

# AT HOME WITH OUR VALUES

## CODE OF BUSINESS CONDUCT AND ETHICS



# WELCOME TO OUR CODE

Imagine for a moment the countless homes and buildings around the world that hold JELD-WEN products. Each window and door represents a promise kept – our promise to protect and enrich the lives behind them. JELD-WEN associates have been keeping that promise for more than 60 years, delivering reliability, strength and beauty with every product, and doing so with integrity.

We may work in different countries and serve diverse communities, but at JELD-WEN, we are one global team, united in our passion and our common purpose. We owe it to our customers and to the generations of associates who came before us to do our best work each day. Our Code of Business Conduct and Ethics shows you how. It's your tool for making good decisions and bringing our policies and our Values to life in your daily work.

You are a valued member of the JELD-WEN team and an ambassador of our brand. It's up to you to follow the Code carefully and speak up about anything that might break it. Think of the Code as your personal "how-to" guide to working at JELD-WEN – how to uphold the law, how to interact with others, and how to keep us on the right path together as a team and as a company.

Carry our Code and our Values in your heart **BOENJOE** and make them a part of who you are. When you're **At Home With Our Values**, you'll help JELD-WEN build a culture and a company that lasts.

 **JW** I S T U F O T F O  
Chief Executive Officer



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## LIVING OUR VALUES

WE'VE BUILT A CULTURE THAT UNITES US AS A GLOBAL TEAM AND SETS US APART IN OUR INDUSTRY, EMPOWERING US TO INSPIRE CONFIDENCE AND TRUST. EACH OF US MUST BE A LIVING EXAMPLE OF OUR CULTURE AND OUR VALUES – INTERNALIZING THEM, MODELING THEM AND REFLECTING THEM COMPLETELY IN EVERY ACTION.



### PURPOSE

We bring beauty and security to the spaces that touch our lives.



### VISION

To lead the global building products industry with great people creating superior products and delivering excellence in all we do.



### VALUES

#### AS ONE GLOBAL TEAM, WE ...

- Build Businesses Ethically and Safely.
- Invest in People.
- Inspire Customers Through Innovations.
- Deliver on Our Promises.
- Improve Every Day.



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# KEEPING OUR PROMISES

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IT'S ONE THING TO HAVE A SET OF VALUES. IT'S QUITE ANOTHER TO TURN THEM INTO ACTIONS. JELD-WEN'S CODE OF BUSINESS CONDUCT AND ETHICS HELPS US MAKE THAT CONNECTION, BRINGING OUR VALUES TO LIFE IN ALL THAT WE DO.

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## FOLLOW THE CODE

At JELD-WEN, we know our customers will live with our products for years to come. We care about how they're made, the impression they'll make, the job they'll do. That's why, since our founding, JELD-WEN associates have put the very best into every product – the best ideas, materials and craftsmanship and, above all, the best of ourselves.

Our commitment to quality, innovation and integrity is the secret to our success. It's what inspires confidence in the JELD-WEN name and earns us the trust and loyalty of customers around the world. When you're a part of the JELD-WEN team, you become a steward of our brand and our reputation. The things you do each day – the way you work, the choices you make, the interactions you have – matter to our customers and our company. Our Code of Business Conduct and Ethics ("Code") helps you do what's right.

### WHAT'S IN THE CODE?

- Descriptions of important ethical topics
- Advice on handling ethical situations
- Answers to frequently asked questions
- Links to JELD-WEN policies and resources
- Tools for good decision-making
- Definitions of key terms

Can't find what you need? Use the resources listed throughout the Code for more information.

### HOW TO USE THE CODE

Running a business can be complicated. Because we are a global business, a variety of laws and rules apply to JELD-WEN around the world. We don't expect you to know the details of every law. That's why we have the Code. It highlights rules that apply to us and helps you follow them. The Code provides some of the ethical situations you could face at work and equips you to make choices that reflect our Values and align with our policies.

Read the Code and refer to it often – whenever you have questions and need help.



## FOLLOW THE CODE



### WHO THIS CODE IS FOR

If you work for JELD-WEN, the Code applies to you. We expect every associate in every JELD-WEN location around the world to follow the Code, regardless of where you work or what job or role you hold. It's up to you to affirm that you've received and read the Code, and that you're committed to following it every day.

We also expect anyone who works on JELD-WEN's behalf to be **At Home With Our Values**. That means our business partners, consultants, contractors, contingent workers, suppliers, vendors and any other third parties must share our commitment to the highest standards and uphold our [Supplier Code of Business Conduct](#).

### WHEN VIOLATIONS HAPPEN

Our Code spells out our shared commitment to integrity and how to keep that commitment. We view our Code as non-negotiable. We take the Code seriously, just as we take any behavior that violates it. If a violation of our Code or policies happens, it can lead to serious consequences, including disciplinary action, up to and including dismissal. Violations of law can be more serious, potentially leading to civil or criminal penalties.

## KNOW YOUR RESPONSIBILITIES

We know there's nothing more valuable than our company's good name, so we recognize the responsibilities we share to protect and enhance our reputation.

If you're an associate, it's your responsibility to:

**LIVE OUR VALUES** – Let them inspire you and influence every action you take.

**FOLLOW THE RULES** – Know our Code, our policies and the laws that impact your work. Follow them carefully and [ask questions](#) if the right choice is unclear.

**SPEAK UP** – If you're aware of anything that might violate our Code, policies or the law, don't keep it to yourself. [Speak up](#) immediately. You don't need to have to confirm misconduct or even have all of the details of a situation to take action.

**DO YOUR PART** – Cooperate fully and honestly if you're asked to help with an investigation or audit.

If you're a manager, you have extra responsibilities:

**BE A GOOD EXAMPLE** – In all that you do, demonstrate what it means to be **At Home With Our Values**. Hold yourself to the highest standards and always follow our Code and policies.

**BE CODE-SMART** – Know the Code well so you can answer questions and guide your team to the right resources when they need help.

**KEEP COMMUNICATIONS OPEN** – When associates have concerns, they need to know they can come to you. Help them feel confident and secure in speaking up.

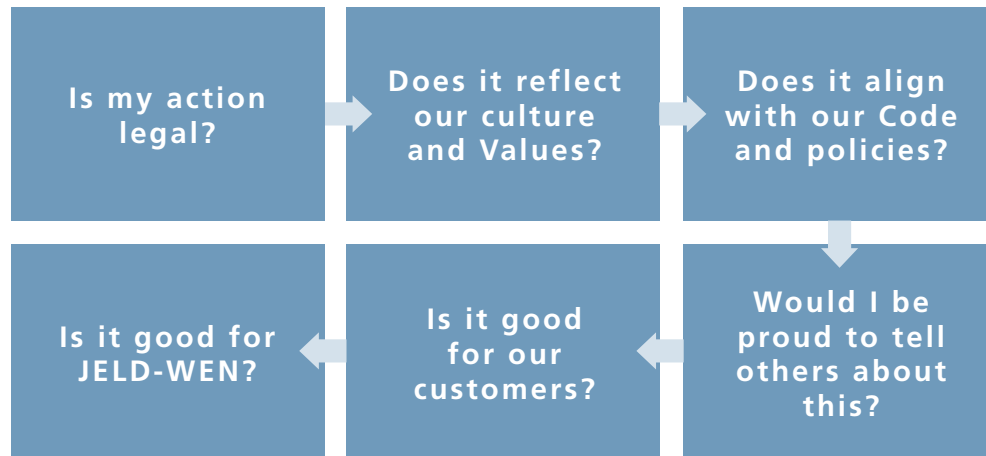
**TAKE ACTION** – If you're made aware of possible misconduct, don't ignore it and don't investigate it yourself. [Speak up](#) to proper internal resources.





## MAKE GOOD DECISIONS

When we live our Values, we shape our decisions for the better. Those decisions, in turn, shape JELD-WEN and the lives of everyone our business touches. But we know the right decisions aren't always obvious. When you're not sure, check our Code and policies and ask yourself:



Were you able to answer “**yes**” to every question? Your action is probably OK. Any “**no**” or “**maybe**” answers are a sign to stop and **ask for help**.



## SPEAK UP

While the Code shows us how to work ethically, it's not enough to simply know right from wrong. Only by speaking up about our concerns can we uncover violations and do something about them. That is when you're truly **At Home With Our Values** – when you decide to speak up for your company and for what's right. We know speaking up can be difficult, but it's one of your most important responsibilities as a member of the JELD-WEN team.

