US LBM Holdings, LLC Supplier Code of Conduct

LEGAL DEPARTMENT Effective **February 2, 2022**

Introduction

US LBM aims to be leaders in ESG and sustainability efforts in our industry and seeks to play an active role in meeting the current and future needs of society. By joining the UN Global Compact, we are committed to ensuring reduced environmental impact, defending and promoting human rights and fighting corruption, discrimination and all forms of forced labor. It is essential that the same requirements are undertaken also by our Suppliers.

US LBM's goal is sustainable growth while reducing its environmental impact and optimizing resource management by reducing emissions, reducing consumption of energy and water and treating waste as a resource, among other measures.

All US LBM employees are required to follow US LBM's Standards of Business Conduct, and by adopting this Supplier Code of Conduct, we make sure that our Suppliers and Vendors are aware of our joint sustainable commitment and expectations. A US LBM Supplier shall always act in a way that does not negatively affect our brand or goodwill.

The Supplier shall on an ongoing basis keep itself updated on changes to our Supplier Code of Conduct. US LBM will post updates

This Supplier Code of Conduct applies to all suppliers, including sub-suppliers, providing products and/or services to US LBM.



Legal Compliance

of the Supplier Code of Conduct on its website.

Compliance with applicable laws and regulations is an obvious and absolute requirement for doing business with US LBM.



All Suppliers doing business with US LBM shall comply with laws and agreements that apply to their operations and employment in the countries where they work. Suppliers' employees must know and follow the laws that govern their individual tasks.

Human Rights

Fundamental human rights

The respect of human rights, and when possible, the promotion of such rights, shall be integrated in all business activities and operations. All employees shall be treated fairly, with dignity and respect, in accordance with fundamental human rights.

Equal Rights and Non-Discrimination

The Supplier shall not discriminate, but shall promote equal opportunity, in hiring and employment practices. The Supplier shall not accept and actively mitigate any form of harassment, violence or verbal abuse of its employees. US LBM Suppliers are expected to support diversity and equal opportunity in their workplaces.





Workplace

Freedom of Association and Collective Bargaining

The Supplier should uphold the right to Freedom of Association and Collective Bargaining, as permitted by and in accordance with applicable labor laws.

Forced Labor

The Supplier shall not use, or in any other way benefit, from forced or bonded labor. No one shall be subject to working under menace of any penalty.

Child Labor

Use or support of any child labor, or other child exploitation, is not tolerated in any form.

Wages

U.S.

Suppliers must comply with minimum wages and working hours requirements in accordance with local laws and ensure compensation of a living wage according to local living conditions.

Reporting Concerns

Suppliers must enable their employees and other stakeholders to report concerns of potentially unlawful practices in the workplace.

Health & Safety

Suppliers shall provide its employees with a safe, hygienic and healthy workplace. The Supplier shall ensure that appropriate health and safety information is provided to its employees, sub-suppliers and contractors and that relevant training and protective equipment is provided.

Environment

Suppliers must comply with all applicable environmental, health and safety regulations. They should also promote the safe and environmentally sound development, manufacturing, transport, use and disposal of its products and services.

Suppliers should use resources efficiently, apply energy-efficient and environmentally friendly technologies, reduce waste, reduce emissions to air, water and soil, reduce greenhouse gas emissions, reduce energy and water consumption, and focus on recycling.

Ethics & Compliance

Suppliers must always act with integrity and honesty and consider these to be the basis of all of its business relationships. Suppliers should maintain their own compliance program including but not limited to having their own Code of Conduct and training and monitoring programs to ensure compliance with the same.

Bribery and Corruption

All Suppliers shall act with integrity and without actions involving bribery, corruption, or money laundering. The Supplier shall ensure that its employees and third parties do not offer, promise, give or accept any advantage, directly or indirectly, nor accept improper payments to obtain new business or secure any other improper advantage.

Confidential Information

Suppliers shall respect the privacy and confidential information of all employees and business partners and protect data and intellectual property from misuse.

Trade Laws & Antitrust

Suppliers shall abide with all applicable laws and regulations pertaining to antitrust and trade controls and sanctions.

Acknowledgement & Compliance

Suppliers are required to maintain compliance with the US LBM Supplier Code of Conduct. Unless a Supplier contacts US LBM, we will assume that is has acknowledged the Code and will comply with it.

Any non-compliance must be promptly reported to US LBM. US LBM may request proof of performance regarding topics included in this Code and reserves the right to audit activities relevant to its Supplier Code of Conduct. Should the Supplier not meet the requirements of US LBM's Supplier Code of Conduct, the Supplier will have to implement a corrective action plan to improve performance.