globe. When we obey the laws concerning the movement of goods and the sharing of technology across borders, we keep ourselves in good standing with the governments that regulate us – and that allows us to grow our business in a competitive global marketplace.



ADDITIONAL INFORMATION

- [Trade Compliance Core Policy](#)

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embrace the essence of courage when we:

- Comply with laws regarding imports and exports by:
 - Filing all required documents with customs authorities;
 - Declaring the proper classification, value and country of origin;
 - Paying all applicable duties, taxes and fees; and
 - Maintaining complete and accurate records of all of the above.
- Comply with all sanctions and embargoes directed at particular countries or entities by the U.S. government.
- Refrain from using an agent or middleman to circumvent trade restrictions.
- Refrain from doing business with individuals, groups or entities flagged as terrorists or narcotics traffickers, or other known bad actors by the U.S. government, or any other government whose law applies to the company's trade activities.
- Comply with all U.S. Export Administration regulations concerning "dual-use" products with possible military applications, as well as U.S. International Traffic in Arms Regulations, and any similar laws that apply.
- Refrain from supporting or participating in boycotts not supported by the United States. These laws impose restrictions on boycott-related actions and agreements, such as refusals to do business and furnishing of boycott-related information. These laws also include reporting requirements.

As individuals, we embrace the essence of courage when we:

- Contact the Company Global Trade Compliance Director (GTCD) at the beginning of any proposed international transaction so that the company can identify and resolve trade compliance issues.
- Coordinate with the GTCD any application to be part of a government-sponsored supply-chain security program.
- Direct all correspondence with import/export authorities to the GTCD.

Focusing on Quality and Environmental Stewardship

HOW WE CONNECT WITH OUR VALUES

With every new product we create, our goal is to be innovative, environmentally-friendly and – most importantly – safe.

WHY IT MATTERS

Our customers use our innovative work in adhesives and sealants to build a wide variety of products that play an active role. It is critical to our business success that we produce high quality products safely.



ADDITIONAL INFORMATION

- [Environmental, Health and Safety Laws and Regulations Core Policy](#)

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embrace the essence of courage when we believe that safety is a value that is more important than anything else, and when we adhere to these nine principles:

- All injuries and occupational illnesses can be prevented.
- All operating exposures can be controlled.
- Management is responsible.
- People are the most important element of the health and safety program.
- Safety is a condition of employment.
- It is necessary to thoroughly train all employees to work safely.
- Audits must be conducted.
- All deficiencies must be corrected promptly.
- Off-the-job safety is an important part of the safety effort.

We embrace the essence of courage when we take the time to do it right, the first time, every time by:

- Meeting and exceeding customer requirements.
- Reducing and preventing risks and achieving zero defects.
- Reporting any accidents or events in the workplace with possible environmental impacts.
- Complying with national, state and local EHS (environmental, health and safety) regulations.
- Maintaining accurate and complete records of compliance with EHS regulations.



At H.B. Fuller, we place a strong value on collaboration. We believe that working together leads to better outcomes for our customers. That's why we work with our customers every day to develop innovative solutions to address their adhesion challenges.

The same spirit of collaboration extends to the way we treat each other as company team members. When we respect each other and value the diverse opinions, backgrounds and viewpoints of our fellow employees, we create an environment where innovative ideas can flourish.

It's not just good manners; it's good business. We work better together.

This section of the Code provides guidance on how to create a safe, respectful and collaborative work environment in which the voices and well-being of all employees are valued.



Maintaining a Professional Environment

HOW WE CONNECT WITH OUR VALUES

Everyone deserves to receive honest and respectful treatment at work. That's why we make every effort to create a respectful and safe working environment for all company employees. The company is committed to ensuring our employees are treated with respect and dignity, and are free from discrimination or harassment, particularly that based on gender, gender identity, race, ethnicity, sexual orientation, marital status, physical or mental disability, age, veteran status, religion, national origin or any other legally protected status.

WHY IT MATTERS

We appreciate our employees and feel a responsibility to provide a working environment where they feel valued. We strive to provide a workplace with a culture of respect, trust and safety. It's the right thing to do.