### WHERE DO I START?

It's important to JELD-WEN that you feel empowered to speak up. You should never feel intimidated or willing to ignore something that concerns you. We make the process as easy and comfortable as possible by offering multiple confidential ways to speak up. Contact:

- Your direct supervisor
- Your Human Resources partner
- The [Legal Department](#)
- A member of senior leadership
- The Board of Directors

Or, if you prefer, you also may anonymously contact:

The JELD-WEN Ethics Helpline

By phone at **1-855-244-4794**

Or online at [jeld-wen.ethicspoint.com](http://jeld-wen.ethicspoint.com).

This service is available in multiple languages, 24 hours a day, seven days a week and is operated by an independent third-party provider. The [Ethics Helpline website](#) lists local phone numbers for your geographic region. These same local numbers are listed on the Speak Up posters displayed in your facility. An operator or online webform will document your concern and forward it to the appropriate resource at JELD-WEN. You have the choice to report anonymously, but we do encourage you to identify yourself when reporting to assist our review of your concern. Keep in mind, laws in some countries may prohibit anonymous reporting or limit the types of issues you may report anonymously.

### THEN WHAT HAPPENS?

- No matter how you speak up, we'll take your report seriously. (You don't have to have all of the details of the situation or be completely sure if misconduct is happening.)
- If necessary, we will conduct a prompt and thorough investigation. Our intention is to keep your report as confidential as possible and protect your rights and the rights of those being investigated.
- If requested, we expect your honest and complete cooperation with any internal or external investigation.
- If we find that there has been a violation of the Code, our policies or the law, we will take appropriate actions – though in many cases, the investigation and outcome will remain confidential, and the reporter may be unaware of some actions taken.

## SPEAK UP

### NO RETALIATION

The greatest barrier to speaking up is often the fear of what might happen if you do, namely, retaliation. Giving you confidence to speak up is our top priority, so we don't tolerate retaliation of any kind against anyone who shares a concern in good faith or assists with an investigation.

Retaliation goes against everything we believe at JELD-WEN. It violates our Values, and it also violates our Code, so we don't stand for it – even if your concern turns out not to be true.

Examples of retaliation include:

- Dismissal or the threat of dismissal
- Demotion or reduced responsibility
- Reduced pay
- Denial of opportunities
- Exclusion from activities

If you suspect retaliation of any kind or you believe you have experienced it after speaking up about a possible violation of our policies or the law, [report your concerns](#) immediately.

### HAVE I REPORTED IN “GOOD FAITH”?

You have if you sincerely believe that your concern is true. In other words, you don't have to verify that it's true – you just haven't made an intentionally false or malicious report.



### PICTURE THIS

**I'M RELUCTANT TO REPORT A CONCERN BECAUSE IT INVOLVES MY DIRECT SUPERVISOR. I'M AFRAID I COULD BE FIRED IF I REPORT IT. AND BESIDES, WON'T MY COLLEAGUES REACT NEGATIVELY IF THEY KNEW I REPORTED THIS? ISN'T IT BETTER TO WAIT AND SEE IF THE SITUATION IMPROVES?**

No, the worst thing to do is ignore your concern. This may be an especially challenging situation to report, but doing so is your responsibility, no matter who is involved. We won't tolerate retaliation against you – of any kind, by anyone. In this situation, you may bring your concern to any other resource listed here, including the Ethics Helpline.

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# SHOWING RESPECT

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WE'RE BUILDING SOMETHING AMAZING TOGETHER AT JELD-WEN – A HOME WHERE EVERYONE IS WELCOME AND EVERY ACTION AND INTERACTION HIGHLIGHTS RESPECT, FOR EACH OTHER AND OUR COMPANY.

## WITH EACH OTHER

- PROMOTE DIVERSITY, EQUITY AND INCLUSION 13
- PRACTICE RESPECT 15

## IN OUR WORKPLACE

- MAINTAIN A SAFE AND HEALTHY WORKPLACE 17
- PROTECT COMPANY ASSETS 19
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## WITH EACH OTHER PROMOTE DIVERSITY, EQUITY AND INCLUSION

WE CELEBRATE AND EMPOWER OUR UNIQUE WORKFORCE – A DIVERSE TEAM OF INDIVIDUALS, EACH BRINGING NEW PERSPECTIVES AND IDEAS TO THE TABLE. IT'S BETTER FOR OUR PEOPLE AND OUR BUSINESS.



### BRING INTEGRITY HOME

#### PROMOTE FAIRNESS

- Help make sure every associate has an equal chance to contribute and succeed and has access to the same resources to reach their goals.
- If you make employment decisions for JELD-WEN, carefully follow equal employment laws to promote equity in every area of our business, especially when interviewing applicants and hiring, promoting and dismissing associates. Base employment decisions on factors like business requirements and an individual's skills and qualifications.
- If anything about the law or our policies is unclear, contact the [Legal Department](#) for guidance.

#### HELP STOP DISCRIMINATION

- Treat each individual fairly and respectfully – without discriminating or even favoring someone based on personal traits, including those protected by law, such as:
  - Race
  - Color
  - Religion
  - Sex
  - Gender expression or identity
  - National origin
  - Age
  - Disability
  - Genetics
  - Veteran status
  - Marital or family status
  - Political affiliation
- Welcome input from new sources and make sure every person is heard and appreciated for their contributions.
- Stand up against discriminatory, disrespectful or unfair treatment by [speaking up](#) about it right away, no matter where in our business it happens.



## WITH EACH OTHER PROMOTE DIVERSITY, EQUITY AND INCLUSION

### AVOIDING BIAS

We all have personal biases (some we're not even aware of) that can influence us. In your interactions:

- Work to recognize and overcome your own biases.
- Don't always rely on the same people for input. Bring others into the conversation.
- Never exclude anyone or dismiss what they have to say.
- Be a courteous listener and encourage others to do the same.



### PICTURE THIS

**I SUSPECT THAT A JOB APPLICANT WAS PASSED OVER DUE TO A PHYSICAL DISABILITY. SINCE THIS PERSON IS AN APPLICANT AND NOT AN ASSOCIATE, SHOULD I JUST LET THIS GO?**

No, you shouldn't. We need to know about possible discrimination wherever it happens in our operations, including screening candidates and hiring. Speak up about your concerns immediately to help us ensure that we're acting fairly and following the law. Contact any resource listed [here](#).



## WITH EACH OTHER PRACTICE RESPECT

OUR WORKPLACE SHOULD BE SAFE AND INVITING FOR EVERYONE – FREE FROM DISRESPECTFUL AND ABUSIVE CONDUCT.



### BRING INTEGRITY HOME

#### USE CARE IN EVERY INTERACTION

- Every day, in every conversation, highlight respect. Whether you're talking with coworkers or our customers, business partners or the public, be professional and respectful.
- Pay attention to your own behavior as well as others'. Never allow harassment, intimidation, bullying or other abuse to become a part of any interaction. Be aware, the definitions of these terms can vary from country to country. Contact the [Legal Department](#) to find out what's required in your location.



## WE PROHIBIT ...

### Harassment

Verbal or physical behavior that shows hostility to others based on their membership in a protected group or status, such as:

- Offensive jokes or insults
- Displaying offensive images or symbols
- Sexual harassment, including unwanted physical contact or sexual advances
- Requiring physical intimacy for professional gain or favorable treatment

### Discrimination

Unfair or prejudicial treatment of others based on their membership in a protected group or status, such as:

- Using a harsher standard to appraise the work of someone with protected status
- Failing to hire or terminate someone due to their membership in a protected status group

### Bullying

Aggressive, coercive or threatening behavior to dominate someone, such as:

- Insulting or belittling someone to embarrass them
- Using your position to pressure or intimidate others
- Spreading rumors to discredit someone

See related company policies in your location for reporting similar activities.

