



# The MasterBrand Way

## Our Code of Ethics



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# CEO Message

**“Do the right thing” isn’t just a phrase – it’s the way we operate every single day at MasterBrand. We act with integrity, honesty, and transparency in everything we do and every interaction we have, from the plant floor to the back office. In doing so, we strive to be a best place to work for our associates, a trusted partner to our customers, and a company that delivers a world-class experience to our consumers.**

MasterBrand’s Ethics and Compliance Program, **Always Accountable**, reflects our shared commitment to act with integrity in every decision we make and in every corner of our business. As a key pillar of our program, this Code of Ethics serves as a guide for making ethical business decisions. We are all accountable for understanding and complying with the Code, and for encouraging ethical conduct in all of our interactions with our fellow associates, customers, and consumers.

Speak up if you observe someone acting outside the Code’s guidelines, as the actions of one reflect on the actions of us all. We should always embody the spirit of integrity, meaning we do the right thing at all times, no matter who is watching.

Please take the time to read the Code and become acquainted with our standards. Don’t hesitate to contact the resources listed in the Code if you have questions or need additional guidance. We will not tolerate retaliation against anyone who raises a concern in good faith or asks questions. We always reiterate, “See something, say something” regarding our safety practices, but it absolutely applies to ethical situations, as well.

Thank you for all you do each day to uphold our standards and values. Your commitment to an ethical workplace contributes to our continued success and allows us to keep Building Great Experiences Together.

Warmest regards,

**R. David Banyard, Jr.**

*President & CEO, MasterBrand*



# Working with Integrity

At MasterBrand, we are united by our shared purpose of building great experiences together. This commitment shapes how we work, how we lead, and how we support one another.

Our MBC Culture – Make the Team Better, Be Bold, and Champion Improvement – guides how we show up every day and how we pursue our goal of delighting customers by building upon our rich history and continually improving how we operate.

## How We Work Matters

Our culture is the foundation of how we operate and how we treat one another. It influences the decisions we make, the promises we keep, and the standards we hold ourselves to across the company. Through our culture, every associate plays a role in strengthening our teams, driving the business forward, and continuously seeking improvement.

While the MasterBrand Way reflects our broader cultural foundation and how we align to grow as an organization, our day-to-day expectations come to life through the three behaviors that help us keep each other safe, deliver high quality, and act with integrity: **Always Aware**, **Always Care**, and **Always Accountable**.

**Always Accountable** is central to our compliance and ethics efforts. It reinforces our responsibility to act with integrity, follow the law, and comply with our Code and policies. Each of us is empowered to pause, ask questions, raise concerns, and speak up when something does not feel right. Accountability protects our culture, our colleagues, and our company.



## How We Use This Code

This Code is a practical resource you can rely on when you are not sure what to do, a guide to help you make good choices, and a reminder of the rules that apply to all of us. This Code doesn't replace your judgment. It sharpens it and gives you useful questions to ask and points you to people who can help. Use this Code when you need to:

- clarify the right next step;
- check what our standards require;
- find the right policy or resource; and
- speak up or get guidance.



## Who Must Follow It

This Code applies to everyone who works for or represents MasterBrand. This includes all MasterBrand associates and members of our Board of Directors. This Code also applies to anyone acting for MasterBrand, such as temporary workers, contractors, and other partners who represent our Company.

When the Code is not followed, disciplinary action may be taken, including terminating employment. Certain violations may also require MasterBrand to refer matters to law enforcement for investigation or prosecution.



## Where it Applies

The Code applies whenever you are representing MasterBrand. Whether you are in one of our facilities, in the field, in showrooms, at customer sites, or anywhere else where your actions reflect MasterBrand, you are responsible for following this Code.



# Together, We Set the Standard

It takes each of us to do business the right way. Every MasterBrand associate is responsible for doing their part to help our company operate honestly and ethically. This shared responsibility is reflected in our commitment to **Always Accountable**. It is how we pause, ask questions, and speak up when something does not feel right.

## Our Shared Responsibilities

All MasterBrand associates can contribute positively to our culture. We are all responsible for making sure that our actions are ethical, responsible, and sustainable. We must all:



**Be Respectful:** Treat others with respect and demonstrate MasterBrand's commitment to doing what's right in our daily work and decisions.



**Stay Informed:** Make sure you understand our Code and the policies, laws, and regulations that apply to your work.



**Make Good Choices:** If something feels wrong or close to breaking the rules, don't do it. If you're not sure what the right choice is, ask for help before you act.



**Speak Up:** If you see a problem, tell us about it. You can find more details in the Speak Up section of the Code and in the Speak Up Pathways boxes.

## Additional Ethics Obligations for Certain Leaders

Because of their roles and responsibilities, the Company's CEO and Senior Financial Officers are subject to an additional [Code of Ethics for Senior Financial Officers](#). This Code addresses financial reporting, public disclosures, conflicts of interest, and accurate accounting, and reflects the heightened expectations that apply to these positions.

## Our Leadership Expectations

Leaders set the tone. Every manager, supervisor, and executive is responsible for creating an environment where people understand expectations and feel safe to speak up.



**Lead by Example:** To your team, you are the voice and example of MasterBrand. Lead by living our values consistently. Every interaction matters and your team will follow your lead and look to you for guidance.



**Promote Ethics:** Talk regularly about ethics and compliance. Ensure everyone understands that doing what is right takes priority over achieving business targets.



