

# BEACON CODE OF ETHICS & BUSINESS CONDUCT





## DEAR FELLOW EMPLOYEES

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Beacon was founded on a set of principles that has guided our business practices and growth philosophy for over 90 years. Through explosive growth, rapid geographic expansion, and acquisition of building supply brands throughout the United States and Canada, we have sustained a values-based company culture. Our values continue to be the foundation of being a preferred partner for our customers, employees, suppliers, stockholders, and communities. Our Company's good reputation is well-earned based on the actions of our employees every day.

This Code of Ethics and Business Conduct ("Code") promotes our five foundational, shared Company values which go well beyond describing minimums for legal compliance. Our values encompass expected behaviors that we must carefully measure every day when we make business decisions. They include essential directives for all directors, officers, and employees:

- Put People First
- Make Every Day Safer
- Do the Right Thing
- Own Your Day
- Never Stop Building

Rather than cover every situation an employee may encounter, or every expected behavior, this Code highlights key issues under our values and identifies policies so employees can make decisions that comply with laws, reflect well on Beacon, and make our Company productive and proud. We treat others with respect and courtesy, and we transact business fairly. Our values will not be compromised for expediency or financial gain. Any success at the expense of our reputation would be short-lived.

We all want to work each day knowing that what we are doing and what we are asked to do is lawful, reputable, and safe. Making the right choice is not always easy, so I encourage you to ask questions and raise your compliance and ethics concerns with your supervisor, human resources representative, or through Beacon's dedicated Hotline. We protect our reputation by having the courage to question when conduct or behaviors don't match our values or the Code.

Working together under this Code, we continue to make Beacon a leader in the building materials distribution industry and a great place to work.

Julian G. Francis  
President and Chief Executive Officer

**BUILD  
MORE**

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## OUR VALUES INSPIRE PRINCIPLED PERFORMANCE

1

### PUT PEOPLE FIRST

We are dedicated to forging collaborative relationships that empower people to reach their maximum potential.

2

### MAKE EVERY DAY SAFER

We have an unwavering commitment to safety because a safe team is a healthy, happy, and successful team.

3

### DO THE RIGHT THING

Every day, we have a choice to do it the easy way or the right way – we choose to do it the right way every time.

4

### OWN YOUR DAY

We take pride in a job well done and are always willing to roll up our sleeves and put in the extra effort to overcome obstacles and get results.

5

### NEVER STOP BUILDING

The path from average to exceptional begins with hard work and we wake up motivated to be a little better today than we were yesterday.

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## ADOPTION AND APPLICATION OF CODE OF ETHICS AND BUSINESS CONDUCT

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The Board of Directors of Beacon Roofing Supply, Inc (BECN) (the “Company”) has adopted this Code of Ethics and Business Conduct (“Code”) to promote and ensure:

- (a) honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- (b) full, fair, accurate, timely, and understandable disclosure in reports and documents filed or submitted by the Company to the Securities and Exchange Commission (“SEC”) or communicated to the public;
- (c) compliance with applicable governmental laws, rules and regulations of the cities, states, and countries in which Beacon operates;
- (d) protection of Company assets, including corporate opportunities and confidential information;
- (e) adherence to Beacon’s five foundational, shared Company values;
- (f) the prompt internal reporting of violations of this Code; and
- (g) accountability for adherence to the Code.

### APPLICATION OF THE CODE

All directors, officers, and employees of Beacon Roofing Supply, Inc. and its subsidiaries are covered by the Code and are expected to understand and follow the purpose and provisions contained within the Code. External businesses and individuals interacting with Beacon must ensure adherence to laws, regulations, and other honest and ethical practices as outlined in this Code.



## REPORTING AND ENFORCEMENT

Of course, this Code cannot guarantee ethical behavior — only people can. All directors, officers, and employees have the personal responsibility to report behavior that they suspect or believe, in good faith, may violate this Code or any law or Beacon policy. Actions prohibited by this Code involving anyone other than a director or executive officer should be reported to the reporting person's supervisor, human resources manager, Internal Audit Department or to the Beacon Hotline at 1-866-574-1199 or [www.openboard.info/becn/index.cfm](http://www.openboard.info/becn/index.cfm).



Actions prohibited by this Code involving directors or executive officers must be reported either directly to the Chair of the Audit Committee at Beacon Roofing Supply, Inc., 505 Huntmar Park Drive, Suite 300, Herndon, VA 20170 or to the Beacon Hotline. Additionally, reports may be made to Frank Lonegro, Chief Financial Officer. Violations of the Code by any other person will be reported to the General Counsel or a designee as appropriate.

After receiving a report of an alleged prohibited action, the relevant supervisor, human resources manager and/or designee or the Audit Committee must promptly take all appropriate actions necessary to investigate. All directors, officers, and employees are expected to cooperate in any internal investigation of misconduct. Audit Committee investigations of violations by directors or executive officers will be reported to the Board of Directors.

Employees reporting law or Code violations may choose to remain anonymous or to identify themselves to facilitate communication. Investigators will take every reasonable precaution to keep a reporter's identity confidential, consistent with conducting a thorough and fair investigation.

Finding of a violation of applicable law or deviation from the standards embodied in this Code will result in appropriate preventative or disciplinary action, including, but not limited to, reassignment, demotion, dismissal, and potentially in cases of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

## NO RETALIATION FOR GOOD FAITH REPORTING

Directors, officers, and employees must feel free to make a report, ask a question, or participate in any investigation without fear of reprisal. Therefore, Beacon does not tolerate any form of retaliation against anyone who makes a good faith report of known or suspected acts of misconduct or other violations of this Code, Company policy, or the law. Good faith reporting means an individual has reason to believe wrongdoing occurred and they provide all the information regarding the incident that they reasonably believe to be true. A report is not in good faith if made with malice or with disregard for the truth. Based on its values and commitment, Beacon aims to resolve problems and pursue solutions in a way that is respectful to the individual and which, to the extent possible, considers the interests and requirements of all individuals concerned.

