

BLUELINX HOLDINGS INC.

CODE OF CONDUCT

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**BLUELINX HOLDINGS INC.
CODE OF CONDUCT**

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OVERVIEW

At BlueLinx Holdings Inc. (together with its subsidiaries, “BlueLinx” or the “Company”), our core values of integrity, teamwork and continuous improvement are the cornerstone of everything we do. Because of these values, it is our policy to conduct business in a manner consistent with the highest ethical standards and in compliance with both the letter and the spirit of the law. Our adherence to our values and this policy is key to maintaining and building upon BlueLinx’s reputation for excellence and integrity.

This Code of Conduct (the “Code”) is a statement of the fundamental principles that govern the conduct of the Company’s business that applies to all representatives of BlueLinx, together with its direct and indirect subsidiaries, including directors, officers and employees (collectively, the “BlueLinx Associates”). In addition, other persons may be subject to the provisions of this Code by contract or agreement when engaged by or otherwise representing BlueLinx and its interests.

The standards in this Code are expressed generally and may not address every specific circumstance. Each of us must take an active role in applying its rules to our daily conduct at BlueLinx. In addition, the Company has other policies on specific topics that are referred to in, or otherwise supplement, this Code that should be consulted for additional information. Any BlueLinx Associate who has questions concerning the Code’s application or disclosure of an incident should contact the Vice President, Human Resources, or the General Counsel & Corporate Secretary. Every BlueLinx Associate should bring to the Company’s attention any action that does not comply with this Code or policy issued by the Company.

Any violation of this Code by a BlueLinx Associate may result in appropriate disciplinary action, up to and including termination of employment. Violations of this Code may also be violations of law and may result in civil or criminal penalties for the BlueLinx Associate, their supervisors and/or the Company. Any violation by non-employees who are subject to this Code will result in appropriate actions that may include termination of the relevant business arrangement and/or criminal prosecution.

This Code is not intended to confer any special rights or privileges upon any individuals, provide greater or lesser rights than those provided under applicable U.S. or non-U.S. laws, rules and regulations, or entitle any person to remain employed by BlueLinx or any of its subsidiaries.

BlueLinx may amend the Code to address changes in the law, meet the needs of our business, or for other reasons. BlueLinx also supplements the Code with policies and procedures, some of which are mentioned in the Code. To the extent the Code contradicts or is inconsistent with applicable law, the applicable law will apply.

GENERAL

Confidential Information

Within the Company, information flows freely. As a result, BlueLinx Associates may have access to, or become aware of, Company confidential and/or proprietary information – that is, information relating to the Company’s business which is not generally or publicly known and is therefore of a sensitive nature. This information includes, but is not limited to:

- information, technical or otherwise, related to the Company’s products, services, specifications and operations;

- information relating to the Company's sales and marketing strategies, sales figures, expansion plans, current and prospective customers, distributors, agents and suppliers and lists;
- information relating to the Company's financial performance and objectives, service and product cost structure, pricing strategies, audit reports, business plans, facilities lease agreements, capital investment plans and any joint venture, merger, and acquisition strategies;
- discoveries, concepts, ideas, inventions, trade secrets, and drawings, descriptions and models illustrating technological know-how;
- personally identifiable information such as social security numbers, driver's license or resident identification numbers, financial account, credit or debit card numbers, security and access codes or passwords that would permit access to medical, financial or other legally protected information; and
- material and information received by the Company from third parties in confidence through non-disclosure and/or confidentiality agreements or through other written or verbal agreements or arrangements in which the obligation of confidentiality is implicit, or through meetings with third parties where the circumstances of the disclosure lend a confidential nature to the material or information.

To help protect the Company's interests, all BlueLinx Associates must follow these guidelines:

- No BlueLinx Associate may use, either for his or her own personal benefit or for the benefit of others, Company information which is not publicly known.
- No BlueLinx Associate may disclose trade secrets, proprietary or confidential information to other BlueLinx Associates or outsiders, except as required in the conduct of Company business.
- BlueLinx Associates should dispose of documents containing confidential or proprietary information with care to avoid inadvertent disclosure.

