

CODE OF CONDUCT

POLNDECK



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The Polydeck Code of Conduct stands as a testament to our unwavering commitment to upholding the highest standards of ethical conduct, transparency, and accountability in our operations.

Our Code of Conduct is not merely a document. It is a tool that guides our collective pursuit towards our organizational objectives and aids in fostering a culture built on our core values of integrity, humility, excellence, and care. By adhering to this Code, we are deeply committed to nurturing and sustaining our corporate vision to serve our customers and stakeholders with excellence, so that we can achieve profitable growth, with enables us to create eternal value by conducting our business and caring for people in a way that honors God.

We are committed to delivering extraordinary products, services, and experiences to our customers, while respecting the rights of our dedicated employees, fostering good practices among our suppliers, advocating free competition, and upholding our responsibility towards preserving our environment to ensure we leave a better tomorrow for future generations.

Every member of the Polydeck family, including ourselves, is entrusted with the task of ensuring the guidelines articulated in this Code are effectively adhered to. Our collective adherence will maintain and enhance the elevated level of professionalism and integrity we exhibit, both internally and in our interactions with suppliers, customers, public authorities, and the broader society.

We urge each of you to take ownership of this Code, to let it be the beacon that guides your actions and decisions. Regardless of your role within Polydeck, the Code of Conduct applies to us all, serving as a reference document that inspires our decisions and navigates our daily actions.

Together, let's keep building upon the solid foundation of ethical principles that define who we are and what we represent.

Peter Freissle, CEO

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Ronald D. Kuehl II, President

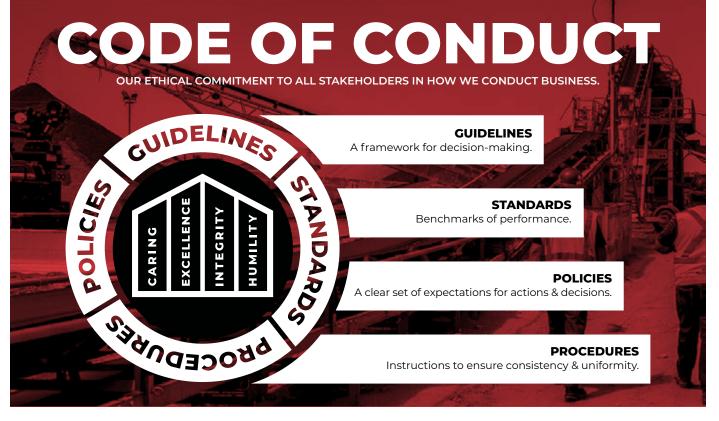


The Polydeck Code of Conduct sets forth the behavioral standards we expect from all Polydeck employees, officers, and directors. Moreover, it extends these expectations to our business partners, vendors, and contractors when they work in tandem with us or act on our behalf.

Central to our Code are the core values that drive every aspect of our business. It champions key themes, emphasizing safety, diversity, environmental responsibility, anti-corruption, and a steadfast dedication to professional ethics.

For us, it's essential that our team members have clear avenues to report any breaches or potential violations. To that end, our Code provides comprehensive guidance on how to report such concerns. We want to assure all employees that using these designated channels will not expose them to any form of retaliation. Our promise is to take each report seriously, and non-compliance with our Code will be met with rigorous enforcement procedures, aligned with our internal policies, core values, and the prevailing labor legislation.

In essence, Polydeck's Code of Conduct is more than guidelines on paper—it's our pledge to uphold a standard of excellence, ensuring a workplace where everyone is treated with respect, and where our actions reflect the highest degree of professional ethics.



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1. We Promote Ethical Conduct: As a Polydeck team, we are committed to maintaining the highest standards of ethical conduct in all our professional endeavors. We adhere strictly to laws and regulations and act with honesty, integrity, and fairness in all our dealings. Additionally, we are committed to providing a safe work environment and will not, under any circumstance, ask employees, strategic partners, or customers to place themselves in harms way.

2. We Advocate for Transparency: Open, honest, and timely communication is our standard. We understand the importance of transparency in our interactions, fostering a culture of trust and credibility among employees, stakeholders, and customers.

3. We Safeguard Confidential Information: We are stewardsof proprietary, confidential, and sensitive information. We manage this data responsibly and refrain from unauthorized disclosure, ensuring it is used solely for legitimate business purposes.

