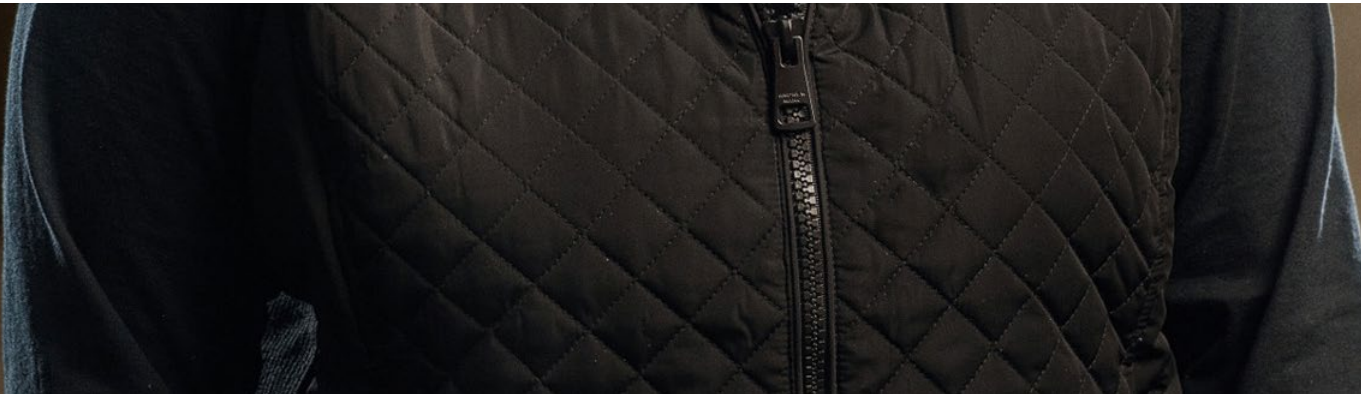
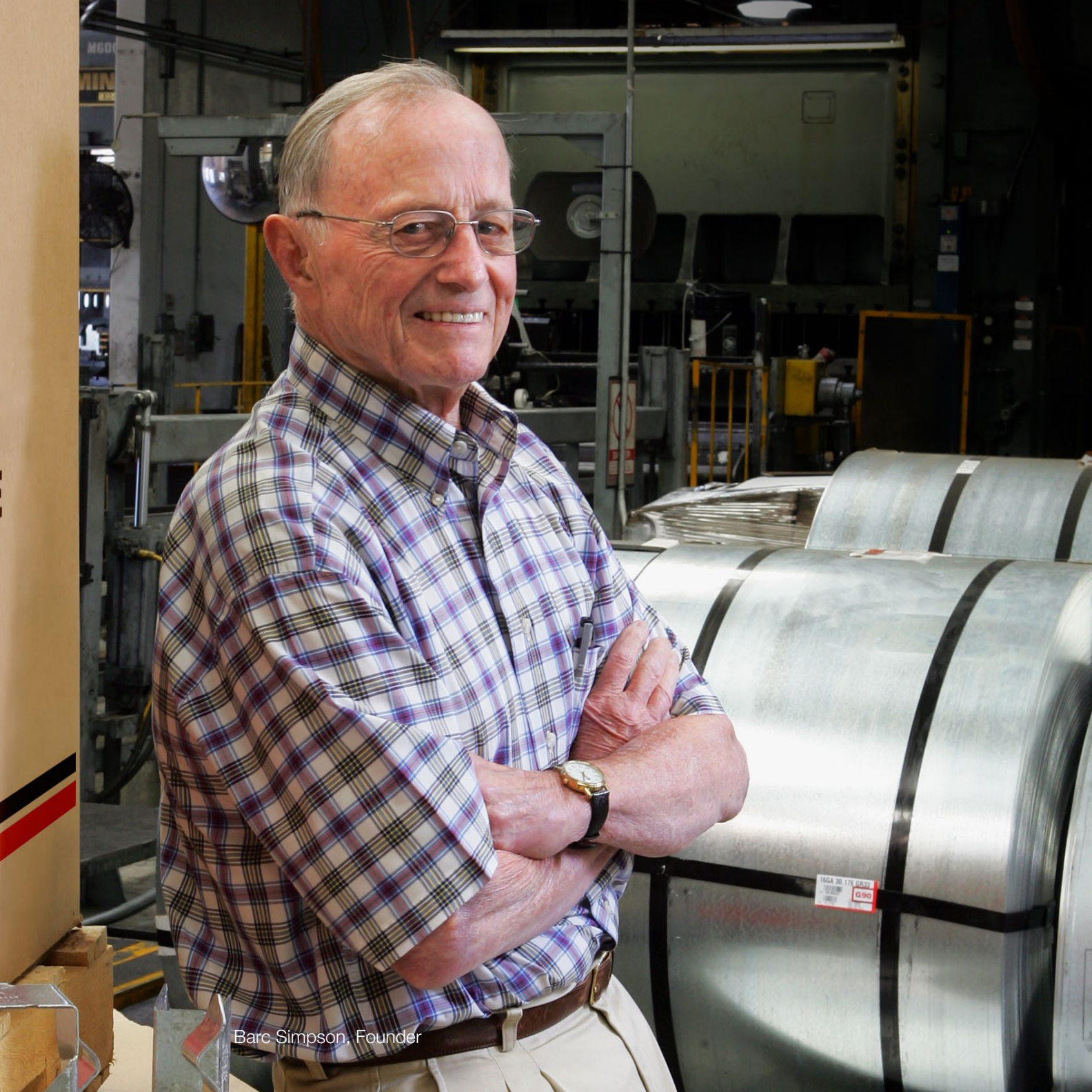




Building on Our Legacy, Living Our Values

Our Code of Business Conduct and Ethics





Barc Simpson, Founder

OUR VALUES START WITH US
OUR VISION AND MISSION
WELCOME TO OUR CODE

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LIVING OUR VALUES

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Our Values Start with Us

Since its beginning in 1956, Simpson Strong-Tie has rooted its business practices in shared values. From Relentless Customer Focus to Everybody Matters and Give Back, our Company Values derive directly from the Nine Principles of Business of our founder, Barc Simpson. These values have helped us earn a reputation for quality, service, integrity and unparalleled performance throughout the industry and our communities. By continuing to follow these values and Barc's example — by listening, keeping our promises and always supporting our customers and each other — we further strengthen our company reputation and Secret Sauce culture and lay the foundation for even greater success.

Our Code of Business Conduct and Ethics, referred to as our Code, is an invaluable resource as it helps define many of the principles and guidelines — such as safety, respect, honesty, accuracy, confidentiality and sustainability — for putting our Values into practice. It also outlines some of the governmental laws and regulations that apply to all of us, whatever our company role.

You should familiarize yourself with the Code and refer to it whenever your job presents you with a question about the right way to proceed. The Code can't address the specifics of every situation, but it will always point you to the policies and people who can guide you.

Every action you take or observe affects our culture. If you ever suspect a violation of our Code or see



conduct inconsistent with our Values, it's your responsibility to Speak Up. Our Code represents our shared commitment to ethical conduct. Let it guide your relationships with your coworkers, our customers and the communities where we live and work.

In the end, everything comes down to people — us and the people we interact with. You honor our company and demonstrate ethical conduct by showing respect for yourself and others in everything you do. Thank you for building on our legacy by living our Values.

Mike Olosky
President and Chief Executive Officer

A handwritten signature in black ink that reads "Mike Olosky". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

OUR VISION

To provide the most trusted construction solutions on jobs worldwide.

OUR MISSION

We provide solutions that help people design and build safer, stronger structures.

OUR VALUES

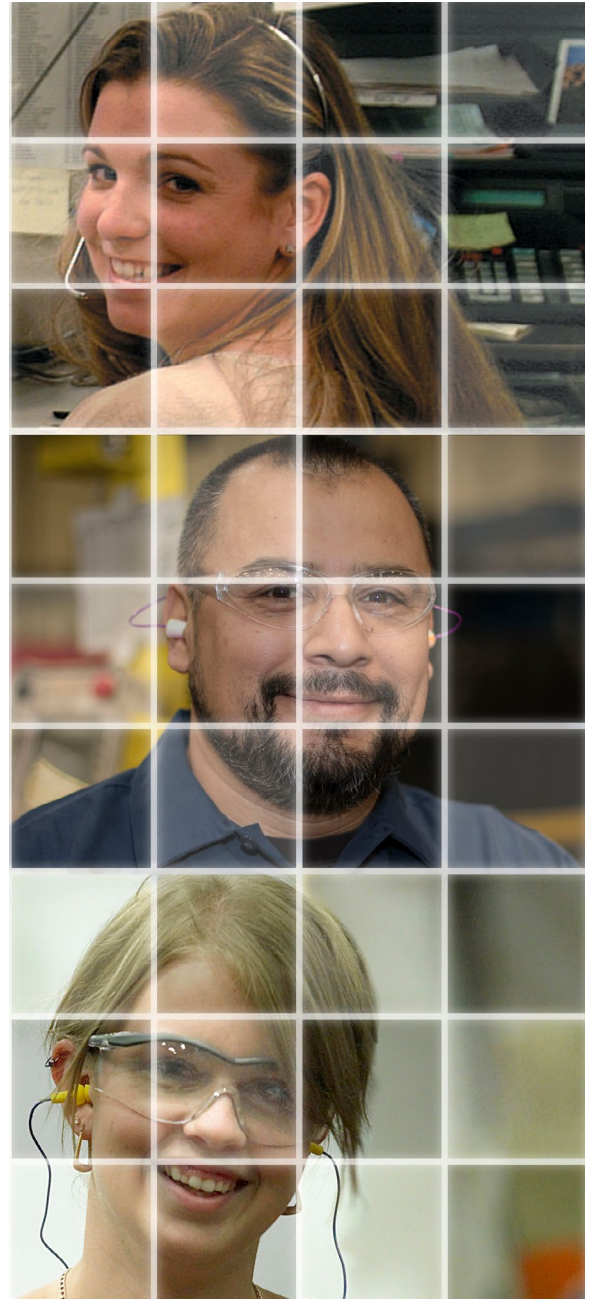
1. Relentless Customer Focus
2. Long-Range View
3. High-Quality Products
4. Be The Leader
5. Everybody Matters
6. Enable Growth
7. Risk-Taking Innovation
8. Give Back
9. Have Fun, Be Humble

Welcome to Our Code

Our Code of Business Conduct and Ethics is designed to create a safer, stronger company.

