



CODE OF CONDUCT

A Message from our Chairman and CEO



Integrity matters. It matters to our customers, our employees, our partners, our shareholders and the communities in which we live and do business.

And it matters greatly to me.

Our Company has worked hard, literally over generations, to build a reputation of trust, strength, and integrity around every interaction. And we maintain these core beliefs even when no one is there to see our decisions or behaviors.

As individuals, and as a collective team, we are expected to conduct business ethically and legally at all times. That includes employees at every level of the organization. We're also expected to ask questions when we're not sure what's right or wrong and to raise concerns if we see or hear something that's not aligned with our *Core Values*.

Please take a moment to read the Code of Conduct in its entirety to make sure you're familiar with, and are committed to adhering to, the topics outlined in this document.

At Cornerstone Building Brands, our Code of Conduct is not optional. It's built into the fabric of everything we do. It affects our decisions and behaviors on a daily basis and helps ensure our success for the generations to come. Thank you for your attention and for adhering to the Cornerstone Building Brands Code of Conduct.

Sincerely,

James S. Metcalf
Chairman and CEO
Cornerstone Building Brands



Our Purpose, Mission and Core Values

Our Purpose

Our building solutions are the cornerstone of the communities we serve. We believe every building we create, and every part of that building, positively contributes to communities where people live, work and play.

Our Mission

We are relentlessly committed to our customers and to creating great building solutions that enable communities to grow and thrive. By focusing on operational excellence every day, creating a platform for future growth and investing in market-leading residential and commercial building brands, we deliver unparalleled financial results.



Our Core Values



Safety

Safety is an essential part of our culture. We approach each day with careful attention to the well-being of every individual. From the moment we leave home to the time we return, we take personal responsibility for our safety and the safety of those around us.



Integrity

We are honest and accountable in our actions with one another and with all our stakeholders, and we strive to build trust at every opportunity. Our commitment to doing what's right underscores everything we do each day.



Innovation

We challenge the status quo and proactively seek opportunities for continuous improvement and transformative breakthroughs. We develop products and solutions to meet our customers' evolving needs and improve communities through our commitment to environmental sustainability.



Teamwork

We work side by side to create an environment of collaboration and mutual respect. Our backgrounds are as varied as our talents, and we stand together as one winning team whose diversity reflects the communities we serve.

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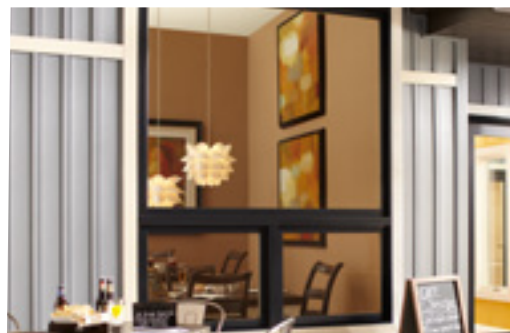
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HELPFUL RESOURCES



Our Code of Conduct

We believe that a common set of principles will guide each of us to make good business decisions. Our stakeholders will come to know us for our consistent application of these ethical standards.

Why We Have a Code of Conduct (“Code”)

Our Code and our *Core Values* convey our strengths and create a solid foundation for ethical business behavior and for protecting our reputation for integrity.

From time to time we all face difficult business decisions. At Cornerstone Building Brands (the “Company”) many resources are available for help; we can rely on one another, on our supervisors and on technical experts throughout the Company.

Our *Core Values* provide a foundation for our decisions and our Code sets our expectations on how to apply our *Core Values* to situations we may face. Our Code also summarizes our policies and the laws and regulations we must follow.

Using our Code

Our Code applies everywhere we do business. If there is a conflict between the requirements of the Code and applicable laws, customs or practices in a particular area, consult with the Legal or Compliance Department to determine the best course of action. If you are covered by a Collective Bargaining Agreement (“CBA”), in some circumstances you may need to follow provisions of the CBA which could supersede provisions in this Code. If you have questions, consult with the Legal or Compliance Department.

Of course, the Code cannot cover every situation. If you need additional information or guidance you can contact any of the resources listed throughout the Code. Your business unit or department may adopt further guidance which applies specifically to the situations you may face.

Violations of this Code, our policies, laws or regulations can result in serious consequences for you and for the Company. Anyone violating this Code will be subject to appropriate disciplinary action, including possible termination of employment. In addition, the Company will take corrective action to help prevent future occurrences.

Who Must Follow the Code?

All officers, directors and employees of Cornerstone Building Brands and all its subsidiaries must follow our Code as well as related policies and procedures.