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## NO RIGHTS CREATED

This Code is a statement of certain fundamental principles, policies, and procedures that govern the Company's directors, officers, and employees. It is not intended to and does not create any rights for any employee, customer, supplier, competitor, stockholder, or other individual.



1

## PUT PEOPLE FIRST

We are dedicated to forging collaborative relationships that empower people to reach their maximum potential.

The hard-working people of this Company support local communities and are driven by one purpose — helping teammates, customers, and partners BUILD MORE. Beacon's reputation is built on a foundation of consistency, trust, and respect.

## EQUAL OPPORTUNITY | NO HARASSMENT

Beacon is committed to providing employees with good working conditions and competitive wages and benefits. Additionally, Beacon is committed to providing equal employment and advancement opportunities for all individuals without distinction or discrimination based upon an individual's race, color, sex, sexual orientation, sexual identity, national origin, age, religion, disability, pregnancy, veteran status, citizenship, genetic information, or any other characteristic protected by law. Employees are evaluated based on their performance.

Beacon will not condone or tolerate an atmosphere of tension and disrespect created by disparaging and offensive remarks or gestures related to a person's protected characteristics or unwelcome touching or sexual advances. Although it is not easy to define precisely what harassment is, it certainly includes slurs, abusive words or phrases, threats, derogatory comments, and unwelcome jokes. The purpose of this policy is not to regulate employees' personal morality, but to maintain a professional work atmosphere and to ensure that individuals are treated respectfully and are able to accomplish their jobs without being subjected to discrimination or harassment.

Individuals are encouraged to raise any matters of genuine concern internally or externally and to be taken seriously knowing that the matters will be investigated appropriately and as far as practicable be kept confidential. As with all reporting, the Company will not tolerate any retaliation against any person who provides information in good faith concerning possible misconduct. Any director, officer, or employee who violates this rule may be subject to disciplinary action up to and including termination of employment, as well as civil, criminal, and administrative penalties where appropriate.

## DISCRIMINATION SCENARIOS

**Q:** Ron is almost 62 years old and has worked in a busy Beacon branch warehouse for 28 years. A coworker continuously teases Ron about his age and refers to him as “old man” in front of customers and other staff. He tells Ron, “Soon Beacon is going to have to put you out to pasture.” Ron is offended by his coworker’s comments. How should he handle the situation?

**A:** Ron has a couple of options. If he is comfortable, he can talk to his coworker directly to let him know that his comments about Ron’s age are offensive to him. Ron also should consider notifying his supervisor or human resources representative that he is offended by his coworker’s comments.

**Q:** Samantha works at the counter inside a branch. Whenever a certain customer comes into the branch, he refuses to let her take his order and says to her: “I don’t want a woman to help me. Go get me one of the guys.” Samantha tells her coworker about the comment who reports it to their manager.

How should the manager handle this situation?

**A:** The manager is a steward of the code and is responsible for ensuring that employees are not subjected to discrimination or harassment in the workplace. The manager should discuss the issue directly with Samantha to ensure that she knows she is valued and supported in her role and then speak to the customer to explain that Beacon does not tolerate discriminatory treatment of an employee.



*Beacon will not condone or tolerate an atmosphere of tension and disrespect created by disparaging and offensive remarks related to a person’s protected characteristics or unwelcome sexual advances.*

2

## MAKE EVERY DAY SAFER

We have an unwavering commitment to safety because a safe team is a healthy, happy, and successful team.

Employees must take their responsibility to each other seriously and value honest communications and diverse perspectives.



## MAKE EVERY DAY SAFER

### SAFE OPERATIONS

Incidents and injuries are preventable, so the ability of Beacon's team members to return home injury-free every day is a critical measure of the Company's success. Individuals must work safely and diligently to remain on the team. Employees must obey all federal, state, and local safety regulations and exercise caution while working.

Where a condition appears to be unsafe or questionable, employees must immediately contact a supervisor or a safety leader to report the potential hazard. Beacon's managers and safety teams are expected to respond immediately to safety concerns and to follow the principles and standards outlined in the Safety Handbook. Where an employee is not comfortable reporting a safety concern to their manager, they may report concerns through the anonymous and confidential Beacon Hotline.

Beacon's commitment to safe operations continually improves the Company's performance and instills a sustainable culture of safety that extends to employees' families, customers, suppliers, and their communities at large.



- Q:** The boom truck is loaded and ready to leave the yard when the driver sees in the pre-trip inspection that a lug nut is missing from a front wheel. Reporting the issue will delay the truck leaving the yard and disrupt the delivery schedule for the morning. What should the driver do?
- A:** The driver must report the missing lug nut to the appropriate supervisor and delay the truck leaving the yard until the problem is fixed.



## HEALTH AND SAFETY TRAINING

Beacon provides current and relevant safety training and employee engagement throughout its organization to reach superior occupational health and safety performance. Beacon believes incidents can be avoided by engaging employees and others in addressing workplace hazards and risky behaviors before they occur. Beacon uses training, monitoring, and goal setting to move toward its objective of being an injury-free workplace. Employees are expected to meet or exceed regulatory compliance and to constantly incorporate safety training into their daily work routines to remain on the Beacon team.