## WITH EACH OTHER PRACTICE RESPECT

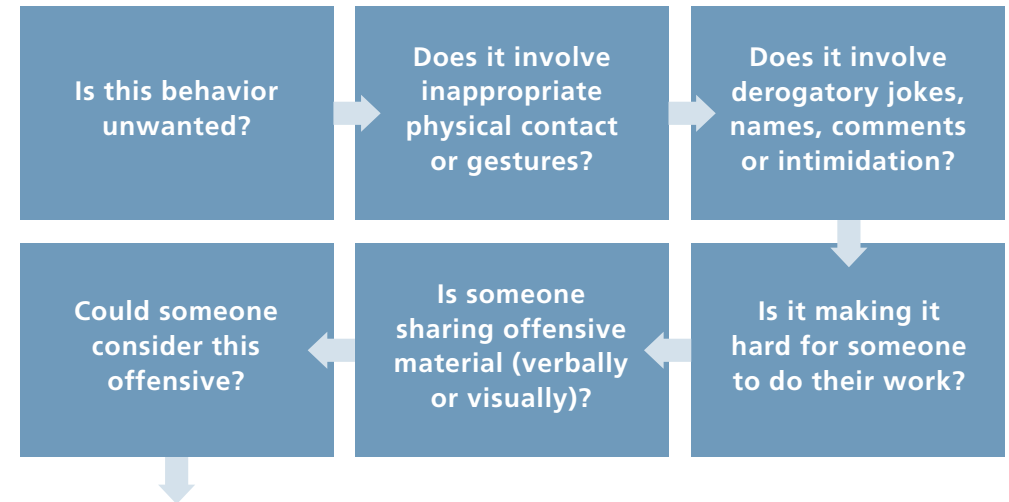
### WATCH FOR HARASSMENT

- Recognize that harassment can take many different forms. It can be physical, verbal or sexual in nature and affect someone's ability to do their job. Harassment can even be unintentional.
- Don't ignore harassment, no matter what form it takes. If you see or experience it, speak up immediately.



### HARASSMENT CHECK

Is this conduct harassment? Ask yourself:



Answering "yes" or "maybe" to any of these is a sign of possible harassment.



## IN OUR WORKPLACE MAINTAIN A SAFE AND HEALTHY WORKPLACE

FOR JELD-WEN, A SAFE WORKPLACE IS MORE THAN A REQUIREMENT – IT'S A COMMITMENT. IT MEANS PUTTING OUR ASSOCIATES' HEALTH AND WELLNESS FIRST AND ENGAGING EVERY INDIVIDUAL TO WORK SAFELY AND RESPONSIBLY.

### BRING INTEGRITY HOME

#### BE SAFETY SMART

- Make sure you know and follow all safety rules and procedures that apply to you.
- Take all required training and apply it carefully. Don't use any equipment you're not trained to use safely.
- Be a model of safety for others. Wear personal protective equipment whenever required and use equipment properly – never skip safety steps.
- Immediately report injuries and potential safety hazards, including malfunctioning equipment, to your supervisor or safety representative.

#### BE FIT FOR WORK

- Never work under the influence of alcohol or drugs, which can impair your judgment and productivity and put others at risk. There may be exceptions to this rule during company events where alcohol is served, but we will always follow the law.
- Don't operate JELD-WEN equipment or vehicles or conduct company business under the influence of alcohol or drugs (either illegal drugs or other controlled substances).

#### WHAT SHOULD I WATCH FOR?

Anything that could cause harm to others, including:

- Violations of safety rules or laws
- Verbal or physical threats
- Unsafe work conditions
- Possible weapons
- Broken equipment
- Substance abuse



## IN OUR WORKPLACE MAINTAIN A SAFE AND HEALTHY WORKPLACE

### HELP PREVENT VIOLENCE

- We don't tolerate threats or acts of violence in our workplace. Protect everyone in our facilities by watching for signs of workplace violence. Contact the [Legal Department](#) to find out what's required in your location.
- Remember, JELD-WEN does not permit weapons of any kind in our facilities. If you become aware of a weapon, [speak up](#) immediately.
- If you believe there is imminent danger to persons or property, immediately contact emergency services or the local authorities.



### PICTURE THIS

**I SUSPECT THAT A COWORKER IS ABUSING PRESCRIPTION DRUGS, APPEARING CONFUSED AND SLEEPY AT WORK. SINCE THIS ISN'T AN ILLEGAL SUBSTANCE AND THE PERSON HAS A PRESCRIPTION, SHOULD I MIND MY OWN BUSINESS, OR SHOULD I SPEAK UP?**

You should speak up. If this individual's performance has been impaired, it could cause a safety hazard for you and others in your facility. Talk to your manager or another JELD-WEN resource right away.



## IN OUR WORKPLACE PROTECT COMPANY ASSETS

OPERATING A BUSINESS TAKES HARD WORK AND A VARIETY OF VALUABLE ASSETS. JELD-WEN INVESTS A GREAT DEAL IN THESE ASSETS AND TRUSTS US TO USE THEM RESPONSIBLY AND KEEP THEM SAFE FROM LOSS, MISUSE OR THEFT.

### BRING INTEGRITY HOME

#### SECURE OUR ASSETS

- Recognize that you use JELD-WEN's assets every day, regardless of your job or where you work. Whether it's our physical, electronic or information assets, use these resources legally and properly.
- Follow our policies to prevent unauthorized access to our facilities and **information**.
- Never borrow, lend or dispose of company assets without authorization or use them for personal gain.
- Limit personal use of our assets, and don't let your use violate our policies or the law or interfere with your responsibilities for JELD-WEN.



## IN OUR WORKPLACE PROTECT COMPANY ASSETS

### ADOPT GOOD CYBERSECURITY HABITS

- Protect our electronic and information assets by following our records retention policy and staying alert for possible cyberattacks.
- Protect **personal information** by following our data privacy policies.
- When using JELD-WEN computer systems, networks or data, use care. To avoid malware and unauthorized access or disclosure, follow our policies and cybersecurity rules:
  - Create strong passwords. Keep them updated and never share them.
  - Watch for and don't click on suspicious links or downloads.
  - Only use JELD-WEN-approved hardware, software and applications.
  - Promptly apply system updates provided by JELD-WEN IT.
  - Never access our information on unsecured networks, like using public Wi-Fi.
  - Don't disclose **confidential information or intellectual property**.
  - Contact the **Legal Department** if you see or suspect data has been shared with unauthorized individuals.

### WHAT ARE SOME EXAMPLES?

#### Physical assets

Resources we can see and touch, such as:

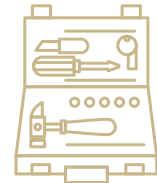
- Facilities and furniture
- Tools and equipment
- Company vehicles
- Office supplies
- Company funds



#### Electronic assets

Resources that help run our systems and networks, such as:

- Computer hardware and software
- Networks and databases
- Mobile devices
- Internet access



#### Information assets

Information we create or collect, such as:

- Proprietary information
- Intellectual property
- Personal information
- Patents, copyrights and trademarks
- Trade secrets



## IN OUR WORKPLACE AVOID CONFLICTS OF INTEREST

WE ALL HAVE INTERESTS OUTSIDE OF WORK. SOME OF THEM COULD INFLUENCE THE WAY WE DO OUR JOBS OR UNFAIRLY BENEFIT US WHILE HARMING JELD-WEN. THESE SITUATIONS ARE CONFLICTS OF INTEREST, WHICH WE WATCH FOR, AVOID AND DISCLOSE.



### BRING INTEGRITY HOME

#### SHOW YOUR COMMITMENT TO JELD-WEN

- Always do what's best for our company – never do anything that might cause someone to question your loyalty, whether it's an actual conflict of interest or the appearance of one.
- If you're facing a situation that might improperly influence your judgment at JELD-WEN, don't wait or ignore it. Disclose it immediately to your manager. When you do, we can work with you to avoid or mitigate the conflict.

