



SUPPLIER CODE OF CONDUCT



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Introduction

ABOUT LP BUILDING SOLUTIONS

We are a leading provider of high-performance building solutions that meet the demands of builders, remodelers, and homeowners worldwide. Serving the new home construction, repair and remodeling, and outdoor structures markets, we have leveraged our expertise to become an industry leader known for innovation, quality, reliability, and sustainability. Our customers include retailers, wholesalers, and home building and industrial businesses in North America and South America, with limited sales in Asia, Australia, and Europe.

Since our founding in 1972, LP has been Building a Better World™ by helping customers construct beautiful and durable homes. We are headquartered in Nashville, Tennessee and operated more than 20 plants across the U.S., Canada, Chile, and Brazil.

LP strives to achieve the highest level of safety, integrity, and fairness by conducting our business according to the highest ethical standards. The LP Supplier Code of Conduct embodies these core values and reflects LP's commitment to operate with the highest level of integrity. As part of this commitment, LP requires our Suppliers to share in these same core values.

This Supplier Code of Conduct governs any company or entity that sells or seeks to sell any products or services to LP and/or any of its affiliates, whether directly or indirectly, through its employees, affiliates, distributors, subcontractors, agents, or other representatives (defined hereafter as "Suppliers"). LP expects its Suppliers to operate using the highest ethical and legal principles. Suppliers are responsible for ensuring that any employees, affiliates, distributors, subcontractors, agents, or other representatives of Suppliers providing products or services to LP or to LP's customers on behalf of LP read and comply with this LP Supplier Code of Conduct.

As LP is a global company and conducts business in many countries throughout the world, Suppliers must comply with the applicable laws, rules, and regulations in all countries where LP and its affiliates conduct business. Specifically, we expect all Suppliers to adhere to the following and to require their Suppliers to do the same.

1 Labor

Suppliers are expected to treat their employees fairly, in accordance with laws and industry standards, and to apply sound employment practices in all facets of the employment relationship, including those that pertain to wages, working hours, overtime, benefits, and employee rights. LP expects Suppliers to ensure that no abusive and exploitive conditions or unsafe working conditions exist at the Supplier facilities. This includes the following aspects:

FAIR WORKING CONDITIONS

Suppliers are expected to provide safe working conditions and to proactively manage health and safety risks so that occupational injuries and illnesses are prevented. Suppliers should implement management systems and controls to identify and remediate potential safety hazards, and they must provide access to emergency response facilities, essential fire safety equipment, emergency aid kits, potable drinking water, and adequate restrooms.

EMERGENCY PREPAREDNESS

Suppliers shall provide employees with appropriate training and hold regular drills, as necessary, to ensure employee preparedness in the case of an emergency.

EQUAL OPPORTUNITY AND DIVERSITY

Suppliers are expected to provide a diverse workplace, free from discrimination, harassment, or any other form of abuse. As a Supplier, (a) your hiring decisions must be based on qualifications, skills, performance, and experience, (b) your work environment needs to foster encouragement and respect among employees and business partners regardless of culture or background, and (c) all forms of harassment, including unwelcome verbal, visual, physical, or other conduct that creates an intimidating, threatening, offensive, or hostile work environment, cannot be tolerated.

FORCED LABOR

Suppliers will not utilize or source products or services from entities associated with forced, bonded, indentured, involuntary, or exploitative prison, trafficked, or slave labor. Involuntary labor includes transporting, harboring, recruiting, transferring, receiving, or employing persons by means of threat, force, coercion, abduction, or fraud for labor or services. All work must be voluntary, and workers shall be free to terminate their employment at any time. There shall be no unreasonable restrictions on entering, exiting, or moving within company-provided facilities. Suppliers will take reasonable efforts to ensure that their own Suppliers comply with this requirement.

FREEDOM OF ASSOCIATION

Suppliers must respect the right of employees to freely organize and bargain collectively.

2 Safety, Environment & Quality

Suppliers are expected to provide a safe environment and operate in an environmentally responsible manner. Suppliers will integrate quality into their business processes. This includes the following aspects:

SAFETY

LP is committed to keeping safety in mind in everything we do and will do business only with Suppliers that demonstrate a commitment to safety. We expect Suppliers to do the following:

- Make continuous efforts to achieve and sustain a workplace that is free from work-related injury and illness.
- Conduct themselves in a manner consistent with all applicable safety standards, including governmental requirements, operations, and facility-specific safety requirements, and contractual requirements.
- Identify and respond to any public health impacts of their operations or the use of their products and services.
- Treat injured employees with respect and provide medical treatment for workplace injury and illness.
- Maintain a workplace free of the effects of alcohol and drug use.

QUALITY

Suppliers are committed to achieving quality through our inspection, testing, grading, and customer performance standards and to preparing and maintaining accurate product quality records. Suppliers are expected to notify LP of issues that negatively impact the quality of the product or service being delivered, or that might harm public perceptions of LP.

SUSTAINABILITY AND ENVIRONMENT

Suppliers are expected to (a) comply with all applicable environmental laws and regulations, (b) conduct their business with concern for the environment, (c) identify opportunities for conservation of natural resources, and (d) reduce pollution and landfill waste. LP considers environmental responsibility an integral component of delivering structural solutions.

