

Overview

USG's mission is to provide the finest building solutions to our customers. Our mission reflects our core values of safety, quality, integrity, service, efficiency, innovation, and diversity. Consistent with these values, we maintain the highest ethical standards and must comply with both the letter and spirit of the law. Accordingly, all employees and other representatives of USG, wherever we do business, are responsible for complying with this Code of Business Conduct.

Our ability to achieve our mission begins with our dedicated employees, who have a proud record of living our core values. To provide continuing guidance, USG's Code of Business Conduct sets forth the rules that apply to all employees and directors of USG, wherever we do business. When we refer to "USG" or the "Corporation" in our Code of Conduct, we mean USG Corporation and all of its wholly owned subsidiaries. USG is also a subsidiary of Knauf (Gebr. Knauf KG). Knauf has a Code of Conduct which reflects the same principles and values, such as lawful and ethical business conduct, fair competition, anti-corruption, fair conditions of employment, and protection of confidential data. You should be familiar and comply with Knauf's Code of Conduct, as well as USG's Code of Business Conduct.

Responsibilities Covered by the Code of Business Conduct

Avoiding Conflicts of Interest

Our business decisions must be based on the best interests of USG and not on our personal interests. We must avoid "conflicts of interest," or situations where our personal interests may interfere with (or appear to interfere with) making the best, objective business decision for USG.

Protecting USG Assets

We have a duty to protect the assets of USG. USG assets include its physical property as well as its intangible assets, such as patents, trademarks, trade secrets, business and strategic plans, and know-how. We also have a duty to use USG assets only for USG business and in compliance with the law.

Obeying the Law

There are many laws that apply to our business, including laws relating to important matters such as safety, protection of the environment, fair competition, and financial integrity. It is our obligation to comply with the laws and to be informed about the laws that apply to our areas of responsibility. It is also our responsibility to seek legal guidance if we have questions about our legal obligations.

Protecting the Integrity and Accuracy of Our Records

We are all responsible for ensuring that USG records are accurate and complete. This is consistent with our core value of integrity, meeting our financial reporting obligations, and the continued growth and success of USG. We are also required to maintain certain records for specific periods of time. Specific record retention guidelines are available on usgconnections.com in the Policies section.

Protecting the Quality and Integrity of Our Workplace

We are committed to providing a workplace that is safe, respectful, and encourages excellent work and professional growth. As part of that commitment, we provide equal employment opportunity in all areas of our business and shall not unlawfully discriminate against any employee or applicant on the basis of race, gender, age, religion, national origin, veteran status, or non-disqualifying physical or mental disability, race, color, gender, national origin, age, non-disqualifying physical or mental disability, sexual orientation, transgender status, sexual identity, genetic information, or any other factor or criteria prohibited by law. We will not tolerate sexual or other harassment.

Responding to Legal Matters

It is important that legal matters involving USG come to the attention of the right people so that we can properly and timely respond. All employees are required to follow our guidelines for dealing with legal matters, which are outlined later in our Code of Business Conduct.

More specific guidance on each of these rules of conduct is provided on the next pages and contact information for questions or reporting concerns is at the end of this document.

Note: Every salaried employee and hourly supervisor of USG is required to thoroughly read the Code of Business Conduct and certify their compliance. If you have questions, talk to your supervisor or the USG Legal Department. All employees are required to comply with the Code of Business Conduct. All employees are obligated to report any violation of the Code of Conduct of which they are aware and cooperate in the investigation of any alleged violation

Avoiding Conflicts of Interest

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Identifying Conflicts of Interest

The first rule with regard to conflicts of interest is to identify situations where a conflict of interest may exist. Although it is not possible to list every situation that might create a conflict of interest, here are some examples:

- Receiving gifts, entertainment, or free travel from suppliers or other people who do business with us or want to do business with us.
- Having personal financial dealings with someone who does business with us or wants to do business with us.

These are considered conflicts of interest because the fact that a supplier or customer gives you something valuable or you have personal business dealings with a supplier or customer might influence your objectivity in making business decisions on behalf of USG.

