



# BUSINESS CODE OF CONDUCT AND ETHICS

# Doing the Right Thing

The Home Depot has a strong commitment to ethics and integrity, and our core values define the means by which we do business.



Doing the right thing each and every day for the benefit of our associates, customers, vendors, suppliers, service providers and the communities we serve is critical to our ongoing success.

Each day we are challenged to be fair and consistent, to comply with the laws that govern our activities, and to notify others when something needs to be corrected. Our *Business Code of Conduct and Ethics* provides you with guidance in making the right choices when called upon to do so. Please become familiar with our Code, as well as all of our Corporate Compliance Policies and Standard Operating Procedures. As you review these materials, please keep in mind that it is not simply the letter of the Code, but the spirit that we all must embrace.

If you are faced with a situation where you think our Company values or compliance with the law may be in question, you should bring this to the attention of your immediate manager or supervisor, your Human Resource representative, Corporate Compliance, or, if you prefer, you may anonymously report your concern through the AwareLine at 800-286-4909, [www.thdawareline.com](http://www.thdawareline.com) or the HR Service Center at 866-myTHDHR (866-698-4347).

Working together, we will maintain our values and ensure the success of The Home Depot.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig M. Jensen'.

Chairman, Chief Executive Officer and President



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**Have a question?  
We're here to help**

The Corporate Compliance Team can provide guidance in situations where you are unsure of the right thing to do. We understand that doing the right thing at work is not always as easy as it may sound. Just send us an email with your question at [corporate\\_compliance@homedepot.com](mailto:corporate_compliance@homedepot.com).

## INTRODUCTION

This *Business Code of Conduct and Ethics* (the Code) is intended to provide you straightforward information about The Home Depot's operating principles and offer tools to help you make decisions that align with our ethical expectations and legal obligations. All associates are expected to act with honesty and integrity. Adhering to the highest ethical standards and doing the right thing are the driving forces behind The Home Depot's success and have been a core component of how we have done business since the beginning. Inside you will find examples of ethical decisions you may face as an associate as well as references to our global Corporate Compliance policies. You will also find information on what to do if you have questions or concerns regarding ethical conduct.

This Code applies worldwide to all of The Home Depot associates, inclusive of business operating units, subsidiaries and all members of the Board of Directors. This Code is designed to provide a broad overview and scenarios on how to conduct Company business in a manner consistent with our core values. As it cannot cover every potential scenario you may encounter, remember that in most situations your own good judgment is the best gauge when facing a potential ethical issue.

## OUR CORE VALUES

Our values reflect the beliefs, principles and standards that form the groundwork of our behavior and should be drawn on when making decisions. We believe in Excellent Customer Service, Building Strong Relationships, Entrepreneurial Spirit, Respect for All People, Creating Shareholder Value, Doing the Right Thing, Giving Back and Taking Care of Our People.



## COMPLYING WITH THE CODE AND THE LAW

We have operations in countries around the world, and our associates are citizens of these various countries. As a result, our operations are subject to a diverse set of local laws and cultures. Associates are expected to comply with this Code and all applicable laws and regulations. If local law ever conflicts with this Code, seek the guidance of Corporate Compliance or your Legal partner for resolution.

Board members, officers and associates are expected to report suspected or observed violations of this Code, Company policies or applicable laws and regulations to Company management. Failure to follow the provisions of this Code can lead to discipline, up to and including termination.

## THE OPEN DOOR POLICY

We each have a right and responsibility to ask questions about issues that are not clear to us. The Home Depot's *Open Door Policy* provides you access to two-way, honest and respectful communications. This Policy is intended to create an atmosphere that encourages you to voice your concerns, express doubts, discuss problems, ask questions, make observations and offer suggestions about workplace issues. You should feel comfortable approaching your immediate supervisor, any other supervisor/manager, human resource associate, corporate officer or any other Company resource at any time.

