

# IT STARTS WITH US



**The US LBM Standards of Business Conduct**



## A Message From L.T. Gibson

Our goal at US LBM is to be the best company in the building materials industry. To help us achieve our goal, we have established a culture of accountability, integrity, autonomy, respect, and continuous improvement. Every decision we make, across all business units and at all levels, must be guided by these principles, which allow us to build trust with our partners and deliver the outstanding level of service our customers expect and deserve.

No matter our job title, location, or business unit, each of us has a personal responsibility to behave according to our shared values and to set an example for our coworkers. These Standards have been created to capture those values, expectations, and policies. I ask that you please get to know our Standards and keep this document handy for future reference. Of course, our Standards cannot cover every situation, so please speak up and ask for help when you need to by contacting any of the resources listed on page 7.

Thank you for your dedication to living our values and driving our continued success.

L.T. Gibson, President and CEO

## Our Philosophies



### PEOPLE

We recognize the value of our associates and partners and treat them with integrity, candor, and respect. We understand that to have a truly successful organization, we must have satisfied associates. We create a safe, challenging, and rewarding environment for our associates while being active stewards of our communities.



### PARTNERSHIPS

We value our relationships with our customers, vendors, and partners. We treat our customers, vendors, and partners with care, respect, and integrity while delivering outstanding service. Great partnerships enhance our success.



### OPERATIONAL EXCELLENCE

We share best practices across all business units to maximize the value we bring to our customers, vendors, and partners and to make the US LBM family of companies stronger together.



### CONTINUOUS IMPROVEMENT

We are committed to continuous improvement in operations and efficiency. We will not allow “better” to get in the way of “best” as we continuously improve operations, setting the standard for which our competition is judged.



### EMPOWERMENT

We empower our business units and associates to make positive decisions for our organization. Each of our business units has certain autonomy to operate in the manner that best services their local market and customer base.

# The US LBM Family of Companies



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# Our Philosophies in Action

These Standards are our guide to staying true to ourselves. They are a statement of our values, beliefs, and expectations. They exist to help us succeed in our daily interactions with each other and with vendors, customers, partners, and members of the community. By following the Standards, we know we are acting in a way that complies with legal and ethical standards.

The Standards are named *It Starts With US* because everything that's good about the US LBM family of companies starts with its people. The Standards apply to everyone who works for or with the US LBM family of companies, including members of the Board of Directors, executives, presidents, officers, managers, associates, temporary workers, independent contractors, consultants, vendors, and partners. We are all expected to follow the Standards, our policies, and all legal and regulatory requirements that apply to us.

**“To stay centered on what’s most important from day to day, I focus on the people – the people who’ve been around me before US LBM existed and the people in our company today. I’m constantly learning from these people; they teach me something new each and every day. Together, we learn as we go, and I feel challenged every day. I think as long as we stay true to ourselves while keeping close watch over our customers’ needs, then the sky’s the limit for what we can become.”**

—L.T. Gibson, *The Story of US*

## Everyone’s Responsibilities

As associates, we are all responsible for making sure the US LBM family of companies achieves its goals ethically. When issues come up, we need to address them promptly and properly. We all should feel empowered to speak to a supervisor whenever we have questions or concerns. Our supervisors are there to help us make good, ethical choices.

We are all expected to follow the guidance in these Standards, which are designed to comply with all applicable laws, regulations, and union agreements. If we believe there is any inconsistency between our Standards and those laws, regulations, or agreements we contact our General Counsel for clarification right away.



## Special Responsibilities of Leaders and Supervisors

Our leaders and supervisors play a special role in promoting the unique culture of US LBM. They are responsible for creating a work environment built on trust and aligned with our culture. Leaders and supervisors help our people thrive by:

- » Attracting and retaining associates who are a good fit with our culture
- » Modeling ethical behavior that is consistent with these Standards and our culture
- » Informing associates about the Standards and our shared philosophies
- » Empowering associates to make good, ethical decisions that reflect our shared philosophies
- » Asking for and listening to associates' ideas and concerns
- » Promptly acting to investigate and/or resolve any suspected or actual illegal, unethical, or inappropriate event reported by an associate
- » Ensuring associates are working in an environment that is safe and respectful
- » Actively sharing and adopting best practices across the organization

