

	<h1>Company Policy</h1>	
<p>Effective Date: 1/1/24</p>	<p><b>SPEAK UP</b> <b>Strong-Tie</b></p> <h2>Speak Up — Listen Up</h2>	<p>Page 1 of 7</p>

## Purpose:

At Simpson Manufacturing Co., Inc. and its subsidiaries (the “Company”) we meet our responsibilities to each other by providing a work environment of open communication, respect, and trust, where everyone feels safe in speaking their mind and also feels heard and understood. These principles have made our Company successful in the past, and are key to our future success. To clarify and encourage behaviors aligned with these principles and expectations, we have established this **Speak Up — Listen Up** policy. At any time, employees have the right to **Speak Up** and discuss any matter with management, including the Chief Executive Officer of the Company. The Company is committed to supporting training and empowering our managers and supervisors to **Listen Up**.

Although the **Speak Up — Listen Up** principles apply to any concern you have, this policy and the following provisions, specifically address employees’ concerns around misconduct and breaches of the Company’s Code of Business Conduct and Ethics (“The Code”).

This policy is consistent with, and made part of The Code, as posted here (<https://ir.simpsonmfg.com/governance/governance-documents/default.aspx>)

This policy in no way should be seen as a restriction of an employee’s rights and protections to report concerns externally to any regulatory or governing body such as the U.S. Securities and Exchange Commission. See <http://www.sec.gov/>

This policy is subject to and complies with the Company’s Data Privacy policies as well as with the General Data Protection Regulation (GDPR), and other local & global data privacy regulations.

## 1. Responsibilities:

Employees who make concerns known (**Speak Up**) help the Company thrive by identifying issues and providing opportunities to adapt, innovate, improve or avoid costly mistakes. Our success depends on our employees informing the Company if something is not right, so we can address it. The Company requires all directors, officers, supervisors, and employees to comply

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with The Code and encourages employees to report concerns, violations or suspected violations in accordance with this policy or other applicable laws. Furthermore, the Company encourages all directors, officers, and supervisors to assist in the reporting process by listening (**Listen Up**) to a concern and ensuring it is communicated to the appropriate person and/or reported according to the Company’s Incident Management Process (detailed below). This will allow the issue to be properly investigated and addressed as well as to support the Company’s goal of protecting all of the parties involved (those Speaking Up and those that are the subject of the concern).

## 2. Anti-Retaliation:

This policy encourages and enables employees and others to raise concerns freely, without fear of retaliation. There will be no retaliation, harassment or adverse employment consequence for any director, officer, or employee who reports a concern or a violation of The Code or other applicable laws, rules or regulations. Employees will not suffer adverse employment consequences for cooperating with an investigation. Employees who retaliate against or harass another employee that has reported a concern or violation are subject to discipline, up to and including termination of employment.

## 3. Speak Up Guidance:

### In-Person

Our Company’s Open Door philosophy promotes the resolution of issues by communicating directly with one another. Through direct communication, we protect our Company and our unique culture, as well as demonstrate the Company’s commitment to addressing issues as they arise. We encourage you to share your questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, your supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with any manager or supervisor with whom you are comfortable approaching, including those in the Human Resources Department, Internal Audit Department, or the Legal Department.

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### Other Ways to Report a Concern

If you are more comfortable sharing your concerns anonymously, you can Speak Up through our confidential hotline, Speak Up Strong-Tie, which can be accessed several ways, including your mobile device, online or in writing. It is our hope and expectation that you find a way you are comfortable with to express your concerns. We do however, encourage you to reveal your identity, as it is more difficult, and in some circumstances even impossible, to investigate reports made anonymously.

The Speak Up Strong-Tie hotline is administered by a global, independent third-party Navex Global™ and hosted on their platform EthicsPoint®. This hotline makes it easy for you to report any issue anonymously. You can report questions, concerns, suggestions, or complaints through Speak Up Strong-Tie by the means listed below. While it is encouraged, employees are not required to share their name or other personal information. The investigation that follows from the report will be conducted in a manner that protects the confidentiality and anonymity (where local law allows) of the person reporting the issue and the subject of the issue.

➤ Computer or Mobile Device (Online Web Intake Form)

Speak Up Strong-Tie is a confidential independent service hosted by EthicsPoint and can be accessed on any computer or mobile device 24 hours a day/seven days a week. The URL is:

<http://SpeakUpStrongtie.ethicspoint.com/>

➤ Telephone Hotline

You can call 24 hours a day/seven days a week — follow the telephone prompts and a communication specialist will document your concerns.

Dedicated country specific toll-free numbers can be found in the appendix of this policy and on [mystrongtie.com/Compliance /Speak Up](http://mystrongtie.com/Compliance/SpeakUp).

