



SPECIALTY BUILDING PRODUCTS

SUPPLIER CODE OF CONDUCT

Specialty Building Products, Inc. and its subsidiaries (collectively, “SBP”) are committed to conducting business in an ethical, legal and socially responsible manner. SBP expects its suppliers, contractors and consultants (“Suppliers”) to share this same commitment and, as a condition of doing business, requires its Suppliers to follow the principles set forth in this Supplier Code of Conduct (“Code”).

Compliance with Laws is Required: SBP Suppliers must operate their businesses in full compliance with all applicable laws, codes, rules and regulations of the countries, provinces, states, regions and municipalities in which they operate.

Forced and Child Labor is not Permitted: Suppliers shall only utilize workers who have a legal right to work. Suppliers must comply with all age-related working restrictions as set by applicable law. SBP will not tolerate the exploitation or use of children as workers by Suppliers or the use by Suppliers of forced labor in any form, including slave, indentured or bonded labor.

Equal Opportunity, Discrimination and Harassment: Suppliers must provide equal opportunity to employees and job applicants. Discrimination by Suppliers in their hiring and employment practices on the basis of race, color, religion, gender, social and ethnic origin, age, marital status, pregnancy, creed or political belief, disability, sexual orientation or any other basis prohibited by law shall not be allowed. SBP expects its Suppliers to provide a work environment that is free from any form of harassment, including verbal, physical, or sexual harassment. Threats or acts of retaliation or physical punishment by Suppliers against workers will not be tolerated.

Wages and Benefits and Freedom of Association: SBP requires that Suppliers compensate employees in compliance with all laws and regulations relating to minimum wages, overtime, employee benefits, maximum hours worked per day or maximum days worked per week. Suppliers shall recognize and respect the right of workers to join or not join trade unions and to associate freely or organize as permitted by applicable laws and regulations.

Environmental Protection and Sustainability of Resources: Suppliers must only use materials derived from operations that are in compliance with the environmental and social laws and regulations of the country of origin. Suppliers are expected to comply with all applicable environmental laws and regulations and to conduct their business with concern for the environment and environmental impacts, including identifying opportunities for conservation of natural resources and reduction of pollution and waste.

Safety and Health: Suppliers are expected to promote secure, safe and healthy working environments. Suppliers shall have established safety procedures and keep the work environment free from recognized hazards and assure compliance with all applicable laws regarding working conditions.

Data Privacy: Suppliers must protect the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers must comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Anti-Bribery and Financial Recordkeeping: Suppliers shall not engage in bribery, kickbacks, collusive bidding, price fixing or other unfair trade practices. Suppliers must comply with all applicable anti-corruption laws and regulations in connection with their work for or on behalf of SBP. Suppliers are expected to keep accurate records of all matters related to Supplier’s business with SBP, including accurate and proper recording of all expenses and payments.



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Competition and Fair Dealing: Suppliers shall not take any unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice. Supplier shall not engage in price fixing, bid rigging, or similar illegal anti-competitive activities. Conflicts of interest are to be avoided.

Conflict Minerals: Suppliers shall disclose to SBP if they are providing to SBP any “3TG” metals (tin, tantalum, tungsten or gold) that were sourced from the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Congo Republic, Rwanda, South Sudan, Tanzania, Uganda, or Zambia (“Conflict Minerals”). Suppliers are expected to take steps to determine if their products contain Conflict Minerals, and if so, implement policies to identify sources of Conflict Minerals and support efforts to eradicate use of Conflict Minerals.

Product and Service Quality: Suppliers are expected to undertake manufacturing processes and protocols that promote quality and safety. Suppliers must notify SBP of issues that negatively impact the quality of the product or service being delivered to SBP.

Demonstration of Compliance: Supplier must be able to demonstrate compliance with the principles set forth in this Code at the request and to the reasonable satisfaction of SBP. These principles are part of all agreements between SBP and applicable Suppliers. If a Supplier fails to uphold any aspect of these principles, the Supplier is expected to implement corrective actions. SBP reserves the right to terminate any agreement with any Supplier that cannot demonstrate that it is upholding these principles.

Report Violations: Suppliers are expected to promptly inform SBP of any suspected violation of this Code, or any other integrity concern that involves or affects SBP. All reports are treated as confidential, and you may remain anonymous where permitted by law by calling the 24-hour ethics hotline at 1-844-912-0186 or by submitting the concern online at <http://www.sbp.ethicspoint.com>.

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