



GLOBAL ANTI-BRIBERY POLICY¹

Fellow Employees:

Leggett & Platt, Incorporated is unwavering in its commitment to conduct its business with honesty, integrity, and fairness. These principles serve as the foundation for our long-standing Global Anti-Bribery Policy, which prohibits all forms of bribery and corruption.

We expect every employee to understand and comply with our Global Anti-Bribery Policy. Accordingly, we believe it is important that you read this policy carefully at least once a year to ensure that you fully understand your part in maintaining our high standards of business conduct. Our continued success depends upon you and the actions you take.

If you have any questions after reading our Global Anti-Bribery Policy or are uncertain whether a particular circumstance could violate anti-bribery or anti-corruption laws, please contact our Legal Department.

We appreciate your continued cooperation and efforts on L&P's behalf.

Sincerely,

Mitch Dolloff
President and CEO

¹ Our Global Anti-Bribery Policy used to be named the Global Anti-Corruption Policy. We rebranded the Global Anti-Corruption Policy as the Global Anti-Bribery Policy to avoid any confusion with our Global Competition Policy, which is a separate policy.

GLOBAL ANTI-BRIBERY POLICY

I. Our Policy

This Global Anti-Bribery Policy (“Policy”) applies to all employees of Leggett & Platt, Incorporated and its subsidiaries and controlled affiliates worldwide (collectively, “L&P,” “we,” or “our”), except for employees in Europe. (L&P employees in Europe are covered by a separate policy called the Global Anti-Bribery Policy – European Version.) This Policy also applies to all third-party representatives acting on L&P’s behalf inside the United States with non-U.S. government officials or outside the United States. Third-party representatives include, but are not limited to, agents, consultants, contractors, distributors, intermediaries, joint venture partners, or other third-party representatives (“Third-Party Representative(s)").

L&P strives to be a good corporate citizen who complies with all laws and regulations governing our operations. L&P is committed to compliance with both the spirit and letter of the anti-bribery and anti-corruption laws of all countries where we operate (“Anti-Bribery Law(s)"). L&P’s commitment to compliance with these laws is rooted in more than the legal consequences of non-compliance. Engaging in conduct which violates Anti-Bribery Laws is contrary to L&P’s commitment to conduct its business with honesty, integrity, and fairness.

Pursuant to this commitment, L&P prohibits its employees and Third-Party Representatives from promising, offering, authorizing, or providing anything of value, either directly or indirectly, to any person, entity, or government official, to induce improperly favorable business treatment or to affect improperly in any way any governmental decisions. In addition, L&P’s accounting practices must comply with the requirements of the United States Foreign Corrupt Practices Act (the “FCPA”) and all Anti-Bribery Laws. L&P employees and Third-Party Representatives must understand and follow the FCPA, applicable Anti-Bribery Laws, and this Policy.

II. Introduction

Corruption is the abuse of entrusted power for private gain. Corruption can take many forms, but it most often occurs through bribery. Because corruption and bribery continue to impact businesses globally, the United States and other governments enacted Anti-Bribery Laws. In the United States, the FCPA was enacted to stop U.S. companies and their subsidiaries worldwide from directly or indirectly making corrupt payments to and bribing non-U.S. government officials. Many other Anti-Bribery Laws apply to private commercial transactions. **The FCPA applies to all L&P operations worldwide, and other Anti-Bribery Laws also may apply, depending on the circumstances.**

The FCPA makes it a crime to offer to pay or otherwise compensate non-U.S. government officials to obtain or retain business or secure an improper advantage. The term “government official” includes all government employees, as well as anyone acting on behalf of a government-owned or controlled company (sometimes called a state-owned

enterprise), a political candidate, official, or party (like members of the Chinese Communist Party), or a public international organization (such as the United Nations, World Bank, or European Union). The FCPA also requires that publicly traded companies like L&P maintain a system of internal controls and books and records that accurately reflect every transaction.

