

# S B P

SPECIALTY BUILDING PRODUCTS



# CODE OF CONDUCT & ETHICS

## Purpose

At SBP, we believe you should always do the right thing – even when it is hard, and this is why we have created this Code of Business Conduct and Ethics (this “Code”).

This Code applies to all officers, employees, suppliers and members of the board of directors (referred to herein as “associates”) of Specialty Building Products, Inc. and our subsidiaries (“SBP” or the “Company”). This Code is designed to provide a broad overview of our values and policies designed to promote honest and ethical conduct. We understand that this Code cannot cover every potential scenario that you may encounter, so it is important for you to remember that in most situations using your own good judgment will lead you to “do the right thing” when presented with a potential ethical issue.

## Our Values

**Specialty Building Products believes that by maintaining a culture based on these Core Values, we are building a high-performance organization that can actually make a difference in our world one person at a time.**

- Always do the right thing, even when it is hard.
- Give credit where credit is due. Most of the credit is not due to you.
- Use your influence to have a uniquely positive impact on people.
- Be consistently responsive to customers and suppliers.
- Develop people by serving the whole person.
- Lead with influence; not position, title or tenure.
- Live with Intentionality. Make Sure Your Progress is on a Well Conceived Path.
- Don't Finish Fresh. Give Everything You Have Every Day.
- Live out Idealism. Don't Settle.

## Complying with the Code & the Law

At SBP, operating with integrity and doing business in an ethical and honest manner is core to who we are. Therefore, all associates of SBP are expected to comply with this Code and follow both the letter and the spirit of all applicable laws and regulations. In the event that this Code conflicts with local law, you should seek management's guidance in finding a resolution.

This Code serves as a source of guidance to follow as we run our business each day. This Code does not constitute an employment contract. Nothing in this Code creates an agreement, promise or representation of continued employment. To the extent any prior handbooks, policies, practices or procedures, whether written or oral, are inconsistent with this Code, this Code supersedes such handbooks, policies, practices and procedures.

Each of us needs to know and understand the policies and guidelines in this Code. If you have questions, ask them. If you have ethical concerns, you are expected to raise them. The Compliance Committee, which is responsible for overseeing and monitoring compliance with this Code, and the other resources set forth in this Code, is available to answer your questions, provide guidance and receive reports of any suspected violations of this Code. The conduct of each associate must reflect the Company's values, demonstrate ethical leadership and promote a work environment that fosters integrity, ethical conduct and trust.

Failure to follow the provisions of this Code can lead to discipline, up to and including termination.



# Code Of Conduct

**Working Safely:** Providing a safe work environment for our employees, vendors and customers is a primary mission for all of us at SBP, as well as our family of brands. We expect all managers and employees to abide by all safety requirements and regulations and endeavor to eliminate unsafe conditions and minimize related risks by identifying and supporting safe work practices, promoting safety awareness, furnishing protective equipment, and providing employee training and education.

**Keeping Our Workplace Safe:** Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities can put our safety at risk. As a result, this type of activity should be reported as soon as possible to a supervisor, Human Resources, or any member of senior management.

**Drug & Alcohol-Free Workplaces:** The Company has a longstanding commitment to provide a safe and productive work environment. Alcohol and drug abuse pose a threat to the health and safety of employees and to the security of our equipment and facilities. For these reasons, it is a violation of Company policy to be under the influence of, use, sell, transport, promote or conceal prohibited drugs, drug paraphernalia or alcohol on company time or property, unless attending an event where alcohol is being served by the company.

**Treating Everyone with Respect:** SBP is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, the Company expects that all relationships among persons in the office will be business-like and free of bias, prejudice and harassment.

**Prohibiting Retaliation:** Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious matter and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation against anyone who reports a good faith concern is prohibited and will not be tolerated. Allegations made maliciously in bad faith may be subject to disciplinary action.

**Respect in the Workplace:** All employees, customers, vendors and business associates must be treated with courtesy and respect at all times. Conduct that threatens, intimidates or coerces another associate, customer, vendor or business associate will not be tolerated.

**Equal Opportunity:** We seek to foster a workplace that embraces differences in viewpoints, cultures, race, and gender. Our differences can help make us a stronger team and the diversity in our opinions and ideas makes us better able to serve our customers. Because of this, we provide equal employment opportunities to all employees and applicants for employment without regard to race, religion, gender, national origin, age, disability, or other status protected by federal, state and local laws. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

**Protecting Our Assets:** Company assets are provided to enable our business and to empower us in working on behalf of SBP. Associates are responsible for taking care of these assets, safeguarding Company information and protecting the viability of our business. Associates are prohibited from using or taking Company assets for personal gain or advantage, or for the advantage of friends or family members.

