

BLUELINX HOLDINGS INC.
SUPPLIER CODE OF CONDUCT

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BlueLinx's Supplier Code of Conduct ("Code") applies to all suppliers that provide goods and services, directly or indirectly, to BlueLinx Corporation or its affiliates (collectively, "BlueLinx"), including vendors, agents, contractors, subcontractors, sub-suppliers, consultants and other third-party providers acting on BlueLinx's behalf (collectively, "Suppliers").

This Code defines the minimum requirements for supplier conduct that BlueLinx expects in terms of business ethics and social and environmental responsibility. Suppliers are encouraged to exceed these requirements and align with industry best practices, wherever possible. Suppliers must maintain complete and accurate documentation and records to demonstrate compliance with this code and make the same available to BlueLinx upon request.

BUSINESS ETHICS

Compliance with Laws and BlueLinx Policies

Suppliers, their sub-suppliers, and any approved subcontractors, must comply with the laws and regulations of the countries and jurisdictions in which they operate. Suppliers shall also comply with international laws and regulations, including those related to international trade, sanctions, antitrust/fair competition, and anti-bribery and corruption. If BlueLinx's policies exceed the requirements of any applicable law or regulation, BlueLinx's policies will prevail.

Conflicts of Interest

Suppliers cannot obtain, or attempt to obtain, a personal or business advantage through improper or illegal means, or an unfair business advantage for any third parties (including family members and others with a personal relationship).

Bribery and Corruption

Suppliers and any affiliates acting on their behalf, such as agents or other third parties, must comply with the U.S. Foreign Corrupt Practices Act ("FCPA"), which prohibits the use of enticements or incentives, monetary or otherwise, to public officials or individuals in the private sector for the express purpose of securing or favorably influencing the outcome of a business transaction or continuing or furthering a business relationship.

Confidential Information

Suppliers shall protect BlueLinx's confidential information and intellectual property, and the confidential information and intellectual property of BlueLinx's customers.

Subcontracting

BlueLinx does not permit Suppliers to subcontract any contractual obligation or task to another party without prior authorization. If a subcontractor is so authorized by BlueLinx, Suppliers must inform the subcontractor of this Code and hold the subcontractor accountable to all requirements.

LABOR, HEALTH, AND SAFETY

Forced Labor

All forms of forced or involuntary labor are strictly prohibited, including prison, indentured, slave, bonded or human trafficked labor (including debt bondage). Suppliers must monitor any third parties that assist them in recruiting or hiring workers to ensure their compliance.

Child Labor

Child labor is strictly prohibited. Vendors must not employ any worker under the age of 15 or the age of compulsory education in the country of manufacture, whichever is higher. Suppliers must maintain copies of official documentation for every worker to verify their date of birth.

Harassment, Abuse and Violence

Suppliers must treat every worker with respect and dignity. No worker should be subject to any form of physical, sexual, psychological or verbal harassment or abuse. Suppliers must also not use monetary fines as disciplinary measures.

Health and Safety

Suppliers are expected to provide a safe and healthy workplace to prevent accidents and injuries to workers which may occur during work, including providing, when necessary, appropriate personal protective equipment to workers to prevent the risk of accident or injury, and implementing policies, management systems and training to keep workers safe and healthy.

Nondiscrimination

Suppliers are expected to treat their employees fairly in accordance with laws and industry standards in all aspects of the employment relationship, including hiring, compensation, access to benefits, promotions, advancements, disciplinary action, or termination.

Freedom of Association

Suppliers must respect the rights of all workers to lawfully associate, or not to associate, with groups of their choosing, provided such groups are permitted by law. Vendors should not unlawfully interfere with, obstruct or prevent legitimate, lawful employee associations and related activities.

Wages and Benefits

Suppliers must pay wages and overtime in compliance with all applicable laws and regulations in the country of manufacture. Suppliers must pay workers at least the minimum wage and benefits required by local law. Workers must be compensated for overtime hours at the premium rate that may be required.

Hours of Work

Suppliers must ensure that, except in extraordinary business circumstances, on a regularly scheduled basis, workers are not required to work more than: (a) the lesser of sixty (60) hours per week, including overtime, or (b) the limits on regular and overtime hours allowed by the laws of the country of manufacture, while also having at least one (1) day off every seven (7) day period.

ENVIRONMENTAL RESPONSIBILITY

Environment

Suppliers are expected to comply with all applicable environmental laws and regulations in the countries of manufacture and maintain management systems and controls to reduce environmental impacts and support the conservation of natural resources.

Chemicals Management

Suppliers must comply with all applicable regulations related to restricted materials and maintain management systems and controls to ensure restricted materials are not included in the manufacturing, labelling, or packaging of BlueLinx products.

CONFLICT MINERALS

Due Diligence

Whenever tin, tantalum, tungsten or gold are included in products sold to BlueLinx to improve their performance or functionality, suppliers are expected to perform reasonable due diligence measures to ensure the minerals have been responsibly sourced and do not support conflict in the Democratic Republic of Congo or any of its adjoining countries.

TRANSPARENCY, MONITORING, AND COMPLIANCE

Transparency

Suppliers are expected to, upon request, provide a complete and accurate supply chain map for their products. BlueLinx does recognize active chain-of-custody certificates from globally recognized certification programs, such as the Forest Stewardship Council, Programme for the Endorsement of Forest Certification, and the Sustainable Forestry Initiative.

Monitoring

Suppliers must allow BlueLinx and its designated third parties full access to all manufacturing and storage facilities, documentation, and workers, as necessary to validate compliance with this Code.

Reporting Concerns

Suspected violations of this Code may be reported to BlueLinx's Business Conduct and Ethics Hotline at 877-460-BLUE or online by going to www.bluelinxco.ethicspoint.com.