

WHITE CAP® Equal Employment Opportunity Policy Statement

It is the policy of White Cap not to discriminate against any employee or applicant for employment on the basis of race, ethnicity, color, sex (including childbirth, breast feeding, and related medical condition), pregnancy, sexual orientation, gender identity or expression, age, religious creed, national origin, citizenship status, ancestry, physical disability, mental disability, military and veteran status, marital status, protected medical condition, genetic information, traits historically associates with race, including but not limited to, hair texture and protective hairstyles, gender identity and expression and sexual and other reproductive decisions, or any other bases prohibited under applicable state, federal, or local laws. It is also the policy of White Cap to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, at all levels of employment. Furthermore, the company will provide qualified applicants and employees who request an accommodation due to a disability with reasonable accommodations, as required by law.

White Cap strictly prohibits harassment concerning any protected characteristic, including but not limited to employees and applicants because they are individuals with disabilities or protected veterans. White Cap also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, Betsy Malkin has been selected as Chief Human Resources Officer for White Cap. Betsy and her team are responsible for establishing and maintaining an internal audit and reporting system to allow for effective measurement of White Cap's programs.

In furtherance of White Cap's policy regarding affirmative action and equal employment opportunity, White Cap has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that White Cap is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request between 9:00am to 4:00pm at the Human Resources department. Any questions should be directed to your Manager, HR Partner, or LELawCompliance@whitecap.com.

Any associate or applicant who believes they have been subject to discrimination or retaliation should contact their Immediate Manager, HR Partner, LELawCompliance@whitecap.com, or White Cap's AlertLine at 1.844.330.7090 or whitecap.ethicspoint.com.



John Stegeman
Chief Executive Officer



Betsy Malkin
Chief Human Resources Officer