## Making Ethical Decisions

All of us are faced with decisions every day. Sometimes it's easy to make a decision, but other times, the answers are not as clear. The decisions we make may:

- » Prevent or cause injury or damage
- » Improve or harm the reputation of the US LBM family of companies
- » Strengthen or weaken our organization and our culture

### 1. IS IT LEGAL?

*Ask yourself whether the action is allowed by law.*

### 2. IS IT THE RIGHT THING TO DO?

*Ask yourself whether the action is in keeping with our values and the Standards.*

### 3. HOW SHOULD WE DO IT?

*Check these Standards and the policies and procedures that apply to you to determine how to proceed in a way that upholds our values and responsibilities.*

If your answer to any of these questions is “No” or “I don’t know,” you should stop and seek guidance. Remember that our leaders and the resources on page 7 are always here to help us in tough situations. For help at any time, contact the Ethics Reporting Line at 844-605-7396 or <https://secure.ethicspoint.com/domain/media/en/gui/89832/index.html>



# Speaking Up and Seeking Help

All associates are empowered to speak up whenever there is a question, concern, or idea for improvement. All associates also must speak up to promptly report concerns that relate to actual or suspected wrongdoing or dangers to health and safety at work. Leaders and supervisors are there to provide guidance, and associates should reach out to them whenever help is needed. If you are not comfortable bringing up a question or concern with your leader or supervisor, you should contact one of the resources listed on the right.

## Open Door Policy

US LBM encourages open communication, feedback, discussion, and resolution of any work-related question, concern, or complaint. Any associate may approach their supervisor or another manager to discuss an issue. Our *Open Door Policy*, which can be found in our Associate Handbook, provides helpful information on the steps to follow.



## Resources

Contact one of the following resources if you have a question or concern about how to follow the Standards or about suspected or actual illegal, unethical, or inappropriate conduct:

- » Your manager or supervisor or, if you are a corporate office associate, any member of the executive leadership team
- » Your Human Resources manager
- » Your business unit President and General Manager
- » Our Vice President of Human Resources
- » Our General Counsel
- » The Ethics Reporting Line at 844-605-7396 or <https://secure.ethicspoint.com/domain/media/en/gui/89832/index.html>.

Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.

**Q.** *My supervisor has been dealing with a family illness and is showing signs of being tired and distracted. I like my supervisor, but I noticed that our new hires are not getting some of the training they need. Should I raise the issue? I'm afraid that if I speak up, I'll only be making my supervisor's life more stressful.*

**A.** *We should all speak up whenever we have a question or concern. By speaking up, you can make sure the new hires get the training they need to stay safe and become integrated into the US LBM culture. You will also be helping your supervisor, who may not realize that there is a problem or who may need extra help until the family illness situation is resolved. If you do not wish to raise the issue directly with your supervisor, contact one of the resources listed above.*

## Anonymity and Confidentiality

It is helpful, but not necessary, to give your name when you ask a question or report a possible violation. The Ethics Reporting Line is a safe and confidential way to ask questions and report concerns. The Ethics Reporting Line is managed by a third-party reporting company, Red Flag Reporting, and all calls are handled anonymously, if you prefer. You can contact the Ethics Reporting Line by phone at 844-605-7396 or <https://secure.ethicspoint.com/domain/media/en/gui/89832/index.html>, 24 hours a day, seven days a week. A Human Resources representative will receive the message.

If you wish, you may provide a callback number. The Ethics Reporting Line is not an emergency service. In case of emergency, contact 911 or your local law enforcement authorities.

US LBM will make every effort to respect the confidentiality of associates who raise concerns through the Ethics Reporting Line or the other channels listed on page 7. In general, the identity of an associate who makes a report will be disclosed only to those persons involved in performing or responding to the investigation, unless disclosure is otherwise required by law.