III. Prohibition Against Bribery

Bribery is promising, offering, giving, or receiving, directly or indirectly, anything of value to influence improperly the behavior of someone in government or business to obtain or retain business, or secure an improper advantage.

L&P prohibits all forms of bribery, whether in private commercial transactions, with government officials, or otherwise. This ban includes, but is not limited to:

- both the payment and receipt of bribes;
- attempts to secure an improper advantage in any area (for example, obtaining or retaining business with a customer, or securing government authorizations, permits, or other favorable treatment);
- promises or offers of anything of value (for example, extravagant trips; gifts of significant value, including money; excessive entertainment, including meals; or even job offers) in an attempt to obtain any improper benefit;
- requests or agreements to receive anything of value as an inducement or reward for the improper performance of any function or business-related activity, including kickbacks;
- offers by any Third-Party Representatives made in an attempt to obtain any improper benefit for or on behalf of L&P, whether or not with the blessing of any L&P company or employee; and
- all means of directing improper payments or other benefits, whether as bribes, commissions, subcontracts, purchase orders, or consultancy agreements, and whether directly or indirectly through Third-Party Representatives.

Bribery engaged in by a L&P employee or a Third-Party Representative anywhere around the world violates this Policy and may result in a violation of the FCPA or the Anti-Bribery Laws of other countries. A violation of any of these laws is a serious offense which can result in fines for L&P and monetary penalties and imprisonment for individuals. Even the appearance of a breach of these laws could do great damage to L&P's reputation and the reputation of any individuals involved. When in doubt about the appropriateness of any conduct, L&P requires that you seek additional guidance before taking any action that may subject L&P to potential liability.

IV. Facilitation Payments

Facilitation payments (or grease payments) are payments made to expedite or secure the performance of routine, non-discretionary government actions (for example, paying a small amount to a government official to have the power turned on at a factory, or expediting shipments through customs). Many jurisdictions prohibit facilitation payments. L&P also prohibits facilitation payments (even if they are not technical violations of the FCPA or other Anti-Bribery Laws). Exceptions may be made in limited circumstances with the prior written approval of the General Counsel. Approval will never be provided where the payment is intended to obtain an improper advantage or violates applicable law.

V. Use of Third-Party Representatives

Anti-Bribery Laws prohibit the use of Third-Party Representatives to make payments which would otherwise violate Anti-Bribery Laws if made directly by L&P. Legal liability is not limited to those who actively participate in illegal conduct. Legal liability may extend to those who, while not taking an active role in the illegal conduct, make payments to a Third-Party Representative and ignore warning signs about the ultimate illegal use to which the payments are to be applied.

L&P's practice of fairness and professionalism extends to the activities of L&P's Third-Party Representatives. L&P must be careful to avoid situations involving Third-Party Representatives that might lead to a violation of Anti-Bribery Laws. It is much better not to enter into a relationship with a Third-Party Representative than it is to conduct business through questionable payments made by such party.

Prior to entering into any agreement with any Third-Party Representative who will act on behalf of L&P inside the United States with non-U.S. government officials or outside the United States, L&P must:

- perform proper and appropriate anti-bribery due diligence; and
- obtain from the Third-Party Representative contractual representations of anti-bribery compliance as determined by the Legal Department.

Please contact the Legal Department for assistance with anti-bribery due diligence or anti-bribery contractual provisions.

L&P employees are expected to remain alert for possible violations of this Policy by Third-Party Representatives and bring such circumstances to the attention of management and L&P's Legal Department immediately so that L&P can respond appropriately and expeditiously. L&P employees who interact with Third-Party Representatives must carefully monitor the activities and performance of such parties, including by carefully examining each invoice submitted and requiring a detailed accounting of services performed and payments made on L&P's behalf. Conscious disregard, deliberate ignorance or willful blindness to circumstances which should put a L&P employee on notice of a probable violation is prohibited under this Policy.