Inside our Code, you will find

- High-level guidance about ethical topics that may affect you in the workplace
- Definitions of key terms and day-to-day scenarios that put these topics into perspective
- Inspiring words from our leaders and coworkers demonstrating how we **Live Our Values**
- Ways to **Connect** with resources that provide you with more information



Who Our Code Applies To

All worldwide employees of Simpson Manufacturing Co., Inc. and its subsidiaries or affiliates (“Simpson Strong-Tie,” “we,” “us” or “our”), including directors, officers, temporary service workers, independent contractors, and consultants must comply with our Code. We also expect everyone working on our behalf, including our agents, suppliers and other third parties (our “business partners”) to follow the spirit of our Code and observe the same high standards we do.

Upholding Our Code

We are committed to upholding our Code. Violations of our Code, our policies or the law can result in disciplinary action, up to and including termination of employment. Depending on how serious the incident is, there can even be civil or criminal consequences for the person involved and for Simpson Strong-Tie.

Any waiver or exception to the Code will be appropriate only in very limited circumstances and must be approved in advance by Simpson’s Chief Executive Officer. Any waiver or exception for a director or executive officer must be approved by Simpson’s Board of Directors and may be publicly disclosed as required by applicable rules or regulations.



Be the Leader

“Ultimately, the success of a great company depends on you, its people.”

Barc Simpson



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Speak Up, Listen Up12

Know Your Responsibilities

At Simpson Strong-Tie, we follow the example that Barc set by upholding our Values.

To do this, we

Conduct business with integrity. We let our Values inspire our work. We follow our Code, company policies and the laws that apply to our jobs. And we reach out to [people who can help us](#) anytime we're unsure of what to do.

Share our concerns. We're known for operating with integrity, so we [speak up](#) if we see or suspect anything unethical or illegal, and we cooperate with any investigations into misconduct.

Hold our leaders to a high standard. We expect all leaders to always model ethical behavior, encourage ideas and create the kind of workplace where employees feel comfortable coming forward with questions and concerns.

Respect and learn from each other. We believe treating everyone with respect and dignity and honoring each other's backgrounds and ideas. We strive to be a place where everyone feels included, collaborates, and learns and grows from one another.



Do the Right Thing

Our Code can't address every situation we may face on the job, so we exercise good judgment and ask for help when we need it.

For us, exercising good judgment means we

Ask ourselves some questions. If we encounter a situation where the proper course of action is unclear, we can check the Code and our policies. If the answer is still unclear, we consider the following questions. If we can answer “yes” to all four, it's probably safe to move forward, but a “no” or “I'm not sure” to any means we stop and ask for guidance before proceeding.



Seek guidance. If we should encounter a local law or custom that seems to conflict with our Code, we always follow the more restrictive requirement. If it's difficult to determine which requirement is more restrictive, we seek guidance from our supervisor or other company resource.

➤ **What would you do** in a situation where acting ethically would conflict with making a profit for Simpson Strong-Tie?

Acting ethically and conducting business with integrity are more important than making a profit. Our reputation rests on our commitment to doing the right thing, and we never compromise our long-term, hard-earned reputation for short-term gain. Keep Barc's principle in mind, "The view is long range; people never sacrifice tomorrow for the sake of today."

➤ Live Our Values

"Simpson culture is a dedication to uphold Barc's Nine Principles in all that we do and working together to make it possible."

Simpson Strong-Tie Employee



Speak Up, Listen Up

We believe in open communication and working together to create the kind of environment where everyone feels safe, in being heard and being understood.

As part of this, we

Know where to turn. If we see or suspect someone has violated our Code, a policy or the law, we come forward knowing there are many resources available to assist us with questions or problems.



<p>Your supervisor</p>	<p>Start here. In most cases, your supervisor is in the best position to address an area of concern.</p>
<p>Another supervisor or manager</p>	<p>If you're not comfortable speaking with your supervisor, or are not satisfied with their response, speak with another supervisor or manager you are comfortable approaching, including those in the Human Resources, Internal Audit or Legal departments.</p>
<p>Our confidential hotline, Speak Up Strong-Tie</p>	<p>If you're more comfortable sharing your concerns anonymously, you can access the hotline, 24/7:</p> <p>By visiting the website and filling out an online report: SpeakUpStrongTie.ethicspoint.com</p> <p>By calling – visit the website for a list of toll-free phone numbers by location: SpeakUpStrongTie.ethicspoint.com</p> <p>Information provided through the hotline is documented in detail and forwarded (anonymously, if you choose) to the Legal Department of Simpson Strong-Tie for investigation and follow-up.</p>

Know what happens next. Simpson Strong-Tie investigates reports of misconduct thoroughly, disclosing information only to those who need to know in order to resolve the issue and handling concerns promptly, with sensitivity and discretion. As a company, we know it takes courage to come forward and share a concern. That's why the company prohibits retaliation against anyone who makes a report or assists in an investigation into misconduct. For ways to speak up, please see our Speak Up Listen Up policy.

> Live Our Values

"Our culture emphasizes valuing individuals and encourages them to speak up and share ideas."

Simpson Strong-Tie Employee

> Connect

[Speak Up Listen Up Policy](#)

For more information, see our Helpful Resources section on the last page.





Everybody Matters

“... we’re all working together toward the same goal. We rely on each other to be successful, we show each other respect.”

Barc Simpson

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Preserve Our Secret Sauce

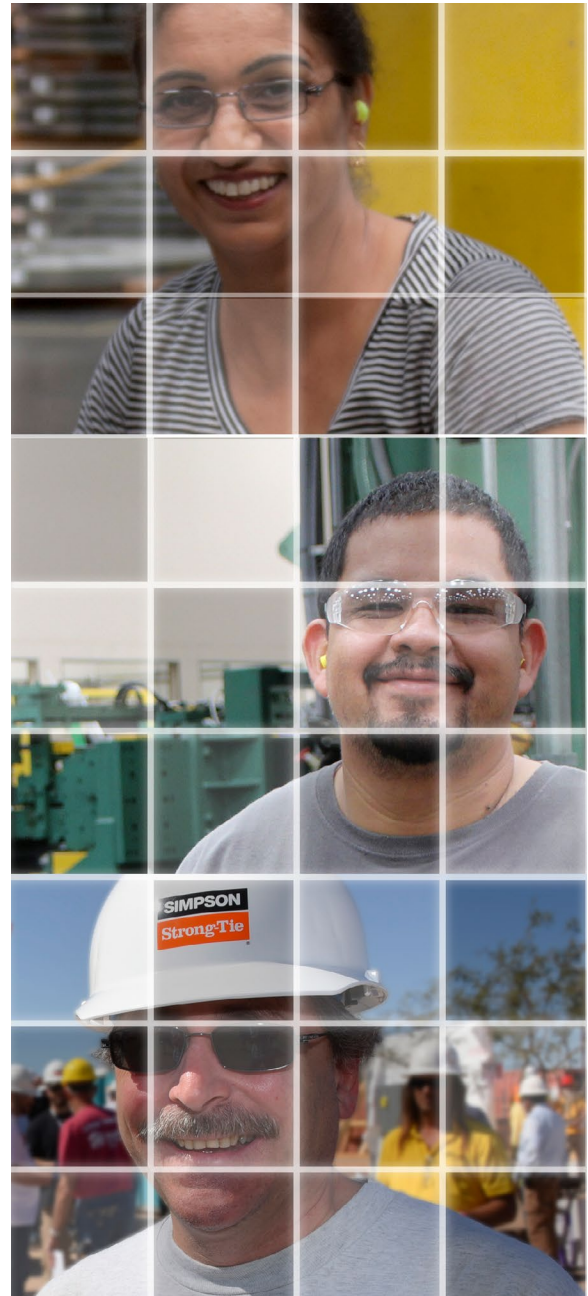
Fair business practices and a deep respect for others have shaped who we are.

We recognize how important it is to

Honor the contribution of every employee.

Every individual's background, perspective and level of experience is important. We listen and stay open to different points of view, because it's not just what we make – it's what we make together.

Promote equal opportunity. We are an equal opportunity employer, committed to creating and retaining a diverse workforce. This means that to the fullest extent required by law, employment-related decisions are based on merit and business needs and not on sex, race, color, age, religion, disability, national origin, veteran status, sexual orientation, gender identity, familial status, citizenship status, genetic information, pregnancy, childbirth or related medical conditions or status in any other group protected by federal, state or local law. This applies to all areas of employment, including recruitment, hiring, training, promotion, compensation, benefits and all other privileges, terms and conditions of employment. We also make reasonable accommodations for qualified applicants and employees with disabilities unless doing so creates an undue hardship, in accordance with all legal requirements.



