



## **INSTALLED BUILDING PRODUCTS – SUPPLIER CODE OF CONDUCT**

Installed Building Products, Inc. (“IBP”) is committed to the highest standards of product quality and business integrity in its dealings with customers and suppliers. As a result, all Suppliers and the IBP employees with whom they work are expected to conduct themselves with the highest standards of honesty, fairness and personal integrity. It is critical to IBP that Suppliers and employees alike maintain high ethical standards, adhere to all applicable laws, and avoid even the perception of impropriety or conflict of interest.

This policy applies to all IBP suppliers and partners. “Supplier” means any person, business, company, corporation, or other entity that sells, or seeks to sell, goods or services to IBP and its subsidiaries, including the Supplier’s directors, officers, managers, employees, agents and other representatives.

### **Legal Compliance**

The Supplier Code of Conduct (“Code”) is intended to provide the principles necessary to ensure that all of our Suppliers conduct business in an ethical and sustainable manner and in accordance with all applicable laws and regulations, including labor, human rights, anti-corruption, anti-bribery, and environmental matters. It is each Supplier’s responsibility to know the treaties, laws and regulations in its respective countries, states and communities of operation.

### **Labor and Human Rights**

IBP recognizes the importance and responsibility to respect human rights. All Suppliers are expected to have principles and practices similar to or compatible with IBP’s Human Rights Policy ([Our Human Rights Policy - Available Here](#)):

- We are committed to equal opportunity and expect our Suppliers to maintain workplaces free from discrimination and harassment on the basis of: race, color, age, religion, sex, national origin, ancestry, gender, sexual orientation, gender identification, disability, military status, veteran status, or any other status protected by law.
- IBP is committed in policy and practice to providing equal employment opportunities for all applicants and employees based upon their training, experience, and overall qualifications and expect the same from our Suppliers. This applies to all aspects of the employment relationship, including but not limited to: recruiting, hiring rates of pay and other compensation, benefits, promotions, transfers, demotions, terminations, reductions in force, training,

working conditions, disciplinary actions, and all other terms, conditions, or privileges of employment.

- Health and safety is of primary importance in every aspect of IBP's activities. Our Suppliers are expected to protect against industrial accidents, injuries, and illnesses, in compliance with applicable safety and health laws and regulations. Each Supplier should provide adequate training and supplies necessary to provide a place of employment free from recognized hazards that cause, or are likely to cause, physical harm.
- Suppliers are expected to maintain a workplace free from violence, harassment and other unsafe or disruptive conditions.
- Suppliers are expected to strictly prohibit the use of all forms of forced labor and child labor, and any form of human trafficking. Suppliers are expected to prohibit the hiring of individuals under 18 years of age for positions in which hazardous work is performed.

## **Ethics**

All Suppliers are expected to conduct business with the highest ethical standards, including but not limited to:

- Compliance with the U.S. Foreign Corrupt Practices Act (FCPA), and similar laws in foreign jurisdictions where a Supplier conducts business. Under these laws, it is illegal to offer or make improper payments to public officials, including staff at all levels of government, candidates for political office and employees of government entities.
- Compliance with all applicable laws relating to corruption, fraud, bribery and extortion.
- Compliance with all applicable antitrust laws, including price fixing and rigged bids.
- Compliance with all applicable laws relating to creation, retention and disposal of records. Suppliers shall immediately report any suspected data breach that may impact IBP, its employees, customers or shareholders.
- Suppliers shall not enter into a financial or any other relationship with an IBP employee that creates any actual, potential or perceived conflict of interest for IBP. A conflict of interest arises when the personal interests of the IBP employee are inconsistent with the responsibilities of his/her position with the company. All such conflicts must be disclosed and remedied immediately.

## **Gifts and Entertainment Policy**

Consistent with our Code of Business Conduct and Ethics, IBP employees may give and receive gifts or entertainment provided they do not violate Supplier's rules and comply with the "Acceptable" requirements detailed below.

**Acceptable** - As long as a gift is not intended to obtain favorable treatment from IBP and does not create the appearance of a bribe, kickback, payoff or other irregular type of payment, or otherwise raise any potential conflicts of interest, IBP employees may accept a gift or entertainment from a Supplier as long as all the following requirements are met:

- The aggregate value of all tangible gifts and entertainment are of nominal value
- The gift does not consist of cash
- Public disclosure of the gift would not damage IBP's or the Supplier's reputation
- The gift is reasonable and appropriate
- Acceptance of the gift does not violate any applicable laws

**Any gift that does not fall within these parameters** must be approved in advance via email to: [compliance@installed.net](mailto:compliance@installed.net)

## **Environmental**

Installed Building Products recognizes the importance of environmental preservation and the direct connection between our business and the health of our planet and communities. Our Suppliers are expected to comply with all environmental laws and regulations in the countries, states and localities in which they operate, and to act to minimize the adverse environmental impacts of their operations, including but not limited to:

- Efficient use of natural resources to minimize waste generation through recycling efforts, prevention of pollution, and utilization of products made from recycled content, where possible
- Maintenance of facilities, equipment, and fleet to minimize atmospheric emissions
- Working towards the reduction of greenhouse gas and other harmful emissions
- Managing the safe handling, movement, storage and disposal of chemicals and other hazardous substances which pose a threat to the public and the environment.
- Suppliers are expected to comply with the Clean Water Act ([Summary of the Clean Water Act | US EPA](#))

## **Conflict Minerals**

Conflict minerals are resources that are mined and used to influence and finance armed conflict, human rights abuses, and violence. These include: gold, tantalum, tin, and tungsten, as well as their derivatives, and any other mineral or its derivative determined by the U.S. State Department to be financing armed conflict, human rights abuses, and violence in the Democratic Republic of the Congo or an adjoining country.

IBP will not transact business with any Supplier that engages in the processing, manufacturing, and sale of products containing conflict minerals originating from the Democratic Republic of the Congo or an adjoining country.

### **Product Quality**

All IBP Suppliers shall supply IBP products free from defect and conforming in all respects to the respective contract requirements including, in particular, quality requirements. In addition, all supplied products must meet all applicable/required certifications from the appropriate accredited certification body.

### **Political Contributions or Charitable Donations**

All IBP Suppliers are prohibited from making any type of political contribution or charitable donations on IBP's behalf.

### **Unauthorized Lobbying**

IBP's Suppliers, are not authorized to undertake any type of lobbying or other similar representative efforts on IBP's behalf before any kind of government entity, official, body or representative without prior written consent.

### **Monitoring and Compliance**

IBP reserves the right to modify and provide timely updates of this Supplier Code of Conduct.

Suppliers must disclose information about labor, health, environmental, safety, business activities, and financial condition in accordance with prevailing industry practice, and cooperate with IBP on information or audit requests to confirm compliance with the Supplier Code of Conduct. IBP may conduct periodic reviews or submit questionnaires to ensure compliance with the Supplier Code of Conduct. Each Supplier agrees to the timely completion and return of any questionnaire or compliance request. It is IBP's expectation that any required corrective action will be resolved in a time frame jointly agreed by the Supplier and IBP.

Each Supplier will promptly notify IBP regarding any known or suspected improper behavior by IBP employees or any violation or suspected violation by the Supplier's employees of this Supplier Code of Conduct, including their respective directors, officers, managers, employees, agents, and other representatives.

To that end, IBP has implemented a Whistleblower Policy, available for review on the IBP website ([Corporate Governance | Installed Building Products, Inc.](#)). IBP has retained the services of a third-party ethics and compliance hotline. Suppliers may submit concerns regarding alleged misconduct (confidentially and anonymously, if desired) in one of the following ways:

- Via telephone hotline at the following number: **(877) 938-0006**
- Via secure form accessible through the following internet address: [www.lighthouse-services.com/installed](http://www.lighthouse-services.com/installed); or
- Via email at the following address: [lighthouse@installed.net](mailto:lighthouse@installed.net)

Suppliers may also submit concerns regarding alleged misconduct to:

[compliance@installed.net](mailto:compliance@installed.net), or confidentially and anonymously, if desired, by mail to the attention of: (1) General Counsel, (2) Chief Executive Officer, and/or (3) Chair of the Audit Committee at the following address:

Installed Building Products  
495 South High Street, Suite 50  
Columbus, OH 43215

### **Webpages Referenced**

[IBP Human Rights Policy](http://installedbuildingproducts.com/human-rights-policy/) - [installedbuildingproducts.com/human-rights-policy/](http://installedbuildingproducts.com/human-rights-policy/)

[IBP Code of Business Conduct and Ethics](http://investors.installedbuildingproducts.com/static-files/f999076e-c4bf-446f-bf2c-b339a85db48c) - [investors.installedbuildingproducts.com/static-files/f999076e-c4bf-446f-bf2c-b339a85db48c](http://investors.installedbuildingproducts.com/static-files/f999076e-c4bf-446f-bf2c-b339a85db48c)

[IBP Whistleblower Policy](http://investors.installedbuildingproducts.com/static-files/be45b5a2-5394-426b-beb8-d7d0f9617ea9) - [investors.installedbuildingproducts.com/static-files/be45b5a2-5394-426b-beb8-d7d0f9617ea9](http://investors.installedbuildingproducts.com/static-files/be45b5a2-5394-426b-beb8-d7d0f9617ea9)

[US EPA Clean Water Act](http://www.epa.gov/laws-regulations/summary-clean-water-act#:~:text=The%20Clean%20Water%20Act%20(CWA,quality%20standards%20for%20surface%20waters.) - [www.epa.gov/laws-regulations/summary-clean-water-act#:~:text=The%20Clean%20Water%20Act%20\(CWA,quality%20standards%20for%20surface%20waters.](http://www.epa.gov/laws-regulations/summary-clean-water-act#:~:text=The%20Clean%20Water%20Act%20(CWA,quality%20standards%20for%20surface%20waters.)