## ZERO TOLERANCE-FOR RETALIATION

If you suspect wrongdoing, including violations of this Code, Company policies or the law, report it immediately. Retaliation against anyone who reports a good faith concern is prohibited and will not be tolerated. Good faith means that your concern is honest and accurate to your knowledge, regardless of whether it is discovered at a later date that you were mistaken. Allegations made maliciously in bad faith may be subject to disciplinary action.

## WAIVERS TO THIS CODE

For associates, Executive Vice Presidents may authorize an exception to certain provisions of this Code or may designate a Senior Vice President or Vice President to review and approve such exceptions on their behalf. All exceptions must be approved in advance and must be submitted to Corporate Compliance at [corporate\\_compliance@homedepot.com](mailto:corporate_compliance@homedepot.com).

For Board members and Executive Officers, waivers of the *Business Code of Conduct and Ethics* may be granted only by the Audit Committee or the full Board of Directors and will be subject to applicable laws and regulations regarding disclosure to shareholders.

## GETTING ANSWERS TO YOUR QUESTIONS OR REPORTING A CONCERN

If you have questions or concerns, speak up. The Home Depot provides several options to report potential violations of this Code, Company policies or applicable laws and regulations.

Depending on your concern, often it is best to speak first with your immediate manager or supervisor. Your immediate manager or supervisor is best-suited to respond to your issue immediately and may already be familiar with the concern you are reporting.

If you feel uncomfortable talking with your immediate manager or supervisor for any reason, contact one of the following resources:

- Contact the 24-hour AwareLine at 800-286-4909 or [www.thdawareline.com](http://www.thdawareline.com), where you can choose to remain anonymous
- Contact your HR representative or the HR Service Center (HRSC) at 866-myTHDHR (866-698-4347)
- Contact Corporate Compliance at 770-384-4098, or via email at [corporate\\_compliance@homedepot.com](mailto:corporate_compliance@homedepot.com)



**Q.** *I reported a concern about fraud in our store to my supervisor, Bob. Since reporting my concern, Bob has stopped including me in certain meetings. Is this retaliation?*

**A.** *Significant changes in how you are treated after reporting a potential issue can be perceived as retaliation. If you feel you are being treated differently since reporting an allegation, raise your concern by notifying your HR representative, contacting the HRSC, AwareLine or Corporate Compliance.*



## DOING THE RIGHT THING FOR OUR ASSOCIATES

### SAFETY

We are committed to providing our associates and customers a safe working and shopping environment. As an associate, you are expected to comply with all safety requirements. If you are concerned about safety or have questions, comments or feedback regarding regulatory requirements, notify your supervisor immediately. The Home Depot should never ask or expect an associate to perform any task that is considered unsafe.



To learn more about Home Depot's commitment to the safety and health of its customers and associates, read the *Safety Policy* available on myApron or by calling Corporate Compliance.

*Q. Marcus, a freight supervisor, asked Tonya to use a forklift to help move some pallets, unaware that Tonya was not properly trained to operate lift equipment. What should each party do in this situation?*

*A. Realizing the potential safety issue, Tonya should tell Marcus she is not properly trained. Marcus should advise Tonya not to operate the forklift, find another associate to help and ensure Tonya gets the necessary training so she can assist in the future.*

## LABOR AND EMPLOYMENT

The Home Depot believes that all people should be treated with dignity, and we will not accept conduct that fails to show appropriate respect to others. Our core value of Respect for All People exemplifies how we should treat our fellow associates, customers, suppliers, vendors and service providers.

Any conduct that fails to show appropriate respect to others, including fellow associates, customers, professional customers, vendors, suppliers and service providers, violates the Company's values. The following are examples of unacceptable conduct: insults; threats; intimidation; ridicule; vulgarity; discrimination; harassment; physical or verbal abuse; sexually explicit humor, conversation or behavior; slurs or stereotyping; unwelcome sexual advances; unwelcome touching or invasion of personal space; ignoring the rights of others; and insensitivity to the beliefs and customs of others.

