

# TopBuild Corporation's Supplier Business Practices Policy

TopBuild prides itself on its reputation for honesty, integrity, and excellence in everything that we do. We therefore expect and require that all goods produced on our behalf or on behalf of any of the brands in the TopBuild family be made in facilities that meet specific criteria for human rights, working conditions and protection of the environment.

Our selection and continued use of our suppliers is based on the following standards with respect to all goods that we purchase:

1. Comply with all applicable laws and regulations.
2. Protect against the use of workers younger than the minimum age required by law.
3. Protect against the use of forced labor. (Including Slavery and Human Trafficking)
4. Provide appropriate wages and benefits as required by law.
5. Protect against excessive working hours that exceed local laws or business customs.
6. Protect against physical and mental punishment of workers.
7. Protect against unlawful discrimination against workers and encourage employment based on ability.
8. Respect workers' rights to associate freely.
9. Maintain safe and clean workplaces, including any residential facilities, in compliance with the law.
10. Protect our confidential and proprietary information.
11. Provide us all requested information regarding Conflict Minerals as set forth below.

In accordance with the SEC's Conflict Minerals Rule, we are implementing processes to identify whether tin, tantalum, tungsten and gold ("Conflict Minerals") are contained in our products, and, if so, whether the Conflict Minerals may originate from sources that directly or indirectly finance or benefit armed groups operating in the Democratic Republic of the Congo and surrounding countries. We expect our suppliers to source Conflict Minerals from suppliers who meet our Supplier Business Practices Policy requirements, to implement traceability measures for Conflict Minerals and to provide us with all requested information, including information about all suppliers in their supply chains, so that we can comply with the SEC's Conflict Minerals Rule.

We will not knowingly work with suppliers that do not respect these standards and those of our customers. We will periodically assess our supplier's compliance with these standards and those of our customers. Any reported non-compliance will be investigated and appropriate action will be taken. These standards apply whether the supplier is a TopBuild company, an affiliate, or a third party.