#### LEARN TO RECOGNIZE CONFLICTS

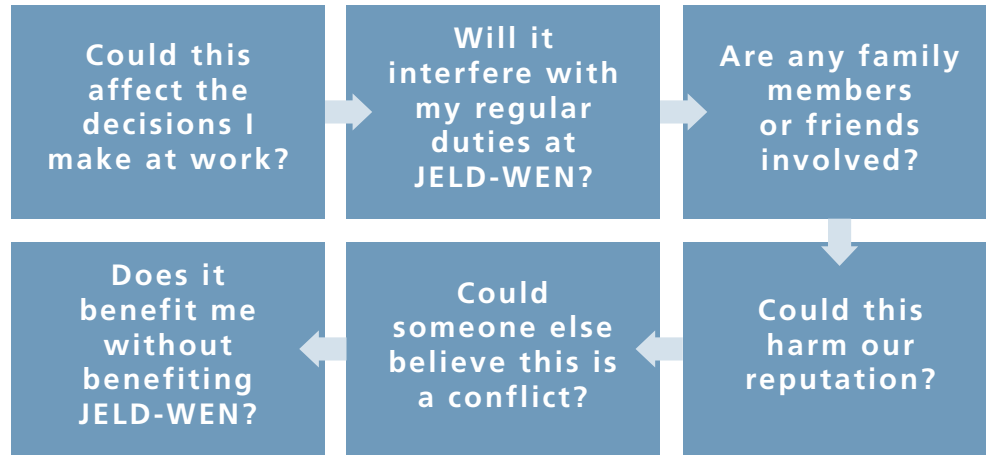
- While conflicts of interest take different forms and can be difficult to spot, they often involve situations such as:
  - Taking a second job with a competitor or customer
  - Doing service work for or accepting a board of directors' position for a competitor or a company that does business with (or hopes to do business with) JELD-WEN
  - Supervising a friend or family member or making employment decisions that favor them
  - Having a personal or romantic relationship that could conflict with your duties or with our interests
  - Making a significant investment in a vendor, customer or other business partner
  - Taking personal advantage of a business opportunity that belongs to JELD-WEN
  - Soliciting or accepting improper gifts or entertainment. See [Follow the Rules for Gifts and Entertainment](#) to learn more



## IN OUR WORKPLACE AVOID CONFLICTS OF INTEREST

### COULD I HAVE A CONFLICT?

If you suspect a situation might be a conflict of interest, ask yourself:



If you answer “**yes**” or “**maybe**” to any of these questions, you may have a conflict of interest. Talk to your manager about it right away.



### PICTURE THIS

**MY SPOUSE OWNS A BUSINESS AND WANTS TO BE A JELD-WEN VENDOR. SINCE I’M NOT INVOLVED IN SELECTING OUR VENDORS, WOULD THIS BE OK?**

It may be. While it’s good that you’re not involved in selecting vendors, you should still disclose the situation to your manager. That way, if your spouse becomes a vendor, we can make sure that you’re not given any work that involves managing, monitoring or working in any way with your spouse’s company.

## IN OUR WORKPLACE FOLLOW THE RULES FOR GIFTS AND ENTERTAINMENT

IT TAKES TIME AND TRUST TO BUILD JELD-WEN'S BUSINESS RELATIONSHIPS. WE MAKE SURE WE NEVER DAMAGE THOSE RELATIONSHIPS OR OUR REPUTATION BY LETTING INAPPROPRIATE OFFERS OR BUSINESS COURTESIES INFLUENCE THEM.



### BRING INTEGRITY HOME

#### USE CARE WITH ANY OFFER

- Whether you're interacting with customers or business partners, such as vendors or suppliers, base every interaction on honesty and integrity.
- If you work with our business partners, make sure they know and follow our [Supplier Code of Business Conduct](#).
- Never offer or accept anything with the hope of getting something in return (like a favorable business decision or some other benefit).
- Use good judgment when considering an offer. If it's not appropriate or legal, don't offer or accept it.
- Offers are generally appropriate when they are:
  - Customary, appropriate and legal
  - Nominal in value – not extravagant
  - Infrequently offered
  - Reasonable meals or entertainment, such as small business meals and snacks
- Be aware, offers may be considered "customary" or "nominal" in one country but inappropriate in others. Ask the [Legal Department](#) for guidance in your location.

#### BE EXTRA CAREFUL WITH GOVERNMENT OFFICIALS

- Be aware that the rules for gifts and entertainment are even stricter when government officials are involved. Don't offer anything of any value, no matter how small.
- If you feel you must make an offer to a government official, get approval from the [Legal Department](#) in advance. See [Do Not Tolerate Bribery](#) to learn more.

#### IS THIS OFFER ACCEPTABLE?

Make sure all offers:

- Follow the laws and customs that apply
- Align with our policies and the other party's policies
- Don't involve cash or a cash equivalent
- Don't create a sense of obligation for anyone involved
- Don't influence anyone's decisions
- Are properly approved, when required
- Are properly documented
- Are promptly declined if they violate our policies or the law

If you can't check each item, ask for help from the [Legal Department](#).



#### LOOK INSIDE

[Supplier Code of Business Conduct](#)

## IN OUR WORKPLACE PROTECT CONFIDENTIAL INFORMATION

WE EARN RESPECT BY PRACTICING IT IN EVERY ASPECT OF JELD-WEN'S BUSINESS, INCLUDING THE WAY WE HANDLE CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY. BY RESPECTING CONFIDENTIALITY, WE PREVENT DISCLOSURE AND PROMOTE CONFIDENCE AND INNOVATION.



### BRING INTEGRITY HOME

#### KNOW WHAT TO PROTECT

- As you work, recognize that you may see information about JELD-WEN, our customers or our business partners that isn't available to the public and could be harmful if exposed.
- Also recognize your duty to protect this information from disclosure or misuse – during and after your employment with JELD-WEN. This information takes many forms and includes:

#### CONFIDENTIAL INFORMATION ...

It's nonpublic information that's proprietary and critical to our business, such as:

- Acquisition or investment plans
- Research
- Projected sales or earnings
- Associate, customer or business partner lists
- Special terms or discounts offered to customers



#### INTELLECTUAL PROPERTY ...

It's what we create – the information and ideas that make us unique, such as:

- Trademarks, copyrights and patents
- Trade secrets, proprietary software or product development plans
- Marketing or strategic plans
- Branding and logos





## IN OUR WORKPLACE PROTECT CONFIDENTIAL INFORMATION

### HANDLE INFORMATION WITH CARE

- Never share confidential information or intellectual property with anyone who isn't authorized, including online, in public or on social media. Always handle information in line with our policies and with the law. If you're not sure if information is confidential, treat it as if it is.
- Also protect any sensitive personal information that you might handle. Follow data privacy laws to keep it secure. See [Protect Personal Information](#) to learn more.
- Follow the same rules with information and intellectual property belonging to other organizations, including our business partners and customers. Also follow any intellectual property laws that apply and get written permission before using someone's intellectual property.
- If you have questions about what you should protect (or how), contact the [Legal Department](#).



### PICTURE THIS

**I HAD DINNER WITH A FRIEND WHO WORKS FOR A COMPETITOR. MY FRIEND VOLUNTEERED INFORMATION ABOUT THE COMPETITOR THAT'S CONFIDENTIAL. SINCE I DIDN'T ASK FOR THIS INFORMATION, MAY I SHARE IT WITH MY TEAM?**

No, you may not. Confidential information, no matter who owns it, is meant to be kept confidential. Even though you didn't request this information, you may not use it or share it with anyone.



## IN OUR WORKPLACE COMMUNICATE RESPONSIBLY

THE THINGS WE SAY AND DO (AS A COMPANY AND AS INDIVIDUALS) CAN HAVE A LASTING IMPACT ON OUR REPUTATION. WHENEVER WE COMMUNICATE, WE OWE IT TO OUR AUDIENCE AND TO JELD-WEN TO REMAIN ETHICAL, PROFESSIONAL AND CONSISTENT IN OUR MESSAGING.



### BRING INTEGRITY HOME

#### ENSURE ETHICAL COMMUNICATION

- To make sure the things we say as a company never mislead anyone, violate a law or misrepresent us, allow only authorized JELD-WEN representatives to communicate on our behalf.
- Don't speak for JELD-WEN, or claim to, in written or spoken communications.
- If you receive a request for comment or information (from the media, the public, investors, etc.), don't respond if you're not authorized. Refer the request to the proper [internal resource](#).
- If you market or advertise JELD-WEN's products, be honest and fair. Don't disparage the competition or make unfounded claims. See [Compete Fairly](#) to learn more



#### WHY CAN'T I SPEAK FOR JELD-WEN?

If you do, you run the risk of:

- Making inaccurate statements
- Making promises we can't keep
- Violating our policies, Values, the law or industry standards
- Disclosing [confidential information](#), [intellectual property](#) or [inside information](#)
- [Anti-competitive conversations](#)

## IN OUR WORKPLACE COMMUNICATE RESPONSIBLY



### PROCEED WITH CAUTION ON SOCIAL MEDIA

- Keep in mind that social media is forever. Your posts can be shared and read by anyone in perpetuity, so take care online. Posts should be helpful, respectful and aligned with our policies.
- Never post anything harmful, harassing or discriminatory, and never share confidential or personal information.
- If you mention JELD-WEN on social media, make it clear that you work for us but don't speak for us.
- If you are authorized to speak for JELD-WEN, always be professional and helpful.



