

Policy Title: Supplier Code of Conduct	
Department Responsible: Procurement	
Policy Number:	Original Effective Date:
Version Number: 1	Last Review Date: 11/16/2023
	Next Periodic Review Date: 11/16/2024

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1.0 SCOPE

This Supplier Code of Conduct applies to all suppliers of Vulcan Materials Company and its subsidiaries and affiliates.

2.0 POLICY

2.1 Business Conduct & Ethics

Every supplier of Vulcan is expected to comply with all applicable laws and regulations for the countries in which the supplier does business.

Bribery/Anti-Corruption

Suppliers shall comply with the U.S. Foreign Corrupt Practices Act and all applicable laws and regulations with regard to bribery and corruption. Vulcan expects its suppliers to refrain from paying bribes or offering any other form of inducement intended to gain advancement, e.g., agift, kickback, grant, donation, facilitation payment, etc., in the course of a business interaction with a customer or public official/employee.

Antitrust

Vulcan expects its suppliers to refrain from unfairly restraining trade and thus avoid the following:

- agreements with competitors not to compete;
- “no poach” agreements;
- price-fixing, bid-rigging, or any form of collusion in the marketplace;
- discussions with competitors about competitively sensitive topics; and
- any other form of conduct which violates any antitrust laws.

Additional Expectations

In addition, suppliers are expected to:

- **Observe generally accepted accounting principles** in all transactions with Vulcan;
- **Disclose any known conflicts of interest** such as relationships with Vulcan employees or their family members or any situations that could reasonably give the appearance of a conflict of interest; and
- **Maintain the confidentiality of any nonpublic information** obtained as a result of the supplier’s relationship with Vulcan. Depending on the relationship and information

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provided, suppliers may be asked to enter into a non-disclosure agreement with Vulcan prior to exchanging sensitive business information and should negotiate in good faith regarding such an agreement.

2.2 Regulatory and Compliance

Trade and Import Restrictions

Suppliers are expected to abide by and comply with all applicable customs, trade, export and import laws and regulations when transferring goods, services, software or technology within their country or across national boundaries; comply with sanctions and embargoes; and ensure all duties, levies and tax obligations are fully met.

Rights of Indigenous and Tribal Peoples

Vulcan expects its suppliers to follow all applicable local and national laws that protect Indigenous Peoples.

Conflict Minerals

Vulcan expects its suppliers to follow the U.S. Securities and Exchange Commission guidelines regarding any use of conflict minerals, e.g., the use of raw materials that directly or indirectly contribute to armed conflict or human rights abuses with respect to any of their products.

Privacy

Vulcan expects its suppliers to respect others' privacy and comply with all applicable data privacy laws. Suppliers should responsibly collect, process, and transfer personal information in accordance with Vulcan's Privacy Policy unless it conflicts with stricter requirements of applicable law, in which case such law will apply. Vulcan expects its suppliers to enter into reasonable data processing agreements to ensure all Personal Information, as defined by applicable data privacy laws, is processed in accord with such law.

2.3 Human Rights and Workplace Management

Suppliers are expected to protect the rights of their employees and ensure they are treated with respect and dignity. They are also expected to be good global corporate citizens and consistently conduct business in accordance with the following standards:

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Child Labor and Modern Slavery

Vulcan will not knowingly engage a supplier that directly or indirectly through a third party engages in any form of forced labor, including child labor or modern slavery.

Suppliers are expected to not employ child labor. Child labor is defined as work performed by someone under the minimum age for employment in the country where the work is performed; or the age for completing compulsory education in that country, whichever is highest. Vulcan supports participation in legitimate workplace internship, apprenticeship and training programs as long as they comply with all applicable laws and do not interfere with children's schooling, or their ability to benefit by it.

Suppliers are expected to prohibit all forms of modern slavery: any work that is performed under threat of penalty, including forced overtime, human trafficking, debt bondage, forced prison labor, slavery or servitude. Suppliers shall not withhold migrant workers' identification documents. Suppliers' employees should be free to terminate their employment at any time, subject to any applicable provisions in a lawful employment contract.

