

June 2, 2025, Website Version 1.0

The Vulcan Standard: Forging Ethical Excellence

Code of Business Conduct and Ethics



Vulcan Metals Corporation
12200 NW Ambassador Drive
Kansas City, Mo 64113

In addition to English, this booklet to be published in additional languages soon.

Note: The most current version of this document is available online via the Vulcan Metals Corporation internal network (once available) and externally at www.vulcanmetals.com

A Message from Chief Executive Officer

Dear Team,

At Vulcan Metals Corporation, our success is built on more than just the exceptional quality of our products; it is built on the integrity of our people and the strength of our values. As we continue to produce solutions for the heavy industrial, rail, energy, and defense sectors, our commitment to safety, compliance, and ethical practices remains at the core of who we are.

This Compliance Manual serves as a guide to ensure that we uphold the highest standards in everything we do. It reflects our unwavering dedication to safety first, to maintaining integrity and compliance, and to fostering a workplace where ethical behavior is not just encouraged but expected. Every member of our team plays a critical role in safeguarding our reputation and ensuring that Vulcan Metals Corporation is a trusted partner to our customers, communities, and stakeholders.

We take pride in being technologically forward and producing premiere-quality castings that set the benchmark for excellence in the industries we serve. But beyond the quality of our work, it is the way we conduct ourselves—guided by this manual and the principles it contains—that define us as an organization.

As a company, we are committed to innovation, sustainability, and responsibility. Our values drive us to operate with transparency, prioritize environmental stewardship, and create solutions that not only meet today's needs but also help build a stronger and more sustainable future.

This manual is more than a policy document—it reflects our collective commitment to doing what is right. I encourage each of you to read it thoroughly, understand your responsibilities, and apply these principles in your daily work. By doing so, you contribute to a culture of trust, accountability, and excellence that will continue to set Vulcan Metals Corporation apart.

Thank you for your dedication to upholding the standards that make Vulcan Metals Corporation a leader in our field and a company we can all be proud of. Together, we are forging a future defined by integrity, safety, and success.

Nathan Heisler



President and Chief Executive Officer

Vulcan Metals Corp.

Our Vision and Values

Vulcan Metals Corporation sets the standard for integrity in everything we do. We demand this of ourselves just as others, including our stockholders and customers, expect this of us.

OUR VISION:

Our vision is to be the **globally recognized leader** in engineered metal solutions, setting the industry standard for innovation, quality, and customer partnership. We aspire to **continuously advance casting technology** and expand our global reach, providing mission-critical solutions that shape the future of essential industries.

OUR VALUES:

At Vulcan Metals Corporation, our values guide every decision we make and every product we manufacture:

- Safety First – We prioritize the well-being of our employees, partners, and communities by maintaining the highest safety standards in everything we do.
- Integrity and Compliance – We adhere to strict ethical and regulatory standards, ensuring trust and accountability in every aspect of our operations.
- Innovation and Technology – We embrace cutting-edge technologies to deliver forward-thinking solutions that meet the evolving needs of the rail, energy, and defense industries.
- Unparalleled Quality – We are relentless in our pursuit of excellence, producing high-integrity castings that set the benchmark for quality and reliability.
- Sustainability and Responsibility – We are committed to sustainable practices that protect our environment and contribute to the long-term success of the industries we serve.
- Partnership and Collaboration – We believe in building strong, transparent relationships with our customers, employees, and stakeholders to achieve shared success.
- Teamwork – Vulcan Metals Corporation values employees who are self-motivated, committed to success and willing to work together in pursuit outstanding results.

These values define who we are and inspire us to produce a better future for all.

Upholding the Code

WHAT WE DO

- Our Code applies to all Vulcan Metals employees, members of the Board of Directors, consultants, contract laborers and other agents when they represent or act for the Corporation.

- We require you to perform your duties in compliance with our Code and policies as well as conduct yourself in accordance with applicable laws and regulations.
- Leaders have a special obligation to be aware of actions that could influence employees to act in a way that is contrary to our ethical standards set forth in our Code.

WHY WE DO IT

- We follow both the letter and the spirit of the laws and regulations that govern our business and the countries in which we operate.