## Zero Tolerance for Retaliation

You are protected. It takes courage to speak up, and we appreciate those who raise issues and report concerns in good faith. We do not tolerate retaliation against any associate who makes a good-faith report of a possible violation of US LBM policies, these Standards, or the law or who participates in any investigation of a suspected violation. Anyone who retaliates against an associate who reports a concern or participates in an investigation will be subject to disciplinary action up to and including termination.

### Q. What is a “good-faith” report?

**A.** *When you speak up because you truly believe a violation may have taken place, you are making a good-faith report. You do not need to have absolute proof of a violation to make a report. However, an associate who makes a report primarily with malice or intent to damage another associate or US LBM is subject to discipline, up to and including termination or other legal means to protect US LBM’s reputation.*



## Investigations, Disciplinary Action, and Waivers

We uphold US LBM’s values and culture by investigating all reports of possible violations of these Standards. Most investigations are conducted internally. In the event of an investigation, we may be asked to provide information. We are committed to responding promptly and truthfully to any requests for assistance. Anyone who violates the Standards will be subject to disciplinary action up to and including termination.

On rare occasions, we may find that following a provision of the Standards is not in the best interests of US LBM. In these cases, we may seek a waiver of the Standards from the General Counsel. Waivers of these Standards for executive officers or directors of US LBM may be made only by the Board or a Board committee since there may be requirements for disclosure or approval that apply.



# Our Workplaces

**“I truly believe we are the best company in the space, and that is entirely because of our associates. Given their effort, loyalty, and passion for what we do, we owe it to them to give them the best environment and safest working conditions possible.”**

*—L.T. Gibson*



# Keeping Workplaces Safe, Secure, and Healthy

*Staying safe and secure, and protecting others, is simply the right thing to do. When we know our work environment is safe, secure, and healthy, we can focus on the tasks at hand and do our best work together.*

**SAFETY.** Our Safety Program was established to promote the safety and health of our associates, maintain a safe work environment, and comply with applicable laws and regulations, including OSHA and DOT standards. The program emphasizes sharing best practices, training, safety awareness, and eliminating hazards wherever possible.

We follow the policies, procedures, and guidance that make up our Safety Program, and those that apply to our jobs, to protect ourselves and our coworkers. We always remember these basic safety rules:

- » Keep work areas and equipment clean and orderly, and make sure aisles, exits, and fire extinguishers are not blocked.
- » Do not use or “temporarily repair” equipment that is not in proper working order. Instead, report the damage so it can be repaired properly.
- » Follow posted safety signs, capacity limits, handling procedures, and traffic regulations. Do not bypass safety precautions even if GPS mapping or other technology indicates otherwise.
- » Wear or use the required safety equipment when working or operating machinery, and follow all safety guidelines in the Safety Program, together with any local plans or programs – in particular our **Drug and Alcohol Policy** – and procedures for the environment and task.
- » Do not use equipment or tools for a purpose other than that for which they were designed.
- » Do not engage in workplace violence – including violent, threatening, intimidating, or bullying behavior toward anyone – it will not be tolerated.
- » Immediately report all accidents, injuries, observed hazards, or safety rule violations to your local safety coordinator or the US LBM National Safety Partner.
- » Immediately report all serious accidents to the US LBM National Safety Partner, your supervisor, and your local safety coordinator.

## Special Reminder for Mobile Phone Users

If you are authorized to use a mobile phone while driving for the company, the mobile phone must be hands-free. Otherwise, find a safe place to stop before using a mobile phone. Do not use a mobile phone, including hands-free, when using tools, operating machinery, or moving items.



**SECURITY.** We protect the security of our work areas by:

- » Preventing unauthorized access by those who could cause harm or loss to our equipment, assets, associates, or visitors
- » Immediately reporting all acts of violence, threatening behavior, or breaches of physical security to a supervisor
- » Never tolerating violence or weapons in the workplace
- » Talking through disagreements calmly before they escalate
- » Contacting local emergency services for assistance if we feel danger is imminent

**HEALTH.** We limit the use of all tobacco and smoking products, including chewing tobacco and electronic cigarettes, to outside areas only. The US LBM family of companies believes that drugs and alcohol in the workplace could harm the health and safety of our associates, so we follow our ***Drug and Alcohol Policy***, which provides information about how we maintain a healthy workplace and help support our coworkers in doing the same.