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Here's what happens:

1. You will be given the option to remain anonymous. A customized web form or professional interview specialist will document your concern in detail.
2. Your information will be relayed to our Company for appropriate follow up.
3. You may be asked to check back to provide additional information or to answer questions our Company might have as we investigate your concern.
4. Reports submitted are handled promptly and discreetly.

**See Section 5, Safeguarding your Position, below for more details.**

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After **five to six** business days, use your report key and password to check your report for feedback or questions.

➤ In Writing (post or email)

You may share questions, concerns, suggestions, or complaints in writing (by mail or interoffice mail) or via email to any supervisor or manager you choose or directly to any member of the Internal Audit, Human Resources or Legal Departments. Send to:

Simpson Manufacturing Co., Inc.  
5956 W. Las Positas Blvd, Pleasanton CA 94568

It is not necessary to leave your name or other personal information. The investigation that follows from this communication will be conducted in a manner that protects the confidentiality and anonymity (where local law allows) of the person submitting the information.

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## 4. Listen Up Guidance

It is expected that employees with supervisory responsibilities genuinely and actively listen to and act on co-worker's expressed concerns. Handling concerns appropriately is critical to preserving trust and protecting the Company. Supervisory duties also include being aware of problems that could arise, maintaining control of activities in their areas, and connecting employees who have concerns to the appropriate person or process to report their concern, when applicable.

If someone raises a question, concern, suggestion or complaint, take these specific steps:

- Be grateful for the opportunity and trust given; thank the person for speaking with you — remember that they may be doing something difficult and very important for the Company.
- Take the matter seriously, remove distractions and give your full attention to the conversation.
- Do not discount the information (you do not have to validate what is being said, just listen).
- Show that you are committed to investigating and addressing the matter, even if you disagree.
- Maintain anonymity/confidentiality, and do not discuss the matter with others on your team.
- Be clear about the reporting process and expectations for follow up.
- Be helpful and offer to support them in the process — don't try to fix the issue (that may come later).
- Be curious without judgement. Try to understand the issue being raised without adding your own biases or perspectives or affixing blame. Listen to understand the facts and issues of concern and any other relevant information.
- Assist the employee in submitting the issue to Speak Up Strong-Tie, if necessary.

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## 5. Safeguarding Your Position:

Due to the potentially sensitive nature of your question, concern, suggestion or complaint, professional follow up is critical. All reporting is done confidentially. This means that information that you report will only be shared with a limited number of people on a strict need-to-know basis. Information will only be disclosed outside this small group if we are required to do so by law or an important public interest is at stake. Depending on the nature of the complaint, we might be required to inform the implicated person that a complaint has been filed against him/her, but your identity will not be disclosed. You can help us protect confidentiality by being discreet and not discussing your question, concern, suggestion or complaint with your colleagues or anyone else.

Our Company is committed to protecting the privacy of employees that Speak Up. Any personal data obtained as part of the reporting or investigative process will only be used for the purposes explained in this policy or to comply with the law or an important public interest, and the Company will do everything reasonable to safeguard personal data from unauthorized access and processing. It is the practice of the Executive Vice President of Human Resources, the Vice President of Internal Audit and the Executive Vice President, General Counsel to consult with one another regularly to protect the confidentiality of all parties involved and ensure appropriate action is taken.

Investigating assignments will be determined by the Company's General Counsel based on the nature of the issue raised. Managers or supervisors, while appropriately concerned about "getting to the bottom" of such issues, should not perform any investigative or other follow-up steps on their own. All matters, including suspected but unproven concerns, should be reported using the Speak Up Strong-Tie hotline for investigation assignment. Investigations will be conducted in accordance with this policy, The Code, and in compliance with applicable laws.

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During the investigation, steps will be taken to avoid acting on incorrect or unsupported accusations, where appropriate or required, alerting suspected individuals that an investigation is underway, or making statements that could adversely affect the Company or employees. The investigation will be carried out without regard to the suspected individual’s position or relationship with the Company.

Disciplinary action may result from any substantiated breach of The Code or any of the Company’s policies. Disciplinary action may include dismissal or referral to law enforcement agencies, when warranted by the facts. Disciplinary action will be taken in compliance with all applicable laws and without prejudice to subsequent prosecutions. The Company will comply with any legal process of the police or other authorities of competent jurisdiction, if in the opinion of counsel, the Company is required to comply with such process.

## 6. Questions or Clarifications Related to This Policy

The Audit & Finance Committee has designated the General Counsel to be responsible for the administration, interpretation, and application of this policy, and to handle all questions about this policy. If you believe that your concern or a concern raised against you has not been handled appropriately or that an investigation has not been performed correctly, please inform the General Counsel at:

Cassandra Payton

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