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## ENVIRONMENTAL SAFETY

Respecting and protecting the environment is important to the long-term success of any materials distribution business. Beacon conducts operations in compliance with applicable laws and regulations while seeking to minimize energy use, emissions, the fleet's carbon footprint, and landfilling through employee training and engagement as well as well-developed partnerships with suppliers and customers. Employees at all levels are required to comply with Beacon's procedures and all relevant local, state, and federal environmental laws and regulations.

## VIOLENCE PREVENTION IN THE WORKPLACE

Beacon is committed to providing a safe and violence-free workplace. In this regard, employees, consultants, customers, visitors, or anyone else on Company premises or engaging in Company-related activity are prohibited from behaving in a violent or threatening manner. Moreover, as part of this policy, Beacon seeks to prevent workplace violence before it begins and pledges to respond to behaviors that may suggest a propensity toward violence even before any violent behavior occurs.

## DRUG AND ALCOHOL-FREE WORKPLACE

Beacon is committed to a substance-free workplace. Employees who use illegal drugs or abuse other controlled substances or alcohol, on or off duty, may cause, among other things, risk to the business, as well as to the safety of employees, customers, and the public, and may increase costs and create delays in completing tasks. Accordingly, Beacon will not tolerate any use of illegal drugs or alcohol or controlled substance abuse by its employees. Employees are subject to drug and alcohol testing in accordance with the Beacon Drug and Alcohol-Free Workplace policy incorporated in the Employee Handbook.



*Beacon believes incidents can be avoided by engaging employees and others in addressing workplace hazards and risky behaviors before they occur.*

3

## DO THE RIGHT THING

Every day, we have a choice to do it the easy way or the right way – we choose to do it the right way every time.

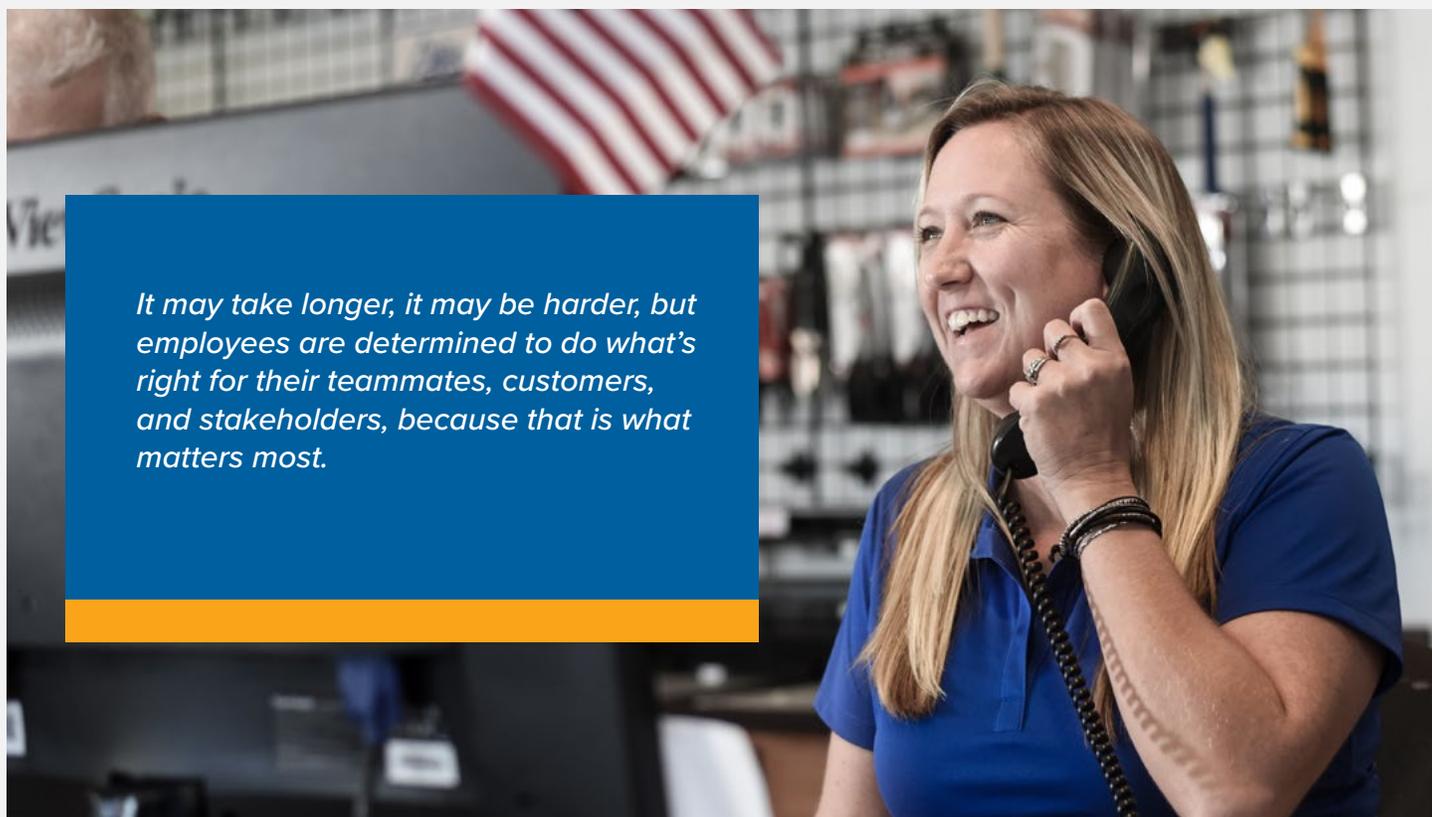


**VALUE THREE: DO THE RIGHT THING**

Employees are prohibited from using corporate property, information, or position for personal gain and competing with the Company. Employees owe a duty to the Company to advance the Company's legitimate interests when an opportunity with competing interests arises. Directors, officers, and employees must avoid even the appearance of a conflict of interest and should raise ethical questions, concerns, or suggestions with appropriate individuals within the Company or to appropriate authorities when they arise.