We strive for continuous improvement in the safety, security, and health of our workplaces. If we know of a way to perform a job more safely or to improve our security, we speak up and tell a supervisor. If we aren't sure how to do a job or task safely or if we believe any associate is working under the influence of drugs or alcohol, we tell a supervisor immediately or ask a qualified person for help.



### Stop Work Authority

You are empowered to stop work when unsafe conditions exist. If you see that people, property, or the environment are in imminent danger, stop work immediately; then notify a supervisor. US LBM will protect you from retaliation if you act in good faith.



### Executive and Regional Safety Committees — “Keep US Safe”

Founded in 2010, the Executive and Regional Safety Committees lead the health and safety reports of the US LBM family of companies. They review the policies, procedures, and training that make up our Safety Program to cultivate a culture of “Keep US Safe” across all of our business units. The committees provide updates on safety requirements and the continuous sharing of safety best practices among the business units.

The Executive and Regional Safety Committees are the engine behind continuous improvement in health and safety at the US LBM family of companies. Every business unit is represented within the committees — we want all voices to be heard.

The Executive and Regional Safety Committees are powered by people like you. To get involved in its programs, contact your local safety coordinator or the US LBM National Safety Partner.

# Fostering Respectful and Inclusive Workplaces

*Teamwork is important for US LBM's business units to succeed. Respect, diversity, and inclusion make us stronger by helping ensure that we get the best people on our team. When all our voices are heard, we innovate more rapidly and come up with better solutions to problems.*

We create a respectful, inclusive work environment by:

- » Listening to others with courtesy and respect
- » Being honest and maintaining positive attitudes
- » Avoiding saying or doing anything that others may find hostile, offensive, or intimidating
- » Speaking up when we witness harassing or disrespectful conduct by associates or visitors

## Effective and Respectful Communication

We need to communicate clearly and respectfully. It is not in your best interest or the best interest of US LBM to post malicious, abusive, unlawful, hateful, misleading, or false statements or content, whether in writing, email, or social media. Even if you are responding to someone else with whom you disagree or you assume that the communication will remain private between you and the intended recipient, take the time to reflect – every time – before you hit Send. Assume that everything you write is available to your coworkers and the public. Before you hit Send, review what you have written to ensure it is accurate and professional.

We respect employees' rights to disagree or to communicate concerns in an appropriate and legal manner. Remember that email and other written forms of communication are poor substitutes for face-to-face communication, particularly on contentious or difficult subjects. Whenever possible, choose the benefits of direct social interaction over the convenience of email.

## Protecting Human Rights

The US LBM family of companies believes all people are entitled to be treated with dignity, equality, and respect. We respect and protect the human rights of our associates, visitors, and communities by:

- Providing fair and safe work practices, conditions, and compensation to all US LBM associates
- Never using child, forced, or prison labor
- Staying alert to potential human rights violations and immediately reporting them to the proper authorities and to the General Counsel

Discrimination in any form is not acceptable at the US LBM family of companies, including discrimination based on any characteristic protected by law.

We promote equal opportunity and diversity by:

- » Basing decisions about hiring, training, promotion, and other conditions of employment solely on merit
- » Accommodating individuals with legally recognized disabilities
- » Never tolerating discrimination of any kind

**Q.** One of the new hires on my team is a young woman. Two of the other associates make sexual comments about her when she's out of earshot. I feel it's disrespectful, even if she doesn't hear them. Should I say something?

**A.** Yes. This behavior is not in keeping with our values and must stop. Start by talking to the associates who are making the comments. Help them realize their comments are disrespectful to your coworker, and ask them to stop. If they do not stop or if you are uncomfortable raising it with them directly, tell a supervisor about the situation. Disrespectful behavior harms our people and our business, and we cannot allow it to continue.