**Make It Safe to Speak Up:** Listen when your team speaks. Encourage them to ask questions and raise concerns. Let them know they can always come to you, even with bad news. Make it clear that all concerns are taken seriously at MasterBrand and that retaliation is never tolerated.



**Listen Carefully:** When someone shares a concern, pay attention. Take all concerns seriously and escalate issues when necessary.



# How We Make Good Choices

At MasterBrand, **Integrity in Action** is a team effort. All MasterBrand Associates are responsible – and empowered – to make decisions that align with our values. This decision model reflects the MasterBrand culture and our commitment to acting with integrity. **Always Accountable** means taking the time to pause, ask questions, and speak up when something does not feel right. Use this decision model when you face a difficult decision.

Step  
1

## Pause

Not every situation is black and white. If something doesn't feel quite right, don't rush.

Step  
2

## Think: Ask yourself these questions:

- a. **Culture Check:** Does this align with MasterBrand's purpose and culture?
- b. **Rules Check:** Is it legal and consistent with our Code and policies?
- c. **Public Test:** Would I be comfortable if customers, friends, or colleagues knew about this decision?
- d. **Organizational Benefit:** Does it serve MasterBrand as a whole, not just a single person or team?

Step  
3

## Stop and Ask: You are responsible, but not alone.

- a. If you answer "Yes" to all these questions, the action is probably okay.
- b. If any answer is "no," "maybe" or even "I don't know" **stop and reach out before you act.** Talk with your supervisor, another leader you trust, Human Resources, or Legal & Compliance before you act.
- c. **Who to contact:**
  - i. Your supervisor or manager
  - ii. Any MasterBrand manager or leader
  - iii. Human Resources
  - iv. Legal or Compliance

Step  
4

## Learn and Adjust: Reflect on your decision.

Ask yourself:

- What worked well?
- What could have been improved?
- What lessons can you share with others?
- Good decisions turn into great ones when we learn and help each other improve.

# Our Speak-Up, Listen-Up Culture

Speaking up is a core part of **Always Accountable** and how we act with integrity every day. We rely on one another to maintain a culture of honesty, fairness, and transparency. When something doesn't feel right, speaking up is one of the most important ways we protect each other and MasterBrand.

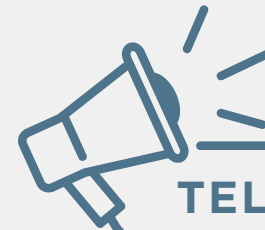
You do not need to be certain that something is wrong to speak up. If something feels off, raising the concern allows the company to review it and take action if needed.

## When To Raise a Concern

- You become aware of conduct that may conflict with law, policy, or our Code.
- You suspect misuse of funds, assets, or data.
- You believe someone has been or may be treated unfairly, harassed, or threatened.



## How To Raise a Concern



### TELL SOMEONE:

- Your supervisor or manager
- Any MasterBrand manager or leader
- Human Resources
- The Legal & Compliance Department



### CALL THE COMPLIANCE HOTLINE

Our Compliance Hotline is confidential, available 24/7, and is run by an independent third party. Reports can be made anonymously if desired.

#### Contact Info:

- United States: 833-416-5415
- Canada: 833-416-5416
- Mexico: 800-681-6922
- <http://masterbrand.ethicspoint.com>

## Our Non-Retaliation Promise

- No one may retaliate against you for raising a concern in good faith.
  - Retaliation includes dismissal, demotion, intimidation, or exclusion.
  - If you believe you are being retaliated against, raise a concern immediately through any speak-up channel.
- 

## What Happens After You Speak Up

- Your report will be taken seriously and investigated promptly and fairly.
- After investigating, we will take necessary action, including terminating employment.
- We will treat your identity and information with care and respect confidentiality to the extent possible.
- You may be asked to cooperate fully with the investigation; doing so helps protect everyone.

By speaking up, you help safeguard trust, fairness, and dignity for all associates and stakeholders. Your voice matters, and your courage reinforces the ethical foundation of our organization.

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## Listening Up

Listening is equally important. When someone raises a concern, leaders and anyone who receives the information must respond with respect, take the concern seriously, and ensure it is reviewed by the appropriate people.

## Additional Resources

For more information see our [Whistleblower Policy](#) which can be found on our Company Policies page on SharePoint.



# Our People and Culture: Respect, Safety, and Belonging

## We Ensure Respect and Dignity

We treat all people with respect and dignity and will not tolerate discrimination or harassment in our workplace. This includes bullying, sexual harassment, threats, name-calling, negative stereotyping, unwelcome physical conduct, offensive gestures, or other behaviors that might create a negative work environment.

We look out for one another, and we speak up when something does not feel right.

### Integrity In Action - What This Means for You

- **Treat others with respect.** Act with professionalism, respect, and courtesy, no matter what.
- **Communicate constructively.** Listen to others, communicate openly, and handle disagreements appropriately.
- **No hostile behavior.** Never use threats, insults, slurs, or behavior that creates a hostile or uncomfortable environment.

**Always Speak Up:** If you experience or witness disrespectful behavior, harassment or threats, report it right away to your supervisor, HR, Legal & Compliance, or the Hotline. Supporting others who speak up strengthens our culture. We take reports seriously and treat people with respect throughout the process. Retaliation against anyone who reports a concern in good faith is not acceptable.

## We Protect Our People

Everyone has a right to work in a safe environment. We strive to adhere to the highest levels of health and safety standards and make every effort to maintain safe and healthy working conditions.

