

Asphalt Materials, Inc.'s Supplier Code of Conduct

Effective: 3/1/2024

1. INTRODUCTION

Asphalt Materials, Inc., and its affiliate, subsidiary, and parent companies ("AMI") are committed to conducting business in compliance with ethical standards and all applicable laws, rules, and regulations.

AMI conducts business with third-party partners, providers, and their authorized and approved subcontractors ("Suppliers") to deliver products and services to AMI and its customers. AMI strives to actively pursue and engage with Suppliers who are committed to safety, integrity, and compliance. Additionally, AMI expects and holds its Suppliers accountable for conducting business honestly and responsibly at all times, whether on AMI property, on AMI customer property, or throughout normal operations. This AMI Supplier Code of Conduct ("Code") ensures Suppliers are aware of AMI's expectations.

This Code is not intended to be exhaustive. The terms and conditions herein are and in addition to, and are not intended to conflict with or modify, the terms and conditions of any contract, subcontract, purchase order, or other applicable agreement ("Agreement") between AMI and Suppliers. In the event of any conflict, applicable law or regulation shall take precedence, followed by the terms and conditions of any applicable agreement, followed by this Code.

2. SUPPLIER CODE OF CONDUCT

Suppliers play a critical role in the success of AMI. AMI values these existing and potential Supplier relationships and selects and develops Suppliers based on the principles of integrity, respect, and trust. AMI Suppliers add value by offering goods and/or services that enhance safety, quality, and cost-effectiveness. Fair and honest business transactions between AMI and Suppliers are imperative, while deception and misleading tactics will not be tolerated. Therefore, AMI expects all Suppliers to conduct business in a manner that exhibits commitment to health, safety, and the environment; the value of employees; and sound governance.

2.1. Commitment to Health, Safety, and the Environment

AMI aims to protect the health and safety of human life, while simultaneously reducing the environmental impact of its activities. Achieving these AMI objectives requires conducting operations reliably and efficiently, which includes selecting Suppliers that are similarly committed to these values.

Commitment guidelines for the achievement of this objective include:

- Protect health and safety by providing appropriate training, protocols, controls, procedures, and equipment.
- Implement and abide by health and safety rules and regulations to ensure employee safety and health.

- Respect the environment through compliance with applicable environmental laws.
- Implement waste, emissions, and treatment systems to ensure waste, air emissions, and wastewater discharge are minimized and managed safely and appropriately.

2.2. Commitment to Employees

AMI and Suppliers are expected to cultivate a respectful work environment at their respective worksites. Commitment guidelines for the achievement of this objective include:

- Respect the Freedom of Association and Collective Bargaining Rights and abide by applicable laws related to labor unions.
- Practice no discrimination in hiring, employment, or compensation based on race, sex, religion, color, sexual orientation, disability, age, national origin, gender identity, gender expression, genetic information, veteran status, political preference, or membership or non-membership in any lawful organization.
- Create a workplace free of harassment or any other form of abuse in accordance with applicable laws regarding harassment and abuse, including sexual harassment, bullying, or verbal abuse.
- Prevent involuntary or underage labor and refuse to engage in human trafficking, slavery, child labor, prison labor, indentured labor, or bonded labor; and
- Establish appropriate work hours, wages, and benefits in accordance with applicable laws and regulations.

2.3. Commitment to Legal and Ethical Business Conduct

AMI is committed to the adherence to ethical standards, conduct guidelines, and all accompanying laws. AMI proactively seeks Suppliers committed to complying with these same ethical standards, conduct guidelines, and laws. At a minimum, AMI expects its Suppliers to conduct business ethically and abide by all applicable laws, rules, and regulations.

2.3.1. Professional Standard of Care

Suppliers must maintain the highest professional standard of care when conducting business. Suppliers, in good faith, must never propose, produce, or continue to produce goods and/or provide services that do not add value or act as a detriment to the best interest of AMI. Should a Supplier become aware that an aspect of work no longer adds value or is no longer in the best interest of AMI, the Supplier must notify AMI immediately.

2.3.2. Financial and Business Records

Suppliers must maintain accurate financial and business records in relation to their business dealings with AMI and update these records as required and in accordance with all laws, rules, and regulations.

2.3.3. Bribery, Corruption, Extortion, or Embezzlement

Supplier bribery, corruption, extortion, or embezzlement of any kind will not be condoned or tolerated by AMI. AMI requires that Suppliers not engage or be affiliated with any act that involves bribery, corruption, extortion, or embezzlement and to comply with the U.S. Foreign Corrupt Practices Act and all other local, national, or applicable laws.

2.3.4. Fair Competition and Antitrust

Suppliers must always engage in fair competition with AMI, abiding by all applicable fair competition and antitrust laws. Suppliers, therefore, must not participate in arrangements that unlawfully restrain competition, price fixing, bid rigging, division of markets, or cartel activity, nor exchange current, recent, or projected pricing information or other Confidential Information with competitors. Similarly, Suppliers must not share with AMI the Confidential Information of its competitors except as authorized by the owner of the information.

2.3.5. Sanctioned Parties

Suppliers must not source products or services from sanctioned parties when conducting business dealings with AMI. Sanctioned parties are individuals or entities that are individually, or by reason of their location, subject to economic sanctions, prohibitions, or other restrictions.