Equal Opportunity and Non-Discrimination

Vulcan expects its suppliers to be committed to equal opportunity in the employment context and to make every reasonable effort to ensure their employees enjoy a discrimination-free workplace.

Employment Compensation and Standards

Vulcan expects its suppliers to invest in their people, providing their employees the essential training, guidance and supportive environment they need to develop, advance and excel.

In setting compensation, suppliers should maintain programs designed to attract and retain well-qualified and highly skilled employees. Suppliers should pay their workers not less than the minimum wage required by applicable law and ensure their workers benefit from any social security plans required by national legal standards. In the event national law does not set a legal minimum wage, Vulcan expects its suppliers to ensure fair conditions by paying their workers at least a general level of wages in the country which takes into consideration the cost of living, social security benefits and the living standards relevant in the country. Vulcan also expects its suppliers to strive to administer employee discipline fairly.

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Freedom of Association and Collective Bargaining

Vulcan expects its suppliers to respect employees' right to join or not join unions, and the freedom to bargain collectively in compliance with all applicable laws, without interference, coercion, or retaliation. In instances in which employees are represented by a union, Vulcan expects its suppliers to bargain in good faith with union representatives and remain committed to maintaining an open dialogue with them.

Workplace Security

Vulcan expects its suppliers to have a policy in place to address workplace violence to ensure any acts of such kind will not be tolerated. Actual and threatened acts of workplace violence should be taken seriously by suppliers. Vulcan expects its suppliers to take steps to investigate, address, and resolve any such problems.

Non-Harassment

Vulcan expects its suppliers to provide work environments free from unlawful intimidation, hostility, harassment or other offenses that might interfere with work performance. Suppliers must treat all employees with respect and dignity. Vulcan expects its suppliers to have a mechanism for employees to safely report any such behavior free from threat of retaliation.

Employee Safety and Health

Vulcan is committed to responsible stewardship with respect to safety and health. In accordance with this commitment, it is Company policy to promote the adoption of, and adherence to, sound safety and health practices by suppliers. Suppliers are expected to comply with applicable federal and state safety and health laws and regulations.

2.4 Environmental Compliance and Stewardship

Vulcan is committed to carrying out our business activities in an environmentally responsible and sustainable manner and to minimize the negative environmental impacts of our activities. In addition to complying, at a minimum, with all applicable environmental laws and regulations, suppliers are expected to share Vulcan's commitment to environmental and natural resources stewardship. Suppliers should identify and manage the relevant environmental impacts of their business activities, which may include climate change and greenhouse gas emissions; air, water and land management; and waste management.

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2.5 Monitoring, Compliance, and Acknowledgment

Monitoring & Compliance

Suppliers are expected to comply with this Code. Vulcan maintains the right to take actions to ensure this code has been implemented and is being followed by suppliers. If it is the case that a supplier is found to be out of compliance with this code, and if corrective actions are not delivered within a time frame jointly agreed upon by Vulcan and the supplier, the supplier may be subject to loss or termination of business with Vulcan.

The Business Conduct Hotline is an independent line of communication provided for stakeholders, including suppliers, to address infractions or the inability to adhere to this Code of Conduct due to the actions of a Vulcan Materials employee, or to report other violations of Vulcan's Business Conduct Policy.

To make a report via phone in the United States, call 1-800-615-4331.

To make a report via phone related to operations in another country, or to file a report online, please visit <https://secure.ethicspoint.com/domain/media/en/gui/16082/index.html>.

Acknowledgment

By acknowledging this document, the Supplier agrees to abide by the Supplier Code of Conduct.

APPROVAL AND OWNERSHIP

Owner	Title	Date
Tarik London	Procurement Manager	11/16/23
Approved By	Title	Date
D. Franklin	Senior Vice President, General Counsel & Chief Compliance Officer	11/16/23

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