

BMC STOCK HOLDINGS, INC.

CONFLICT MINERALS POLICY

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Conflict Minerals Rule”). The Conflict Minerals Rule requires public companies to report to the SEC annually regarding whether products they manufacture or contract to manufacture contain “Conflict Minerals” (tin, tungsten, tantalum and gold) necessary to the functionality or production of those products that originated in the Democratic Republic of the Congo (the “DRC”) and its adjoining countries of Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (collectively, the “Covered Countries”). Revenues from the sale of Conflict Minerals may be directly or indirectly financing or benefiting armed groups in the Covered Countries engaged in serious human rights abuses.

BMC Stock Holdings, Inc. (“BMC”) is committed to the Conflict Minerals Rule’s goal of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals from that region. This includes undertaking due diligence efforts to assess whether our products contain tantalum, tin, tungsten or gold originating in the Covered Countries. In addition, we expect our suppliers (and their suppliers) to complete their own due diligence regarding the source and chain of custody of any tantalum, tin, tungsten and gold used in components or products that they supply to us.

Accordingly, our expectations of our suppliers regarding Conflict Minerals are as follows:

- Support and comply with the Conflict Minerals Rule and adopt policies and procedures that are reasonably designed to prevent products or parts that are not DRC conflict-free from entering BMC’s supply chain.
- Participate in our due diligence efforts by (1) annually reporting to BMC regarding the Conflict Minerals being sourced for parts used in BMC’s products and (2) working with their own suppliers to identify the smelter or refiner of Conflict Minerals in parts used in BMC’s products.