Reporting Conflicts of Interest

The second rule is that you must report any situation where you think a conflict of interest might exist, whether that situation involves you or someone else. Do not decide for yourself whether a conflict of interest is serious enough to report it—you have an obligation to report it so that we can make the right judgment about what to do and to ensure that we are consistent in how we handle conflicts of interest. Some conflicts are minor and are not likely to affect someone’s decision-making (an example is where a relative works for a supplier, but the relative’s job does not involve USG business). Some conflicts of interest can be handled by putting controls in place to monitor the conflict, such as having a more senior manager review the business relationship on an ongoing basis. In all cases, however, USG must be made aware of the facts in a timely manner. There are several ways to report conflicts of interest. Many USG employees complete an annual or quarterly online certification reporting conflicts of interest. If you do not complete an online certification or you become aware of a conflicts of interest situation after your certification, you should report the conflict of interest promptly. The same is true if you are not sure a situation is actually a conflict of interest, but it might be. At the end of

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this Code of Conduct, there is a section that tells you how you can report conflicts of interest and where to go with questions.

Additional guidelines on conflicts of interest are on the next few pages.

Note: Information about reporting conflicts of interest is at the end of the Code of Conduct. We will not tolerate retaliation against anyone who in good faith reports a violation of our Code of Conduct.

Guidelines Regarding Gifts or Other Things of Value

Gifts: You should not accept gifts or things of value from anyone who does or seeks to do business with USG. However, it is acceptable to receive promotional items or similar gifts of small value (such as a logo shirt, tote bag, or holiday food basket) so long as they are consistent with generally accepted practices in our industry. Any supplier incentive programs that involve merchandise or other items of value must be approved in writing by a member of the Leadership Team.

If you receive an inappropriate gift in a situation where you reasonably believe it would be harmful to business relations to refuse or return the item, you must promptly report the situation to a member of the Business Ethics Committee, which will decide on how the matter should be handled. (Contact information is at the end of the Code of Conduct.)

Entertainment: It is acceptable to receive entertainment (such as a ticket to a sporting event, a golf game, or an invitation to dinner or lunch) so long as the entertainment is not excessive or inappropriate in type, amount, or frequency. Joining a supplier at a sporting event, a meal, or other outing is an opportunity to gain understanding about our businesses and to build relationships. For example, being taken to a local baseball game by a supplier is probably okay but being provided free airfare and hotel to see a sporting event is something that should be reviewed and approved by your manager in writing in advance. The basic rule of thumb is that if it would look questionable to an impartial third party, you shouldn't be receiving (or giving) it.

Discounts or free goods or services: You should not accept free or discounted goods or services from anyone who does or seeks to do business with USG. This rule does not apply to discounts that are available to the general public. **Travel and Lodging:** You should not accept free travel or lodging unless it is for a business event and has been approved in writing by your manager.

Money or Loans: You should never accept a gift of money from anyone who does or seeks to do business with USG. You should not receive a loan from anyone that does or seeks to do business with USG, other than on terms that are generally available to the public (such as a credit card).

Gift Cards: We discourage giving or receiving gift cards. Although, strictly speaking, gift cards are not cash, they are similar. If you receive a gift card or cards that are more than \$20 in value (individually or in the aggregate), you must report it. As mentioned above, any supplier incentive programs that involve gift cards or merchandise must be approved in writing by a member of the Leadership Team. (This rule regarding gift cards does not apply to gift cards a USG manager might give to his or her own staff. That situation is addressed by separate internal USG policies.)

General Rule: In addition to the specific guidelines above, you should not accept anything of value, including gifts, entertainment, travel, lodging or anything else, if the amount or frequency is excessive or the situation looks like you or USG are being influenced to do something in exchange. Also, you should never request gifts, entertainment, travel, lodging, or anything else of value from anyone who does business with us or seeks to do

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business with us. These same rules regarding receiving gifts or other things of value apply to the receipt of such items from anyone who does or seeks to do business with Knauf.

Note: These conflicts of interest rules apply to our family members as well. In other words, a family member should not receive anything from a company or individual that does (or seeks to do) business with USG or Knauf if it would not be okay for you to receive it. If you become aware of such a situation, you must report it.