## **LAWS, RULES, AND REGULATIONS**

Obeying the law, both in letter and in spirit, is the foundation on which Beacon's ethical standards are built. It is the personal responsibility of each director, officer, and employee to respect and obey the federal laws, rules, and regulations, as well as those of the cities, states, and countries in which Beacon operates. Employees who have any questions or concerns about the legality of an action must follow the procedures for reporting their concerns.



*It may take longer, it may be harder, but employees are determined to do what's right for their teammates, customers, and stakeholders, because that is what matters most.*

## CONFLICTS OF INTEREST

Directors, officers, and employees shall perform their duties in an honest and ethical manner and avoid conflicts of interest or the appearance of impropriety. A conflict of interest occurs when an individual's private interest (or the interest of a member of their family) interferes, or even appears to interfere, with the interests of the Company as a whole and may make it difficult for the individual to perform their work for the Company objectively and effectively. Conflicts of interest also arise when an employee, officer, or director (or a member of their family) receives improper personal benefits because of their position in the Company.

Conflicts of interest should be avoided unless specifically authorized. This includes:

- (a) avoiding situations in which **personal, family, and financial interests** conflict with those of the Company;
- (b) refraining from **accepting outside employment** with a competitor, vendor, supplier, or any outside employer, which conflicts with the interests of the Company or its performance and is not consistent with the Outside Employment provisions of the Employee Handbook;
- (c) refraining from **undisclosed romantic relationships** between managers and their direct reports or subordinates that violate the Employee Handbook, or any romantic relationships between employees which conflict with the Company's values, work environment, or productivity;
- (d) prohibiting loans or guarantees by the Company to employees or their family members which constitute **improper personal benefits to the recipients**;
- (e) prohibiting **loans or guarantees by the Company** to any director or executive officer or their family members;
- (f) refraining from serving on a Board of Directors of a for profit business without advance approval of the General Counsel;
- (g) refraining from allowing personal investments to influence, or appear to influence, independent judgment when making business decisions on behalf of the Company.

Whether or not a conflict of interest exists or will exist can be unclear. Persons other than directors and executive officers who have questions about a potential conflict of interest or who become aware of an actual or potential conflict should seek a determination and prior authorization or approval from their supervisor or the General Counsel. A supervisor may not authorize or approve conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first providing the General Counsel's office with a written description of the activity and seeking written approval. If the supervisor is also involved in the potential or actual conflict, the matter should instead be discussed directly with the General Counsel. Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Audit Committee.

## CONFLICTS OF INTEREST SCENARIOS



Q: One of our customers, a roofing contractor, said he would do some work for free at my house. Is this ok?



A: **NO.** This is a conflict of interest because the customer could be doing you a favor to try to gain an advantage or receive a benefit from Beacon in return. You can use a customer's services, but you must pay an equivalent price that is offered to the public.

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Q: My daughter is looking for internship opportunities this summer. I'm a hiring manager and would like her to work in my department to learn the business. Is this a conflict?



A: **YES.** Family members are not permitted to have any type of reporting relationship to each other. However, Beacon welcomes interns and may be able to find an opportunity for her in another department and/or with another manager. Employees can contact Human Resources to learn about available internship opportunities.

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Q: I'm in a serious personal relationship with a person who works for one of our suppliers. Do I need to disclose this?



A: **YES.** The relationship should be disclosed so Beacon can ensure that proprietary information is not exchanged and no competitive advantage is given or received.

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Q: My spouse was just offered a sales job with one of Beacon's competitors in the same market where I am an Assistant Branch Manager. Do I need to disclose this information to Beacon?



A: **YES.** Any family relationship with a person who works for a competitor must be disclosed.

## GIFTS OR ACCEPTANCE OF ITEMS OF VALUE

Beacon recognizes that it is customary for some of its vendors, customers, and other business associates to occasionally give gifts in appreciation of those with whom they do business. It is important, however, that any gift be of modest value and not affect an employee's business judgment or give the appearance that their judgment may be affected. Employees must inform their supervisors whenever they receive a gift from someone outside of the Company in the course of business. Employees and immediate family may not solicit gifts, and may not accept any cash, gifts, services, perks, entertainment, discounts, or other items that are more than modest in value from any customer, supplier, or other entity doing business or seeking business with the Company.

Employees who receive a gift that may not be appropriate under these guidelines but is impractical or offensive to refuse may accept the gift and then promptly report it to their manager. Employees should talk to their manager when in doubt as to whether a gift is appropriate.

Beacon also prohibits employees from giving gifts to customers, vendors, or anyone that would violate the Code's anti-bribery and anti-kickbacks provision. Under the Foreign Corrupt Practices Act (FCPA), it is unlawful to offer, pay, or promise to pay money or anything of value to any foreign official for the purpose of obtaining or retaining business.



### GOOD EXAMPLE

**Q:** A vendor says they will give the Branch Manager tickets to a major league baseball game every time they send an order to the vendor. Is this acceptable?

**A:** **No.** The Branch Manager may not accept the tickets or any other form of payment or inducement for placing an order with the vendor.