Safer, Stronger

"We describe the unique culture of our organization as our 'Secret Sauce.' This name stems from the idea that our company culture is made up of all of the unique characteristics and talents (ingredients) of our employees."

*Karen Colonias
Former CEO (2012-2022)*

> Live Our Values

"We are all so different, but those differences come together to make one cohesive unit. We all possess different attributes and work well together."

Simpson Strong-Tie Employee

> Connect

[Position on Human Rights](#)

[Secret Sauce Handbook](#)

[Speak Up Listen Up Policy](#)

[US General Policies](#)

[US Prohibition of Sexual and Other Workplace Harassment Policies](#)

For more information, see our Helpful Resources section on the last page.

> Watch: The Makers of Simpson Strong-Tie - Meet Emily



Maintain an Ethical and Respectful Workplace

Together, we promote an environment that is free of harassment, discrimination, bullying or abusive conduct — a place where everyone is valued and treated with respect and dignity.

At Simpson Strong-Tie, we

Do not tolerate harassment, discrimination, bullying, or abusive conduct. Regardless of the form it takes or whether we experience it personally or see it directed at someone else, we report it. Harassment, discrimination, bullying or abusive conduct can take many forms, including:

- Unwelcome remarks, gestures or physical contact
- The display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including by email, text and on the internet
- Offensive or derogatory jokes or comments (explicit or by innuendo)
- Verbal or physical abuse or threats

Check our own individual actions. We treat each other as we would want to be treated, and we stay alert to how our actions and comments affect those around us — including coworkers, customers and business partners.



➤ **What would you do** if one of our employees or suppliers told a sexually explicit joke during a meeting?

We're all accountable for stopping harassment, whether it happens inside or outside of the workplace — including work-related meetings, business trips or offsite events. If you're comfortable doing so, you should interrupt and ask the person to stop. If you prefer, relay the incident to your supervisor, another manager or [another company resource](#) without fear, knowing that Simpson Strong-Tie prohibits retaliation against anyone who comes forward.



> Live Our Values

“To me, I believe the culture is that you treat your coworkers like family and your customers as if they were your neighbors. Treat everyone with kindness, compassion, understanding, integrity and respect.”

Simpson Strong-Tie Employee

> Connect

[Anti-Corruption Policy](#)

[Anti-Hedging and Anti-Pledging Policy](#)

[Insider Trading Policies and Procedures](#)

[Speak Up Listen Up Policy](#)

[US General Policies](#)

[US Prohibition of Sexual and Other Workplace Harassment Policies](#)

For more information, see our Helpful Resources section on the last page.



Keep Everyone Safe

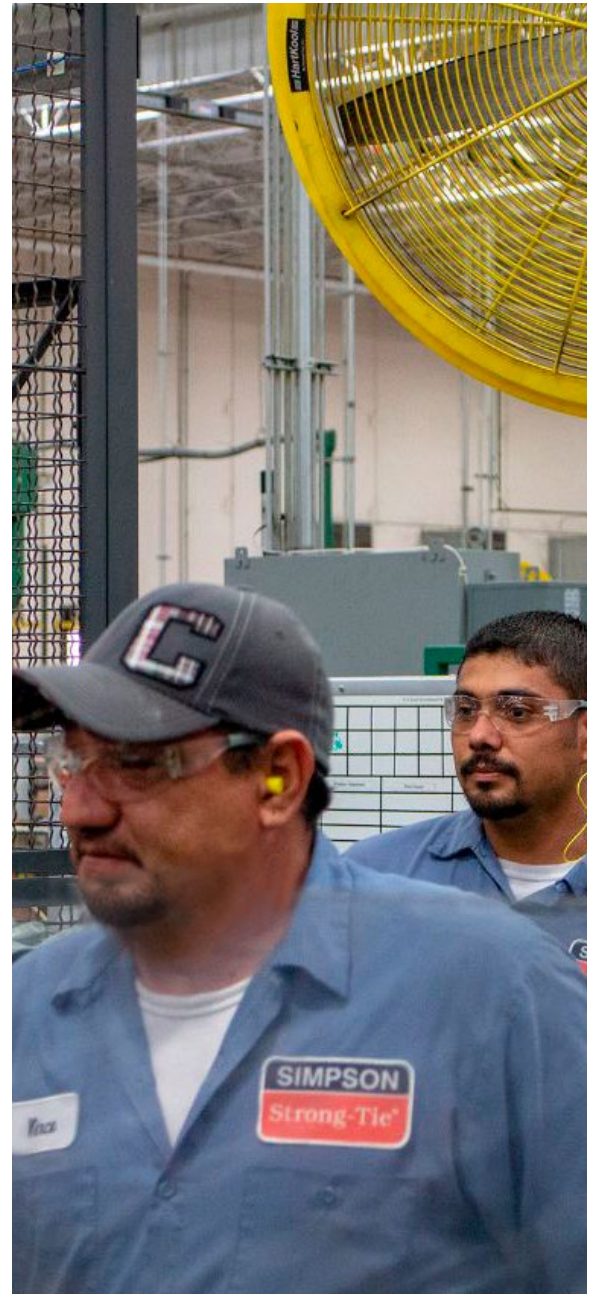
Safety is at the center of everything we do. We value the safety of all employees, and we continually work to minimize employee exposure to potential risk.

Every day, in every way, we

Never compromise when it comes to safety.

Our people are the most vital part of our business, and providing a safe, healthy and sustainable working environment is of fundamental importance. We aim for an injury-free workplace by following all safety laws, policies and regulations that apply to our jobs and our work location. We also make sure to communicate these requirements to any visitors, to ensure their safety.

Make sure we're taking all precautions. We complete any required training before taking on any assignments or attempting to use or repair equipment. And we wear personal protective equipment when required.



Perform at our peak. We believe that substance abuse puts our most valuable resource – our people – at risk, so we don't allow anyone to work if they are under the influence of alcohol, controlled substances or drugs that could adversely affect performance or put others at risk. We share our concerns if we see or suspect that a coworker's judgment or abilities are impaired.

Report any accidents or unsafe conditions. We promptly report any unsafe conditions, hazards or broken equipment. We also watch for and report any threatening or violent behavior.

> What would you do if you saw someone doing something in an unsafe manner?

We look out for each other's safety and well-being – that's just part of who we are. If you see something unsafe, speak up. Talk to your coworker about doing the task the safe way. If you don't feel comfortable approaching the person directly, talk to your supervisor or use [Speak Up Strong-Tie](#) to report your concern. Always remember our policy: At Simpson Strong-Tie, we operate in a safe and environmentally responsible manner to protect our employees, customers and communities, while benefiting society, the economy and the environment.

> Connect

[Environmental Health and Safety Policy](#)

[Position on Human Rights](#)

For more information, see our Helpful Resources section on the last page



Protect Privacy

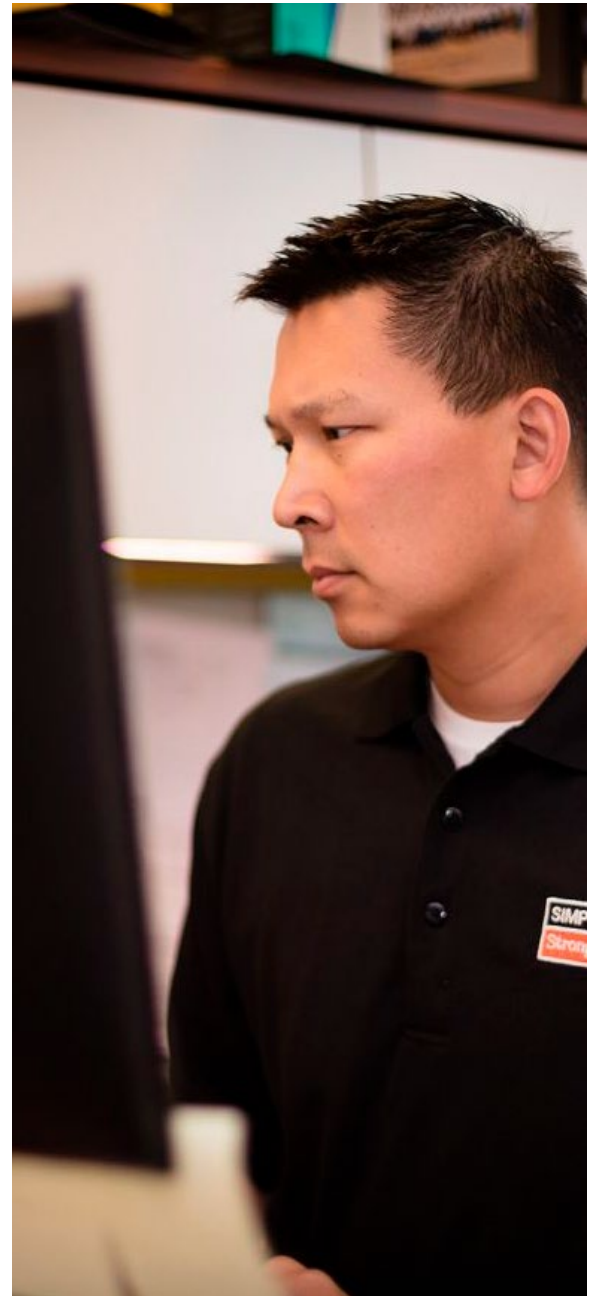
We understand that the personal information of our employees, customers and business partners is private information, so we do our part to keep it safe.