Discriminatory language, sexual harassment and bullying aren't just unpleasant, they're markers of an unproductive work environment. When employees don't feel safe and respected at work, it's difficult for them to be engaged, effective and productive.

When employees feel that their contributions are valued, when they can operate with peace of mind about their personal boundaries and safety, and when they trust their co-workers, they can focus on their work and contribute to the company's success.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We foster the power of collaboration when we:

- Respect the contributions of all of our co-workers and make an active attempt to listen and understand their points of view.
- Refrain from using derogatory, sexist, racist, classist, disability discrimination or homophobic language in the workplace.
- Maintain appropriate, collegial business relationships with our co-workers.
- Practice active listening.
- Respect the personal space and boundaries of our co-workers.
- Treat others fairly.
- Actively, but respectfully, oppose any instance of discrimination, harassment or bullying we encounter, and report offensive behavior to managers or Human Resources, if necessary.
- Maintain an alcohol-free and drug-free workplace.



HARASSMENT

Q: I have spoken with my supervisor several times about yelling at me in his office and in front of co-workers. I am not the only person who feels belittled. What should I do?

A: No employee should be forced to work in an intimidating environment. Contact your HR representative or [HBFPATH](#), our company's ethics helpline.

ALCOHOL USE

Q: Can I have a drink before my shift? I am not on company property at that time.

A: No. You are expected to be alcohol- and drug-free (except for the use of medications prescribed for you) while you work. On the other hand, having a glass of wine with dinner after work, at home, is not a violation of this Code.

ADDITIONAL INFORMATION

- [Fair Treatment Core Policy](#)
- [Alcohol and Drugs Core Policy](#)



Creating a Culture of Diversity and Inclusion

HOW WE CONNECT WITH OUR VALUES

Like our global customers, our employees come from a wide variety of backgrounds. We strive to create and maintain a culture of inclusion and respect in which the diverse voices of our employees are acknowledged and appreciated.

WHY IT MATTERS

We believe the most effective teams represent a diverse range of voices and outlooks. We also believe that teamwork is possible only when each member of the team feels respected and heard. In our quest to deliver innovative, groundbreaking solutions to our customers, it's important to foster an environment where everyone's voice is valued. We believe that diversity in our team leads to new ideas, helps us solve problems and allows us to better connect with our global customer base.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We foster the power of collaboration when we:

- Treat all co-workers, partners and customers with respect.
- Actively recruit, hire, train and promote employees based upon principles of equal opportunity.
- Refrain from discriminatory or derogatory language or actions in the workplace.
- Maintain a healthy, respectful and open workplace environment.
- Respect the views, backgrounds and experiences of our fellow employees.



ADDITIONAL INFORMATION

- [Fair Treatment Core Policy](#)



Protecting Human Rights

HOW WE CONNECT WITH OUR VALUES

H.B. Fuller is committed to doing business ethically around the globe. Safeguarding human rights in the countries where we do business is a priority for us and reflects our long-standing commitment to improving the lives of the globe's citizens.

WHY IT MATTERS

As a large global employer, we have an opportunity to support dignity, autonomy and fair wages for our employees and the employees of our suppliers.