## ANTI-BRIBERY AND ANTI-KICKBACKS

Commission rates or fees paid to dealers, distributors, agents, finders, or consultants must be reasonable in relation to the value of the product or work being done, and suppliers must win Beacon's business based on product or service suitability, price, delivery, and quality. Payments and purchasing agreements should be documented and clearly identify the services or products provided, the basis for earning payment, and the applicable rate or fee.

A "bribe" is giving anything of value that would improperly influence or appear to improperly influence the outcome of a transaction. "Anything of value" is very broadly defined and can include such things as: cash, gifts, meals, entertainment, travel and lodging, personal services, charitable donations, business opportunities, favors, and offers of employment. Commercial bribery involves a situation where something of value is given to a current or prospective business partner with the intent to improperly obtain business or influence a business decision. Kickbacks are agreements to return a sum of money to another party in exchange for making or arranging a business transaction. Beacon's policies strictly prohibit any payments that may be considered bribes or kickbacks.

## FAIR COMPETITION AND ANTITRUST

The Company and all directors, officers, and employees are required to comply with the antitrust and unfair competition laws of the countries in which Beacon operates, including the U.S. Foreign Corrupt Practices Act (FCPA), which applies to Beacon's global business. These laws are complex and vary considerably from country to country. They generally concern:

- (a) agreements with competitors, third parties, or agents that harm customers, including price fixing and allocations of customers or contracts;
- (b) agreements that unduly limit a customer's ability to sell a product; and
- (c) attempts to monopolize, including pricing a product below cost to eliminate competition.

No director, officer, or employee may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other unfair dealing practice. Employees who question whether an action may violate competition laws should either follow the process outlined in the Reporting and Enforcement section of this Code or contact the General Counsel.

## FULL, FAIR, ACCURATE, TIMELY, AND UNDERSTANDABLE DISCLOSURES

The Company is committed to ensuring that all disclosures in reports and documents that the Company files with or submits to the SEC, as well as other public communications made by the Company are full, fair, accurate, timely, and understandable. The Company's Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer, and ("Senior Officers") are ultimately responsible for taking all necessary steps to ensure compliance. All directors, officers, and employees shall take appropriate steps within their area of responsibility to ensure the same.



## OUTSIDE EMPLOYMENT

Employees may not work for or receive payments for services from any competitor, customer, distributor, or supplier of the Company without approval of a local or executive leader. Any outside activity must be strictly separated from the Company employment and should not harm job performance at the Company. Skills that are learned and used at the Company should not be used in such a way that would hurt the business or Company. Beacon does not object to employees who decide to seek employment outside of their regular working hours as long as it does not interfere with employee performance or attendance with Beacon, and the employer is not a vendor, client, or competitor so as to create a conflict of interest in employment. All employees engaged in outside employment must immediately inform their supervisors in writing. Failure to disclose or misrepresent outside employment may result in disciplinary action, up to and including termination.

## INSIDER TRADING

Directors, officers, and employees who have access to material non-public information with respect to the Company are not permitted to use or share that information to purchase or sell the Company's or any other company's securities, or for any other purpose except the conduct of the Company's business. All material non-public information about the Company should be considered confidential information. To use confidential information for personal financial benefit or to "tip" others who might make an investment decision based on this information is not only unethical but also illegal. To assist with compliance with laws against insider trading, the Company has adopted a specific policy governing trading by directors, officers, and employees in securities of the Company. The policy is distributed to every director and officer, and any employee who has access to material non-public information. If any director, officer, or employee has any questions regarding their responsibility to avoid insider trading, they should consult Frank Lonegro, the Chief Financial Officer.

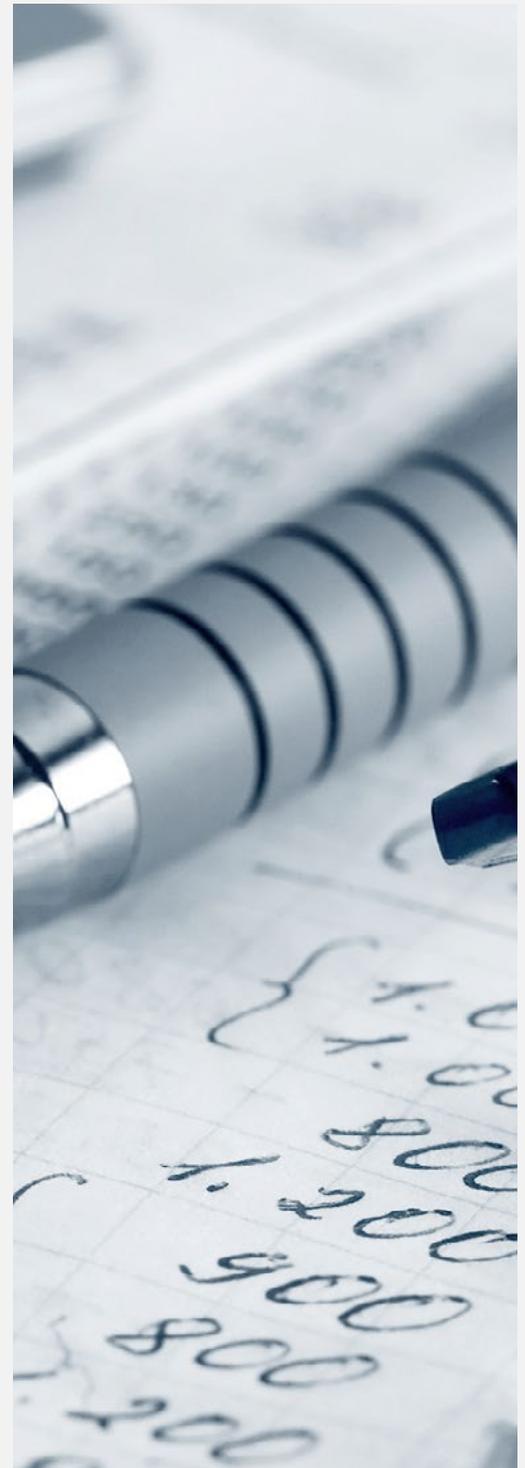
## COMPETITIVE AND CONFIDENTIAL INFORMATION

Competitive information is a valuable tool that allows Beacon to understand and manage its markets, products, and services to better meet customers' needs. However, competitive information must be gathered and used ethically and in accordance with the law. Any information that has been obtained improperly must not be used and notice of its use should be provided to the General Counsel.