## ALCOHOL AND DRUG ABUSE

We are committed to providing a safe, healthy and drug-free workplace. Using illegal drugs at any time, using alcohol when on the job or on Company premises or coming to work under the influence of alcohol or drugs is strictly prohibited. This prohibition is a condition of employment. Any associate found in violation of this condition of employment is subject to immediate termination. Please refer to the Company's *Standards of Performance* for further detail.

## FAIR EMPLOYMENT PRACTICES/DISCRIMINATION

The Home Depot is an equal opportunity employer committed to ensuring associates work in an environment of mutual respect. We will not discriminate against any associate or applicant with regard to race, color, sex (gender), sexual orientation, gender identity or expression, age, religion, national origin, disability, protected veteran or other uniformed service status or any other characteristic or basis protected by applicable law.

## HARASSMENT

The Home Depot will not tolerate harassment in the workplace. Harassment or disrespectful behavior can be verbal, non-verbal or physical. Examples include:

- Sexual advances, requests for sexual favors or any other unwelcome visual, verbal or physical conduct of a sexual nature
- Offensive jokes, racial slurs or inappropriate comments regarding an individual's ethnicity
- Yelling or intimidating others, including making threats

## VIOLENCE IN THE WORKPLACE

We have a zero tolerance policy for actions that threaten our associates, customers, suppliers, vendors, service providers, visitors or property. Examples of threatening actions include physical assaults or the intentional destruction of Home Depot property or merchandise. If you observe a situation that could become potentially violent, report it to your immediate supervisor, HR Representative or the AwareLine.

## WHO TO CALL FOR ASSISTANCE

**CARE/Solutions for Life is your free and confidential resource, available 24 hours a day, seven days a week, to provide information and services to improve the quality of your work and home life.**

Assistance includes:

- Short-term counseling for individual, relationship and family concerns
- Child/family and adult/elder care services
- Financial and legal assistance and other resources

These are all available at no cost to you and your household members.

For information or assistance, please call CARE/Solutions for Life at 1-800-553-3504 or visit [www.CAREsolutionsforLife.com](http://www.CAREsolutionsforLife.com).



CARE/Solutions for Life

*Q. I think I was passed up for a promotion due to my race. What should I do?*

*A. If you feel you have been discriminated against due to race or any other legally protected characteristic, you should raise your concern by notifying your HR representative, the HRSC, or by contacting the AwareLine or Corporate Compliance.*

*Q. My co-worker circulated an email that was offensive to me. What should I do?*

*A. First ask the co-worker to stop sending you these types of emails. If you are not comfortable speaking directly with the co-worker, or the co-worker does not stop sending these types of emails, you should contact your immediate supervisor, HR representative, the HRSC, the AwareLine or Corporate Compliance.*



Want to learn more about Home Depot's Labor and Employment standards? Read the *Labor and Employment Policy* or the *Standards of Performance* available on myApron or by calling Corporate Compliance.

## CONFLICTS OF INTEREST

You have a responsibility to make decisions based on the interests of The Home Depot without regard to how they might benefit you. A conflict can occur when your private or professional interests interfere in any way – or even appear to interfere – with the interests of the Company. Even if you did not intend for your actions to create a conflict, the perception of a conflict by others can be just as damaging to you or The Home Depot. Be on the lookout for situations that may create the appearance of a conflict and avoid them whenever possible.

Questions concerning conflicts of interest should be referred to Corporate Compliance.



For further information, see the *Conflict of Interest Policy*, available on myApron or by calling Corporate Compliance.

## FINANCIAL INTERESTS

Your personal financial interests, or those of your family, should not conflict with your responsibilities to The Home Depot. In particular, financial interests in a Home Depot current or prospective supplier, vendor or service provider, as well as any instance in which you or a family member may receive personal gain through opportunities discovered through Home Depot, may present a conflict of interest.

