

American Woodmark Corporation

Supplier Code of Conduct

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Purpose

Core to American Woodmark's culture is integrity. Our culture is supported by values of dignity and respect, caring and candor and accountability and responsibility, and through compliance with all applicable laws and regulations. American Woodmark expects the same level of commitment and highest level of integrity from our business partners. Non-compliance or failure by any supplier or business partner to comply with American Woodmark's Human Rights Policy or our Supplier Code of Conduct is cause for termination of our contracts or other agreements without liability, damages, or recourse.

Overview

- Involuntary labor of any kind is prohibited. Supplier will not use any forced or involuntary labor.
- Child labor is prohibited. "Child" means a person younger than 15 (or 14 where local law allows). Suppliers employing young persons that do not fall within the definition of "child" will also comply with any laws and regulations applicable to such persons.
- Human trafficking and slavery are prohibited.
- Supplier will treat each employee with dignity and respect and will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological, or verbal harassment or abuse.
- Supplier will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination, or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion, or disability.
- Supplier will respect the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty.
- Supplier will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations, ensuring at a minimum, reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation. Supplier will likewise ensure that the same standards of health and safety are applied in any housing that they provide for employees.
- Supplier will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation and provide legally mandated benefits. Supplier will compensate employees for overtime hours at such premium rate as is legally required or, if there is no legally prescribed premium rate, at a rate at least equal to the regular hourly compensation rate. In compliance with local laws, the supplier will allow reasonable time for employees to get adequate rest.
- Supplier will comply with all applicable laws and regulations, including those pertaining to the manufacture, pricing, sale and distribution of merchandise and environmental laws and regulations. All references to "applicable laws and regulations" in this Code of Conduct include local and national codes, rules, and regulations as well as applicable treaties and voluntary industry standards.
- Supplier will not use subcontractors for the provision of goods or services to the Company unless the subcontractor has entered a written commitment with the Supplier to comply with this Code of Conduct.

- Supplier hereby authorizes AWC to confirm compliance by Supplier with this Code of Conduct, including unannounced onsite inspections of manufacturing facilities and employer provided housing; reviews of Supplier books and records relating to employment matters; and private interviews with employees. Supplier will maintain at its facilities all documentation that may be needed to demonstrate compliance with this Code of Conduct.
- Supplier will take appropriate steps to ensure that the provisions of this Code of Conduct are communicated to employees, including the prominent posting of a copy of this Code of Conduct, in the local language and in a place readily accessible to employees, at all times.

Conflict of Interest

A situation in which a person or organization is involved in multiple interests, financial interest, or otherwise, one of which could possibly impact the motivation of the individual or organization. Under no circumstance will a conflict of interest between an employee of American Woodmark and a supplier be allowed or tolerated. Both the employee and supplier will be terminated.

Gifts and Entertainment Policy

We prefer that suppliers do not provide gifts, entertainment, or services to American Woodmark employees. If gifts are offered, the following guidelines must be followed:

- Meals may be provided if they have a business purpose and are reasonable in cost.
- Gifts should be infrequent and moderate in value.
- Non-business related trips or entertainment should not be offered or accepted.

Cash or loans are strictly prohibited.

Supplier Selection

Suppliers will not be selected solely on price as there are numerous factors considered in such a selection. Several actions will be taken before selecting a supplier including a review to ensure conformance with our Human Rights Policy and this Code of Conduct.

Conflict Minerals

Conflict materials are produced in a conflict zone and sold to perpetuate the fighting. An example conflict zone is the eastern provinces of the Democratic Republic of the Congo where various armies, rebel groups, and outside actors have profited while contributing to violence and exploitation during wars in the region. American Woodmark requires all suppliers to fully comply with the Conflict Materials legislation and no conflict minerals are to be used in any of the goods supplied to us.

Reporting Concerns

American Woodmark employees may report any violations of this Policy or other concerns without fear of retaliation to:

- Your Human Resources Manager
- The Ethics Point hotline
 - Telephone: 1-844-471-7681
 - Website: [Ethics Point](#)

Employees of Business Partners are encouraged to work through their own company to resolve internal ethics issues. Business Partners should, however, promptly report violations of this Policy or any unethical behavior by contacting American Woodmark Ethics Point hotline.