Rules That Apply to Our Customers

The same conflict of interest rules apply to dealing with our customers. We should never give any gifts, free travel or entertainment, or anything else of value to a customer or potential customer that would appear to improperly influence the customer or would violate the policies of his or her company. Any customer incentive programs that involve merchandise, gift cards, or other rewards must be approved in writing by a member of the Leadership Team. Paying for travel or lodging for customer trips must be approved in writing by your manager.

It is absolutely a violation of USG's Code of Conduct and its values to offer or give kickbacks or bribes.

Guidelines Regarding Personal Dealings with Suppliers or Customers

Personal Financial Dealings: You should not have personal financial dealings with anyone that does or seeks to do business with USG, unless those dealings are disclosed in writing and are approved in writing. Contact information for disclosing this type of situation is at the end of the Code of Conduct. For example, you should not have ownership in a company that does business with USG unless that situation has been reported and approved in writing. (There is an exception that relates to owning stock in public companies, which is discussed below.)

Business Dealings Between Your Relatives and USG: If someone in your family works for a company that does business with USG, you need to disclose that situation. For example, if your brother-in-law runs a construction company that purchases products from a USG company or your husband works for a supplier, you need to disclose that situation so we can make sure that we are dealing with the company on an arm's-length basis. Most (but not all) of the time these situations do not raise a concern, but they still have to be reported.

Owning stock in companies that do business with USG: USG does business with some large, publicly traded companies. As a general rule, you do not need to disclose the fact that you own stock in one of these large companies. This is because it is highly unlikely that your ownership of stock would have any impact on how we do business with that company. However, there are different rules that apply to directors or executive officers that might be in a position to influence our business with such a company. For those people, they do need to disclose stock ownership if the amount of stock they own is significant and the amount of business we do with the company is significant.

Special Guidelines Regarding Government Officials

You should not give **any** gifts or provide **any** entertainment or travel to any government official without obtaining approval in advance from the Legal Department. There are laws in virtually every country where we do business that strictly regulate this area. For more information, see the section "Laws Regarding Political Contributions or Lobbying."

USG's Code of Business Conduct Cont.

Guidelines Regarding Outside Activities That May Impact USG

There may be certain situations where your outside activities may impact USG, such as when you are involved in an organization whose activities impact our business. An example would be serving on a local zoning board approving construction projects or serving on the board of a company that does business with USG. We need to be aware of this type of activity to ensure that USG is not involved in a conflict of interest. Therefore, you should always obtain approval from the Legal Department before doing any of the following:

- Serving on the board of another company, a government agency, or a trade association.
- Having any involvement in a business that competes with USG.

USG reserves the right to decide whether this type of outside activity is not consistent with our best interests. While problem situations are rare, if they do occur, USG will discuss the matter with the employee. If the matter cannot be resolved to USG satisfaction, USG reserves the right to terminate the employee's employment.

Summary

We have listed above some important guidelines about conflicts of interest, but this is really the bottom line: You should not be in a situation where it might appear that your business decisions are based on what is in your personal best interests and not in the best interests of USG. The only financial benefit you should receive from your position at USG is the compensation or other benefits you receive from the company. Any situation that might be inconsistent with this basic standard should be reported.

Protecting USG Property, Information, Technology, Funds, and Other Assets

We have a duty to protect the assets of USG. We also have a duty to use USG assets only for USG business and in compliance with the law.

What are USG assets? USG assets include not only USG **physical property** such as inventory, equipment, and computer systems, but also **intangible things** such as USG **funds**, and USG **trademarks, patents, technology, processes, business plans, and confidential business information**. USG assets also include the work time of our employees.

The Value of USG Assets: USG physical assets, such as our equipment, inventory, and facilities, are of significant value to our business. Our intangible assets also have a tremendous value. We spend enormous resources on researching, developing and promoting products, manufacturing processes, and business best practices that will serve our customers, grow the USG name and brands, and continue our leadership in the industry. As a result of our efforts, we have obtained patents, trademarks, knowhow, and other intellectual property of extraordinary value to our business. We also spend significant resources on analyzing our industry and developing plans for our growth and resource allocation. Our employees' work time is also a valuable intangible asset. We have an obligation to protect our intangible assets as well as our physical assets.