**For more information, see our Equal Employment Opportunity, Anti-Harassment, and Non-Discrimination Policies located in our Associate Handbook.**

# Using Social Media Responsibly

*We are careful in our use of social media and do not disclose confidential information online.*

We all have the right to post our ideas and opinions on social media. However, some posts – such as those containing the US LBM family of companies' confidential or proprietary information – are inappropriate and could harm our associates or our business units. We use social media responsibly by:

- » Not allowing it to interfere with our work
- » Never disclosing the US LBM family of companies' confidential or proprietary information
- » Never representing our personal views as those of the US LBM family of companies

## Our Right to Communicate

All associates have the right to discuss their working conditions, wages, and hours with other associates online. Nothing in these Standards or any of our policies restricts associates from exercising this right.

***For more information, see the “Digital Citizenship” section of our Associate Handbook.***



# Our Business

**“What US LBM is all about is creating value for everyone in our channel: our vendors, our companies, and our customers. We understand the value of these relationships and will treat them with care and respect.”**

*—L.T. Gibson*



# Dealing Fairly and Honestly

*We win business based on our service and performance.*

## Serving Our Customers and Working With Our Vendors

We compete and win on the basis of excellent service, reliability, and a reputation for integrity. We deal fairly and honestly with our customers and vendors by:

- » Making only true statements about our products, services, and capabilities
- » Communicating honestly with our business partners to address challenges
- » Never misrepresenting a competitor's products or services
- » Advertising in a way that complies with all laws and regulations
- » Following all laws and special requirements related to government contracting and international business and trade
- » Never offering or accepting anything that could appear to be a bribe, a kickback, or otherwise inappropriate entertainment

## Competing Fairly

We welcome competition as an opportunity to win business by showing what makes us the best in our industry. We comply with the letter and spirit of all antitrust laws, and do not:

- » Make agreements with competitors about prices or terms
- » Communicate with competitors about bids
- » Share information with competitors about our cost structure
- » Talk about contract terms, costs, suppliers, bids, marketing initiatives, or strategic plans with competitors
- » Make agreements with competitors about employee compensation, hiring, or recruitment
- » Take illegal or unethical steps to obtain our competitors' confidential data

## Preventing Insider Trading

While working for the US LBM family of companies, we may have access to information that has not been shared with the public. In some cases, the information is considered "material, non-public information." This type of information could be used by an investor to make decisions about buying or selling shares of stock. We have a duty to prevent insider trading by:

- » Never disclosing inside information to anyone outside the company
- » Never buying, selling, or dealing with shares in any publicly traded company when in possession of inside information
- » Complying with all insider trading laws, rules, and regulations

**For more information, see the "Doing the Right Thing" section of our Associate Handbook.**



## Taking Precautions

Sometimes there may appear to be an agreement, or the suggestion of an agreement, even when one doesn't exist. So we don't take chances. The best way to avoid antitrust issues is to be very careful in all communications with competitors, whether oral, written, or electronic. If we do have to communicate with a competitor, we stick to whatever business issue prompted the discussion.

Antitrust and competition laws are serious business. Violations can be criminal; people can go to jail, and companies can pay huge fines. If a competitor's confidential information is disclosed to you or you become aware of an activity that violates or even might violate competition laws, notify our General Counsel or report it through the Ethics Reporting Line immediately.

**Q.** A new employee just joined our team from a competitor and provided me with a list of local contacts who were purchasing from her former employer. She was trying to be helpful, but I don't think she should have shared this information. What should I do?

**A.** You are right to be concerned. Even if the new employee had good intentions, this information may belong to our competitor. Let the new employee know that she should not share the information further, and immediately contact our General Counsel for assistance.

# Avoiding Conflicts of Interest

*A conflict of interest occurs when our personal interests interfere or appear to interfere with the company's interests. We avoid conflicts of interest so we can make smart, unbiased decisions that benefit our business and our customers.*

We protect US LBM's best interests by:

- » Never putting our personal interests ahead of the interests of the US LBM family of companies
- » Selecting business partners based on merit and not on our personal preferences
- » Avoiding activities or relationships that improperly influence our judgment, or even could appear to do so, when making business decisions
- » Not exchanging gifts or other favors that might influence our decisions about business partners
- » Promptly disclosing in full any actual, apparent, or potential conflict of interest, or the appearance of one, even if we believe it is minor.