If you have the authority to award business to or control decisions regarding a particular supplier, vendor or service provider, or supervise others who have that authority, you (and your immediate family members) should not have a direct financial interest (including debt and all forms of equity such as shares of common or preferred stock, options, warrants, LLC membership interests, etc.) in that entity, unless you receive approval from Corporate Compliance.

Additionally, associates should not have a financial interest that creates a competing interest against The Home Depot. If you are unsure if a financial interest creates a conflict of interest, contact Corporate Compliance or read the *Conflict of Interest Policy* available on myApron for guidance.

Financial investments where you have no direct investment (e.g., mutual funds, 401k investments, etc.) are not considered conflicts of interest for the purpose of this Code.

## RELATIONSHIPS WITH SUPPLIERS, VENDORS AND SERVICE PROVIDERS

Social and romantic relationships with current or prospective suppliers, vendors and service providers can create an appearance of a conflict of interest and, in the worst case, could interfere with your ability to perform your job objectively. If you have a social or romantic relationship with a supplier, vendor or service provider for which you have direct and primary responsibility for the business relationship, disclose the relationship to Corporate Compliance. If you are unsure whether a relationship creates a conflict, contact Corporate Compliance for guidance.

In addition, if you are asked to serve as a board member, consultant, advisor or employee of any current or prospective third party that may do business with Home Depot, you must have Corporate Compliance review the relationship for any potential conflicts of interest prior to accepting the position.

The Home Depot expects its suppliers, vendors and service providers to act ethically and in a manner that meets or exceeds the standards set forth in this *Business Code of Conduct and Ethics*.



## GIFTS AND ENTERTAINMENT

The acceptance of gifts and entertainment from current or potential suppliers, vendors or service providers can cause a conflict of interest or give the appearance that you put your personal interests ahead of The Home Depot's best interests. As a general rule, you should not accept gifts and entertainment except for the limited situations, described below, in which gifts and entertainment may be accepted as part of normal business activities or common courtesies between business partners.

Gifts and entertainment should never be solicited and when accepted, should be infrequent and a reasonable dollar value. Gifts and entertainment should never influence or appear to influence a business decision. If you have a question about a situation, discuss it with your supervisor or Corporate Compliance.



The following examples of gifts and entertainment are never allowed:

- Cash or cash equivalents such as gift cards or gift certificates
- Free or discounted merchandise or services not available to the general public
- Vendor product samples for personal use
- Travel for an associate or an associate's family member

The following examples of gifts and entertainment are allowed when infrequent and reasonable:

- Meals that are associated with business activities
- Admission to industry events such as conferences and trade shows and related activities during the event (meals, giveaways, etc.) as long as it is provided to multiple clients or potential clients
- Continuing professional education or development opportunities, such as product knowledge training or other activities to further associate knowledge and skills
- Tickets to sporting or cultural events offered to associates with a market value under \$100 if the offer is for the associate to attend the event with the supplier, vendor or service provider (in no case should an associate solicit tickets)
- Gift baskets and other perishable items, provided they are shared with other associates at your work location
- Other nominal gifts under \$100

Financial or in-kind donations made directly to The Home Depot Foundation are not considered to be a form of gifts and entertainment and are therefore not subject to this policy.

### WHAT TO DO IF YOU RECEIVE AN UNSOLICITED GIFT THAT IS NOT LISTED ABOVE?

If you receive an unsolicited gift that is not allowed above, advise your immediate supervisor and return the gift with a letter explaining our guidelines. You can find a Gift Return Letter template on the Corporate Compliance page on myApron or by contacting Corporate Compliance.

There are some situations when refusing a gift would be inappropriate, awkward or cause professional embarrassment. Certain gifts may also be impractical to return. If you are faced with these situations, contact Corporate Compliance to determine proper disposition of the gift.

