

Unlawful Harassment/Retaliation Policy (ER-16)

This Policy is organized under the following headings:

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SCOPE:

This Policy applies to all employees of Vulcan Materials Company and its subsidiaries. Contractors, suppliers, business clients, vendors, and customers of Vulcan are also prohibited from subjecting Vulcan employees to unlawful harassment and retaliation as defined herein.

GENERAL STATEMENT:

The Company is committed to maintaining a work environment that is free from unlawful harassment and discrimination by any co-worker, supervisor, or other person.

The Company encourages the reporting of complaints and allegations of any violations of this policy and prohibits unlawful retaliation of any kind for making such reports or complaints.

In furtherance of these commitments and in conjunction with the established corporate policies regarding Sexual Harassment (ER-15) and Fair Employment (ER-11), the following policy has been established.

POLICY:

The work environment of the Company is to be free from unlawful intimidation, hostility, harassment or other offenses that might interfere with work performance. The Company specifically prohibits any form of unlawful harassment by or from employees, contractors, suppliers, and/or customers.

Unlawful harassment is offensive conduct relating to an individual's personal identity which has the purpose or effect of:

- Creating an intimidating, hostile, or offensive work environment;
- Interfering with an individual's work performance; or
- Adversely affecting an individual's employment; or
- Otherwise disparaging an individual personally.

Examples of personal identity include, but are not limited to, age, color, race, religion, gender, sexual orientation, national origin, disability, and/or veteran status.

Any employee who violates this policy will be subject to corrective action including, if circumstances warrant, termination of employment. Any supervisor who is made aware of unlawful harassment or has a reasonable suspicion that such harassment is occurring and fails to take action pursuant to this policy will be subject to corrective action including, if circumstances warrant, termination of employment. Any contractor, supplier, customer or vendor who violates this policy will be subject to a change in relationship with the Company, including termination of that relationship.

Individuals who believe they have been unlawfully harassed should report their complaint to a human resource official of their choice or by accessing the Company Helpline at 1-800-615-4331 or via the

internet at www.vulcanmaterials.com. Each complaint will be promptly investigated with adequate and appropriate action taken as circumstances warrant in accordance with this policy. No employee will be subjected to retaliatory action for reporting the unlawful harassment to the Company in good faith, even if it is ultimately determined that the conduct reported was not a violation of the policy. All complaints will be handled in a confidential manner with disclosure occurring only where circumstances warrant or direct, such as in response to legal directives.

The Company's Senior Vice President, Human Resources, in coordination with Division Human Resources Directors, is responsible for ensuring compliance with this policy.