## Making the Hard Calls

Sometimes the right answer is clear: a gift of a mug or a cap with a company logo is not considered inappropriate, but an envelope of cash certainly is. On the other hand, it may not be quite so easy to tell whether it is proper to accept a vendor's offer to host your team at dinner or when you are impressed by a supplier's financial performance and are thinking of buying its stock.

When you confront a difficult issue, you should not attempt to manage the situation yourself. Your obligation is to elevate it so that a US LBM compliance or legal professional can help you find the right answer. If you are unsure whether or not a conflict of interest exists, seek help from your business unit President and General Manager. If you are a business unit President and General Manager or a corporate office associate, contact our General Counsel immediately if you become aware of any situation that creates or appears to create a conflict of interest.

Many actual, apparent, or potential conflicts of interest can be resolved or avoided if they are properly disclosed and approved in advance. Depending on the circumstances, US LBM may require that the conduct in question be stopped or that actions already taken be reversed.



Although we cannot list every possible conflict, below are some common examples and how to disclose them. We do not engage in any conduct that creates an actual or apparent conflict of interest, including those situations described below, unless we first disclose all the relevant facts to the appropriate contact and US LBM approves us in writing to proceed. If we are involved in a conflict situation not described below, we discuss the situation with our General Counsel.

## Family Members Working in the Industry

We may find ourselves in a situation where a significant other or family member is also an associate at US LBM, or works for a competitor, vendor, or customer. Such situations are not prohibited, but they call for extra sensitivity to security, confidentiality, and potential conflicts of interest. We address these situations by:

- » Disclosing the specifics of the situation to our General Counsel, including the relationship between US LBM and the other company, the nature of our responsibilities and those of the other person, and the access that each person has to confidential business information
- » Following the guidance provided by our General Counsel

Our General Counsel will assess the nature and extent of any security, confidentiality, or conflict of interest concern and determine how it can be resolved. In some instances, any risk to US LBM's interests is sufficiently remote that the General Counsel may only remind us to guard against inadvertently disclosing confidential company information and not to be involved in decisions that involve the other company on behalf of US LBM.

## Gifts and Entertainment

Business gifts and courtesies are frequently used to build corporate goodwill between business partners. Often, these courtesies are appropriate. However, we never use gifts and entertainment to improperly influence the business decisions of individuals or organizations that do business or are likely to do business with US LBM.

We keep the following principles in mind to avoid a conflict of interest:

- » Both the giving and receiving of gifts and entertainment must be moderately scaled and infrequent.
- » Gifts and entertainment must be clearly intended to facilitate goodwill in our business relationships and not to influence the award of a particular piece of business.
- » We may give and accept common courtesies (such as occasional meals and entertainment at sports, musical, and theatrical events) but only to the extent usually associated with accepted business practices.
- » We may not give or receive cash or cash equivalents.
- » No gift, favor, or form of entertainment given or received should expose US LBM or its associates to physical harm or undue reputation risk if made public.
- » We must receive written approval from our business unit President and General Manager, or from our General Counsel if we are a corporate office associate, before accepting a gift valued at more than \$500.
- » We do not offer or give a gift if we believe it is not allowed under the policies of the recipient's organization.
- » All gifts and entertainment given must be accounted for properly in US LBM's books and records.
- » We never give gifts, meals, or entertainment to government officials, no matter how small or well-intentioned.

**For more information, see the “Doing the Right Thing” section of our Associate Handbook.**



## Financial Interests and Personal Benefits

We do not own or possess an interest in any competitor, customer, or vendor of US LBM, other than mutual funds or other investments where we do not actively participate in the business between US LBM and the other entity, unless we have prior written approval from our General Counsel. Prior approval is not required for less than 1% of a publicly traded stock.

It is a conflict of interest for an employee, officer, director, or member of the employee's family to receive an improper personal benefit as a result of his or her position at US LBM. We do not accept any benefits from US LBM that have not been properly authorized and approved by our General Counsel, including loans or guarantees of our personal obligations. US LBM cannot make any personal loan to, nor guarantee any personal obligation of, any director or executive officer. We do not participate in a joint venture, partnership, or other business arrangement with US LBM without prior written approval from the Board.