Beacon respects the confidentiality of its suppliers' and customers' information. Proprietary or confidential information belonging to another company shall not be used regardless of how it was obtained unless the owner provides the material for a specific purpose and confidentiality has been waived (as determined by the General Counsel) or the material has become public information.

Before disclosing Beacon's technical know-how and data, trade secrets, business plans, marketing and sales programs, and sales figures, as well as information relating to mergers and acquisitions, divestitures, licensing activities, and changes in senior management to any third party, Beacon may require that the third-party execute a non-disclosure agreement. An employee's obligation to preserve Beacon's or another company's confidential information continues even after employment ends.

Confidential information also includes personal information about Beacon's employees and information contained in a personnel file, which may not be shared with others outside the Company except pursuant to approved business relationships or in accordance with law.



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## OWN YOUR DAY

We take pride in a job well done and are always willing to roll up our sleeves and put in the extra effort to overcome obstacles and get results.

Every member of the Beacon team has direct impact on the Company's legacy and feels personally accountable for Beacon's reputation and financial success.

## DATA PRIVACY AND PROTECTING COMPANY ASSETS

Every employee has a duty to safeguard Company assets to maintain Beacon's competitive advantage in the marketplace and to maintain the privacy of personnel, customers, and vendors. All Company assets must be protected from loss, theft, damage, and inappropriate use.

Company assets can include physical assets such as inventory, equipment, and supplies; or technology assets such as data, computer hardware or software, and information systems. Financial assets include cash, securities, and credit cards, while intellectual property includes trademarks or product information, business and marketing plans, financial information, customer lists, and pricing strategies.

Confidential information and non-public information belonging to Beacon's customers and personnel and entrusted to Beacon is also considered a Company asset and must be protected from disclosure to competitors and the public. Confidential information includes personally identifiable information pertaining to Beacon employees, customers, or other individuals (including, for example, names, addresses, telephone numbers and social security numbers), and similar types of information which if disclosed could be harmful to individuals and have a direct impact on the Company's profitability and reputation. Employees' notebooks, cell phones, and laptop computers must be securely locked and always stored to prevent loss, damage, misuse, or theft of confidential information. Any suspected incident of loss or theft of Company assets immediately should be reported to a supervisor and, if necessary, to local law enforcement for investigation.

Beacon may contribute assets in the form of employee time, in kind donations of products and services, or cash donations to 501(c)(3) organizations at the corporate and local levels. These donations must be permissible under corporate compliance rules and should be made with approval of the correct Beacon authority; all donations require that you obtain receipts for purposes of our tax and corporate records.



## GOOD EXAMPLE OF PROTECTING COMPANY ASSETS



Q: My work bag was stolen from my car while I was on a sales call. There may have been customer and pricing lists included in the information stolen. Do I need to report the theft to my manager?

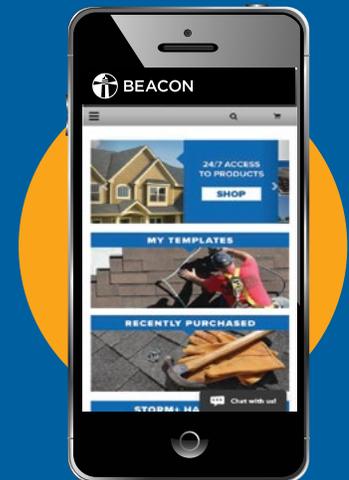


A: **YES.** In addition to reporting to the police, you must immediately report to your manager that there may be a potential loss of confidential information.

Any loss or suspected loss of company assets or sensitive personal information pertaining to Beacon employees, customers, or other individuals must be reported including:

- Social Security Numbers
- Customer or supplier lists
- Pricing lists
- Inventory
- Equipment, including computer hardware and software
- Trademarks or product information
- Financial information
- Pricing strategies
- Or other personally identifiable information

*Any suspected incident of loss or theft of Company assets immediately should be reported to a supervisor and, if necessary, to local law enforcement for investigation*



## ACCURACY OF COMPANY RECORDS

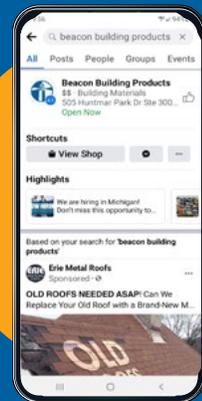
Beacon places an emphasis on meticulous and correct record keeping. Records and reports must be accurate, and information disseminated must be truthful to ensure responsible business decision making and compliance with law. This includes such data as quality, safety, and personnel records, as well as all financial records. All financial statements and other financial information must accurately reflect transactions and events, and comply with federal securities law and SEC rules, required accounting principles, and the Company's system of internal controls.

Each director, officer, and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must be familiar with the Company's disclosure controls and procedures and take all necessary steps to ensure that all filings and public communications about the financial and business condition of the Company are full, fair, accurate, timely, and understandable disclosures.

