

SUPPLIER CODE OF CONDUCT



Contents

1	LABOR	PAGE 04
2	SAFETY, ENVIRONMENT & QUALITY	PAGE 06
3	ETHICS	PAGE 08
4	MANAGEMENT SYSTEMS	PAGE 10

Introduction

ABOUT LP BUILDING SOLUTIONS

Louisiana-Pacific Corporation ("we" or "LP") is a leading provider of high-performance building solutions that meet the demands of builders, remodelers, and homeowners worldwide. Serving the new home construction, repair and remodeling, and outdoor structures markets, we have leveraged our expertise to become an industry leader known for innovation, quality, reliability, and sustainability. Our customers include retailers, wholesalers, and home building and industrial businesses in North America and South America, with limited sales in Asia, Australia, and Europe.

Since our founding in 1972, LP has been Building a Better World™ by helping customers construct beautiful and durable homes. We are headquartered in Nashville, Tennessee and operate more than 20 plants across the U.S., Canada, Chile, and Brazil.

LP strives to achieve the highest level of safety, integrity, and fairness by conducting our business according to the highest ethical standards. This Supplier Code of Conduct embodies these core values and reflects LP's commitment to safety, integrity and fairness. As part of this commitment, LP requires any company or entity that sells or seeks to sell, whether directly or indirectly, any products or services to LP or any of its affiliates (our "Suppliers") to share in these same core values.

This Supplier Code of Conduct applies to all LP Suppliers. LP expects its Suppliers to operate using the highest ethical and legal principles, including the principles set forth in the United Nations Universal Declaration of Human Rights, the applicable portions of the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Suppliers are responsible for ensuring that any employees, affiliates, distributors, subcontractors, agents, or other representatives of Suppliers providing products or services to LP, or to LP's customers on behalf of LP, read and comply with this Supplier Code of Conduct.

Because LP is an international company and conducts business in many countries throughout the world, Suppliers must comply with the applicable laws, rules, and regulations in all countries where LP and its affiliates conduct business. Specifically, we expect all Suppliers to adhere to the following and to require their suppliers to do the same.

Labor

We expect our Suppliers to uphold the principles outlined in LP's Human Rights Policy and to prioritize the safety, well-being, human rights, and dignity of all individuals whose talents and hard work help us deliver our products and services. Suppliers are expected to treat their employees fairly, in accordance with laws and industry standards, and to apply sound employment practices in all facets of the employment relationship, including those that pertain to wages, working hours, overtime, benefits, and employee rights. Suppliers are expected to ensure that employee work schedules and overtime are provided in a manner consistent with all applicable laws, including maximum hour and rest period laws.

LP expects Suppliers to ensure that no abusive or exploitive conditions or unsafe working conditions exist at any Supplier facilities. This includes the following aspects:

FAIR WORKING CONDITIONS

Suppliers are expected to provide safe working conditions and to proactively manage health and safety risks so that occupational injuries and illnesses are prevented. Suppliers should implement management systems and controls to identify and remediate potential safety hazards, and they must provide access to emergency response facilities, essential fire safety equipment, emergency aid kits, potable drinking water, and adequate restrooms.

EMERGENCY PREPAREDNESS

Suppliers are expected to provide employees with appropriate training and hold regular drills, as necessary, to ensure employee preparedness in case of an emergency.

DIGNITY AND RESPECT IN THE WORKPLACE

Suppliers are expected to provide a fair workplace, free from discrimination, harassment, or any other form of abuse. LP expects that: (a) Supplier hiring decisions will be based on qualifications, skills, performance, and experience; (b) Suppliers will work to ensure that work environments at Supplier facilities foster encouragement and respect among employees and business partners regardless of culture or background; and (c) Suppliers will not tolerate any form of harassment in their operations, including unwelcome verbal, visual, physical, or other conduct that creates an intimidating, threatening, offensive, or hostile work environment.

FORCED LABOR AND CHILD LABOR

Suppliers will not utilize, or source products or services from other individuals or entities associated with forced, bonded, indentured, involuntary, or exploitative prison, trafficked, or slave labor. Involuntary labor includes transporting, harboring, recruiting, transferring, receiving, or employing persons by means of threat, force, coercion, abduction, or fraud for labor or services. Suppliers must ensure that all labor used in their operations is voluntary, and that workers shall be free to terminate their employment at any time. There shall be no unreasonable restrictions on entering, exiting, or moving within Supplier-provided facilities. Suppliers will take reasonable efforts to ensure that their own suppliers, agents and subcontractors comply with these requirements.