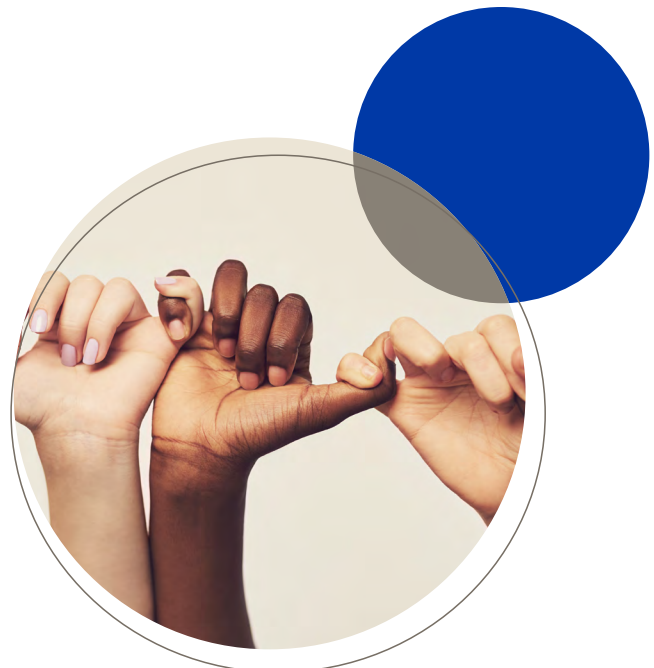
WHAT WINNING THE RIGHT WAY LOOKS LIKE

We foster the power of collaboration when we:

- Refrain from employing anyone under the age of 18, unless that worker is part of a state-sanctioned apprenticeship program.
- Respect the rights of employees to unionize, form associations or seek legal counsel from a third party.
- Abide by all local laws concerning wages, overtime pay and legally-mandated benefits in the countries where we operate.
- Refuse to do business with any company suspected of using slave labor, indentured servants or prison labor.
- Report any suspected violations of this section or our Fair Treatment Core Policy to our supervisor, Human Resources or the Law Department via [HBFPath](#).

ADDITIONAL INFORMATION

- [Fair Treatment Core Policy](#)



Ensuring Health and Safety

HOW WE CONNECT WITH OUR VALUES

A key priority is to keep our employees safe. Whether it's in the lab or in the office, we have a responsibility to ensure a safe and healthy work environment for all.

WHY IT MATTERS

Our employees work in a wide variety of environments, some more obviously hazardous than others. But no workplace task is worth endangering your or others' health. When we know that our safety is secured, we can concentrate on providing innovative solutions for our customers.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We foster the power of collaboration when we:

- Obey all safety standards put in place by the Environmental, Health and Safety Department, federal and state regulations, industry regulatory bodies and the labs in which we do research.
- Thoroughly train new employees in safety regulations and procedures.
- Refrain from taking unnecessary risks or instructing others to do so.
- Perform frequent maintenance of equipment and facilities.
- Immediately report hazardous situations and potential chemical exposures.
- Comply with any federal or state regulatory agency investigations, inquiries or audits.
- Immediately report all injuries and illnesses to a supervisor.
- Keep up-to-date, complete and accurate records of inspections, audits and incidents.
- Recognize that safety is a condition of employment.



ADDITIONAL INFORMATION

- [Environmental, Health and Safety Laws and Regulations Core Policy](#)



Engaging With Social Media

HOW WE CONNECT WITH OUR VALUES

Social media is a part of our daily lives, and we recognize the right of all employees to use social media platforms in their personal and work lives.

WHY IT MATTERS

In an increasingly connected world, the line between a person’s work and personal life has become blurry. Social media is a wonderful tool for personal expression and marketing, but it also presents risks to a company in the global economy. Following a clear set of guidelines can help employees use social media without affecting the company’s reputation, relationships or business success.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We foster the power of collaboration when we:

- Use personal social media accounts responsibly, ethically and appropriately, with the understanding that even personal material can reflect back on H.B. Fuller as a company.
- Identify ourselves as a company employee, and clarify that our opinions are ours alone, if commenting on topics relating to H.B. Fuller. Use a clear disclaimer: “The postings on this site are my own and do not necessarily represent H.B. Fuller’s positions, strategies or opinions.”
- Refrain from posting any confidential or proprietary information related to our company, its partners and its customers on our personal accounts.
- Follow copyright, fair use, financial disclosure and other applicable laws.
- Abstain from using the company corporate logo without express consent from the company.
- Refrain from citing or referencing company customers, suppliers or partners without their express approval.
- Refrain from engaging in online speculation or rumors regarding the company online.
- Use good judgment – if it feels uncomfortable, ask for guidance from a supervisor before posting.



TWITTER QUANDARY

Q: I’m pretty active on Twitter. I use it mostly to follow the news and business developments in the field of a couple of my biggest customers. Recently, I noticed some false rumors about H.B. Fuller have begun circulating. I want to set things right by citing my own experience and position within the company. May I?