Our **Always Aware** culture is rooted in the belief that every associate should be aware of hazards in the workplace, be aware of their surroundings, and empowered to address those hazards daily. It means following safety rules, using required Personal Protective Equipment (PPE) and reporting hazards immediately to help prevent injuries. Stopping work and speaking up when something does not feel safe is a critical part of how we protect one another.

### Integrity In Action - What This Means for You

- **Share the safety responsibility.** Take reasonable care of your own safety at work and consider the safety of those around you.
- **Respect the rules.** Wear required PPE and follow all safety procedures every time.
- **Stop work.** Stop work when something does not feel safe and ask for help.
- **Help improve safety.** Share ideas that could reduce risk or prevent injuries.

### Additional Resources:

For more information see our [Safety and Environmental Stewardship Policy](#) which can be found on SharePoint.

**Always Speak Up:** If you see unsafe behavior, missing PPE, or equipment concerns, speak up immediately by talking with a supervisor or contacting the Safety team. Protecting one another is part of who we are. Everyone should feel safe raising safety concerns without fear of punishment or pushback.

## We Behave Safely

A safe, respectful workplace depends on the choices each associate makes each day. Everyone has a right to work in an environment free from violence, threats, intimidation, and impaired behavior. We are all responsible for acting in ways that protect the well being of our colleagues and support a secure, productive workplace.

Behaving safely means being aware of our actions, recognizing when something does not feel right, and speaking up before harm occurs. It includes managing our conduct, avoiding behaviors that create risk, and ensuring we are sober and fit for duty so we can make sound decisions and help keep one another safe.

### Integrity In Action - What This Means for You

- **Keep the workplace safe.** Never engage in or tolerate violent, threatening, or intimidating behavior and report concerns right away.
- **Work fit for duty.** Do not work while impaired by drugs or alcohol.
- **Follow the rules.** Comply with all health, safety, and workplace behavior policies.
- **Seek help early.** Reach out to Human Resources if you need support for substance-related concerns.

**Always Speak Up:** If you experience or witness violence, threats, or behavior that feels unsafe, report it right away to your supervisor, HR, Legal & Compliance, or the Hotline. If there is an immediate safety concern, contact local emergency services first. Speaking up helps protect everyone and retaliation is not tolerated.

## We Believe in a Team-Based Culture

We are committed to a workplace where everyone is treated fairly. A team-based culture that celebrates our team's wide range of experiences and backgrounds. When we value diverse perspectives, backgrounds, and experiences, we solve problems better and we are more innovative. Our team-based culture is further strengthened through our associate listening strategy, providing routine dialogue between associates and leaders.

### Integrity In Action - What This Means for You

- **Treat everyone fairly.** Help ensure everyone has the same opportunity to succeed.
- **Make merit-based decisions.** Base all employment-related decisions on merit.
- **Value different perspectives** Listen to different experiences and viewpoints and include others in conversations and decisions.
- **Avoid unfair assumptions.** Do not make choices based on assumptions or personal likes and dislikes that could be unfair to someone else.

**Always Speak Up:** Speak up if you see or experience bias or unfair treatment. If you have concerns about discrimination, harassment, favoritism, or barriers to opportunity, report it right away to your supervisor, HR, Legal & Compliance, or the Hotline. If you are unsure whether something crosses the line, raise the concern so we can help. Retaliation for speaking up or supporting others is not acceptable.

# Our Assets and Information: Protecting What Powers Our Work

## We Protect Equipment, Tools, and Materials

The tools and materials we work with every day are essential to our craft. Whether on a production floor, in the field, in a showroom, or at a customer site, our assets represent years of investment, planning, and innovation. Caring for them protects our ability to deliver quality, reduce unnecessary cost, and maintain safe and efficient operations. Even a single damaged tool or missing hardware can disrupt schedules and impact customers.

## Integrity In Action - What This Means for You

- **Use company resources appropriately.** Only use tools, equipment, and materials for business needs, not for personal projects.
- **Follow operating instructions.** Follow safety and operating instructions to prevent unnecessary damage and repairs.
- **Protect materials and report issues.** Always secure materials properly and report scrap, shrink, missing items, or unusual activity as soon as it is noticed.
- **Get permission.** Confirm approvals before removing equipment or supplies from a worksite or facility.
- **Help prevent waste.** Working to reduce our environmental footprint by reducing waste supports safety, efficiency, and the long-term health of the business.



## We Safeguard Confidential Information and Trade Secrets

We all share responsibility for protecting MasterBrand's assets. This goes beyond protecting physical property and includes safeguarding confidential information and trade secrets. Our designs, pricing, sourcing decisions, launch plans, and customer programs set us apart and have real value. Safeguarding this type of information protects our business and our reputation. Once confidential information is shared improperly, it cannot be taken back, and even unintentional disclosure can cause harm.

## Integrity In Action - What This Means for You

- **Access information appropriately.** Only access confidential information when you need it to do your job.
- **Handle information carefully.** Treat unpublished pricing information, customer lists, business strategies, product drawings, design mockups, customer agreements, and strategic plans carefully and responsibly.
- **Share selectively.** Only share sensitive information with individuals who are permitted to see it and need it to do their jobs.
- **Be careful with third parties.** Never share confidential or sensitive information about MasterBrand, our suppliers, or our customers with anyone outside MasterBrand without authorization to do so.
- **Stay mindful.** Avoid discussing confidential or sensitive information in public places or on personal devices.
- **Store carefully.** Store documents and digital files using secure company systems.

