About EthicsPoint Reporting – General Reporting Security & Confidentiality Tips & Best Practices

About Speak Up Strong-Tie and EthicsPoint

What is Speak Up Strong-Tie and EthicsPoint?

Simpson Strong-Tie has partnered with NAVEX Global to create Speak Up Strong-Tie for employees. Speak Up Strong-Tie is a comprehensive and confidential reporting tool hosted on the NAVEX Global EthicsPoint platform. The reporting tool includes an outline portal and toll-free hotline that assists employees and managers in identifying and addressing fraud, abuse and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like Speak Up Strong-Tie (EthicsPoint)?

- Simpson Strong-Tie is committed to operating with the highest ethical standards and upholding the Secret Sauce and our Company Values (Barc's Nine Principles of Business). We believe that by creating open channels of communication, we are living our values and strengthening our culture.
- As a U.S. publicly traded company, Simpson Strong-Tie is required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- The Speak Up Strong-Tie online portal/hotline is another way for employees to confidentially and anonymously Speak Up and complements our other efforts to foster a culture of integrity and ethical decision making.

Reporting – General

May I report using either the internet or the telephone?

Yes. With Speak Up Strong-Tie, you have the ability to file a confidential, anonymous report by using the online web portal or by calling the toll-free hotline.

What type of situations should I report?

The Speak Up Strong-Tie reporting tool is designed as another way for you to confidentially and anonymously Speak Up, and can be used to report any concerns around misconduct and breaches of the Company's Code of Business Conduct and Ethics (The Code), or other concerns you may have. If I see a violation, shouldn't I just report it to my manager, supervisor, or Human Resources and let them deal with it?

When you observe some behavior that you believe violates The Code, we encourage you to report it. Ideally, you should bring any concerns forward to your direct manager and/or supervisor, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that Simpson Strong-Tie has partnered with EthicsPoint to create Speak Up Strong-Tie. We would rather you report your concern anonymously and confidentially rather than keeping the information to yourself.

Why should I report what I know? What's in it for me?

At Simpson Strong-Tie, 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. This responsibility comes with the commitment of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together and Speaking Up, we can live our values, protect our Company and strengthen our culture.

Does management really want me to report?

Yes. In fact, we need and want you to Speak Up about your concerns. You know what is going on in our company — both the good and the bad. You may have initial knowledge of an activity that may be cause for concern. Your report can minimize the potential negative impact on the Company and our people. By Speaking Up, you may help identify issues that can improve our culture and the Company's performance.

Where do these reports go? Who can access them?

Speak Up Strong-Tie reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific (and limited) individuals within the company or on our Company's Board of Directors based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence. Initially, these reports are shared jointly with The Vice President of HR and the Senior Vice President of Legal who are charged with evaluating the report and assigning it to the appropriate person for follow up. In the off chance that the report involves both of these individuals, the

report will be sent directly to the Chair of the Nominating and Governance Committee of our Company's Board of Directors.

Isn't this reporting tool an example of someone watching over me?

Speak Up Strong-Tie is intended to be a positive aspect of our overall Speak Up philosophy by providing an alternative way to confidentially and anonymously raise concerns. Employees who Speak Up and make their concerns known help the Company thrive by identifying issues and providing opportunities to adapt, innovate, improve and/or avoid costly mistakes. Our success depends on our employees informing the Company if something is not right, so we can fix it. We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting experience. And, we continue to train and guide those individuals who receive these reports in ways to Listen Up and follow up in a manner that respects all parties involved.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with, and because of that, won't this log identify me as a report originator?

Speak Up Strong-Tie is hosted by EthicsPoint, which does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity. If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an internet café, public library, a friend's house, etc.) through the Speak Up Strong-Tie secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours. You also have the option to call the toll-free hotline, which is available 24 hours a day, 365 days a year.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any internet portal will remain secure and anonymous. An internet portal never identifies a visitor by screen name and the EthicsPoint system strips away internet addresses so that anonymity is totally maintained. In addition, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

Speak Up Strong-Tie, hosted by EthicsPoint, is designed to protect your anonymity. However, if you wish to remain anonymous, you — as a reporting party — need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

Is the toll-free telephone hotline confidential and anonymous too?

Yes. When you call, you will be asked to provide the same information that you would provide in an internet/web-based report and a third-party interviewer will type your responses into the Speak Up Strong-Tie web portal. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reportingit?

Our Company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the Company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, we strongly encourage you to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

If something does look or feel right, Speak Up and raise your question by filing a report. Speak Up Strong-Tie can help you prepare and raise your concerns so it can be properly understood. We'd rather you raise a question that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my supervisor or other managers are involved in a violation? Won't they get the report and start a cover-up?

No. The Speak Up Strong-Tie tool and report distribution are designed so that implicated parties are <u>not</u> notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the Company has further questions for me concerning my report?

When you file a report using the Speak Up Strong-Tie web portal or through the hotline call center, you receive a unique user name and are asked to choose a password. You can return to Speak Up Strong-Tie again either by internet or telephone and access the original report so you can add more details. A Company representative may also ask you to answer additional questions and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the Company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Is all of the follow-up correspondence from the initial report secure and confidential?

All Speak Up Strong-Tie correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Can I still file a report if I don't have access to the internet?

You can file a Speak Up Strong-Tie report from any computer that has access to the internet. You can file from home. Many public locations, including public libraries, have computers with internet connections. If you don't have access to or are uncomfortable using a computer, you can call the toll-free hotline, which is available 24 hours a day, 365 days a year.