We make a commitment to

Recognize personal information. Any information that could be used to identify someone, either directly or indirectly, is “personal information.”

Manage it properly. We collect, use and share personal information in accordance with all applicable data privacy laws, regulations and Simpson Strong-Tie policies.

Safeguard it. We make sure we don’t disclose personal information to anyone, either internally or externally, unless they have a legitimate business need for the information. If we’re not sure if information is considered personal information, we treat it as though it is. If we suspect that privacy has been breached and personal information has been disclosed – whether intentionally or accidentally – we report it immediately to the Legal department or use [Speak Up Strong-Tie](#).



What are some examples of “personal information”?

- A person’s name
- An address, email or IP address
- A phone number
- Bank or credit card information
- Health or benefits information
- Pay or performance information



> What would you do if one of your coworkers was home recovering from an illness and a customer asks you for the coworker’s home address to mail him a get-well card?

Although the customer means well in making this request, you have an obligation to keep your coworker’s information protected. You could, perhaps, suggest that the customer send a card to the office, but don’t share his home address with anyone – inside or outside of our company – without the consent of your coworker.

> Connect

[Acceptable Use Policy](#)

[Data Privacy and Protection Policy](#)

[General Information Security Policy](#)

[Mobile Device Policy](#)

[Written Information Security Program Policy](#)

For more information, see our Helpful Resources section on the last page.



Relentless Customer Focus

“... none of us has a job without customers.”

Barc Simpson

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Build Trust with Our Customers

Together, we share a commitment to doing what's right for our customers. Our business was built on this promise, and our future depends on it.

In every interaction, we

Provide superior customer service. We put the customer first. From problem solving to product installation, we take time to listen and support our customers every step of the way.

Deal fairly. We tell the truth about the quality, features and availability of our products and never take advantage of anyone by manipulating or misrepresenting the facts.

Respect the competition. We earn business based on the quality of our products and the integrity of our people. We never disparage our competitors' products in order to win business.

Remember: Our customers put their trust in us. We never forget our obligation to maintain that trust and conduct business with the highest ethical standards.



Safer, Stronger

“No matter what your position in the company, it’s vital that you keep the customers and users in mind whether you have direct contact or not. What do they need from you? How can you help make their jobs easier? How can you improve their lives?”

Barc Simpson

> Live Our Values

“Our ‘Customer First’ commitment is grounded in the belief that we must earn our customers’ business every day.”

Simpson Strong-Tie Employee

> Connect

[Anti-Corruption Policy](#)

For more information, see our Helpful Resources section on the last page.

> Watch: Why Choose Simpson Strong-Tie?



Be a Good Partner

Our business partners are integral in helping us support our customers. When they work honestly and with integrity, it not only builds on their reputation, it builds on ours.

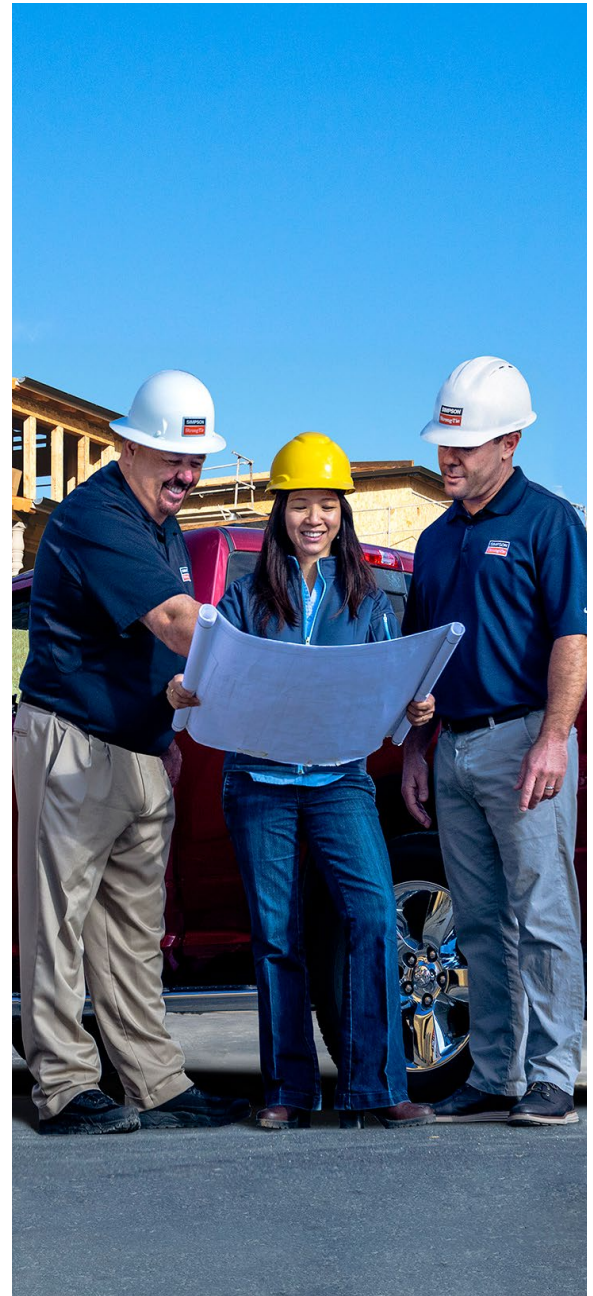
We have a responsibility to

Aim high. We look for business partners who share our commitment to high standards, and we should make sourcing decisions based on objective criteria – things like quality, price and delivery record.

Hold our partners accountable. Once an agreement is in place, it's important to stay involved, monitoring their performance and ensuring they meet their obligations and comply with the agreed terms.

Make sure we meet our obligations. We deal fairly with our business partners and protect their confidential information, intellectual property and personal information. Long-lasting relationships are built on mutual trust and respect.

Avoid any potential conflicts (even the appearance of one). Decisions we make must be based on what's best for Simpson Strong-Tie and our customers, not on favoritism or personal relationships (see the [Avoid Conflicts of Interest](#) section for more information).



> What would you do if you suspected – but weren't sure – that one of our distributors offered a bribe to a builder?

The best action would be to share your concerns immediately with your supervisor, company leader or use [Speak Up Strong-Tie](#). As a company, we are responsible for the actions of third parties working on our behalf, so this distributor's actions would not only have consequences for her and her company, but for our company as well. As our first CEO, Tom Fitzmyers, used to say, "Bad news wanted." Speak up if you see or suspect any behavior in our workplace that doesn't align with our Values, our Code or our policies.

> Live Our Values

"We are valued by the company and our customers (internal and external), which helps us maintain a sense of purpose. As a group, we care about each other and want our department and the company to succeed."

Simpson Strong-Tie Employee

> Connect

[Anti-Corruption Policy](#)

[Global Purchasing Policy](#)

[Position on Human Rights](#)

[Speak Up Listen Up Policy](#)

[Supplier Code of Business Conduct and Ethics](#)

[Supply Chain Disclosure](#)

For more information, see our Helpful Resources section on the last page.



Compete Fairly

We earn the business the right way.
We put our very best into our products
and let free, fair and open competition
drive our success.

We always

Comply with the law. Most countries have laws designed to promote competition and keep the marketplace thriving – we comply with antitrust and competition laws wherever we do business and avoid conduct that might even suggest a violation.

Compete fairly. We won't enter into any agreements – formally or informally – or engage in any business practices that could limit fair competition.

Gather publicly available information about our competitors. We look at public sources such as newsfeeds, industry surveys and public-facing internet sites.



When conducting company business, all employees must:

- Not discuss pricing, production or markets (including splitting up territories or customers) with competitors
- Present our services and products in a matter consistent with our core values
- Not induce a third party to breach an existing agreement
- Never act in a manner that could be seen as an attempt to exclude present or potential competitors or to control market prices

> What would you do if an informal conversation with a competitor at an industry trade show began leading into a discussion about pricing strategies?

You would need to be careful, knowing that even casual conversations can potentially violate the law. If you're ever in a situation where the conversation turns to a competitively sensitive topic – like pricing strategies – put a stop to it. You might say, "This is not an appropriate conversation to have as competitors." Make it clear that the discussion is inappropriate, then remove yourself from the situation and report the incident to your supervisor and the Legal department immediately.

> Connect

[Anti-Corruption Policy](#)

[Insider Trading Policies and Procedures](#)

[US General Policies](#)

For more information, see our Helpful Resources section on the last page.

High-Quality Products

Our products meet their defined factors-of-safety for performance: “... each and every person in the company plays a role in ensuring that our products meet [these] high standards.” This is the bar, and it doesn’t move.