**Always Speak Up:** Don't guess! If you have any questions about what constitutes confidential, sensitive, or proprietary information, ask your supervisor. Speak up immediately if you believe confidential information has been misplaced, accessed improperly, or shared with an unauthorized person. Prompt reporting helps us respond and reduce the negative impact of information being shared improperly, and we do not tolerate retaliation against anyone who speaks up.

## We Communicate Clearly

Clear and accurate communication helps preserve MasterBrand's reputation and ensures we comply with legal and regulatory requirements. Only authorized spokespersons may speak publicly on behalf of the company. Associates may not respond to inquiries from the media, analysts, or other external parties and must direct all requests to Corporate Communications. This includes requests received through email, phone, or social media.

## Integrity In Action - What This Means for You

- **Authorized spokespersons only.** Do not communicate with the media, analysts, investors, government entities, or external organizations on behalf of the company unless you are authorized to do so.
- **Refer inquiries.** Direct all external inquiries to Corporate Communications or another authorized spokesperson.
- **Protect confidential information.** Do not disclose confidential or proprietary information externally unless specifically authorized.
- **Use caution online.** Be mindful when posting online in personal capacities to ensure company information is not unintentionally shared.

### Additional Resources:

For more information see our [External Communications Policy](#) which can be found on SharePoint.



## We Respect Privacy and Secure Personal Information

At MasterBrand, we respect people's privacy and protect their personal information. As part of our business, we have access to personal information belonging to our customers, associates, vendors, suppliers, and partners. We are responsible for protecting that information and handling it properly. That means working to prevent data breaches and following all privacy laws and regulations. Improper access or sharing of personal information can cause real harm and may violate the law.

## Integrity In Action - What This Means for You

- **Be cautious with personal information.** Only access someone else's personal information when you need it to do your job.
- **Do not share information.** Never share personal information learned at work unless you have explicit permission to do so.
- **Limit discussions.** Do not discuss personal information in public places or with people who do not need to know it to do their jobs.
- **Always protect information.** Safeguard all personal information in your possession. Never leave files or devices containing personal information unattended or in a place where they can be seen by others who don't have permission to review them.



**Always Speak Up:** Report any loss, theft, or unauthorized access of personal information immediately to your supervisor or contact MasterBrand's cyber security team at [cybersecurity@masterbrand.com](mailto:cybersecurity@masterbrand.com). Prompt reporting helps reduce harm, and you will not face retaliation for raising concerns in good faith.

**Additional Resources:**  
For more information see our **Enterprise Privacy Policy**, which can be found on SharePoint.

## We Use Technology Responsibly

Our technology and digital tools support nearly every part of our work. This includes the internal systems that keep our operations running, and the customer-facing tools we use to deliver high-quality service, design solutions, and support. As MasterBrand continues to develop advanced digital tools across the business, it is important that we handle all technologies responsibly. Using our tools the right way protects our people, our clients, our information, and our reputation, and it reflects the respect we show for each other and for the company.



## Integrity In Action - What This Means for You

- **Use technology for business only.** Use company technology and digital tools, including AI, only for legitimate business purposes.
- **Follow security requirements.** Stick to all security protocols, including password protection, multi-factor authentication, and approved software updates.
- **Handle information accurately.** Enter, store, and share information accurately when using customer-facing or design tools.
- **Do not misuse systems.** Never use company systems or devices to access, store, or share inappropriate, illegal, or unauthorized content.
- **Use authorized AI tools responsibly.** Use only AI tools approved by the Digital & Technology team, ensuring that all outputs are accurate, ethical, and compliant with company policies. Never enter confidential, sensitive, or personal information into AI systems unless explicitly authorized.

**Always Speak Up:** If you are unsure whether a technology or AI tool is approved for use, or if you have concerns about data security or misuse, ask your supervisor or contact MasterBrand's cyber security team at [cybersecurity@masterbrand.com](mailto:cybersecurity@masterbrand.com). We encourage speaking up early, and retaliation for raising concerns is not acceptable.

### Additional Resources:

For more information see our [Acceptable Use Policy](#), which can be found on SharePoint.

# Our Company: Doing Business with Integrity

## We Avoid Conflicts of Interest

At MasterBrand, Integrity in Action means our decisions are made in the Company's best interest – every day, everywhere. We avoid conflicts of interest and ask all associates to disclose any situation that could create even the appearance of a conflict. The decisions we make every day should be based on what is best for MasterBrand. A conflict of interest exists when personal, family, or financial interests could influence, or appear to influence, what is best for MasterBrand.

### Integrity In Action - What This Means for You

- **Put MasterBrand first.** Make business decisions based on what is best for MasterBrand, not on personal relationships or financial interests.
- **Disclose potential conflicts.** Speak up if a personal, family, or financial relationship could affect your independent judgment at work.
- **Report relationships.** Disclose relationships with suppliers, dealers, contractors, or customers before participating in decisions involving those parties.
- **Outside activities can create conflicts.** Avoid outside employment or business activities that compete with MasterBrand or interfere with your work.
- **Ask for guidance.** Seek guidance if you are unsure whether a situation creates a conflict and disclose all potential or actual conflicts.

**Always Speak Up:** If a situation feels uncomfortable or uncertain, do not ignore it. When in doubt, pause and ask your supervisor, HR, or Legal & Compliance BEFORE you act. Early disclosure helps prevent misunderstandings and protects you and the business. Raising concerns early helps everyone, and you will be supported when you speak up.