We also require anyone acting on our behalf, including contractors and consultants, to conduct themselves in a manner consistent with our Code, the law, applicable policies and their contractual obligations.

Our Code of Conduct

Our Expectations

We all have a role to play in meeting our standards for ethics and compliance and protecting the reputation of Cornerstone Building Brands. Doing the right thing means doing it right every time, in every situation and with everyone we interact with.

Employee Responsibilities

- Know and follow this Code, policies, laws and regulations – especially those that apply to your job.
- When in doubt ask questions and report concerns.
- Work as a team and treat others with respect.
- Cooperate and be truthful when responding to an investigation, inspection or audit.
- Complete all required ethics and compliance training.

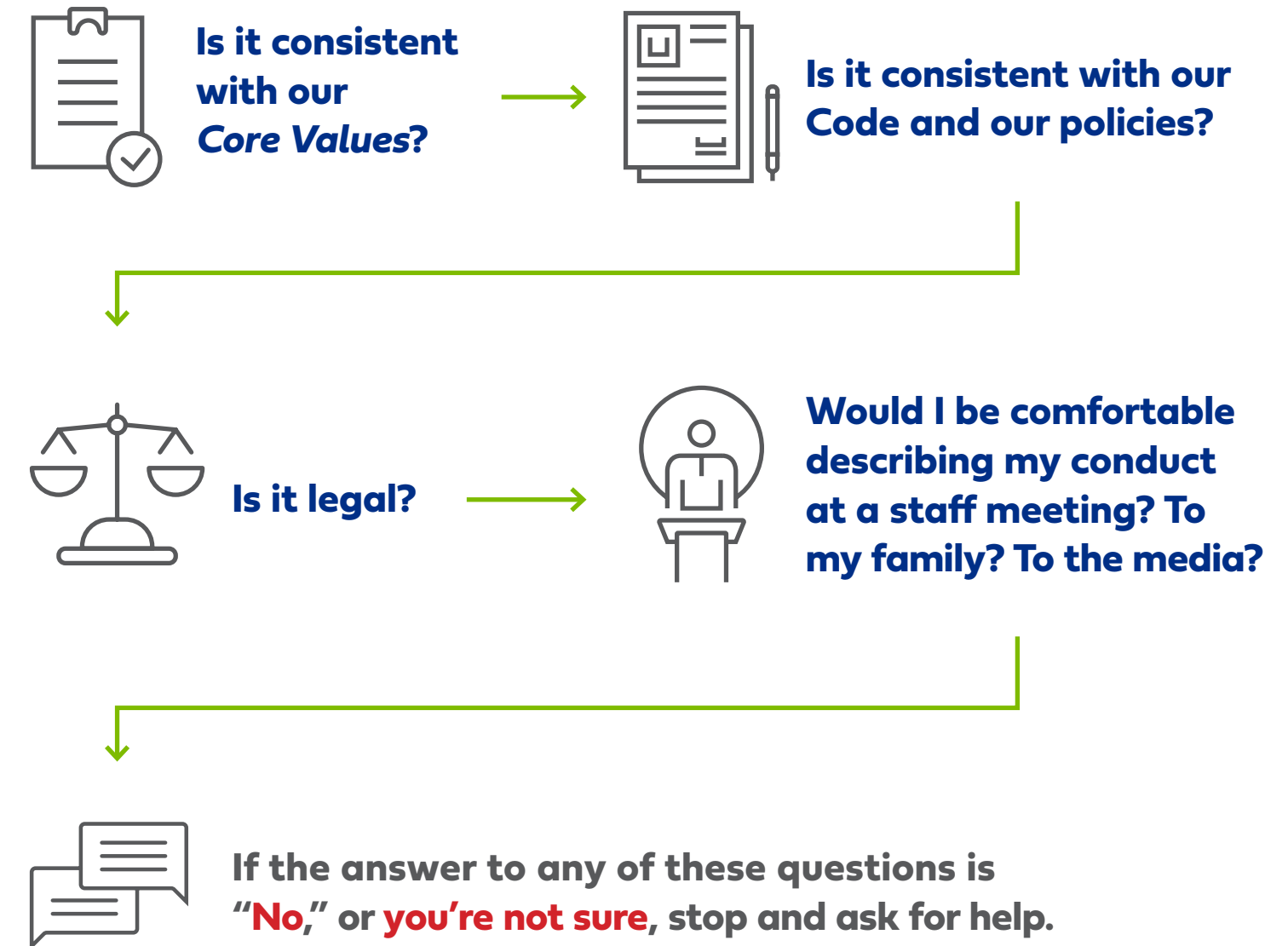
Leaders Have Additional Responsibilities

If you are a leader or supervisor, you have additional responsibilities:

- Be an example for others to follow.
- Set clear expectations for your work groups and help employees understand their responsibilities.
- Be approachable. Maintain an environment where others can comfortably ask questions or raise concerns.
- Be consistent when enforcing our standards and holding people accountable.
- Never ask or pressure anyone to do something you would feel uncomfortable doing or are prohibited from doing yourself.
- If you work with third-parties, make sure they understand our expectations and their obligations.

