THE HOME DEPOT

BUSINESS CODE OF CONDUCT AND ETHICS

On August 20, 2026, The Home Depot, Inc. amended its Business Code of Conduct and Ethics (the "Code"). The Code was amended to clarify, expand and update the treatment of a number of topics, including conflicts of interest and insider trading. Certain non-substantive, administrative and stylistic changes were also made. These changes did not relate to, or result in, any explicit or implicit waiver under SEC rules of any provision of the prior Code.

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U.S. ENGLISH

DOING THE RIGHT THING

The Home Depot has a strong commitment to ethics and integrity, and our core values guide how we conduct 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 partner, Corporate Compliance, or, if you prefer, you may anonymously report your concern through THD AwareLine at 800-286-4909 or thdawareline.com.

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

Thank you.

Sincerely,

Ted Decker

Ted Decker, Chair, President and Chief Executive Officer

OUR HOME DEPOT FAMILY

OUR CODE OF CONDUCT APPLIES TO OUR HOME DEPOT FAMILY WORLDWIDE

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HAVE A QUESTION? WE'RE HERE TO HELP

Corporate Compliance 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. Visit the Corporate Compliance & Ethics page on myApron for more information.

INTRODUCTION

This *Business Code of Conduct and Ethics* (the Code) is intended to provide you with 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 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.

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 Code.

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.

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 your HR partner
- Contact the 24-hour THD AwareLine at 800-286-4909 or thdawareline.com, where you can choose to remain anonymous
- Contact Corporate Compliance

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 partner, THD 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 standards and demonstrate safe behaviors in everything you do. If you are concerned or have questions, comments or feedback regarding safety or environmental compliance in your workspace, notify your supervisor immediately. The Home Depot should never ask or expect an associate to perform any task that is considered unsafe.

Q: Marcus, a department 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.**

i 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 contacting Corporate Compliance.

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 for 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, 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

The Home Depot believes that every associate has the right to work in a safe, drug and alcohol-free workplace. The Home Depot will be an active participant in the fight against drug and alcohol misuse. Associates also play a key role in establishing and monitoring a drug and alcohol-free workplace. Associates must adhere to our *Drug and Alcohol Free Workplace* policy established as part of our commitment to maintaining a safe environment. Any violation of this policy is subject to disciplinary action up to and including termination of employment pursuant to The Home Depot's *Standards of Performance.*

FAIR EMPLOYMENT PRACTICES/DISCRIMINATION

The Home Depot is an equal opportunity employer committed to ensuring all associates work in an environment of mutual respect. We will not discriminate against any associate or applicant with regard to race, color, religion, creed, national origin, ancestry, citizenship status, disability (actual or perceived physical or mental disability), medical condition, pregnancy or perceived pregnancy, genetic information, marital status, sex, gender, gender identity, gender expression, transgender status, age, sexual orientation, reproductive health decision-making, military and veteran status or any other basis prohibited under 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:

- Verbal harassment (e.g., epithets, derogatory comments or slurs)
- Physical harassment (e.g., assault, impeding or blocking movement or any physical interference with normal work or movement, when directed at an individual)
- Visual forms of harassment (e.g., derogatory posters, cartoons, drawings or inappropriate messages or photographs sent via text message, email or any other means)
- Sexual favors (e.g., unwanted sexual advances or the conditioning of an employment benefit upon an exchange of sexual favors)
- Threats or intimidation
- Bullying behavior, including but not limited to threats, intimidation, coercion, ridicule, insults or belittling
- Scheduling in a punitive manner

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 verbal threats of violence, physical assaults or the intentional destruction of Company property or merchandise. If you observe a situation that could become potentially violent, report the issue immediately to Human Resources or a member of management. The incident should then be reported by the manager to the Global Security Operations Center (GSOC) at 1-877-436-3376 as soon as possible.