### Additional Resources:

For more information see our [Conflicts of Interest policy](#) which can be found on our Company Policies page on SharePoint.

## Avoiding Unclear Decision Making: Spotting Conflicts of Interest

*Recognizing situations that can cloud judgment and influence decisions*



### 1. Personal Relationships

- Hiring or supervising a family member, close friend, or romantic partner
- Selecting a vendor you have a close personal connection with



### 2. Financial Interests

- Having personal investments that could affect your business decisions
- Holding a financial interest in a customer, supplier, or competitor



### 3. Gifts & Hospitality

- Accepting gifts, entertainment, or favors that could influence, or appear to influence, your judgment
- Receiving benefits that create pressure, expectation, or a sense of obligation



### 4. Outside Activities & Personal Businesses

- Running a personal business that overlaps with MasterBrand work
- Doing outside work for customers, vendors, or competitors



### 5. External Roles & Commitments

- Serving on boards or advisory groups that could affect workplace decisions
- Taking on roles that could create competing priorities

*If something feels unclear, bring it up – most conflicts clear up quickly once they're out in the open.*

## We Handle Business Gifts and Entertainment Appropriately

We know that gifts and hospitality can be part of doing business, but they should never create a conflict of interest, act as a bribe, or break the rules. We always use good judgment and follow our Code and the law. Integrity in action means making sure business courtesies never compromise our objectivity or create obligations.

### Integrity In Action - What This Means for You

- **Use caution with gifts.** Never use gifts, entertainment, or other business hospitality to influence a business decision.
- **Preserve objectivity.** Never offer or accept anything that could be seen to compromise someone's judgment or integrity.
- **Consider timing.** Do not accept meals or entertainment during active negotiations or supplier evaluations.
- **Follow the rules and keep records.** Follow our policies, stick to spending limits, and keep clear records of anything you give or receive.
- **Escalate problems.** Decline and report any offer that feels excessive or poorly timed and ask for guidance when something seems questionable.

**Always Speak Up:** Speak up immediately if you believe gifts or entertainment are being used inappropriately. If you are unsure whether a gift or invitation is appropriate, do not guess, ask your supervisor, HR, or Legal & Compliance BEFORE you act. Early disclosure helps prevent misunderstandings and protects you and the business. Raising concerns early helps everyone, and you will be supported when you speak up.

## Right Fit, Right Finish: How We Give



### ACCEPTABLE

- A modest meal or coffee with a client or vendor to discuss business
- Small promotional items with a company logo, such as a pen, mug, or notebook
- Tickets to a local sporting or cultural event when you attend together for a business purpose
- Low value gifts given on a holiday or special occasion
- Light refreshments provided during a business meeting
- Business related training events with modest meals included



### UNACCEPTABLE

- Cash or cash equivalents including gift cards or prepaid debit cards
- Lavish or frequent meals, entertainment, or travel paid for by a client, vendor, or third party
- Tickets to events when the giver does not attend, especially if they are expensive or frequent
- Gifts, hospitality, or favors intended to influence a decision or gain an advantage
- Gifts or entertainment that could be viewed as a bribe or would embarrass the Company if made public
- Personal services, discounts, or favors not available to the public

## We Prohibit Bribery and Corruption

Being **Always Accountable** means we earn business through the quality of our products, the strength of our relationships, and the trust others place in MasterBrand – never through improper payments or personal favors to gain an advantage. We reject corrupt practices in any form, including bribery, kickbacks, extortion, fraud, and other unlawful payments and follow all laws designed to prevent corruption.

Corrupt practices aren't just wrong, they're bad business. They harm our reputation, put people at legal risk, and damage the confidence our customers and partners have in us. They're the opposite of Integrity in Action.

### Integrity In Action - What This Means for You

- **No bribes – ever.** Bribes can be anything of value not just cash. This includes expensive meals, gift cards, travel opportunities, and more.
- **No improper payments.** Never offer, accept, or give money or anything else of value to secure a business advantage, or influence a business decision.
- **Ensure accurate records.** Make sure you record all business transactions accurately and honestly.
- **Never use third parties as a workaround.** Never ask (or allow) agents, distributors, consultants, contractors, or other third parties to do something on MasterBrand's behalf that MasterBrand isn't allowed to do itself.
- **Use extra care with government officials.** When interacting with government officials, we must take extra care. Even small gifts, meals, travel, or favors can be illegal or create the appearance of improper influence when dealing with public employees or agents.

**Always Speak Up:** When in doubt, stop. If you are concerned about a decision or are suspicious about something, speak up immediately. If you are asked to provide a personal favor, gift or payment connected to a business decision, say no and report it immediately. Contact your supervisor, HR, Legal & Compliance, or the Hotline if something does not feel right. Reporting concerns about bribery protects our reputation and supports ethical decision-making, and we will not tolerate retaliation against anyone who raises these concerns.

**Bribes aren't always obvious - they can be disguised as gifts, favors, or business courtesies.**

*To spot potential red flags, ask yourself the following questions before giving or accepting anything of value:*

**?** Could this be seen as an attempt to influence a business or government decision?

**?** Is the value of the benefit unusually high, or outside what's allowed by our policies or local norms?

**?** Is this being offered during a deal, negotiation, bidding process, approval process, or other sensitive moment?

**?** Would this make me uncomfortable if it were made public or shared with my manager?

**?** Is the person receiving the benefit a government official or connected to one - either directly or indirectly?

**?** Is anything about the request, documentation, or payment method vague, secretive, or unusual?

**?** Would I feel comfortable including this on my expense report?

**?** Can I record this accurately with receipts and a clear business purpose?

#### Additional Resources:

For more information see our [Anti-Bribery and Anti-Corruption Policy](#) which can be found on our Company Policies page on SharePoint.