Guidelines for Ethical Decision-Making

At times, we all need help to determine the best solution to a problem. If you are faced with a difficult decision, ask yourself the following questions:



Our Code of Conduct

Raising Questions and Concerns

Your conduct can reinforce an ethical atmosphere and positively influence the conduct of your coworkers. If you witness or hear about suspected misconduct, you have an obligation to report the matter as described in the Code.

When you ask questions or report concerns, you are giving us an opportunity to address problems early and make any needed improvements.



Getting Help

In most cases, your immediate supervisor should be your first point of contact. However, if you're uncomfortable speaking with your immediate supervisor, if they are unable to answer your question, or if you have already shared a concern and believe it's not being addressed, you have additional options.

Who to Contact

- Contact any other leader within your reporting structure
- Contact [Human Resources](#)
- Contact the [Legal or Compliance Department](#)
- Contact the **INTEGRITY HELPLINE**
 - Through the internet at [Cornerstonebuildingbrands.ethicspoint.com](https://www.ethicspoint.com)
 - Call using the appropriate numbers in the [Helpful Resources](#) section



What to Expect When You Use the Integrity Helpline

The [Integrity Helpline](#) is a confidential way to report possible violations of the Code or any policies, laws, rules or regulations. You may use the Integrity Helpline 24 hours a day, 7 days a week. The Integrity Helpline call center is staffed by third-party ethics and compliance specialists. When you contact them the operator will listen, ask questions if necessary, and then write a summary report. The summary will then be provided to Cornerstone Building Brands for assessment and further action.

You can call anonymously, where allowed by local law. It is important to provide as many details as possible (e.g., who, what, when, where). Since additional information may be needed, you will be assigned a report number allowing you to call back at a later date to answer any follow-up questions.

Our Code of Conduct

Employees covered by a CBA may be required to report certain issues in accordance with specified procedures, for example issues related to pay, benefits and working conditions.

Retaliation Is Not Tolerated

We will not tolerate retaliation against anyone who reports a concern in good faith. We take claims of retaliation seriously. If you believe you have been retaliated against, you should raise your concern as described in the [Getting Help](#) section. Such claims will be investigated, and if substantiated, retaliators will be disciplined up to and including termination.

Investigations

Information provided through the [Integrity Helpline](#) or otherwise, will be treated confidentially to the extent permitted by law. If an investigation is needed, it will be handled by appropriate Company personnel. Failure to cooperate in any investigation may result in disciplinary action.

Where necessary, we will report conduct that appears to be criminal in nature to the appropriate authorities and cooperate fully with any resulting investigation.

Reporting in “Good Faith”

Making a report in “good faith” means you report truthfully and honestly about the facts and information that led to your concern, regardless of whether the investigation of your report uncovers any actual misconduct.



Our People

Our success starts with our people. We succeed when we work as a team, are committed, innovative and accountable.

Health and Safety

Nothing is more important to us than providing a safe work environment. We are committed to eliminating all incidents, injuries and job-related illnesses and addressing all safety risks.

Our Expectations

Remember that safety is everyone’s responsibility. Always maintain the highest safety standards and comply with all applicable policies and laws, including applicable job safety procedures. Violence, threats and unauthorized weapons are not allowed.

Be alert and fit for work. Do not work under the influence of alcohol, controlled substances or illegal drugs. Do not attempt to work if you are unable to perform your job safely or if your condition compromises your safety or those around you. This includes side effects resulting from legally prescribed medications.

Watch out for each other. Never tolerate others who ignore or bypass safety standards. Help make sure that those who work with you including other employees, contractors and third-parties, act consistently with our safety standards.

Ask questions. Report problems. If you have any questions about safety-related laws, safety policies or procedures, or possible health and safety hazards, discuss the matter with your Safety representative or refer to the [Getting Help](#) section of the Code.



Q&A

Q: I’ve noticed some practices in my area that don’t seem safe. Who can I speak to? I’m new here and don’t want to be considered a troublemaker.

A: It is your obligation to discuss your concerns with your supervisor. Raising a concern about safety is never viewed as causing trouble – it is being responsible. If your concerns are not resolved by notifying your supervisor, contact any of the other resources listed in this Code.