A: Not without permission. What you’re describing is a problem best tackled by the company’s Global Communications team, not an individual employee acting on her or his own initiative. It’s admirable that you want to defend the company against false accusations. Contact Global Communications to report the issue.

ADDITIONAL INFORMATION

- [Complete and Accurate Business Records and Communications Core Policy](#)



Media Inquiries

HOW WE CONNECT WITH OUR VALUES

As a global company, H.B. Fuller believes in using the power of global media to further our objectives as the best adhesives company in the world. We do a lot of good in the world, and we want people to know about it.

Our Global Communications Department employs experts in public relations who work closely with our businesses to promote the company around the world.

WHY IT MATTERS

Our reputation as an innovative leader in adhesives is bolstered by every positive news story about our products, customers and industry-leading developments. However, our image can be tarnished by misinformation. That’s why we employ a team of media experts to manage our public relations and media appearances – and why, on a daily basis, we leave the job of media relations to them, not individual employees.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

Only authorized company spokespersons may speak to the media. Employees should not speak to the media directly without prior approval from Global Communications.

We foster the power of collaboration when we:

- Direct all media inquiries to the **Global Communications team**



ADDITIONAL INFORMATION

- [Complete and Accurate Business Records and Communications Core Policy](#)
- [Corporate Disclosure Policy](#)

Giving Back to the Community

HOW WE CONNECT WITH OUR VALUES

H.B. Fuller is deeply committed to ensuring that the communities where we live and work thrive. We care about our communities and take it upon ourselves to strengthen them through sustainability efforts, corporate giving and employee volunteerism.

WHY IT MATTERS

We have a responsibility to the communities where we do business. Investing in the environment, youth leadership, and science, technology, engineering and mathematics (STEM) education is one of the ways we support our communities. It sends a clear signal that we are committed to giving back.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We foster the power of collaboration by:

- Caring about the communities where we live and work.
- Investing in STEM education and youth leadership initiatives.
- Connecting employees to volunteer opportunities across the globe.
- Engaging with nonprofits to make a difference for future generations.



We're in the business of solving problems. Our customers and global partners know that when they come to us, they can expect creative, innovative solutions to any issue they throw at us.

Our highly trained team has been chosen specifically for its creativity, its intelligence and its excellence. Everyone at our company – from lab technicians to customer service representatives, engineers to sales reps – exhibits the qualities we value as a company: resourcefulness, leadership and vision.

Every day, we choose to excel as a company. We bring passion and creativity to our work. It's why people want to work with us. This section covers how H.B. Fuller embodies the spirit of winning, both organizationally and on an individual level.



Operating With Integrity

HOW WE CONNECT WITH OUR VALUES

H.B. Fuller has built a strong reputation for integrity and transparency. We honor our legacy when we exhibit honesty and fairness in all our dealings with customers, business partners and regulators.

WHY IT MATTERS

Relationships matter. When customers and regulators see us as trustworthy, we build their trust and promote strong relationships with them.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embody the spirit of winning when we:

- Are honest and straightforward with our customers.
- Set clear expectations with customers and partners, and complete work efficiently and on time.
- Comply with all regulations, inspections and investigations by governments and regulating bodies.
- Market our products truthfully to our customers, partners and the public at large.
- Strive to embody a spirit of openness and transparency.



ADDITIONAL INFORMATION

- [Fair Competition and Competitive Information Core Policy](#)



Protecting Confidential Information

HOW WE CONNECT WITH OUR VALUES

As a global leader in adhesives, we manage valuable data and trade secrets related to our own research and business practices. When we protect the intellectual property of the company, we safeguard what gives us our competitive edge.

WHY IT MATTERS

Continued success in developing new products and services, attracting new customers and maintaining our competitive advantage depends on protecting the company's confidential information and knowledge.



WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embody the spirit of winning when we:

- Share confidential and proprietary information only with employees who are authorized and have a legitimate business need to access it. Confidential business information includes:
 - Proprietary information, such as chemical formulas and manufacturing processes
 - Trade secrets, trademarks and other intellectual property
 - Nonpublic financial information (including pricing) and projections
 - New product and marketing plans
 - Customer and supplier lists
 - Research and development ideas and information
 - Manufacturing processes
 - Procurement information
 - Information concerning potential acquisitions, investments and divestitures
 - Legal opinions and attorney work product
- Secure documents, data and devices with effective physical measures, as well as passwords and encryption.
- Avoid discussing confidential matters in public places, such as elevators, trains and restaurants.
- Do not let confidential information become visible to others (such as working on a laptop during an airplane flight or accessing an unsecured Wi-Fi network).
- Ensure that only authorized people access company facilities.

- Escort all visitors and do not let them enter restricted areas.
- Report any possible breaches so they can be promptly and properly addressed.



MY FRIEND, THE CHEMIST

Q: A friend of mine from graduate school is a chemist for a major pharmaceutical company. He maintains an interest in the field of adhesives and has asked me about a particular process we're testing in the lab where I work. I'm sure his interest is merely the result of his curiosity. Can I tell him what we're up to?

A: No. Even if you trust your friend, and even if it doesn't seem like your research could affect his own, your work for H.B. Fuller is confidential. Telling him the details of your work would equate to telling him a trade secret, and you have no assurances about what he'll do with that information once he has it – or who he'll tell. Tell your friend you can't share any such information.

ADDITIONAL INFORMATION

- [Confidential Information, Trade Secrets and Labeling Core Policy](#)



Safeguarding Personal Data

HOW WE CONNECT WITH OUR VALUES

We safeguard the privacy, confidentiality and security of our personally identifiable information and other sensitive private data.

WHY IT MATTERS

In order to run our business, comply with legal requirements and administer benefits, it's necessary for the company to collect, store, use and share certain personally identifiable information. We handle this data only in accordance with our Global Privacy Policy and applicable local data privacy laws, which are designed to protect information from improper disclosure.

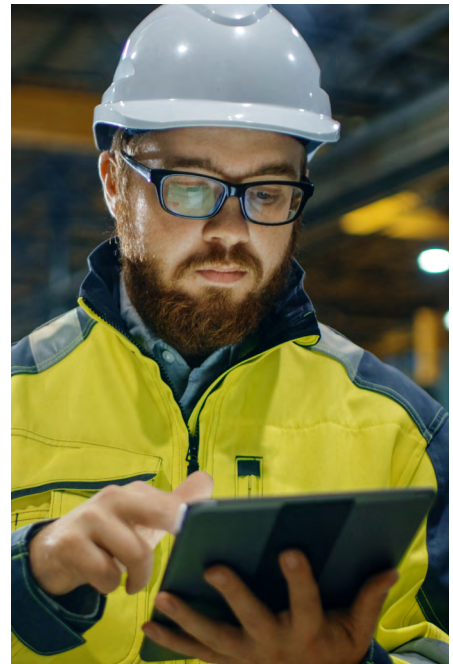
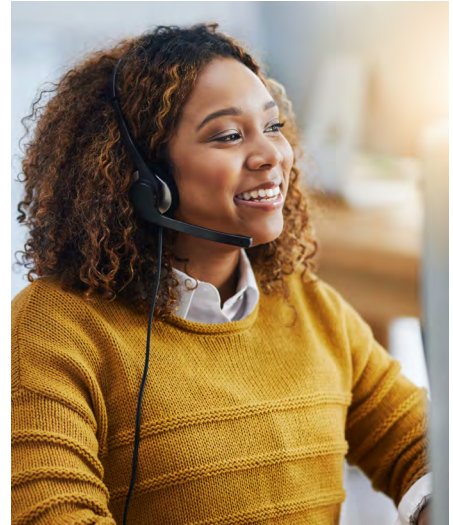
WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embody the spirit of winning when we:

- Comply with all privacy and data protection laws that apply to us.
- Collect and use employee and customer personal data only to meet legal requirements or facilitate effective business operations.
- Take steps to properly secure any personal data to which we require access in the course of our jobs.
- Never share personal data with anyone, inside or outside the company, without relevant explicit permission, except in support of business operations.