Responding to Investigations and Legal Action:

- You are required to cooperate in internal investigations. You must never destroy or alter any documents or electronic records, lie to or mislead an investigator or obstruct the collection of information relating to an investigation or any legal action brought on behalf of, or against, the Corporation. To the greatest extent possible, we will cooperate with government agencies responsible for investigating suspected violations of the law. If requested by Vulcan Metals, you are also required to cooperate with investigations conducted by any government.
- You must notify the Ethics Office, Legal Department or your manager if you learn that a government agency or any third party is conducting an investigation or asking for information pertaining to a suspected violation of law.

We are Committed to Protecting Human Rights

WHAT WE DO

We are committed to good citizenship, which includes the protection and advancement of internationally recognized human rights.

Fair Treatment

- We treat others with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all and help create an inclusive and ethical culture.
- We prohibit harassment, bullying and discrimination, use of child, compulsory or forced labor, trafficking in persons and any acts associated with modern day slavery for any purpose.

Resource Access

- We promote environmental responsibility by reducing our use of natural resources and maximizing the efficiency of our products.

- We innovate technologies that can protect and provide access to natural resources.
- We support economic access through fair and inclusive hiring and remuneration practices and supplier diversity outreach.

Labor Practices

- We comply with all applicable wage and hour laws and regulations and provide legally-mandated benefits.
- We respect the right of employees to exercise their right of free association and to choose or not choose collective bargaining representation.

WHY WE DO IT

The protection and advancement of human rights:

- Maintains our commitment to integrity and our core values
- Promotes employee satisfaction and productivity
- Enhances competitiveness of our business

POLICIES

We Report Violations

WHAT WE DO

- You are responsible for reporting a violation or suspected violation of the Code, policy or a contract provision.
- You must not take illegal or unethical action, even if it appears to benefit the Corporation or is directed by a higher authority in the organization.
- You can, and should, consider how you might respond if faced with different types of ethical dilemmas or conflicts.

WHY WE DO IT

- We are committed to the highest standards of ethical conduct in our dealings with our constituencies.
- Violations of the Code may result in disciplinary action up to and including termination. Failure to report may itself violate this Code.

You can report suspected violations to:

- Management
- Human Resources
- Legal Department
- Board of Directors
- Internal Audit
- Safety
- Ethics Office

Email: corporate.ethics@VulcanEthics.com

POLICIES

We Do Not Tolerate Retaliation

WHAT WE DO

- We do not tolerate retaliation.
- We take appropriate corrective action in response to violations of this Code, even if these actions are not always visible to you.
- If someone tries to stop you from reporting an issue, that person can be subject to disciplinary action up to and including termination.
- There is never a penalty for contacting the Ethics Office or any source in good faith. “Good faith” does not mean you have to be right, but it does mean you believe the information provided is truthful.

WHY WE DO IT

- Retaliation destroys trust and damages our ethical culture.
- When you speak up, it gives us the opportunity to improve our overall culture and performance.

What is Retaliation?

Retaliation is unfair or inappropriate treatment against an employee for reporting misconduct, filing a complaint, assisting another in making a complaint, participating in an internal investigation or making an ethics-related inquiry.

Other Rights:

U.S. law also entitles each Vulcan Metals employee to certain rights and protections against reprisals if the employee discloses, to certain governmental officials or to the Legal Department or Ethics Office, information that the employee reasonably believes is evidence of gross waste, mismanagement, abuse of authority, or violations of law related to U.S. government contracts, grants, or funds; or evidence of a substantial and specific danger to public health and safety.

POLICIES

We Accurately Charge Labor and Other Costs

WHAT WE DO

- Understand and follow the labor recording policies and procedures at your work location.
- Properly account for all costs including labor, travel, material and other costs. These costs include, but are not limited to, normal contract work, work related to independent research and development and bid and proposal activities.
- Never misrepresent facts or falsify records.