Just as the Company protects, and requires BlueLinx Associates to respect, its own confidential and proprietary information, BlueLinx Associates have a duty to respect the confidentiality rights of others. In the normal course of doing business, it is common to acquire information about other companies and current or potential customers, suppliers and competitors. BlueLinx Associates must respect the confidential and proprietary nature of this information as if it were the Company's information and not use it for their own purposes or reveal it to others, and otherwise comply with the above guidelines.

Company confidential information does not include information that is lawfully acquired by non-management BlueLinx Associates about wages, hours or other terms and conditions of employment if the information is used for purposes protected by § 7 of the National Labor Relations Act.

Controllership

As a public company, BlueLinx is required to follow strict accounting principles and standards, to timely report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with applicable law. Accordingly, the Company shall maintain internal controls to ensure that transactions are properly authorized, assets are safeguarded, operations are conducted in accordance with the Board of Directors' directives and financial records are reliable.

The Company's books and records must reflect a materially accurate and verifiable record of all transactions and the resulting amounts of Company assets and liabilities. You must follow the Company's general accounting procedures and all generally accepted accounting principles, laws and regulations related to accounting and financial reporting of transactions, estimates and forecasts. In addition, BlueLinx Associates must provide timely, candid forecasts and assessments to management. Similarly, you must maintain sound processes and controls.

Reports or records should not be used to mislead those who receive them, or to conceal anything that is improper. Falsifying or altering records, or knowingly approving false records or reporting false information is prohibited. Further, BlueLinx Associate have very limited discretion regarding the retention or destruction of Company records and must maintain records in accordance with the Company's Records Retention Policy. The Company is required by law to retain certain records for various periods of time. Electronic records are to be treated the same as any other business records.

You must safeguard all physical, financial, informational and other Company assets. Preventing loss, misuse, damage or theft of the Company's assets is part of your job. All assets should be used only for the benefit of the Company. Except as specifically authorized, you may not use or take Company property or services for your or someone else's personal benefit.

Public Disclosures

BlueLinx has a responsibility under the law to communicate effectively so that the public is provided with full and accurate information in all material respects. To the extent you are involved in the preparation of materials for dissemination to the public, you should be careful to ensure that the information in these materials is truthful, accurate and complete. In particular, the Company's officers (including senior financial officers) and directors shall endeavor to promote full, fair, accurate, timely and understandable disclosures in the Company's public communications, including documents that the Company files with or submits to the U.S. Securities and Exchange Commission and other regulators. If you become aware of a materially inaccurate or misleading statement in a public communication, you should report it immediately to the General Counsel & Corporate Secretary or the Audit Committee of the Board of Directors.

Insider Trading

BlueLinx obeys all laws designed to protect the investing public regarding the use and disclosure of material information. Specifically, in your employment with BlueLinx, you may become aware of information about BlueLinx or other companies that has not been made public. The use of such nonpublic or "insider" information about BlueLinx or another company for your financial or other benefit not only is unethical, but also may be a violation of law. U.S. law makes it unlawful for any person who has "material" nonpublic information about a company to trade the stock or other securities of the company or to disclose such information to others who may trade. Specifically, you must not buy, sell or trade BlueLinx securities or the securities of other companies about which you have insider information until that information becomes public. Violation of such laws may result in civil and criminal penalties, including fines and jail sentences. BlueLinx will not tolerate the improper use of insider information. These prohibitions also apply outside the U.S.

Material inside information is information which is not available to the general public, and which could influence a reasonable investor to buy, sell or hold stock or securities. While it is not possible to identify in advance all information that could be viewed as material inside information, some examples might include nonpublic information about: BlueLinx's financial performance, including earnings and dividend actions;

acquisitions or other business combinations; divestitures; major new contracts, products or service announcements; and other significant activities affecting BlueLinx.

You cannot evade the Insider Trading laws by acting through anyone else or by giving inside information to others for their use even if you will not financially benefit from it. If you have any doubt about what you can or cannot do in this area, you should consult with the General Counsel & Corporate Secretary. Special trading rules may also apply to certain designated “insiders” of BlueLinx, as set forth in the Company’s Insider Trading Policy.