**Conflicts of Interest:** To operate an ethical business, it is important that we never advance our personal interests at the expense of the Company's interests. We have a responsibility to make decisions based on the interests of SBP without regard to how we might personally benefit. We should also avoid the appearance of a conflict of interest as the perception of a conflict by others can be just as damaging to you or the Company as an actual conflict of interest. To ensure there is never any impropriety in our business dealings, it is your responsibility to disclose any known or potential conflicts of interest, whether actual or perceived, to your supervisors or Human Resources.

**Environmental Responsibility:** We pursue environmentally sound business practices and beyond complying with applicable laws, regulations, and other environmental standards and guidelines, we seek to lead in a responsible and sustainable manner. Further, we are all accountable for reporting any practice that is harmful to the environment, is unsafe, or does not comply with our Company's policies, applicable laws, or any other rule or regulation.



**Ethical Competition:** We are committed to dealing with our customers, suppliers, employees and competitors ethically and lawfully in order to reinforce our reputation in the marketplace and ultimately be successful. It is therefore the responsibility of each employee to ensure that our efforts in the marketplace are conducted in accordance with the letter and spirit of applicable antitrust and competition laws.

**Corruption & Bribery:** Associates must abide by the laws established in the U.S. Foreign Corrupt Practices Act (FCPA) and any other anti-corruption or anti-bribery laws that apply to the Company. Bribery is illegal and subject to criminal penalties in the United States and many other countries. You may not give any bribes or kickbacks to any person or organization for any reason.

**Financial Integrity & Reporting:** We have a relentless focus on ensuring our business records, reports and disclosures to regulatory authorities and the public are accurate, complete and understandable, for the benefit of both our internal decision makers as well as our shareholders, investors, regulators and others who rely on them. All Company business transactions must be properly authorized and be accurately recorded and described in the Company's books and records in accordance with generally accepted accounting principles and established Company financial policy. Compliance with accounting procedures and internal control procedures is required at all times.

**Confidentiality, Privacy & Information Protection:** It is our policy that all customer, supplier and industry information considered confidential will not be disclosed to external parties or to associates without a "need to know." This policy is intended to alert associates to the need for discretion and is not intended to inhibit normal business communications.

**Gifts & Entertainment:** We must always remember our responsibility to make decisions based on the interests of SBP without regard to how we might personally benefit. This includes the acceptance of gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, if it benefits the associate and could in any way disadvantage the Company. Employees should never solicit gifts, personal favors or entertainment from suppliers or partners. If a gift is offered, associates must consider the value of any gifts given or entertainment hosted to ensure it is appropriate and not excessive.

**Engaging in Social Media:** Social media platforms are changing the way people work and engage with each other, customers, and partners. As a company we want to encourage our associates to engage in these platforms in a thoughtful and professional manner, adhering to all relevant company policies.

Even if your social media activities take place completely outside of work, as your personal activities should, what you say can have an influence on your ability to conduct your job responsibilities, your teammates' abilities to do their jobs, and our business interests.

**Use of Company Supplied Technology:** Company-provided equipment (e.g., cell phone, laptops, computers), internet, and services may not be used for transmitting, retrieving or storing any communications of a discriminatory, harassing or pornographic nature. All Company-supplied technology and Company-related work records belong to the Company and not to the associate. The Company routinely monitors use of Company-supplied technology.

## Reporting Concerns and Asking Questions

SBP provides several options to ask questions about or raise a concern or report a suspected violation of this Code, Company Policies or applicable laws and regulations. Depending on your question or concern, often it is best to speak first with your immediate manager or supervisor. If you feel uncomfortable talking with your immediate supervisor for any reason, the following resources are also available to you:

Contact an HR representative or member of senior leadership

**Call the 24-hour Ethics Hotline at 1-(844) 912-0186 or submit a question or concern online at <https://www.sbp.ethicspoint.com>, where you can choose to remain anonymous**

*It is important to report all potential Code violations promptly, completely and honestly. Anyone who in good faith reports an issue, concern or instance of apparent misconduct will not be reprimanded or penalized for doing so, even if it turns out that there was no violation of this Code or the law. Retaliation against persons who report good faith concerns is prohibited and will not be tolerated. Good faith concerns are honest and accurate to the reporter's knowledge, regardless of whether the reporter discovers at a later date that he or she was mistaken. However, anyone who makes a report with malicious intent or in bad faith may be subject to disciplinary action up to and including termination of employment.*