Q: My supervisor asked me to operate a forklift. I don’t feel I’ve been adequately trained on the machine, and I’m worried that I might cause damage.

A: Let your supervisor know that you are uncomfortable operating the machinery. They may not be aware of your situation. As a rule, you should never operate machinery unless you are properly trained and are sure that you can do so safely.

Our People

Workplace Equality and Inclusion

We work best when we work together as a team, when we treat each other with respect and value the unique contributions of others.

We are committed to diversity and equal employment opportunity.

We prohibit discrimination based on age, race, sex, sexual orientation, color, creed, religion, national origin, marital status, veteran’s status, handicap or disability.

Our Expectations

Treat others with respect.

Offensive messages, comments and inappropriate jokes are inconsistent with our *Core Values* and are never acceptable.

Don’t tolerate harassment.

Harassment can be verbal, physical or visual and can include unwelcome touching, rude gestures, offensive emails or other disrespectful conduct. Never tolerate physical or verbal intimidation, bullying, unwelcome sexual advances, inappropriate comments or other disrespectful conduct.

Help create a positive work environment for everyone.

Do your part to create a work environment where everyone feels respected and valued and where they can contribute and fully utilize their talents.



For more information
[See our Equal Employment Opportunity Policy and our Policy Against Discrimination and Harassment](#)



Q&A

Q: While attending a conference, a coworker repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked them to stop, but they wouldn’t. We weren’t at work and it was “after hours,” so I wasn’t sure what I should do. What should I have done?

A: This type of conduct is not acceptable, neither during working hours nor any work-related situations including business trips. Since you’ve already tried a direct approach and asked them to stop, you should notify your immediate supervisor, Human Resources or the Integrity Helpline.

Q: A group of coworkers often tells jokes and makes comments about race, religion and certain nationalities. Everyone can hear them in the breakroom and it makes a lot of us uncomfortable, but no one has spoken up about them. What should I do?

A: You should first consider asking them to stop. You can also report your concerns to your supervisor, to Human Resources or use the Integrity Helpline. Offensive jokes and comments violate our *Core Values* as well as our policies. By doing nothing you are condoning behavior that is potentially discriminatory and can seriously erode the team environment we have all worked hard to create.

Our Company

Each of us must do our part to protect the reputation of Cornerstone Building Brands. We are responsible for protecting Company assets and information while maintaining accurate and complete records.

Our Assets and the Assets of Others

Each of us is entrusted with the care of Company assets. We all must do our part to protect these assets from loss, damage, theft, waste and improper use. We must also protect the assets of others. This includes only using licensed software.

Our Expectations

Take precautions to protect our assets. Protect our assets as if they were your own and safeguard them from loss or theft. Use Company assets only for business purposes. Secure your office, workstation and equipment by locking items or completely shutting down systems.

Be prudent. When purchasing supplies and other Company assets, always follow our established procurement procedures.

Follow our information systems policies. Follow all Company policies and practices that are designed to protect our information networks, computers, programs and data from attack, damage or unauthorized access.

- Protect your user names and passwords.
- Do not open suspicious links in emails, even if you think you know the source.
- Report any equipment that is damaged, unsafe or in need of repair.

Our email, information systems and internet access are the property of the Company, as are all correspondence and material contained on these systems.

Cornerstone Building Brands' Assets Include:

Physical – Facilities, vehicles, furniture, equipment and supplies

Information – Data including cost and pricing, databases, reports, files, drawings and plans, records, intellectual property including trademarks and logos

Financial – Company funds including checks, credit cards, invoices and other records that serve a monetary value

Electronic – Computers, electronic storage devices, telephones, information systems, internet/intranet access, personal digital assistants, and other similar devices, systems and technology



Q&A

Q: I have an online business that I operate from home usually on the weekends. On days when I finish lunch early, can I use my work computer to process orders from the previous day?

A: No. Our policies prohibit you from doing personal business on our information systems. You must run your home business only at home, using your own computer and systems.

Our Company

Confidential Information

It is important that we protect confidential Company information, including intellectual property. We must keep it secure and protect it from loss, misuse, or inappropriate access or disclosure. Immediately report any theft, loss or unauthorized disclosure of confidential information.

Our Expectations

Only share on a need-to-know basis. Share confidential information only with those who are authorized and need it to do their jobs.

Be careful when creating and storing information. Properly label confidential information to indicate how it should be handled, distributed and destroyed.

Use good judgment when discussing confidential information. Never discuss confidential information when unauthorized persons might be able to overhear what is being said. For example, never have such conversations on elevators, in visitor or common areas, or when using mobile phones in non-private spaces.