Competition Laws

The Company is committed to ensuring a healthy, competitive marketplace that benefits both business and consumers alike. As such, the Company and BlueLinx Associates must strictly comply with competition laws (known in the United States and other countries as antitrust laws) in effect in the jurisdictions where it conducts its business. Such laws govern the relationships both between the Company and its competitors as well as those between the Company and its customers and suppliers. It’s important to understand and comply with the specific procedures governing the Company’s business and jurisdiction regarding contacts with competitors and customers, obtaining and handling competitors’ data and participating in trade associations and professional societies. The Company may from time to time have policies regarding competition laws, including the BlueLinx Antitrust Policy, and should be consulted for additional information.

Competition laws differ among jurisdictions, but in general, agreements between competitors that limit competition are prohibited. Oral discussions, understandings (express or implied) and informal arrangements may be considered “agreements”, so BlueLinx Associates should be careful whenever they meet with competitors, including contacts at trade shows, industry associations or other professional gatherings. BlueLinx Associates shall not propose any “agreement” with a competitor regarding any aspect of the competition for the sale to third parties of goods or services.

Environmental Protection

BlueLinx operates its facilities in compliance with applicable environmental laws, regulations and permits. This includes those governing the control, transportation, storage and disposal of regulated materials as well as air emissions, wastewater, solid waste, hazardous waste and storm water.

BlueLinx will not tolerate the falsification of data or the reporting of false information regarding environmental compliance to government agencies or within the Company. Each representative of BlueLinx must respond promptly and professionally, in accordance with applicable procedures, to any potential threat to human health or the environment from the Company’s operations. Each representative of BlueLinx also is required to bring to the Company’s attention any violation of environmental law or BlueLinx environmental policies.

Taxes

All persons employed by the Company must comply with all applicable laws, including tax, social security and currency control laws, of their principal place of employment.

Use of Material, Software and Technology

Copyright protects original written and artistic works, including software, from unauthorized copying. Copyright infringement results from unauthorized copying of publications or other print media, fine arts, photographs and graphic displays or designs. Infringement can subject you and the Company to civil remedies and/or criminal penalties.

Computer software is usually sold subject to license agreements which almost universally restrict use of the software. You cannot copy software or use it on a different computer unless the license agreement permits.

The importation of information, products or technology (including software) must fully comply with all applicable customs regulations. No BlueLinx Associate should participate in any activity that attempts to illegally or fraudulently avoid duties, taxes or other local customs requirements.

CONFLICTS OF INTEREST

Ethical conduct on the job is a matter of dealing fairly and honestly with the Company, fellow BlueLinx Associates, customers, suppliers, competitors, investors and the public in general. Every BlueLinx Associate has a duty to avoid financial, business or other relationships that might be opposed to the interests of the Company, or which might cause a conflict with the performance of his or her duties. Such a conflict would occur when any outside activity or investment interferes with or influences a BlueLinx Associate's independent and objective judgment in the best interests of the Company. BlueLinx Associates have an obligation to conduct the Company's business in an honest and ethical manner including, among other things, the ethical handling of actual, apparent and potential conflicts of interest between personal and business relationships. This includes full disclosure of any actual, apparent or potential conflicts of interest, and may include pre-approval of certain transactions, arrangements or relationships under applicable Company processes or policies.

The employment of relatives can cause various problems, including potential favoritism and conflicts of interest. These problems may work to the disadvantage of both BlueLinx and BlueLinx Associates. Supervisors, managers and any other individual in a supervisory/managerial position should not engage in romantic relationships with subordinates or any BlueLinx Associate over whom the supervisor manages, directly or indirectly, the other associate.

BlueLinx Associates should not occupy a position such as member of the board of directors, officer, employee, representative, agent or consultant of a supplier, customer, trade association or competitor unless previously authorized by the General Counsel & Corporate Secretary.

Special rules also apply to directors and executive officers who engage in conduct that creates an actual, apparent or potential conflict of interest. Those rules, and related Company processes and policies, may require directors and executive officers to make full disclosure and seek prior approval from the Company's Board of Directors or a committee thereof before engaging in such conduct.

