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**Apogee Enterprises, Inc.**  
**Supplier Code of Conduct**

<b>Policy Number:</b>	PROC 903	<b>Revision Number:</b>	1	<b>Effective Date:</b>	05/12/2023
<b>Supplier Code of Conduct</b>	<b>Issue Date:</b>	05/12/2023	<b>Supersedes:</b>	N/A	
<b>Functional Owner:</b>	Zach Willis, Senior Manager Procurement Analytics				
<b>Approved By:</b>	Greg Sachs, CPO				

**TITLE:** Supplier Code of Conduct

**POLICY:**

To establish Apogee’s expectations and requirements for suppliers.

**PURPOSE:**

Apogee Enterprises and its subsidiaries and affiliates (collectively, “Apogee” or the “Company”) are committed to conducting business in an ethical and responsible manner and expects its suppliers to do the same. Developed to align with Apogee’s [Code of Business Ethics and Conduct](#), [Conflict Minerals Policy](#), and Human Rights Statement, this Supplier Code of Conduct (the “Supplier Code”) sets forth the Company’s expectations and criteria for consideration of suppliers. Apogee defines “suppliers” as any organization that directly provides goods or services to the Company. This Supplier Code shall be periodically reviewed by Apogee and may be amended or modified at the discretion of the Company.

**SCOPE:**

This Policy applies to all suppliers of Apogee.

**DEFINITIONS:**

N/A

**REQUIREMENTS AND ILLUSTRATIONS:**

**Legal and Regulatory Compliance**

Apogee requires that suppliers conduct their business in compliance with all laws, rules,



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and regulations, including those that prohibit unfair or illegal trade practices, bribery, corruption, unfair pricing, or misrepresentation of products or services. This also extends to all applicable international, federal, state, provincial, and local legislation, laws, rules, and regulations on human rights, conflict minerals, labor, and the environment.

### **Human Rights**

Suppliers are expected to respect and protect human rights across their operations. Apogee strictly prohibits and is opposed to the use of child labor, forced labor, slavery, or any other oppressive labor conditions, as well as any form of human trafficking. Apogee will not knowingly do business with any supplier which engages in these practices and reserves the right to take corrective actions, up to and including termination of the relationship.

### **Nondiscrimination & Working Conditions**

Apogee is committed to providing equal employment opportunities and strictly prohibits any discrimination or harassment. Suppliers are expected to comply with all applicable employment, labor, and health and safety laws and regulations, including but not limited to: equal opportunity and non-discrimination in hiring and in the workplace; minimum wage laws; freedom of association and collective bargaining; and work hour laws. In addition, suppliers are expected to provide a work environment free of all forms of inhumane treatment, abuse, and corporal punishment.

### **Conflicts of Interest, Gifts, & Gratuities**

Our suppliers should know that Apogee employees are prohibited from directly or indirectly giving, offering, requesting, or accepting a gift or gratuity from an employee or other representative of any person or firm doing or seeking to do business with the Company, in connection with a transaction or proceeding involving the Company. Gifts and gratuities that are not connected with such a transaction or proceeding are acceptable only if they meet the rules set forth in the Company's Code of Business Ethics & Conduct. Employees may not offer or accept cash or cash equivalents under any circumstances.

Apogee's suppliers are expected to respect the limitations placed on the Company's employees, as stated above, and refrain from putting them in an uncomfortable situation by offering them gifts or other favors that they may not accept.



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## **Conflict Minerals**

Apogee is committed to complying with the U.S. Securities and Exchange Commission rule requiring companies to disclose their use of gold, tin and other “conflict minerals” from the Democratic Republic of the Congo (“DRC”) and adjoining countries. Apogee’s suppliers are required to comply with the Company’s [Conflict Minerals Policy](#) and are expected to make all reasonable efforts to support the Company’s commitment to sourcing responsibly from the DRC region. For any questions regarding Apogee’s Conflict Minerals Policy or to report any concerns regarding the circumstances of mineral extraction, trade, handling, and export in a conflict-affected and high-risk area, email [conflictminerals@apog.com](mailto:conflictminerals@apog.com). Additional information and resources can be found on our website at [www.apog.com](http://www.apog.com) by selecting “Investors” and “Governance”.

## **Environment**

Apogee strives to conduct business in an environmentally responsible manner and continues to increase environmental awareness throughout its operations, which includes the role of suppliers. We expect our suppliers will comply with all applicable environmental laws and regulations. Suppliers are expected to deliver goods and services in a manner that demonstrates respect for the environment and actively manages risks. This can include minimizing harmful environmental impacts, and conserving energy and natural resources to the extent practicable.

## **Communication and Monitoring**

To meet the Company’s expectations, suppliers should educate their leadership and employees, to understand and comply with the expectations established in this Supplier Code. Apogee maintains the right to engage with suppliers to monitor and ensure adherence to this Supplier Code. Non-compliance can affect the business relationship between Apogee and the supplier and, as a result, may require a commitment by the supplier to implement a corrective action plan to return the supplier to compliance with this Supplier Code. The Company may also elect, at its discretion, to terminate the relationship.



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## **Reporting**

Reports of violations to this Policy can be reported on a confidential and anonymous basis to in one of these ways:

Online:        [www.apog.ethicspoint.com](http://www.apog.ethicspoint.com) (enter the organization name of "Apogee")  
(worldwide)

By Telephone:        Apogee Code of Conduct Hotline—800.441.6164 (toll-free in the  
U.S. and Canada)

In Writing:        Apogee Enterprises, Inc.  
4400 West 78th Street  
Suite 520  
Minneapolis, Minnesota 55435 USA Attention: General Counsel

By Email:        [ApogeeLegal@apog.com](mailto:ApogeeLegal@apog.com)  
[ApogeeCompliance@apog.com](mailto:ApogeeCompliance@apog.com)

For any questions regarding this Supplier Code or the expectations it sets forth, you can contact the Apogee Procurement Office at [procurement@apog.com](mailto:procurement@apog.com).

## **TRAINING:**

Training on this policy is a self-study, with systemic signoff for evidence of training completion (I.e.: Workday or another system that tracks this)

## **COMPLIANCE AND ENFORCEMENT:**

Any Corporate Policy created, revised, or published in a manner inconsistent with this policy shall be updated to be consistent with this policy

## **POLICY MANAGEMENT:**

Upon adoption, the Senior Manager Procurement Analytics shall be the Function Policy Owner for the management of this Policy.



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**EXCLUSIONS:**

N/A

**COMPLIANCE PROGRAM OR CORPORATE POLICY REFERENCES:**

Code of Business Ethics & Conduct, Conflict Minerals Policy, Human Rights Policy