Confidential Business Information

Confidential means any information that is proprietary, not publicly known or is subject to restrictions on how it can be shared. Although it is impossible to list all of our confidential information, examples include:

- Unannounced products
- Trade secrets and intellectual property
- Earnings and other financial information that are not publicly disclosed
- Procurement plans
- Prices and volume discounts
- Capital requirements
- Business plans
- Business or supplier negotiations
- Marketing and service strategies
- Personnel or other personally identifiable information



Our Company

Accurate Financial Reporting

Regulators, investors and others rely on our books and records. Accurate and honest information is also essential within the Company so that we can make informed business decisions.

Our Expectations

Be accurate. Provide information that is complete, timely and clear. All transactions should be supported by proper documentation and in compliance with our internal controls. Make sure that financial entries including expense reports and time sheets are clear and complete and do not hide the true nature of any transaction.

Be truthful. Never falsify any transactions or record any misleading entries. Never record false sales, shipments, or record them early, understate or overstate known liabilities and assets, or defer recording items that should be expensed. Do not create undisclosed accounts for any reason.

Manage records responsibly. Know and follow our policies related to handling, storage and disposal of records. If you receive a legal hold notice, follow its instructions on maintaining the information.



Q&A

Q: My supervisor asked me to record an entry which will result in a possible misstatement of the value of an asset on our books. Should I do what she asks?

A: No. You may not knowingly misstate the value of an asset. Doing so would be a misrepresentation. It could be fraud. You need to discuss your concern with your supervisor but if you are not comfortable doing so, seek immediate help using any of the other resources listed in the Code or contact the Integrity Helpline.



Sharing Information

We have a responsibility to be honest and transparent about our operations and performance and to protect confidential and private information.

Communicating Externally

It is important that Cornerstone Building Brands speaks with one clear and consistent voice when providing information to the public and the media. For this reason, only certain employees may speak publicly on behalf of the Company.

Our Expectations

Never speak publicly on behalf of the Company. Unless you are authorized to do so, never give the impression that you are speaking on behalf of Cornerstone Building Brands in any communication that may become public.

Handle requests for information appropriately.

If you receive an outside inquiry about the Company from the financial press, investment analysts or others in the financial community, you should decline to comment, provide no information and immediately notify the Chief Financial Officer. If you are contacted by a regulatory agency regarding our business, immediately notify our Legal Department.

Social Media and Electronic Communications

Social media is a great way to connect with people and potential customers, but always be careful when writing anything that might be published online. Always assume the whole world can read your posts.

- Do not post confidential information about the Company, fellow employees or our business partners.
- Be careful when listing Cornerstone Building Brands as your employer on any social media site, with the understanding that your social media activity may have an impact on our business.
- Take responsibility for what you post and never engage in activity online that would be unacceptable in person.

Practice common sense, keep all internal and external electronic communications professional and consistent with our *Core Values* and policies.



Q&A

Q: Someone posted a claim on an online social network about the Company that I know is false. I think it's important that we correct the misinformation. Is it acceptable if I go ahead and post a response?

A: No. While it may be tempting to correct the information and engage with the source of the misinformation, you should instead follow the [Getting Help](#) section in this Code to ensure the necessary steps are taken.

Sharing Information

Personal Information and Privacy

People inside and outside the Company trust us to handle their personal information with care and to only use it for legitimate business purposes.

Our Expectations

Respect the privacy of others. Keep private, personal information safe and secure. Respect the privacy of employees, as well as customers and business partners.

Understand and follow data privacy laws. Data privacy laws cover how we must collect, store, use, share, transfer and dispose of personal information. These laws are complex and vary significantly depending on the state or country. If you work with personal information be sure to understand and follow the laws that apply.

Do your part to help us keep information safe. Use personal information only for the legitimate business purpose intended. Always handle private information with care, follow our policies and protect any personal information that is entrusted to you. If you observe any personal information being handled inappropriately, report it.

Be smart. To the extent permitted by law, the Company may monitor and review anything you write, download or store on our systems or transmit on our network.

Personal Information

Generally, personal information includes data that can be used to identify a specific person. This includes information such as a personal address, personal phone number, photo, birth date, personnel files, driver's license number, banking or payroll information, government-issued identification information, medical condition or history, or other personal information revealing race, ethnicity, religion, gender, age, mental or physical disability, military service, national origin, sexual orientation or any other characteristic protected by applicable law.



Sharing Information

Insider Trading

In the course of your work, you may become aware of “inside information” about Cornerstone Building Brands or other publicly traded companies. Using this information for personal gain or sharing it is not only unethical, it is illegal.

