

Vulcan Materials Company

Unlawful Harassment/Retaliation Policy

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1.0 SCOPE

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

2.0 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.

3.0 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, business clients, vendors, agents, customers, and/or any other individuals with whom the Company does business.

In general, harassment includes unwelcome verbal, written, physical, visual or other conduct that creates an intimidating, offensive, or hostile working environment, or that interferes with an employee's work performance. 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;
- Adversely affecting an individual's employment; or
- Otherwise disparaging an individual personally.

Such conduct may include, but is not limited to, the following:

- Verbal conduct such as epithets, teasing, derogatory jokes or comments, or slurs;
- Visual conduct such as derogatory posters, photography, calendars, cartoons, drawings, gestures, or other displays of visual material intended to belittle or intimidate based on personal identity;
- Physical conduct such as assault, unwanted touching, blocking normal movement, or interfering with work; and/or
- Retaliation for having reported or threatened to report harassment.

Examples of personal identity include, but are not limited to, characteristics protected by law from harassment including age, color, race, religion, gender, sexual orientation, gender identity, national origin, physical or mental disability, genetic information, and veteran and protected 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, vendor, agent, or any other individual doing business with the Company who violates this policy will be subject to a change in relationship with the Company, including termination of that relationship.

4.0 PROCEDURE

An employee who believes s/he has been (a) unlawfully harassed or (b) observes conduct s/he believes violates this policy should immediately report the complaint to a human resource professional of their choice. In addition, the employee should contact a member of the legal department, the Compliance Officer, or report their concern by accessing the Company Helpline at 1-800-615-4331 or via the internet at www.vulcanmaterials.com if the employee:

- (a) Is unable for any reason to contact a human resources representative;
- (b) Does not feel comfortable talking to a human resources representative;
- (c) Has not received a response after reporting any incident of what they perceive to be harassment.

Timely reporting of any harassment incident is vital to the Company's ability to investigate complaints and take appropriate action.

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 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 Corporate and Division Human Resources Vice Presidents and Directors are responsible for ensuring compliance with this policy.