Barc Simpson

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Uphold Our Commitment to Safe, Quality Products

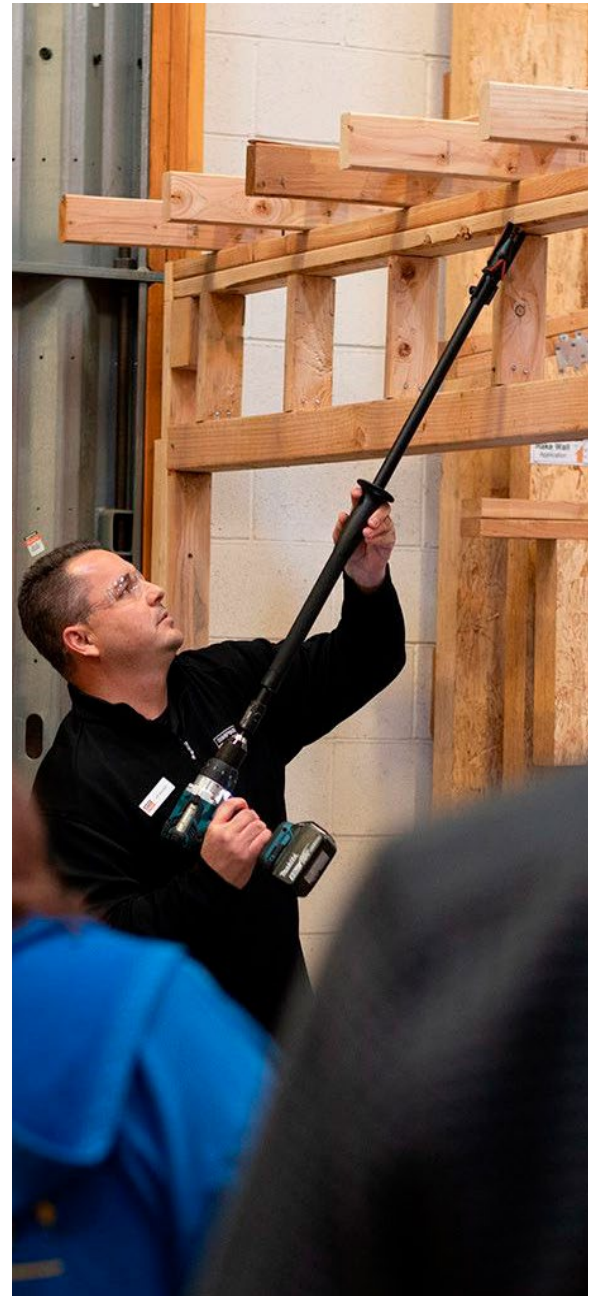
From the first joist hanger to the global line of structural solutions we produce today, we are passionate about the performance of our products and solutions. It's earned us a No-Equal® reputation in the industry.

To preserve our commitment, we

Work to maintain our customers' trust. We follow strict processes and procedures to meet or exceed our own internal standards, as well as the standards set by laws, government regulations and our industry.

Don't take shortcuts. We never compromise or bypass safety or quality control requirements – our customers are too important, and the stakes are too high.

Take personal accountability. We look for ways to make our products even better without sacrificing quality or safety. If we observe any situation that could compromise our products, we take action.



Safer, Stronger

“The company makes quality products that contribute to the quality of life in a significant way.”

Barc Simpson

➤ **What would you do** if a coworker suggested a change in a manufacturing process that would speed up production but possibly compromise quality?

Encourage your coworker to discuss the idea with your supervisor. Suggestions for process improvements are always welcome (as Barc used to say, “Innovation and creativity are encouraged”), but quality always comes first. That’s why process changes must be carefully reviewed, vetted and approved before they are implemented to make sure there is no adverse effect on the quality of our products.

➤ Live Our Values

“We ensure that anything with our name on it reflects our quality standards.”

Simpson Strong-Tie Employee

➤ Connect

[Quality Policy](#)

For more information, see our Helpful Resources section on the last page.

➤ Watch: World’s Largest Earthquake Test



Keep Our Marketing and Advertising Promises

Our customers make critical decisions based on the information we provide about our products, so we communicate honestly and transparently.

In selling our products, we

Tell the truth. We accurately represent our products in our sales, advertising and marketing materials and ensure that claims we make have been substantiated. We also include alerts or warnings, where appropriate, to promote proper use.

Never mislead. When it comes to product features, functionality and availability, we promise only what we can deliver, and then deliver on what we promise.



Safer, Stronger

“Our customers trust that we’re going to have products that are cost effective, that can install quickly, but more importantly are going to meet the building code requirements.”

*Karen Colonias
Former CEO (2012-2022)*

> Live Our Values

“We have a special environment at Simpson Strong-Tie where we have high standards and high values, and it is played out by all employees in every aspect of our business.”

Simpson Strong-Tie Employee

> Connect

For more information, see our Helpful Resources section on the last page.

> Watch: The Makers of Simpson Strong-Tie: Eric





Risk-Taking Innovation

“Don’t become stagnant in your job, be curious. ...you’ll inspire yourself and others...”

Barc Simpson

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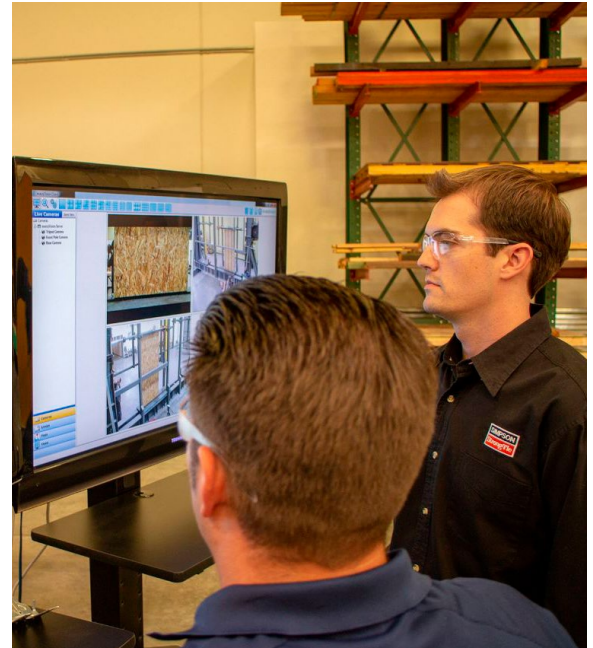
Safeguard Company Assets

We are good stewards of our facilities, equipment and resources. These assets help us achieve our mission, every day.

We understand our obligation to

Protect our physical assets. We take care of the assets entrusted to us, using them as they are meant to be used and protecting them from loss, misuse and damage. We don't use company assets for personal gain, and we never borrow, lend, give away or dispose of them unless we have approval from Simpson Strong-Tie management.

Protect our electronic assets. We follow our IT policies and practice good cybersecurity to keep our systems and networks running smoothly and virus free. To further protect our electronic assets, we use only company-approved hardware, software, applications and storage devices.



What are some examples of “company assets”?

Physical assets such as

- Machinery and tools
- Furniture
- Office supplies

Electronic assets such as

- Die design and software
- Networks and databases
- Internet access



Only use Simpson Strong-Tie assets for Simpson Strong-Tie business. Occasional use of assets like telephones, copiers and computers for personal reasons is permitted. But we understand that personal use should be infrequent and never interfere with our job responsibilities or violate company policies or the law. You should never use company assets for business purposes not associated with Simpson Strong-Tie.

Have no expectation of privacy. We’re aware that anything created on Simpson Strong-Tie systems is company property and, where permitted by law, the company may monitor its use.

➤ **What would you do** if a coworker told you that she was working on a project at home and planned to borrow company tools and equipment over the weekend to get it done?

If you're comfortable doing so, it would be good to remind her of our company policies and encourage her not to borrow these items for her personal use. Let her know that these are meant for company business, and if they get lost or damaged, even unintentionally, it could affect our productivity. If she ignores your request or indicates that borrowing these assets is no big deal, share your concerns with your supervisor or other company resource.

➤ **Connect**

[Acceptable Use Policy](#)

[General Information Security Policy](#)

[IT End User Policy](#)

[Mobile Device Policy](#)

[Non-Competition, Non-Solicitation, Inventions, and Confidential Information Protection Agreement](#)

[US General Policies](#)

For more information, see our Helpful Resources section on the last page.



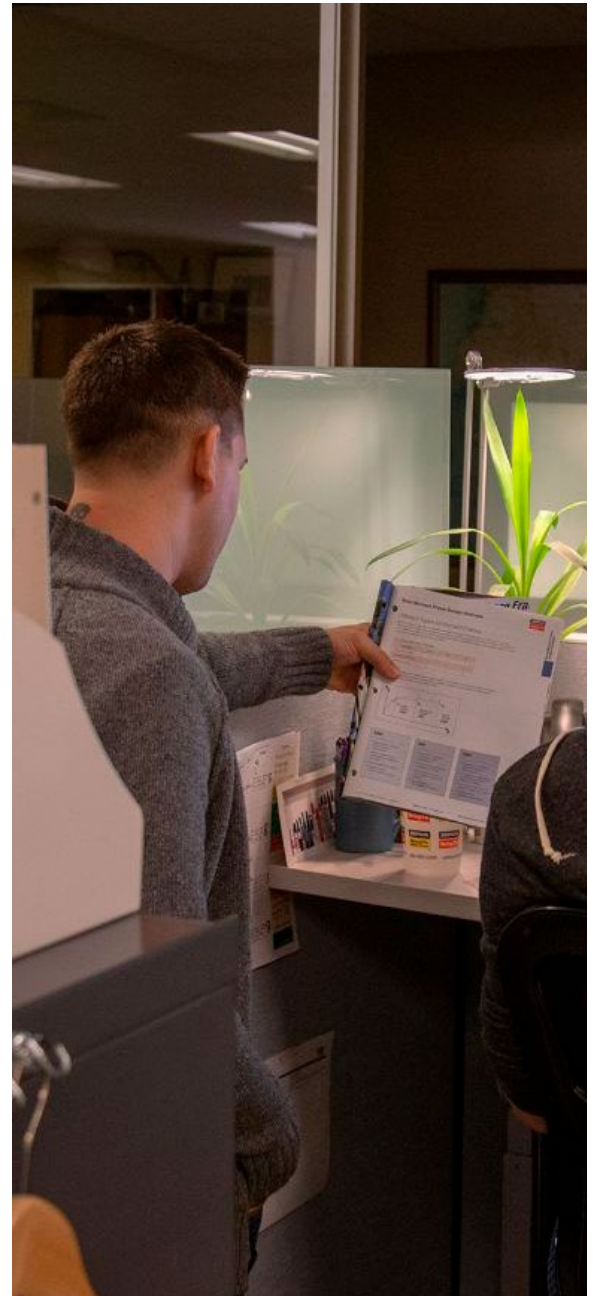
Be a Good Steward of Our Intellectual Property (IP)

Our company was started by an entrepreneur with an idea worth protecting. That's why we keep our intellectual property safe, and we respect the intellectual property of others.

