



(As amended December 10, 2024)

CODE OF VENDOR CONDUCT

1. Purpose

- a. This Code of Vendor Conduct applies throughout Eagle Materials Inc. and its subsidiaries and affiliates (“Eagle”, “Company”, “we”, “our”, or “us”) and is intended to provide an overview of the expectations and standards to which we hold our vendors, suppliers, contractors, consultants and service providers (“Vendors”).
- b. Eagle is committed to ethical practices and compliance with all applicable laws and regulations wherever we do business.

2. Code of Conduct

- a. We encourage our Vendors to adhere to our Code of Conduct (“The Eagle Way”) when doing business with us. The Eagle Way can be found on our website.

3. Vendor Safety

- a. Vendors are expected to comply with all applicable health and safety laws and regulations, as well as internal requirements, when on our premises.

4. Human Rights

- a. Eagle will not knowingly conduct business with Vendors 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.
- b. We expect all Vendors to conduct themselves in compliance with the above statement. We also refer Vendors to our Human Rights Policy found on our website.
- c. A further description of our efforts with regard to maintaining an ethical supply chain can be found in our Supply Chain Transparency Statement found on our website.

5. Anti-Bribery

- a. Vendors are expected to comply with all applicable anti-bribery laws and regulations.

6. Environmental, Waste and Biodiversity Stewardship

- a. Eagle expects all its Vendors to comply with all environmental laws and regulations. We refer Vendors to our Environmental Policy found on our website. The Company is committed to the communities near our operations and a large part of that commitment concerns environmental stewardship. We responsibly treat and dispose of all waste (including business waste and chemical waste) and expect our Vendors to do the same. Any environmental compliance issues concerning our Vendors will be discussed with them and corrective actions will be implemented. Eagle expects our Vendors to have the requisite environmental training for all employees. The Company reserves the right to conduct Vendor audits to ensure compliance with our environmental expectations and applicable laws and regulations.
- b. Eagle owns significant land tracts with resources used in our business units. We consider the surrounding ecosystem and communities when planning and performing our work. Eagle complies with all applicable law and regulations and acts as a good steward of the lands we own. Before undertaking any work on our lands, we ensure we are following all state and federal guidelines and regulations for our operations near endangered and threatened species and their habitats. We expect our Vendors to do the same.

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

- a. We expect our Vendors to compensate their employees competitively relative to the industries in which they operate as well as the local labor market, and in accordance with the terms of applicable collective bargaining agreements. We expect our Vendors to work to ensure full compliance with applicable wage, work hours, overtime and employee benefits laws.
- b. We expect our Vendors to not restrict workers' rights to exercise freedom of association or to collectively bargain at any of their operations.