



**160 Exeter Drive
Winchester, VA 22603-8605**

POLICY – VENDOR AND CUSTOMER CODE OF CONDUCT AND ETHICS

EFFECTIVE: October 11, 2018

POLICY PURPOSE

Trex Company, Inc. (“Trex”) is committed to conducting business activities with the highest standards of business ethics and in accordance with all applicable laws and regulations. This Vendor and Customer Code of Conduct and Ethics (“Code”) applies to all parties providing goods and services to Trex, and all of our channel partners who distribute, sell and/or install Trex products (collectively, “Business Partners”). Trex expects all of its Business Partners, and all of their employees, agents and subcontractors (“Representatives”), to follow our high ethical standards set forth in this Code while they are conducting business with us or on our behalf.

COMPLIANCE WITH LAWS AND REGULATIONS

All Business Partners, while conducting business with or on behalf of Trex, shall conduct their business in full compliance with all applicable laws and regulations, and shall require that their Representatives do the same.

All Business Partners shall comply with all anti-bribery and anti-corruption laws worldwide, including but not limited to the United States Foreign Corrupt Practices Act. Business Partners must never accept or provide anything of value, or make any improper payments, either directly or indirectly, to any government official, employee of a government-controlled company, political party, customer or private third party, in order to obtain any improper benefit or advantage.

Business Partners shall conduct business in full compliance with all applicable antitrust and unfair competition laws. Business Partners shall avoid unlawful agreements or understandings that improperly limit the supply or affect the price of goods or services provided to Trex, or products offered by Trex.

Business Partners shall operate in compliance with all applicable environmental laws and regulations, and shall work to minimize their use of natural resources and any negative impact their operations have on the environment.

EMPLOYMENT PRACTICES

Trex expects Business Partners to respect their employees and comply with all applicable laws and regulations relating to employment. Business Partners shall not discriminate in hiring or employment decisions based on race, color, religion, sex, national origin, age, disability, veteran status, pregnancy, sexual orientation, gender identity or expression, or any other reason prohibited by applicable law. Business Partners must be committed to treating employees with respect and dignity and providing a workplace free of sexual harassment or other unlawful harassment. Business Partners must not tolerate harassment of employees by managers or co-workers, and will endeavor to protect employees from harassment by non-employees in the workplace. Business Partners should expect their employees to treat their coworkers and employees of their customers and suppliers with dignity and respect. Business Partners must comply with all applicable compensation laws, including those related to minimum wage, working hours, rest periods and overtime work.

Business Partners must not employ anyone under the minimum age permitted by applicable local law in any position, and employees under the age of 18 should not perform hazardous work. Where young workers are subject to compulsory education laws, they should work only outside of school hours and should not work during night hours. Business Partners may not allow any labor practices utilizing prison, slave, forced, bonded, or indentured labor in their operations and will not engage in any other form of compulsory labor such as human trafficking.

Business Partners should provide a safe and secure business environment for the protection of their employees, and shall comply with all applicable laws pertaining to health and safety in the workplace. Effective steps should be taken to prevent health and safety incidents and occupational injury and/or illness.

Business Partners should respect the rights of their employees to associate with any lawful organization, including labor organizations.

BUSINESS PRACTICES

Business Partners shall conduct their business interactions and activities with integrity. Although many Business Partners may have their own compliance requirements, business practice standards, and/or codes of conduct, it is essential that all Business Partners understand and uphold the requirements of Trex for acceptable business conduct when doing business with or on behalf of Trex.

Business Partners shall honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. We expect our Business Partners to comply with all applicable security and privacy laws and regulations, and to ensure that they have appropriate technical and security controls in place to protect our confidential information.

Business Partners should comply with all intellectual property rights of Trex and others including but not limited to patents, trademarks, trade secrets and copyright, and use software, hardware and content only in accordance with their associated license or terms of use.

Business Partners may not directly or indirectly trade in Trex stock while in possession of material non-public information received from Trex or obtained in connection with the work undertaken for or on behalf of Trex.

If a Business Partner works directly with any Trex employee whose spouse or other family member is an employee or has a personal or financial interest in the Business Partner, such association must first be fully disclosed to and approved by Trex's General Counsel.

Trex seeks to conduct its business in accordance with the highest business standards. In regards to gifts, we expect our Business Partners, in their dealings with Trex employees, to adhere to the Trex gift policy. This policy is in place to reduce Business Partners' cost, lower Trex's cost, and ensure that all decisions with and about Business Partners are above reproach. Trex's gift policy states, "No gift or entertainment should be offered, given, provided or accepted by any employees or their family members if it (1) is a cash gift, (2) is not consistent with customary business practices, (3) is excessive in value under the circumstances, (4) can be construed as a bribe or payoff, or (5) violates any laws or regulations."

TREX COMPANY CODE OF CONDUCT AND ETHICS

Trex expects its Business Partners to understand and comply with the Trex Company Code of Conduct and Ethics, which is available at www.trex.com.

GUIDANCE AND REPORTING FOR EMPLOYEES OF BUSINESS PARTNERS

If a Business Partner or Representative has a question about a particular situation, or needs to report a problem or concern, they are encouraged to work with their primary Trex contact in resolving a business practice or compliance concern. Trex recognizes, however, that there may be times when this is not possible or appropriate. In such instances, a Business Partner or Representative may contact the Trex Corporate Governance Hotline (800-719-4916). An independent third-party vendor maintains this Governance Hotline, and all calls are e-mailed immediately to the General Counsel and Chief Financial Officer.

Trex strictly prohibits acts of retaliation against anyone who has, in good faith, sought out advice or has reported possible violations of this Code. Business Partners will help the process by cooperating fully and honestly in an investigation of potential illegal or unethical behavior and will not face retaliation for doing so.

SUPPLY CHAIN ASSESSMENTS

We conduct supply chain assessments, including in-person reviews and operating facility tours, when considered necessary in relation to the significance of the purchase and business opportunity.

Approved:

Trex Company, Inc.



James E. Cline, President and Chief Executive Officer