

FREQUENTLY ASKED QUESTIONS

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WHAT IS THE APOGEE CODE OF CONDUCT HOTLINE?

The Apogee Code of Conduct Hotline is a comprehensive and anonymous Internet and telephone-based reporting tool that assists management and employees in working together to address fraud, abuse, misconduct and other violations in the workplace, while helping to cultivate a positive work environment.

The Apogee Code of Conduct Hotline is operated by an outside third-party administrator that is not affiliated with Apogee.

CAN I REMAIN ANONYMOUS?

Yes, you can choose to be anonymous while making a report. When asked, “Do you wish to remain anonymous?” simply click or say “Yes.”

DOES MANAGEMENT REALLY WANT ME TO REPORT?

Yes. In fact, the Company *needs* you to report.

You know what is going on in your company — both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the Company and its employees. Also, offering positive input may help identify issues that can improve our Company’s culture and performance.

WHAT TYPES OF SITUATIONS SHOULD I REPORT?

If you believe someone may be unintentionally or intentionally violating the law, the principles or standards in the Code of Conduct or any applicable Company policy or procedure, or have concerns regarding questionable accounting or auditing practices, report the known or suspected violation or your concerns.

ARE THE APOGEE CODE OF CONDUCT HOTLINE TELEPHONE NUMBERS CONFIDENTIAL AND ANONYMOUS?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report. The interviewer will type your responses into the Apogee Code of Conduct Hotline website. The same security and confidentiality measures are applied to telephonic reports and online reports.

HOW DO I MAKE A REPORT?

In the U.S. and Canada

You may report Code of Conduct violations anonymously by contacting the Apogee Code of Conduct Hotline at www.apog.ethicspoint.com (enter the organization name of “Apogee”) (worldwide), or, from an outside line, by dialing 800.441.6164 (toll-free in the U.S. and Canada).

Employees who wish to make a report in a language other than English should call the Apogee Code of Conduct Hotline at 800.441.6164 and ask for an interpreter.

In Other Countries

From an outside line, dial the AT&T Direct Dial Access® number for your location:

COUNTRY	AT&T DIRECT DIAL ACCESS® NUMBER	LANGUAGE OPTIONS
Brazil (Not from a Cell Phone)	0-800-890-0288	Portuguese (Brazilian), English
Brazil (From a Cell Phone)	0-800-888-8288	
Denmark	800-100-10	Danish, English
Singapore (StarHub)	800-001-0001	Malay, English
Singapore (Sing Tel)	800-011-1111	
United Kingdom (C&W)	0-500-89-0011	English
United Kingdom (British Telecom)	0-800-89-0011	

Wait for a prompt and then dial 800.441.6164. The call will be answered in English. To continue the call in another language, the employee should state the desired language to the operator to request an interpreter. It may take several minutes for an interpreter to come on the line.

International AT&T direct dial access codes are subject to change. If a direct dial access code listed above is not in service, the employee should dial the alternate direct dial access code or go to www.apog.ethicspoint.com (enter the organization name of “Apogee”) for the most current list of access codes.

IF I SEE A VIOLATION, SHOULDN'T I JUST REPORT IT TO MY MANAGER OR HUMAN RESOURCES AND LET THEM DEAL WITH IT?

You certainly can and are encouraged to do so. The Company provides many options to make a report, including contacting your immediate supervisor, a senior manager, the Human Resources Department, Apogee's General Counsel (at 952.487.7514) or a member of Apogee's Corporate Compliance Committee (at 952.835.1874) or the Apogee Code of Conduct Hotline. We encourage you to choose the option that best fits your situation and circumstances.

WHO IS ON THE CORPORATE COMPLIANCE COMMITTEE?

The Corporate Compliance Committee consists of:

- Joe Puishys, Chief Executive Officer and President
- Jim Porter, Chief Financial Officer
- Pat Beithon, General Counsel
- Warren Planitzer, Vice President, Human Resources

You can contact a member of the Corporate Compliance Committee by calling 952.835.1874 or by writing to Apogee's General Counsel at 4400 West 78th Street, Suite 520, Minneapolis, Minnesota 55435.

WHAT IF I AM AFRAID TO MAKE A REPORT BECAUSE OF POTENTIAL RETALIATION?

Make the report. Employees who report known or suspected violations of the law or the Code of Conduct or concerns about accounting or auditing matters in good faith will not be subject to reprisals or other punishment as a consequence of reporting such violation. It is absolutely forbidden for any employee to punish or conduct reprisals against another employee who in good faith has reported violations or questionable accounting or auditing practices.