To keep it safe, we

Only use our IP for business purposes. IP represents not only a significant investment of time and resources, but also the basis on which new ideas are created. So, we don't share our IP with anyone – inside or outside of Simpson Strong-Tie – unless there is a legitimate business reason to do so.

Respect the IP of others. We appreciate the time and resources that other companies devote to their IP, too. We seek advice from the Legal department before asking for or using the IP of our business partners, and we take precautions to make sure we don't infringe on their IP rights.



What is “intellectual property”?

Intellectual property (IP) is a term given to the creative ideas, thoughts and processes behind our products. IP is confidential information and includes

- Patents
- Technical data
- Copyrights
- Trademarks and trade secrets

Be aware that Simpson Strong-Tie owns any work product that you develop or design in connection with your work with us. And that ownership continues even if you should leave the company.

Safer, Stronger

“Great companies are built on creative ideas from talented people . . . ”

Barc Simpson

> Live Our Values

“I appreciate the fact that I can trust we all have the best interests of the company and each other at heart. No one puts their personal interests over the common good.”

Simpson Strong-Tie Employee

> Connect

[Non-Competition, Non-Solicitation, Inventions, and Confidential Information Protection Agreement](#)

For more information, see our Helpful Resources section on the last page.

Keep Confidential Information Confidential

Confidential information – about our company, our people, our customers and our business partners – is also a critical asset, and one we are very careful about protecting.

In our day-to-day work, we

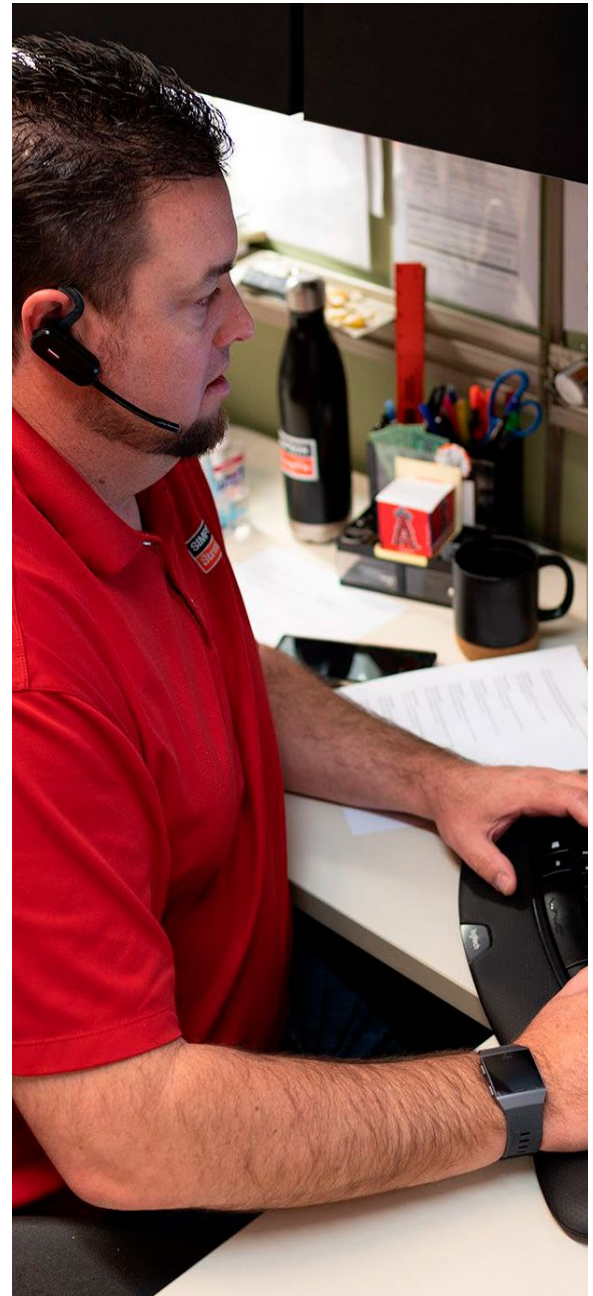
Use confidential information responsibly.

We mark/classify it properly, view/store it securely and limit its access only to those who need the information to do their jobs. We make sure that anyone outside of Simpson Strong-Tie, who requires confidential information about our company, has signed a confidentiality or nondisclosure agreement.

Watch where we share confidential information.

We don't discuss confidential information with friends or family or in public places – like elevators, restaurants and public transportation – where others could hear us.

Remember that our obligation endures. If we should leave our jobs at Simpson Strong-Tie, our responsibility to never use or disclose confidential information continues.



What are some examples of “confidential information”?

- New product research, specifications and designs
- Unpublished financial data
- Marketing plans and forecasts
- Pricing strategies
- Procurement data

[Personal information](#) and [intellectual property](#) are confidential, too, and require the same level of protection.

➤ **What would you do** if a new employee who used to work for a competitor – a competitor with a reputation for using a unique tooling process that has made their products very popular in the marketplace – joined your team, can you ask your new team member about that process?

No. It’s OK for him to apply the general knowledge and skills he learned in his previous work. But asking him about information that’s proprietary to the company would violate his obligations, our policies and possibly the law. He is obliged to protect confidential information about his former employer – just as you would have a responsibility to protect Simpson Strong-Tie confidential information if you ever left the company.

➤ Connect

[Insider Trading Policies and Procedures](#)

[Non-Competition, Non-Solicitation, Inventions, and Confidential Information Protection Agreement](#)

[Speak Up Listen Up Policy](#)

For more information, see our Helpful Resources section on the last page.

Avoid Conflicts of Interest

We know our company's future is in our hands, so we make business decisions in the best interests of Simpson Strong-Tie.

To avoid potential conflicts, we

Understand the definition of a conflict of interest.

A conflict of interest can happen anytime a personal relationship, interest or activity interferes with the work we do or the decisions we make as employees of Simpson Strong-Tie.

Recognize the kinds of situations that can pose a conflict. Although it's not possible to list every potential conflict of interest scenario, there are some situations where they arise more frequently – being familiar with those situations is the best way to avoid them.

Follow our Business Entertainment and Gift Policy.

We know that business entertainment and gifts can play an important role in strengthening relationships and promoting our company's services, but if abused, they can affect our objectivity and pose a conflict of interest.



What are some examples of “conflict of interest” situations?

- Starting a business or a job at a company that competes or does business (or wants to do business) with our company
- Supervising someone who is a friend or member of your family
- Investing in a customer, competitor or business partner
- Taking for yourself an opportunity that you discover through your work
- Accepting a role as a director, advisory member or officer that interferes with your obligations to Simpson Strong-Tie

In providing entertainment, we follow the “rule of reasonableness,” making sure anything given or received

- Is consistent with our Values
- Conforms to generally accepted local customs
- Is permitted under local law and our customers’ company policies
- Is never offered to influence a business decision

Any gifts we provide or accept must

- Be tasteful and appropriate for the occasion
- Be modest in value
- Be customary in the country where it’s offered
- In general, be for business – not personal – use
- Be offered with the intent to promote, foster or build upon a business relationship

Seek guidance. If we believe we (or even members of our family) might have a conflict, we disclose it immediately to the Legal department, knowing that most conflicts can be resolved if they’re disclosed early and properly managed.

> **What would you do** if you weren't sure if a particular situation represented a conflict?

Ask yourself a few key questions:

Could the situation I'm considering affect the decisions I make for Simpson Strong-Tie?

Could it interfere with my job responsibilities?

Could others (inside or outside of our company) view this as a conflict?

If the answer to any question is “yes” or “I’m not sure,” there may be a potential conflict, so ask for help before moving forward. Remember, even the appearance of conflict matters, because it can erode the trust that others put in you and in Simpson Strong-Tie. Work with your supervisor to address any potential conflict or the perception of one.



> **Connect**

[Anti-Corruption Policy](#)

For more information, see our Helpful Resources section on the last page.

Enable Growth

“... seek out the positive in everyday challenges, and find new opportunities to contribute to the company’s success.”