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 partner or by contacting THD 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 if the co-worker does not stop sending these types of emails, you should contact your immediate supervisor, HR partner, THD AwareLine or Corporate Compliance.**

ASSOCIATE ASSISTANCE

Carelon Wellbeing is a free, confidential Employee Assistance Program (EAP) providing support and/or guidance in a number of areas, including:

- Uncertainty
- Stress
- Depression
- Substance use
- Family challenges
- Burnout
- Anxiety
- Life changes
- Domestic violence

All associates, spouses and children of associates and household members of associates have free and confidential access to 6 sessions per situation per year.

For information or assistance, please call Carelon Wellbeing at 888-275-0021 or visit livetheorangelife.com/carelon.

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 contacting Corporate Compliance.

CONFLICTS OF INTEREST

You have a responsibility to make decisions based on the interests of The Home Depot without regard for how you or your family members might benefit. A conflict of interest can occur when your personal interests interfere – 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. Look out 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 contacting Corporate Compliance.

FINANCIAL INTERESTS

Your personal financial interests, as well as those of your family, must not conflict with your ability to act in the best interests of The Home Depot. Financial interests in a current or prospective Home Depot supplier, vendor, service provider, competitor or any situation in which you, a family member or anyone who shares your home could personally benefit from opportunities discovered through The Home Depot may create a conflict of interest.

If you control or influence decisions involving a supplier, vendor or service provider – or if you supervise someone who does – you, a family member or anyone who shares your home may not have a direct financial interest in that entity unless approved by Corporate Compliance. Direct financial interests include debt and all forms of equity, including stock, options, warrants and LLC membership interests.

Associates should not have any financial interest that creates a conflict of interest with 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 involvement are not considered conflicts of interest for the purpose of this Code (e.g., mutual funds, 401k investments).

RELATIONSHIPS

Social, family and romantic relationships with current or prospective suppliers, vendors, service providers and other associates can create an appearance of a conflict of interest and, in some cases, could interfere with your ability to perform your job objectively. If you have a relationship with a supplier, vendor or service provider whose business relationship you support, you must disclose it to Corporate Compliance. If you have a close personal or romantic relationship with a direct report or supervisor, either currently or within the previous twelve months, you must disclose it to Corporate Compliance for review in partnership with HR. If you are unsure whether a relationship creates a conflict, contact Corporate Compliance for guidance.

EXTERNAL ENGAGEMENTS

External engagements, including outside employment and participation on boards or advisory councils, may create conflicts of interest.

Associates who are offered a board, advisory or consulting role with a for-profit company must contact Corporate Compliance for a conflict of interest assessment before accepting the position. Requests will be evaluated on a case-by-case basis to assess alignment with Company policies, business interests and the associate's obligations to The Home Depot.

GIFTS AND ENTERTAINMENT

Accepting gifts and entertainment from current or potential suppliers, vendors or service providers can create a conflict of interest or make it appear that you put your personal interests ahead of The Home Depot's interests.

Only accept gifts and entertainment when they are infrequent, reasonable in value and part of normal business activities or common courtesies between business partners. Be aware there are certain types of gifts and entertainment that are never allowed, even when infrequent and reasonable in value.

Gifts and entertainment should never be solicited and should never influence or appear to influence a business decision. If you have a question about a specific 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 or lodging for an associate or an associate's family member

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

✓	Meals associated with business activities
✓	Admission to industry events or professional development opportunities (e.g., conferences, trade shows, educational programs) and associated meals or nominal giveaways under $200 (must be offered to multiple clients or potential clients) Associated travel and lodging must be paid by The Home Depot
✓	Business entertainment, including events or activities serving a business purpose where the supplier, vendor or service provider attends with the associate (personal guests are not permitted) Major sporting, cultural or similar events require prior approval from the associate's VP or SVP and Corporate Compliance. Officer requests require approval from their leader and the VP of Internal Audit & Corporate Compliance

✓	Gift baskets and other perishable items, provided they are shared with other associates at your work location
✓	Other nominal gifts under $200 in value

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 are unsure whether an unsolicited gift is allowed

Associates should contact Corporate Compliance if the value, timing or circumstances could create an appearance of influence, if the situation does not clearly fit within the guidelines provided or if approval is needed for business entertainment.