Protecting Confidential USG Information from Disclosure: One of our most important obligations in protecting USG intangible assets is to protect our confidential information from disclosure to the outside world. Our work would lose a great deal of its value if it were disclosed to others and our competitors in particular. Therefore, we all have a duty to guard confidential information of USG, such as business plans and strategies, financial information, and trade secrets, and not disclose or use it without permission. Each of us signs an agreement when we join the company promising to protect and not disclose USG confidential information. This obligation continues even if we cease being an employee of USG. This obligation, however, does not prevent the disclosure, in confidence, of confidential information to your attorney, a relevant government authority, or a court, solely

for the purpose of reporting a potential violation of law or solely for a claim alleging retaliation for reporting a violation.

Protecting Confidential Information Provided to Us by Third Parties: We also receive confidential information from people or companies with which we do business. This may include personal data (such as credit card or banking information) or confidential business information (such as confidential business plans or confidential financial or technical information). If we receive this information in confidence or have agreed to keep the information confidential, we must take appropriate steps to protect that information from disclosure to others.

Using USG Assets Only for USG Business and Only for Lawful Purposes: USG assets, whether physical or intangible, should only be used for the business of USG and only for lawful purposes. We should never use USG assets to compete with USG or use USG assets (including employee work time) for our personal business. (There is an exception for personal use of USG computer systems, but such use should be incidental and not interfere with your job. See **USG's Electronic Communications Policy** for more guidance.)

USG's name and trademarks are significant assets. It is important that you respect the proper use of USG's trademarks, brand names, and other intellectual property. Misuse of USG's trademarks, brand names, or other intellectual property may diminish their value. You should not use USG's trademarks, brand names, or other intellectual property in a way that makes it appear that USG is endorsing a non-USG product, organization, or event unless you have written permission from a Vice President in Marketing.

These rules regarding protecting USG's assets, confidential information, and intellectual property apply equally to Knauf assets, confidential information, and intellectual property.

Obeying the Law

It is our obligation to obey both the letter and the spirit of the law. We recognize that there are many rules and regulations that apply to our business, and not all are precisely worded or easy to understand.

Nevertheless, it is our obligation to be informed about the laws that apply to our areas of responsibility and to make good faith efforts to comply with the law. If you have any questions about what the right thing is to do, contact the people listed at the end of this Code of Conduct.

Below are some specific guidelines regarding laws that apply to our business:

Antitrust or Competition Laws

Every country where we do business has laws that are designed to preserve competition in the marketplace. These are called antitrust or competition laws. These laws are consistent with USG values of competing on the basis of superior products, service, and customer satisfaction, and not through anticompetitive practices. Consistent with our values and obligations, we are all responsible for complying with the antitrust laws. We have a more detailed **Antitrust Compliance Policy** that provides more specific guidance. This Code of Business Conduct focuses on only a few of the important guidelines for antitrust compliance.

First, we should never reach an agreement with our competitors regarding the prices we will charge for our products. This is strictly against the law and in many countries, including the United States, is a crime. Illegal agreements include agreements with our competitors on the prices we will charge for our products or on matters that directly impact prices, such as an agreement not to compete in certain territories or for certain customers, or an agreement with our competitors on how much we will produce. Agreements, whether expressed or inferred, with competitors on these topics are against the law.

Second, we should not have any discussions with our competitors about business, regardless of where these discussions take place. This includes discussions about prices, customers, business cycles, marketing plans, or

other business matters. Discussions on these matters could be misinterpreted as a step toward reaching an illegal agreement or understanding. If a competitor raises any of these topics with you, whether in a business or social setting, you should explicitly refuse to discuss the topic, remove yourself from the situation, and contact Legal. Any social contact with a competitor poses a risk that someone will think you are discussing business—so the best practice is to avoid these contacts. That is not always possible, but those contacts should never veer into discussions about business. There may be rare situations when you need to have a business discussion with a competitor, such as when a competitor is also a potential customer or a competitor is interested in supplying us with a raw material that they also produce. In those occasions, you should contact Legal before you have the communication with the competitor, to get guidance on how to proceed.