ADDITIONAL INFORMATION

- [Global Privacy Policy](#)



Complying With Antitrust Laws

HOW WE CONNECT WITH OUR VALUES

Antitrust laws – often called “competition laws” outside the United States – ensure fair competition between companies and help prevent monopolies. As part of its mission to be a good business citizen, H.B. Fuller strives to conduct itself according to any relevant antitrust or competition laws in the countries where we do business.

WHY IT MATTERS

Our products, innovation and unmatched customer service are what makes us successful, not inappropriate market conduct. Our reputation has long hinged on our integrity: We compete fairly for our customers’ business, and when we win, we win the right way. Antitrust laws are complex, and violations can result in major damage awards, substantial penalties and criminal prosecutions for the individual, as well as for H.B. Fuller.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embody the spirit of winning when we:

- Comply with all relevant antitrust or competition laws in countries where we do business.
- Consult the Law Department concerning competition laws and their interpretation, as necessary.
- Refrain from cooperative arrangements with competitors concerning:
 - The price of a product
 - Production limits
 - Sales territories, customer allocation or particular projects
 - Boycotts of potential customers, distributors or suppliers
- Avoid any conduct that might give the appearance of a conspiracy in restraint of competition.
- Avoid meeting with competitors unless given the express approval of a supervisor and in consultation with the Law Department.
- Vet and periodically review any membership in trade organizations.
- Refuse to discuss prices or plans for future prices with a competitor.
- Report any violations of competition law internally to your supervisor, the Law Department and/or [HBFPATH](#), the company’s ethics helpline.

ADDITIONAL INFORMATION

- [Antitrust and Competition Law Core Policy](#)



PRICING INFORMATION

- Q:** What shall I do if, after announcing a price increase to customers, I receive a call from a competitor who wants to confirm the price increase?
- A:** Tell the competitor that discussing prices is against company policy. You should neither confirm nor deny the increase, or otherwise discuss the increase. You should make a notation of the conversation and send a copy to the Law Department.
- Q:** Can I use a competitor’s price list sent to me by one of our customers or distributors?
- A:** There is nothing wrong with receiving a price list from customers or distributors. It is good business practice to be aware of the competition in the marketplace. However, it is also a good idea to note on the list the date you received it and from whom you received it to avoid any possibility of confusion. If you receive a price list directly from the competition, send it back with a letter stating that it is against company policy to receive price lists from competitors. You should copy the Law Department in your letter, and do not copy the price list for your file.
- Q:** I received a call from a former company employee who, several years ago, went to work for a competitor. He has invited me to lunch to talk about “old times” at our company. What subjects should I avoid discussing?
- A:** It is certainly okay to get together with former employees. However, remember to avoid discussing any confidential or competitive information, including customers, products or prices of products.



Gathering Competitive Intelligence Fairly

HOW WE CONNECT WITH OUR VALUES

As a member of a competitive global marketplace, the company must have a detailed understanding of its markets, customers and competition. But in our desire to know as much as we can about our place in the marketplace, we can't lose sight of our guiding principles: integrity, honesty and fairness.

WHY IT MATTERS

Our reputation for integrity is hard-earned. We shouldn't jeopardize it by engaging in unlawful agreements or corporate espionage. When we gather intelligence about our competitors, suppliers and customers lawfully and honestly, we help create an atmosphere of trust, we stay in the good graces of the governments in whose jurisdictions we do business, and we fulfill our obligations to our customers and shareholders.

WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embody the spirit of winning when we:

- Accept competitive information only when we believe that it has been gathered through lawful means.
- Only accept competitive information if we believe that receipt and use of it is lawful.
- Refrain from accepting or using a competitor's information if it is proprietary or confidential.
- Refrain from doing any of the following to obtain access to a competitor's information:
 - Misrepresenting our identity
 - Engaging in surveillance or electronic eavesdropping
 - Stealing and/or trespassing
 - Asking an employee to breach a confidentiality agreement with a current or prior employer
- Refuse to divulge to any H.B. Fuller employee a previous employer's proprietary or confidential information.
- Ask for guidance from a supervisor, Human Resources or the Law Department, if we're unsure about a piece of competitive intelligence or the manner in which it was obtained.



