CORNERSTONE BUILDING BRANDS CORPORATE POLICY

DATE LAST REVISION DATE 06/16/2022	_	P-HR-100
POLICY EFFECTIVE DATE 06/16/2022 LAST REVISION 06/16/2022	POLICY OWNER	Chief Human Resources Officer
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HUMAN AND LABOR RIGHTS POLICY

SCOPE

This Policy applies to all employees, contractors, visitors and suppliers of Cornerstone Building Brands, Inc. and its subsidiaries (the "Company"). We are committed to respecting the human rights and dignity of everyone. We seek to apply both the letter and spirit of all applicable national, state and local laws across our operations. We hold our business partners, suppliers, contractors, and vendors (hereinafter collectively referred to as suppliers) to these same standards. The following standards are meant to ensure that these principles are maintained.

POLICY

Compliance with Laws

The Company and its suppliers shall comply fully with all applicable national, state and local laws and regulations, including, but not limited to, those related to labor, immigration, health and safety, and the environment

Voluntary Labor

All labor shall be voluntary. Child labor or forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise, shall not be used. The Company and its suppliers shall comply with national, state and local minimum working age laws and requirements and not employ child labor. Workers shall be allowed to maintain control over their identity documents and shall be provided with rest days as required by applicable national, state and local law. Working hours shall be consistent with national, state and local regulations and shall not exceed the maximum hours of daily labor set by applicable law.

Hiring and Employment Practices

We strive to create a work environment that is inclusive of all employees and represents the communities in which we operate and the customers we serve. The Company and its suppliers shall comply with all applicable national, state and local laws forbidding discrimination in employment on the basis of race, color, creed, religion, sex (including pregnancy or related medical conditions, gender identity, and sexual orientation), marital status, national origin, ethnicity, disability, handicap, age (age 40 or older), veteran status, military service or affiliation, genetic information or any other characteristic protected under applicable local, state or federal law

Harassment and Abuse

Every employee shall be treated with respect and dignity, and no employee shall be subject to any physical, sexual, or psychological harassment or abuse.

Compensation

To attract and retain the best employees, we focus on providing competitive pay and benefits. Our compensation programs target the market for competitiveness and sustainability. Employees shall be paid at least the minimum wage required by national, state and local law, including overtime compensation at the rate required in their country, and shall be provided legally mandated benefits.

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Freedom of Association

We respect the ability of employees to choose whether or not to join unions and engage in collective bargaining, as permitted by applicable laws in the countries where Company does business.

Health and Safety

The Company and its suppliers shall comply with national, state and local health and safety laws in order to provide a safe and healthy workplace for employees, contractors and visitors. We endeavor to finish each and every day injury and incident-free.

Environmental

The Company and its suppliers shall comply with all applicable national, state and local environmental laws and regulations, including, but not limited to, laws related to air emissions, water discharges, toxic substances exposure, and hazardous waste disposal.

Responsibility

We encourage employees and others to report concerns regarding any action or condition that may be unsafe, inconsistent with our policies or in violation of applicable laws. Any violation of this policy should be reported to Human Resources, management or the Company Integrity Helpline immediately. The Company's Integrity Helpline contact information is:

Company's Integrity Helpline at: Cornerstonebuildingbrands.ethicspoint.com

United States and Canada Company's Integrity Helpline at: 1-844-637-6756

> 001-800-658-5454 Mexico

0-800-011-4114 Costa Rica

All complaints will be promptly reviewed and handled as confidentially as possible.

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REVIEW/REVISION BLOCK

Rev#	Review/ Revision Date	Reason for Review or Revision
001	06/16/2022	New policy

APPROVALS

Approval Date	Approval Level
06/16/2022	CEO Approval Level