Third, we need to be careful about participating in trade associations that include our competitors, our customers, or our suppliers. While trade associations serve many pro-competitive functions, they also have risks because they can bring members of a single industry, including competitors, together in the same room. If you are involved in a trade association that involves our competitors, customers, or suppliers, you should thoroughly read USG's Antitrust Compliance Policy. If you are considering joining a trade association that includes our competitors, customers, or suppliers, you should contact Legal prior to joining the association to get further guidance. The requirement of getting pre-approval does not apply to large trade associations that involve members of many industries, such as the Chamber of Commerce, the National Association of Manufacturers or Kiwanis. However, the same guidelines to avoid communications with our competitors apply to these associations as well.

Anti-Bribery and Anti-Corruption Laws

In every country where we do business, there are criminal laws against bribery. In all countries, these laws prohibit bribery of government officials, whether elected or not, and all affiliates thereto. In many countries, there are laws that make commercial bribery a crime as well. **Regardless of the particular laws, it is strictly against USG policy to give or receive a bribe or to attempt to bribe anyone.** It is also against USG policy to give or receive kickbacks.

There are specific laws in most countries, including the U.S., which make it a crime to give or offer payments to foreign officials to influence their actions or get business. The purpose of these laws is to ensure integrity, transparency and overall fairness in global commerce. In the United States, the law is called **the Foreign Corrupt Practices Act (FCPA)**. The FCPA applies to USG Corporation wherever we do business. If you are involved in our international businesses, you should thoroughly read and comply with **USG's Anti-Bribery and International Trade Law Policy**. The Policy is available on usgconnections.com or you can contact the Legal Department for a copy.

Laws Regarding Political Contributions or Lobbying

Contributions to political parties, causes, or candidates is a heavily regulated activity. You should not use company funds for political activities, causes, or candidates unless you get written permission in advance from USG's General Counsel. The same goes for using employee time for political activities or reimbursing an employee for contributions. Lobbying is also a heavily regulated area, and, therefore, you should not use company funds for lobbying activities without approval from USG's General Counsel.

Safety, Health and Environmental Laws

There are many laws that regulate the health and safety of our workers, our customers, and our environment. If your direct responsibilities involve safety, environmental quality, or manufacturing, you should be familiar with these laws.

Fair Dealing Laws

We should not take unfair advantage of people we deal with through fraud, abuse of confidential information, or any other unfair dealing practice prohibited by law.

Protecting the Integrity and Accuracy of our Records

We are all responsible for ensuring that USG's records are accurate and complete. This is important to our owners, to meeting our financial reporting obligations, and to the continued growth and success of USG. We are also required to keep certain records for specific periods of time. Specific record retention guidelines are available on usgconnections.com in the Policies section.

Ensuring the Accuracy of our Records

Although it is important that all of our records be accurate and complete, this is particularly important with regard to our financial records.

We should never:

- Enter false, misleading or inaccurate information in company records
- Mischaracterize the nature or amount of payments in our records
- Disguise payments with fictitious, confusing or misleading entries
- Fail to record a payment or other transaction
- Mislead USG financial staff or our auditors about any transactions or payments
- Participate in any of the above

If you are aware of any misstatements or inaccuracies in our financial records, you have a duty to report it. Contact information is provided at the end of this document.

Note: USG will not tolerate retaliation against anyone who in good faith reports a violation of this policy. You can also report through our Business Ethics hotline. Contact information is provided at the end of the Code of Business Conduct.

Complying with Record Retention Guidelines

You should also be generally familiar with the Record Retention Guidelines that apply to documents you have responsibility for (the records retention guidelines are available at usgconnections.com). This includes both paper and electronic records. Some records need to be kept for specific periods of time (and should then be discarded at the end of the required period). Other records need to be maintained permanently. **However, any records that relate to a pending or expected lawsuit, claim or investigation must be retained regardless of the standard record retention periods until you receive instructions from the Legal Department.** For example, if there has been an accident or you are aware of a potential government investigation into a matter, you should not destroy records relating to that accident or matter without permission from the Legal Department, even if no lawsuit has yet been filed. There can be substantial penalties for destroying records that are relevant to a lawsuit, claim or investigation.