If you are a store associate and receive an unsolicited gift that is not allowed above, give it to your Store Manager, and they will donate the item to a Home Depot-approved charity through the Framing Hope program. For more information, please visit the Framing Hope page on myApron.

### APPROVAL OF GIFTS AND ENTERTAINMENT

Approvals are not needed for any items allowed above. If there is a business reason why you should accept a gift or entertainment that is not explicitly allowed, complete a Gift Approval Form and return it to Corporate Compliance. You can find a Gift Approval Form on the Corporate Compliance page of myApron or by contacting Corporate Compliance.

### GIVING GIFTS AND ENTERTAINMENT

Gifts and entertainment for customers, suppliers, vendors and service providers should be supported by a valid business purpose and should be reasonable under the circumstances. We should always be respectful of the policies of our customers, suppliers, vendors and service providers when considering potential gifts or entertainment.

Any gifts or entertainment for foreign government officials or employees of foreign state-owned enterprises must comply with The Home Depot *Foreign Corrupt Practices Act (FCPA) and Anti-Bribery Policy*. Providing anything of value to local, state or federal officials in the U.S. must comply with The Home Depot *Political Activity and Government Relations Policy*. More information about these topics can be found in the "Doing the Right Thing For Our Communities" section of this document.



# DOING THE RIGHT THING FOR OUR CUSTOMERS

## ANTITRUST AND FAIR COMPETITION

The Home Depot competes vigorously and lawfully to serve our customers in the competitive environment in which we operate and always acts with integrity and a spirit of fair dealing in doing so. Accordingly, all associates are required to comply with antitrust and related competition laws in jurisdictions in which we do business. These laws in the United States and other countries typically restrict and/or regulate competitive business practices in order to preserve fair, honest and vigorous competition. Violations of these laws can result in damage to our reputation, severe monetary penalties, and criminal penalties for those involved.

It is important to collect information about our competitors to compete effectively; however, such collection must be done in a lawful and ethical manner. Associates are prohibited from engaging in illegal business practices, including entering into agreements, reaching “understandings” or exchanging information with competitors about how we do business and sharing confidential and proprietary business information with or requesting such information from competitors. In addition, pricing decisions must be made independently of our suppliers, vendors or service providers. If you are dealing with a potential antitrust issue, seek the advice of the Legal Team at [legal\\_questions@homedepot.com](mailto:legal_questions@homedepot.com).



To learn more about fair competition and how to interact with competitors, read the *Antitrust Policy* available on myApron or by calling Corporate Compliance.

## CONFIDENTIALITY, PRIVACY AND INFORMATION PROTECTION

Much of the information with which we come into contact at work each day is confidential. Confidential information is not generally known to competitors and others outside the Company and may include: financial information, including but not limited to information about sales, earnings, expenses and investments; pricing information; supplier, vendor or service provider lists; customer data; plans for future store/facility locations; business development materials; costs of goods; personnel files, Company policies, manuals, guidelines, procedures and SOPs; computer software; design documents and specifications; videos; and memos. Confidential information is critical to our competitive advantage and must not be disclosed, except as specifically authorized or legally required. Information that has been made public by the Company, such as press releases, news articles or advertisements, is not considered confidential and does not require protection. It is the responsibility of each of us to use discretion in handling Company information so that we do not inadvertently reveal confidential information to competitors, suppliers, vendors, service providers, friends and/or family members. If you are unsure about whether certain information is confidential, presume that it is.

We respect the privacy of our customers and associates and are committed to the responsible collection, use and disposal of their Personal Information. Personal Information is information that can be used to identify a specific individual. Some examples of Personal Information include a person's name in combination with their credit card number, driver's license number and/or social security number. All associates are expected to safeguard Personal Information in accordance with our *Privacy & Information Protection Policy* and applicable laws. For more details and suggestions on how Personal Information should be properly handled, refer to the Company's *Privacy & Information Protection Policy*.