WHY WE DO IT

It is a violation of policy, and in some cases the law, to knowingly:

- Mischarge or falsify timekeeping records
- Incorrectly charge an account or cost objective
- Approve mischarging
- Shift costs to improper accounts

All business transactions must be promptly and accurately entered in our books and business records. This means that transactions between the Corporation and outside individuals and organizations are accounted for and executed in accordance with generally accepted accounting practices and principles in the United States, and in the countries where we do business.

POLICIES

We Use Vulcan and Government Assets Responsibly

WHAT WE DO

- Be responsible for properly using and protecting our Corporation's and our customers' property. This includes electronic communication systems, information resources, materials, facilities and equipment.
- Prevent waste and abuse of these assets. This means you must maintain the assets with care, guard against waste and abuse and never borrow or remove them from corporate or customer property without management's permission. Seek guidance and permission before using any customer asset for personal use.
- You are only permitted occasional personal use of company assets; such use is subject to the requirements and restrictions outlined in policy.
- Protect and store information on approved assets only.
- Do not use a corporate credit card for personal use.

WHY WE DO IT

- Vulcan Metals' resources and assets should be used for the benefit of our business.
- We are responsible for protecting customer resources and assets that are entrusted to the Corporation.

- We are responsible for protecting government and taxpayer resources and assets that are entrusted to Vulcan.

POLICIES

We Protect Sensitive Information

Sensitive Information includes Personal Information, Export Controlled Information, Vulcan Metals Proprietary Information, and Third Party Proprietary Information.

WHAT WE DO

You must:

- Handle, store and protect Sensitive Information in accordance with applicable requirements.
- Obtain proper authorization before disclosing or receiving such information, internally or through a third party (like a supplier, customer or competitor).
- Only access personal information or personal data for legitimate business purposes and have prior authorization.
- Respect the privacy and dignity of our employees and safeguard the confidentiality of employee records and information.
- Prior to disclosing classified information, ensure that recipients have the proper security clearance and “need to know.”
- When using social media, take extra care to protect information about the Corporation, your colleagues, customers and yourself.
- Refer external inquiries to Nathan Heisler
- Obtain proper approval before publishing or making outside presentations about

Vulcan Metals or its customers or partners. Employees should Wayne Braun

- **REPORT UNAUTHORIZED ACCESS OF SENSITIVE INFORMATION.**
- Be extra vigilant to avoid cybersecurity risks.
- Follow information protection requirements even after your employment or engagement with the Corporation ends.

WHY WE DO IT

- We are entrusted with Sensitive Information from the Corporation, our customers, suppliers and others.
- Mishandling information can damage our reputation, customers, partners and country. It can also result in penalties and fines against the Corporation and individual employees.

- When you do business internationally, there are country-specific laws to consider, including import/export issues, privacy considerations and unique information handling and safeguarding requirements.

POLICIES

We Only Provide and Accept Appropriate Business Courtesies

WHAT WE DO

- Avoid the perception that favorable treatment is being sought, received or given in exchange for business courtesies.
- Ensure that the offered business courtesy is permitted by law and policy.
- Verify that the rules of the recipient's organization are not violated by the offered business courtesy.
- Do not offer, give, solicit or receive any form of bribe or kickback, as these are criminal acts. A kickback is any money, fee, commission, credit, gift, gratuity, thing of value, loan, entertainment, service or compensation of any kind that is provided, directly or indirectly, to any prime contractor, prime contractor employee, subcontractor or subcontractor employee for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract with the U.S., or a subcontract in connection with a prime contract with the U.S.
- Recognize that complex rules and monetary limits apply when dealing with Public Officials, including members of the military.
- Consult policy and obtain guidance if you are uncertain if an action is inappropriate or within the allowable limits.

WHY WE DO IT

- When people exchange gifts or business courtesies, it can create (whether intentionally or not) the perception that favors were granted in order to influence business judgment. Some gift limit rules are calculated within a calendar year, and others depend on the fair market value of the courtesy being offered or received.
- We compete on the merits of our products and services and do not give business courtesies to gain an unfair competitive advantage. There are specific guidelines that apply in each country where we do business.
- We source products and services fairly and avoid accepting business courtesies that may cause even the perception of an inappropriate business relationship. There are more restrictive rules regarding acceptance of business courtesies for employees who work in Supply Chain Management or are involved in the process of directing business or funds to our business relations.