## We Win the Right Way

We compete in the marketplace by delivering exceptional products, reliable service, and an experience our customers can trust. We do not try to win business by taking shortcuts or by undermining competitors. Competing fairly protects our reputation, strengthens our relationships, and keeps our success grounded in performance, quality, and innovation.

Being **Always Accountable** means we follow all antitrust, fair competition, and trade practice laws and regulations. We never try to limit competition through illegal or unethical means.

### Integrity In Action - What This Means for You

- **Avoid inappropriate conversations.** Do not discuss pricing, bids, margins, discounts, production schedules or launch plans with competitors.
- **Never limit competition.** Do not make agreements with competitors to limit competition, this includes anything related to pricing, market share, and business strategy. Never agree to divide customers, territories, or sales opportunities.
- **Make a “noisy” exit.** Immediately leave any meeting or conversation where competitors are sharing sensitive business information and report the situation.
- **Seek guidance before engaging.** Ask for guidance when participating in trade associations, conferences, or industry working groups to ensure compliance.

**Always Speak Up:** Speak up if you suspect a fair competition issue or are unsure of how to handle a relationship or interaction with a competitor. If anyone outside of MasterBrand asks for information about pricing, bids, business strategy or customer plans, stop the conversation and report it right away. Contact your supervisor, HR, Legal & Compliance, or the Hotline if you are ever unsure about what you can or cannot discuss.

## Competitively Sensitive Information

*Never share nonpublic information that could affect competition. Examples include:*



**Pricing:**  
Future pricing, discounts, bids, margins



**Sales & Market Plans:**  
Forecasts, launch calendars, marketing strategies



**Product Info:**  
Designs, prototypes, technical specs, R&D plans



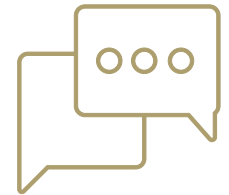
**Operations & Supply Chain:**  
Supplier pricing, sourcing details, production capacity



**Customer Data:** Customer lists, contract terms, purchasing volumes

**When in doubt, don't share. Ask Legal & Compliance.**

**Friendly Chat... or a Red Flag?**



Competitors may show up at trade shows, association meetings, supplier visits, or even in a shared customer's lobby. A simple conversation can turn risky fast.

If the discussion shifts toward pricing, bids, customers, production plans, or strategy – stop immediately. Leave the conversation and report the issue to Legal & Compliance as soon as possible.

*Bonus tip: It doesn't hurt to be a little dramatic. Making a “noisy” or memorable exit from a problematic conversation means that everyone is likely to remember that you didn't participate in the troubling behavior. That's good for you and MasterBrand.*

## We Comply with Global Trade Regulations

MasterBrand products are shipped, sold and supported across many regions. Moving goods across borders comes with strict rules, and we follow them without exception. Compliance with international trade regulations protects our ability to serve customers, prevents costly delays, and maintains the trust of regulators and partners.

Laws governing imports, exports, customs, and economic sanctions are complex. Even small errors can cause delays, penalties, and supply chain disruptions. Careful attention to detail maintains our commitments to customers and protects the business.

### Integrity In Action - What This Means for You

- **Know the requirements.** If it is relevant to your job, make sure you understand and comply with the current rules and regulations affecting the inbound or outbound sale or shipment of goods in the countries where we conduct business.
- **Be accurate and truthful:** Make sure any information you provide to customs, tax, or other government officials is accurate, complete, and truthful.
- **Do not take shortcuts.** Never bypass trade controls, country restrictions, or sanctions under pressure to meet a deadline.
- **Confirm before expanding.** Contact our Legal Department before selling or shipping products to or doing business in any country where MasterBrand does not currently do business.

**Always Speak Up:** If you become aware of incorrect trade documentation, missing licenses, or pressure to bypass trade controls, report it immediately. Contact your supervisor, Legal & Compliance, the Trade Compliance Team, or the Hotline right away. For more information, see our [Global Trade Compliance Policy](#), which can be found on SharePoint.

## We Never Participate in Insider Trading

Protecting confidential company information is an important responsibility. We prevent insider trading by never sharing or using confidential MasterBrand information for the purposes of purchasing, selling, or otherwise engaging in securities transactions.

### Integrity In Action - What This Means for You

- **No insider trading.** Never buy or sell MasterBrand securities when you have material non-public information.
- **Keep information private.** Do not share confidential business information with family, friends, or anyone else who might use it to trade stocks.
- **Protect information until it is public.** Keep information about financial performance, new products, pricing changes, mergers, acquisitions or leadership decisions confidential until it has been released publicly.
- **Use caution.** Ask for guidance if you are unsure whether information is considered material or public.

**Always Speak Up:** If you believe someone is using confidential company information to trade securities or to help someone else trade, report it immediately. Contact your supervisor, HR, Legal & Compliance, or the Hotline without delay. For more information, see our [Insider Trading Policy](#), which can be found on SharePoint.



## We Maintain Accurate Records

At MasterBrand, we are committed to keeping accurate records of our business activities. Accurate records are everyone's responsibility. Even small mistakes, intentional shortcuts, or delayed reporting can affect production planning, customer deliveries and financial results, and the information we share externally. Being truthful in documentation and reporting reflects our commitment to doing the right thing and strengthens the reliability of the information others depend on.