Our Expectations

Understand and follow the law and our policies. Never buy or sell any stocks, bonds, options or other securities of any public company including Cornerstone Building Brands, based on “inside information.”

Do not “tip” others. Never pass inside information to friends and family so that they can take advantage of the information. This, too, is illegal.

Definitions

Inside information is information that a reasonable investor would find useful in determining whether to buy, sell or hold a stock or other security and that **has not been released to the public**. Inside information may be information that could be perceived as either positive or negative.

Information is **“material”** if there is a substantial likelihood that a reasonable person would consider the information important in making a decision to buy or sell securities.

Information is **“nonpublic”** until one full business day after it has been widely disseminated to the public through a press release and/or a report made to the U.S. Securities and Exchange Commission.



For more information
[See our Insider Trading Policy](#)



Working with Others

Successful business relationships are key to our success. We expect our business partners and employees to always act in accordance with laws and regulations, and to meet the highest ethics and compliance standards.

Supplier and Third-Party Relationships

The actions of our business partners have a direct impact on our business. They are a key contributor to our success, but their actions can also harm our reputation and expose us to legal risks.

Our Expectations

Avoid potential conflicts. Select suppliers and business partners based on their capabilities following clear, consistent and objective criteria. Be sure to avoid even the appearance of a conflict of interest when selecting suppliers.

Be fair and honest. Never take unfair advantage of our business partners through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing or practice.

Maintain our high standards. If you work with suppliers and business partners, be certain they:

- Understand and follow all relevant laws and regulations including those pertaining to safety, environment, corruption and labor practices.
- Meet their contractual obligations.
- Act in a manner consistent with our *Core Values*.

Gifts and Entertainment

Giving or receiving an occasional gift or offer of entertainment with a customer, supplier or business partner is often viewed as a normal part of doing business, but sometimes even a well-intentioned gift or entertainment can cross the line or create the appearance of a conflict of interest.

Our Expectations

Use good judgment. Unless you have prior approval, gifts and entertainment should always be modest in value (generally US \$150 or the local equivalent), not frequent and there should always be a clear and appropriate business purpose. Gifts and entertainment should never be in the form of cash or cash equivalents or intended to improperly secure something in return.

Be careful when dealing with government employees. Dealing with government employees is often different than dealing with commercial employees. Many governmental bodies strictly prohibit the receipt of any gratuities by their employees. Always obtain permission before giving anything of value to a government employee.



Working with Others

Conflicts of Interest

A conflict of interest may occur when your personal interests affect your ability to make objective decisions on behalf of Cornerstone Building Brands. You must disclose and avoid all conflicts including situations that create even the appearance of a conflict to others.

Our Expectations

Be objective. Use good judgment and make sure that nothing interferes with your ability to make business decisions in the best interest of Cornerstone Building Brands.

Be proactive – know, avoid and disclose. Be vigilant about situations which may create a potential conflict and avoid them as best possible. If you find yourself in a potential conflict of interest, talk with your supervisor and seek approval prior to proceeding.

Understand the risks. It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts are more common. Here are some examples:

- **Financial interests** – If you have more than a modest financial interest in one of our vendors or customers, it could give the impression that your decisions may be affected by your financial interests.
- **Business with relatives** – Hiring, promoting, supervising or engaging in business transactions with a family member or a close friend.
- **Outside employment and serving on boards** – Taking an outside job or serving on a board that interferes with your work, or at a company that is a supplier, a competitor or any organization that does business with Cornerstone Building Brands.
- **Outside opportunities** – Pursuing business opportunities for yourself that you discover through your work at Cornerstone Building Brands.



Working with Others

Competition

We believe in a competitive marketplace. Competition or antitrust laws are intended to ensure that competition is open, fair and in the best interest of the public.

Our Expectations

Be careful. Use extreme caution in any communications or meetings with competitors. Never develop any written, verbal or indirect agreement or understanding with a competitor, or discuss pricing, marketing or other competition practices with them without consulting the Legal Department first.

Competition or antitrust laws are complex, if you are unsure – ask.

Competition compliance requirements can vary depending on the circumstance. If you have any doubt about the legality of an action, contact the Legal Department as soon as possible.

Antitrust “Red Flags”

The following activities are examples of “red flags” and should be avoided and reported to the Legal Department:

- Fixing prices or coordinating pricing with other organizations at an agreed-upon level
- Allocating markets, geographies or customers among competitors
- Rigging bids with another organization, such as agreeing which party should win a bid or exchanging bid prices
- Reciprocal dealing with customers or suppliers
- Setting product terms or agreements with competitors



Q&A

Q: We recently hired a new employee who previously worked for one of our competitors. She says she has confidential information about pricing from her previous job that can be useful to us. Is it OK for me to look at the information and use it to our advantage?

