

THE AZEK COMPANY INC.

SUPPLIER CODE OF CONDUCT

The AZEK Company Inc. (“AZEK”) is an industry-leading designer and manufacturer of beautiful, low-maintenance and environmentally sustainable products focused on the highly attractive, fast-growing Outdoor Living market. We have created an operating platform that is centered around sustainability, one of our core strategic pillars, which extends across our value chain from product design to raw material sourcing and manufacturing, and we increasingly utilize plastic waste, recycled wood and scrap in our products. We continuously drive sustainability in products and solutions, combining economic success, social responsibility and environmental protection in our business operations.

One of our core values is to “always do the right thing.” We make decisions according to what is right, not what is cheapest, fastest or easiest, and we strive to always operate with integrity, transparency and with the customer in mind. In furtherance of that value, we are focused on sustainability across our operations and have adopted strategies to enable us to meet the growing demand for environmentally-friendly products. We want to partner with our suppliers to further develop their sustainability performance in our supply chain. Further, we seek to contribute to the economic growth of a diverse business community by developing relationships with qualified, diverse businesses that meet our high standards for quality and cost effectiveness.

We recognize and respect the freedom of employees to exercise their lawful rights of free association and collective bargaining across our operations and supply chain. We believe that workers have the right to form, join or not join trade unions or other organizations of their choosing and collectively bargain without fear of discrimination, retaliation, harassment or intimidation.

We expect our suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards (ESG standards). We also expect our suppliers to use their best efforts to implement these standards with their suppliers and subcontractors.

We particularly expect you, as our supplier, to support, embrace and enact the following ESG standards, which are based on the seventeen United Nations Sustainable Development Goals, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization Declaration on Fundamental Principles and Rights at Work:

Environment

- You comply with all applicable environmental, health and safety regulations.
- You promote the safe and environmentally-sound development, manufacturing,

transport, use and disposal of your products.

- You ensure by using appropriate management systems that product quality and safety meet the applicable requirements.
- You protect your employees' and neighbors' life and health, as well as the general public at large against hazards inherent in your processes and products.
- You use resources efficiently, apply energy-efficient and environmentally-friendly technologies and reduce waste, as well as air, water and soil emissions.
- You minimize your negative impact on biodiversity, climate change and water scarcity.

Social

- You support the protection of nationally and internationally proclaimed human rights, fight forced labor (including modern slavery and human trafficking) and child labor.
- You treat your employees with respect and provide a workplace free of harassment or abuse of any kind, harsh and inhumane treatment, unlawful practices or discrimination.
- You recognize and respect across your operations the freedom of employees to exercise their lawful rights of free association, including the right to form, join or not join trade unions or other organizations of their choosing and collectively bargain without fear of discrimination, retaliation, harassment or intimidation.
- You enable your employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.
- You comply with minimum wages and working hours in accordance with local laws and ensure compensation of a living wage according to local living conditions.
- You perform appropriate and sufficient diligence on your own supply chain to ensure that you do not contribute to transactions in conflict minerals.

Governance

- You abide by all applicable national and international trade laws and regulations, including, but not limited to, antitrust, trade controls and sanction regimes.
- You consider business integrity as the basis of business relationships.
- You prohibit all types of bribery, corruption and money laundering.
- You forbid gifts to private or public officials that aim to influence business decisions or otherwise encourage them to act contrary to their obligations.
- You respect the privacy and confidential information of all your employees and business partners as well as protect data and intellectual property from misuse.
- You implement an appropriate compliance management system, which facilitates

compliance with applicable laws, regulations and standards.

It is The AZEK Company's goal to create and drive a sustainable supply chain. Ensuring the principles of sustainable development are present in our supply chain is important to us. You may acknowledge the principles stated above or demonstrate your commitment via compliance with your own code of conduct or company policies that embrace these standards. In addition, as an important supplier, we may ask you to assess and document your sustainability and environmental initiatives from time to time in the form of a supplier sustainability survey.

The AZEK Company Inc. reserves the right to conduct audits or assessments, including requesting you to certify compliance with this code of conduct and applicable laws, to ensure your compliance and will take appropriate steps regarding our relationship with you if there is a reason for concern. In addition to any audits or assessments AZEK conducts on any particular supplier(s), AZEK also regularly screens its suppliers for sanctions and other violations, and AZEK may contact you to discuss any concerns raised by such screening procedures. The AZEK Company Inc. reserves the right to discontinue any relationship for non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these standards.

This policy is to be annually reviewed and revised as needed and has been approved by AZEK's Board of Directors. AZEK's Chief Legal Officer is responsible for the implementation of this policy.