2.3.6. Data Privacy, Information Security, and Intellectual Property

Suppliers must protect sensitive data and confidential information (“Confidential Information”) received or made aware through interactions with AMI and AMI customers, including, but not limited to financial and accounting information, transactions or potential transactions, business agreements, intellectual property, trade secrets, customer information, employee information, financial and accounting information, technology, business strategies, operating processes, processes, and training. If permitted by AMI, transfer of this type of information by Supplier must be undertaken only when necessary precautions are in place and due care is exercised.

2.3.7. Conflict of Interest

Suppliers must make business decisions free from conflict of interest. All business decisions should be impartial and not benefit the self-interest of one individual at the detriment/expense of professional or public interest. Suppliers must avoid interactions with AMI employees, AMI customers, and other Suppliers that create or appear to create conflicts of interest. Upon awareness, all conflicts of interest

must be fully disclosed in writing. Refer to “Reporting” section below for further guidance and direction.

2.3.8. Business Gifts and Entertainment

AMI and its employees cannot accept business gifts and entertainment from Suppliers where expenditures are excessive, unlawful, or not business-appropriate. Under internal travel and entertainment policies, business gifts and entertainment must follow these strict guidelines:

- Business gifts and entertainment must have a legitimate business purpose.
- Business gifts and entertainment must be reasonable and consistent with legal and ethical guidelines/limitations.
- Only business gifts and entertainment of nominal value are acceptable.
- Business gifts and entertainment are never to be solicited by a AMI employee, AMI customer, or other Supplier.

2.3.9. Modern Slavery

Suppliers must maintain the highest professional standard of care when conducting business. This includes being attentive to the protection of basic human rights of its personnel and third-party personnel used in the provision of supplies or services to AMI. For example, Suppliers must be vigilant in ensuring it does not engage in acts that support, intentionally or unintentionally, modern slavery.

2.4. Commitment to Compliance

AMI expects Suppliers to demonstrate a commitment to comply with this Code. Additionally, AMI expects Suppliers to adhere to all laws, rules, regulations, and site rules through the implementation of robust systems and protocols necessary to ensure that compliance is maintained and enforced. Suppliers should also apply this Code and other similar principles in business dealings with respective subcontractors and Suppliers used in connection with AMI. Where applicable, AMI expects Suppliers to comply with the Contractor Code of Business Ethics and Conduct (FAR 52.203-13). Suppliers that fail to comply with the Supplier Code of Conduct will be expected to take immediate corrective action or risk loss of current and future AMI business.

3. REPORTING

Suppliers shall embrace a safe and compliant culture and environment by adhering to the ethical standards set forth herein the Supplier Code of Conduct. Suppliers should always raise concerns regarding any activities, practices, or incidents involving violations or suspicion of violations of these policies and/or applicable laws, rules, or regulations.

In the event that an incident occurs which violates these policies and/or laws, the incident must

be reported to AMI and addressed immediately. AMI expects any Supplier who witnesses or receives information regarding an AMI employee, customer, or Supplier engaging in illegal, unethical, or other improper conduct to report these violations to the appropriate AMI point of contact. Suppliers are expected to notify AMI of legal actions, administrative investigations, or prosecutions which may affect their performance of AMI business or could potentially adversely affect a Supplier's and/or AMI's reputation.

Reporting Points of Contact

AMI provides several points of contact for its Suppliers to report concerns, incidents, and/or violations to the content discussed herein. The appropriate point of contact chosen below is subjective and based solely on the reporting stakeholder situation and preference.

AMI Stakeholder

This AMI point of contact has direct, regular interaction with the Supplier and is responsible for implementing the particular product or service of the Supplier. This point of contact is first to receive and investigate any concerns of a potential incident or violation.

AMI Human Resources

This point of contact becomes involved when the integrity of an AMI stakeholder is evident or any concerns of a potential major incident or violation. AMI Human Resources can be contacted by email at AMI_HR@asphalt-materials.com. All incident and violation reports will remain confidential, but not all will remain anonymous.

AMI Ethics Hotline

The AMI Ethics Hotline is the point of contact that makes reporting any concerns, incidents, and violations easier in uncomfortable or difficult situations. The AMI Ethics Helpline is operated by an independent third party, so reports remain confidential and may be made anonymously where permitted by law. Reporting a violation or suspicion of a violation can be made via web at www.THG.IntegraReport.com (Location "Asphalt Materials") or by phone at (888) THG-1930.

4. OTHER CONSIDERATIONS

This Supplier Code of Conduct is intended to clarify each Supplier's existing obligation for proper conduct. The standards and any supporting policies and procedures may change at AMI's discretion. Each Supplier is responsible for knowing and complying with the Code, current laws, regulations, standards, policies, and procedures that apply to the Supplier's products and services. The most current version of this document can be found at <https://asphalt-materials.com/supplier-code-of-conduct/>

AMI reserves the right to pursue corrective action to remedy any violation of this Code. In the case of a violation of law or regulation, AMI may be required to report such violations to the

proper authorities. AMI reserves the right to terminate its relationship with any Supplier under the terms of the existing applicable Agreement.