## USE OF SOCIAL MEDIA

Approval by the Marketing Department is mandatory to create or use a Beacon account in any social media site, and only those who are authorized may do so. Directors, officers, and employees must use all social media responsibly. In all personal online communications, employees must be clear that they are speaking for themselves and never for the Company, which if not clear could affect the perception of Beacon. Employees must consider that what they write will be public and possibly remain online forever. Engaging in harassing, dishonest, or inappropriate behavior online or committing any other violations of this Code, Beacon policies, or the law through social media channels is prohibited and may result in discipline up to and including termination.

*Beacon employees must submit accurate records for their time, paid-time off, expense reports, safety inspections, customer invoicing, and financial statements; as well as any other official documents as required by their position.*



## PERSONAL POLITICAL ACTIVITIES

Beacon encourages personal participation in the political process in a manner consistent with all relevant laws and Company guidelines. Directors, officers, and employees may support the political process through personal contributions or by volunteering personal time to the candidates or organizations of their choice but may not make or commit to political contributions on behalf of Beacon. These activities, however, must not be conducted on Company time or involve the use of any Company resources such as telephones, computers, or supplies. Expressions of personal political views in a public forum (such as letters to the newspaper), must not be made by using Company email or letterhead, or by referring to a Beacon address or title. The Company will not reimburse employees for personal political activity. The use of Company's reputation or assets, including work time, to further an individual's own political activities or interests is strictly prohibited.



In addition, anyone seeking or accepting a public office, must obtain prior approval from the General Counsel.

## COMPANY POLITICAL ACTIVITIES

All political contributions by the Company must be made in accordance with local law. Additionally, lobbying activities or government contacts on behalf of the Company, other than sales activities, should be coordinated with the General Counsel.



## INQUIRIES FOR INFORMATION

Beacon strives to respond in a transparent manner to all inquiries from the government, the financial community, or the media regarding its business operations. Employees must contact the General Counsel or a member of the Company’s Executive Management Team, if requested to be interviewed or to provide documents. Financial inquiries will be referred specifically to the Chief Financial Officer at 571-323-3940.

This policy does not prohibit employees from discussing their wages, benefits, and terms and conditions of employment with others, or exercising their rights under the National Labor Relations Act. This policy does not limit employees’ ability to, in good faith, report possible violations of law or regulations to, or file a charge or complaint with, the SEC, the Equal Employment Opportunity Commission, the Department of Justice, the Congress, any Inspector General, or any other federal, state, or local governmental agency or commission (“Government Agencies”). This policy does not limit employees’ ability to communicate in good faith with any Government Agencies or otherwise participate in any investigation or proceeding that may be conducted by any Government Agency, including providing documents or other information, without notice to Beacon.

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## NEVER STOP BUILDING

The path from average to exceptional begins with hard work and we wake up motivated to be a little better today than we were yesterday.

As strategic thinkers, Beacon employees always are looking for a better way, a better solution, or a better approach to accomplish their mission. Beacon is dedicated to bringing its customers innovative, smart, and reliable solutions to help them get more from their day.





## COMMITMENT TO DIVERSITY AND INCLUSION

Beacon is committed to attracting, developing, and maintaining a workforce that is representative of the communities in which its employees live and work and fostering a culture where sharing ideas is encouraged, and all voices can be heard. By creating inclusive workplaces, Beacon builds stronger communities, and helps its employees and customers live healthier, more fulfilling lives. Efforts to develop its diverse, inclusive, and equitable workforce drive positive results for customer satisfaction and financial performance and establish Beacon as a leader and innovator in the building products industry.

*Social and common interest groups form in all workplaces. It is important that groups do not improperly bias people against others. To avoid this risk, employees should:*

- *Learn about each other's cultures and differences to make connections as one Beacon Nation.*
- *Speak up when they see disrespectful treatment or hear disparaging comments. Let others know when something is inappropriate or offensive.*

## TECHNOLOGY USAGE

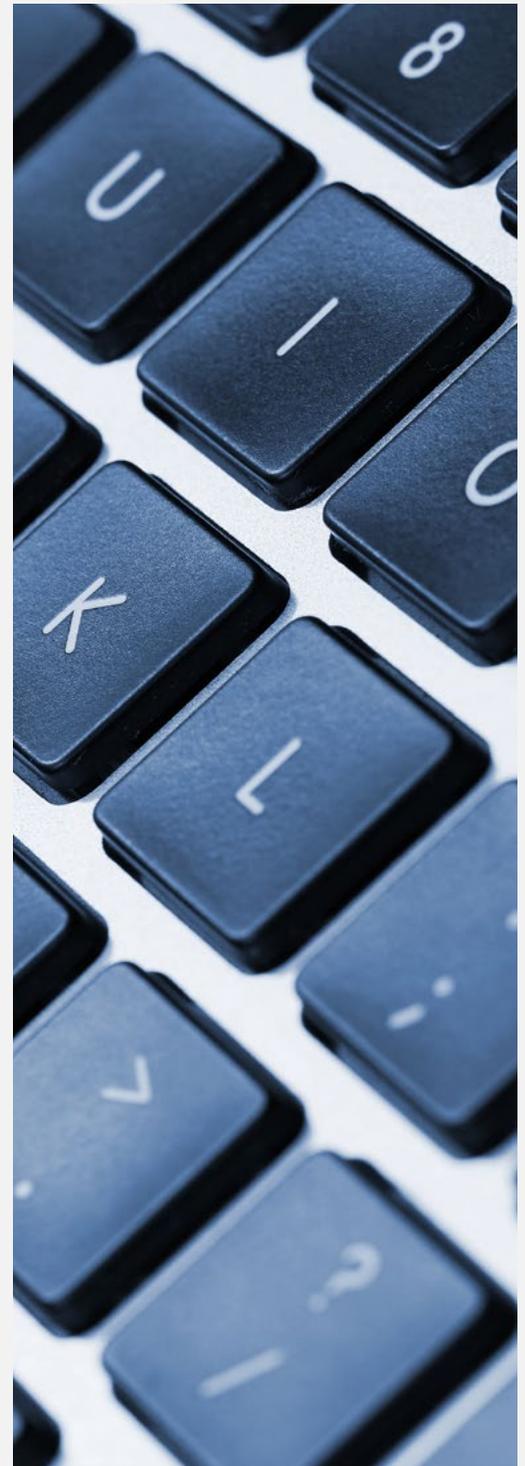
Beacon utilizes technology to innovate its business model and create a more efficient workplace. Employees may have access to increasingly sophisticated technology and electronic communications to perform their jobs. Beacon strives to maintain and implement current policies regarding technology tools. Just as there is a duty to protect the Company's physical assets, employees share an obligation to use Beacon's computer resources, networks, Internet, and email systems responsibly and appropriately and to improve communications and operations.

