



California Transparency in Supply Chain Act Disclosure

(December 31, 2022)

The California Transparency in Supply Chains Act of 2010 requires manufacturers and retailers to provide information regarding their efforts to address the issue of slavery and human trafficking, allowing consumers to make better, more informed choices regarding the products they buy and the companies they choose to support.

Cornerstone Building Brands (CBB) is committed to business integrity, responsible product sourcing, the safety and wellbeing of workers across the global supply chain and to driving compliance with the letter and the spirit of the laws and regulations that apply to our business, including laws that prohibit slavery and human trafficking. We hold our business partners, suppliers, contractors and vendors (collectively Suppliers) to these same standards.

Supplier Standards

CBB's standard terms and conditions and contract templates require Suppliers to comply with CBB's Supplier Code of Conduct (Supplier Code) which prohibits the use of forced labor. The Supplier Code states that Suppliers

shall not support or engage in slavery, human trafficking or any form of forced labor in any part of [their] supply chain. . . . All labor must be voluntary and workers must provide free, prior and informed consent.

CBB's Supplier Code of Conduct also establishes strict limits on the use of younger workers; child labor is often associated with slavery and human trafficking.

Suppliers must not employ workers younger than the greater of 15 years of age or 14 where allowed by local law and consistent with standards established by the international labor organization core conventions, the age for completing compulsory education, or the minimum age established by applicable local law.

The company has the right to terminate its relationship with any Supplier found to engage in human trafficking or other violation of the Supplier Code. CBB maintains internal and external reporting lines, including the CBB Integrity Hotline, where misconduct reports may be made; reports to the Integrity hotline may be made anonymously where allowed by local law.

Supplier Auditing and Verification

CBB has the right to conduct on site Supplier audits, including unannounced audits, using its own personnel or qualified third parties as appropriate and necessary. CBB does not currently engage in any verification of our product supply chains to evaluate and address risks of human trafficking.



Supplier Certifications

CBB requires its Suppliers to certify that they are in compliance with the Supplier Code of Conduct, including but not limited to the Code's human and labor rights requirements, and to comply with applicable laws regarding slavery and human trafficking of the country or countries in which they are doing business, as required by the California Transparency in Supply Chains Act.

CBB's Internal Accountability Standards

CBB's [Human and Labor Rights Policy](#) underscores the Company's commitment to respecting the human rights and dignity of everyone. The policy expressly prohibits the use of child labor or forced labor, whether in the form of prison labor, indentured labor, bonded labor or others.

Training

Employees engaged in Supply Chain operations are trained on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.