LP does not condone child labor, and we strive to eliminate all forms of child labor. Suppliers that do business with LP are prohibited from using child labor of any kind. Suppliers must ensure that their employees meet the applicable minimum working age in any location where they operate. To ensure compliance, Suppliers must create and maintain verifiable documentation regarding employees' ages, and Suppliers must ensure that their employee recruitment practices, including recruitment performed by third party contractors, include appropriate mechanisms to verify employees' and applicants' ages.

FREEDOM OF ASSOCIATION

Suppliers must respect the right of employees to freely organize and bargain collectively.

2 Safety, Environment & Quality

Suppliers are expected to provide a safe environment and operate in an environmentally responsible manner. Suppliers will integrate quality into their business processes. This includes the following aspects:

SAFETY

LP is committed to keeping a focus on safety in everything we do, and we will do business only with Suppliers that demonstrate a commitment to safety. We expect Suppliers to do the following:

- Make continuous efforts to achieve and sustain a workplace that is free from workrelated injury and illness.
- Conduct their operations in a manner consistent with all applicable safety standards, including governmental requirements, operations, and facility-specific safety requirements, and contractual requirements.
- Identify and respond to any public health impacts of their operations or the use of their products and services.
- Treat injured employees with respect and provide medical treatment for workplace injury and illness.
- Maintain a workplace free of the effects of alcohol and drug use.

QUALITY

We expect our Suppliers to: (a) uphold a commitment to achieving quality through adherence to our inspection, testing, grading, and customer performance standards; (b) prepare and maintain accurate product quality records; and (c) notify LP of issues that negatively impact the quality of the product or service being delivered, or that might harm public perceptions of LP.

SUSTAINABILITY AND ENVIRONMENT

Suppliers are expected to: (a) comply with all applicable environmental laws and regulations; (b) conduct their business operations with concern for the environment and work toward reducing adverse impacts where possible; (c) identify and implement opportunities for conservation of natural resources, including water, energy, and raw materials; and (d) reduce pollution and landfill waste. LP considers environmental responsibility to be an integral component of its own corporate ethics and operating principles. LP chooses to do business with Suppliers that share our commitment to environmental stewardship and implementing sustainable business practices that support our communities. As detailed in LP's annual Sustainability Report and our Sustainable Fiber Sourcing Policy, LP is committed to sourcing all of our wood fiber through rigorous certification systems—such as the Sustainable Forestry Initiative® in North America and the Programme for the Endorsement of Forest Certification in South America—and we expect our wood fiber suppliers to partner with us to support responsible forestry practices that actively address environmental and operational risks.

LP FACILITIES

While working at an LP facility, Suppliers are expected: (a) to be solely responsible for the quality, performance, behavior, supervision, and protection of their personnel; (b) not to engage in any work for or on behalf of LP while impaired by alcohol or other substances; (c) not to possess illegal drugs or controlled substances (except for legally obtained medications used as directed by a licensed medical practitioner); and (d) to be aware of and comply with LP's safety rules (including use of personal protective equipment) and emergency plans and response procedures. Suppliers will prohibit their workers from bringing weapons, firearms, and (unless approved by LP) hazardous materials to an LP facility.

3 Ethics

Suppliers are expected to conduct their business operations in an ethical manner. This includes the following aspects:

FAIR DEALINGS AND COMPETITION LAWS

Suppliers are expected to deal fairly with LP employees as well as their other business partners and should not take unfair advantage through manipulation, concealment, abuse, misrepresentation of material facts, or any other unfair dealing. Suppliers will not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of applicable antitrust and competition laws.

ANTI-BRIBERY AND ANTI-CORRUPTION

LP expects its Suppliers to do business in an ethical and transparent manner. LP requires its Suppliers to comply with all applicable anti-bribery and anti-corruption laws and not to participate in or endorse any corrupt practices in whatever form. Suppliers must not offer bribes, kickbacks, excessive gifts or hospitality, facilitation payments or other improper payments of any kind to government officials or other third parties for the purpose of obtaining or retaining business or gaining an improper advantage. Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act (FCPA) as well as the local anti-bribery laws in each jurisdiction in which they do business. LP expects its Suppliers to: take action to ensure that their employees are aware of all applicable anti-bribery and anti-corruption laws; to maintain anti-bribery and anti-corruption policies within their own operations; and to put systems in place to monitor and verify compliance.

INTELLECTUAL PROPERTY RIGHTS

Suppliers must respect and refrain from infringing upon the intellectual property rights of others, including patents, trademarks, copyrights, and other proprietary rights.

CONFLICT OF INTEREST

It is essential for Suppliers to avoid any improper influence or even the appearance of improper influence in the way they conduct their business. This includes avoiding personal or professional relationships which could compromise or reasonably appear to compromise a business partner or its employees' responsibilities and ability to make sound, impartial, and objective business decisions in connection with the business partner's relationship with LP. This includes any situations in which Suppliers are dealing with LP employees.