A: No, it is not. We need to respect the confidential information of our competitors, business partners, third-parties and suppliers just as we expect them to respect our confidential information. Explain to the new employee that we cannot use the information.

Q: I will be attending a trade association meeting, and I’m worried that my discussions may violate antitrust laws. I’m not sure what I can and cannot discuss. What should I do?

A: You are right to be concerned, but the situation can be managed. Trade association meetings are an excellent way to stay informed and connected, but since they bring together competitors, they can lead to antitrust violations. Before the meeting, discuss your concerns with our Legal Department. You can review the agenda and discuss who might be there and what topics may come up. When you are at the meeting, if a discussion begins that may involve inappropriate topics, stop the conversation, break away and promptly inform our Legal Department.

Working with Others

Anti-Corruption

Always work honestly and with integrity. Never offer or accept a bribe or kickbacks from anyone.

Key Definitions

A **bribe** is anything of value that is given to influence the behavior of someone in government or the private sector in order to obtain a business, financial or commercial advantage.

A bribe can be something other than cash. A gift, a favor, an offer of a loan or a job, even if it does not succeed in its intended purpose, could be considered a bribe.

Facilitation payments are typically small payments to a low-level government official that are intended to encourage the official to perform their responsibilities.

A **government official** includes anyone who works for or is an agent of a government-owned or government-controlled entity. This includes elected and appointed officials of national, municipal or local governments. It also includes officials of political parties and candidates for political offices, as well as employees of a government or a state-controlled company.

Our Expectations

Understand and follow the law and our policies. Anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), are very strict and must be followed. Do not give or accept bribes or kickbacks, or accept or provide any other kind of improper payment. Facilitation payments are prohibited. If a facilitation payment is requested, report the request to the Legal Department as soon as possible. If you fear your health or safety may be harmed if you do not pay a demanded bribe or facilitation payment, you may make the payment. Report the situation to the Legal Department as soon as possible after the payment is made.

Keep accurate books and records. Accurate records are essential so that payments can be honestly described and documented. Never mis-classify, split or in any way distort or disguise the true nature of any transaction.

Monitor third-parties. We are not only responsible for our actions, but also for the actions of any third-party who represents Cornerstone Building Brands. Exercise due diligence to ensure we do not do business with third-parties who have a reputation for questionable business practices. Be vigilant and monitor the behavior of anyone doing business on our behalf.



For more information
[See our Anti-Corruption and Trade Compliance Policy](#)

Working with Others

Government Customers

Special legal and contracting rules apply to our dealings with governments. These include bidding or procurement requirements, special billing and accounting rules, and restrictions on subcontractors or agents we may engage.

Our Expectations

Understand and follow the law and our policies. If you deal with domestic or foreign governments, know the laws that are applicable to these business activities, use sound judgment to avoid any violations of the letter or spirit of the laws, and contact the Legal Department if you have any questions.

Never pay or accept a bribe from a government official. Any employee, officer or director who pays or receives bribes or kickbacks will be immediately terminated and reported, as warranted, to the appropriate authorities. A kickback or bribe includes any item intended to improperly obtain favorable treatment.

Trade Controls

Many laws govern the conduct of trade across borders, including laws that are designed to ensure that transactions are not being used for money laundering. Other laws prohibit companies from cooperating with unsanctioned boycotts and others regulate imports and exports. We are committed to complying with all such laws.

Our Expectations

Understand and follow the law and our policies. If you are involved in international operations or the import or export of our products, it is especially important that you know and comply with the requirements associated with the countries in which you do business. Contact the Legal Department if you have any questions.



For more information
[See our Anti-Corruption and Trade Compliance Policy](#)

More Information – Boycotts, Import/Export Laws, Money Laundering and Sanctions

Never participate in or promote **economic boycotts** that the United States government does not support. If you receive a request to participate in one or if you receive a question about our position on the matter, contact the Legal Department immediately.

Import laws and regulations govern the importation of goods. Such laws ensure only admissible goods enter the importing country, and that the correct amount of duties and taxes are paid on those goods. **Export control laws** govern the transfer of goods, services and technology to another country. Export controls govern many types of exchanges of information across national borders, including email transmissions and web access to different servers that could contain export controlled technical data. The U.S. also controls the transmission of certain export controlled technical data to non-U.S. persons within the United States.

