

**FORTUNE BRANDS HOME & SECURITY, INC.**  
**CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS**

Fortune Brands Home & Security, Inc. (the “Company”) has a Code of Business Conduct and Ethics applicable to all directors and employees of the Company. The Chief Executive Officer, Chief Financial Officer and principal accounting officer of the Company (the “Senior Financial Officers”) are bound by the provisions set forth therein relating to ethical conduct, conflicts of interest, compliance with laws, prevention of fraud and reporting of financial information. The Senior Financial Officers are responsible for the integrity of the Company’s financial reporting and system of internal accounting and controls. The honesty, integrity and sound judgment of each Senior Financial Officer is fundamental to the reputation and success of the Company. The obligations of this Code supplement, but do not replace, the Company’s Code of Business Conduct and Ethics. This Code requires the following:

1. The Senior Financial Officers must deal honestly and ethically with the Company and on the Company’s behalf in all matters, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
2. The Senior Financial Officers are responsible for full, fair, accurate, timely and understandable disclosure in the periodic reports and documents required to be filed by the Company with, or submitted by the Company, to the Securities and Exchange Commission (the “SEC”), as well as in other public communications made by the Company. It is the responsibility of each Senior Financial Officer to promptly notify the Disclosure Committee of any material information of which he or she may become aware that affects the disclosures made by the Company in its public filings or other public communications. Each Senior Financial Officer shall assist the Disclosure Committee in fulfilling its responsibilities as specified in the Disclosure Committee Charter.
3. Each Senior Financial Officer must promptly notify the Disclosure Committee and the Audit Committee of any information he or she may have concerning (a) significant deficiencies in the design or operation of internal controls which could adversely affect the Company’s ability to record, process, summarize and report financial data, (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company’s financial reporting, disclosures or internal controls or (c) other matters which could compromise the integrity of the Company’s financial statements. The Senior Financial Officers must identify to the Company’s auditors any material weaknesses in internal controls.
4. The Senior Financial Officers are expected to comply in all material respects, and to promote compliance by the Company, with all applicable laws, rules and regulations in all activities within the scope of such officer’s responsibilities. Each Senior Financial Officer must promptly notify the General Counsel of any

information he or she may have concerning evidence of a suspected material violation (“Material Violation”) by the Company or its employees or agents of (i) applicable laws, rules or regulations; (ii) the Company’s Code of Business Conduct and Ethics; or (iii) this Code of Ethics for Senior Financial Officers. The General Counsel must investigate this information and, if he or she determines that a Material Violation may have occurred, notify the Audit Committee. Each Senior Financial Officer may, if he or she deems it appropriate, notify the Audit Committee directly of a potential Material Violation.

5. Each Senior Financial Officer must promptly notify the General Counsel of any actual or apparent conflict of interest between personal and professional relationships that would negatively impact the ability of any Senior Financial Officer to comply with its obligations under this Code. The General Counsel must investigate the possible conflict of interest, and if he or she determines that it does negatively impact the ability of any Senior Financial Officer to comply with this Code, notify the Audit Committee. A Senior Financial Officer may, if he or she determines that it is appropriate, notify the Audit Committee directly of any actual or apparent conflict of interest.
6. In the event that the Audit Committee confirms that a Material Violation has occurred, the Board of Directors shall determine any appropriate disciplinary and remedial actions. Such actions shall be designed to deter wrongdoing and to promote accountability for adherence to this Code, and written notice to the Senior Financial Officer involved shall be sent upon any determination by the Board of Directors that there has been a Material Violation. In determining what disciplinary action is appropriate in a particular case, the Board of Directors shall take into account all relevant information, including the nature and severity of the Material Violation, whether the Material Violation was a single occurrence or repeated occurrences, whether the Material Violation appears to have been intentional or inadvertent, whether the officer in question had been advised prior to the Material Violation as to the proper course of action and whether or not the officer in question had committed other Material Violations in the past.

**September 2011**