What is a Business Courtesy?

Any gift, gratuity, favor, benefit, loan, commission, discount, forbearance, or other tangible or intangible item having monetary value for which fair market value is not paid by the recipient. The recipient may be an individual or an entity. Such courtesies include, but are not limited to the following: cash and cash equivalents, discounts, door prizes and raffles, entertainment and recreation, free or reduced

cost admittance to a business-related event (conference, briefing, seminar, training, advisory board, committee meeting, etc.), gift cards/certificates, honoraria, hospitality, lodging, meals and drinks, models, promotional items, services, tickets (passes, fees, etc.), training, transportation, or use of a donor's time, materials, equipment, or facilities.

Who is a Public Official?

A person who, regardless of position, paid or unpaid, is any of the following:

- An officer or employee of any government, department, agency, bureau, authority, or government- owned instrumentality, such as a state-owned or state-controlled entity;
- Acting in an official capacity for or on behalf of any government, department, agency, bureau, authority, or instrumentality.
- An official, employee, or person acting on behalf of a government-sponsored or public international organization such as the United Nations, World Bank, or the European Community;
- Holding a legislative, administrative, executive, or judicial position, whether appointed or elected;
- A political candidate, or an officer or employee of a political party;
- A member of a Royal Family; or
- A family member of or otherwise closely associated with any of the foregoing

POLICIES

We Avoid Individual Conflicts of Interest

WHAT WE DO

- You must be fair and impartial in all business dealings.
- Our policies prohibit both an actual conflict of interest and activities that create the appearance of a conflict of interest. Avoid situations in which your personal interests might conflict, or appear to conflict, with Vulcan Metals' interests.
- Never use your contacts or position in the Corporation to advance outside or personal interests.
- Do not use our Corporation's property, information or opportunities for personal gain.

- You must provide written disclosure of actual or potential conflicts of interest as soon as you become aware of them.
- You have an annual obligation to certify your compliance with our conflict-of-interest policy.

WHY WE DO IT

- We are committed to the highest standards of ethical business conduct. We expect this of our employees, agents and Board of Directors. Agents include consultants, contract laborers and anyone else representing or acting for the Corporation.
- We have a responsibility to our stakeholders to act in the best interests of the Corporation.
- The internal disclosure process reinforces our intention to conduct business with integrity.

What is a Personal Conflict of Interest?

A personal conflict of interest exists when you have divided loyalties - when you have a direct or indirect personal interest in a transaction or matter such that it might reasonably appear to affect the judgment you exercise on behalf of Vulcan Metals, influence your actions or lead you to neglect Vulcan Metals' business interests.

Our Conflict of Interest policy covers many situations, including these examples:

- Owning, or having a substantial interest in, a company that is a customer, competitor or a supplier.
- Family members - Doing business with a firm owned or controlled by a Vulcan Metals employee or their family.
- Family relationships with people employed by a supplier or competitor.
- Gifts - Acceptance of gifts, payments or services from those seeking to do business with Vulcan Metals.
- Outside business interests - Owning your own business or working for another business while employed by Vulcan Metals, using the same or similar professional skills or training used in the course of your employment.
- Multiple roles - Acting as an independent consultant to a Vulcan Metals customer or supplier, while employed by Vulcan Metals.
- Using assets for personal gain - Using our assets, intellectual property or proprietary information for personal gain.
- Subordinate employees - Having a close, personal relationship with a subordinate employee.
- Charitable endeavors - Using work time selling products to benefit charitable organizations or soliciting donations for such organizations.

- Government employees - Discussing employment with government employees, giving them gifts in violation of applicable laws or regulations or assigning off-limits roles to Vulcan Metals employees who are former government employees.

POLICIES

Avoid Conflicts of Interest due to Government Employment

WHAT WE DO

- We comply with all laws and regulations covering employing or acquiring the services of government employees.
- We avoid conflicts of interest in connection with employing or acquiring the services of current or former government employees. This includes current or former military personnel and other government employees.

