

# GIBRALTAR

## SUPPLIER CODE OF CONDUCT

### Introduction

Gibraltar Industries, Inc. (“Gibraltar”) is here to deliver both human and business impact. We believe that’s the best path for serving our people, our customers, and our investors. While value drives every company, not all value is created equal. By focusing on areas that matter most: comfortable living, sustainable power, and productive growing, we are creating a more meaningful impact on the world and people’s lives.

To further Gibraltar’s impact, we maintain a steadfast commitment to high ethical standards and business conduct which extends directly to our supply chain.

The supply chain of Gibraltar must adhere to the Expectations for Suppliers/Vendors included in our Code of Ethics & Statement of Policy located on Gibraltar’s website, <https://ir.gibraltar1.com/corporate-governance>. Gibraltar expects compliance with ethical, labor, health, safety, environmental, quality, employee, and management responsibilities and standards set forth in this document. If failure to comply is detected from a supplier, Gibraltar may request a corrective action plan from the supplier to allow for future compliance. In the instance where a supplier does not complete a corrective action plan, Gibraltar may dismiss any and all business/agreements.

Any subcontractors, secondary suppliers, other third parties, and employees in business agreements with the supplier must also comply with the standards presented in this guide, as well as the Gibraltar Code of Ethics and Statement Policy.

### 1. Business Conduct and Ethics

Gibraltar expects suppliers to follow the standards set forth in Gibraltar’s Code of Ethics and Statement Policy, Gibraltar’s Conflict Minerals Policy and all other applicable corporate governance documents (Available under the Gibraltar Corporate Governance page of Gibraltar’s website at [www.gibraltar1.com/corporate-governance](http://www.gibraltar1.com/corporate-governance). This includes, but is not limited to, the protection of Gibraltar’s intellectual property / confidential and proprietary information, compliance with the US Foreign Corrupt Practices Act (FCPA), and other illegal or improper payments.

### 2. Compliance with Applicable Laws

Suppliers must fully comply with legislation or regulation that is applicable, due to location, involvement in any international agreements, or any other forms or judicial boundaries, in effect now or as hereafter amended. This includes proper product reporting and/or labeling, including, but not limited to, The Conflict Minerals Policy and CA Prop 65 requirements.

### 3. Human Rights

Suppliers are expected to respect the rights of employees and adhere to laws specified in the Section entitled “*Compliance with Applicable Laws*” above, The United Nations International Human Rights Law, as well as the Universal Declaration of Human Rights. Suppliers will adhere to the standards of the previously stated documents regarding, but not limited to, wages, benefits, collective bargaining, and working conditions.

Gibraltar does **not** tolerate any forms of child labor, slavery, human trafficking, or any other related acts of forced labor or servitude. Gibraltar includes the deprivation of education due to employment, working conditions equal to slavery or similar practices, and illicit occupations to be a direct violation of our policy. Any supplier engaging in human rights violations as previously described in this section will have all business arrangements **nullified immediately** and the supplier will be reported to the local law enforcements. Suppliers must adhere to the International Labor Organizations (ILO) core labor standards as well as the United Nations Global Compact Principles. Gibraltar includes any forms of involuntary work done, including by inmate workforces, to be unacceptable as well.

### 4. Fair Treatment, Diversity, and Inclusion of Employees

Gibraltar expects suppliers to provide their workforce an environment free from all forms of inhumane treatment, sexual harassment, abuse, and corporal punishment. All employees must be treated equally and humanely, with no intent or signs of discrimination.

### 5. Material/Product Quality

The material components of products must be provided by the supplier to the specific quality specified by Gibraltar and comply with conduct agreements made in Gibraltar’s Terms and Conditions.

### 6. Environmental Responsibility and Consciousness

Suppliers are expected to follow applicable laws and regulations and maintain total compliance throughout the duration of business conduct with Gibraltar. We recommend that suppliers voluntarily have in place environmental policies to reduce risks of environmental destruction, if already not required under law. Gibraltar asks suppliers to monitor emissions to air, water, and soil and recommend recording the emissions and having monitoring and recording policies in place. Gibraltar also recommends that suppliers recycle, reuse and repurpose end of life materials and products in safe methods that adhere to any applicable occupational health and safety, and environmental laws or regulation.

### 7. Health and Safety of Employees

Suppliers must adhere to the International Labor Organizations (ILO) core labor standards as well as the United Nations Global Compact Principles. Suppliers must follow all applicable laws and regulations for the health and safety of employees and contractors working for the supplier.

Safety information, including but not limited to material hazard sheets, must be provided to the all employees of the supplier who may be exposed to potentially unsafe/unhealthy materials, products or practices.

If applicable, suppliers will provide proper personal protective equipment (PPE) to employees for ensuring safe working conditions. Proper company policies and preventative measures must also be in place for the protection of employees in adverse circumstances and follow applicable standards or laws. Employees must have access to potable water and sanitation stations while working and on supplier property. If applicable, adequate living quarters must also be provided.

## **8. Management**

Gibraltar reserves the right to follow up with suppliers via a survey or other communication methodologies, or to inspect the areas of facilities involved in the manufacture, distribution or transport of the material components of products, to certify compliance with the standards stated in this code of conduct. Gibraltar also reserves the right to screen new suppliers for all the requirements listed in this Supplier Code of Conduct and the Gibraltar Code of Ethics and Statement Policy.

## **9. Agreement**

This Supplier Code of Conduct will be followed by suppliers wishing to do business with Gibraltar. Therefore, any supplier entering or continuing business with Gibraltar will uphold all expectations referenced in this document.