Barc Simpson

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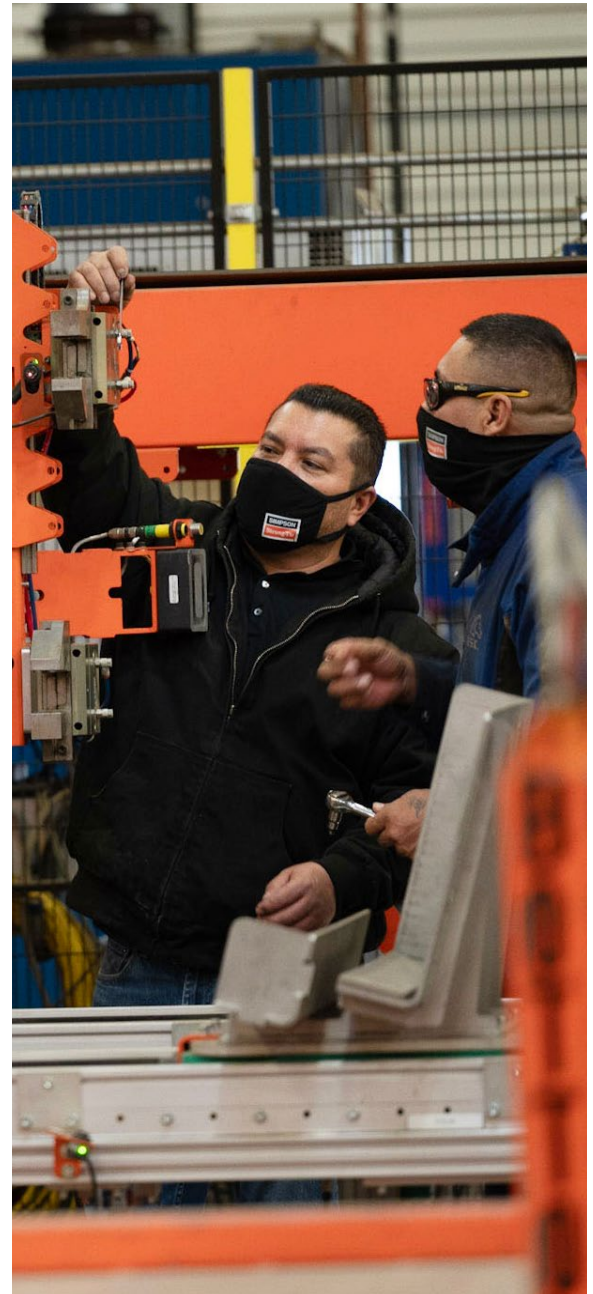
Never Bribe

We do business honestly and with integrity. We always have. We always will.

To combat bribery and corruption, we

Win business on the basis of our No-Equal® products. We never offer or accept anything of value in exchange for a favorable business decision, and we don't allow others to bribe or offer inducements on our behalf. Some laws make a distinction between bribing someone in the private sector and someone in the public sector – we don't bribe anyone anytime for any reason.

Know a bribe when we see one. We know that “anything of value” can be something other than cash. It can take the form of a gift, a favor, a vacation, a donation or even a job offer – anything of any value that is given to get (or keep) business or a business advantage is a bribe and violates our policies and the law.



Watch what we give and receive. We ensure that anything given or received complies with our policies and is properly documented in our books and records. By doing so, we not only avoid the appearance of anything improper, we also maintain the trust of our customers and business partners. The intent of any gift should always be to promote, foster or build relationships with our customers and business partners.

Accurately record. We make sure that any payments we make – or are made on our behalf – are authorized and approved by our policies, procedures and other internal control requirements and include documentation that supports the purpose of the payment. Undisclosed or unrecorded payments or assets are prohibited, and (except for petty cash) we don't conduct any cash transactions without prior written approval.

Safer, Stronger

“Always be straightforward. Don't just tell people what they want to hear. Tell it like it is.”

Barc Simpson

> What would you do if, during contract negotiations for a large project, a city official asks if you can help her son get a summer job at Simpson Strong-Tie? She hints that it could mean the difference between our company getting and not getting the project.

It sounds like the official is soliciting a favor in exchange for a project. You may provide her with information about available job opportunities at our company – just as you would for anyone who inquired. Anything beyond that (especially while negotiations are underway) could be viewed as a bribe and would be a violation of our policies and perhaps even the law. Contact your Sales Manager or the Legal department and advise them of the request from the city official.

> Connect

[Anti-Corruption Policy](#)

[Political Spending and Lobbying Policy](#)

For more information, see our Helpful Resources section on the last page.

Keep Complete, Accurate Records

We maintain good records, because they help us make good business decisions – decisions that build on both our success as a company and the trust of our investors.

To maintain financial integrity, we

Record information accurately. We recognize that each of us, regardless of job responsibility, is a record keeper, so we make sure that what we report or record is always accurate, complete, honest and timely. We follow the systems, controls and procedures we have in place as a company, to ensure compliance with accepted rules and controls required by the US Securities and Exchange Commission, the Financial Accounting Standards Board, the New York Stock Exchange and any other applicable laws, regulations and accounting practices.

Manage our records appropriately. We protect, store and dispose of information as prescribed by our policies, and we never destroy documents that may be relevant in a legal proceeding or subject to a legal hold.



What are some examples of a “record”?

- A timesheet
- A work order
- A purchase order
- A contract
- An invoice
- A regulatory or government report
- An expense report



Meet our legal and regulatory obligations.

We provide truthful and timely information to investors and to government agencies and regulators, as required. We comply and cooperate with government audits, investigations and inquiries.

Stay alert. We watch for irregularities or inaccuracies and report any suspicious activities, including “off the books” accounts, costs assigned to the wrong project, sales tracked to the wrong time period or a lack of required approvals or supporting documentation.

➤ **What would you do** if a long-time, loyal customer started making all-cash payments for large orders? This change seems unusual but you don't want to question it and jeopardize what is otherwise a great business relationship.

Since the cash payments we're receiving deviate from this customer's normal transaction history, it would be good to follow up with them. Barc used to say, "Never fear to ask the dumb question – and pursue it in detail until the answer becomes clear." Transactions like these could signal something improper, like money laundering, so making an inquiry would be the right thing to do. You may learn of a good reason for this change – or you may uncover a practice that ought to be brought to light and immediately addressed.

➤ Live Our Values

"I am in awe of the tenure in our group, but mostly I can't say enough about everyone's willingness to help and teach. It is very refreshing to work with a group of people who are all invested in each other's success."

Simpson Strong-Tie Employee

➤ Connect

For more information about our Finance policies and reporting controls, please contact your location's controller or the [Chief Financial Officer](#).



Help Us Do Business Around the World

As our business extends into the global marketplace, we are committed to complying with the requirements associated with international trade.

In conducting business, we

Respect import, export and trade laws. We make sure our products are properly classified and take care to secure all required documentation, labeling, licensing, permits and approvals. If we have questions, we ask for help, because providing Simpson Strong-Tie® products around the world is a privilege that we don't want to jeopardize.

Follow global trade controls and economic sanctions. We don't market to, sell to or partner with countries, organizations or people that are restricted or sanctioned, and we don't participate in boycotts that are illegal under applicable law.

Send the right message. When we're proactive in communicating with our business partners about our policies, we help ensure the integrity of our supply chain. We never ignore behavior by companies working on our behalf that could be unlawful.



> Connect

[Global Purchasing Policy](#)

For more information, see our Helpful Resources section on the last page.

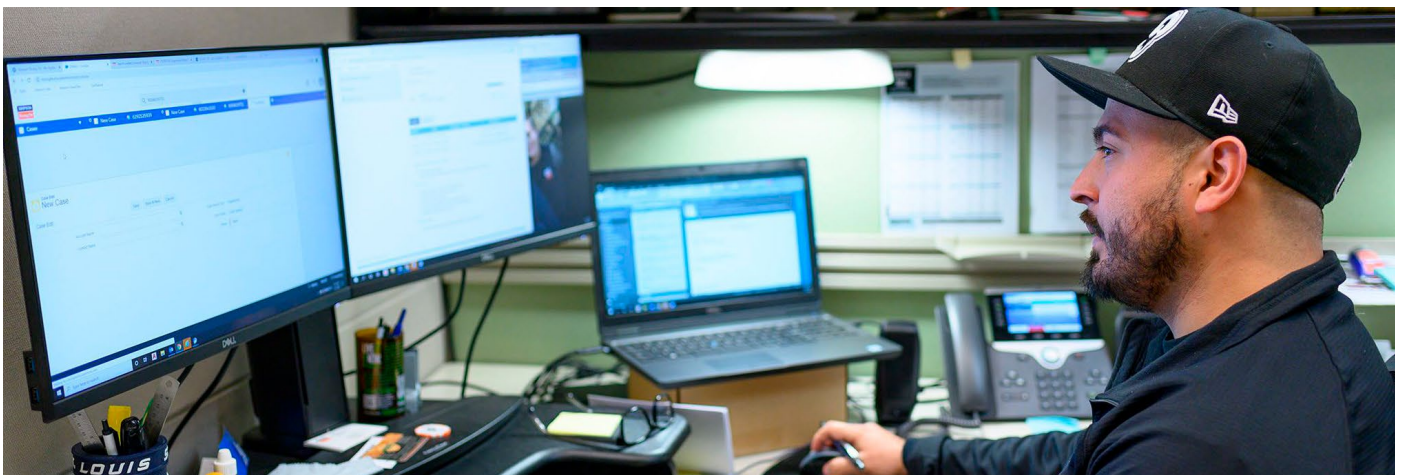
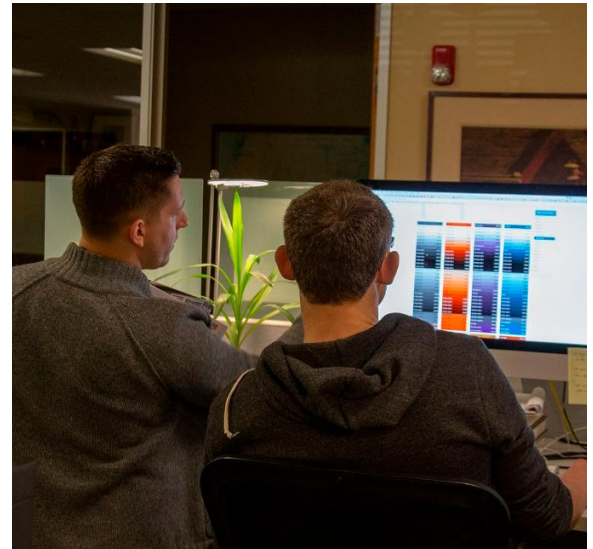
Don't Trade on Inside Information

We respect and comply with insider trading laws and restrictions.

