

The AZEK Company Inc.

Code of Conduct and Ethics



As Amended, Effective June 12, 2020

The Board of Directors (the “Board”) of The AZEK Company Inc. (together with its subsidiaries, “AZEK” or the “Company”) has adopted the following Code of Conduct and Ethics (“Code”) to apply to AZEK’s directors, officers and team members, in each case as indicated herein. While no code or policy can anticipate every situation that may arise, this Code is intended to direct directors, officers and team members on areas of ethical risk, provide guidance on recognizing and dealing with ethical issues, including the ethical handling of conflicts of interest, provide mechanisms to report unethical conduct, foster a culture of honesty and accountability, deter unethical behavior, promote compliance with applicable laws and governmental rules and regulations, ensure the protection of AZEK’s legitimate business interests, including corporate opportunities, assets and confidential information and promote fair and accurate disclosure and financial reporting. We also expect AZEK’s business partners, including vendors, agents and consultants, to act in a way that is consistent with the letter and spirit of the Code when conducting business with or on behalf of us.

Principles

Each director, officer and team member is expected to adhere to a high standard of ethical conduct. AZEK’s good name depends on the way its directors, officers and team members conduct business and the way the public perceives that conduct. Unethical actions, or the appearance of unethical actions, are not acceptable. Directors, officers and team members are expected to be guided by the following principles in carrying out their responsibilities:

Our Officers and Team Members are Leaders who

- Take a leadership role, at any level, in modeling exemplary behavior in ethical business conduct.
- Ensure that every new or transferred team member receives a copy of the Code.
- Provide appropriate training for team members on business ethics issues.
- Monitor and ensure compliance with this core policy by team members and others who do business on behalf of the Company.
- Deal effectively with business ethics concerns that arise in the business units.
- Support protection from retaliation for team members who report or supply information about, or assist in, an investigation into a business conduct or ethics concern.
- Periodically certify compliance with this Code. Any false certification under any circumstances will face discipline up to and including termination of employment.

Employment Expectations

- We behave with integrity, which encompasses everything from valuing our team members to protecting the environment to accurate financial reporting.
- All team members participate in regular training to learn about the Company’s business conduct, ethics standards and expectations.

- AZEK team members are expected to demonstrate ethical leadership by raising questions and concerns about the right thing to do.
- As a team member, you do not only have a responsibility to behave ethically, but you are also obligated to report violations of which you become aware.
- Each team member is obligated to disclose his or her own conflicts of interest and any appearance of a conflict of interest.
- Personal conduct, unrelated to AZEK, is not AZEK's concern; unless such conduct impairs the team member's work performance or affects the reputation or other legitimate business interests of AZEK.

Conflicts of Interest. Except as described below, directors, officers and team members should not be, or appear to be, subject to conflicts of interest, or personal influences, interests or relationships that affect, or could have the perception of affecting, the judgment of a director, officer or team member in the performance of their duties with AZEK.

Compliance with Applicable Laws. AZEK's most important assets are our team members. Each team member has a genuine worth and deserves the respect and consideration of everyone.

Directors, officers and team members are expected to comply with all applicable laws, rules and regulations in the performance of their duties for AZEK. AZEK strictly prohibits discrimination or harassment against any team member because of the individual's gender, race, religion, age, nationality, mental or physical disability, sexual orientation, gender identity, marital status, pregnancy, veteran status, political opinion, social or ethnic origin or any other characteristic protected by applicable law.

Observance of Ethical Standards. Directors, officers and team members must adhere to high ethical standards in the performance of their duties for AZEK.

Conflict of Interest

Directors, officers and team members must avoid any conflict of interest between themselves and AZEK. Specifically, no director, officer, or team members shall make any investment, accept any position or benefits, participate in any transaction or business arrangement, or otherwise act in a manner that creates or appears to create a conflict of interest with AZEK (as defined below) unless such person makes full disclosure of all facts and circumstances to, and obtains the prior written approval of, the appropriate executive officer of AZEK and/or AZEK's Board.