**For more information, see the “Conflicts of Interest” section of our Associate Handbook.**

## Corporate Opportunities

We do not take personal advantage of opportunities that we discover in the course of working for US LBM. Instead, we bring these opportunities to US LBM's attention for the benefit of the entire company. We do not compete with the company or use the company's assets, information, or position for personal gain.

## Outside Activities

We do not participate in outside activities that could prevent us from properly fulfilling our obligations to US LBM, including working with or for a US LBM competitor. We do not work with or for a customer or supplier without written consent from our General Counsel. We do not use company resources or time for outside activities.

**Q. I have an outside business and I am not sure whether or not it conflicts with US LBM's interests. What should I do?**

**A. First, inform your business unit President and General Manager and discuss the outside business. Your business unit President and General Manager will engage the appropriate resources to determine whether or not a conflict of interest exists and if so, how it can be addressed. If you are a business unit President and General Manager or a corporate office associate, inform our General Counsel. There may not be a problem, or there may be a simple solution that allows you to pursue your interests while also protecting US LBM's interests.**

## Keeping Accurate Records

*The US LBM family of companies is committed to keeping accurate records about our business and financial performance.*

We keep complete and accurate records to help us run our business and provide truthful information about its operations. When obligated to do so, we must disclose these records in a timely manner. We maintain the integrity of our records by:

- » Reporting time worked accurately and promptly
- » Carefully following US LBM's document retention requirements and all other record-keeping procedures and guidelines
- » Never using misstatement, exaggeration, or guesswork in our records
- » Creating and maintaining books, invoices, expense reports, and receipts that honestly reflect financial transactions
- » Recording all assets, liabilities, revenues, expenses, and business transactions completely, accurately, and in a timely manner
- » Following standard accounting principles, internal controls, and all relevant laws and regulations when keeping records
- » Responding promptly and accurately to requests for records from internal and external auditors
- » Immediately reporting to the Chief Financial Officer any concern that a record is inaccurate, false, or misleading

**For more information, see the "Doing the Right Thing" section of our Associate Handbook.**



## Safeguarding Our Reputation and Other Assets

*We keep our assets safe from theft, loss, fraud, waste, and abuse.*

Our assets – including our reputation – are the result of hard work by the associates of the US LBM family of companies. We use those assets wisely and safeguard them by:

- » Always handling company assets honestly and responsibly and following US LBM policy
- » Reporting abuse or misuse of company assets promptly to one of the resources on page 7
- » Staying productive by limiting our personal use of company-owned property
- » Following all security procedures for our locations
- » Taking action to prevent harm to our associates, visitors, assets, and equipment
- » Never allowing unauthorized persons – including friends and family – to use company assets

### **Q.** What is an asset?

**A.** *An asset is anything of value that the US LBM family of companies owns. Assets come in different forms:*

- *Physical assets – office supplies, inventory, warehouse equipment, vehicles, and mobile phones*
- *Financial assets – money, stocks, bonds, loans, expense account funds, and Associate Purchase Program discounts*
- *Intangible assets – our reputation, ideas, and intellectual property*
- *Information assets – data contained in our files and on our servers*

# Using Information and Technology Responsibly

*We use technology responsibly and protect the confidential information that is entrusted to us.*

Every day, we handle valuable business information and use technology to process and store it. We also collect and handle personal information to run our business; comply with privacy, data protection, and other laws; and provide benefits to our associates. We use our information and communications technology responsibly by:

- » Making sure all confidential, personal, and proprietary information – including data and intellectual property belonging to the US LBM family of companies, its associates, customers, vendors, and others – is kept safe, secure, and out of public view
- » Complying with HIPAA requirements for protection of employee health information
- » Collecting and using personal information only to meet legal requirements or US LBM business needs
- » Sharing personal and business information only with people who have a business need to know
- » Allowing only authorized users to access US LBM's devices and network services
- » Protecting user IDs and passwords, changing them often, and never sharing them with others
- » Keeping computer equipment, including laptops and smartphones, safe and secure at all times whether we are on or off company premises
- » Staying productive and safe by limiting our personal use of mobile phones and other wireless devices during working hours
- » Understanding that US LBM reserves the right to monitor use of its technology systems and that by using US LBM's systems, we consent to that monitoring
- » Following all patent, copyright, licensing, and other intellectual property laws and requirements
- » Never using US LBM systems to harass anyone

**For more information, see the “Digital Citizenship” section of our Associate Handbook.**



**Q.** I completed a US LBM training program recently, and it was very useful. Outside of work, I participate in a community group and would like to share the training program's materials with the group. Since it's for a good cause, may I make copies of the materials and give them to the group?