WHY WE DO IT

- Our continued success and ability to compete in the marketplace depend on ensuring that we do not hire or work with current or former government employees in a manner that creates a real or perceived conflict of interest.

These rules:

- Apply to contact or negotiations with current government employees to discuss their potential employment by the Corporation or their use as consultants or subcontractors.
- May restrict the roles and responsibilities that former government employees may perform on our behalf after joining the Corporation.
- Can be complex. Always consult Vulcan Metals policy and seek the advice of

Human Resources or the Legal Department.

POLICIES

We Avoid Organizational Conflict of Interests

WHAT WE DO

- We identify, and avoid or mitigate, Organizational Conflicts of Interest (OCI) by screening new business opportunities appropriately.
- We abide by OCI restrictions.

WHY WE DO IT

Early identification and timely communication of potential conflicts of this nature:

- Builds customer trust.
- Reinforces our intention to conduct business with integrity.
- Allows Vulcan Metals to continue to participate in new business opportunities.
- Prevents disqualification and loss of business.

What is an OCI?

An OCI could occur if Vulcan Metals is unable or potentially unable to render impartial assistance, service or advice to a customer. The rules are intended to prevent both unfair competitive advantage and conflicting roles that might bias a company's judgment.

POLICIES

We Maintain Accurate Business Records

WHAT WE DO

- When you prepare or submit business or financial records, they must be accurate.
- You must not include proprietary or confidential information in any public disclosures without obtaining the proper prior approval. Public disclosures include reports or documents filed with the Securities and Exchange Commission, other regulatory authorities and other public communications made by the Corporation.

WHY WE DO IT

- We have an obligation to the public and our stockholders to make accurate public disclosures.
- We are committed to operating in an environment of open communication while not compromising proprietary or confidential information.

If you prepare business or financial records or public communications on behalf of the Corporation, you must ensure that all information they contain is comprehensive, fair, timely, accurate and understandable. Public communications include external presentations.

If you have concerns about any aspect of our business or financial records or auditing matters, or you learn that others have such concerns, you should talk to your manager, the Finance organization, Internal Audit, the Legal Department or the Ethics Office.

POLICIES

We Participate in Training

WHAT WE DO

- Our training is designed to help employees learn to execute our values through examples based on real situations in our work environment.
- You are required to complete your training by the specified due dates.
- Ethics Awareness Training is required annually of all employees, consultants and the Board of Directors.
- Business Conduct Compliance Training educates employees about specific compliance requirements. The target audience for each course is often role specific.
- Audits are conducted for effective execution.

WHY WE DO IT

- Training prepares us to recognize and react to situations requiring ethical decision making.
- Ethics Awareness Training allows us to talk about how ethics is part of the work we do.
- The courses improve our understanding of topics in this Code and teach us how to apply the training in practice.
- Training addresses the consequences of compliance violations for both Vulcan Metals and individual employees.
- Our courses help ensure that ethics is an integrated part of our business.

POLICIES

We are Committed to Security

WHAT WE DO

- We protect our people, operations and assets around the globe.
- We take action to mitigate threats to employee safety in our workplace.
- We properly safeguard all classified material and other information entrusted to us.
- We comply with and seek to exceed customer and national security policy requirements.

WHY WE DO IT

- Our commitment supports the security of our employees, customers and business partners.
- Security compliance benefits our Corporation, customers, national security.

- Adhering to security requirements supports contract performance.
- Our customers entrust us to deliver products and services without security compromises.

POLICIES

We Have Zero Tolerance for Discrimination and Harassment

WHAT WE DO

- We do not tolerate harassment or discrimination of any kind, especially involving race, ethnicity, religion, color, sex, pregnancy, national origin, age, military veteran's status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information or mental or physical disability.

WHY WE DO IT

Vulcan Metals's goal is to maintain a professional work environment that is free from:

- Threats
- Violence
- Bullying
- Abusive or intimidating conduct
- Other similar behavior

Zero Tolerance

Our zero tolerance policy applies to all our employees, wherever they work or may be.