LP chooses to do business with Suppliers that share a commitment to preserving our environment and implementing sustainable business practices and that go beyond legal compliance and enhance the communities in which they operate.

LP FACILITIES

While working at an LP facility, Suppliers are expected to (a) be solely responsible for the quality, performance, behavior, supervision, and protection of their personnel, (b) not engage in any work for or on behalf of LP while impaired by alcohol or other substances, (c) not possess illegal drugs or controlled substances (except for legally obtained medications used as directed by a licensed medical practitioner), and (d) be aware of and comply with LP's safety rules (including use of personal protective equipment) and emergency plans and response procedures. Subject to local laws, Suppliers will prohibit their workers from bringing weapons, firearms, and hazardous materials to an LP facility.

3 Ethics

Suppliers are expected to conduct their business in an ethical manner. This includes the following aspects:

FAIR DEALINGS AND COMPETITION LAWS

Suppliers are expected to deal fairly with LP employees as well as their other business partners and should not take unfair advantage through manipulation, concealment, abuse, misrepresentation of material facts, or any other unfair dealing. Suppliers will not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of applicable antitrust and competition laws.

ILLEGAL PAYMENTS

LP expects its Suppliers to do business in an ethical and transparent manner. Suppliers must not offer bribes, kickbacks, or improper payments of any kind to government officials or other third parties for the purpose of obtaining or retaining business or gaining an improper advantage. Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act (FCPA) as well as the local anti-bribery laws in each jurisdiction in which they do business.

INTELLECTUAL PROPERTY RIGHTS

Suppliers must respect and refrain from infringing upon the intellectual property rights of others, including patents, trademarks, copyrights, and other proprietary rights.

CONFLICT OF INTEREST

It is essential for Suppliers to avoid any improper influence or even the appearance of improper influence in the way it conducts its business. This includes avoiding relationships, personal or professional, which could compromise or reasonably appear to compromise the business partner and the business partner's employees' responsibilities and ability to make sound, impartial, and objective business decisions in connection with the business partner's relationship with LP. This includes any situations in which Suppliers are dealing with LP employees.

GIFTS AND ENTERTAINMENT

Whenever a gift or entertainment is offered in the context of a business relationship, there is a risk that it may influence or appear to influence a business decision. To build and maintain the trust of our stakeholders, LP prohibits its employees from accepting gifts or entertainment exceeding USD \$75 in value, including loans and guarantees, from any of the company's Suppliers. This applies both to employees and to immediate family members.

ETHICAL CULTURE

Employees of Suppliers are encouraged to work through their own company to resolve internal ethics issues. However, Suppliers should promptly report violations of this Code or any unethical behavior by an LP employee to an LP manager or, if this is not feasible, to the LP Confidential line at 800-496-4892 or LPConfidential.lpcorp.com, available 24 hours a day, 365 days a year. Except as required by law, persons reporting concerns may request that they remain anonymous. The LP Confidential line makes every attempt to protect the confidentiality of information provided to it—unless maintaining confidentiality would create a significant health, safety, or legal risk.

4 Management Systems

Suppliers are expected to implement management systems that facilitate compliance with this Supplier Code of Conduct. This includes the following aspects:

COMPLIANCE WITH THE LAW

LP is committed to obeying the law wherever it conducts business. We expect our Suppliers to comply with all applicable laws, including laws relating to employment, human rights, the environment, and health and safety. LP reserves the right to decline deals with Suppliers that do not comply with the law.

COMPLIANCE WITH THIS CODE

This Code supplements but does not supersede any contracts between LP and the applicable Supplier. This Code of Conduct is not all inclusive. At a minimum, however, we require that all Suppliers meet the standards expressed herein. LP reserves the right to take responsive action following violation of this Code, including but not limited to termination of the business relationship (including any purchase orders and contracts). LP reserves the right to hold Suppliers responsible for reasonable costs of investigating non-compliance and appropriate remediation resulting from a Supplier's non-compliance.

CONFIDENTIALITY

Suppliers must protect the confidential information entrusted to them by LP, its affiliates, customers, or other Suppliers. Confidential information may only be used and disclosed in a manner authorized by LP. Confidential information includes any business information of LP, its customers, or Suppliers that is not generally known to the public. In most cases, the terms of any agreement you may have with LP are also confidential.

INFORMATION SECURITY

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification, and disclosure through appropriate cyber security procedures. Suppliers must comply with all applicable data privacy laws. Suppliers shall ensure extension of this requirement to all sub-tier sources they employ.

ACCURATE FINANCIAL RECORDS

Suppliers are expected to keep accurate records of all matters related to the Supplier's business with LP. This includes the proper recording of all expenses and payments. If LP is being charged for a Supplier's employee's time, the time records must be complete and accurate.

MONITORING COMPLIANCE

Suppliers must establish and maintain a process of ensuring compliance with the LP Supplier Code of Conduct. This includes communicating the requirements of this Code to all employees, affiliates, agents, and subcontractors of the Suppliers in their local language. Suppliers must maintain all documentation necessary to demonstrate their compliance with the LP Supplier Code of Conduct.

QUESTIONS

Other than related to reporting as outlined above, questions regarding this Code of Conduct can be directed to supplier.compliance@lpcorp.com.