Money laundering is the process by which illegally obtained funds are moved through the financial system to conceal their criminal origin. Check for “red flags” such as requests from a potential customer or supplier for cash payments, payments to/from off-shore accounts or other unusual payment terms or practices. If you suspect money laundering activities, contact our Legal Department.

The U.S. maintains a list of **sanctioned countries**. The sanctions can be either comprehensive or selective. They are used to block the assets and impose trade restrictions to accomplish foreign policy and national security goals.

Our Community

Our building solutions are the cornerstone of the communities we serve. Our contributions to those communities make a positive impact where people live, work and play.

Serving our Communities

Employees are encouraged to take an active role in their communities and also to participate in Company-sponsored activities.

Our Expectations

Represent the Company consistent with our *Core Values*. When you are representing the Company, always demonstrate an ethical and professional demeanor.

Avoid conflicts of interest. If you volunteer to help charitable organizations, be sure that your participation does not interfere with your work responsibilities.

Do not solicit or pressure others. Never solicit or pressure business partners or other employees to support your favorite charities or causes.



Political and Charitable Activities

Laws and regulations place numerous restrictions on the Company's role in political activities and funding. The Company will only participate in political activities when appropriate, when approved by authorized Company representatives and in accordance with applicable laws. Any charitable contribution must be approved in accordance with the limits and restrictions established in our policies.

Our Expectations

Understand and follow the law and our policies. Unless you are authorized to do so, never make political campaign contributions on behalf of Cornerstone Building Brands, and do not engage in any political advocacy or "lobbying" activities.

Keep your politics separate from work. We believe in the rights of our employees to participate in the political process, but if you choose to be politically active:

- Do so as an individual citizen on your own time and at your own expense.
- Identify your political statements as yours and not the Company's.
- Never pressure others to contribute to, support or oppose any cause, political candidate or party and do not solicit contributions or distribute political literature during work hours.

Our Community

Human Rights

We are committed to respecting the human rights and dignity of everyone. We will not tolerate abuse of human rights in our operations or in our supply chain.

Our Expectations

Understand and follow the law and our policies. Comply with all applicable laws pertaining to fair employment practices as well as laws prohibiting forced and compulsory labor, child labor, employment discrimination and human trafficking.

Report possible violations. If you have any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners, report your concerns to your supervisor or use any of the reporting channels in this Code.

Respect human rights – every day.

Respect for human dignity begins with our daily interactions with one another and with our business partners. It also includes promoting diversity and inclusion, accommodating disabilities and doing our part to protect the rights and dignity of everyone with whom we do business.



Environment

We are committed to complying with all relevant environmental laws, and we work to continuously improve our conservation efforts.

Our Expectations

Maintain our standards and comply with requirements. Those who are involved with processes that affect the environment must follow all environmental requirements and laws. If you become aware of any violation of environmental law or any action that may appear to conceal such a violation, immediately report the matter to your supervisor or to our Legal Department.

Be proactive. Look for ways to reduce waste and use energy and natural resources more efficiently.



Helpful Resources

This Code does not cover every policy or situation that you may encounter while conducting business on behalf of the Company. If you are not clear on what is expected of you, or have a question, seek guidance as instructed in this Code or by using the resources listed below.

Human Resources Department

HumanResources@cornerstone-bb.com

Legal Department and Compliance Department

Compliance@cornerstone-bb.com

Integrity Helpline



Through the internet at Cornerstonebuildingbrands.ethicspoint.com



Call using the appropriate number below:

United States or Canada:

1-844-637-6756

Costa Rica:

0-800-011-4114

0-800-225-5288

0-800-228-8288

(Spanish Operator)

After dialing one of the above numbers, dial 844-637-6756

at the English prompt.

Mexico:

001-800-658-5454

(Spanish Operator)

001-800-288-2872

001-800-112-2020

(Por Cobrar)

After dialing one of the above numbers, dial 844-637-6756

at the English prompt.

Nothing in this Code or in any of our policies is intended to limit or interfere with the right to engage in activities protected under applicable labor laws, such as discussions related to wages, hours, working conditions, health hazards and safety issues.

To the extent any term of this Code directly conflicts with a requirement of a valid CBA to which the Company is a party, the terms of the CBA will apply to the employment of the employees covered by the CBA unless the Company and the applicable union agree otherwise.

Amendments and Waivers

Our Code may occasionally be updated or amended for changes in laws, policies and practices. Any changes to the Code must be approved by the Board of Directors.

Any request for a waiver made by an officer or director of the Company must be approved by the Board of Directors. All other requests for a waiver must be approved by the Chief Executive Officer or the Board of Directors.