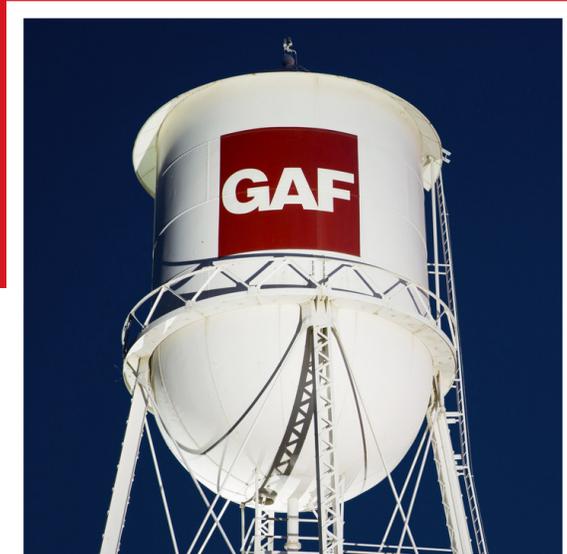




# Supplier Code of Conduct

September 2025



## We protect what matters most

GAF, a Standard Industries company and North America's largest roofing and waterproofing manufacturer, has been protecting homes, businesses, families, and communities with our products for more than 135 years. To sustain this success, GAF has depended on continual innovation, a relentless focus on its customers, and a commitment to act ethically and in accordance with law in its operations.

GAF strives to protect its people, its communities, and our planet for a more sustainable future. Accordingly, Suppliers should demonstrate a commitment to meet the needs of the current generation in a way that does not compromise the potential of the future generations.

This Supplier Code of Conduct sets forth GAF's expectations for all Suppliers which provide products or services to GAF. We expect all Suppliers to act in compliance with this Supplier Code of Conduct across their business and supply chain, and to adhere to all applicable laws and regulations that support this Supplier Code of Conduct.

GAF's goal is to operate transparently and in accordance with applicable laws, and it expects its Suppliers to conduct business in the same manner. If you observe or learn of any conduct in violation of this Supplier Code of Conduct, you should contact the Standard Industries Ethics Hotline via its website or by telephone.

## **Business ethics**

GAF is committed to acting honestly, ethically, and in accordance with applicable law when conducting business, and expects Suppliers associated with GAF to act in the same manner.

## **Bribery, corruption, and sanction laws**

Suppliers must comply with applicable laws, such as but not limited to the United States Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act of 2010, and must not offer, promise, give, request, or accept a bribe. Suppliers are prohibited from conferring impermissible payments or illegal benefits upon any business partner, public authority, or Supplier to obtain an outcome favorable to themselves or to GAF. While unsolicited nominal gifts and business amenities may be exchanged, such gifts are not permitted where they are intended to influence business decisions or induce any party to act contrary to law.

## **Conflicts of interest**

Suppliers should disclose any conflict of interest to GAF as soon as the Supplier is aware of the conflict of interest. A conflict of interest exists when the nature of the work to be performed under a contract or purchase agreement may give a Supplier an unfair competitive advantage or when the Supplier has other interests that may impair its objectivity.

## **Antitrust, fair competition, and trade**

Suppliers must comply with all applicable antitrust and competition laws, and follow the principles of fair and open competition, and any rules regarding the exchange of commercially sensitive information such as pricing, pricing strategies, terms and conditions, or market analysis.

All Suppliers must also adhere to applicable trade controls and export, re-export, import laws and regulations, and sanctions.

## **Conflict minerals**

Suppliers must ensure that products or materials supplied to GAF do not contain metals derived from minerals or their derivatives originating from conflict regions that directly or indirectly influence, finance, or benefit armed groups and cause or encourage human rights abuses.

## **Human rights and labor**

Suppliers should treat everyone with dignity and respect at all times, and should respect and support human rights in accordance with local, national, and international standards, such as the UN Guiding Principles on Business and Human Rights.