A conflict of interest exists when an individual's private interest interferes, or appears to interfere, in any way with the interests of AZEK. A conflict of interest may arise when a director, officer or team member takes actions or has interests that may make it difficult to perform his or her work for AZEK objectively and effectively. Conflicts of interest also arise when a director, officer or team member, or a member of his or her family, receives improper personal benefits as a result of his or her position at

AZEK. Service to the Company should never be subordinated to personal gain and advantage. Conflicts of interest should, wherever possible, be avoided.

Potential conflicts of interest will be investigated and discipline will be considered on a case-by-case basis. Because of their nature, the consequences of an actual or perceived conflict of interest will depend on the facts and circumstances of the situation.

The following are examples of situations that should generally be avoided because they could create the perception of a conflict of interest. These examples are illustrative and should not be considered to be all-inclusive:

- Acceptance of a gift from a customer or vendor of a dollar value that goes beyond common courtesies usually associated with acceptable business practice. In general, any gift with a value in excess of \$25 should be considered non-nominal. Gift cards and cash gifts are never acceptable, and team members must refuse or return such gifts to vendors. Seek help from your leader if concerned about the appropriate way to return such gifts. ;
- Accepting an invitation to an entertainment or sporting event from a customer or vendor where the customer/vendor is not in attendance or no business was conducted; and
- Seeking or accepting outside employment with AZEK's customers, suppliers or competitors.

To minimize any appearance of impropriety, disclose any gifts to your immediate leader, and seek ways to share the gift with others. For example, share gifts of food with your team and those who sit around you. Consider donating a gift that cannot be shared to a local charity for use in a silent auction or raffle.

Team members must not accept any gifts from customers or vendors when the team member will have a role in a pending purchasing decision involving the customer/vendor and the acceptance of the gift may have undue influence or the perception of such on the decision.

Below are examples of situations that, because of their severity, would almost always be considered to be conflicts of interest. These situations, or situations of a similar nature, could result in discipline, up to and including termination of employment. These examples below are illustrative and should not be considered to be all-inclusive:

- Directly investing in other building products companies;
- Making certain investments in organizations that do business with AZEK (to the extent that the team member possesses non-public information or has influence over relevant purchasing or vendor selection decisions);

- Misusing AZEK's confidential information or the confidential information of AZEK's customers or suppliers for personal financial gain;
- Seeking reimbursement or payment from a vendor, supplier and/or customer for activities that directly relate to your duties in the company;
- Selling anything to AZEK or buying anything from AZEK, except on the same terms and conditions as unrelated third parties are permitted to so sell or purchase;
- Making or approving improper payments to any government or government officials;
- Accepting or making payments in violation of the Foreign Corrupt Practices Act; or
- Receiving loans or guarantees of obligations from AZEK.

For More Information. Good judgment and discretion are mandatory in conflict of interest situations. If you encounter situations similar to the ones above, or question whether a situation could be a conflict of interest, contact your immediate leader, human resources or the AZEK Legal Department. Please review AZEK's Competition and Fair Dealing section below for additional information regarding interactions with competitors.

Notwithstanding the foregoing, this Code does not apply to interests and relationships permitted under, or approved in accordance with the terms of, the Company's certificate of incorporation or bylaws.

Cooperation

All officers and team members are required to cooperate fully in any investigation and are asked to keep their knowledge of and participation in such investigation confidential to help safeguard the integrity of the investigation, protect witnesses and secure relevant evidence.

Corporate Opportunities

Directors, officers and team members owe a duty to AZEK to advance its legitimate interests when the opportunity to do so arises, and are prohibited from: (a) taking for themselves personally (or directing to a third party) opportunities that are discovered through the use of AZEK's property, information or position; (b) using AZEK's property, information or position for personal gain; or (c) competing with AZEK for business opportunities while employed by AZEK.

Sometimes there are both personal and Company benefits in certain activities. Directors, officers and team members who intend to make use of AZEK property or services in a manner not solely for the benefit of AZEK should consult beforehand with the AZEK Legal Department.