If you identify a loss, theft or misuse of any Personal Information, report it immediately to [IT\\_Security@homedepot.com](mailto:IT_Security@homedepot.com).

The Home Depot maintains a large variety of assets including physical assets and valuable proprietary and confidential information assets. Proprietary and confidential information may be maintained in either hardcopy or electronic formats. It is vital to our reputation that all associates ensure this information is adequately protected and controlled. Examples of ways to protect proprietary or confidential information include:

- Password protect proprietary or confidential information on a shared computer drive
- Lock your computer screen when away from your computer
- Properly dispose of Personal Information

*Q. A department manager asked me to send her a list of everyone in her department who worked on a recent Team Depot event so that she can thank them for their participation. I want to help her out, but I am very busy. Is it ok if I just send her a spreadsheet I prepared for HR that lists the names of everyone in our department and circle the Team Depot participants? Does it matter that the spreadsheet also includes other information, such as associates' social security numbers, phone numbers, addresses and emergency contact information?*

*A. No, the spreadsheet should not be shared. Associates should always be on alert for situations in which they might be handling Personal Information and protect it accordingly. This responsibility includes limiting access to this kind of information to only those who have a legitimate business need to see it. Here, the spreadsheet contains additional Personal Information, including Sensitive Personal Information such as social security numbers, which the department manager does not need to do her job. Only the minimum amount of information necessary for the department manager to do her job should be shared.*

*Q. I cannot find a thumb drive I used to store some files I was working on for my job. Thumb drives are not that expensive, so I think it will be faster and easier if I just pay to replace it myself. The files on the thumb drive may have contained some customer information. Do I still need to tell someone that I lost the thumb drive?*

*A. Yes. Personal Information should not be stored on flash or thumb drives as they are easily lost or stolen. Any lost or stolen Personal Information should be immediately reported to your manager and [IT\\_Security@homedepot.com](mailto:IT_Security@homedepot.com)*



Want to learn more about how to protect personal and business information? Read the *Privacy & Information Protection Policy* available on myApron or by calling Corporate Compliance.



# DOING THE RIGHT THING FOR OUR SHAREHOLDERS

## PROTECTING THE COMPANY'S ASSETS AND INTELLECTUAL PROPERTY

While at work you will have access to important Company property and information. All associates should protect The Home Depot's property in order to avoid theft, carelessness and waste as these have a direct impact on our profitability. All Company assets should be used for the benefit of The Home Depot and never used to promote your own interests or those of another person or company.

Our intellectual property must be used properly and protected from infringement by others. The Home Depot logo, Homer, advertisements and computer software are examples of assets that make up our intellectual property. Inventions, discoveries, ideas, concepts, written material and trade secrets that are created by associates using Company time, resources or materials are also the property of The Home Depot.

## INSIDER TRADING

We comply with federal and state securities laws and do not tolerate insider trading. Insider trading means trading securities on the basis of material, non-public information or sharing material non-public information with another person so they can trade. "Material" information is information that a reasonable investor would likely consider important when making a decision to buy, sell or hold securities. Some examples of material, non-public information would include the following if not otherwise publicly disclosed:

- Earnings, revenues or other financial information
- Business conditions or strategies, including sales volumes, margins and conditions affecting our industry
- Potential mergers, acquisitions, tender offers, joint ventures or changes in assets
- Introduction of significant new products or services or business development initiatives
- Developments regarding customers or suppliers, including the gain or loss of customers or suppliers
- Changes in the control or management of The Home Depot
- Borrowing activities or issues related to liquidity
- Events related to our securities (e.g. stock splits, dividend changes, share repurchases)

It is unethical and illegal to buy or sell stock or other securities on the basis of material non-public information. It also is illegal to communicate non-public information to any other person so that they may trade.