VI. Permissible Gifts, Entertainment, Donations and Charitable Contributions

If permitted by local law and this Policy, L&P employees or Third-Party Representatives may provide modest gifts, reasonable entertainment (including meals), and donations and charitable contributions to third parties. Great care should be taken to ensure that such activity is tied to legitimate business purposes to avoid any corruption and bribery issues.

Gifts. The value of gifts given by L&P employees or Third-Party Representatives shall not exceed U.S. \$150 (or equivalent in local currency) in total per recipient per year. The U.S. \$150 limit is an aggregate limit that applies to the recipient and any family members of the recipient. When giving gifts, the U.S. \$150 annual limit applies to the total of all gifts given by all L&P employees and Third-Party Representatives collectively. All gifts which exceed the U.S. \$150 value either alone, or in total for the year, must be approved in advance in writing by both the L&P General Counsel and the applicable L&P Segment President. Gifts of cash or cash equivalents, such as VISA gift cards that have widespread acceptance, are prohibited.

Entertainment. The cost of entertainment provided by L&P employees or Third-Party Representatives shall not exceed U.S. \$150 (or equivalent in local currency) per recipient per occasion. The U.S. \$150 limit is an aggregate limit that applies to the recipient and any family members of the recipient. All entertainment exceeding the U.S. \$150 value must be approved in advance in writing by the appropriate L&P Segment President.

Donations and Charitable Contributions. While the \$150 limit on gift-giving does not apply to donations or charitable contributions, determining that any requested donation or contribution is going to a bona fide organization for a charitable purpose is a must. Any donation or charitable contribution which involves a government official or a customer must always be reviewed by L&P's Legal Department prior to being made. In addition, all requests for donations or charitable contributions at the branch, unit, group, or segment-level which exceed US \$5,000 in total per recipient during any given year must be approved in advance in writing by both the L&P General Counsel and the applicable L&P Segment President. All requests for donations or charitable contributions from L&P's Corporate Office must be approved in advance by submitting the request in writing to our Chief Human Resources Officer by e-mailing Lpgives@leggett.com.

General. For all L&P employees who do not directly or indirectly report to an L&P Segment President, such employees shall seek approval of the first Corporate Senior Vice President or higher in their reporting chain in lieu of the L&P Segment President.

Gifts and entertainment must not be lavish or extravagant and must relate to the promotion, demonstration or explanation of products or services or the appropriate building of relationships. No matter what amount, no gifts, entertainment, donations, or charitable contributions may be provided that are in exchange for improper favorable business treatment or improper favorable governmental actions.

Gifts and entertainment received by L&P employees are addressed in the Business Policies Manual.

VII. Record Keeping and Accounting Provisions

The FCPA's record-keeping provisions require publicly held U.S. companies such as L&P to accurately keep their books, records, and accounts in reasonable detail and fairly reflect all transactions and dispositions of assets. The FCPA prohibits the mischaracterization or omission of any transaction on a company's books or any failure to maintain proper accounting controls which could result in a mischaracterization or omission. L&P requires that the branch manager of each L&P facility and each L&P corporate office department head keep a detailed log that reflects accurate descriptions of all third-party gifts (including those below the U.S. \$150 threshold), donations, and charitable contributions provided by such facility, department, or company. In addition, L&P requires that each Third-Party Representative keep a detailed log that reflects accurate descriptions of all gifts (including those below the U.S. \$150 threshold), donations, and charitable contributions provided on behalf of L&P.

No accounting record or other document related to any transaction shall be falsified in any manner which may obscure or disguise the true nature of the transaction. No L&P employee or Third-Party Representative shall engage in any arrangement which results in an inaccurate entry on L&P's books and records. No payment on behalf of L&P shall be approved or made when there is an express or implied agreement that any portion of the payment is to be used for any purpose other than that described by the documentation supporting the payment. Undisclosed or unrecorded funds and accounts are prohibited.

VIII. Penalties

Any L&P employee who does not comply with this Policy or any Anti-Bribery Law shall be subject to disciplinary action, up to and including termination of employment. Any Third-Party Representative who does not comply with this Policy or any Anti-Bribery Law shall be subject to penalties, up to and including termination of our business relationship with such Third-Party Representative, including any relevant agreement(s) and/or order(s), if any, without liability to L&P.