4. We Uphold the Law: We are committed to full compliance with all applicable laws, regulations, and standards in every location where we operate. It is our responsibility to be knowledgeable about the legal requirements applicable to our specific roles.

5. We Respect Human Rights: We stand firm in our commitment to respect and promote all people. Our actions, decisions, and policies are geared toward the prevention of any form of human rights abuse or discrimination.

6. We Foster a Respectful and Caring Culture: We value each other's perspectives and contributions, fostering a culture of humility and care. Disrespect, hate, and unprofessional behavior have no place in our organization.

7. We Ensure Equal Opportunity: We uphold fairness in all employment decisions. From hiring to promotion, our practices are free from discrimination based on race, religion, sex, age, disability, or any other protected status.







8. We Encourage Collaboration: We emphasize teamwork and cooperation, knowing it leads to innovation and success. We promote a respectful, harassment-free work environment where everyone feels safe and valued.

9. We Adhere to Operational Standards: We follow established standards for operations and resource development. This dedication helps us deliver value to stakeholders and honor our commitments to corporate responsibility.

10. We Practice Honesty in the Marketplace:

We uphold financial integrity and transparency in all our dealings. This extends from our quoting process and stakeholder relationships to anticorruption measures, gift exchanges, political contributions, and supplier selection procedures.

11. We Safeguard Polydeck's Reputation:

We understand that our actions reflect on the company. We strive to uphold Polydeck's good name, ensuring that our behavior, both at and away from the workplace, aligns with our company's values.





12. We Support and Protect Whistleblowers: We provide a safe environment for employees to voice concerns. Any employee raising ethical or legal issues will not face retaliation and will be protected and supported, and the accused will be treated as innocent until proven guilty.

13. We Adhere to Governance Principles: We follow our internal governance and compliance program, which forms the foundation of our work and directs our actions.

14. We Commit to Sustainability: We adhere to principles of sustainable development, balancing our economic goals with social responsibility and environmental stewardship. We understand our actions have far-reaching effects and strive to minimize our environmental footprint.

15. We Provide Essential Resources and Contacts:

We ensure that our team members have access to critical resources, contacts, and support systems. From compliance managers to caring advocates, we make sure that assistance and guidance are always within reach. Confidential whistleblower Hotline is:

polydeck.com/hotline North America #: 1-800-921-2240 South America #: 800-835-133



The Code of Conduct, as well as any Policy, Standard, Procedure, Guideline, or other similar statement, whether written or verbal, should not be construed as an employment contract or other legally binding agreement between Polydeck and any employee or any other person or entity. Likewise, no person or entity may assert themselves as a third-party beneficiary of this Code or any Policy, Standard, Procedure, Guideline, or other similar statement, whether written or verbal.

Unless specifically outlined in a collective bargaining agreement or an individual employment contract, or otherwise inconsistent with applicable local law, employment at Polydeck is at will. This implies that either the employee or Polydeck can terminate the employment relationship at any given time, with or without reason, justification, or prior explanation. The at-will status of any Polydeck employee's employment can only be altered by a contractual agreement, signed in writing by both the employee and either the Vice President of Employee Care, President, or Chief Executive Officer. Moreover, unless expressly covered by a collective bargaining agreement or a specific employment contract or local law, no verbal or written statement by Polydeck (or any employee or officer thereof) guarantees any specific terms, conditions, or duration of employment; instead, any terms, conditions, or duration of an employee's relationship with the company may be adjusted or terminated at any time at the sole discretion of the company.

As a representative of Polydeck, I affirmatively acknowledge that I have received, thoroughly read, and fully understand the Code of Conduct. I agree to uphold and adhere to the standards, principles, and responsibilities outlined therein, to foster a culture of respect, integrity, and ethical behavior within the organization.

WAIVER CLAUSE

This Code of Conduct stands as a critical guide for appropriate behavior within Polydeck and cannot be waived without suitable authorization. If you encounter a situation that you believe may necessitate a waiver of a particular provision of the Code, promptly address the issue with your immediate manager, department Director or Vice President or the Caring Manager. A waiver request will be presented to the Compliance Team and reviewed in conjunction with the President and Chief Executive Officer.

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