Gifts and Entertainment

All BlueLinx Associates must engage with those who are doing, or seeking to do, business with the Company in a completely impartial manner, without any consideration other than the best interests of BlueLinx and the requirements of applicable law. In the context of business entertainment and gifts, this means that all BlueLinx Associates must adhere to the principle that such activities are intended only to

create goodwill and sound working relationships, not to gain or provide any unfair advantage. Gifts or entertainment may only be offered, given, provided or accepted by any representative of BlueLinx, or any family member of such representative, if such gift or entertainment:

- is not a cash gift;
- cannot reasonably be construed as a bribe, payoff, or attempt to influence your business judgment; and
- does not violate any laws or regulations.

You must discuss with your supervisor or manager any gifts, trips, tickets, meals or gratuities or proposed gifts, trips, tickets, meals or gratuities that you are not certain are appropriate. Any appearance of impropriety must be avoided. In the absence of any travel and entertainment policy that establishes different thresholds or pre-approval processes, BlueLinx Associates may only accept gifts, trips, tickets, meals or gratuities as follows:

- Gifts, trips, tickets, meals or gratuities valued under \$200 may be accepted without prior email disclosure to your supervisor. However, prior email disclosure to your supervisor must be made if the provider of the ticket does not accompany the BlueLinx Associate to the event.
- Prior email disclosure to your supervisor must be made within a reasonable period before offering or accepting gifts, trips, tickets, meals or gratuities beyond common courtesies valued at greater than \$200 but less than \$500 in the aggregate.
- Gifts, trips, tickets, meals or gratuities valued at \$500 or greater in the aggregate may be accepted only with prior approval from a supervisor.
- If an individual not employed by BlueLinx, such as a spouse or dependent, will participate in any gifts, trips, meals or gratuities that require disclosure as set forth in this Section of the Code or in any related policy, you must include this information in your disclosure.

Gifts received which are unacceptable under this Code or any related policy must be returned to the donor or turned over to the Company.

Marketing practices related to giving gifts may differ. Under no circumstances, however, may improper or illegal payments be made, directly or indirectly, or may commissions or other compensation be given to BlueLinx Associate of customers or their family members or associates, to induce action by a business.

Procurement Practices

It is the Company's practice to make purchases based solely on quality, service and price. Procurement decisions are based upon business benefit to the Company and its customers. It is a violation of this Code to seek, obtain or retain business by agreeing to purchase supplies from a supplier without regard to quality, service and price.

BlueLinx Associates may not use or attempt to use their position to derive a personal benefit for themselves or members of their immediate family from a current or prospective customer, supplier or service provider.

Contracting Practices

BlueLinx Associates may not imply that they have the authority to bind the Company or make commitments which BlueLinx Associates are not authorized to make. Only certain executives and designated management level employees ("Authorized Signatory") are authorized to enter into agreements on behalf

of the Company and only within their approved authorization limit as set forth in the Company's applicable authorization policy. All agreements to be entered into must be in accordance with the Company's business practices, including any applicable contract and authorization policies, to ensure that decisions are based upon sound economic analysis.

It is against Company practice to extend customers, suppliers or service providers preferential treatment, such as unauthorized services, contract terms or rates. If the circumstances warrant modifications to standard customer agreements, they must have appropriate management approval.

You must monitor executed contracts to ensure contract requirements are adequately identified and communicated to the personnel responsible for such contract's performance. Additionally, you should not substitute any contract requirements without prior written authorization.

Personal Loans

Section 402 of the Sarbanes-Oxley Act of 2002 prohibits a company whose securities are registered and publicly traded from lending money, directly or indirectly, in the form of a personal loan, to any director or executive officer. The prohibition contains certain limited exceptions and practices with respect to directors and executive officers that may be violative of Section 402 include some forms of cashless exercise of stock options, employee credit cards, split-dollar life insurance plans, advances of relocation expenses and advances of litigation expenses. Accordingly, although these extensions of credit may appear to be business, rather than personal, in nature, the existence of a potential loan or of arranging for a potential loan to an executive officer or director should be addressed with the General Counsel & Corporate Secretary.

