



(adopted December 7, 2023)

## SUPPLY CHAIN TRANSPARENCY STATEMENT

### 1. Purpose

- a. This Supply Chain Transparency Statement is intended to express the commitment of Eagle Materials Inc. and its subsidiaries and affiliates (“Eagle”, “Company”, “we”, “our”, or “us”) to maintaining a lawful and ethical supply chain. Eagle does not knowingly conduct business with suppliers who violate human rights or anti-human trafficking laws. This includes, but is not limited to, forced or compulsory labor, unlawful child labor, any modern form of slavery, and any form of human trafficking. We are committed to compliance with all governmental laws, rules, and regulations applicable to our operations, including, but not limited to, fair employment practices and compliance with equal employment opportunity, safe and healthful work environments, equitable treatment of employees, and all other laws in the United States and other countries where we source products through our supply chain.

### 2. Expectations of Suppliers

- a. Eagle purchases a variety of items from various reputable and established suppliers. We are not in a position to monitor the operations of every one of our many suppliers, whether by way of self-conducted audits or through third-party auditing. Eagle does, however, convey to and expect its suppliers to adhere to applicable law, including employment laws. Eagle’s expectations in this regard are embodied in our Code of Vendor Conduct found on our website.

### 3. Supplier Assessments, Qualification, and Reviews

- a. Prior to engagement of a supplier, Eagle follows a qualification process which may include interviewing the prospective supplier and conducting a risk-based assessment, which may also include supplier questionnaires and in some cases audits of supplier facilities. Our expectation for compliance with ethical and legal standards is communicated to all potential suppliers through our terms and conditions and Code of Vendor Conduct.
- b. We continuously strive to improve our supply chain. Once a supplier is engaged, Eagle and the supplier may develop performance targets and objectives, and we monitor business performance through periodic evaluation and review of these performance targets and objectives.

### 4. Supplier Audits

- a. While Eagle does not currently audit every supplier, we do regularly audit certain suppliers to confirm compliance with supplier performance and quality standards. Audits are performed by us or third parties contracted by us.

- b. Such audits are not solely for the purpose of investigating a supplier's reliance on human trafficking or slavery, but in the event such activities are detected during the audit, Eagle would take appropriate action, including reporting and cancelling outstanding orders if appropriate.

**5. Supplier Agreements**

- a. Eagle has supply agreements and/or purchase order terms and conditions with all of its suppliers. These contracts include agreement to comply with all laws and regulations applicable to that supplier, including employment laws. As a responsible manufacturer, should we have any reason to believe that a raw material supplier is engaging in slavery or other unlawful human trafficking, we would take immediate action, including reporting and cancelling outstanding orders if appropriate.

**6. Code of Conduct, Employee Training and Internal Accountability**

- a. 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.
- b. All employees are expected to ensure compliance with The Eagle Way and report possible violations, which would include unethical or illegal behavior of a supplier. 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. 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. Employees whose job responsibilities include supply chain management, including international sourcing, receive such training. In addition, such employees receive targeted training regarding identifying and reporting suspected human trafficking or slavery in Eagle's supply chain.
- d. Failure of any employee to comply with The Eagle Way, including its reporting requirements, can lead to disciplinary action up to and including termination.