### Integrity In Action - What This Means for You

- **Accuracy matters.** Be truthful and complete when documenting financial, operational, or business information.
- **No false records.** Never misstate or hide facts. Be open and truthful in all records, reports, contracts, emails, or internal systems.
- **Use approved processes.** Follow our policies and internal controls for recordkeeping, approvals, and reporting.

**Always Speak Up:** If you see inaccurate entries, incomplete documentation or face pressure to alter records, report it immediately. Contact your supervisor, HR, Legal & Compliance, or the Hotline to protect product integrity and the reliability of our systems.



# Our Customers and Partners: Quality in Every Relationship

## We Create Safe, High-Quality Products

**Always Care** reflects our shared responsibility for quality. Every associate is empowered to stop a quality defect from happening or moving forward, whether on the production floor or in the office. Our reputation is built on the quality and safety of the products we create. Every step in our process contributes to the performance, durability, and reliability customers expect from MasterBrand. Meeting the highest standards protects our users, strengthens our partnerships, and reflects pride in our craft.

## Integrity In Action - What This Means for You

- **Meet standards every time.** Follow all quality and safety procedures and meet approved standards every time.
- **Keep improving.** Support corrective actions and continuous improvement efforts at every stage of production.
- **No cover-ups.** Never ignore or conceal issues that could affect product integrity, customer safety, or brand trust.
- **Pause when standards are not met.** Stop work and ask for guidance if you believe a product, component, or installation does not meet required standards.

**Always Speak Up:** Never turn a blind eye to concerns about product quality or safety. If you notice a quality or safety issue, report it immediately. Contact your supervisor or the Quality Team so the issue can be addressed as quickly as possible.

## We Are Honest and Accurate When Communicating About MasterBrand

We are committed to providing accurate and timely information to MasterBrand's investors, customers, partners, and other stakeholders, including in our public disclosures. We always describe our products honestly and completely. Accurate descriptions of materials, finishes, performance, and pricing build trust and foster lasting partnerships. We do not exaggerate the benefits of our products or make claims we cannot support.

Misleading statements, incomplete information or unapproved product claims hurt customers and expose the company to legal and reputational risk. Integrity in our communications, marketing, and sales practices protects MasterBrand and reflects our commitment to transparency.

## Integrity In Action - What This Means for You

- **Know your role.** Only speak with investors if you have the authority to do so. If someone asks you a question you aren't authorized to answer, contact Investor Relations team immediately.
- **Follow communication protocols.** Check with the Investor Relations and Corporate Communications teams before you speak with the press about MasterBrand business.
- **Use authorized content only.** Use only approved materials, specifications, images and claims in marketing and sales discussions.
- **Be truthful.** Accurately describe products, features, materials, and installation requirements.
- **Ask first.** Ask for guidance before using new statements, comparisons or claims that are not part of approved materials.

**Always Speak Up:** If you become aware of an inaccurate product claim or misleading information in marketing or sales materials, report it immediately to your supervisor or the Sales or Marketing team.

As a publicly traded company, MasterBrand has additional responsibilities when sharing information externally. We are committed to providing full, fair, accurate, timely, and understandable disclosures in our public communications, including SEC filings and other investor-related disclosures.

Only authorized spokespeople may communicate with investors, analysts, or the media on behalf of MasterBrand. Do not share material nonpublic information in conversations, meetings, plant tours, presentations, or on social media.

If you believe inaccurate, incomplete, or premature information may have been shared externally, report it immediately so it can be addressed promptly.



## We Choose Ethical Suppliers and Partners

We expect our suppliers and service partners to share our commitment to safety, quality and ethical conduct. Choosing the right partners protects the business and strengthens the value we deliver. Third parties acting on MasterBrand's behalf must follow our standards, and associates may not use agents, consultants or other intermediaries to bypass Company restrictions or engage in conduct that would be prohibited if done directly.

### Integrity In Action - What This Means for You

- **Meet standards every time.** Follow all quality and safety procedures and meet approved standards every time.
- **Partner responsibly.** Work only with suppliers and service partners that meet MasterBrand standards for labor, safety, and quality.
- **Respect governance.** Follow approved processes when selecting or evaluating suppliers.
- **Act decisively.** Escalate concerns immediately if a supplier fails to correct a serious issue.

**Always Speak Up:** If you become aware of unsafe working conditions, unethical conduct or product integrity issues in the supply chain, report them immediately to your supervisor, Sourcing, Legal & Compliance, or the Hotline.

#### Additional Resources:

For more information see our Supplier Code of Conduct which can be found on our Company Policies page on SharePoint.

# Our Communities and Planet: Operating Responsibly

## We Source Materials Responsibly and Transparently

The materials we use shape the quality of our products and the impact we have on the world. We are committed to sourcing wood and other materials in ways that support responsible forestry, lawful trade, and ethical supply chains. Clear and honest reporting about material origins and environmental attributes builds trust with customers, partners and regulators.

### Integrity In Action - What This Means for You

- **Source responsibly.** Follow all policies and standards for lawful and ethical sourcing.
- **Verify records.** Check that required documentation for wood and other raw materials is complete and accurate before purchase or use.
- **Flag irregularities.** Report concerns about suspicious sourcing, missing documentation, or environmental claims that cannot be verified.

