

Sexual Harassment Policy (ER-15)

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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 sexual harassment as defined herein.

GENERAL STATEMENT:

The Company is committed to maintaining a work environment that is free from unlawful sexual harassment by any co-worker, supervisor, or other person. Unwelcome sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature is a violation of this policy if:

- Submission to such unwelcome conduct is made either explicitly or implicitly a term or condition of employment.
- Submission to or rejection of such unwelcome conduct is used as the basis for employment decisions affecting an employee or applicant.
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, or offensive work environment.

In the furtherance of this commitment, the following policy has been established.

POLICY:

Vulcan disapproves of and will not tolerate unlawful sexual harassment in its workplace. Therefore, it is unacceptable for any employee or other person to engage in unlawful conduct that includes unwelcome sexual advances, requests for sexual favors, or implicit or explicit verbal or physical acts based on sex. Any employee engaging in such conduct will be subject to disciplinary action, including, if appropriate, termination of employment. Any supervisor who knows of such sexual harassment or has a reasonable suspicion that such harassment is occurring or has occurred and fails to take action pursuant to this policy will be subject to discipline including, if warranted, termination of employment. Any employee of a contractor, supplier, business client, vendor or customer who violates this policy will subject themselves and their employer to a change in relationship with the Company, including termination of that relationship.

PROCEDURE:

- Employees or applicants who believe that they have been unlawfully sexually harassed should report their complaint to a human resource official of their choice or by accessing the Company's Helpline at 1-800-615-4331 or via the internet at www.vulcanmaterials.com
- The identity of the complaining person, as well as the record of the complaint, will be maintained in a confidential manner; disclosure will only occur when circumstances warrant such as during the investigation of a complaint or in response to legal directives.
- Unlawful retaliatory action against an employee because the employee has filed a complaint or participated in an investigation pursuant to this policy will not be tolerated.

- Each complaint will be investigated in a prompt and thorough manner with adequate and appropriate action taken as the circumstances warrant, consistent with this policy.
- The Company's Senior Vice President, Human Resources, in coordination with Division Human Resources Directors, is responsible for implementing and monitoring this policy.