### PICTURE THIS

**I SAW A DISCUSSION ON SOCIAL MEDIA ABOUT OUR PRODUCTS, AND SOMEONE IS MAKING FALSE CLAIMS ABOUT OUR PRODUCTS. IT WOULD BE SO EASY TO CORRECT THEM. SHOULD I?**

No, you shouldn't. Your intentions may be good, and you may be able to effectively correct their statements but doing so is still risky if you are not authorized. Notify your Regional Head of Communications instead so we can address.

# ACTING RESPONSIBLY

DOING WHAT'S RIGHT IS WHO WE ARE AND WHAT WE DO AT JELD-WEN – EVERY DAY, IN EVERY INTERACTION, EVERY DECISION AND EVERY PRODUCT.

## IN OUR BUSINESS PRACTICES

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- PREVENT INSIDER TRADING 33
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## THROUGH TRUST AND TRANSPARENCY

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- PROMOTE PRODUCT QUALITY AND SAFETY 38
- BE A GOOD PARTNER 40



## IN OUR BUSINESS PRACTICES COMPETE FAIRLY

WE FIND CREATIVE WAYS TO OUTSHINE OUR COMPETITION, CHALLENGING OURSELVES TO INNOVATE AND BE OUR BEST. WE BELIEVE IN COMPETING FAIRLY, PLAYING BY THE RULES AND MAKING SURE EVERYONE HAS A CHANCE TO PARTICIPATE.



### BRING INTEGRITY HOME

#### FOLLOW THE LAW

- Be familiar with antitrust and competition laws, which promote fair competition. Know how these laws apply to our business and to you – wherever in the world you do business.
- Recognize that antitrust laws differ around the world and can sometimes be complicated. Violations of these laws can be severe, so contact the [Legal Department](#) if you ever need guidance.
- In interactions with competitors, customers or business partners, be careful not to make (or appear to make) improper agreements that benefit you, unfairly benefit JELD-WEN or keep others from competing.

#### LEARN ABOUT THE COMPETITION

- Get to know our competition, doing so legally and ethically. Only use information that is publicly available (for example, on websites and in the news).
- Never seek (or accept from anyone) information that has been obtained illegally. That includes [confidential or proprietary](#) information. (Follow the same rules when researching customers or business partners.)



#### WHEN CONVERSATIONS TAKE A TURN ...

Inappropriate conversations involve topics such as:

- Raising or holding (“fixing”) prices
- Purchase or sale arrangements
- Dividing markets or territories
- Influencing or “rigging” the outcome of a competitive bid
- Stopping others from competing
- Restricting licensing agreements or customers’ choices to use or re-sell our products
- Restricting production or sales
- Bundling of goods and services

Are you in a conversation like this? Explain that it’s inappropriate, excuse yourself, then notify the [Legal Department](#).

## IN OUR BUSINESS PRACTICES COMPETE FAIRLY

### PRACTICE ETHICAL PROMOTIONS

- Whatever we say about JELD-WEN and our products reflects on us, so when promoting our products, make sure everything we say in our marketing and advertising is reliable.
- Follow our policies and approval processes carefully and be able to back up any claims you make with solid documentation.
- Never over-promise or exaggerate anything about JELD-WEN; at all times, express yourself carefully, professionally and clearly in business communications. In the same vein, don't make false claims about our competitors or their products.



### PICTURE THIS

**WHILE ATTENDING A TRADE SHOW, A COMPETITOR APPROACHED ME AND ASKED TO MEET FOR DINNER TO DISCUSS “WHAT TO DO” ABOUT A NEW COMPETITOR IN THE MARKET. IF WE DON'T DECIDE TO DO ANYTHING THAT HURTS THE NEW COMPETITOR, WOULD IT BE OK TO GO?**

No, it wouldn't. Even though you don't intend to do something to harm the new competitor, the discussion may still occur, and the discussion itself could violate both JELD-WEN's policies and the law. Let the competitor know that meeting would be inappropriate and report the request immediately to the Legal Department.



## IN OUR BUSINESS PRACTICES DO NOT TOLERATE BRIBERY

WE'VE WORKED TOO HARD TO BUILD JELD-WEN'S REPUTATION TO SEE IT DAMAGED BY ACTS OF BRIBERY OR CORRUPTION. TO KEEP THIS ACTIVITY OUT OF OUR BUSINESS AND OUR RELATIONSHIPS, WE SUCCEED THROUGH HARD WORK – NOT THROUGH IMPROPER "PERKS."



### BRING INTEGRITY HOME

#### KNOW THE LAW

- Be aware that a variety of anti-corruption and anti-bribery laws apply to our business. Know how these apply to your work in every country where you do business.
- If you are unsure about a law, or if laws seem to conflict, ask the [Legal Department](#) for help.
- The rules regarding government officials are especially strict, so don't offer them gifts or courtesies of any value.
- Never pay a facilitation (or "grease") payment for a routine government action.

#### IS THIS OFFER OK?

If you're unsure if you may make or accept a certain offer, ask yourself:

- Am I following the laws that apply?
- How about local customs?
- Does this align with JELD-WEN's policies?
- How about the other party's policies?
- Should I get approval in advance for this? If so, did I receive it?
- Did I properly document this offer?

Make sure you can say "yes" to each question. If not, or you're not sure, first ask the Legal Department for help.

#### KNOW OUR POLICIES

- Don't rely on a bribe to win a deal, no matter what local customs are. Remember, we don't bribe, and we expect the same from our business partners.
- As a rule of thumb, avoid providing anything of value to a potential business partner or official that may appear to create an obligation or influence anyone's decisions.
- Follow our policies carefully when [gifts or entertainment](#) are involved.



## IN OUR BUSINESS PRACTICES DO NOT TOLERATE BRIBERY

### BRIBES ARE ...

Anything of value offered to influence someone's decisions, win or keep business or gain some kind of advantage

### BRIBES MAY LOOK LIKE ...

Inappropriate offers such as:

- Cash or cash equivalents
- Lavish gifts or entertainment
- Stock
- Kickbacks (payments to facilitate transactions)
- Special discounts (not available to others)
- Loans
- Charitable or political contributions
- Payment of travel expenses



### PICTURE THIS

**I WORK WITH A CONTRACTOR IN ANOTHER COUNTRY WHO MENTIONED HAVING A LONG-STANDING "SPECIAL ARRANGEMENT" WITH A SUPPLIER. IT SOUNDS LIKE BRIBERY TO ME. WHAT SHOULD I DO?**

It's important that no one representing JELD-WEN engages in bribery. If you are aware of this activity and don't take action, both you and our company could be penalized. Report your concerns immediately.





## IN OUR BUSINESS PRACTICES PREVENT INSIDER TRADING

WE BELIEVE EVERYONE SHOULD COMPETE ON A FAIR PLAYING FIELD, INCLUDING IN INVESTING. THAT MEANS EVERYONE HAVING ACCESS TO THE SAME INFORMATION AND NEVER SHARING OR BASING TRADES ON MATERIAL, NONPUBLIC INFORMATION.



### BRING INTEGRITY HOME

#### UNDERSTAND INSIDER TRADING

- Recognize that if someone uses material, nonpublic or “inside” information to trade securities or shares or “tips” that information to someone else to trade, that is insider trading.
- Be aware that being a JELD-WEN associate may give you access to inside information about our company or another company that isn’t publicly available. It’s your responsibility to keep that information confidential. A few examples include unpublished:
  - Financial results or projections
  - Mergers or acquisitions
  - Changes in leadership
  - New product announcements
  - Contract negotiations
  - Pending legal action

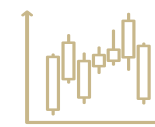
#### TRADE WITH CARE

- If you become aware of **confidential** or inside information, protect it from unauthorized disclosure.
- Never use inside information to trade securities, and never tip it to anyone else – not even your spouse, family or friends.

- Check before you trade. Make sure you’re not trading on inside information. If you’re not sure if information is “inside” information, ask the **Legal Department** before trading.
- Follow all restrictions on trading JELD-WEN stock. That includes trading windows or special blackout periods that we may impose, especially on our leaders. Wait to trade until all restrictions are lifted.