**Always Speak Up:** If something seems unclear or incomplete in sourcing documentation or environmental reporting, ask for guidance immediately. Report them immediately to your supervisor, Sourcing, Legal & Compliance, or the Hotline.



## We Support Human Rights

We believe that all human beings should be treated with dignity and respect and are committed to upholding internationally recognized human rights of all people. We use all reasonable efforts to avoid causing or contributing to human rights abuses.

Our responsibility does not end at our own facilities. We expect every supplier and factory we partner with to uphold safe working conditions and protect the dignity and rights of their workforce. There is no place in our operations or our supply chain for forced labor, child labor, human trafficking, or any practice that exploits people or puts them at risk.

### Integrity In Action - What This Means for You

- **Choose ethical suppliers.** Work only with suppliers that meet MasterBrand standards for human rights, labor, and safety.
- **Confirm eligibility.** Verify age documentation and escalate concerns if inconsistencies appear.
- **Follow our rules.** Follow approved processes for supplier selection, monitoring, and corrective action.
- **Ask for help.** Stop work and escalate concerns when a supplier fails to correct serious issues.

**Always Speak Up:** If you learn of unsafe working conditions or potential labor violations in our supply chain, report them immediately to your supervisor, Sourcing, Legal & Compliance, or the Hotline.

#### Additional Resources:

For more information see our Human Rights Policy which can be found on our Company Policies page on SharePoint.

## Modern slavery occurs in almost every country in the world. It impacts people of all races, cultures, ethnicities, and religions.

*The following red flags could mean that someone is trapped in a forced labor situation. If you spot any signs of modern slavery when interacting with our suppliers or other third parties, let the Legal & Compliance department know immediately. You could be saving someone's life.*



Restriction of movement



Isolation of employees



Physical and sexual violence



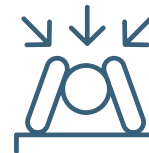
Intimidation and threats



Retention of identity documents



Withholding of wages



Abusive working and living conditions



Excessive overtime

## We Work to Reduce Waste, Emissions, and Chemical Hazards

Protecting our planet is part of protecting our business and our communities. We aim to reduce waste and emissions and to handle chemicals and materials safely. Responsible manufacturing supports cleaner operations today and protects future generations.

### Integrity In Action - What This Means for You

- **Stay informed.** Understand and comply with all environmental laws, policies, procedures, and guidelines that apply to your job responsibilities.
- **Follow our rules.** Follow all procedures for waste reduction, recycling, and responsible disposal.
- **Work safely.** Handle chemicals and hazardous materials safely and only with proper training.
- **Don't take shortcuts.** Never bypass air or water emission controls or equipment designed to protect people and the environment.
- **Drive sustainability.** Look for ways to reduce waste, recycle, and otherwise reduce our environmental footprint.

**Always Speak Up:** Report spills, leaks, or unsafe handling immediately. If you see unsafe disposal, chemical misuse or attempts to bypass environmental controls, report it immediately to your supervisor, EHS, Legal & Compliance, or the Hotline.

## We Are a Positive Force in Our Communities

We are part of the communities where we operate. Supporting local needs, encouraging volunteerism and being a responsible neighbor builds pride in our company and strengthens our relationships. The impact we make goes beyond the products we build.

Giving back can happen in many ways: volunteering time, supporting local programs, or participating in events that uplift the communities where we live and work. Positive community engagement reinforces who we are and the values we stand for. Acting as good citizens strengthens trust and connection with the communities that support our business.

### Integrity In Action - What This Means for You

- **Remember people are watching.** Represent MasterBrand positively in the community and at local events.
- **Operate appropriately.** Follow company guidelines when volunteering or participating in activities on behalf of MasterBrand.
- **Foster goodwill.** Support efforts that strengthen local relationships and create opportunities for others.

**Always Speak Up:** If you have concerns about community activities being represented inaccurately or misaligned with company values, report them to your supervisor or Communications. For more information, see our [Charitable Giving Policy](#), which can be found on SharePoint.

## We Separate Personal and Professional Political Activities

Everyone is free to participate in civic and political activities in a personal capacity, but we are cautious about keeping our personal activities separate from our work. MasterBrand follows strict rules that govern political contributions, lobbying, and public advocacy. These rules protect our company and ensure we remain compliant with all legal requirements. Political views should never influence business decisions, hiring, or advancement.

### Integrity In Action - What This Means for You

- **Keep politics separate.** Never use company time, property, or resources to support personal political causes unless you've been authorized to do so and are complying with company policy.
- **Avoid commitments.** Never make or promise any political contribution on behalf of the company unless you've been authorized to do so and are complying with company policy.
- **Keep MasterBrand out of the conversation.** Never suggest that MasterBrand supports your personal political views or activities.
- **Ask for help.** Ask for guidance if you are unsure whether an activity may create a conflict between personal and company representation.

**Always Speak Up:** If you believe company resources are being used for political purposes or that MasterBrand is being represented in political activities without authorization, immediately to your supervisor, Legal & Compliance, or the Hotline..



## A Final Word

By treating one another with respect, staying informed, making good choices, and speaking up, we put Always Accountable into action. By being Always Accountable, we strengthen our culture, protect our reputation, and build great experiences together, every day.

### Integrity in Action Checklist



**Know and follow the rules that apply to your job**



**Do business with integrity and remember our Always Accountable culture when making decisions.**



**If you don't know what to do or how to do it, just ask.**



**Always speak up if you hear or see something that makes you feel concerned.**