
Workplace Violence Policy

Purpose

TopBuild Corporation (the “Company”) is committed to maintaining a safe, healthful, and efficient work environment where employees, customers, suppliers, and guests are free from the threat of workplace violence.

Scope

Any individual who conducts business for the Company, is applying for a position or is conducting business on Company property is covered by and must adhere to our Workplace Violence Policy. Our policy includes, but is not limited to, all levels of management, supervisors, full-time employees, part-time employees, off-site employees, temporary staff, volunteers, interns, guests, and applicants (collectively “Covered Persons”). Where a federal, state or local law or regulation conflicts with any provision in this policy, the federal, state, or local law or regulation supersedes this policy.

Applicability

Our Workplace Violence Policy applies to all employees of TopBuild and its affiliates and other Covered Persons and is intended to apply whenever anyone is representing or conducting business for the Company. Therefore, this policy applies during all working hours, whenever conducting business or representing the Company, while on Company property, while engaging in Company business, and while operating any Company machinery or vehicles.

Prohibited Behavior

In keeping with this policy, TopBuild prohibits any Covered Person from engaging in any act, either on Company premises, or during the performance of work–related duties, that:

- Threatens the safety of an employee, supplier and/or customer;
- Adversely affects the health, life, or well–being of an employee, supplier and/or customer; and
- Results in damage to Company, employee, or customer property.

Such acts include, but are not limited to:

- Threatening, intimidating, coercing, harassing, bullying or assaulting any Covered Person or third party.
- Gestures of threats or violence
- Sexually harassing any Covered Person or third party;

- Carrying weapons, concealed or open, on Company property or concealing a weapon on Company property;
- Allowing unauthorized persons access to the building without management permission.
- Using, duplicating, or possessing keys to the building or offices within the building without authorization.
- Stealing, or attempting to steal, property of TopBuild or any Covered Person or third party; and
- Damaging, or attempting to damage, property of TopBuild or any Covered Person or third party.

Reporting and Investigation Procedures

Any Covered Person (including a supervisor or a manager) who has been threatened, is a victim of a violent act, witnesses any threats or violent acts, or learns of any threats or violent acts, shall report such activity to his or her supervisor and/or Human Resources immediately. Any Covered Person may also report the incident via TopBuild's Ethics and Compliance Hotline (1-855-255-1026 or www.topbuild.ethicspoint.com).

Each report will be promptly evaluated and investigated by an appropriate cross-functional team who will determine what follow-up actions are necessary. Management will have the authority to request law enforcement intervention, should it be deemed necessary.

Workplace Violence Policy Monitoring and Responses

A cross-functional team of representatives from human resources, health and safety, legal, and outside consultants (when necessary) will handle investigations into allegations of workplace violence. In evaluating specific incidents of misconduct, alleged violations of this policy or threats to employees or Company assets, the investigation team may consider the following:

- Review of employee criminal history and weapons ownership interviews with co-workers and others; a professional medical or psychological evaluation and referral to the Company's Employee Assistance Program.
- The arrest of, or criminal charges against, an employee, contractor, temporary employee, or other person who is expected to be present at any Company location, involving violence to another person, property damage or weapons;
- The arrest of, or criminal charges against, an employee, contractor, temporary employee, or other person who is expected to be present at any Company location, involving domestic violence or against any other person for alleged domestic violence toward an employee; and
- Any restraining order or personal protection order filed by or against any employee, contractor, temporary employee, or other person who is expected to be present at any Company location, based on acts of violence or threats of violence.

Human Resources Management in conjunction with the Safety Team will routinely monitor the effectiveness of TopBuild's violence prevention strategies. Changes will be made, as necessary, to correct deficiencies and reflect changing workplace conditions.

Confidentiality

Information about an incident or threat reported pursuant to this policy will be disclosed on a need-to-know basis only, so that a fair and thorough investigation can be conducted, and/or appropriate corrective action can be taken. In addition, TopBuild will undertake reasonable measures to promote the safety and privacy of the individuals involved.

Weapons

To reduce the risk of violence, TopBuild also prohibits possession of weapons while on Company property, engaged in Company business, or at Company functions, regardless of whether an individual has a valid permit to carry a weapon. The only exception to this rule is utility knives, batt knives and other company-issued tools. Weapons are not permitted in any container, Company vehicle, vehicle being used for Company business, or personal vehicle on Company property (except to the extent permitted under state law). "Weapon" includes any object the use of which is intended to cause or capable of causing bodily harm, property damage, or intimidation of any degree, including but not limited to handguns, rifles and explosives, or any item that could be adapted to a specific purpose to cause harm or damage.

Discipline

A covered person who engages in conduct prohibited by this policy will be subject to appropriate disciplinary or corrective action, as determined by the findings of the investigation. Discipline may include warnings, reprimand, suspension, or immediate termination per the Company Progressive Discipline Policy. Other corrective action may be taken as appropriate. In addition, certain actions may cause the employee to be held legally liable under state and/or federal law.

Making a knowingly false report of workplace violence, refusing to cooperate in good faith with the Company, its consultants, or law enforcement in an investigation, refusing to allow inspection of personal items, including vehicles, and interfering with security policies, procedures or equipment are violations of this policy and are subject to discipline and/or corrective action.

Retaliation

Episodes of workplace violence can only be eliminated if employees are willing and able to report threats, violent acts, and other unsafe conditions. To encourage employees to come forward without the fear of retaliation, TopBuild Corp. is committed to promptly investigating all complaints of retaliation, and imposing appropriate disciplinary action, up to and including termination, or other corrective action.

Training and Awareness

TopBuild Corp. will conduct periodic awareness training for all its employees, including supervisors and managers. These sessions will explain TopBuild's policy on workplace violence,

as well as cover procedures for reporting and investigating threats, violent acts, and unsafe workplace conditions. In addition, employees will be informed of their responsibilities, and of the measures they can take to protect themselves and their co-workers from episodes of workplace violence.

To further promote employee awareness of this policy, TopBuild Corp. will provide each employee access to this policy by way of Company intranet sites and will require employees to certify their receipt and agreement to abide by the policy by way of training roster, electronic acknowledgement, or signature. TopBuild will also maintain a library of materials, readily accessible to employees that address the issues of workplace violence, security, and personal safety.

Employee Suggestions

All employees are encouraged to take an active role in creating a safe work environment. Any suggestions for improving this policy or the security of the workplace should be directed to Human Resources.

Document Control

Change History

Version	Approval Date	Description of Change
1.0	29-Feb-2016	Initial release of TopBuild document.
1.1	02-Nov-2020	Addition of bullying to prohibited behaviors
1.2	29-Nov-2022	Clarification of procedures and participants