BlueLinx Associate Commitment

BlueLinx Associates are expected to devote their full time and energy to Company business during their working hours for the Company. You may not engage in outside activities that create a conflict of interest, violate any other Company policy, or adversely affect your ability to perform your job. Under certain circumstances, if your personal conduct adversely affects your performance on the job or makes it impossible for you to carry out any or all of your job duties while at work, appropriate disciplinary action up to and including termination of employment may be appropriate.

Consultants

All arrangements with consultants should be by written contract and based on the Company's need for technical or professional advice or assistance. The background and professional ability of any new consultant should be reviewed carefully, and only competent individuals should be retained. Consultants must abide by this Code. Any BlueLinx Associate retaining a consultant should provide a copy of this Code to the consultant.

GOVERNMENT RELATIONS

The Company is committed to ensure that all BlueLinx Associates conduct business with government representatives, employees, and officials with the highest ethical standards. You must act in compliance with all applicable laws and regulations, including those directly related to government transactions. You must ensure that proposals, statements and contracts submitted to government representatives or agencies are accurate and complete and that no deviation will be made from such documents without the proper consent from an authorized government official.

Improper Payments

BlueLinx Associates are required to comply with the anti-bribery and anti-corruption laws of the countries in which we do business, including the United States Foreign Corrupt Practices Act (“FCPA”). The Company, its employees, officers and directors are prohibited from giving money or other value to any agent, person or firm where there is reason to believe that the remuneration will be passed to the government, party or official in order to obtain influence or favors. Bribes, kickbacks, payoffs or other unusual or improper payments to obtain or keep business are strictly forbidden. You should become familiar with and follow Company procedures related to international transactions, including the BlueLinx Anti-Bribery and Corruption Policy.

If you are required, as part of your responsibilities and functions, to provide reasonable business entertainment to third parties in the conduct of international business, you should not receive or give anything of value, unless previously authorized by a member of the Executive Leadership Team. “Anything of value” includes both tangible benefits and intangible benefits. If you are uncertain of what could be perceived as valuable, be sure to verify this with your immediate supervisor, or the General Counsel & Corporate Secretary.

Investigations

It is Company policy to cooperate fully with any government investigation. The General Counsel & Corporate Secretary will coordinate such activities. If you are subpoenaed or contacted in any way by any United States or non-United States federal, state or local regulatory or law enforcement agency, or in connection with any court proceeding, you should immediately contact the General Counsel & Corporate Secretary.

BlueLinx will not tolerate retaliation of any kind against anyone for lawfully providing to the Company or any law enforcement or other governmental agency any information or assistance relating to the violation of any law, rule or regulation applicable to the Company.

Please see Protected Rights for additional information about your rights.

Trade Compliance

The Company must always maintain strict compliance with import and export laws and trade controls. These include: (i) government-imposed export controls, trade sanctions, and boycotts that place restrictions on the exports of certain items to particular destinations or parties or for specific end uses; (ii) anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not sanctioned by the United States; and (iii) laws mandating the proper classification of products for import or export. Violations of international trade laws have the potential to subject the Company and individual employees to criminal and civil liability and the revocation of import/export privileges.

EQUAL EMPLOYMENT OPPORTUNITY & WORKPLACE SAFETY

Equal Employment Opportunity

BlueLinx provides equal opportunity in all aspects of employment. We forbid discrimination based on any legally recognized basis, including, but not limited to: race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, transgender status, gender identity, age (40 and over), national origin or ancestry, physical or mental disability, genetic information (including

testing and characteristics), veteran status, uniformed servicemember status or any other status protected by federal, state or local law. We also forbid verbal or other conduct that disparages any individual or group on account of race, sex or any other protected characteristic or that contributes to a racially, sexually or otherwise offensive, intimidating or hostile working environment prohibited by the Company's policies. All forms of such conduct are prohibited.

Every BlueLinx Associate is required to follow our policies against discrimination and harassment and to bring to the Company's attention any action that does not comply with these policies, including the policies included in the Employee Handbook, or our commitment to equal employment opportunity. Supervisors and managers must be watchful for any signs that our policy is not being followed and must see that any possible violations are immediately referred for investigation, whether or not there has been a formal complaint. The failure of a manager or supervisor to report a violation will result in appropriate disciplinary action. Each BlueLinx Associate is obligated to understand and comply with the Company's Equal Employment Opportunity Policy.