POLICIES

We Maintain a Safe and Healthy Work Environment

WHAT WE DO

You must:

- Comply with applicable environmental, safety and health laws, regulations, policies and procedures.
- Observe all posted warnings and regulations.
- Report immediately to the appropriate management any accident or injury sustained on the job, or any environmental, safety or health concern you may have.

WHY WE DO IT

- We are committed globally to providing a safe and healthy work environment and protecting human health and the environment.
- We observe environmental stewardship practices throughout the world because it is the responsible thing to do and is good for business.
- Sustainable business practices benefit people and the planet and provide economic benefit.

POLICIES

We Maintain a Drug-Free Workplace

WHAT WE DO

- We prohibit possession, use, sale, manufacture, transfer, trafficking in or being under the influence of illegal drugs, and abuse of legal drugs, in the workplace or when performing business on behalf of the Corporation.
- We prohibit being under the influence of alcohol in the workplace or when performing business on behalf of the Corporation.
- As a federal contractor, Vulcan Metals must maintain a drug-free workplace. State and local initiatives legalizing marijuana for medical or recreational purposes do not change this requirement.
- Our premises are tobacco-free and smoke-free. This includes E-cigarettes.

WHY WE DO IT

- Health and wellness initiatives directly relate to a productive work environment. We follow the Drug-Free Workplace Act of 1988 and equivalent acts in the other countries where we operate.
- Using an illegal substance can negatively impact your ability to perform safely, be productive and obtain or maintain a security clearance or continued employment.

POLICIES

We Value Fair Competition

WHAT WE DO

- Be fair in our dealings with customers, suppliers, competitors and employees.
- Make sure that all statements, communications and representations to prospective customers and suppliers are accurate and truthful.

- Perform all contracts in compliance with specifications, requirements and contract terms and conditions.
- Refuse offers of unauthorized contractor bid, proposal or source selection information.
- Never use, obtain, accept or receive any information to which Vulcan Metals is not clearly and legitimately entitled.

If you receive or release unauthorized information, or if you are uncertain as to the Corporation's legal right to use the information, do not copy, distribute or use it. Seek guidance from the Legal Department or Ethics Office.

WHY WE DO IT

- We value the integrity of the procurement process in bidding, negotiating and performing contracts.

POLICIES

We Conduct International Business with Integrity

WHAT WE DO

- We have zero tolerance for corruption.
- We adhere to all applicable export and import regulations.
- We do not engage in or support restrictive international trade practices or boycotts not sanctioned by the U.S. government.
- We comply with both the U.S. law and the laws of the countries where we do business (unless in conflict with U.S. law). When you encounter a conflict with U.S. law, you are required to address this conflict speak with the Legal Office.

WHY WE DO IT

- Our high standards of ethical business conduct are a key component of our business integrity strategy that enables us to build customer relationships and win programs around the world.
- Bribes, export and import violations, and illegal boycotts damage the trust and transparency needed to transact legitimate and long-term business.
- Corruption creates unfair competition, increases cost and jeopardizes the quality and capability of our products and services.
- Non-compliance can result in potential personal and corporate debarment, incarceration and monetary penalties, as well as irreparable reputational harm to our business.

Anti-Corruption

You must strictly comply with the anti-corruption laws that govern our operations in the countries where we do business. These laws include the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act and similar laws in other countries.

What do these laws do?

- Prohibit direct or indirect bribery of U.S. and international government officials, political parties, party officials, or candidates for public office or employees of commercial organizations to obtain or retain business or an improper business advantage.
- Prohibit knowingly falsifying books and records or knowingly circumventing or failing to implement adequate internal accounting controls, which could facilitate or conceal bribery.

Our policy prohibits offering or making improper payments of money or anything of value. The policy applies to anyone conducting business on behalf of Vulcan Metals. This includes Vulcan Metals directors, officers, employees, consultants, representatives, distributors, offset brokers, suppliers, wholly owned subsidiaries and other business partners.

Our policy specifically prohibits facilitating payments. Facilitating payments include payments made to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance.

Export/Import and Other Trade Restrictions

- We require strict compliance with all export and import laws and regulations that cover the transfer of certain technical data, equipment and technology between countries.
- You may not obligate Vulcan Metals to engage in trade in any country subject to trade restrictions imposed by the U.S. government.
- Before you negotiate or enter into an international transaction, consult with the International Trade Compliance Office, Legal Department or Ethics Office.