**A.** *Not without authorization. US LBM associates invest significant time and resources in creating our training programs, and they are our intellectual property. If you would like to share the materials, reach out to our General Counsel. US LBM may be able to share the information with your group but only in a manner that makes it clear that the content still belongs to us.*

**Q.** What is personal information?

**A.** *Personal information can include any information that could be used to identify a specific person, such as:*

- Name
- Home and email address
- Date of birth
- Health records
- Login name or password
- Payment card information
- Government-issued identification (e.g., Social Security number or driver's license number)

# Our Communities

**“The value we create for the communities where we live and work is just as important to us as the value we create for our vendors and customers. We’re very proud to stand with and support local charities and organizations that seek to improve the quality of life in our communities.”**

*—L.T. Gibson*



# Protecting the Environment

*We recognize that our activities as a supplier of building materials may affect the environment, and we do our best to minimize that effect to protect the communities in which we operate.*

We protect the environment by:

- » Seeking continuous improvement in the environmental safety of our business practices
- » Following all applicable environmental laws and company policies
- » Empowering associates to speak up about violations or environmental hazards
- » Following company procedures for waste management
- » Taking individual steps to conserve energy, such as turning lights off and keeping engines from idling



# Representing US LBM

*We communicate our message clearly, consistently, and correctly to the public and speak on behalf of the US LBM family of companies only if we are authorized to do so.*

Certain US LBM associates are trained and authorized to speak to the public on behalf of the US LBM family of companies. This helps us prevent misinformation from being improperly released. Unless we are authorized to represent the US LBM family of companies, we handle all outside inquiries by:

- » Explaining politely that we are not authorized to answer questions but will put them in touch with someone who can
- » Referring all outside inquiries to our Communications Manager at [USLBM.Communications@uslbm.com](mailto:USLBM.Communications@uslbm.com)
- » Never sharing confidential or proprietary information belonging to the US LBM family of companies with outside persons, including our family members or friends

## Social Media Guidance for Authorized US LBM Representatives

If we are authorized to represent the US LBM family of companies on social media, we make sure to:

- Respond only in ways that are consistent with our training as US LBM representatives
- Avoid responding in ways that can be taken out of context, distorted, or misunderstood



# Contributing to Our Communities and Causes

*We make positive contributions to society as individuals and as a company, and by contributing to our communities and causes, we show support for the people who have helped our business units to thrive.*

As individuals, we make positive contributions to society by:

- » Volunteering and participating in charitable activities
- » Participating in civic and other events in our communities
- » Never pressuring other associates to participate in or donate to any charitable cause or political activity
- » Making it clear when we engage in political activity that we are not speaking on behalf of the US LBM family of companies

As a family of companies, we make positive contributions to society by:

- » Giving to The US LBM Foundation
- » Organizing company-wide charitable events
- » Observing the rules governing corporate political campaign contributions
- » Complying with local campaign finance and election laws

**Q.** I've started an online fundraising campaign to help a local charity. Can I invite my colleagues to contribute to the cause?

**A.** While there is nothing wrong with supporting a personal cause, you must be careful about inviting other associates to contribute to the effort. The US LBM family of companies has procedures in place to review and approve our fundraising activities in the workplace. Speak to your supervisor before asking other associates to get involved.

## The US LBM Foundation

The US LBM Foundation exists to help people in need. It supports charities and causes that matter to our associates and that make a difference in our communities. The Foundation helps organizations including Team Joseph, Habitat for Humanity, and the National Multiple Sclerosis Society, among others. To contribute to The US LBM Foundation directly through payroll, contact your local payroll partner.





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