



Supply Chain Transparency Disclosure

In the building products industry, it is difficult to assure that the original production of raw materials is done responsibly, because these processes occur so far up our supply chain and, therefore, are far outside of JELD-WEN's direct control. Nonetheless, we are actively engaging with our stakeholders and direct suppliers to address the risk of human rights abuses, including forced labor and human trafficking, deep in our supply chain.

JELD-WEN requires all of its suppliers to comply with the applicable laws and regulations of the United States, and those of the respective country of manufacture or exportation. In accordance with the California Transparency in Supply Chains Act (SB 657), JELD-WEN's efforts to address human trafficking and slavery in the direct supply chain are described below.

Verification

JELD-WEN's sourcing and legal executives meet on an annual basis, and informally as needed, to assess the risk of human trafficking and slavery in our supply chains and to assess whether our policies and procedures appropriately address those risks.

Audits

Our preliminary assessment is based upon geography, the commodity purchased, the level of manual labor required for part/assembly production, the supplier's ownership structure, supplier quality performance and the nature of the business transaction. This risk assessment is performed by JELD-WEN with input from external stakeholders. JELD-WEN will not tolerate, and will investigate, any reports alleging human trafficking and forced labor in the supply chain. Action is taken against any supplier for noncompliance, resulting in possible termination of the business relationship.

Certification

JELD-WEN's purchase orders and master contracts require suppliers to certify compliance with applicable local labor laws, and to our prohibition of forced labor, child labor and physical disciplinary abuse. We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance is not addressed in a timely manner.

Internal Accountability

JELD-WEN's directors and employees adhere to a code of business conduct and ethics that informs them about the requirements of supply chain transparency with respect to forced labor, child labor and human trafficking. Employees who suspect a human trafficking violation are required to report this activity to JELD-WEN's legal department or to JELD-WEN's confidential ethics hotline.

Training

The issue of human trafficking is addressed annually in the code of conduct or general legal compliance training required of more than 4,000 JELD-WEN managers and administrative staff members. Employees responsible for supply chain-related decisions at JELD-WEN receive more detailed training on identifying and addressing human trafficking and slavery in our supply chain, and emphasizing the role of our buyers in responsible decision-making.