In addition, neither associates nor members of the Company's Board of Directors may enter into hedging or monetization transactions designed to limit the financial risk of ownership of Home Depot securities. These include prepaid variable forward contracts, equity swaps, collars, exchange funds and other similar transactions, as well as speculative transactions in derivatives of Home Depot's securities, such as puts, calls, options (other than those granted under a Home Depot compensation plan) or other derivatives.

*Q. I am good friends with Jack, a vendor representative at ABC Company. Jack told me that ABC Company just landed a big sale with The Home Depot. Although an official announcement has not been made, can I purchase shares of ABC Company?*

*A. No. This could be considered trading on the basis of material, non-public information and a violation of Company policy, as well as federal securities laws.*



To learn more about insider trading restrictions including who to call about a potential trade, read the *Securities Laws Policy* available on myApron or by calling Corporate Compliance.

## FINANCIAL INTEGRITY AND REPORTING

Accurate business records are essential to the management of the Company and maintaining the Company's reputation and credibility. It is the responsibility of each associate to maintain complete and accurate financial and business records. These records include financial statements as well as time sheets, bills, invoices, expense reports, payroll and benefits records and other essential Company data. The Home Depot is committed to providing full, fair, accurate, timely and understandable reports and disclosures to regulatory authorities and the public. Associates must comply with all government laws, rules and regulations and the requirements of other appropriate private and public regulatory authorities applicable to our financial and business records. This includes making sure that our financial statements conform with generally accepted accounting principles, the Company's accounting policies and its system of internal controls. Associates are expected to report any observed or suspected violations of law or regulation, Company Policy or activity that might constitute financial fraud or financial misconduct to the General Counsel, Corporate Compliance, or any member of the Enterprise Risk Council, Disclosure Committee and/or Board of Directors. Any proposed change in Company accounting policies and practices must be reported to and approved in advance by the Corporate Controller and the Chief Financial Officer.



To learn more about the Company's commitment to maintaining accurate books and records, read the *Financial Controls Policy* available on myApron or by calling Corporate Compliance.

## RECORDS RETENTION

You may collect large amounts of information as part of your daily job, such as emails, spreadsheets and contracts that may need to be retained for business or legal reasons. It is important to keep this information for the period of time required and then properly dispose of it thereafter.

The Home Depot maintains a *Records Management Policy* that provides guidance on what documents are business records and how long they should be maintained. Associates should consult this policy before destroying business records.



To determine the required retention time for your documents, see the *Records Management Policy* available on myApron, or email Records Management at [records\\_management@homedepot.com](mailto:records_management@homedepot.com).





# DOING THE RIGHT THING FOR OUR COMMUNITIES

## ENVIRONMENTAL RESPONSIBILITY

We are committed to obeying environmental laws and regulations and acting responsibly to conserve and preserve natural resources. Due to our unique position in the marketplace, we work to use our influence to minimize impacts on the environment by supporting and promoting innovation in the responsible use of our resources. The Home Depot will continue to promote recycling, conservation of energy and natural resources, safe use and disposal of hazardous materials and the development of environmentally sound alternatives. We expect our associates, suppliers and other business partners to join in our efforts to preserve our environment, and we encourage our customers to do likewise.



To learn more about the Company's commitment to the environment, visit the Responsibility page of Home Depot's website at [corporate.homedepot.com/responsibility](http://corporate.homedepot.com/responsibility)

**Q.** An associate spilled fertilizer in a store aisle. The associate swept up the spilled fertilizer and threw it in the trash. Was this the correct way to handle the spill?

**A.** Certain fertilizers can be hazardous materials. The associate should follow the Safety SOP located on myApron regarding the correct steps to take when dealing with and disposing of hazardous waste.

## GOVERNMENT INTERACTIONS

The Home Depot demands the highest standards of professional conduct and ethics in our interactions with government officials. We strictly prohibit the giving of money, gifts, services or entertainment to government officials in exchange for official action or otherwise to gain an improper business advantage. In addition, potential business transactions involving government officials or their family members can raise special regulatory and ethical concerns. Any requests from government officials or their family members for payments by, business relationships with, or benefits from the Company for the officials or their family members should be brought to the attention of the General Counsel or Corporate Compliance. Additional detail on specific aspects of interactions with government officials is provided below.