Notwithstanding the foregoing, this Code does not apply to certain opportunities in which certain persons are permitted to participate under, or receive approval for in accordance with the terms of, the Company's certificate of incorporation or bylaws.

Competition and Fair Dealing

All directors, officers and team members should endeavor to deal fairly with each other and with AZEK's customers, suppliers and competitors and should not take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

AZEK prides itself on leading the marketplace by innovating, performing at the highest levels and competing vigorously. It is critical to our business and our reputation that we compete fairly. We do not seek competitive advantages through illegal or unethical business practices. This means:

- We comply with fair competition — or “antitrust” — laws that promote market place fairness. These laws prohibit restraints on trade, including agreements among competitors to fix prices, to manipulate the volume or availability of products, to allocate territories, markets or products, or to boycott particular suppliers or customers. In many circumstances, it is also illegal to offer discriminatory pricing to competing customers. Because penalties for anticompetitive conduct can be very severe, including huge individual and corporate fines and prison sentences, and because the rules in this area are so complex, the AZEK Legal Department must assist with all antitrust issues.
- We gather and use competitors' information legally and ethically. We can seek out and rely on publicly available, non-confidential information about competitors' business practices. It is improper to use others' proprietary competitive information. If you believe that you have received a competitor's confidential, proprietary information, even by accident or mistake, inform the AZEK Legal Department immediately.

Confidentiality and Insider Trading

In carrying out AZEK's business, directors, officers and team members often learn confidential information about AZEK or its customers or suppliers. Directors, officers and team members shall maintain the confidentiality of information entrusted to them by AZEK and any other confidential information about AZEK, its business, customers or suppliers that comes to them, from whatever source, except when disclosure is authorized or legally mandated. For purposes of this paragraph, “confidential information” refers to all non-public information that could be of use to competitors, or harmful to AZEK or its customers, if disclosed. Such information includes, but is not limited to, trade secrets, client lists, sales data, computer records, software, research or development projects or results, tests, passwords and/or any other non-public proprietary company information. Nothing in this policy is intended to prevent a team member from

engaging in concerted activity protected by law or to interfere with, restrain or prevent team member communications regarding wages, hours or other terms and conditions of employment. Team members have the right to engage in or refrain from such activities during non-working time without influence or interference from management.

AZEK prohibits the trading in securities of any issuer, including AZEK and its customers or suppliers, while in possession of confidential information regarding the issuer or passing such information to others, including friends or family. The consequences of prohibited insider trading violations can be severe, including immediate dismissal for cause, civil or criminal penalties for you, the tippee(s), and AZEK, and irreparable damage to our reputation and public trust. For more information, please refer to AZEK's Insider Trading Policy.

Protection and Use of Company Assets

Directors, officers and team members should protect AZEK's assets and ensure their efficient use for legitimate business purposes only. Theft, carelessness and waste have a direct impact on AZEK's profitability. The use of AZEK's funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

Equal Employment Opportunity, Non-Discrimination and Anti-Harassment

AZEK believes in respectful, professional conduct in the workplace and fosters a diverse and inclusive work environment. The Company follows equal employment opportunities principles and complies with the letter and spirit of the laws regarding fair employment practices and non-discrimination and does not tolerate discrimination, harassment, violence or threatening behavior of any kind.

Our policy of non-discrimination applies to all aspects of employment, including hiring, salary, advancement, benefits, discipline, termination or retirement, on the basis of gender, race, religion, age, nationality, mental or physical disability, sexual orientation, gender identity, marital status, pregnancy, veteran status, political opinion, social or ethnic origin or any other characteristic protected by applicable law.

No team member shall be subject to physical, sexual, psychological or verbal harassment or abuse. Under most circumstances, harassment refers to the type of conduct that is pervasive, repetitive, and sufficiently severe to alter the conditions of an employee's employment. Among the types of conduct prohibited by this Code are epithets, slurs, jokes, negative stereotyping, intimidating acts, unwelcoming sexual advances, requests for sexual acts or favors, or other verbal or physical conduct of a sexual nature, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. The company prohibits that conduct in the workplace, even if the conduct is not sufficiently severe or pervasive to constitute unlawful harassment.

