

# **NCI BUILDING SYSTEMS, INC.**

## **Confidential Complaint Procedures for Employee Relations Matters**

The Company is committed to fostering a work environment in which all individuals are treated with respect and dignity. Each individual should be permitted to work in a business-like atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, the Company expects that all relationships among persons in the workplace will be business-like and free of unlawful bias, prejudice and harassment. It is the Company's policy to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, or any other status protected by law. The Company's Non-Discrimination Policy and Anti-Harassment Policy is contained in the Employee Manual.

No Company employee may interfere with or retaliate against another employee who seeks to invoke his or her rights under the laws governing labor and employee relations. If any employee has any questions about the laws or Company policies governing labor and employee relations matters, he or she should consult the Employee Manual or contact the Human Resources Department or the Legal Department.

The Company is committed to providing a safe workplace for all employees. In addition, several laws and regulations impose responsibility on the Company to safeguard against safety and health hazards. For that reason, and to protect the safety of themselves and others, employees and other persons who are present at Company facilities are required to follow carefully all safety instructions and procedures that the Company adopts. Questions about possible health and safety hazards at any Company facility should be directed immediately to the employee's supervisor.

In order to facilitate the reporting of employee complaints, the Company has established the following procedures for (i) the receipt, retention and treatment of complaints regarding employment, discrimination and harassment matters ("Employee Relation Matters"), and (ii) the confidential, anonymous submission by employees of concerns regarding questionable Employee Relation Matters.

### **1. Receipt of Employee Complaints.**

a. Employees with concerns regarding Employee Relation Matters may report their concerns to Norman C. Chambers, (Chairman of the Board, President and CEO), Rick Morrow, (Human Resources Department), or Todd Moore, (General Counsel), at 281-897-7788 or 1-888-624-8678.

b. Alternatively, if an employee chooses, the employee may forward complaints on a confidential/anonymous basis through a hotline or via Internet to:

**NCI BUILDING SYSTEMS-CONFIDENTIAL EMPLOYEE HOLINE**  
**c/o EthicsPoint**  
<http://www.ethicspoint.com/>  
**1-866-ETHICSP (1-866-384-4277)**

Any and all complaints received through the NCI Confidential Employee Hotline will be forwarded **in a confidential format** to the Chairman of the Board, Human Resources personnel and General Counsel for review and investigation.

### **2. Scope of Matters Covered by These Procedures.**

These procedures relate to employee complaints relating to any matters, including, without

limitation, the following:

a. Discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, or any other status protected by law.

b. Any form of sexual harassment or violations of the Company's employment policies and procedures.

### 3. Treatment of Complaints.

a. Upon receipt of a complaint, the Company will (i) determine the seriousness and validity of the claim, and (ii) when possible, acknowledge receipt of the complaint to the sender.

b. Complaints relating to Employee Relation Matters will be reviewed under direction and oversight by the Chairman of the Board and Human Resources Department or such other persons as may be appropriate under the circumstances. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

c. Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Company.

d. The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding Employee Relation Matters.

### 4. Reporting and Retention of Complaints and Investigations.

The Company will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof. Copies of complaints and such log will be maintained in accordance with the Company's document retention policy.

<i><b>Via Public Internet</b></i>	<i><b>Toll-Free Phone</b></i>
From any computer having Internet access (home, public library, neighbor, etc.), go to <a href="http://www.ethicspoint.com">www.ethicspoint.com</a> and click on "File a Report".	Call <b>Ethicspoint's</b> toll-free hotline at <b>1-866-ETHICSP (1-866-384-4277)</b> . A compliance specialist will assist you in entering your report into the <b>Ethicspoint</b> system.

**Complete a Report:** Following the on-screen or compliance specialist's instructions please complete a report, being as thorough as you can.

1. Specify what kind of report you'd like to make from the available choices.
2. Please read or listen to the anonymity information very carefully. It helps to ensure that you do not compromise your identity during the reporting process. Click on or say "I agree."
3. You will now complete the report, providing information about the incident, including:

**Who:** persons engaged in the incident, including titles;

**What:** what specifically occurred;

**Where:** the location of the incident; and

**When:** the time and duration of the incident.

4. Next, you will be asked to create a password. Then the Ethicspoint system will generate an identification code called a "Report Key." Write them both down, and keep them in a safe place. You will need them to follow-up later, or if you ever want to review or amend your report.

**Follow-Up 2 Days Later:** Two business days after you complete your report, please return to the Ethicspoint system to see if the company has any follow-up questions or requests.

1. Reconnect with the Ethicspoint system using any of the channels of communication: **Public Internet or Toll-Free Phone.**
2. This time click on (or ask to perform) a Follow-Up.
3. Provide your Report Key and Password.
4. You can now elect to review report details, respond to questions, and add information.
5. To review your report, just click "Review Report Details" or ask the compliance specialist.
6. You will be told if your company has entered questions about your report. Answer the questions verbally or by typing in the question boxes and click "Submit".
7. You can add information to the report verbally or by using the "Submit New Information" box.