

Purposes

As detailed in our Standards of Business Conduct, US LBM Holdings, LLC ("US LBM") and each of its subsidiary operating companies ("Divisions") are committed to always following the law and doing the right thing. Our Standards of Business Conduct address the important requirement that we always keep accurate books and records, and immediately report any suspected fraud or financial misconduct. This Policy is in addition to and elaborates on the US LBM Standards of Business Conduct and is meant to provide further guidance to all associates at US LBM and its Divisions (collectively, the "Company") related to identifying and reporting any suspected fraudulent or dishonest use or misuse of Company resources.

Scope

This policy ("Policy") applies to any suspected fraudulent or dishonest use or misuse of Company resources or property by any associate, consultant, contractor, supplier, or service provider, and to anyone who reports such activities. 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.

Fraudulent or dishonest use or misuse of Company resources or property means a deliberate act or failure to act with the intention of obtaining an unauthorized private benefit or personal gain. While it is impossible to predict or list all the possible manners that fraud or dishonest use or misuse of company resources can occur, some examples of conduct that may be subject to this Policy, if undertaken for unauthorized private benefit or personal gain, include:

- Forgery or other deliberate and wrongful alteration or destruction of Company documents or files in violation of the Company Data and Record Management, Storage, and Retention Policy;
- Unauthorized and wrongful alteration or manipulation of Company systems or databases;
- Misappropriating or misusing Company resources, including investment assets or the Company's relationships with suppliers;
- Knowingly authorizing or receiving payment or reimbursement by the Company for goods not received, expenses not incurred, or services not performed;
- Knowingly providing false or misleading information for the Company's filings with government agencies, including the Internal Revenue Service;
- Knowingly providing false or misleading information to the company's internal or external auditors;
- Knowingly violating the Company's Standards of Business Conduct or another Company policy addressing potential conflicts of interest and/or related party transactions;
- Knowingly manipulating or inaccurately documenting any matters in any company books and records;
- Unauthorized access, transfer, or deposit of Company funds or accounts; and
- Knowingly concealing, or failing to report, any known violation of this Policy.

While this list is not exhaustive, it is meant to provide some guidance on the type of conduct that violates the Company's Standards of Business Conduct and this Policy.



PEOPLE



PARTNERSHIPS



OPERATIONAL
EXCELLENCE



CONTINUOUS
IMPROVEMENT



EMPOWERMENT

This Policy does not apply to Associate activities that are protected under federal, state, or local law regarding the terms and conditions of employment, and associate complaints regarding workplace behavior or performance, which are handled under the Company's Personnel Handbook and Standards of Business Conduct.

Fraud & Whistleblower Reporting Policy

Required Reporting: Anyone who works for, does business with, or is otherwise part of the Company community is expected to act as a "whistleblower" by reporting suspected fraudulent or dishonest use or misuse of Company resources or property by Company associates, consultants, contractors, suppliers, or service providers.

How to Report: Reports may be made through any of several avenues, including Company supervisors; the Chief Financial Officer; or the Company General Counsel. Reports may also be made anonymously through our hotline at 1-844-605-7396, or through the online portal at uslbm.ethicspoint.com. The hotline is hosted by a third-party whistleblower and fraud reporting service retained by the Company. If you wish to make an anonymous report, you may do so through the whistleblower and fraud reporting service, which will not require you to give your name or other identifying information. Reports received via the whistleblower and fraud reporting service are automatically routed to the Chief Financial Officer and the General Counsel for follow-up.

Investigations: In keeping with Company's commitment to the highest standards of integrity and ethics, the Company will investigate all suspected fraudulent or dishonest use or misuse of its resources or property by Company associates, consultants, contractors, suppliers, or service providers. The Company General Counsel, in coordination with the Chief Financial Officer, or their designees, will determine the scope, staff, privilege, and investigation plan for each report received. Where appropriate, and based on the facts, the Company may decline to conduct an investigation in circumstances that clearly indicate no investigation is warranted or may assign an investigation to an external partner for further review.

Cooperation: All Company associates are expected to cooperate as requested in investigations of reports made under this Policy.

Confidentiality

Whistleblower reports, whether anonymous or not, will be shared only with those who have a need to know so that Company can conduct an effective investigation and determine an appropriate course of action. Those with a need to know may include such third parties as Company's external auditors, outside counsel, or law enforcement personnel to the extent necessary. Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower report, such persons may also have the legal right to know the identity of the whistleblower.

If you are a whistleblower, you are likewise expected to maintain the confidentiality of your report and any ongoing investigation and refrain from discussing these matters except as needed to assist Company with its investigation. You may also be asked to continue to maintain confidentiality after an investigation has been completed and any corrective action taken, depending on the circumstances. However, this Policy is not intended to restrict you from conduct that you have a right to engage in under law.

No Retaliation Against Whistleblowers or Witnesses

The Company will not tolerate retaliation against any person who makes a report in good faith under this Policy or against any individuals (including witnesses) who participate in an investigation of a report under this Policy. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if the allegations of retaliation are substantiated. This Policy will not prevent, limit, or delay the Company from taking action, including disciplinary or other employment action, against any individual, when the Company concludes that action is appropriate.

Reports are made in bad faith if they are made maliciously or with reckless disregard for their truth or falsity. If you make a report in bad faith, you may be subject to disciplinary or other employment action by Company and may also be subject to legal claims by the individuals about whom the bad-faith reports were made.

Questions or Concerns

For any questions or concerns about this Policy, please contact the General Counsel.