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 *Vendor Gift Return Letter* template on the Corporate Compliance & Ethics page on myApron or by contacting Corporate Compliance.

There are some situations when refusing a gift would be inappropriate, awkward or would 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 from a supplier, vendor or service provider that is not allowed above, check with your store manager and they will help donate the item to a nonprofit partner in your area. If you receive a gift or tip from a customer, contact your HR Partner for guidance.

Approval of gifts and entertainment

No approval is required for any gifts or entertainment explicitly allowed above. If you have a valid business reason to accept a gift or entertainment that is not specifically permitted, you must complete a *Vendor Gift Approval Form* and submit it to Corporate Compliance for review. The form is available on the Corporate Compliance & Ethics page on myApron or can be obtained 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 a recipient's company policies 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_question@homedepot.com.

To learn more about fair competition and how to interact with competitors, read the *Antitrust Policy* available on myApron or by contacting 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, sharing and disposal of their Personal Information. Personal Information includes any information that identifies, relates to, describes or is reasonably capable of being directly or indirectly associated with or linked to a specific individual, including household information. Examples of Personal Information include a person's full name, email address, phone number or any other information linked to them. Sensitive Personal Information is a subset of Personal Information and includes Personal Information that presents a higher risk to individuals if it is accessed, processed or disclosed without authorization. Home Depot has additional legal and regulatory obligations to protect this information. Some examples of Sensitive Personal Information include a person's 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 Cybersecurity@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 documents or media containing Personal Information (e.g., securely shred)

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 accidentally emailed a spreadsheet containing customer information to the wrong recipient. The recipient replied that they deleted the email. Since the information was not misused, do I still need to report it?

A: **Yes. Any potential unauthorized disclosure of Personal Information must be reported immediately to your manager and Cybersecurity@homedepot.com. Even if the information appears to have been deleted, the Company must evaluate the incident and determine whether any additional action is needed.**

Want to learn more about how to protect personal and business information? Read the *Privacy & Information Protection Policy* available on myApron or by contacting 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 family of logos, 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 AND PREDICTION MARKETS

We are dedicated to conducting ourselves with integrity in all matters, including compliance with federal and state securities laws, commodities laws and gaming and anti-gambling statutes applicable to our business. Our *Insider Trading and Prediction Markets Policy* prohibits insider trading and, in certain circumstances described below, participation in prediction markets. 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. The term “trading” refers to all purchases and sales, and with respect to Home Depot securities, charitable and other bona fide gifts. "Material" information is information that a reasonable investor would likely consider important when deciding to buy, sell or hold securities, or information that would significantly alter the total mix of information publicly available about the

Company. Examples of material non-public information may include, but are not limited to, 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, dispositions, 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 trade 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.

Our *Insider Trading and Prediction Markets Policy* prohibits associates and other personnel as well as certain third parties from trading in the securities of The Home Depot, any company that has a business relationship with The Home Depot (e.g., our customers, suppliers, vendors, service providers or joint venture partners) or any company that The Home Depot is evaluating for a potential transaction or business relationship if the trading is based on material non-public information about The Home Depot or the other company obtained through employment with or service to The Home Depot. This restriction does not apply if the information has been publicly disclosed for at least one business day.

Neither associates nor members of the 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.

In addition, we impose restrictions on the placement of bets on prediction markets related to the outcome of a variety of future events; we refer to these types of bets and similar variations or instruments through which they are placed as "event contracts." We generally prohibit using, or tipping another person to use, event contracts to bet on any matter or event (i) involving, directly or indirectly, the use of non-public information obtained through your employment with or service to The Home Depot, regardless of materiality, or (ii) creating an actual or perceived conflict of interest between you and the Company. Any activity in event contracts must also comply with other company policies, applicable law and the rules of the applicable prediction market.

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.**

Q: I am on the merchandising team responsible for finalizing the exact date when the seasonal Halloween line, including our 12-foot "Skelly," is set up on store floors. Can I buy or hold an event contract on a prediction market platform that predicts whether the in-store launch will occur before or after July 15?