We have an obligation to

Do what's right. As employees, we may have access to material, nonpublic ("inside") information about Simpson Strong-Tie (or other public companies), but we don't buy, sell or hold onto stock or securities based on that information because it would not only be a breach of the trust placed in us, it would also be unlawful.

Don't tip. Passing along information to others, like friends and family so that they may trade on that information is also illegal.



What are some examples of “inside” information?

Information is: (1) “material” if an investor might consider it important in making a decision to trade, and (2) “nonpublic” if it hasn’t been broadly communicated to the public. Examples include information about

- Company financial results
- The gain or loss of a large customer or supplier
- A change in senior management
- Potential mergers or acquisitions
- Litigation or pending lawsuits

> What would you do if you weren’t sure if some particular information was considered “inside” information?

Ask. It’s as simple as that. Seeking guidance and finding out for sure are the best ways to not only protect sensitive information, but also prevent a violation of the law.

> Connect

[Insider Trading Policies and Procedures](#)

For more information, see our Helpful Resources section on the last page.



Long-Range View

“Show respect and build trust in everything you do ...”

Barc Simpson

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Promote Human Rights

We believe in the value, the contribution and the dignity of every individual and are committed to protecting their rights as workers.

To put this commitment into action, we

Advance fair employment practices. As a company, we pay a legal wage and provide safe working conditions. We prohibit child labor, forced labor and human trafficking within our own operations and intend to do the same throughout our supply chain.

Expect our business partners to act ethically.

Our customers and business partners should

- Be committed to the same high standards that we are.
- Adhere to humane workplace standards.
- Comply with laws aimed at providing conflict-free minerals.



> What would you do if you heard that a business partner we were considering had a reputation for engaging in questionable labor practices?

Even if you were not involved in the decision-making process regarding this business partner, it would be important to share what you heard with the colleagues responsible for making the decision. Whenever you learn about an activity that goes against our policies or our Values or could reflect negatively on our company, we count on you to speak up.

> Live Our Values

“You are actually a person, not a number that does a particular job. You are a human being with a voice.”

Simpson Strong-Tie Employee

> Connect

[Position on Human Rights](#)

[Simpson Strong-Tie Sustainability, Environmental and Social Responsibility Report 2021](#)

[Supplier Code of Business Conduct and Ethics](#)

[Supply Chain Disclosure](#)

For more information, see our Helpful Resources section on the last page.



Protect the Environment

We all share one planet – we recognize the importance of being good caretakers and protecting our shared resources.

As a company and as individuals, we

Work to reduce our environmental footprint.

We comply with all applicable environmental laws, regulations and company policies and strive for environmental sustainability throughout our company. We minimize the amount of waste generated by our manufacturing process through companywide Lean practices. Once manufactured, our products are built to last and to preserve the structures in which they're used.

Recycle, reduce and reuse. As a purchaser of large quantities of steel, we look for ways to minimize steel waste and support the Circular Economy by recycling unused steel and reintroducing it into the material supply chain. We also embrace practices that will help to decrease our everyday use of energy and water. And we proactively recycle a variety of materials from aluminum cans and paper to wood pallets and electronic waste.



Say something. If we see or suspect an incident within our operations that could harm the environment, we immediately report it to the Director Global EH&S Program or use [Speak Up Strong-Tie](#).

Safer, Stronger

"It's important to make what impact you can . . ."

Barc Simpson

> Live Our Values

"We all understand that we need to be moving in the same direction to accomplish our goals. Everyone is dependable, and everyone understands that if Simpson is doing well, we all do well."

Simpson Strong-Tie Employee

> Connect

[Environmental Health and Safety Policy](#)

[Simpson Strong-Tie Sustainability, Environmental and Social Responsibility Report 2021](#)

For more information, see our Helpful Resources section on the last page.





Give Back, Have Fun, Be Humble

“We’re all connected in some way and are all part of a greater community.”

Barc Simpson

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Be a Good Person

We are more than just a business operating in the community; we strive to be a community advocate, a resource and a valued partner.

We believe it's important to

Give back. Barc Simpson instilled in each of us the idea that together, we can make a difference. Through our scholarship program, our four charitable giving focus areas, the Barc Simpson Community Hero Award, and Do What You Can Day, we continue to carry on his legacy every day. As employees, we're encouraged to be a part of these corporate initiatives (including our Matching Gift Program, where available), participating in a way that's meaningful for us.

Do what you can. Simpson Strong-Tie also encourages us to participate on a personal level in charitable, civic and political initiatives on a volunteer basis. We understand that these kinds of activities should be done on our own time, at our own expense.



Safer, Stronger

"Giving back to our communities is an integral part of our business. Our founder believed it was our responsibility to help others . . ."

*Karen Colonias
Former CEO (2012-2022)*

➤ **Live Our Values**

“What do I like most about my job? I like the chance to work with genuine people and to do things that contribute to the well-being of employees at the company and in our community.”

Simpson Strong-Tie Employee

➤ **Connect**

[Political Spending and Lobbying Policy](#)

[Simpson Strong-Tie Sustainability, Environmental and Social Responsibility Report 2021](#)

For more information, see our Helpful Resources section on the last page.

➤ **Watch: Simpson Strong-Tie: Celebrates Do What You Can Day**



➤ **Watch: Simpson Strong-Tie & Habitat for Humanity – Tucson Build**



➤ **Watch: Simpson Strong-Tie: Community Hero Award**



Communicate Responsibly

Simpson Strong-Tie has resources designated to speak on our company's behalf – if we get requests for information, we rely on those resources.

To preserve our reputation, we

Send a clear, consistent message. Each of us is a Simpson Strong-Tie ambassador and may be eager to share our views and perspectives about our company, but we must be sure that our customers and investors always get accurate and complete information. That's why we have a designated spokesperson to speak about company matters.

Don't speak for the company unless authorized.

If we are approached by someone outside of our company for information or to answer a question about Simpson Strong-Tie, we refer them to the Director of Marketing Communications.

Engage responsibly on social media. In blogging and posting online, we ensure that we protect confidential information and let others know that any opinions we share represent our own thoughts and views, not those of Simpson Strong-Tie.



> **What would you do** if a local reporter approached you at work and asked you to comment on a rumor circulating about our company?

You may be tempted to set the record straight, but don't. It's best to let the reporter know that you're not authorized to speak on behalf of the company and then politely direct them to the [Director of Marketing Communications](#).

> Live Our Values

"It always reminds me – I will never know everything. On the day I retire, it is completely possible for me to learn something totally new. That is something that I look forward to; it keeps me humbled and motivated."

Simpson Strong-Tie Employee

> Connect

[Global Social Media Guidelines for Employees](#)

For more information, see our Helpful Resources section on the last page.



Closing Thoughts: Living Our Values

It has been my pleasure to work alongside you all as we continue this journey of preserving the principles that Barc Simpson laid out over 60 years ago. And it's those principles that provided the solid foundation that this Code builds upon.

If you have questions about the laws and regulations that apply to our company or our industry, or if you need assistance navigating an ethical dilemma, please reach out for help. Your manager, your Human Resources team, the Global Compliance team and the Legal department are all resources available to help you meet the high ethical standards expected of everyone here at Simpson Strong-Tie.

Please note, our Speak Up Strong-Tie Hotline is an additional resource to share your concerns directly with our Legal Department.

Cassandra Payton
Vice President, Legal



Safer, Stronger

"It is important to remember that the work you do makes a difference."

Barc Simpson

Speak Up Strong-Tie Confidential Reporting

At Simpson Strong-Tie, we believe in doing what's right. This includes speaking up when you have concerns or questions about misconduct or unethical behavior. And when you do report something, we'll follow up to make sure your concerns are handled properly. If you like to speak up, the first step is to click the link below. (This website also lists local phone numbers if you would prefer to report by phone)

Helpful Resources

If you have any questions about the information in the Code of Conduct, please get in touch with anyone on this list using the contact information that can be found in our Workday directory.

- President and Chief Executive Officer
- Chief Financial Officer
- Vice President, Legal
- Vice President, Internal Audit
- Director, Global Compliance
- Director, Legal; Corporate Secretary and Compliance Officer — Insider Trading Policy
- Executive Vice President, Human Resources or HR Department
- Senior Vice President, Information Technology
- Director, Communications
- Director, Data Governance
- Director, Global EH&S Program
- Senior Manager, Internal Communications and Community Relations

The Code is not intended to create any contractual rights between Simpson Strong-Tie and anyone.

Simpson Strong-Tie supports an employee's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right.



SIMPSON
Strong-Tie

George

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