## **Non-Discrimination**

Suppliers shall not discriminate or harass anyone on the basis of race, color, religion, sex, age, caste, ethnicity, national origin, genetic information, marital status, disability or medical condition (as defined by applicable law), pregnancy, childbirth or related medical condition, gender identity or expression, sexual orientation, veteran status, or any other category protected by law. Suppliers shall comply with the Equal Employment Opportunity regulations if in the United States or equivalent legislation outside the United States.

## **Child labor and compulsory labor**

Child labor and all forms of compulsory labor shall not be permitted in any capacity, including forced labor, slavery, and trafficking. Suppliers must comply with all applicable modern slavery laws and regulations. Suppliers also shall not employ anyone under the minimum age as permitted by law in the jurisdictions in which the Supplier operates, or under the minimum ages set forth under the International Labour Organization's Minimum Age Convention for the type of work being performed, whichever is greatest. All work performed by workers of a Supplier must be voluntary and workers shall have the right to leave employment at any time, under their own volition.

## **Freedom of association**

Suppliers should establish favorable employment conditions, maintain effective employee communication, and provide a method for employees to raise grievances without fear of retribution. Suppliers shall respect employees' legal rights to organize, unionize, and collectively bargain, and shall not retaliate against employees who engage in these protected activities.

## **Minimum wage and benefits**

Suppliers must meet the requirements as set by local laws and regulations related to the payment of wages, overtime hours, piece rates, and other elements of compensation, and provide legally mandated benefits where applicable.

## ☑ Environment, health and safety

GAF places the safety and well-being of its employees, contractors, and partners first. In addition to committing to continuous improvement of its health and safety management system and performance, GAF also considers the long-term impact of its business on the health of the planet, and operates in a manner that respects the environment and makes sustainability a priority.

## ☑ Occupational health and safety

Suppliers must comply with all applicable safety and health laws and regulations, and should otherwise adopt proper procedures and controls to provide safe and healthy working conditions for all employees and contractors including documented health and safety policies (including, without limitation, as pertains to appropriate personal protective equipment, which shall be provided or paid for by Supplier) as well as plans and procedures for emergency situations in the workplace. Such plans and procedures should be available in the primary language of all employees.

## ☑ Product safety

Suppliers shall comply with product-safety regulations and product-labeling guidelines, and should clearly communicate product-handling instructions and requirements by providing all necessary safety information for all hazardous substances in their products where required to do so, including product information and safety data sheets.

## ☑ Environmental permits and reporting

Suppliers must have required environmental permits and registrations in place and kept current in accordance with local laws and regulations.

## ☑ Pollution prevention and resource efficiency

Suppliers shall have applicable and appropriate pollution-prevention controls in place to regulate emissions and discharges of emissions. Suppliers should monitor their use of natural resources including water, fossil fuels, and minerals, and should consider practices to reduce the environmental impact of the products they sell us.

## ☑ Business continuity

Suppliers should have appropriate business-continuity plans in place for any operations that support GAF's business, in order to maintain resiliency in responding to a disruption of operations. Such plans should include disaster recovery, crisis management, and preventative measures to avoid and mitigate risks associated with a disruption of operations.

## ☑ Information security

GAF expects all Suppliers to act in a manner that will safeguard data shared with the Supplier, to protect GAF's confidential and proprietary information, and to comply with all applicable data security and data protection laws. If a Supplier experiences a data security breach, it must be reported to GAF within 24 hours of learning of the breach, unless the Supplier's contract with GAF requires a shorter notice period.

## ☑ Intellectual property and business information

Suppliers should protect GAF's confidential information which includes, but is not limited to, confidential business information, strategic plans, financial data, technical and business information, information regarding our employees, intellectual property, patents, and trademarks.

Questions? Email [sustainableSupplychain@gaf.com](mailto:sustainableSupplychain@gaf.com)