Any BlueLinx Associate who feels he or she is the victim of prohibited discrimination, harassment, or retaliation is encouraged to report such complaint as soon as possible in accordance with the Company's Employee Handbook, as applicable. Each complaint will be investigated promptly and thoroughly, and appropriate remedial measures will be taken if misconduct is found to have occurred. Information obtained during investigations will be kept confidential to the extent possible. The Company will not tolerate adverse treatment of a BlueLinx Associate because he or she reports in good faith harassment or discrimination, provides information relating to such complaints, or otherwise opposes any discriminatory practice.

Workplace Safety

It is the policy of BlueLinx that its operations be managed to protect the health and safety of its BlueLinx Associate and the communities where it conducts business. Many of BlueLinx's safety rules are based on legal requirements of the United States Occupational Safety and Health Administration ("OSHA"). In addition, we have policies which supplement OSHA regulations to protect the safety of BlueLinx Associates and others. Accident prevention depends on the cooperation and active support of all BlueLinx Associates. We require our managers to devote to safety the same focus as is given to other aspects of our operations and require BlueLinx Associates to follow safe work practices in the interest of their own safety as well as that of fellow BlueLinx Associates and others on site.

BlueLinx is dedicated to maintaining a safe and productive workplace. While some substances may be legal under certain state laws, we enforce a zero-tolerance policy regarding the presence of such substances in the workplace or in the systems of employees while on duty. Alcohol and drugs lead to situations that can endanger the individuals using these substances, those of us who work with them, our customers and suppliers, and others in our communities. Misusing controlled substances or selling, manufacturing or distributing drugs or alcohol or possessing, using or being under the influence of drugs or alcohol in the workplace or while on Company business or in Company vehicles is prohibited. Acting violently, or threatening violence to anyone while involved in any Company activity or on any Company property is prohibited. In addition, possessing firearms or other weapons while involved in any Company activity or on any Company property is generally prohibited, except in limited circumstances with prior approval from the General Counsel & Corporate Secretary.

Additional safety measures may be specified in the Company's local distribution facility to address location-specific conditions. BlueLinx Associates are required to bring to BlueLinx's attention any violation of safety policies and procedures.

REPORTING VIOLATIONS

While the Company's officers and executive management team have responsibility for establishing a compliance framework for the Company, you are responsible for reading, understanding and complying with this Code.

You are required to watch for and report immediately any suspected violation of the Code or unusual business practice to the Vice President, Human Resources or the General Counsel & Corporate Secretary. Alternatively, suspected violations can be reported through the Company's Business Conduct and Ethics Hotline. Unusual business practices include, without limitation:

- financial results that seem inconsistent with underlying performance;
- inaccurate financial records (for example, overstated expense reports, time sheets or invoices);
- endeavors that are inconsistent with good business economics;
- discussions or agreements with competitors related to pricing, terms of sales, product or service offerings, dividing sales territories or allocation of customers or product lines;
- the unauthorized release of confidential information;
- improper deviations from contracts;
- unusual payment requests (such as up-front payments, abnormal commissions or midstream requests for additional compensation);
- possible unethical practices (such as preparing false documents or press reports); and
- the lack of concern about product quality, training or warranty.

If you have any questions or are uncertain about whether a potential act would be considered a violation, you should contact either the Vice President, Human Resources or the General Counsel & Corporate Secretary. BlueLinx maintains a firm policy against retaliation, as further described below under "Non-Retaliation."

Non-Retaliation

BlueLinx maintains a firm policy against retaliation. It is strictly prohibited for any BlueLinx Associate to retaliate, directly or indirectly, or encourage others to do so, against any other BlueLinx Associate for reporting, lawfully and in good faith, a violation. Retaliation is broadly defined to include adverse actions like termination, demotion, suspension, or any employment decision that adversely impacts an employee's status because they have engaged in protected activities. Any BlueLinx Associate who believes retaliation has occurred should immediately inform the General Counsel & Corporate Secretary or the Vice President, Human Resources. BlueLinx is committed to ensuring that such reports are investigated promptly and impartially. Disciplinary action, which would extend to termination, will be enforced should such retaliation be verified.