These restrictions can include sanctions or embargoes that prohibit Vulcan Metals from engaging in certain business activities in specified countries, and with specified individuals and entities. For example, U.S. law prohibits interaction with identified terrorist states and organizations.

International trade laws and regulations are complex. Be careful to avoid even inadvertent violations.

We Conduct International Business with Integrity

Antiboycott

- Do not engage in or support restrictive international trade practices or boycotts not sanctioned by the U.S. government.
- Do not enter into an agreement, provide any information or take any action that would cause Vulcan Metals to refuse to deal with potential or actual customers, suppliers or others in support of an illegal boycott.

All requests, whether written or oral, must be reported immediately to the Legal Department or Ethics Office.

POLICES

Contact The Legal Department or Ethics Office about conflicts with U.S. law or the specific laws and regulations that apply to your job.

We Properly Engage Third Parties

WHAT WE DO

- We do not engage with third parties to conduct business in a manner that is contrary to law or to our policies or that would circumvent our values and principles. Consultants, representatives and third parties must certify that they will comply with the Corporation's requirements for doing business on its behalf.
- We are accountable for the actions undertaken on our behalf by third parties. Actions we prohibit include:
 - Offering or paying or receiving bribes or kickbacks
 - Engaging in industrial espionage
 - Obtaining the sensitive, proprietary or classified data of a third party without authority
 - Improperly gaining inside information or influence

WHY WE DO IT

- The decisions and actions of third parties who conduct business on our behalf impact our Corporation's reputation and may result in criminal or civil liability for the Corporation.

POLICIES

Seek advice from Consultant Services prior to engaging an international or domestic consultant.

We Respect the Political Process

WHAT WE DO

We follow corporate policy and the law concerning the political process in all countries where we do business.

WHY WE DO IT

- We uphold the spirit and letter of all laws relating to our participation in the political process.
- Laws governing political contributions, gifts and lobbying are complex. Even unintended violations can result in loss of business opportunities, damage to our reputation and civil and criminal penalties.

Using any Vulcan Metals funds, assets or facilities for the benefit of political parties or candidates anywhere in the world without obtaining prior written approval The Vulcan Metals Board of Directors International for political activities is prohibited.

Lobbying

Lobbying can be direct or indirect, but either way, it is highly scrutinized. You must follow all applicable rules and regulations, particularly avoiding violations — even unintentional — of corporate policy and federal rules concerning gifts and lobbying.

- U.S. Congressional and Executive Branch — It is important that Vulcan Metals present a single, consistent business message to our U.S. based customer community. Vulcan Metals works with business areas to develop a united approach to the Corporation's U.S.-based marketing initiatives and policy, regulatory and legislative strategies. To this end, the CEO must authorize any interaction with U.S. Congressional members or Executive Branch officials in Washington, D.C. or their employees and staff.
- State and Local Governments — A Vice President of Operations or the CEO must authorize any interaction with state and local government officials on behalf of Vulcan Metals.
- Non-U.S. Governments — You must know and follow corporate policies and procedures before contacting any member or employee of a non-U.S. entity.

Take Action

Ask Yourself...

- Have I considered all the risks?
- Who gains from this and who could lose?
- Does this sound too good to be true?

- Why is this bothering me?
- How would this look to our customer or supplier?
- How would I feel if my family or friends knew what I was doing?
- Do I have valid data that may lead to a different decision?
- Is this fair and honest?
- Does my leadership know?
- What are the consequences of this solution?
- Do I need to ask more questions for a clearer picture?

WHAT WE DO

- We use the Voicing Our Values techniques to put our values into practice.
- We address values conflicts and potential violations of law or policy when they arise.
- We make ourselves aware of warning signs that our values are at risk.

WHY WE DO IT

- The integrity of the Corporation relies on each of us taking responsibility for living our values.
- Values conflicts are a normal occurrence in the work environment and must be resolved.
- Becoming familiar with warning signs helps us identify and correct potential problems before they grow.