

Purpose

It is necessary to avoid even the appearance of impropriety in our daily business. Always doing the right thing means never making or accepting bribes or engaging in any other business conduct that could be viewed as corrupt. This Anti-Bribery and Anti-Corruption Policy ("Policy") provides specific guidance to help ensure compliance with applicable laws and to help protect the Company's business reputation and assets.

Scope

This policy applies to all US LBM associates and Divisions (collectively, "Associates"). Failure to adhere to this Policy may result in disciplinary action by the Company, up to and including termination of employment, and/or personal civil and criminal liability.

Anti-Corruption & Anti-Bribery Policy

The Company strictly prohibits all forms of corruption and bribery and will take all necessary steps to ensure that corruption and bribery do not occur in its business activities.

Bribery Generally

Bribery is the exchange of anything of value with the purpose of improperly influencing a decisionmaker. This Policy strictly prohibits all bribery, including bribery between Associates and: i) other Associates; ii) government employees, and iii) private parties (including vendors, suppliers, and customers). Basically, bribery is prohibited in all forms, direct or indirect, without exception.

Bribery can also result in violations of international and domestic civil and criminal laws, including the Foreign Corrupt Practices Act ("FCPA") and other anti-money laundering, mail and wire fraud, and conspiracy laws. The penalties for violating these laws are severe. In addition to being subject to the Company's disciplinary policies (including termination), Associates who violate anti-bribery and anti-corruption laws may also be subject to imprisonment and fines.

Giving & Receiving Gifts

Giving or accepting gifts does not necessarily violate this policy. Please see below:

- **Gifts to and from Government Employee:** Associates are prohibited from directly or indirectly making, promising, authorizing, or offering anything of value to a federal, state, or local government employee without first checking with the legal department.
- **Gifts to and from Everyone Else:** Associates must use good judgment when giving and receiving gifts and should check with the legal department if they are unsure about whether giving or receiving a gift is permitted. Generally, associates should never give or receive a gift if it is intended to influence business judgment or a pending or potential transaction, feels excessive, or is not connected to a legitimate business purpose. By way of example –



PEOPLE



PARTNERSHIPS



OPERATIONAL
EXCELLENCE



CONTINUOUS
IMPROVEMENT



EMPOWERMENT

attending a sporting event with a customer or vendor is likely permitted while offering a potential customer a \$500 gift card is not. Gifts that could create an actual or perceived conflict of interest (as further detailed in the Standards of Business Conduct and Personnel Handbook available on Building Connections) should be avoided. Accepting or receiving promotional items bearing a logo or insignia on an infrequent basis do not violate this Policy. Associates should also take special care to avoid giving gifts to recipients when such gifts knowingly violate the recipient's employer gift or other policy. If in doubt about whether a gift is permissible, please contact the legal department.

- **Gifts that Require Legal Department Approval to Give or Receive:**
 - Any gift to or from a government employee
 - Any gift being made to a person or entity outside of the United States
 - Any gift that an Associate believes may create a perceived conflict of interest or that may appear to be an attempt to influence an ongoing or future transaction
- **Important Note:** Gifts can take on many forms and are not always a physical item. Gifts can include paying or receiving payment for travel, meals, lodging, entertainment, or gift cards; receiving or giving loans; making, receiving, or directing charitable or political donations; and/or offering or receiving business, employment, or investment opportunities.



Reporting

Any Associate who suspects or has reason to believe this Policy has been violated is required to report the violation to the US LBM legal department or to the Company ethics hotline. If you are a supervisor who has received a report of a violation of this Policy, you are also required to immediately contact the US LBM legal department or submit a report to the Company's ethics hotline. Reports to the Company's hotline can be made anonymously.

Any Associate who, in good faith, reports suspected legal, ethical, or Policy violations will not suffer any adverse consequence for doing so. When in doubt about the appropriateness of any conduct, the Company requires that you seek additional guidance before taking any action that may subject the Company to potential FCPA or other legal liability.

Duty to Cooperate

The Company may, at times, undertake a more detailed review of certain transactions. As part of these reviews, the Company requires all Associates and third-party representatives to cooperate with the Company, outside legal counsel, outside auditors, or other similar parties. The Company views failure to cooperate in an internal review as a breach of your obligations to the Company. Failure to cooperate is grounds for termination of employment.

Questions or Concerns

For any questions or concerns about this Policy, please contact the Company's legal department.