NEW EMPLOYEE WITH A STORY TO TELL

Q: I'm a new hire. I used to work for a major competitor, and I know things about the business that could really help grow our company's business. Can I mention them to my supervisor?

A: It depends. Is the information confidential or a trade secret of your previous employer? If it is, disclosing it to our company is against this Code and company policy, and could expose you or H.B. Fuller to legal action by the other company. If it's public information or nonconfidential, you may be able to disclose it to our company. Consult your supervisor or the Law Department before proceeding.

ADDITIONAL INFORMATION

- [Fair Competition and Competitive Information Core Policy](#)



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Resources

Avoiding Insider Trading

HOW WE CONNECT WITH OUR VALUES

H.B. Fuller is committed to doing business ethically and responsibly. We do not participate in or condone insider trading, and we want to avoid even the appearance of misconduct.

WHY IT MATTERS

Insider trading is illegal and can result in costly fines and even prison time. More importantly, it runs directly counter to our company's identity as an ethical business partner. Our customers, shareholders and partners trust us to conduct our business in an ethical and lawful manner. When we avoid practices like insider trading, our reward is trust.



WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embody the spirit of winning when we:

- Refrain from selling company stock when we possess material nonpublic information – any information that might be considered important by an investor in determining whether or not to trade in the company's stock or that could affect the market price. Examples of information that may be deemed "material" include:
 - Financial information about the company in general or about a strategic business unit of the company, an important product development, a potential acquisition or merger;
 - Earnings projections or plans for the entry into a new line of business; and
 - Loss of key management or an external development which could have a significant effect on the company or its operations.
- Avoid telling others to buy or sell company stock because of material nonpublic information we've learned through our work with the company.
- Refrain from purchasing, selling or advising others to purchase or sell stock from other companies because of nonpublic information we've learned about them through our work with our company.
- Treat our stock in the company as a long-term investment, and avoid any activity – like short-selling – that could give the appearance of speculation.

TRADING WINDOWS

Executive officers, directors and employees designated by the General Counsel (and their respective immediate family members) are prohibited from buying or selling company stock except during specified open trading periods. Such individuals must notify the General Counsel prior to any transaction in company stock.

ADDITIONAL INFORMATION

- [Trading in Company Securities Core Policy](#)

Q/A

TRADING WINDOWS

- Q:** How do I know if I am subject to the insider trading windows restriction?
- A:** If you are not receiving emails from the Law Department on the window dates, then you are not on the list.



Keeping Accurate Records

HOW WE CONNECT WITH OUR VALUES

We take recordkeeping seriously. To ensure that we operate smoothly, efficiently and in accordance with the law, employees must keep accurate, detailed, and reliable records of company transactions and activity.

WHY IT MATTERS

The day-to-day operation of our company depends on accurate, truthful and reliable recordkeeping. Accurate records enable sound business decisions and strategic planning for the future. They also keep the company compliant with global regulations.



WHAT WINNING THE RIGHT WAY LOOKS LIKE

We embody the spirit of winning when we:

- Ensure that all company records are accurate, timely and complete.
- Refrain from entering any false or artificial information into the company's records.
- Record transactions in accordance with generally accepted accounting principles.
- Perform all transactions with management's authorization.
- Retain and dispose of all records in accordance with the company's Global Records and Information Management Core Policy and Records Retention Schedule.
- Destroy records and information in one of the three following ways:
 - Shredding (for paper documents)
 - Pulverizing (for computers and electronic storage devices)
 - Permanent deletion (for electronic information)
- Retain all information related to claims and litigation concerning H.B. Fuller.

ADDITIONAL INFORMATION

- [Complete and Accurate Business Records and Communications Core Policy](#)



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