Employees have no personal privacy right in any e-mail, voice mail, or Internet communications, and Beacon reserves the right to monitor and inspect all such communications and to access, delete, intercept, save, transfer, or forward for inspections or review by others, and to otherwise disclose any communications composed, sent, or received through Beacon's e-mail system, voice mail, or Internet. Use of these systems shall constitute consent to this policy. Technology use rules are incorporated in Beacon's Computer, Email, Internet, Telephone, and Fax Usage Policy in the Employee Handbook.

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## DOING BUSINESS WITH OTHERS

Beacon maintains a high standard for those with whom it will interact and will not do business with those companies or third parties who violate the law or are likely to harm the Company's reputation. All arrangements with third parties including subcontractors must comply with the law and be consistent with the Code.





*All products shipped or delivered shall live up to high quality Company standards.*

## PRODUCT QUALITY AND SAFETY

To maintain the Company's valuable reputation, compliance with the highest quality processes and safety requirements is essential. All products shipped or delivered shall live up to Company standards.

## CUSTOMER SATISFACTION

Beacon employees will build on its customer base through accurate and truthful marketing and advertising efforts and obtain new business legally and ethically. Long-term relationships and lasting partnerships are built through demonstrations of honesty and integrity.

## GOOD EXAMPLE

**Q:** Joe, a driver, notices that a few shingle bundles loaded on the truck and ready for delivery were damaged in the previous night's storm. What should he do?

**A:** Prior to the truck leaving the yard, Joe must work with the team to ensure that all materials to be delivered meet Beacon's high quality standards.

## THIS CODE'S PUBLICATION, AMENDMENTS, AND WAIVERS

This Code is posted and maintained on the Company's website and such posting is disclosed in the Company's Annual Report on Form 10-K, by reference to the Company's proxy statement, if permitted by SEC rules. The Company shall make such other disclosure as is required by law.

The Annual Report on Form 10-K, again by reference to the Company's proxy statement, if permitted by SEC rules, will also contain a statement that amendments to and waivers of this Code with respect to Senior Officers will be posted on the Company's website.

While waivers of this code are not anticipated, any amendment to or waiver of this Code with respect to a Senior Officer or director shall require approval of the Board of Directors. In addition, any amendment to or waiver of this Code with respect to a Senior Officer:

- (a) shall be disclosed within four (4) business days of such action on the Company's website for a period of not less than twelve months, and/or in a filing on Form 8-K with the Securities and Exchange Commission;
- (b) shall be reported in the Company's next periodic report with the SEC if not previously reported on a Form 8-K;
- (c) shall be disclosed in any other manner required by the rules of the SEC or the NASDAQ Stock Market and;
- (d) records of any disclosures relating to waivers of this Code shall be retained for no less than five years.

## APPENDIX

### **VALUE ONE: Put People First**

- Equal Opportunity — Employee Handbook
- Harassment — Employee Handbook

### **VALUE TWO: Make Every Day Safer**

- Safe Operations — Safety Handbook (Fall Protection, Hazardous Materials, Hazardous Communications, Load Securement, Driving Policies)
- Health & Safety Training — Safety Handbook Standard Operating Procedures (SOP), Employee Handbook
- Violence Prevention in the Workplace — Employee Handbook
- Drug and Alcohol-Free Workplace — Employee Handbook, DOT Drivers Drug and Alcohol Policy

### **VALUE THREE: Do the Right Thing**

- Conflicts of Interest — Employee Handbook
- Gifts or Acceptance of Items of Value — Employee Handbook
- Anti-Bribery and Anti-Kickbacks — US Foreign Corrupt Practices Act (FCPA)
- Fair Competition and Antitrust — FCPA
- Insider Trading — Statement of Policies and Procedures Insider Trading and Prohibition of Hedging and Pledging Policy

### **VALUE FOUR: Own Your Day**

- Data Privacy and Protecting Company Assets — Employee Handbook
- Accuracy of Company Records — Disclosure Committee Charter, Tax Preparation and Control of ACCT Policies, Financial Reporting and Analysis

### **VALUE FIVE: Never Stop Building**

- Commitment to Diversity and Inclusion — Employee Handbook, Diversity and Inclusion Council Charter
- Technology Usage — Beacon Cyber Security Awareness Phishing Program Guidelines; Computer, Email, Internet, Telephone, and Fax Usage — Employee Handbook