GIFTS AND ENTERTAINMENT

Whenever a gift or entertainment is offered in the context of a business relationship, there is a risk that it may influence or appear to influence a business decision. To build and maintain the trust of our stakeholders, LP generally prohibits its employees from accepting gifts or entertainment exceeding USD \$100 in value, including loans and guarantees, from any of the company's Suppliers. This applies both to LP employees and their immediate family members.

ETHICAL CULTURE

Employees of Suppliers are encouraged to work through their own company to resolve internal ethics issues. However, Suppliers should promptly report violations of this Supplier Code of Conduct or any unethical behavior by an LP employee to an LP manager or, if this is not feasible, to the LP Confidential line at 800-496-4892 or LPConfidential.lpcorp.com, available 24 hours a day, 365 days a year. Persons reporting concerns may choose to submit a report anonymously, and the LP Confidential line allows for two-way anonymous communication in such cases. When a reporting person self-identifies, LP will attempt to limit the disclosure of the reporter's identity; however, the reporting person can expect to be contacted by an LP representative as part of LP's investigation process. Information disclosed in connection with an investigation (including the identity of the reporting person and the identity of third parties involved in the reported matter) will, to the extent practical and appropriate, remain confidential during the course of the investigation in accordance with LP's Code of Business Conduct and Ethics, except as may be reasonably necessary under the circumstances to facilitate LP's investigation activities or to enable LP to take remedial action or comply with applicable law.

Management Systems

Suppliers are expected to implement management systems that facilitate compliance with this Supplier Code of Conduct. This includes the following aspects:

COMPLIANCE WITH THE LAW

LP is committed to obeying the law wherever it conducts business. We expect our Suppliers to comply with all applicable laws, including laws relating to employment, human rights, the environment, and health and safety. LP reserves the right to decline to do business or to suspend or terminate business dealings with Suppliers that do not comply with the law.

COMPLIANCE WITH THIS CODE

This Supplier Code of Conduct supplements but does not supersede any contracts between LP and the applicable Supplier. This Supplier Code of Conduct is not allinclusive. At a minimum, however, we require that all Suppliers meet the standards expressed herein. LP reserves the right to take responsive action following violation of this Code, including but not limited to suspension or termination of the business relationship (including any purchase orders and contracts). LP reserves the right to hold Suppliers responsible for reasonable costs of investigating non-compliance and appropriate remediation resulting from a Supplier's non-compliance.

CONFIDENTIALITY

Suppliers must protect the confidential information entrusted to them by LP, its affiliates, customers, or other LP Suppliers. Confidential information includes any business information of LP, its customers, or Suppliers that is not generally known to the public. In most cases, the terms of any agreement between LP and a Supplier are also confidential. Suppliers may only use and disclose such confidential information in a manner authorized by LP or as required by applicable laws.

INFORMATION SECURITY AND DATA PRIVACY

In order to do business with LP, suppliers may be provided with periodic or ongoing access to private data, information and records. Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification, and disclosure through appropriate cyber security processes and procedures. Suppliers must comply with all applicable data privacy laws and regulations. Suppliers shall ensure extension of this requirement to all sub-tier sources they employ.

ACCURATE FINANCIAL RECORDS

Each of LP's Suppliers is expected to keep accurate records of all matters related to the Supplier's business with LP. This includes the proper recording of all expenses and payments. If LP is being charged for a Supplier's employees' time, the related time records must be complete and accurate.

MONITORING COMPLIANCE

Suppliers must establish and maintain a process of ensuring compliance with this Supplier Code of Conduct. This includes communicating the requirements of this Supplier Code of Conduct to all employees, affiliates, agents, and subcontractors of the Supplier in their local language. Suppliers must maintain all documentation necessary to demonstrate their compliance with this Supplier Code of Conduct.

To ensure compliance with the standards and expectations set forth in this Supplier Code of Conduct, LP may periodically engage with Suppliers to visit Supplier facilities (including office facilities, manufacturing plants, warehouses and any other operating locations) in order to review Supplier records and conduct a full audit of Supplier operations. If LP determines that a Supplier has violated this Supplier Code of Conduct, LP may elect to provide the Supplier with a reasonable amount of time to correct the relevant violation(s), in which case the Supplier must provide information and records relating to the violation(s) and substantiating the corrective actions taken. Following review of such information and records, LP may conduct additional audit activities, including supplemental facility visits or inspections, to confirm that any violation has been corrected. Further terms and conditions regarding LP audit and inspection activities may be set forth in supply agreements between LP and individual Suppliers. LP reserves the right to terminate its commercial relationship with any Supplier for violations of law or of this Supplier Code of Conduct.

QUESTIONS

Other than related to reporting as outlined above, questions regarding this Code of Conduct can be directed to supplier.compliance@lpcorp.com.

