

**CORNERSTONE BUILDING BRANDS  
CORPORATE POLICY**

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EFFECTIVE DATE	09/01/2020
REVISION DATE	09/01/2020
POLICY OWNER	HR Operations

***Equal Employment Opportunity***

**P-HR-509**

**POLICY STATEMENT**

Cornerstone Building Brands, (the “Company”) provides equal employment opportunity to all applicants and employees in accordance with all applicable federal, state, and local laws. The Company will not discriminate against employees or applicants because of race, color, creed, religion, sex (including pregnancy or related medical conditions, gender identity, and sexual orientation), marital status, national origin, ethnicity, disability, handicap, age (age 40 or older), veteran status, military service or affiliation, genetic information or any other characteristic protected under applicable local, state or federal law.

**SCOPE AND APPLICABILITY**

This policy is applicable in the US and applies to all applicants, employees, personnel working on Company premises, regardless of whether they are employed by the Company or a third party, and visitors.

**COMPLIANCE WITH GOVERNING AUTHORITIES**

The Equal Employment Opportunity policy is provided in accordance with State and Federal laws, Company policy and Collective Bargaining Agreements (CBA). In the event of any conflict between this policy and applicable State and/or Federal law, Company Policy or Collective Bargaining Agreement, the policy or law that is most generous to the employee will take precedence.

**POLICY DETAILS**

- Applicants and employees will be recruited, hired, and trained in all job titles without regard race, color, creed, religion, sex (including pregnancy or related medical conditions, gender identity, and sexual orientation), marital status, national origin, ethnicity, disability, handicap, age (age 40 or older), veteran status, military service or affiliation, genetic information or any other characteristic protected under applicable local, state or federal law.
- Employment decisions will be made to further the principle of equal employment opportunity.
- All personnel actions will be administered without regard to race, color, creed, religion, sex (including pregnancy or related medical conditions, gender identity, and sexual orientation), marital status, national origin, ethnicity, disability, handicap, age (age 40 or older), veteran status, military service or affiliation, genetic information or any other characteristic protected under applicable local, state or federal law.
- All job applicants and employees will receive fair and equitable consideration in all matters pertaining to employment.
- Applicants will be considered for employment based upon criteria related to the job they will be expected to perform.
- Absent undue hardship, applicants and employees with a disability who are otherwise qualified will be provided reasonable accommodations so that they can perform the job which they hold, are seeking, or are applying.
- Absent undue hardship, the company will make reasonable accommodations based on an employee’s sincerely held religious beliefs.
- Minorities, women, covered veterans, and individuals with disabilities will be actively recruited, hired, and advanced in the workforce in accordance with this policy and the Company’s Affirmative Action plan.
- The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant.

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However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with a legal duty to furnish information.

- HR Compliance will monitor compliance with this policy.
- The Company is committed to assuring non-discrimination and equal employment opportunities. Employees at all levels are expected to support the Equal Employment Opportunity policy.
- Equal Employment Opportunity is a sound and just principle, and the Company is firmly bound to this principle, and obligated by state and federal law to insure Equal Employment Opportunity. The realization of this goal has the full support of the Company.

Any employee who feels they are the victim of discrimination in violation of this policy or otherwise becomes aware of a potential violation of this policy, has a responsibility to report their complaint(s) using the Reporting process defined in the Code of Conduct. The complaint does not need to be in writing but should be specific and include sufficient information to allow the Company to adequately investigate the complaint and to take appropriate action in order to resolve the situation.

**Who to Contact**

- Contact any other leader within your reporting structure
- Contact [Human Resources](#)
- Contact the [Legal or Compliance Department](#)
- Contact the **INTEGRITY HELPLINE**
  - Through the internet at [Cornerstonebuildingbrands.ethicspoint.com](http://Cornerstonebuildingbrands.ethicspoint.com)
  - Call using the appropriate numbers in the [Helpful Resources](#) section

*Figure 1 Code of Conduct Raising Questions and Concerns*

- If the Company determines a violation of this Equal Employment Opportunity policy has occurred, action will be taken commensurate with the severity of the offense, up to and including immediate employment termination. Appropriate action also will be taken to deter any future violations.
- The Company will not retaliate against any employee for filing a complaint, participating in an investigation of a violation of this policy, or requesting a reasonable accommodation and will not knowingly permit retaliation by the employee's co-workers, including employees in roles of authority.

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**REVIEW/REVISION BLOCK**

Rev #	Review/ Revision Date	Reason for Review or Revision
001	01/20/2020	New policy
002		

**APPROVALS**

Approval Date	Name	Title
11/23/2020	Michelle Mahony	Partner, Muskat, Mahony & Devine, LLP
	Kim Moore	VP, HR Operations