

Company Name Vulcan Materials Company
Industry Extractive
UNGP Core Score (*) 3.5 out of 26

| Score | Out of | For indicators |
|---|-----------|--|
| Governance and Policy Commitments | | |
| 1 | 2 | A.1.1 Commitment to respect human rights |
| 0.5 | 2 | A.1.2 Commitment to respect the human rights of workers |
| 1 | 2 | A.1.4 Commitment to engage with stakeholders |
| 0 | 2 | A.1.5 Commitment to remedy |
| Embedding respect and Human Rights Due Diligence | | |
| Embedding respect | | |
| 0 | 2 | B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions |
| Human Rights Due Diligence (HRDD) | | |
| 0 | 2 | B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts |
| 0 | 2 | B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) |
| 0 | 2 | B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action |
| 0 | 2 | B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts |
| 0 | 2 | B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed |
| Remedies and Grievance Mechanisms | | |
| 1 | 2 | C.1 Grievance channels/mechanisms to receive complaints or concerns from workers |
| 0 | 2 | C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities |
| 0 | 2 | C.7 Remedying adverse impacts and incorporating lessons learned |
| 3.5 | 26 | |

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| A.1.1 | Commitment to respect human rights | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The company indicates that 'We use our management systems at Vulcan to guide our business conduct as well as our social, environmental and economic activities. These systems provide sustainable value by: Understanding, promoting and upholding fundamental human rights within our sphere of influence, respecting the traditional rights of indigenous peoples and valuing cultural heritage' [COMMITTED TO SUSTAINABILITY, 05/04/19: vulcanmaterials.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD |
| A.1.2 | Commitment to respect the human rights of workers | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core • Not met: UNGC principles 3-6 • Not met: Explicitly list All four ILO apply to EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core • Met: Respect H&S of workers: The company indicates that 'as an employer Vulcan provides: A firm commitment to employee health and safety'. Furthermore, the company indicates in the Mission and Values webpage that 'We will maintain a firm commitment to employee health and safety.' [COMMITTED TO OUR PEOPLE, 05/04/2019: vulcanmaterials.com & Mission and Values, 04/04/2019: vulcanmaterials.com] • Not met: H&S applies to EX BPs |
| A.1.4 | Commitment to engage with stakeholders | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The company indicates that it has management systems that provides sustainable value by 'Encouraging and supporting open, honest and regular engagement with the communities we serve, and considering their views in our decision making'. The company also indicates that part of their shared cultural values is 'Engage constructively with our neighbours and help them build stronger communities.' [COMMITTED TO SUSTAINABILITY, 05/04/19: vulcanmaterials.com & ANNUAL REPORT 2018, 02/04/2019: s1.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder engagement • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement |
| A.1.5 | Commitment to remedy | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The company indicates that 'we will maintain a steadfast commitment to minimize any adverse impacts our activities have on the environments in which we operate'. However, a commitment to minimize the impacts does not count as formal commitment to remedy adverse impact the company may cause or contribute to. Additional evidence was not found in more recent documents. [Mission and Values, 04/04/2019: vulcanmaterials.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts |

Embedding Respect and Human Rights Due Diligence

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| B.1.1 | Responsibility and resources for day-to-day human rights functions | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Senior responsibility for HR Score 2 <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs |
| B.2.1 | Identifying: Processes and triggers for identifying human rights risks and impacts | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: identifying risks in EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR) |
| B.2.2 | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met |
| B.2.3 | Integrating and Acting: Integrating assessment findings internally and taking appropriate action | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met |
| B.2.4 | Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met |
| B.2.5 | Communicating : Accounting for how human rights impacts are addressed | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications |

Remedies and Grievance Mechanisms

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| C.1 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company has an ethics point available online where there are different possibilities to make a report. [EthicsPoint, 05/04/2019: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved Not met: Channel is available in all appropriate languages: The Company only operates in the USA, Mexico and The Bahamas, however no evidence found of a Channel available in Spanish or any other language than English. [MAP, 05/04/2019 & EthicsPoint, 05/04/2019: secure.ethicspoint.com] Not met: Expect EX BPs to have equivalent grievance system Not met: Opens own system to EX BPs workers |
| C.2 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Grievance mechanism for community Score 2 <ul style="list-style-type: none"> Not met: Describes accessibility and local languages Not met: Expects EX BPs to have community grievance systems Not met: EX BPs communities use global system |
| C.7 | Remedying adverse impacts and incorporating lessons learned | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Describes how remedy has been provided Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> Not met: Changes introduced to stop repetition Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism |

Performance: Responses to Serious Allegations (Not included in the overall score)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|-------------------------|------------------|--|
| E(1).0 | Serious allegation No 1 | | No allegations meeting the CHRB severity threshold were found. |

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice.

The CHRB is part of the World Benchmarking Alliance ('WBA'). The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of WBA, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the

Benchmark. Neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with Dutch law and shall be subject to the exclusive jurisdiction of the Courts of Amsterdam.

As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

COPYRIGHT

Our publications and benchmarks are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution-Non Commercial-No Derivatives 4.0 International License. To view a copy of this license, visit creativecommons.org