Individuals who violate the FCPA may be subject to penalties up to U.S. \$5,000,000 per violation and may also face up to 20 years' imprisonment. Individual penalties under other Anti-Bribery Laws can be even more significant.

IX. Managerial Responsibility

This Policy is not simply a legal obligation. We established this Policy because we believe in doing business the right way. It is never acceptable to engage in bribery. Our Board of Directors, management, and compliance personnel consider this Policy a critical element of L&P's ethical culture in view of the adverse impact that violations of Anti-Bribery Laws may have, not just for you and our company, but for society as a whole.

Our Board of Directors, through the Audit Committee, and our CEO and CFO, oversee L&P's compliance with Anti-Bribery Laws. Our Chief Compliance Officer, who is also the Senior Vice President – General Counsel & Secretary, leads our anti-bribery compliance efforts, and our VP – Internal Audit & Due Diligence leads our Internal Audit Department, which conducts regular audits of our Global Anti-Bribery Compliance Program. Managers are responsible for ensuring that L&P employees under their responsibility are aware of and comply with this Policy and any applicable legal requirements.

X. Reporting Violations

If you have any questions regarding Anti-Bribery Laws or this Policy, please contact Bonnie Baich (Bonnie.Baich@Leggett.com), Scott Douglas (Scott.Douglas@Leggett.com) or Jennifer Davis (Jennifer.Davis@Leggett.com) in L&P's Legal Department by email or by calling 417-358-8131 (or +1 417 358 8131 internationally) for guidance. Each employee is required to immediately report any suspected violation or issue of concern. If you become aware of any proposed or actual transaction or situation that you believe may violate Anti-Bribery Laws or this Policy, immediately report the situation directly to L&P's General Counsel at:

LEGGETT & PLATT, INCORPORATED
Legal Department
No. 1 Leggett Road
Carthage, MO 64836 USA
Email: legal@leggett.com
Fax: 417-358-8449 (+1 417 358 8449 internationally)

You may also contact L&P's Ethics Hotline by e-mailing legal@leggett.com or by calling the phone number listed on the poster located in your facility. Reports can be made on a confidential and anonymous basis to the fullest extent practicable and allowed by law. **L&P employees reporting suspected violations of Anti-Bribery Laws in good faith will not be subject to retaliation of any kind by L&P. Third-Party Representatives must not retaliate against their employees for reporting concerns to L&P in good faith.**

**GLOBAL ANTI-BRIBERY POLICY
EMPLOYEE CERTIFICATION OF COMPLIANCE**

By signing below or otherwise accepting the Policy through electronic means, I acknowledge the following:

1. I have received, read, and understand the Policy.
2. I understand that I must comply at all times with the Policy, any amendments to the Policy, and all Anti-Bribery Laws, and I agree to do so at all times. Compliance with the Policy is a condition of my continued employment. Failure to comply with the Policy, which includes the requirement to comply with Anti-Bribery Laws, may result in disciplinary action, up to and including termination of employment.
3. To the best of my knowledge and belief, I have complied with Anti-Bribery Laws and the Policy in the past.
4. I am not aware of any noncompliance with Anti-Bribery Laws or the Policy by myself or any other party, or I have reported such noncompliance to the Legal Department or the Ethics Hotline by e-mailing legal@leggett.com or by calling the phone number posted in my facility.

For those reviewing this Policy electronically, please click the button acknowledging your acceptance of this Policy. For those reviewing a hard copy of this Policy, please complete the box below and return this Certification of Compliance. I understand that my failure to accept the Policy electronically or to return this Certification of Compliance does not affect my obligation as an L&P employee to fully comply with Anti-Bribery Laws and with the Policy at all times during my employment.

Date:	
Signature:	
Print Full Name (with middle initial):	
Branch Number:	
Branch Name:	