

Human Rights Policy

At TopBuild Corp. (“TopBuild”), we acknowledge and are committed to respecting and upholding the human rights and dignity of all individuals within our operations, supply chain, and communities. This company-wide Human Rights Policy sets forth our values and underscores the philosophy with which we conduct our business. All TopBuild employees, including stakeholders across the organization, are responsible for and involved in the development, training, implementation, and follow-through of this Human Rights Policy. Our commitment to this Human Rights Policy means respecting the rights of people living in the communities around our operations.

TopBuild publishes and adheres to seven core values which are the cornerstone of our culture:

- **Safety** – We put the health and safety of our people first
- **Integrity** – We deliver results with integrity, respect, and accountability
- **Focus** – We are customer-focused, grounded in strong relationships
- **Innovation** – We are continuously improving and encourage idea sharing
- **Unity** – We are united as one team, valuing diversity
- **Community** – We make a difference in the communities we serve
- **Empowerment** – We are empowered to be our best, individually and as a team .

By living these values, we will deliver results that benefit all our stakeholders.

We are committed to respecting human rights and upholding the principles set forth in the United Nations’ Guiding Principles (UNGPs) on Business and Human Rights. “Human Rights” refers to the basic standards of treatment to which all people are entitled, including racial, economic, social, cultural, political, gender (including women’s rights, transgender status, sexual orientation, marital, and family status), and civil dimensions. TopBuild also recognizes employees’ rights to freedom of association and collective bargaining. For TopBuild, following this Human Rights policy means ensuring that we provide our products and services under conditions which demonstrate our respect for our employees, suppliers, and customers.

TopBuild operates with a spirit of continuous improvement and is committed to increasing our capacity to identify and respond to Human Rights concerns. We recognize our responsibility to protect against Human Rights abuses throughout our operations and to foster a culture which supports our values. Our commitment to this belief is supported by following the letter and spirit of the law. We maintain a zero-tolerance policy for human trafficking, child labor, and forced labor. We are also committed to proactively creating policies to promote respect for Human Rights and communicating the way we address Human Rights with our business partners.

We apply our Human Rights Policy to all company operations, as well as to all partners and suppliers. We expect our suppliers and customers to comply with contractual requirements and to respect Human Rights in a manner consistent with this policy within their operations and supply chains. We offer our business partners and suppliers transparency and resources upon request

as to how we as an organization drive Human Rights practices in accordance with the UNGP on Business and Human Rights.

We encourage our employees, suppliers, and other stakeholders to speak up about any Human Rights concerns. We will not tolerate retaliation or reprisal against any workers, suppliers, or others for having enforced, supported, or reported suspected violations of this Human Rights Policy. This policy is also supported by our “Supplier Business Practices Policy” [Suppliers :: TopBuild Corp. \(BLD\)](#).

Any questions or concerns relating to this Human Rights Policy may be directed to any member of TopBuild management. Any concerns relating to this Policy may also be reported by contacting the Employee Hotline at 1-855-255-1026 or accessing the website at www.topbuild.ethicspoint.com. EthicsPoint reports may be made anonymously.

Document Control

Change History

| Version | Approval Date | Description of Change |
|---------|---------------|---------------------------------------|
| 1.0 | 10-Sept-2020 | Policy creation |
| 1.1 | 20-Oct-2021 | Update for content accuracy |
| 1.2 | 07-Feb-2022 | Added labor rights sentence to page 1 |
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