#### IS THIS INFORMATION “MATERIAL”?

It is if it might affect stock prices or influence an investor’s decision to buy, sell or hold securities.



#### IS IT “NONPUBLIC”?

It is if it hasn’t yet been released to the public (for example through a press release or other company communication).



## IN OUR BUSINESS PRACTICES FOLLOW TRADE COMPLIANCE LAWS

WE'RE PROUD TO SAY THAT JELD-WEN'S PRODUCTS ARE IN HOMES AROUND THE WORLD. BUT DOING BUSINESS INTERNATIONALLY CAN INTRODUCE GRAY ETHICAL AREAS AND CONFLICTING RULES. THAT'S WHY WE'RE CAREFUL TO FOLLOW ALL LAWS THAT APPLY TO US.

### BRING INTEGRITY HOME

#### KNOW AND DO WHAT'S REQUIRED

- Be aware that import and export laws apply to JELD-WEN wherever in the world we do business. These laws relate to trade controls, boycotts, sanctions, technologies and other issues affecting our international transactions and supply chain.
- Get to know the laws and how they apply to you, especially when the laws of more than one country apply. If rules seem to conflict or if you're not sure how to comply, [ask for help](#).
- Get all necessary clearances, licenses and government approvals before exporting our products. Because the rules often change, stay up to date on all requirements.
- Be careful when classifying imports and exports. Focus on accuracy: describing, classifying, documenting and labeling everything in advance. Always include the country of origin, the destination, the end use and the end user.

#### IS THIS TRANSACTION OK?

It is if you can say:

- It's accurate and complete.
- It doesn't involve sanctioned countries or entities.
- There are no payments of **facilitation fees**.

AND you can show:

- Proper classification and clearances
- The proper declared value
- Who is involved at both ends
- The final destination and use



## IN OUR BUSINESS PRACTICES FOLLOW TRADE COMPLIANCE LAWS



### WORK WITH ETHICAL PARTNERS

- If your work involves choosing international business partners, do your homework. Make sure each partner operates ethically and shares our Values by following our third-party due diligence process.
- As you work with business partners, stay alert for possible violations of trade law. If you see or suspect a violation, **speak up** right away.
- Keep us from participating in a boycott of any country or doing business with restricted or sanctioned entities, individuals or countries. Ask the **Legal Department** if anything is unclear.



### PICTURE THIS

#### A TRANSACTION I'M WORKING ON INVOLVES MULTIPLE COUNTRIES AND MAY INCLUDE SANCTIONED ENTITIES. HOW DO I IDENTIFY SANCTIONED PARTIES?

A transaction like this can get complicated, so work with your Regional Procurement team and the Legal Department to perform the necessary due diligence on all parties involved in your transaction.

## THROUGH TRUST AND TRANSPARENCY KEEP ACCURATE RECORDS

OUR INTEGRITY SHINES THROUGH IN EVERYTHING WE DO, INCLUDING IN THE WAY WE HANDLE OUR RECORDS. WE RELY ON OUR RECORDS TO MAKE GOOD DECISIONS AND KEEP OUR PROMISES, AND IT'S UP TO EACH OF US TO MAKE SURE THEY ARE ACCURATE.



### BRING INTEGRITY HOME

#### BE ACCURATE AND TRANSPARENT

- To help us paint a clear and honest picture of our company for our customers, shareholders and others, focus on being accurate and complete in every JELD-WEN record you touch.
- Whether it's our operational or financial records, never make a false or misleading entry and never pressure anyone (or let yourself be pressured) to falsify a record. It harms our reputation and can lead to civil or criminal penalties for those involved.
- Carefully follow our policies, the law and generally accepted accounting principles to ensure accuracy and transparency in every record and disclosure. Also cooperate fully with any audits or investigations.
- Don't ignore suspicious activity involving our records. **Speak up** immediately to prevent fraud and damage to our good name.

#### PRACTICE GOOD RECORDS MANAGEMENT

- Help us ensure JELD-WEN's records are reliable and retrievable by following our records management policies and guidelines for proper handling, retention and disposal of records.
- Never alter, destroy or conceal a record, especially if it has been requested for use in a lawsuit or investigation. Keep records well organized and secure, and maintain any required supporting documentation, such as receipts or emails.
- If you receive notice of a legal hold on any record, follow instructions and contact the **Legal Department** if you have questions.



### PICTURE THIS

**WE ARE OVER BUDGET ON A SMALL PROJECT. THE PROJECT MANAGER, WHO IS SENIOR TO ME IN THE COMPANY, HAS ASKED ME TO EXPENSE SOME MATERIALS FOR THAT PROJECT TO A DIFFERENT PROJECT. IS THAT OK?**

No, it isn't. Doing what the project manager asks is falsifying our records. Explain to this individual that you can't comply – and why. Then let your manager know about this so we can take appropriate action.

#### WHAT ARE OUR RECORDS?

Some examples include:

- Expense reports
- Accounting records
- Invoices
- Timesheets
- Performance reviews
- Contracts
- Bids and proposals
- Emails and other correspondence

## THROUGH TRUST AND TRANSPARENCY PROTECT PERSONAL INFORMATION

PEOPLE RELY ON JELD-WEN TO FEEL SAFE AND SECURE AT HOME. BUT JUST AS THEY TRUST OUR PRODUCTS, THEY SHOULD ALSO TRUST THE WAY WE HANDLE THEIR PERSONAL DATA. WE RESPECT ALL PERSONAL INFORMATION SHARED WITH US AND CAREFULLY FOLLOW THE LAW TO PROTECT IT.



### BRING INTEGRITY HOME

#### KNOW AND FOLLOW THE LAW

- Be aware that JELD-WEN handles personal information from customers, business partners, associates and anyone with whom we do business. Also be aware that it's your responsibility to protect this information from misuse, loss or unauthorized disclosure.
- Respect each person's right to control how their data is collected, stored and used. Become familiar with the data privacy laws that exist around the world to protect personal data. Follow these laws and our policies carefully and [ask questions](#) if anything is unclear.

#### PROTECT PERSONAL DATA LIKE IT'S YOUR OWN

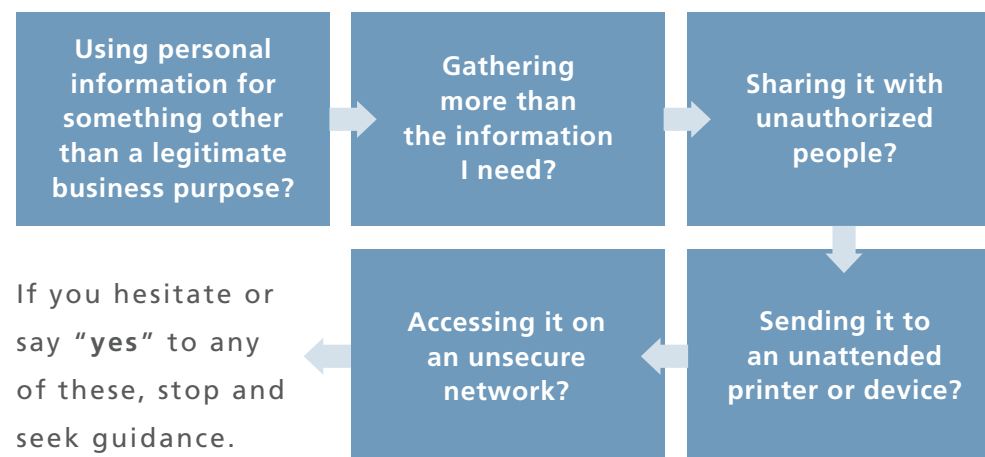
- Learn to recognize the kind of information that's personal. It's information that could be used to identify someone, including:
  - Name, address, phone number or email
  - Birth date
  - Social security or national ID number
  - Driver's license number
  - Banking or credit card information
  - Health information
  - Location data

- Whether you're collecting, accessing, storing or disposing of personal data, handle it respectfully and securely – always in line with our policies, including our [cybersecurity policies](#).
- If you become aware of a possible or actual breach of personal information, immediately contact the [Legal Department](#) for next steps.

#### AM I DOING MY PART?

Make sure you can say "no" to each of these questions:

Am I ...



If you hesitate or say "yes" to any of these, stop and seek guidance.

