



(As amended December 7, 2023)

HUMAN RIGHTS POLICY

1. Purpose

- a. This Human Rights Policy applies throughout Eagle Materials Inc. and its subsidiaries and affiliates (“Eagle”, “Company”, “we”, “our”, or “us”) and is intended to express our active and continuous determination to meet our responsibility to respect and align with internationally recognized human rights standards in accordance with the ten principles of the UN Global Compact, the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.
- b. Human rights are the fundamental rights, freedoms, and standards of treatment to which all people, including historically vulnerable women’s and minority populations, are entitled. Respecting human rights and conducting business to the highest ethical standards are core values at the Company and embedded in everything that we do.

2. Forced Labor, Slavery, Child Labor and Human Trafficking

- a. We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, child labor, modern forms of slavery and any form of human trafficking.
- b. The Company promotes respect for ethical conduct and human rights with its third parties such as subcontractors, business partners, suppliers, vendors, and other third parties. We believe that working with partners that share in our human rights commitment is critical to the success of our business operations and brand integrity. See our Code of Vendor Conduct found on our website.

3. Health and Safety

- a. The safety and health of all of our employees is of paramount importance to the Company. See our Occupational Health and Safety Policy found on our website.

4. Community and Stakeholder Engagement

- a. We recognize that we are part of the communities in which we operate. We engage with communities and stakeholders on human rights issues that are related to our business and that are important to such communities and stakeholders, including, but not limited to, land use, environmental impacts, and civil impacts such as transportation and health. Our aim is to ensure through an open dialogue that we are listening to, learning from, and considering the views of the communities we operate in as we conduct our business.

5. Diversity and Inclusion

- a. We value and advance diversity and inclusion in our workplaces. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to establish and maintain workplaces that are free from discrimination or harassment on the basis of race, color, age, religion, marital status, sex, sex stereotyping, gender, gender identity or expression, ancestry, national origin, citizenship, military or veteran status, pregnancy (including child birth and breastfeeding, and medical conditions related to them), mental or physical disability, sexual orientation, medical condition, genetic information, or any other characteristic protected by federal, state or local law. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is an individual's qualifications, performance, skills and experience.
- b. We do not tolerate harassing conduct that affects tangible job benefits, that unreasonably interferes with an individual's work performance, safety, or that creates an intimidating, hostile, or offensive working environment.

6. Work Hours, Wages and Benefits, and Freedom of Association

- a. We compensate our employees competitively relative to the industries in which the Company operates as well as the local labor market, and in accordance with the terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and employee benefits laws, and to pay our employees at least a living wage.
- b. We do not restrict workers' rights to exercise freedom of association or to collectively bargain at any of our operations, and a sizeable minority of our employees are covered by collective bargaining agreements.

7. Land Rights and Water Resources

- a. We respect the human need for sustainable water supplies, safe drinking water, and the importance of water for both ecosystems and communities. We view access to clean water as a basic human right. We address this by adhering to proper water regulatory management in accordance with applicable laws and regulations.

8. Rights of Indigenous and Tribal Peoples

- a. Eagle is respectful of the collective rights and unique histories and cultures of indigenous and tribal peoples, also known as First Peoples, First Nations, Aboriginal Peoples, Scheduled Tribes or Native Communities. Given that we conduct business in numerous geographic locations, we are mindful of the fundamental human rights of our stakeholders.
- b. In the case of the rights of Indigenous Peoples where there may be interactions with our business operations, we will work to avoid infringing upon the rights and protections for Indigenous Peoples as set forth in relevant local and national laws. In projects involving significant potential impacts on land and natural resources traditionally used by the indigenous community, or significant impacts on critical cultural heritage, we will engage in

meaningful consultation with directly affected Indigenous Peoples with the goal of achieving mutually agreeable outcomes for the business operation and stakeholders.

9. Code of Conduct, Employee Training and Internal Accountability

- a. We strive to create workplaces in which open and honest communications among all employees are valued and respected. The Company is committed to complying with applicable labor and employment laws wherever we operate.
- b. Our Code of Conduct (“The Eagle Way”) outlines Eagle’s expectations for business conduct and practices. It includes provisions on conducting business with high ethical and legal standards. All employees are expected to ensure compliance with The Eagle Way and report possible violations, which would include anti-corruption and human rights issues. Employees may make use of an anonymous hotline. The availability of the hotline is also highlighted in employee postings at all of our locations.
- c. The Audit Committee of our Board of Directors oversees the hotline. One of the areas of responsibility of the Audit Committee specified in its Charter is assisting the Board in fulfilling its responsibility to oversee the Company's compliance with legal and regulatory requirements. These would include those related to anti-corruption and human rights.
- d. All employees are periodically required to acknowledge in writing their compliance with The Eagle Way. Eagle has internal training programs which, among other things, focus on the values set forth in The Eagle Way (including those related to anti-corruption and human rights). Management participates in these training programs. Failure of any employee to comply with The Eagle Way, including its reporting requirements, can lead to disciplinary action up to and including termination.