A: **No. Buying, selling or holding an event contract involving Company operations creates an inherent perceived conflict of interest and is prohibited. This prohibition applies regardless of your role and even if you cannot alter the launch date or otherwise influence the outcome. Refer to the *Insider Trading and Prediction Markets Policy* for information on other restrictions related to participation in event contracts.**

To learn more about insider trading restrictions including who to call about a potential trade and restrictions on use of event contracts, read the *Insider Trading and Prediction Markets Policy* available on myApron or by contacting 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 or another member of senior management, Internal Audit or Corporate Compliance. If you are uncomfortable approaching a member of management, Internal Audit or Corporate Compliance, you can contact THD AwareLine on a confidential basis. Any proposed change in Company accounting policies must be reported to and approved in advance by the Company's Chief Accounting Officer and Controller or his or her designee.

To learn more about the Company's commitment to maintaining accurate books and records, read the *Financial Controls Policy* available on myApron or by contacting 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 contact Records Management at records_management@homedepot.com.

DOING THE RIGHT THING FOR OUR COMMUNITIES

ENVIRONMENTAL RESPONSIBILITY

We are committed to complying with applicable environmental laws and regulations and working to reduce the impact of our operations and products on the environment. We work closely with our suppliers to develop more sustainable products and packaging. The Home Depot focuses on the areas where we can have the greatest impact by promoting our five environmental pillars: carbon emissions, sustainable forestry, circularity, water conservation and responsible chemistry. Additionally, we aim to help educate our customers on selecting and using products in ways that are safer, more efficient and have less environmental impact. We expect our associates, suppliers and other business partners to join in our efforts to preserve our environment.

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.**

i To learn more about the Company's commitment to the environment, visit the Living Our Values page of Home Depot's website at corporate.homedepot.com/page/living-our-values.

GOVERNMENT INTERACTIONS

The Home Depot holds itself to the highest standards of professional conduct and ethics in all interactions with government officials. We strictly prohibit offering or providing money, gifts, services or entertainment to government officials in exchange for official action or to obtain improper business advantage. Business transactions involving government officials or their family members may raise special regulatory and ethical concerns. Any requests from government officials or their family members for payments, business relationships or benefits from The Home Depot for the officials or their family members should be promptly reported to the General Counsel or Corporate Compliance. Additional detail on specific aspects of interactions with government officials is provided below.

POLITICAL INVOLVEMENT

To help ensure that federal, state and local governments in the countries where we operate 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, The Home Depot demands the highest standards of professional conduct and ethics from our associates engaged in political activity. All associates must comply with the Company's *Political Activity and Government Relations Policy*, which outlines appropriate 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 entirely voluntary and has no impact on an associate's employment.

Some state and local jurisdictions have laws that restrict political contributions from companies and/or their employees, especially those who sell products to the government. Home Depot Board members, Officers and associates responsible for soliciting or negotiating contracts with state or local governments must check with the General Counsel or the 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 under Corporate Governance.

To learn more about The Home Depot's involvement in the political process, read the *Political Activity and Government Relations Policy* available on myApron or by contacting 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 business that sells to government entities, 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 contacting 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. 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" (i.e., non-U.S. government official) includes employees of any government agency, government-owned business (such as state-owned enterprises), public international organization or political party, plus any political candidate. Bribes go beyond giving cash payments and may also include giving gifts or other items of value, such as charitable donations. 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 and must contractually agree to comply with The Home Depot's *Foreign Corrupt Practices Act (FCPA) and Anti-Bribery Policy* and these laws.

In addition, strict compliance with anti-corruption standards requires ensuring that no payments or items of value are provided to Foreign Terrorist Organizations (FTOs) or their affiliates, directly or indirectly. Preventing financial support to FTOs and national security threats is a hallmark of modern FCPA compliance and government enforcement priorities.

Finally, it is our policy to comply with the statutory duty the FCPA imposes on public reporting companies to maintain accurate books and records as well as an adequate system of internal accounting controls.

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_question@homedepot.com.

Q: A foreign customs official has detained import product due to incorrect paperwork but is offering to release the goods for a payment. I am 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.**

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 contacting Corporate Compliance.