Protected rights

The Company does not limit any BlueLinx Associate's ability to file a charge or complaint with the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration, the SEC or any other federal, state or local governmental agency or commission

("Government Agencies"). BlueLinx Associates are not prohibited or otherwise precluded from communicating with any Government Agencies or participating in any investigation or proceeding that may be conducted by any Government Agency, including providing documents or other information, without notice to BlueLinx. This Code does not prohibit or otherwise limit any BlueLinx Associate from receiving an award for information provided to any Government Agencies.

Business Conduct and Ethics Hotline

You may use the Business Conduct and Ethics Hotline, which is maintained by a third party retained by the Company. Though BlueLinx Associates are encouraged to identify themselves to assist the Company in addressing concerns effectively, you do not have to reveal your identity in order to make a report through the Hotline. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation and to the extent permitted by applicable law.

The Business Conduct and Ethics Hotline number is **877-460-BLUE**. The Hotline can also be accessed, and reports made, online by going to: www.bluelinxco.ethicspoint.com. The Hotline is available 24 hours a day, 7 days a week.

Duty to Cooperate

Compliance with the Code may be monitored by audits performed by the executives of the Company. You are required to cooperate fully with any such audits and to provide truthful and accurate information.

Discipline and Sanctions

Any BlueLinx Associate violating any provision of this Code may be subject to discipline, up to and including termination of employment. Where appropriate, the Company will not limit itself to disciplinary action and may pursue legal action against offending BlueLinx Associates and other individuals involved. In some cases, the Company may have a legal or ethical obligation to call violations to the attention of appropriate enforcement authorities.

Waivers of the Code

The Company will waive application of the policies set forth in this Code only where there exist specific circumstances warranting the grant of a waiver. Waivers of this Code for directors and executive officers may be made only by the whole Board of Directors or the Audit Committee of the Board of Directors and must be promptly disclosed as required by law or regulation.

COMMUNICATION

Company Communication Tools

It is Company policy to maintain a secure environment for the exchange of business information, e-mail and the Internet. Occasional and incidental use of Company email or the Internet for personal reasons is permitted if it does not interfere with the performance of the BlueLinx Associate's job functions. The Company may from time to time have other policies regarding the acceptable use of communication tools and the Internet that supplement this Code, including the BlueLinx Information Technology Acceptable Use Policy, and should be consulted for additional information. The Company also provides guidelines for using the Company's systems, software, computers and other business equipment to ensure security,

confidentiality of information and proper legal use. All BlueLinx Associates are expected to be familiar with and comply with these guidelines.

To ensure a safe, healthy and productive workplace, the Company may monitor BlueLinx Associates with respect to their business and personal use of Company resources (including e-mail, computers, Internet, Intranet, facsimile machines, telephones, voicemail and other resources). Company practices in this area will comply with applicable laws.

Social Media

BlueLinx Associates who engage in social media activity must be aware their postings could have an adverse effect on the Company's reputation or business interests. Social media activity includes all posts and other communications on the Internet, including but not limited to posts of photos, videos, articles or statements, or comments on social networking or affinity sites, employee engagement platforms, and other media-sharing sites, whether controlled by the Company or otherwise. A BlueLinx Associate's social media activity is subject to the Code, the Company's Social Media Policy, and any other Company policies.

Marketing Conduct

The use of false or misleading statements to sell or market Company services and products is strictly prohibited. Customers should receive accurate information. You should immediately correct any misunderstanding that may exist with a customer or potential customer.

Advertisements for Company products and services should be fair, accurate and comply with applicable law. Any objective statements should be based on sufficient data or other factual studies. Comparisons with competitive services should be balanced, accurate and verifiable.

Media Relations

Only authorized individuals may speak to the media on the Company's behalf. To ensure that the Company communicates with the media in a consistent, timely and professional manner about matters related to the Company, you should direct all media inquiries for comment on the Company's behalf to the General Counsel & Corporate Secretary.