## THROUGH TRUST AND TRANSPARENCY PROMOTE PRODUCT QUALITY AND SAFETY

THROUGH OUR WORK, WE BECOME A PART OF OUR CUSTOMERS' LIVES, HOMES AND WORKPLACES. IT'S AN HONOR AND A RESPONSIBILITY THAT WE TAKE SERIOUSLY: TO GIVE OUR CUSTOMERS OUR BEST – THE SAFEST AND MOST BEAUTIFUL AND RELIABLE PRODUCTS EVERY DAY.



### BRING INTEGRITY HOME

#### MAINTAIN OUR HIGH STANDARDS

- Follow our manufacturing processes and the JELD-WEN Excellence model, along with all applicable quality and safety requirements and industry standards to make sure that we're always improving.
- Take all required training and don't take shortcuts when developing or manufacturing our products.
- Understand that because we do business in different countries, laws and government requirements may vary. Know what's required and focus on exceeding quality and safety standards. [Ask questions](#) if you're unsure or if laws seem to conflict.
- Make quality and safety your top priority. Never let them take a back seat to other priorities or to meet a deadline.
- Complete all required product testing to make sure nothing less than our best reaches our customers.

#### GETTING THE BEST FROM SUPPLIERS

If you work with our suppliers, you can help ensure quality and safety in every aspect of our business:

- Communicate with suppliers about our expectations of quality and safety.
- Monitor suppliers' performance, along with our distribution system.
- Watch for quality and safety issues and speak up immediately if you see them.
- Collaborate with third parties to respond to any issues.



## THROUGH TRUST AND TRANSPARENCY PROMOTE PRODUCT QUALITY AND SAFETY



### EXPECT THE SAME FROM OUR PARTNERS

- Hold our vendors, suppliers and other business partners to the same high standards to ensure a consistent commitment to quality and safety.
- Don't stand for anyone cutting corners or doing anything to compromise our products' quality or safety. If you see or suspect potential safety hazards or policy violations involving our products, **speak up** immediately.



### PICTURE THIS

**I LEARNED OF A SLIGHT QUALITY ISSUE FROM A CUSTOMER. SINCE IT'S THE FIRST TIME I'VE HEARD ABOUT IT, SHOULD I JUST WAIT AND SEE IF IT HAPPENS AGAIN?**

No. Don't wait. If there is a problem with quality or safety regarding our products, we need to know about it so we can address it. Speak up about your concerns immediately, even if the problem seems minor.

## THROUGH TRUST AND TRANSPARENCY BE A GOOD PARTNER

OUR BUSINESS IS ONLY AS STRONG AS THE RELATIONSHIPS SUPPORTING IT. THAT'S WHY WE TAKE THE TIME AND EFFORT TO BUILD PARTNERSHIPS BASED ON MUTUAL TRUST, RESPECT AND A SHARED COMMITMENT TO EXCELLENCE AND INTEGRITY.



### BRING INTEGRITY HOME

#### BE A MODEL AND MONITOR OF INTEGRITY

- Communicate JELD-WEN's policies, including our [Supplier Code of Business Conduct](#).
- Model our Code and our Values in every interaction with business partners, including suppliers, vendors and contractors. Make it clear that you expect the same high standards from them.
- Be fair and honest in all dealings with business partners – never be manipulative, dishonest or discriminatory.
- Protect any [personal](#) or [confidential information or intellectual property](#) belonging to business partners. Expect them to treat our information with the same degree of care.
- Don't tolerate (or engage in) acts that bend the rules or break the law. Never try to influence a business partner (or allow them to influence you) with an inappropriate offer. See [Do Not Tolerate Bribery](#) to learn more.
- Monitor business partners' work and hold them accountable. If you're aware of any unethical or illegal behavior, [speak up](#) immediately.

#### CHOOSE BUSINESS PARTNERS WISELY

- Know that our business partners act as extensions of our business. Whatever they say and do reflects on JELD-WEN, so if you choose our business partners, choose carefully and fairly. Base your decisions on factors like:
  - Experience
  - Products and services offered
  - Price
  - Quality and safety record
  - Delivery record
- Keep any [personal biases](#) out of your decision-making.

#### DOING YOUR HOMEWORK

When choosing business partners:

- Follow our contracting policies.
- Do good research – make sure they have a good reputation.
- Make sure they can represent JELD-WEN well and enhance the quality of our products.
- Make sure they only obtain materials from socially responsible sources – never using "[conflict minerals](#)."
- Don't partner with anyone with a history of ethical violations.
- Don't partner with any [restricted entities, individuals or countries](#).



#### LOOK INSIDE

[Supplier Code of Business Conduct](#)



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# BEING GOOD STEWARDS

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WE LOOK FAR BEYOND THE WALLS OF OUR BUSINESS, UNDERSTANDING THE EFFECT WE HAVE ON THE PEOPLE AND THE PLANET WE CALL HOME AND EMBRACING OUR RESPONSIBILITY TO MAKE IT BETTER FOR EVERYONE.

## AROUND THE WORLD

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- PRESERVE OUR ENVIRONMENT 43

## AROUND THE CORNER

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## AROUND THE WORLD PROTECT HUMAN RIGHTS

OUR BUSINESS IS DESIGNED FOR AND POWERED BY PEOPLE. WE STAY PEOPLE-FOCUSED BY WORKING TO PROTECT INDIVIDUALS' RIGHTS AND THEIR BASIC HUMAN DIGNITY, NO MATTER HOW OR WHERE THEY CONTRIBUTE TO JELD-WEN'S BUSINESS.



### BRING INTEGRITY HOME

#### KNOW AND FOLLOW THE LAW

- Recognize that laws exist around the world to protect human rights and ensure free, safe and fair working conditions and pay. Know these laws in the countries where you do business.
- Be aware that laws may differ from country to country, so ask the [Legal Department](#) if any requirement is unclear.

#### HUMAN RIGHTS ABUSES MIGHT LOOK LIKE ...

- Child labor
- Modern slavery
- Human trafficking
- Forced or compulsory labor
- Physical punishment
- Unsafe working conditions
- Unfair pay
- Unreasonable or illegal work hours

#### HELP STOP ABUSES

- Support JELD-WEN's commitment to protecting human rights by keeping potential abuses out of our business and our supply chain.
- If any of your work involves employment issues (whether it involves our own associates or those of our business partners), focus on fair treatment.

- Highlight diversity, equity and inclusion in every interaction and transaction. Never stand for business practices that limit human rights or sacrifice human dignity.
- If you work with our business partners, hold them to the same high standards. Work with [ethical business partners](#). Never do business with any entity that may be engaging in human rights abuses.
- Source materials responsibly. Make sure our business partners don't manufacture or use conflict minerals, which may contribute to unrest in some countries.
- If you ever see signs of human rights abuses in our business, our supply chain or in a third party's operations, we need to know. [Speak up](#) immediately.



### PICTURE THIS

**I SAW A COMMENT ON SOCIAL MEDIA ALLEGING THAT ONE OF OUR BUSINESS PARTNERS PROCESSES CONFLICT MINERALS. SINCE THIS IS JUST A SOCIAL MEDIA RUMOR, SHOULD I LET IT GO?**

No, you shouldn't. Although it may be a rumor, we need to know right away if any of our business partners is doing something to violate human rights. We take violations like this seriously, so speak up about what you've seen so we can investigate and, if necessary, take appropriate action.



### LOOK INSIDE

[Conflict Minerals Policy Statement](#)  
[Supply Chain Transparency](#)

## AROUND THE WORLD PRESERVE OUR ENVIRONMENT

ENVIRONMENTAL STEWARDSHIP HAS BEEN AND ALWAYS WILL BE A KEY PART OF WHO WE ARE AT JELD-WEN. IT'S UP TO EACH OF US TO CARRY ON THIS LEGACY FOR THE NEXT GENERATION BY CONSERVING RESOURCES, PROMOTING SUSTAINABILITY AND BUILDING HEALTHIER ENVIRONMENTS.



### BRING INTEGRITY HOME

#### FOLLOW THE LAW

- Get to know and follow the environmental laws that apply to our business, wherever in the world we operate.
- Complete all required training to ensure that you're complying with our policies as well as the law. [Ask for guidance](#) if you're ever unsure how a law applies.