Every team member must avoid any conduct that reasonably could be interpreted as discrimination or harassment under this Code, even if such conduct was not intended as offensive. Team members with questions or concerns about any type of discrimination

or harassment in the workplace are encouraged to speak to their supervisor, any member of management or Human Resources regarding concerns they may have so appropriate action may be taken without fear of retaliation. For more information, please see *Compliance, Reporting and Accountability* and *Ethics Hotline* below.

Health and Safety

AZEK is committed to providing a clean, safe and healthy work environment for all employees. Our health and safety policies and practices include an employee training and competency development program to train, verify and encourage compliance with health and safety procedures and regulations. We conduct inspections and maintenance in line with Company policies and practices, as well as applicable laws, in order to prevent accidents. All team members must fully comply with all applicable workplace conditions, safety and environmental laws, rules, regulations and standards.

Protecting the Environment

Environmental sustainability is one of our core strategic pillars. We embrace our responsibility to minimize the environmental impact of our operating platform across the value chain from product design, to raw material sourcing and manufacturing, and we increasingly utilize plastic waste, recycled wood and scrap in our products. AZEK continuously seeks ways in which we can further advance our sustainability strategies and expects everyone to positively contribute to this effort.

Conducting International Business

AZEK conducts business around the world. Many of the countries where AZEK conducts business have laws and regulations that are significantly different from those of the United States. Officers and team members are responsible for knowing and complying with these laws.

Officers and team members must also take care to understand and respect the cultures and customs of the people that we work with in these countries. AZEK respects human rights and forbids the use of forced labor, debt bondage, slavery, human trafficking, child labor and physically abusive disciplinary practices.

Officers and team members that work in the international arena must be aware of and comply with the U.S. Foreign Corrupt Practices Act (“FCPA”) and AZEK’s Anti-Bribery Policy. The FCPA prohibits giving anything of value to officials of foreign governments with the intent to wrongfully influence the official to use his or her position in order to assist in obtaining or retaining business or gaining an improper advantage. AZEK’s officers, team members, agents, consultants and other business partners are not permitted to engage in bribery, kickbacks, payoffs or other corrupt business practices. Any questions with respect to the FCPA or AZEK’s Anti-Bribery Policy should be addressed to AZEK’s Legal Department.

No officer or team member (regardless of location) may conduct business directly or indirectly with any company or individual based or residing in certain prohibited

countries. Specifically, transactions with countries subject to U.S. trade embargos are strictly prohibited. “Prohibited Countries” include: Crimea – Region of Ukraine, Cuba, Iran, North Korea, Sudan and Syria. Prohibition extends to both direct and indirect transactions with the Prohibited Countries. Thus, no team member may assist in or otherwise support a transaction with a Prohibited Country that the team member could not engage in directly. If U.S. law conflicts with local trade law, U.S. law may apply. Always consult with the AZEK Legal Department for guidance on this subject. AZEK also cannot conduct business with parties listed on government trade exclusion lists, including the U.S. Denied Persons, Entity and Specially Designated Nationals List. AZEK is prohibited from participating in boycotts that are not sanctioned by the U.S. government—this includes agreements to discriminate and refusals to do business with certain countries or companies blacklisted by other governments. To ensure compliance with anti-boycott laws, always have the AZEK Legal Department review agreements and transactions that contain potential boycott-related language.

It is AZEK’s policy to fully comply with all applicable U.S. export, customs and trade controls and regulations, licensing requirements and other relevant U.S. and international laws.

AZEK’s Legal Department is available to assist you as the need arises to facilitate compliance with these requirements.

Accuracy of Financial Reports and Other Public Communications

As a public company, AZEK is subject to various securities laws, regulations and reporting obligations. Both federal law and our policies require the disclosure of accurate and complete information regarding AZEK’s business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage AZEK and result in legal liability.