## POLITICAL INVOLVEMENT

In an effort to ensure that federal, state and local governments of those countries in which we conduct business act responsibly and in the best interest of our customers and associates, The Home Depot actively participates, and encourages its associates to participate, in the political process. In doing so, Home Depot demands the highest standards of professional conduct and ethics from our associates. All associates are required to comply with the Company's *Political Activity and Government Relations Policy*, which contains standards of conduct for participation in the political process.

The Home Depot sponsors The Home Depot Political Action Committee (PAC), which supports public officials and candidates who understand the issues affecting The Home Depot and promote a favorable business climate for the Company. Participation in the PAC is strictly voluntary and has no effect on one's employment with The Home Depot.

Some state and local governments have laws that restrict political contributions from companies and/or their employees who sell products to them. Home Depot Board members, senior executives and associates responsible for soliciting contracts with state or local governments should check with the General Counsel or the Company's Government Relations Department before making personal political contributions at the state and local level.

The *Political Activity and Government Relations Policy* and most current annual report of corporate contributions to political candidates, parties, committees and other entities operating under Section 527 of the Internal Revenue Code is available at [ir.homedepot.com](http://ir.homedepot.com) under the "Corporate Governance > Overview."



Do you want to learn more about The Home Depot's involvement in the political process? Visit [www.homedepotpac.com](http://www.homedepotpac.com), read the *Political Activity and Government Relations Policy* available on myApron or by calling Corporate Compliance.

## GOVERNMENT CONTRACTING

The rules imposed on the Company when it sells to the government are often different from, and more restrictive than, the rules that apply to purely commercial transactions. As a government contractor, we are committed to complying with these requirements and view doing business with the government as a special trust and responsibility.



To learn more about doing business with the government, read the *Government Contracting Policy* available on myApron or by calling Corporate Compliance.

## THE FOREIGN CORRUPT PRACTICES ACT (FCPA) AND ANTI-BRIBERY

It is against our policy to participate in any form of corruption. Neither we, nor outside parties acting on the Company's behalf will bribe another party to gain any benefit for the Company. Among other things, U.S. law and the foreign laws of countries where we do business make it illegal to offer or pay a bribe to a foreign official for a business favor or to gain an improper business advantage. The term "foreign official" includes employees of any government agency, government-owned business (such as state-owned enterprises), or political party, plus any political candidate. Bribes go beyond giving cash payments and may also include giving gifts or other items of value. Our policy also prohibits giving facilitating or expediting payments to foreign officials. Since The Home Depot can be held liable for payments made by third parties, outside parties engaged directly or indirectly by The Home Depot who may interact with foreign officials on the Company's behalf must be approved by Legal, be thoroughly screened before being hired

*Q. A foreign customs official detains import product due to incorrect paperwork but offers to release the goods for a payment. You are told this is customary in the country. Is this allowed?*

*A. No. You must fix the paperwork. Providing money, gifts or entertainment to the foreign official would be a bribe and violate local law and the FCPA.*

and must contractually agree to comply with The Home Depot's *Foreign Corrupt Practices Act (FCPA) and Anti-Bribery Policy* and these laws.

Given the complexity of the FCPA and anti-bribery laws, we have a robust training program in place to ensure awareness and compliance. Associates should contact the Legal Team with any questions concerning obligations to comply with this policy at [legal\\_questions@homedepot.com](mailto:legal_questions@homedepot.com).



For more information about conducting business in compliance with anti-bribery laws, read The Home Depot *Foreign Corrupt Practices Act (FCPA) and Anti-Bribery Policy* available on myApron or by calling Corporate Compliance.