I AM NOT SURE WHAT I OBSERVED OR HEARD IS A VIOLATION OF COMPANY POLICY, OR IF IT INVOLVED UNETHICAL CONDUCT, BUT IT JUST DOES NOT LOOK OR FEEL RIGHT TO ME. WHAT SHOULD I DO?

You can file a report using the Apogee Code of Conduct Hotline. If you are comfortable, you can make a report to your immediate supervisor, a senior manager, the Human Resources Department, Apogee's General Counsel (at 952.487.7514) or a member of the Apogee Corporate Compliance Committee (at 952.835.1874). Concerns can also be reported on a confidential and anonymous basis to the Apogee Code of Conduct Hotline online at www.apog.ethicspoint.com (enter the organization name of "Apogee") (worldwide) or by phone at 800.441.6164 (toll-free in the U.S. and Canada). Instructions on how to make a toll-free phone call from another country are found on page 3.

The Apogee Code of Conduct Hotline can help you prepare and file your report so it can be properly understood. The Company would rather you reported a situation that turned out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

WHAT IF I REMEMBER SOMETHING IMPORTANT ABOUT THE INCIDENT AFTER I FILE A REPORT? WHAT IF THE COMPANY HAS FURTHER QUESTIONS FOR ME CONCERNING MY REPORT?

When you file a report via the Apogee Code of Conduct Hotline website or by calling the Apogee Code of Conduct Hotline, you receive a unique user name and are asked to create a password. You can return to the Apogee Code of Conduct Hotline system again either by Internet or telephone and you can access your original report to answer questions posed by a Company representative and add further information that will help resolve open issues. The Company strongly suggests that you return to the site in the time specified to answer Company questions. You and the Company have now entered into an "anonymous dialogue" where situations are not only identified, but can be resolved no matter how complex they may be.

DOESN'T MY COMPUTER GENERATE A SERVER LOG SHOWING EVERY WEBSITE MY COMPUTER CONNECTS WITH? WON'T THIS LOG IDENTIFY ME AS A REPORTER?

The Apogee Code of Conduct Hotline does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to the Apogee Code of Conduct Hotline is available.

CAN I FILE A REPORT FROM HOME AND STILL REMAIN ANONYMOUS?

A report made to the Apogee Code of Conduct Hotline from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a history by screen name and the Apogee Code of Conduct Hotline strips away Internet addresses so that anonymity is maintained. The Apogee Code of Conduct Hotline is contractually committed not to pursue a reporter's identity.

WHERE DO THESE REPORTS GO? WHO CAN ACCESS THESE REPORTS?

In order to prevent any possible breach in security, reports made on the Apogee Code of Conduct Hotline are entered directly on the server of the third-party vendor who is not affiliated with the Company. The Apogee Code of Conduct Hotline makes these reports available only to specific individuals within the Company who are charged with evaluating the type of violation and location of the incident. Generally, all reports filed within Apogee are reviewed by Apogee's General Counsel and Vice President, Human Resources. Further involvement by others may include Apogee's Corporate Compliance Committee, the person investigating the matter and/or the Audit Committee of the Apogee Board of Directors and Board of Directors in special circumstances.

WHAT DO I DO IF I HAVE QUESTIONS ABOUT MY RIGHTS UNDER THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (“HIPAA”), SUCH AS PRIVACY OF MY MEDICAL INFORMATION OR INFORMATION ABOUT MY RIGHTS UNDER HIPAA?

If you are looking for Apogee’s HIPAA Privacy Policy, you can go to the Apogee Benefit Center website at www.apogee.essbenefits.com. On the home page, click on “Continue,” which will bring you to the login page. From the login page, click on “Plan Information,” then “HIPAA,” then “HIPAA Notice of Privacy Practices.”

If you have a complaint or concern about your HIPAA rights or the privacy of your medical information, you can make a report by contacting the Apogee Code of Conduct Hotline at www.apog.ethicspoint.com (enter the organization name of “Apogee”) (worldwide), select the “Other” category and identify the report as a HIPAA matter, or call 800.441.6164 (toll-free in the U.S. and Canada). Instructions on how to make a toll-free phone call from another country are found on page 3.

WHEN IN DOUBT

If you are in doubt about a business conduct situation, ask yourself the following questions:

- Is it legal?
- Does it violate Company policy?
- Is it consistent with the Company’s core values?
- Is it fair and just?
- How would it look in a newspaper article?

If you are unsure about what to do, take the initiative to seek information to help you make the right decision.