Protecting the Quality and Integrity of Our Workplace

We are committed to providing a workplace that is safe, respectful, and encourages excellent work and professional growth. As part of that commitment, we provide equal employment opportunity in all areas of our business and shall not unlawfully discriminate against any employee or applicant on the basis of race, color, gender, national origin, veteran status, age, non-disqualifying physical or mental disability, sexual orientation, transgender status, sexual orientation, genetic information, or any other factor or criteria prohibited by law. We will not tolerate sexual or other harassment, whether through words or conduct.

More detailed standards and rules relating to this guideline are available on www.usgconnections.com in the Human Resources section or may be obtained from your supervisor or Human Resources manager. If you are aware of any violations of our policies on these issues, you must report the violation. There are several ways you can make a report: you can report to your supervisor, your Human Resources manager, the Senior Vice President of Human Resources, or any of the people identified in our Quality of Worklife Policy. You can also report through our Business Ethics hotline. Contact information is provided at the end of the Code of Business Conduct. All reports will be immediately investigated and appropriate action, including termination if warranted, will be taken. We will not discriminate or retaliate against any employee for making a good faith report.

Responding to Legal Matters

It is very important that legal matters involving USG come to the attention of the right people so that we properly and timely respond. For example, if you receive a legal document directed to USG, such as a complaint, summons, subpoena, deposition notice, or notice of examination, you should immediately notify the Legal Department or, in the case of Human Resources matters, the Human Resources Department. (Routine wage garnishment matters can be forwarded to Human Resources or Payroll personnel.) In addition, you should not, on behalf of or as a representative of USG or Knauf, communicate with or provide documents to an outside attorney or investigator unless you have approval from the Legal Department or Human Resources Department. Similarly, you should not agree to testify, sign an affidavit, appear at a deposition, or agree to be an expert witness in a matter relating to USG or Knauf without permission from an attorney in the Legal Department or the Human Resources Department.

There are additional guidelines available on usgconnections.com (click on "Policies" and "Legal") regarding handling contacts by or visits from government or law enforcement agents, inspectors, or investigators, as well as handling other legal matters involving USG. If you are involved in any of these situations, you must consult those guidelines and/or contact the Legal Department.

It is also very important that documents relating to legal matters be preserved. You should not remove, destroy or alter any documents (paper or electronic) that may be relevant to a lawsuit involving USG or Knauf or to a government inquiry or investigation even if there is no lawsuit. Always consult with Legal before destroying, removing, or altering any documents that you think may be relevant to an investigation or lawsuit. There can be serious consequences, including prosecution, for destroying documents relevant to a government investigation or inquiry or any other legal matter.

Note

Please note that USG's Code of Business Conduct is an expression of management policy and should not be construed to create a contractual relationship with USG's employees. Employment with USG (including its subsidiaries) is terminable by either party without prior notice. All terms, conditions, and benefits of employment are unilateral expressions of current policy, and with the exception of employment at will status, may be changed at any time and for any reason with or without notice, at USG's decision. The employment at will status may only be changed through the written expression of the USG's Senior Vice President, Human Resources.

Who to Contact

If you have questions about USG's Code of Business Conduct or wish to report a violation of the Code, please contact:

USG Business Ethics Committee

312.436.5555

USGBusinessEthicsCommittee@usg.com

USG Business Ethics Alert Hotline

800.461.9330 (720.514.4400, outside the U.S.),
or

<http://www.usgethicshotline.com>

(This hotline is run by an independent third party,
and you may
report anonymously if you wish.)

To report potential conflicts of interest or ask questions:

Depending upon your position, you may be required to complete an online conflict of interest certification on a quarterly and/or annual basis. If you are not required to complete an online certification, you should report any potential conflict of interest situation to any of the contacts listed above. For those who do complete the online certifications and who become aware of a potential conflict of interest after a certification has been completed, you should report the situation to any of the contacts listed above.

All employees are required to report any violations or suspected violations of the Code of Conduct and cooperate in the investigation of such violations. USG will not tolerate retaliation against any employee who in good faith reports a violation of our Code of Business Conduct.

Last revised: April 9, 2025.

A printout copy of this Policy may already be outdated. Please always check USG Connections to determine whether this is the current version of this Policy.