#### REDUCE OUR FOOTPRINT

- Help us run a cleaner, greener business by following JELD-WEN's policies and environmental initiatives, especially in the way we handle, store and dispose of waste, including hazardous waste.
- Do your part to conserve, recycle or reuse resources and reduce our carbon footprint.
- Prevent energy waste to preserve our vital resources.
- If you design our products, focus on dependability and energy efficiency.
- Work with customers and business partners who are leaders in green building and sustainable manufacturing.

#### GIVE NEW LIFE TO OUR MATERIALS

- If your work involves designing and sourcing materials for JELD-WEN, choose virgin materials derived from sustainable sources whenever possible.
- Also choose sustainable and responsible materials that facilitate reuse and recycling and ensure our use of [conflict-free minerals](#).
- Do you suspect an environmental hazard or violation? Don't ignore it, and don't wait. [Speak up](#) right away to help us minimize potential damage.

#### MAKING IT PERSONAL

Protecting our planet is an around-the-clock job. Continue our efforts at home by:

- Recycling materials when you can
- Reducing waste in your consumption of food
- Shopping locally to support farmers near you
- Picking up litter whenever you see it
- Reducing your use of water and electricity
- Using eco-friendly products



### LOOK INSIDE

[JELD-WEN ESG Report](#)

## AROUND THE CORNER SUPPORT OUR COMMUNITIES

AT THE HEART OF OUR BUSINESS IS A PASSION FOR IMPROVING THE LIVES OF OTHERS. FROM ENSURING FAIR TREATMENT GLOBALLY TO GIVING BACK LOCALLY, WE STRIVE TO SUPPORT OUR COMMUNITIES EVERYWHERE WE OPERATE.

### BRING INTEGRITY HOME

#### GIVE WITH US

- Know that you are encouraged, but never required, to contribute your time, talent or any other resource to corporate charitable initiatives.
- Look for opportunities to support JELD-WEN corporate charitable initiatives in your location.
- Share information about our corporate initiatives in ways that may increase awareness as well as impact.

#### HOW IS JELD-WEN GIVING BACK?

Previous corporate initiatives include:

- Donating nearly \$2 million to the United Way
- Donating all windows, doors and raffle ticket proceeds to the St. Jude Dream Home® Giveaway
- Planting 5,000 trees across the globe in partnership with One Tree Planted
- Sponsoring the Make-A-Wish® Ball, which funds full wishes for critically ill children
- Donating over \$6,000 to local French charities, Les Restos du Cœur, L'épicerie Sociale, La Croix Rouge (French Red Cross), and La Ligue Contre le Cancer
- Participating in the Susan G. Komen Race for the Cure®
- Donating a custom glass door to the Helsinki, Finland, Ronald McDonald House
- Donating \$25,000 to the American Heart Association
- Raising funds to restore power and repair damaged property after devastating storms in Australia



## AROUND THE CORNER SUPPORT OUR COMMUNITIES



### GIVE ON YOUR OWN

- Make sure any personal volunteer activities are lawful and don't create a **conflict of interest** with the work you do here.
- When contributing to personal causes you care about, make it clear that your views are your own. Give on your own time and with your own resources, and only use JELD-WEN's name, funds, branding and other resources if you have prior approval.
- Never pressure or ask customers, business partners or coworkers to support your personal charitable activities while on company property or on company time.



### PICTURE THIS

**A CUSTOMER ASKED ME FOR A CHARITABLE DONATION FOR A CAUSE THAT I CARE DEEPLY ABOUT. I WOULD LIKE TO OFFER MY SUPPORT. IS THAT OK?**

Maybe. Speak to a manager or someone in Human Resources to make sure. While we want to support our communities, we also want to ensure that your donation wouldn't appear improper in any way. Believe it or not, charitable donations can sometimes be viewed as bribes, and we would never want your good intentions to be misinterpreted.

## AROUND THE CORNER PARTICIPATE RESPONSIBLY IN POLITICAL ACTIVITIES

WE RESPECT THE RIGHTS OF OUR ASSOCIATES TO ENGAGE IN THE POLITICAL PROCESS, WHILE ALSO HONORING THE DIVERSITY OF VIEWPOINTS ON OUR TEAM. BY KEEPING POLITICS SEPARATE FROM WORK, WE EMPOWER EVERYONE TO EXERCISE THEIR CIVIC DUTIES IN WAYS THAT ARE PERSONALLY MEANINGFUL.



### BRING INTEGRITY HOME

#### KEEP POLITICS PERSONAL

- Never use JELD-WEN's name, funds or assets to support any political candidate, party or committee.
- Be sure that any voluntary personal contributions to candidates, political parties and civic organizations are made on an individual basis, using your own time and resources.
- Ensure your political activities are lawful and would not reflect negatively on our company.

#### HONOR OUR CORPORATE RESPONSIBILITIES

- Note that, as a company, we may employ the services of a lobbyist. However, individual associates should never engage in lobbying activities on our company's behalf.
- For those involved in any corporate lobbying activities, be sure to follow all registration and notification requirements.
- Remember, any gift or payment to a government official, including politicians, with the hope of a business-related favor in return may be considered a **bribe** and, therefore, prohibited.



### PICTURE THIS

**I HAVE A GOOD FRIEND WHO IS RUNNING FOR POLITICAL OFFICE AND HAS ASKED IF I WOULD ENDORSE THEM AT A RALLY BEING HELD OUTSIDE WORK HOURS. IS THAT A PROBLEM?**

No, generally this should not be a problem. Just make it clear that your endorsement is your own personal action and that you're not speaking on behalf of JELD-WEN.

#### WHAT'S CONSIDERED A POLITICAL ACTIVITY?

Examples include:

- Supporting political candidates
- Expressing opinions on political or public issues
- Wearing campaign attire
- Displaying campaign materials
- Certain lobbying activities

## LOOKING TO THE FUTURE

Thank you for reading JELD-WEN's Code of Business Conduct and Ethics.

It's the most important document you'll read as a member of our global team – the blueprint we follow to fulfill our vision and purpose with integrity. We know the Code covers a lot of ground, but understanding it is critical to us and to everyone we serve. After all, when we're all following the same set of plans and working toward the same goals, we get amazing results.

Your contribution to JELD-WEN is critical. When you're truly **At Home With Our Values** and our Code, you show the world who we are as a company and what we stand for. We are a team that ...

- Understands the risks we face
- Lives our Values
- Knows what's expected of us
- Makes informed, ethical decisions
- Takes action and asks questions
- Commits to constant improvement

If you have questions about the Code, our policies or any of the rules that apply to us, [speak up](#). Your voice, your concerns and your questions matter to us, so let us hear from you. When we're united on this journey, we'll build a house where future generations will always come to feel at home.



## FINDING HELP

If you have questions or need guidance, we're ready to help:

Issues or Concerns	Contact
To ask questions or report potential misconduct or other ethical concerns	<ul style="list-style-type: none"> <li>Your direct supervisor</li> <li>Your Human Resources representative</li> <li>The <a href="#">Legal Department</a></li> <li>A member of senior leadership</li> <li>The Board of Directors</li> </ul> <p>Or, if you prefer, you also may contact: The JELD-WEN Ethics Helpline Available 24 hours a day, seven days a week By phone at 1-855-244-4794 Or online at <a href="http://jeld-wen.ethicspoint.com">jeld-wen.ethicspoint.com</a></p>
For company policies	<a href="mailto:PolicyQuestions@jeldwen.com">PolicyQuestions@jeldwen.com</a>
For legal questions	<a href="mailto:LegalHelp@jeldwen.com">LegalHelp@jeldwen.com</a>
For information on company benefits	<a href="mailto:Benefits@jeldwen.com">Benefits@jeldwen.com</a>
For analyst, investor, or financial questions	<a href="mailto:InvestorRelations@jeldwen.com">InvestorRelations@jeldwen.com</a>
For media requests	<a href="mailto:MediaNA@jeldwen.com">MediaNA@jeldwen.com</a>
For concerns of data breaches	<a href="mailto:DataProtectionJW@jeldwen.com">DataProtectionJW@jeldwen.com</a>

JELD-WEN reserves the right to modify this Code at any time, as necessary, along with our policies, procedures and conditions of employment. The Code is not intended as a contract or guarantee of employment.

No waiver of this Code may be made for a member of our Board of Directors or an executive officer without the written waiver of our Board of Directors. Any such waiver must then be disclosed to the company's stockholders, along with the reasons for granting the waiver.

We also support our associates' right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right. That includes activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues.