

HEIDELBERG MATERIALS SUPPLIER CODE OF CONDUCT FOR CANADA & THE UNITED STATES

The business activities of Heidelberg Materials US, Inc., Heidelberg Materials Canada Limited, and their subsidiaries and affiliates operating in the United States and Canada (collectively, “HM NAM”) are subject to federal, state or provincial, and local laws and regulations dealing with environmental protection, product safety, and social welfare matters. Many of these laws and regulations also apply to the suppliers who sell products and provide services to HM NAM.

This Supplier Code of Conduct seeks compliance by HM NAM’s suppliers with international social accountability standard SA8000,

environmental standard ISO 14001, and the Fundamental Principles and Rights at Work Branch of the International Labour Organization.

This Supplier Code of Conduct applies to all suppliers dealing with HM NAM and is normally adopted as part of the contractual relationship between the supplier and the relevant HM NAM company. HM NAM values close and productive cooperation with its suppliers and will work with them to meet the standards set forth in this Supplier Code of Conduct.

This Supplier Code of Conduct imposes these requirements on suppliers:

1. Working Conditions/Labor Relations

- 1.1 Suppliers must not use child labor in any stage of manufacturing or production.
- 1.2 Compensation and benefits must comply with applicable laws on minimum wages, overtime hours, and legally mandated benefits.
- 1.3 Any form of forced or compulsory labor must not be used, and employees shall be free to leave employment after reasonable notice.
- 1.4 Suppliers are expected to adhere to applicable law regarding the right of employees to freedom of association and their right to collective bargaining.
- 1.5 Workers should have safe and healthy working conditions that meet or exceed applicable law for occupational safety and health.

2. Environmental Standards

- 2.1 Operations of suppliers will be carried out with care for the environment and will comply with all applicable laws and regulations.
- 2.2 All products and services will be delivered in compliance with applicable law and the environmental, quality, and safety terms specified in the contract, and will be safe for their intended use.

3. Business Ethics

- 3.1 Business will be conducted with integrity. There will be no payments, services, gifts, entertainment or other advantages offered or given to any HM NAM employee or third party

which are intended to influence the way in which the HM NAM employee or third party goes about his or her duties. Similarly, HM NAM will not offer or give such payments, services, gifts, entertainment or other advantages to any supplier which are intended to influence the way in which the supplier goes about its duties.

- 3.2 There will be respect for human rights. Harassment and discrimination against employees in any form is not acceptable. This includes, but is not limited to, discrimination on the basis of gender, ethnic origin, skin color, religion, sexual orientation, disability, age, or any other protected category under applicable law.

4. Additional Requirements

- 4.1 HM NAM’s suppliers will require adherence to the principles of this Supplier Code of Conduct from their direct suppliers and exercise diligence in verifying that these principles are being adhered to in their supply chains.
- 4.2 Safeguarding these standards is a long-term learning and development process. HM NAM will work with its suppliers towards compliance and will regularly review and revise these principles.
- 4.3 If a supplier is not able to meet the standards set forth in this Supplier Code of Conduct, HM NAM reserves the right to terminate the contract with the supplier.
- 4.4 In case of any conflict between the terms of this Supplier Code of Conduct and the contract between the supplier and the relevant HM NAM company, the terms of the contract will prevail.

If a supplier believes that a HM NAM employee is not complying with this Supplier Code of Conduct, other HM NAM policies, or applicable law, the supplier is encouraged to contact one of the undersigned, the HM NAM law department, or the HM NAM ethics and compliance hotline reporting system (see <https://www.speakupfeedback.eu/web/heidelbergcement/us>).

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