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## Drug-Free Workplace Policy

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### Purpose

TopBuild Corp. (together with its subsidiaries and affiliated companies including, but not limited to, Builder Services Group, Inc., TopBuild Home Services, Inc., American National Insulation, Inc., and Service Partners, LLC) (collectively the “Company”) is committed to protecting the safety, health, and well-being of all employees and other individuals in our workplace. We recognize that alcohol abuse and drug use pose a significant threat to achievement of our goals and the safety of our workplace. Accordingly, we have established a drug-free workplace program that balances our respect for individuals with the need to maintain an alcohol and drug-free work environment.

### Policy

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#### Applicability

Our Drug-Free Workplace Policy applies to all employees, volunteers, interns, and applicants to TopBuild and its affiliates (collectively “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, and while operating any Company machinery or vehicles.

#### Prohibited Behavior

As a condition of employment with the Company, all Covered Persons agree to comply with this Policy and to consent to drug and/or alcohol testing. Covered Persons who engage in the prohibited conduct or otherwise violate the terms of this Policy are subject to discipline up to and including immediate termination of employment. Applicants for employment who violate the Drug-Free Workplace Policy will receive no further consideration, and any conditional offer of employment will be withdrawn. Applicants for employment are not eligible for the last chance program and are not eligible to re-apply for employment for a period of ninety (90) days.

1. Covered Persons are prohibited from reporting to work, being on Company premises or property (including parking lots) or operating/occupying Company vehicles or equipment while under the influence of drugs, alcohol, or other unauthorized substances.
2. Covered Persons are prohibited from applying for employment, reporting to work, being on Company premises or property (including parking lots) or operating/occupying Company vehicles or equipment with alcohol in his/her system sufficient to yield a positive alcohol test result and/or with drugs (and/or drug metabolites) in his/her system sufficient to yield a positive drug test result.
3. Covered Persons are prohibited from using, possessing, purchasing, selling, manufacturing, transferring, dispensing, trafficking, or distributing (or attempting to use, possess, purchase, transfer, dispense, traffic, or distribute) drugs, alcohol, or other unauthorized substances, including related paraphernalia, in any amount, in any manner or at any time, on Company premises or property (including parking lots) or in Company vehicles or equipment.

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4. Covered Persons are prohibited from using, abusing, possessing, purchasing, transferring, dispensing, trafficking, or distributing (or attempting to use, possess, purchase, transfer, dispense, traffic, or distribute) over-the-counter, or prescription drugs or medications on Company premises or property (including parking lots), as set forth below. Specifically, Covered Persons are prohibited from using, possessing, purchasing, transferring, dispensing, trafficking, or distributing (or attempting to use, possess, purchase, transfer, dispense, traffic or distribute):
    - a. prescription drugs that are not prescribed to the Covered Person and/or prescribed on an invalid or non-current prescription;
    - b. prescription drugs that are prescribed to the Covered Person at non-therapeutic levels or used in a manner or quantity other than as set forth in the directions; or
    - c. over-the-counter drugs in a manner or quantity other than set forth in the directions; or
    - d. over-the-counter or prescription drugs in an unsafe manner.
  5. Covered Persons are prohibited from refusing to provide an adequate drug or alcohol test sample/specimen without a valid medical basis, refusing to cooperate during collection or testing, or failing to report (or report promptly) to the collection site without a legitimate reason.
  6. Covered Persons are prohibited from providing an altered, adulterated, diluted or substituted drug or alcohol test sample or specimen. Covered Persons are prohibited from using a device or substance to interfere or attempt to interfere with a drug or alcohol test.
  7. Excepting the need for first-aid or emergency medical care (or where otherwise provided by law), Covered Persons asked to submit to a post-accident or reasonable suspicion alcohol or drug test are prohibited from using alcohol or drugs (including over-the-counter or prescription drugs) for eight hours following the accident or determination of reasonable suspicion, or until the Covered Person undergoes an alcohol or drug test, whichever occurs first.
  8. Exception for Alcohol Use at Company-Sponsored Events: Alcohol may be served at certain work-related events (as authorized by the CEO, President/COO) that you are asked to attend in the course of your job. At those events, alcohol consumption by employees in moderation does not violate the terms of this Policy so long as the employee exercises good judgment (including not becoming intoxicated) and so long as the employee acts in a lawful, safe, professional and responsible manner at all times.

Note that it is the Company's intention to comply with all applicable federal, state, and local laws. Where state and federal law differ, however, the Company will comply with federal law, except where otherwise provided. For example, some state laws permit the use and possession of marijuana for medical and/or non-medical purposes, but federal law does not. In the absence of federal law to the contrary, the Company considers marijuana use to be prohibited for purposes of this Policy in all states – even those states that allow for medical and/or non- medical use.