Our customers, consumers and investors deserve accurate, clear, complete and consistent communications about AZEK. To be sure that we comply with the law and protect our interests, only officers who are specifically trained and authorized to do so should represent AZEK to the public, including investors, or the media.

AZEK’s principal financial officers and other team members working in the accounting department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These team members must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

Political Contributions

AZEK complies with all laws governing the Company’s participation in political contributions. The Company’s funds or assets may not be contributed, directly or indirectly, to any political party, committee or candidate, or the holder of any federal, state or local government office within the United States. In jurisdictions outside of the

United States where political contributions by corporations are lawful, a political contribution may be made only upon the prior specific written approval of the Company's Chief Legal Officer.

Compliance, Reporting and Accountability

Each director, officer, manager and associate has an obligation to comply with all laws (including insider trading laws), rules, and regulations applicable to AZEK and with the provisions of this Code.

Any director, officer or team member who becomes aware of any existing or potential violation of this Code by a person other than a director or executive officer is required to notify (i) the AZEK Legal Department; (ii) an executive with supervisory responsibility over the individual involved in the violation; or (iii) the independent Ethics Hotline. Any director, officer or team member who becomes aware of any existing or potential violation of this Code by a director or executive officer is required to notify the Audit Committee of AZEK's Board or the Ethics Hotline. Failure to do so is itself a violation of this Code. For more information, please see the *Ethics Hotline* section below.

Any questions relating to how this Code should be interpreted or applied should be addressed to AZEK's Legal Department. A director, officer or team member who is unsure of whether a situation violates this Code should discuss the situation with AZEK's Legal Department to prevent possible misunderstandings and embarrassment at a later date.

The Company does not tolerate acts of retaliation against any director, officer or team member who makes a good faith report of known or suspected acts of misconduct or other violations of this Code. The Board and AZEK's Legal Department shall take all action they consider appropriate to investigate any violations reported to them. The Board shall determine, or shall designate appropriate persons to determine, appropriate action in response to violations of this Code.

Ethics Hotline

AlertLine is a service of Global Compliance that is specifically designed to assist companies in complying with section 301(4) of the Sarbanes Oxley Act of 2002. This law established the ability for employees to confidentially report problems regarding accounting, internal accounting control and auditing.

Additionally, AlertLine offers its services to clients to act as a resource to report other employment-related concerns such as harassment or discrimination. This is not, however, a general complaint hotline, and the effectiveness of this program could be impaired if misused.

AZEK encourages open and candid discussion of team member concerns and work problems, including, but not limited to, issues of harassment, discrimination and safety without fear of retaliation. AZEK seeks to foster an atmosphere in which team members can talk freely with their supervisor, any member of management or Human

Resources regarding concerns they may have so appropriate action may be taken. Should this open discussion not lead to resolution, a team member may any violation of this Code via AlertLine.

- Each caller who assists the company by providing further contact information will continue to remain completely anonymous;
- All allegations received by the hotline will be carefully reviewed in order to determine the most appropriate course of action; and
- There will be absolutely no retaliation or retribution for any member reporting a concern in good faith.

In order to report a concern, you may contact Global Compliance directly at 877-874-8416 or by logging into their website at www.alertline.com.

Waivers of the Code

From time to time, the Company may waive some provisions of this Code. Waivers of this Code for non-executive officers or team members may be made only by the Chief Executive Officer, Chief Financial Officer or Chief Legal Officer. Any waiver of this Code for directors or executive officers may be made only by our Board or an appropriate committee of our Board and will be disclosed to the public as required by applicable law or exchange listing requirements.

Website Posting and Disclosure Requirements

AZEK will make this Code available on its website. In addition, AZEK will disclose in its annual proxy statement that this Code is available on its website and provide the website address.

Administration and Implementation

AZEK's Board of Directors has oversight responsibility for this Code. The Nominating and Corporate Governance Committee of the Board will periodically review and assess the appropriateness of the principles and polices herein and make recommendations to the Board, as appropriate. AZEK's Chief Legal Officer is responsible for the implementation of this Code.